



Arizona Department of Education Health and Nutrition Services Division

Seamless Summer Option Administrative Review Summary Report

Sponsor: Naco Elementary District

CTD: 02-03-23

Sites: Naco Bus Route - Naco Elementary District

Contacts: Timothy Mayclin, Principal/Superintendent and Celia Valenzuela, Food Service Manager

Review Date: May 20, 2021

Review Period: April 2021

Review Type: SSO

No.	Review Findings	Technical Assistance Provided	Required Corrective Action
SFA Operations			
1	The Parent/Guardian Pickup Waiver Form was not submitted to ADE prior to the SFA implementing parent/guardian pickups. Specifically, the Parent/Guardian Pickup Waiver Form was submitted to ADE on 12/03/2020 for a 09/01/2020 start date.	Discussed ADE has created a Parent/Guardian Pickup Waiver Form for SFAs to provide details on how they will maintain accountability and Program integrity while distributing meals to parents or guardians without children present. SFAs only need to submit the form once for SY 20-21. The electronic form must be submitted before the SFA implements parent/guardian pickups. ADE will provide technical assistance and request clarification if an SFA's submission does not demonstrate that accountability and Program integrity will be maintained while implementing parent/guardian pickups. Referred to USDA Waiver Summary found on ADE's website at https://www.azed.gov/hns/covid19 .	Please provide written assurance that, moving forward, any new or updated Parent/Guardian Pickup Waivers will be submitted to ADE prior to implementation.

Site Agreement

No findings.

Site Eligibility

No findings.

Menu Planning

2	<p>Fluid milk was not available in at least two varieties for each meal service. This was attributed to the learning plan not allowing for milk choice at each meal service; however, a meal pattern waiver was not submitted.</p>	<p>Discussed variety requirement and feasible options for compliance (e.g., incorporating milk variety into mobile service or submitting a waiver). Allowable milk varieties are fat-free unflavored, fat-free flavored and 1% unflavored. Please note that repeated violations involving milk requirements may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> <p>Please submit a meal pattern waiver to ADE describing the justification for not offering two varieties of milk during breakfast and lunch for the timeframe of mobile meal service.</p>
3	<p>Quantities observed on the day of review did not meet minimum amounts required by the meal pattern. Specifically, daily meat/meat alternate requirements were not met at lunch. A 2-ounce ham patty crediting as only 0.75 oz eq of meat/meat alternate was served when 1 oz eq of meat/meat alternate is required daily at lunch for grades K-8. This was not 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., utilizing Product Formulation Statements when procuring products, increasing portions, 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 Online Training Library 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 Online Training Library tab. 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 Online Training Library 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 meat/meat alternate quantities at lunch meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of CN Labels and Product Formulation Statements must be provided.</i></p>

Quantities observed on the day of review did not meet minimum amounts required by the meal pattern. Specifically, daily vegetable requirements were not met at lunch. Only 1/2 cup of vegetable was served when 3/4 cup of vegetable is required daily at lunch for grades K-8. This was not 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 utensils, increasing portions, 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 Online Training Library 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 Online Training Library tab. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library 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 at lunch 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.

4

Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily fruit requirements were not met at breakfast. Only 1/2 cup of fruit was provided on 4/12/21, 4/13/21, and 4/14/21 and only 1/4 cup of fruit was provided on 4/15/21 when 1 cup of fruit is required daily at breakfast for grades K-8. This was not determined to 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 utensils, offering additional fruits, increasing portions, etc.). 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 Online Training Library 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 Online Training Library 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 at breakfast 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.

5

Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly fruit requirements were not met at breakfast. Only 2 3/4 cups of fruit were provided when 5 cups of fruit are required weekly at breakfast for grades K-8 . This was not determined to 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 utensils, offering additional fruits, increasing portions, etc.). 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 Online Training Library 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 Online Training Library 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 at breakfast meet minimum amounts required by the meal pattern.

6

Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily grain requirements were not met at breakfast on 4/15/21. Specifically, graham crackers crediting as 0.75 ounce equivalents were served with 1.0 ounce equivalents of cheese stick. Meat/meat alternates may not be counted toward the grain component at breakfast until after the minimum daily grains requirement (1.0 ounce equivalents) is offered. This was not determined to 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., increasing grain portions, procuring grains that credit as at least 1.0 oz eq per serving, etc.). 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 Online Training Library 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 Online Training Library 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 at breakfast meet minimum amounts required by the meal pattern.

7

Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily fruit requirements were not met at lunch on 4/16/21. Specifically, only 1/4 cup fruit was provided when 1/2 cup of fruit is required daily at lunch for grades K-8. This was not determined to 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 utensils, offering additional fruits, increasing portions, 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 Online Training Library 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 Online Training Library 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 at lunch 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, weekly fruit requirements were not met at lunch. Only 2 1/4 cups of fruit were provided when 2 1/2 cups of fruit are required weekly at lunch for grades K-8. This was not determined to 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 utensils, offering additional fruits, increasing portions, 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 Online Training Library 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 Online Training Library 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 at lunch meet minimum amounts required by the meal pattern.

9

10

Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily vegetable requirements were not met at lunch. Specifically, only 1/2 cup of vegetable was provided on 4/13/21, 4/14/21, and 4/15/21 and only 5/8 cup of vegetable was provided on 4/16/21 when 3/4 cup of vegetable is required daily at lunch for grades K-8. This was not determined to 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 utensils, offering additional fruits, increasing portions, 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 Online Training Library 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 Online Training Library tab. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library 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 at lunch meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.

11

Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly vegetable requirements were not met at lunch. Only 2 7/8 cups of vegetables were provided when 3 3/4 cups of vegetables are required weekly at lunch for grades K-8. This was not determined to 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 utensils, offering additional fruits, increasing portions, 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 Online Training Library 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 Online Training Library 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 vegetable quantities at lunch meet minimum amounts required by the meal pattern.

12	<p>Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly red/orange vegetable subgroup requirements and weekly other vegetable subgroup requirements were not met at lunch. Only 1/8 cup of red/orange vegetable was provided throughout the week when 3/4 cup of red/orange vegetable is required weekly at lunch for grades K–8 and only 1/4 cup of other vegetables was provided when 1/2 cup other vegetable is required weekly at lunch for grades K–8. This was not determined to be a repeat finding from cycle two and did not 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., offering additional red/orange vegetables, increasing portions, 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 Online Training Library 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 Online Training Library 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 weekly red/orange vegetable quantities and weekly other vegetable quantities at lunch meet minimum amounts required by the meal pattern.</i></p>
13	<p>The following vegetable subgroup was not offered during the review period: dark green. This was not a repeat finding from cycle two and did not contribute toward fiscal action calculations.</p>	<p>Discussed vegetable subgroup requirements for the age/grade groups served. Vegetable Subgroup Quick Guide can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning 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 Online Training Library tab. Please note that repeated violations involving vegetable subgroups may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p>	<p><i>Please provide one week of lunch production records which demonstrate compliance with the vegetable subgroups. Additionally, please provide written assurance that moving forward, all menus will be planned to meet the vegetable subgroup requirements.</i></p>
14	<p>During the week of review, all grains served at breakfast and lunch were not whole grain-rich. Specifically, tortillas were 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 https://www.azed.gov/hns/nslp/forms under the Online Training Library tab.</p>	<p><i>Please provide a written description of the changes that have been made to ensure that all grains served at breakfast and lunch are whole grain-rich.</i></p>

Production record crediting and portion sizes were inaccurate for the following:

- Breakfast loaf was recorded as 2 oz eq grain; actually credits as 1.0 oz eq grain (breakfast 4/12/21)
- Apple/orange was recorded "4 oz" portion as "1 ea." for crediting under fruit; 1 apple credits as 1 cup fruit and 1 orange credits as 1/2 cup fruit (breakfast 4/12/21)
- Cereal bar was recorded as 1.42 oz eq grain; credits as 1 oz eq grain (breakfast 4/14/21)
- Whole-grain biscuit was recorded as 2-oz portion crediting at 1-2 oz eq grain; credits as 2.0 oz eq grain (breakfast 4/16/21)
- Egg patty was recorded as 1-1.5 oz eq meat/meat alternate (M/MA); sufficient crediting documentation was not available (breakfast 4/16/21)
- Cheese slices were recorded as 2 1-oz portions; portion size for sliced cheese was 0.5 ounces (breakfast on 4/16/21)
- Taco meat was recorded as 2-oz portion crediting as 2 oz eq M/MA; 2-oz portion credits as 1.25 oz eq M/MA (lunch 4/12/21)
- Shredded lettuce was recorded as 1-oz portion crediting as 1 ounce vegetable; 1-oz portion credits as 1/4 cup vegetable (lunch 4/12/21)
- Hamburger patty was recorded as a 3-oz portion crediting as 3 oz eq M/MA; 2.8-oz patty that credits as 2.0 oz eq M/MA was served (lunch 4/13/21)
- 15 • Hamburger buns were recorded as 1–2 oz eq grain; credits as 2.0 oz eq grain (lunch 4/13/21)
- Bread was recorded as 2.5-oz portion crediting as "2-sl." grain; 2 slices crediting as 2.0 oz eq grain was served (lunch 4/14/21)
- Ham was recorded as 1-oz portion crediting as "3–1 oz" M/MA; 1-oz portion credits as 0.75 M/MA (lunch 4/14/21)
- Cheese was recorded as 1-oz portion crediting as "2–1 oz" M/MA; 1-oz portion credits as 1.0 oz eq M/MA (lunch 4/14/21)
- Nacho chips were recorded as 15-ea. portion crediting as "15 ea." grain; 15-each portion credits as 1.5 oz eq grain (lunch 4/15/21)
- Ground beef was recorded as 2-oz portion crediting as 2 oz eq M/MA; 2-oz portion credits as 1.25 oz eq M/MA (lunch 4/15/21)
- Cheese pizza was recorded as a 3-oz portion crediting as 3 oz eq grain; 1-slice (4.60-oz) portion credits as 2.0 oz eq grain, 2.0 oz eq M/MA, and 1/8 cup vegetable (lunch on 4/16/21)
- Breakfast loaf was recorded as a 2-oz portion crediting as 2.0 oz eq grain; credits as 1.0 oz eq grain (breakfast 5/20/21)
- Fresh apple was credited in ounces instead of cups (breakfast 5/20/21)
- Ham patty was recorded as 2-oz portion crediting as 2 oz eq M/MA; credits as 0.75 oz eq M/MA (lunch 5/20/21)

Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Resources can be found at <https://www.azed.gov/hns/nslp/forms> under the Menu Planning tab. Food Buying Guide for Child Nutrition Programs Interactive Web-Based Tool can be found at <https://foodbuyingguide.fns.usda.gov/>.

Please provide updated production records for 4/12/21 breakfast and lunch, 4/13/21 lunch, 4/14/21 breakfast and lunch, 4/15/21 lunch, 4/16/21 lunch, and 5/20/21 breakfast and lunch with correct portion sizes and crediting.

Production records were not site-specific. Specifically, two sites (one bus route operating Serve Only and one school operating Offer Versus Serve) were combined on one production record.

Discussed requirements surrounding site-specific production records and importance of maintaining documentation to support production at each site. ADE's Updated Fillable Production Record Template with Instructions can be found on ADE's website at <https://www.azed.gov/hns/nslp/forms> under the Menu Planning tab. Production Record Templates 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 tab.

Please provide a written description of changes that will be made to ensure production records are site specific when operating multiple sites.

16

Counting & Claiming

No findings.

Media Release

No findings.

SFA Monitoring Responsibilities

17 SFA did not conduct an off-site review at least once during the SSO operation of two sites. This monitoring requirement was not waived during the recent unanticipated school closure related to the COVID-19 pandemic.

Discussed the current requirement that monitoring shall be conducted by the sponsor at meal service sites to the maximum extent practicable, however the on-site portion of monitoring located at 7 CFR 225.15(d) has been waived through June 30, 2021.

Please provide documentation that a site review as conducted at least once during the site's operation. Additionally, please provide written assurance that site reviews will be conducted at least once during a site's operation.

Civil Rights

18 The USDA nondiscrimination statement used on program materials is not the most current USDA statement. Specifically, advertising materials did not contain the nondiscrimination statement and monthly menus did not contain the correct nondiscrimination statement.

Discussed where to find nondiscrimination statement on ADE's website at <https://www.azed.gov/hns/civilrights> and whether long or short statement would be most appropriate.

Please provide an updated program material with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.

19 The "And Justice for All" poster was not displayed in a prominent location and was not visible to all program participants. Specifically, the poster was not displayed on the mobile route.

Discussed requirements of where poster must be placed and where to find a printable "And Justice For All" poster on ADE's website at <https://www.azed.gov/hns/civilrights>. Referred to HNS 08-2019 USDA Nondiscrimination And Justice for All Poster Clarification.

Please provide pictures to demonstrate the posters are now displayed in a prominent location and visible to all program participants. Additionally, please provide written assurance that the "And Justice For All" poster has been displayed in a prominent location and visible to all program participants.

Food Safety

The written food safety plan was not site-specific. Specifically, it did not include adequate SOPs for serving non-congregate meals via mobile routes.

Discussed sample SOPs and guidelines for Critical Control Points (CCPs) found in USDA's Guidance on creating a Food Safety can be found on ADE's website at <https://www.azed.gov/hns/nslp/forms> under the Food/Health Safety tab and Lunch Assist COVID-19 Resources for Schools found on ADE's website at <https://www.azed.gov/hns/covid19> under the Resources tab.

Please provide a copy of SOPs specific to the mobile route that will be included in the written food safety plan.

20

Water

No findings.

Comments/Recommendations:

Congratulations! Naco Elementary District has completed the SSO portion of the Administrative Review for the 2020–2021 school year. It is recommended that trainings in menu compliance and production records are completed throughout the year. It is also recommended that internal compliance checks are conducted periodically in these critical areas to maintain program integrity. Thank you for your cooperation during the review process.

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

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

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 July 30, 2021 to Kariann Sadlon at Kariann.Sadlon@azed.gov or 1535 West Jefferson Street Bin #7, Phoenix, AZ 85007.



6/11/2021

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.