



**Arizona Department of Education
Health and Nutrition Services Division**

Administrative Review Summary Report

School Food Authority Name: Cholla Academy

CTD: 07-89-95

Site: Westland School Brighton Campus

Contacts: Kathy Couch, Director / Stephanie Burgess, Food Program Director

Review Date: December 9, 2021

Review Period: November, 2021

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

1	Meal count totals by category for the month of review were not correctly combined and recorded. Due to using a manual meal counting system, it was determined that human error resulted in underclaiming 1 lunch and 3 breakfasts in the month of November. This was deemed a non-systemic error 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.	<i>Please provide a written description of changes to the system that have been implemented to ensure that meal service lines provide an accurate count.</i>
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Performance Standard 2: Meal Components & Quantities- Critical Area

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| 2 | Quantities observed during the review period did not meet minimum amounts required by the meal pattern for grades K-8. Specifically, the minimum weekly quantity of the beans/peas (legumes) subgroup was not met during the review period. This was determined not to be a repeat finding and will 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, recipes, 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 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). | <i>Please provide a written description of the changes that have been made to ensure that beans/peas vegetable quantities meet minimum amounts required by the meal pattern.</i> |
| 3 | Quantities observed during the review period did not meet minimum amounts required by the meal pattern for grades 9-12. Specifically, the minimum weekly quantity of the beans/peas (legumes) subgroup was not met during the review period. This was determined not to be a repeat finding and will 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, recipes, 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 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). | <i>Please provide a written description of the changes that have been made to ensure that beans/peas vegetable quantities meet minimum amounts required by the meal pattern.</i> |

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

No Findings

Meal Access & Reimbursement: Certification & Benefit Issuance

No Findings

Meal Access & Reimbursement: Verification

No Findings

Meal Access & Reimbursement: Meal Counting & Claiming

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| 4 | The site application in CNPWeb does not accurately reflect the sites' program participation. Specifically, the SNPWeb applications indicate that Westland School and Westland School Brighton Campus are participating in the Afterschool Care Snack Program, however, they are not currently participating. | Advised SFA to update site application in CNPWeb and contact their assigned specialist to let them know of the changes. | <i>Please submit new site applications in CNPWeb that accurately reflects the sites' program participation. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i> |
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Meal Pattern & Nutritional Quality: Offer Versus Serve

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| 5 | Signage which explains what constitutes a reimbursable meal for Offer Versus Serve and includes the requirement to select 1/2 cup fruit or vegetable was not displayed to 9-12 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 https://www.azed.gov/hns/nslp/forms under the Menu Planning tab. | <i>Please provide the sign that has been displayed explaining what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable. Additionally, please provide written assurance that this sign will be displayed for 9-12 students to see.</i> |
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Meal Pattern & Nutritional Quality: Meal Components & Quantities

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| 6 | Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast nor 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 sign that will be displayed to students that demonstrates what constitutes a reimbursable meal at breakfast and lunch. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i> |
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Resource Management

No Findings

General Program Compliance: Civil Rights

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| 7 | The public/media release provided to local media, the unemployment office and local employers considering large layoffs did not contain all required sections. | Discussed required sections of the public/media release. Referred to the template release that can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Outreach tab. | <i>Please provide a copy of updated public media/release template which demonstrates compliance. Additionally, please provide written assurance that the public/media release provided to local media, the unemployment office and local employers considering large layoffs will contain all required sections.</i> |
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| <p>8 Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, procedures the procedures indicate that the site administrator / governing board would attempt to resolve the complaint themselves.</p> | <p>Discussed procedures for receiving and processing complaints, and identifying the outside agency where complaints are forwarded (i.e., SA, FNSRO, 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. The SFA staff member receiving the allegation must transcribe the complaint. The SFA's procedures for receiving a complaint cannot prevent it from being accepted. 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. 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 Online Training Library tab.</p> | <p><i>Please provide a written description of the updated process and procedures for processing complaints alleging discrimination which meets requirements. Additionally, the certificate of completion of Step-by-Step Instruction: How to File a Civil Rights Complaint must be submitted.</i></p> |
| <p>9 Sufficient documentation to support accommodations for special diets has not been maintained. Specifically, a medical statement for a student with a special dietary need was not maintained on file to support the accommodations taking place.</p> | <p>Discussed requirements for accommodating special diets and the need for sufficient documentation. Referred to Medical Statement for Students with Special Dietary Accommodations found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational tab. Additionally, referred to Accommodating Children with Disabilities in the School Meal Program found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals tab. Step-by-Step Instruction: How to Complete the Medical Statement for Students with Special Dietary Accommodations can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library tab.</p> | <p><i>Please provide written procedures for maintaining documentation supporting accommodations for special diets and written assurance that sufficient documentation to support accommodations for special diets will be maintained. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete the Medical Statement for Students with Special Dietary Accommodations must be submitted.</i></p> |

General Program Compliance: SFA On-Site Monitoring

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| 10 | The SFSP monitoring forms have been completed this school year. However, the NSLP and SBP on-site monitoring forms are required to be completed by February 1. | Discussed requirement and where to find template internal on-site monitoring forms for breakfast and lunch on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational tab. Discussed who would be responsible for completing this each year. | <i>Please provide a completed Internal On-Site Monitoring Form for Breakfast and Lunch. Additionally, please provide a written description of the process that has been put in place to ensure that all sites receive an on-site review of the meal counting and claiming procedures each year prior to February 1.</i> |
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General Program Compliance: Local Wellness Policy

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| 11 | The review and update of the Local Wellness Policy (LWP), as specified in the policy itself, is not occurring nor is documentation being kept on file to support this. | Discussed why the review and update is not occurring and what can be done to ensure this occurs as specified in the LWP. Discussed maintaining records to document compliance. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Tab. | <i>None required at this time.</i> |
| 12 | Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the Local Wellness Policy (LWP). | Discussed feasible means of notifying potential stakeholders of their ability to participate. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Tab. | <i>None required at this time.</i> |

General Program Compliance: Competitive Food Services

No Findings

General Program Compliance: Professional Standards

No Findings

General Program Compliance: Water

No Findings

General Program Compliance: Food Safety, Storage and Buy American

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| 13 The written food safety plan did not contain all required elements. The food safety plan has not been customized to each site's meal service operations. Additionally, the food safety plan is missing a description of the school facility and equipment. | 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. | <i>Please provide a copy of the updated food safety plans for Westland School and Westland School Brighton Campus.</i> |
| 14 A copy of the written food safety plan was not made available each site. | Discussed that this should be easily available at each food preparation and food service site and that staff should be aware of its existence. | <i>Please provide written assurance that a copy of the written food safety plan has been made available at each site.</i> |
| 15 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools and at off-site storage facilities: Suncup juice. Specifically, a single Buy American exception tracking form is being maintained for all Suncup juices. | Discussed the Buy American provision requirements and procedures to ensure compliance. Referred to SP38-2017, Buy American Webinar and FAQ. 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. Buy American Recorded Webinar and FAQ can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library tab. | <i>Please provide a written description of the changes that have been made to procurement and/or recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i> |

General Program Compliance: Reporting & Recordkeeping

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| 16 Production records for lunch on 11/2/21 were not updated to reflect menu changes. Chicken tenders were planned, however, chicken nuggets were served. | Discussed required sections of production records and importance of accurate recordkeeping. 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. | <i>Please provide written assurance that production records will be updated to reflect menu changes in the future.</i> |
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General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach

17	Households were not notified of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year.	Discussed methods of notifying families of the availability of the SFSP prior to the end of the school year and determined which was most feasible. Summer feeding locations can be found at https://www.azhealthzone.org/ .	<i>Please provide a description of how households will be notified of the availability of the SFSP prior to the end of the school year and written assurance that this will occur. If you do not plan to operate the SFSP and no other entities reasonably close to your sites operate the SFSP, please provide a description of other community resources that will be provided to households prior to the end of the school year.</i>
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Other Federal Program Reviews: Afterschool Snack Program

Not Reviewed

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2022 if applicable.

Other Federal Program Reviews: Fresh Fruit & Vegetable Program

Not Reviewed

Other Federal Program Reviews: Special Milk Program

Not Reviewed

Other Federal Program Reviews: At-Risk Afterschool Meals

Not Reviewed

Comments/Recommendations:

Congratulations on completing the Administrative Review for school year 2021-2022! Thank you for your hospitality, prompt responses, and organization during the review process. Your hard work to provide nutritious meals to students is evident!

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.

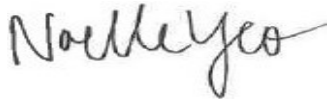
Training: In-person classes, Web-based training and How-To guides can be found on ADE's website at <https://www.azed.gov/hns/nslp/training>.

Fiscal Action Assessed?

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

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by January 28, 2022 to Noelle Yeo at Noelle.Yeo@azed.gov



12/21/2021

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.

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