



Arizona Department of Education Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Devereux Arizona

CTD: 07-21-02

Site: Devereux Residential Education Center

Contacts: Yvette Jackson, Executive Director & Deverly Fedee, Food Service Manager

Review Date: December 15, 2020

Review Period: November 2020

Programs Reviewed: National School Lunch School Breakfast Afterschool Snack
 Fresh Fruit & Vegetable Special Milk At-Risk Afterschool Meals

| No. | Review Observations & Findings | Technical Assistance Provided | Required Corrective Action |
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| Performance Standard 1: Certification & Benefit Issuance- Critical Area | | | |

No findings.

Performance Standard 1: Meal Counting & Claiming- Critical Area

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| 1 | Breakfast and lunch during the review period did not support that reimbursable meal counts were accurate. This was deemed a systemic error and contributed towards fiscal action calculations. A full recalculation of breakfast and lunch served for the months of July 2020 through February 2021 was conducted. | Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. | <i>Changes to the procedures of meal counting and claiming have been made and a recalculation was conducted. Fiscal action calculations were disregarded. No further corrective action is required at this time.</i> |
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Performance Standard 2: Meal Components & Quantities- Critical Area

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| 2 | The meal service was not structured to comply with the meal pattern requirements of the multiple grade groups that were served during lunch; 9-12 meal pattern was served for K-8 grades. | Discussed allowable meal pattern grade groups per the grades served and planning the menu and keeping separate production records for K-8 grades during lunch. Also referred to Memo SP 48-2013 and the allowability of requesting a meal pattern waiver if there are safety concerns for serving different portion sizes. | <i>Please provide a written description of the changes that have been implemented to ensure that meal pattern requirements of the multiple grade groups served are met or provide a copy of the meal pattern waiver request.</i> |
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Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area

No findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

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| 3 | The documentation sheet for all children residing in the RCCI did not contain all of the required information. Specifically, the list did not contain the income, date of birth, date of admission, date of release, or the official's signature, title, and contact information. | Reviewed requirements for certification documentation for residents and provided the Master List sample template. For more information refer to the "Special Situations when Determining Eligibility" of USDA's Eligibility Manual for School Meals found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals tab. | <i>Please provide written assurance that the certification list for residents will contain all of the required information. Additionally, please provide a copy of the updated Master List which contains all of the required information.</i> |
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Meal Access & Reimbursement: Verification

No findings.

Meal Access & Reimbursement: Meal Counting & Claiming

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| 4 | Daily edit checks are not being conducted. | Discussed how to complete daily edit checks using ADE's Simplified Daily Edit Check worksheet. The Daily Edit Check Worksheet can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational tab. The Step by Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the How-To Guides tab. | <i>Please provide a completed daily edit check worksheet for the most recent monthly claim. Additionally, please provide written assurance that daily edit checks will be conducted.</i> |
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Meal Pattern & Nutritional Quality: Offer Versus Serve

No findings.

Meal Pattern & Nutritional Quality: Meal Components & Quantities

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| 5 | Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast or lunch. | Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab. | <i>Please provide the signs that will be displayed to students that demonstrate what constitutes a reimbursable meal at breakfast and lunch. Additionally, please provide written assurance that these signs will be displayed for all students to see.</i> |
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Resource Management

No findings.

General Program Compliance: Civil Rights

No findings.

General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

Observation: Due to school closures as a result of COVID-19, the triennial assessment of the implementation of the LWP was not conducted by June 30, 2020. The public must be notified of the results of the most recent assessment of the implementation of the LWP.

Per COVID-19: Child Nutrition Response #18, Nationwide Waiver of Local School Wellness Policy Triennial Assessments in the National School Lunch and School Breakfast Programs issued the requirement for SFAs to conduct a triennial assessment of their local wellness policy by June 30, 2020 was waived. SFAs are required to complete their LWP assessment by June 30, 2021 instead.

Discussed requirement to complete an assessment once every three years, at a minimum. The assessment must measure how the LEA is complying with their LWP, how the LEA's LWP compares to the model wellness policy, and progress made in attaining the goals of the wellness policy. Sample evaluation tools can be found on ADE's website: <https://www.azed.gov/hns/nslp/forms>. Also discussed the requirement of notifying the public of the results of the most recent assessment.

None required at this time.

General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

- 6 The School Nutrition Program Director did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.
- Discussed 12 hour requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at <https://www.azed.gov/hns/nslp/training>.
- Please provide an updated tracker that shows 12 training hours being completed and/or planned for the School Nutrition Program Director.*
- 7 Professional Standards training hours from previous years were included in the Director's current year's training hours.
- Discussed that the training hours are an annual requirement and not to include hours from the previous school years towards the current year's requirements.
- Please provide an updated director's tracker. Additionally, please provide written assurance that training hours will be tracked on an annual basis.*

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| 8 | Training trackers for the director and full-time staff were not completed accurately; the training codes were missing. | Discussed how to accurately complete the training trackers. Professional standards learning codes can be found on ADE's website at https://www.azed.gov/hns/nslp/training | <i>Please provide a copy of an updated training tracker with the training codes. Additionally, please provide written assurance that training trackers will be completed accurately.</i> |
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General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

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| 9 | The food safety plan was not site specific. The ADE Prototype Food Safety Plan was provided but was not customized for the site. | Discussed filling out the plan with information specific to SFA's operation, marking the date implemented on SOPs, and ensuring the plan is site specific. Additional food safety information can be found on ADE's website at: https://www.azed.gov/hns/nslp/forms . | <i>Please provide a written description of the changes that have been made to the food safety plan to ensure it is filled out and customized to SFA's meal service operation.</i> |
| 10 | The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d): Pineapple, banana, and mandarin oranges. Additionally, documentation justifying a Buy American exception was not on file. | Discussed the Buy American provision requirements and procedures to ensure compliance. Funds used from the non-profit food service account must be used to procure food products that comply with the Buy American Provision. Additional information on the requirements of this provision, including ADE's prototype Buy American exception document, can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational tab. | <i>Please provide copies of the completed Buy American exception forms and written assurance that this will be kept on file for 5 years.</i> |

General Program Compliance: Reporting & Recordkeeping

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| 11 | The numbers in the leftover and used servings section of the production records are not completed accurately during the week of review for breakfast. There are significantly less alternative breakfasts served so these should not be the same number as the main entree. | Discussed that the number of used and leftover servings should reflect the actual numbers for the alternative breakfast. Also, discussed that the number of planned entrées should reflect the number of servings expected to be served and should be adjusted based on student preference in order to avoid excessive leftovers. Parts of a Production Record Guidance can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab. The Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library. | <i>Please provide copies of completed breakfast production records for 7 consecutive days, as well as written assurance that all records will be maintained for 5 years.</i> |
| 12 | Total reimbursable meals on the production records do not accurately reflect the number of reimbursable meals tracked on the meal counting sheet during breakfast and lunch. | Discussed that the production records should support reimbursable meal counts. The Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library. | <i>Please provide copies of completed breakfast and lunch production records and meal count documentation for 7 consecutive days, as well as written assurance that all records will be maintained for 5 years.</i> |

General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach

No findings.

Other Federal Program Reviews: Afterschool Snack Program

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| 13 | Production records and other documentation for November 4, 9, & 28 do not support that all snacks counted for reimbursement contained two different components. This contributed towards fiscal action calculations. | Discussed the meal pattern requirements of the ASP and the requirement that a snack must contain two components if it is to be claimed for reimbursement. The ASP meal pattern table can be found on ADE's website at https://www.azed.gov/hns/afterschool under the Meal Pattern tab. | <i>Please provide Afterschool Snack Program (ASP) production records for 7 consecutive days that demonstrate that each snack provided to students contains at least two components. Additionally, please provide written assurance that the ASP meal pattern will be adhered to at all times. Fiscal action calculations were disregarded.</i> |
| 14 | Production records do not support that the Afterschool Snack Program (ASP) meal pattern was met on November 6 & 7 due to the juice quantity not being 3/4 cup. | Discussed the meal pattern requirements of the ASP. The ASP meal pattern table can be found on ADE's website at https://www.azed.gov/hns/afterschool under the Meal Pattern tab. | <i>Please provide a written description of plans to ensure that the fruit/juice/vegetable quantity meets the 3/4 cup requirement. Additionally, please provide written assurance that the ASP meal pattern will be adhered to at all times.</i> |
| 15 | The counting system employed does not result in accurate snack counts. The reviewer could not validate counts. This contributed towards fiscal action calculations. | Discussed ways to improve the counting system or alter it to ensure accurate counts are submitted in the claim for reimbursement. | <i>Please provide a written description of the system that will be implemented to ensure accurate snack counts are claimed for reimbursement. Fiscal action calculations were disregarded.</i> |

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2021 if applicable.

Other Federal Program Reviews: Fresh Fruit & Vegetable Program

Not applicable.

Other Federal Program Reviews: Special Milk Program

Not applicable.

Other Federal Program Reviews: At-Risk Afterschool Meals

Not applicable.

Comments/Recommendations:

Congratulations on completing the Administrative Review! Thank you for your hard work and flexibility during this review process. Keep up the great work!

To stay on track with NSLP requirements, check out the NSLP at a Glance Calendar & Monthly Checklist on our website at <https://www.azed.gov/hns/nslp/forms> under the Calendars and Checklists tab.

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

Fiscal Action Assessed?


No- SBP

Yes- SBP

No- NSLP

Yes- NSLP

Please submit corrective action response by **July 16, 2021** to Lindsey Cler at Lindsey.Cler@azed.gov.



6/17/21

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.

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