



## Arizona Department of Education Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Theodore Roosevelt School

CTD: 09-39-05

Site: Theodore Roosevelt School

Contacts: Marla Wilkerson, Principal and Brittne Rockwell, Receptionist

Review Date: May 26, 2021

Review Period: April 2021

Programs Reviewed:

- |   |  |   |
|---|--|---|
| <input checked="" type="checkbox"/> National School Lunch | <input checked="" type="checkbox"/> School Breakfast | <input checked="" type="checkbox"/> Afterschool Snack |
| <input type="checkbox"/> Fresh Fruit & Vegetable          | <input type="checkbox"/> Special Milk                | <input type="checkbox"/> At-Risk Afterschool Meals    |

No.	Review Observations & Findings	Technical Assistance Provided	Required Corrective Action
<b>Performance Standard 1: Certification &amp; Benefit Issuance- Critical Area</b>			

*No findings.*

#### Performance Standard 1: Meal Counting & Claiming- Critical Area

1	Breakfast and lunch service observed on the day of review did not support that reimbursable meal counts are accurate. Specifically, SFA is obtaining meal counts from leftover and tray counts. This was deemed a systemic error and contributed towards fiscal action calculations. A full recalculation of breakfasts and lunches served for the months of February, March, April, and May will be conducted in School Year 2021-2022.	Discussed methods of meal counts that are allowable (e.g., rosters and tallies) and methods of meal counts that are unallowable (e.g., tray counts and leftovers) and potential changes that could be made to ensure it doesn't continue.	<i>Please submit a detailed plan describing changes that will be made to meal counting and claiming procedures. A full recalculation of meals will be conducted using the first 30 operating days of SY 2021-2022. An updated report will be issued after the recalculation is complete.</i>
2	The meal service lines in operation did not prevent adult meals or second meals from being claimed. Specifically, counts are obtained from leftovers and tray counts which don't account for distinguishing reimbursable meals from non-reimbursable meals.	Discussed feasible changes to the system that would be implemented immediately to ensure adult meals and second meals are not included in the meal count for reimbursement.	<i>Please provide a written description of the system that has been implemented to ensure that adult meals and second meals are being documented for production purposes but are not counted toward the claim for reimbursement.</i>

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**Performance Standard 2: Meal Components & Quantities- Critical Area**

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3	<p>On the day of review, the required meal components were not available on every reimbursable meal service line to all students prior to or during breakfast service. This was non-systemic and attributed to not ordering sufficient milk to last through the end of the school year. The nonreimbursable meals were still counted and claimed. This contributed toward fiscal action calculations.</p>	<p>Discussed importance of ordering sufficient food and milk to serve at every meal service throughout the entire school year.</p>	<p><i>Please provide a written description of the changes that have been made to ensure that all required meal components are available on every reimbursable meal service line to all students.</i></p>
4	<p>During the day of review, all grains served at breakfast and lunch were not whole grain-rich. Specifically, the bread served at breakfast and lunch was 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 and lunch production records and supporting documentation (Product Formulation Statements, ingredient lists, Nutrition Facts labels, etc.) that demonstrate all grains served at breakfast and lunch were whole grain-rich.</i></p>
5	<p>Fluid milk was not available in at least two varieties at lunch on the day of review. Specifically, only non-fat, flavored milk was provided at lunch due to lack of ordering sufficient quantities of milk to get through the end of the school year. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations.</p>	<p>Discussed variety requirement and feasible options for compliance. Allowable milk varieties include 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><i>Please provide one week of lunch production records that demonstrate that fluid milk was available in at least two varieties. Additionally, please provide written assurance that fluid milk will always be available in at least two varieties at lunch.</i></p>
6	<p>Fluid milk was not available in at least two varieties at breakfast during the review period. Specifically, only low-fat, unflavored milk was provided at breakfast. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations.</p>	<p>Discussed variety requirement and feasible options for compliance. Allowable milk varieties include 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><i>Please provide one week of breakfast production records that demonstrate that fluid milk was available in at least two varieties. Additionally, please provide written assurance that fluid milk will always be available in at least two varieties at breakfast.</i></p>
7	<p>During the week of review, all grains served at breakfast and lunch were not whole grain-rich. Specifically, the bread served at breakfast was not whole grain-rich and the hamburger bun, cornbread loaf, and hot dog bun served at lunch 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 <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 and lunch production records and supporting documentation (Product Formulation Statements, ingredient lists, Nutrition Facts labels, etc.) that demonstrate all grains served at breakfast and lunch were whole grain-rich.</i></p>

<p>The following product could not be credited towards the meal pattern due to insufficient documentation: Sausage Links served at breakfast on 4/14/21.</p>	<p>Discussed requirements regarding processed product documentation and provided examples. USDA Food Fact Sheets can be found 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 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 Child Nutrition (CN) label and/or Product Formulation Statement (PFS) for Sausage Links. Additionally, 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.</i></p>
<p>8</p> <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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning tab. The Step-by-Step Instruction: How to Plan a Lunch 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 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>
<p>9</p> <p>Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily vegetable quantity requirements were not met on 4/13/21; 1/4 cup vegetable was provided when 3/4 cup vegetable is required for grades K-8. This was determined to be a repeat finding from cycle two and contributed 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., increasing portions, maintaining standardized recipes, etc.). 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. The Step by Step Instruction: How to Plan a Lunch 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 Online Training Library tab. The Using Appropriate Serving Utensils 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 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 vegetable quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.</i></p>
<p>10</p>		

<p>11</p>	<p>Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily meat/meat alternate quantity requirements were not met on 4/13/21 (unable to determine quantity provided due to lack of standardized recipe for Beef Chili with Beans) and 4/14/21 (0.75 oz eq meat/meat alternate was provided when at least 1.0 oz eq meat/meat alternate is required for grades K-8). This was determined to be a repeat finding from cycle two and contributed 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., increasing portion sizes, creating and maintaining standardized recipes, etc.). 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/forms">http://www.azed.gov/hns/nslp/forms</a> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Lunch 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 Online Training Library tab. The Using Appropriate Serving Utensils 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 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 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.</i></p>
<p>12</p>	<p>Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly meat/meat alternate quantity requirements were not met during the week of review. This was determined to be a repeat finding from cycle two and contributed 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., increasing portion sizes, creating and maintaining standardized recipes, etc.). 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/forms">http://www.azed.gov/hns/nslp/forms</a> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Lunch 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 Online Training Library tab. The Using Appropriate Serving Utensils 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 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 meat/meat alternate quantities meet minimum amounts required by the meal pattern.</i></p>

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**Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area**

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*No findings.*

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**Meal Access & Reimbursement: Certification & Benefit Issuance**

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No findings.

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**Meal Access & Reimbursement: Verification**

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No findings.

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**Meal Access & Reimbursement: Meal Counting & Claiming**

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13 Daily edit checks are not being conducted appropriately. Specifically, the attendance factor on the daily edit check does not match the attendance factor on the monthly reimbursement claims.	Discussed how to complete daily edit checks using ADE's Daily Edit Check worksheet. The Daily Edit Check Worksheet can be found on ADE's website <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational tab. The Step by Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab.	<i>Please provide a completed daily edit check worksheet for the month of May . Additionally, please provide written assurance that daily edit checks will be updated annually to reflect the current year's attendance factor.</i>
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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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No findings.

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**Meal Pattern & Nutritional Quality: Meal Components & Quantities**

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14 Signage which explains what constitutes a reimbursable meal was not displayed to students at 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning tab.	<i>Please provide the sign that will be displayed to students that demonstrates what constitutes a reimbursable meal at lunch. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i>
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**Resource Management**

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15 Meals served to teachers, administrators, custodians, and other adults were not priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or payroll funds, or funding from voluntary agencies) was sufficient to cover the overall cost of the meal. Specifically, no payment is collected for meals provided to adults.	Discussed ways to determine adult meal prices which included pricing adult meals to reflect the amount of reimbursement received for a free meal plus the per meal value of entitlement and bonus commodities.	<i>Please provide a written description of the steps which have been taken to collect payment for adult meals as well as the exact formula used to price adult meals.</i>
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**General Program Compliance: Civil Rights**

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No findings.

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**General Program Compliance: SFA On-Site Monitoring**

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No findings.

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**General Program Compliance: Local Wellness Policy**

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16	A recent assessment of the implementation of the Local Wellness Policy (LWP) has not been conducted nor have plans been developed to complete the assessment.	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 at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals tab. Also discussed feasible means for notifying the public of the results of the most recent assessment.	<i>None required at this time.</i>
17	The public was not notified of the results of the most recent assessment of the implementation of the Local Wellness Policy (LWP).	Discussed requirement to make the most recent assessment available to the public. Also discussed feasible means for notifying the public of the results of the most recent assessment on the implementation of the LWP. The USDA's Local Wellness Policy Outreach Toolkit can be found at <a href="https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit">https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit</a> .	<i>None required at this time.</i>

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**General Program Compliance: Competitive Food Services**

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*No findings.*

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**General Program Compliance: Professional Standards**

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*No findings.*

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**General Program Compliance: Water**

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*No findings.*

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**General Program Compliance: Food Safety, Storage and Buy American**

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18	The most recent food safety inspection report was not posted in a publicly visible location.	Discussed making copies of most recent report and feasible places for posting.	<i>Please provide written assurance that the most recent food safety inspection report has been posted in a location where the program participants can view it. Additionally, please specify where the report has been posted.</i>
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**General Program Compliance: Reporting & Recordkeeping**

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19	The Annual Financial Report was not submitted to ADE on time.	Discussed reporting requirements for Annual Financial Report and who would be responsible for submitting.	<i>Please provide written assurance that the Annual Financial Report will be submitted on time to ADE as is required by October 1 each year, as well as the steps that will be taken to ensure this requirement is adhered to.</i>
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Standardized recipes were not maintained. Specifically, standardized recipes were not on hand for Beef Chili with Beans served at lunch on 4/13/21, Spaghetti and Meatballs served at lunch on 4/14/21, Sausage Gravy served at breakfast on 5/26/21, and Macaroni & Cheese served at lunch on 5/26/21.

Discussed all menu items that contain more than 1 ingredient must have a standardized recipe. Standardized recipes must include the following information: recipe name, recipe number, ingredients and amounts, serving size, recipe yield, preparation instructions, HACCP process, and HACCP instructions. Examples of standardized recipes can be found on ADE's website at <https://www.azed.gov/hns/nslp/forms> under the Menu Planning tab.

*Please provide an updated recipe for Beef Chili with Beans, Spaghetti and Meatballs, Sausage Gravy, and Macaroni & Cheese. Additionally, please provide written assurance that all menu items that contain more than 1 ingredient will have a standardized recipe on file.*

Production records for breakfast and lunch were not filled out correctly. Specifically, recipe numbers were filled out when recipes were not utilized, portion size was not reflective of actual portion on multiple days, prepped servings did not show how many servings were actually prepared, portions served did not indicate how many portions were served, the leftover servings column was not consistently completed, 2nd meals and adult meals were not consistently completed, and total reimbursable meals were not accurate on multiple days.

Discussed required sections of production records. 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. Production Record Template 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 copies of completed breakfast and lunch production records for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years. Additionally, the certificate of completion of Production Record Overview must be provided.*

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

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*No findings.*

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**Other Federal Program Reviews: Afterschool Snack Program**

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*Not applicable.*

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**Other Federal Program Reviews: Seamless Summer Option**

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Will be reviewed in Summer 2021 if applicable.

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**Other Federal Program Reviews: Fresh Fruit & Vegetable Program**

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*Not applicable.*

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**Other Federal Program Reviews: Special Milk Program**

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*Not applicable.*

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**Other Federal Program Reviews: At-Risk Afterschool Meals**

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*Not applicable.*

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Comments/Recommendations:

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Congratulations! Theodore Roosevelt School has completed 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.

**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?

- |                                   |                                    |  |
|-----------------------------------|------------------------------------|--|
| <input type="checkbox"/> No- SBP  | <input type="checkbox"/> Yes- SBP  | TBD after fiscal recalculation in SY 21-22 |
| <input type="checkbox"/> No- NSLP | <input type="checkbox"/> Yes- NSLP | TBD after fiscal recalculation in SY 21-22 |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by August 30, 2021 to [Kariann Sadlon@azed.gov](mailto:Kariann.Sadlon@azed.gov) or 1535 West Jefferson Street Bin #7, Phoenix, AZ 85007.



6/16/2021

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.

Equity for all students to achieve their full potential  
www.azed.gov – (602) 542-8700 – 1535 West Jefferson Street • Phoenix, Arizona 85007 Bin # 7  
This institution is an equal opportunity provider