



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

Administrative Review Summary Report

School Food Authority Name: Camelback Education, Inc.

CTD: 07-89-59

Site: Camelback Academy

Contacts: Karen Kordon, Executive Director and Sharie Banbury, Food Service Director

Review Date: December 14, 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

Not applicable.

Performance Standard 1: Meal Counting & Claiming - Critical Area

No findings.

Performance Standard 2: Meal Components & Quantities - Critical Area

<p>Policy for providing meals during field trips does not meet minimum amounts required by the meal pattern. Specifically, policy states that field trip meals will include 1/2 cup vegetable when a minimum of 3/4 cup vegetable is required. This did not contribute toward fiscal action calculations as field trips are not occurring this school year.</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., changes to field trip meal 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. 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).</p>	<p><i>Please provide an updated written policy for field trip meals that includes minimum quantities to be provided for each meal component.</i></p>
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<p>Portion sizes observed during the month of review did not meet minimum amounts required by the breakfast meal pattern. Specifically, on 11/1/21 and 11/29/2021, Ultimate Breakfast Rounds crediting as 0.75 ounce equivalent of grain were served with a cheese stick crediting as 1.0 ounce equivalent of meat/meat alternate. Meat/meat alternates may not be counted toward the grain component until</p> <p>2 after the minimum daily grains requirement (1.0 ounce equivalent) is offered. This was not a repeat finding from the previous review cycle and therefore 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., offering a grain that credits as at least 1.0 ounce equivalent or serving an additional grain instead of a meat/meat alternate). 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 Meal Pattern 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.</p>	<p><i>Please provide one week of breakfast production records which demonstrates that at least 1.0 equivalent of grains was offered prior to crediting meat/meat alternates toward the grain component. Additionally, please provide a written description of the changes that have been made to ensure that at least 1.0 ounce equivalent of grain will be offered prior to crediting meat/meat alternates toward the grain component.</i></p>
<p>Quantities observed on the during the month of review did not meet minimum amounts required by the meal pattern. Specifically, daily minimum fruit quantities at breakfast were not met on 11/2/21; only 7/8 cup of fruit was offered when 1 cup of fruit is required daily. This was not a repeat finding from the previous review cycle and therefore did not contribute toward fiscal action calculations.</p> <p>3</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., purchasing different products, increasing portion sizes, 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 Meal Pattern 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. 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.</p>	<p><i>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.</i></p>
<p>Quantities observed on the during the month of review did not meet minimum amounts required by the meal pattern. Specifically, weekly minimum fruit quantities at breakfast were not met; only 3 7/8 cups of fruit was offered when 4 cups of fruit are required weekly. This was not a repeat finding from the previous review cycle and therefore did not contribute toward fiscal action calculations.</p> <p>4</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., purchasing different products, increasing portion sizes, 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 Meal Pattern 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. 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.</p>	<p><i>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.</i></p>

5 The following entree could not be credited towards the meal pattern due to insufficient documentation: Mandarin Chicken. Specifically, the Product Formulation Statement provided credits the product in weight and the recipe reflects the product's portion size in volume (1/2 cup); further, the SFA was unable to support the weight of the 1/2 cup portion of Mandarin Chicken. Without the weight of the provided portion, the reviewer was unable to determine if the quantity requirements were met. This was not a repeat finding from the previous review cycle and therefore did not contribute toward fiscal action calculations.

Discussed strategies for writing recipes using processed products and navigating weight versus volume. regarding processed product. 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 recipe for Mandarin Chicken that specifies how much the provided portion weighs. If unable to obtain the information necessary to credit the meat/meat alternate, please provide written assurance that the product will no longer be offered/served to students. Additionally, please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation.

6 Quantities observed on the during the month of review did not meet minimum amounts required by the meal pattern. Specifically, weekly minimum meat/meat alternate quantities at lunch were not met; only 6.75 ounce equivalents of meat/meat alternate could be credited when 7.0 ounce equivalents of meat/meat alternate are required weekly. This was not a repeat finding from the previous review cycle 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., calculating how recipes credit toward the meal pattern, 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. 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 crediting documentation is obtained to support weekly meat/meat alternate quantities at lunch meet minimum amounts required by the meal pattern.

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

7 Fluid milk was not available in at least two varieties at breakfast. Specifically, only low-fat, unflavored milk was provided to K-5 students served in the classrooms. This was not a repeat finding from the previous review cycle and therefore did not contribute toward fiscal action calculations.

Discussed variety requirement and feasible options for compliance (e.g., putting two variety options inside breakfast coolers). Allowable milk varieties are fat-free unflavored, fat-free flavored, and low-fat unflavored. Please note that repeated violations involving milk requirements may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).

Please provide a written description of changes that have been implemented to ensure that two varieties of milk are available to all students at breakfast. Additionally, please provide written assurance that fluid milk will always be available in at least two varieties at breakfast.

<p>On the day of review, it was observed that 2 breakfasts counted for reimbursement were not reimbursable. Specifically, one breakfast that only contained milk was counted for reimbursement and one breakfast that a student refused was counted for reimbursement. This 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., adjusting BIC service so that components are placed next to the teacher in order to properly identify reimbursable meals and training teachers to ensure students are not forced to take meals they do not intend on consuming). Discussed how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. The Recognizing a Reimbursable Breakfast Meal at the Point of Service Recorded Webinar & Webinar Slides can be found on ADE's website at https://www.azed.gov/hns/nsip/training 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 meals counted for reimbursement contain the required meal components during Breakfast in the Classroom. Additionally, please provide a written description of the changes that have been made to ensure that students are able to refuse meals if they do not want them.</i></p>
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Meal Access & Reimbursement: Certification & Benefit Issuance

Not applicable.

Meal Access & Reimbursement: Verification

Not applicable.

Meal Access & Reimbursement: Meal Counting & Claiming

<p>Daily edit checks are not being conducted appropriately. Specifically, eligible participants are split into eligibility categories when meals served in the cafeteria are all being claimed as free. Additionally, the attendance factor being utilized does not match the claims.</p>	<p>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 https://www.azed.gov/hns/nsip/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/nsip/training under the Online Training Library tab.</p>	<p><i>Please provide a completed daily edit check worksheet for the month of December. Additionally, please provide written assurance that daily edit checks will be conducted appropriately moving forward. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete Daily Edit Checks must be submitted.</i></p>
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Meal Pattern & Nutritional Quality: Offer Versus Serve

<p>Offer versus Serve (OVS) was not implemented properly. Specifically, students were sent back to the line to get more food when they already had a reimbursable meal.</p>	<p>Provided technical assistance on proper implementation of OVS and discussed with kitchen and point of service staff. Reviewed menu and discussed options for a reimbursable meal under OVS. USDA's Offer Versus Serve Manual, Effective beginning School Year 2015-2016 can be found on ADE's website at https://www.azed.gov/hns/nsip under the Guidance Manuals tab.</p>	<p><i>Please provide a written description of changes that have been implemented to ensure that students are able to refuse items while operating Offer versus Serve (OVS). Additionally, please provide written assurance that OVS will be implemented properly moving forward.</i></p>
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Meal Pattern & Nutritional Quality: Meal Components & Quantities

No findings.

Resource Management

No findings.

General Program Compliance: Civil Rights

11 The USDA nondiscrimination statement was not printed on appropriate program materials. Specifically, the nondiscrimination statement was not on Breakfast in the Classroom outreach letters sent to households.	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.	<i>Please provide an updated program material with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials will contain the nondiscrimination statement moving forward.</i>
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General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

12 The Local Wellness Policy (LWP) did not contain policies for food and beverage marketing.	Discussed updating the LWP to include policies that allow marketing and advertising of only those foods and beverages that meet Smart Snacks Standards during the school day. Explained that this requirement applies to exterior vending machines, posters, menu boards, coolers, trash cans and cups used for beverage dispensing. 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/nsfp/training under the Online Training Tab.	<i>None required at this time.</i>
13 Documentation to support how stakeholders are made aware of their ability to participate in the development, review, update and implementation of the Local Wellness Policy (LWP) was not provided.	Discussed feasible means of notifying potential stakeholders of their ability to participate. Discussed requirement to maintain documentation of efforts including screenshots of website postings. 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/nsfp/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

14	Temperatures are not consistently taken by using thermometers located inside of storage areas. Specifically, temperatures were recorded without use of an internal thermometer on the day of review.	Discussed taking temperatures from inside of the storage areas for a more accurate reading. Referred to Arizona's School Food Safety Guidance found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Food/Health Safety tab. Additionally, discussed Food Safety Online Courses can be found on ICN's website at https://theicn.org/icn-resources-a-z/food-safety/ .	<i>Please provide written assurance that storage area temperatures will be taken utilizing thermometers located inside of storage areas, not outside of storage areas.</i>
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General Program Compliance: Reporting & Recordkeeping

15	The site application in CNPWeb does not accurately reflect current practices. Specifically, it states that meals are served to adults who do not work for the food program when meals are not being served to adults who do not work for the food program.	Advised SFA to update site application in CNPWeb and contact their assigned specialist to let them know of the changes.	<i>Please submit a new site application in CNPWeb that accurately reflects adult meal information. 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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General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach

No findings.

Other Federal Program Reviews: Afterschool Snack Program

16	Production records do not support that the Afterschool Care Snack Program (ASCSP) meal pattern was met on the following dates: 11/08/2021. Specifically, only 1/2 cup of fruit was provided when a minimum of 3/4 cup of fruit is required.	Discussed the meal pattern requirements of the ASCSP. The ASCSP 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 ASCSP production records for 5 consecutive days that demonstrate that the ASCSP meal pattern requirements have been met. Additionally, please provide written assurance that the ASCSP meal pattern will be adhered to at all times.</i>
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Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2022 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! Camelback Education, Inc. has completed the Administrative Review for the 2020-2021 school year. Thank you for your hospitality throughout the review process. It is recommended that the critical areas of the program (meal counting and claiming and meal pattern) are monitored internally to ensure ongoing compliance.

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 \$4.93
 No- NSLP Yes- NSLP

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by February 2, 2022 to Kariann Sadlon at Kariann.Sadlon@azed.gov.



1/4/2022

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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