



## Arizona Department of Education Health and Nutrition Services Division

### Seamless Summer Option Administrative Review Summary Report

Sponsor: Espiritu Community Development Corp.

CTD: 07-87-11

Sites: Central Kitchen (Grab & Go) - Espiritu Community Development Corp. and NFL YET College Preparatory Academy

Contact: Armando Ruiz, Superintendent and Fernando Ruiz, Food Service Director

Review Date: February 16–17, 2021

Review Period: January

Review Type:  SSO

No.	Review Findings	Technical Assistance Provided	Required Corrective Action
<b>SFA Operations</b>			
1	<p>The Multiple Days Meal Distribution Plan for SSO was not submitted to ADE prior to distributing meals for multiple days. Specifically, the Multiple Days Meal Distribution Plan for SSO was submitted on 12/29/2020 for a 8/3/2020 start date.</p>	<p>Discussed the non-congregate feeding, meal times and parent/guardian pickup waivers allow for SFAs to provide food items in bulk and to distribute meals for multiple days for pickup or delivery. To distribute meals for multiple days, USDA has instructed ADE to assess the SFA's capacity to execute such an approach effectively. Additionally, discussed ADE has created a Multiple Days Meal Distribution Plan Form for SFAs to provide details on how the distribution plan will be executed. SFAs only need to submit their distribution plan once for SY 20-21. The form must be submitted before the SFA distributes meals for multiple days. ADE will provide technical assistance and request clarification if a distribution plan does not demonstrate the SFA's capacity to provide meals for multiple days. Referred to HNS 33-2020 Procedures for Opting into National School Lunch Program (NSLP) Meal Pattern and Parent/Guardian Pickup Waivers and Providing Meals for Multiple Days in SY 20-21 found on ADE's website at <a href="https://www.azed.gov/hns/nslp/snp/covid/">https://www.azed.gov/hns/nslp/snp/covid/</a>.</p>	<p>Please provide written assurance that, moving forward, any new or updated Multiple Days Meal Distribution Plans will be submitted to ADE prior to implementation.</p>

Observation: SFA's Multiple Meals Distribution Plan stated: "All daily and weekly prepackaged meals have individuals instructions on heating, cooking and refrigerating food inside the wrapping in english and spanish." Although heating and cooking instructions for frozen foods are provided when distributing multiple days of meals, cold-holding instructions are not provided.

Discussed USDA's guidance for providing multiple meals at a time during the Coronavirus pandemic. Specifically discussed that Program operators are encouraged to help parents and guardians identify which foods require refrigeration, cooking, or heating for food safety. Examples of strategies include labeling foods that require refrigeration or freezing and providing a list of foods that require refrigeration, freezing, and heating.

*No corrective action required.*

The Parent/Guardian Pickup Waiver Form for SSO was not submitted to ADE prior to the SFA implementing parent/guardian pickups. Specifically, the Parent/Guardian Pickup Waiver for SSO was submitted on 5/8/2020 for a 3/16/20 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 HNS 33-2020 Procedures for Opting into National School Lunch Program (NSLP) Meal Pattern and Parent/Guardian Pickup Waivers and Providing Meals for Multiple Days in SY 20-21 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 Waiver Forms will be submitted to ADE prior to implementation.

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**Site Agreement**

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*No findings.*

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**Site Eligibility**

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*No findings.*

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### Menu Planning

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3	Documentation did not support that all required meal components were offered and served during the review period. Specifically, no grain was provided at breakfast on 1/9/21 at Central Kitchen (Grab & Go) - Espiritu Community Development Corp. This contributed toward fiscal action calculations.	Discussed requirements for meal pattern requirements for the grade groups served. Discussed missing items and potential changes that could be made to ensure it doesn't continue (e.g., offering a grain that credits as at least 1.0 ounce equivalent whenever crediting a meat/meat alternate at breakfast).  <i>Please provide a written description of the changes that have been made to the breakfast menu to bring it into compliance with the meal pattern requirements.</i>
4	Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly grain quantities were not met at breakfast at Central Kitchen (Grab & Go) - Espiritu Community Development Corp. This was not a repeat finding from cycle two and therefore 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., offering a grain that credits as at least 1.0 ounce equivalent whenever crediting a meat/meat alternate at breakfast). 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).
5	Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, minimum weekly red/orange vegetable subgroup quantities for grades 9-12 were not met at NFL YET College Prep Academy. This was not a repeat finding from cycle two and therefore 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 red/orange vegetable servings throughout week). 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 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).

Production records for breakfast and lunch at Central Kitchen (Grab & Go) - Espiritu Community Development Corp. are not completed correctly. Specifically, production records are completed based on meal count rather than actual amount of servings planned, prepped, left over, and used.

Discussed importance of staff completing production records before meal service to document the actual amount of items served and after meal service to record the actual amount of items left over.

*Please provide a written description of the changes that have been made to procedures for completing production records to ensure items served and items left over are accurately recorded.*

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**Counting & Claiming**

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Separate meal counts were not taken per meal service. Specifically, breakfast and lunch counts were combined onto one count sheet at Central Kitchen (Grab & Go) - Espiritu Community Development Corp.

Discussed that counting records for meals served must align to the day the meal is intended to be consumed.

*Please provide a written description of changes to the system that have been implemented to ensure that meal service counts are recorded separately per meal provided.*

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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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*No findings.*

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**Food Safety**

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*No findings.*

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**Water**

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*No findings.*

Comments/Recommendations:

Congratulations! Espiritu Community Development Corp. has completed the SSO portion of the Administrative Review for the 2020-2021 school year. Thank you for your hospitality and sense of urgency during the review process. Your team works marvelously together while implementing the Seamless Summer Option of the National School Lunch Program. It is evident that you are working hard to ensure the children in your community are fed healthy meals in a welcoming environment.

Fiscal Action Assessed?

- |   |  |            |
|---|--|------------|
| <input type="checkbox"/> No- SBP                  | <input type="checkbox"/> Yes- SBP                |            |
| <input type="checkbox"/> No- NSLP                 | <input type="checkbox"/> Yes- NSLP               |            |
| <input type="checkbox"/> No - SSO SBP             | <input checked="" type="checkbox"/> Yes- SSO SBP | \$3,390.00 |
| <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 April 21, 2021 to Kariann Sadlon at Kariann.Sadlon@azed.gov or 1535 West Jefferson Street Bin #7, Phoenix, AZ 85007.



3/5/2021

Reviewer Signature

Date



3/5/2021

Program Director 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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www.azed.gov – (602) 542-8700 – 1535 West Jefferson Street • Phoenix, Arizona 85007 Bin # 7  
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