



# Arizona Department of Education

## Health and Nutrition Services Division

### Seamless Summer Option Administrative Review Summary Report

Sponsor: Continental Elementary District

CTD: 10-03-39

Sites: Continental Elementary School

Contacts: Roxana Rico, Superintendent and Greg Schubert, Food Service Director

Review Date: March 25, 2021

Review Period: February 2021

Review Type:  SSO

No.	Review Findings	Technical Assistance Provided	Required Corrective Action
<b>SFA Operations</b>			
1	The availability and location of free meals at area-eligible sites was not advertised to the community. Specifically, the media release provided during the review period was for the National School Lunch Program which included meal pricing and not for the Summer Food Service Program - Seamless Summer Option (SSO) stating all meals are provided free of cost for 18 years and under.	Discussed where to find nondiscrimination statement on ADE's website at <a href="http://www.azed.gov/hns/civilrights">http://www.azed.gov/hns/civilrights</a> / and whether long or short statement would be most appropriate. Additionally, discussed the nondiscrimination statement is required on advertising material.	<i>Please provide a written description of the advertisements that will be used to notify the community of the availability and location of free meals and written assurance that this will occur each year.</i>
<b>Site Agreement</b>			
No Findings.			
<b>Site Eligibility</b>			
No Findings.			
<b>Menu Planning</b>			
2	Meal contribution crediting is not accurate for all recipes. Specifically, Cheese Crisp credits as 0.5 oz eq Meat/Meat Alternate, not 1 oz eq of Meat/Meat Alternate.	Discussed updating recipes to reflect current products being used.	<i>Please provide an updated recipe for Cheese Crisp.</i>

- 3 The following product could not be credited towards the meal pattern due to insufficient documentation: Tortilla. Without sufficient documentation, the reviewer was unable to determine if the quantity requirements were met. Specifically, conflicting Tortilla product documentation was provided, the most up to date documentation do not provide weighted grams to utilize Exhibit A to credit toward the meal pattern. This was determined to not be a repeat finding from cycle two and did not contribute towards fiscal action calculations.
- Discussed requirements regarding processed product documentation and provided examples. USDA Food Fact Sheets can be found on USDA's website at <http://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets/>. The CN Labels and Product Formulation Statements Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Recorded Webinars tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).
- Please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation. Additionally, the certificate of completion of CN Labels and Product Formulation Statements must be submitted.*
- 4 Although advertising literature was provided for Graham Cracker and Brownie and credited towards meal pattern, required documentation (CN label or PFS) was not provided to reviewer.
- Discussed when processed products are used in Child Nutrition Programs to meet the meal pattern requirement, the product's contributions must be determined. CN Labels and/or Product Formulation Statements provide valuable crediting information; and only these will be accepted as proper crediting documentation. Guidance on Product Formulation Statements and CN Labels can be found on ADE's website under the Processed Product Documentation section found at [www.azed.gov/hns/nslp/mealpattern](http://www.azed.gov/hns/nslp/mealpattern). The CN Labels and Product Formulation Statements Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/trainings/snarchivedwebinars/>.
- Please provide a CN label and/or Product Formulation Statement for the Graham Cracker and Brownie. If unable to provide a CN label or PFS, please provide written assurance that the product will no longer be offered/served to students. Additionally, please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation.*

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| <p>5 During the week of review, all grains served at breakfast were not whole grain rich. Specifically, the Tortilla was Enriched and not Whole Grain-Rich.</p>   | <p>Discussed whole grain-rich requirements. USDA's Whole Grain Resource for the National School Lunch and Breakfast Programs: A Guide to Meeting the Whole Grain-Rich Criteria can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning tab.</p>  | <p><i>Please provide one week of breakfast production records and supporting documentation (CN Label, PFS, ingredient lists, nutrition fact labels, etc.) that demonstrate all grains served at breakfast were whole grain-rich.</i></p>  |
| <p>6 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, during breakfast the daily 1 cup Fruit requirement was not met on 2/8/21, 2/11/21 and 2/12/21. This was determined to not be a repeat finding from cycle two and did not contribute toward fiscal action calculations.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in recipe serving sizes and production record portion servings). Meal pattern requirements for the National School Breakfast Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the How-To Guides tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that daily Fruit quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Breakfast Menu must be submitted.</i></p> |

- 7 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, during breakfast the weekly 5 cup Fruit requirement was not met, only providing 4 cups. This was determined to not be a repeat finding from cycle two and did not contribute toward fiscal action calculations.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in recipe serving sizes and production record portion servings). Meal pattern requirements for the National School Breakfast Program can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the How-To Guides tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).
- Please provide a written description of the changes that have been made to ensure that weekly Fruit quantities meet minimum amounts required by the meal pattern.*
- 8 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, during breakfast on 2/10/21 the daily Grain requirement was not met due to insufficient documentation to confirm oz eq of Grain. This was determined to not be a repeat finding from cycle two and did not contribute toward fiscal action calculations.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., maintain Grain crediting documentation). Meal pattern requirements for the National School Breakfast Program can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the How-To Guides tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).
- Please provide a written description of the changes that have been made to ensure that daily Grain quantities meet minimum amounts required by the meal pattern.*

9 Quantities during the review period did not meet minimum amounts required by the meal pattern. Specifically, during lunch on 2/11/21 only 1/4 cup of Fruit was provided and not the 1/2 cup daily minimum requirement. This was determined to not be a repeat finding from cycle two and did not contribute toward fiscal action calculations.

Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving sizes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the How-To Guides tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).

*Please provide a written description of the changes that have been made to ensure that daily Fruit quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Lunch Menu must be submitted.*

10 Quantities during the review period did not meet minimum amounts required by the meal pattern. Specifically, during lunch the weekly Fruit provided was 2 1/4 cups and not the 2 1/2 cups weekly minimum required. This was determined to not be a repeat finding from cycle two and did not contribute toward fiscal action calculations.

Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving sizes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the How-To Guides tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).

*Please provide a written description of the changes that have been made to ensure that weekly Fruit quantities meet minimum amounts required by the meal pattern.*

- 11 Quantities during the review period did not meet minimum amounts required by the meal pattern. Specifically, during lunch on 2/12/21 the 3/4 cup daily Vegetable minimum requirement was not met. This was determined to not be a repeat finding from cycle two and did not contribute toward fiscal action calculations.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving sizes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the How-To Guides tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).
- Please provide a written description of the changes that have been made to ensure that daily Vegetable quantities meet minimum amounts required by the meal pattern.*
- 12 Quantities during the review period did not meet minimum amounts required by the meal pattern. Specifically, during lunch the weekly Red/Orange subgroup vegetable provided was 1/2 cups and not the 3/4 cup weekly minimum required. This was determined to not be a repeat finding from cycle two and did not contribute toward fiscal action calculations.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving sizes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the How-To Guides tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).
- Please provide a written description of the changes that have been made to ensure that weekly Subgroup vegetable quantities meet minimum amounts required by the meal pattern.*

<p>13 OVS was not implemented properly. Specifically, during lunch on 2/11/21 the menu planned did not provide a separate vegetable serving and the main entrée of Chili Beans was counted toward a vegetable serving when site is not implementing a serve-only menu.</p>	<p>Provided technical assistance on proper implementation of OVS and discussed with kitchen and point of service staff. Reviewed menu and discussed options for a reimbursable meal under OVS. USDA's Offer Versus Serve Manual, Effective beginning School Year 2015-2016 can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals tab.</p>	<p><i>Please provide a written description demonstrating how OVS will be implemented properly. Additionally, please provide written assurance that moving forward, OVS will be implemented properly.</i></p>
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<p>14 <b>Observation:</b> During the review period documentation provided of Household USDA Foods Fact Sheet were outdated and followed the MyPlate meal pattern, providing inaccurate meal equivalent crediting toward the School Nutrition Programs.</p>	<p>Discussed Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. Additionally, discussed requirements regarding processed product documentation and provided examples. Recommended accessing the USDA Food Fact Sheets on USDA's website at <a href="http://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets/">http://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets/</a>. The CN Labels and Product Formulation Statements Recorded Webinar &amp; Webinar Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Recorded Webinars tab.</p>	<p><i>No required corrective action required.</i></p>
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**Counting & Claiming**

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No Findings.

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**Media Release**

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No Findings.

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**SFA Monitoring Responsibilities**

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No Findings.

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### Civil Rights

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- 15 The "And Justice for All" poster displayed were older versions.
- Discussed USDA guidance states that the "And Justice for All" poster must be the most current and updated version.
- The SFA took prompt action and removed all outdated "And Justice For All" posters displayed and ensured the current and updated versions were the only posters displayed during the review period. Please provide written assurance that the "And Justice For All" poster will be the most current and updated version.*
- 16 Procedures for receiving and processing complaints alleging discrimination within the school meal programs are not in place. Specifically, written procedures were not received in the review period for civil right complaints, only district complaint procedures are in place.
- Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., ADE, Food & Nutrition Services Southwest Regional Office, FNS Office of Civil Rights, or USDA Office of Civil Rights). The SFA's procedures must note whether an allegation is made verbally or in person. Additionally, the SFA's procedures must not indicate that they attempt to resolve the complaint themselves nor can the SFA's complaint process be a prerequisite for accepting a complaint. Additional guidance can be found on ADE's website at <https://www.azed.gov/hns/civilrights>. The Step by Step Instruction: How to File a Civil Rights Complaint can be found on ADE's website at <https://www.azed.gov/hns/nslp/training> under the How-To Guides tab.
- Please provide a written description of the process and procedures for processing complaints alleging discrimination within FNS School Meal Programs. Additionally, the certificate of completion of Step by Step Instruction: How to File a Civil Rights Complaint must be submitted.*

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### Food Safety

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- 17 Documentation provided did not support that the school received two food safety inspections from the local health department each school year, or that the school requested two food safety inspections each year from the local health department. Specifically, documentation for one Food Safety Inspection was provided that was conducted on 9/9/2019.
- Discussed that each site operating must obtain two food safety inspections from the local health department per school year or maintain documentation to show that two food safety inspections were requested from the local health department each school year.
- Please provide a written description of how you will ensure that two food safety inspections from the local health department will be obtained each school year.*



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**Water**

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No Findings.

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**Comments/Recommendations:**

Congratulations! Continental Elementary District has completed the SSO portion of the Administrative Review for the 2020–2021 school year. Thank you for your organization and sense of urgency during the review process. It is evident that you are working hard to ensure your students are fed healthy, delicious meals.

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**Training: Web-based training and How-To guides can be found on ADE's website at <https://www.azed.gov/hns/nslp/training>**

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**COVID-19: Guidance to Child Nutrition Operators can be found on ADE's website at <https://www.azed.gov/hns/covid19>**

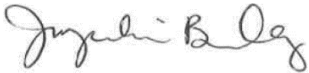
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**Fiscal Action Assessed?**

<input type="checkbox"/> No- SBP	<input type="checkbox"/> Yes- SBP	TBD
<input type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	TBD
<input checked="" type="checkbox"/> No - SSO SBP	<input type="checkbox"/> Yes- SSO SBP	\$0.00
<input checked="" type="checkbox"/> No - SSO NSLP	<input type="checkbox"/> Yes- SSO NSLP	\$0.00

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by May 26, 2021 to Joyce Benally at [Joyce.Benally@azed.gov](mailto:Joyce.Benally@azed.gov).



4/28/2021

Reviewer Signature

Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the [School Food Authority Appeal Procedure for the Administrative Review](#) found on the National School Lunch Program Administrative Review tab on the ADE website.