



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

**Administrative Review Summary Report**

School Food Authority Name: Pinon Community School Board

CTD: 09-39-15

Site: Bus Route #2 - Pinon Community School and Bus Route #4 - Pinon Community School

Contacts: Joe Benally, Principal ; Carol Nelwood, Business Manager

Review Date: November 29, 2021

Review Period: October 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>1 The day of meal observation was November 29, 2021 for Bus Route #2 - Pinon Community School and Bus Route #4 - Pinon Community School. Lunch meals intended to be consumed on Day 2 and 3 of the five day distribution do not meet minimum daily vegetable quantity requirements for the K-8 meal pattern. This is not a repeat finding and will not contribute toward FA calculations.</p>	<p>Discussed when processed products are used in Child Nutrition Programs to meet the meal pattern requirement, the product's contributions must be determined. CN Labels and/or Product Formulation Statements provide valuable crediting information; and only these will be accepted as proper crediting documentation. 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. 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>.</p>	<p><i>Please provide a written description of the changes that have been made to ensure that Vegetable quantities meet minimum amounts required by the meal pattern.</i></p>
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| 2 | During observation of the review period of Bus Route #2 - Pinon Community School and Bus Route #4 - Pinon Community School, the following recipe and accompanying ingredients could not be credited towards the breakfast meal pattern due to insufficient documentation: Blue Corn Mush. As a result, daily and weekly grain quantities were insufficient. This is not a repeat finding and will not contribute toward FA calculations                      | Discussed when processed products are used in Child Nutrition Programs to meet the meal pattern requirement, the product's contributions must be determined. CN Labels and/or Product Formulation Statements provide valuable crediting information; and only these will be accepted as proper crediting documentation. The CN Labels and Product Formulation Statements Recorded Webinar & 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. 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> . | <i>Please provide one week of breakfast 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 grain requirements.</i> |
| 3 | During observation of the review period of Bus Route #2 - Pinon Community School and Bus Route #4 - Pinon Community School, The following recipes and accompanying ingredients could not be credited towards the lunch meal pattern due to insufficient documentation: WG Fry Bread, Grilled Chicken Sandwich. As a result, daily and weekly grain quantities were insufficient. This is not a repeat finding and will not contribute toward FA calculations | Discussed requirements regarding processed product documentation and provided examples.  | <i>Please provide a written description of the changes that have been made to ensure that grain quantities meet minimum amounts required by the meal pattern.</i>   |
| 4 | During observation of the review period of Bus Route #2 - Pinon Community School and Bus Route #4 - Pinon Community School, The following recipes and accompanying ingredients could not be credited towards the lunch meal pattern due to insufficient documentation: Lamb Stew, Grilled Chicken Sandwich. As a result, daily and weekly M/MA quantities were insufficient. This is not a repeat finding and will not contribute toward FA calculations     | Discussed requirements regarding processed product documentation and provided examples.  | <i>Please provide a written description of the changes that have been made to ensure that M/MA quantities meet minimum amounts required by the meal pattern.</i>  |

5	<p>During observation of the review period of Bus Route #2 - Pinon Community School and Bus Route #4 - Pinon Community School, The following vegetable subgroup was not offered in a sufficient quantity during the review period: Red/Orange. This is not a repeat finding and will not contribute toward FA 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>
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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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6	<p>Daily edit checks are not being conducted appropriately for Bus Route #2 - Pinon Community School and Bus Route #4 - Pinon Community School. Specifically, the attendance factor on the daily edit check does not match the attendance factor on the monthly reimbursement 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 <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.</p>	<p><i>Please provide a completed daily edit check worksheet for the month of December 2021 for Bus Route #2 - Pinon Community School and Bus Route #4 - Pinon Community School, Additionally, please provide written assurance that daily edit checks will be conducted.</i></p>
7	<p>The site application in CNPWeb does not accurately reflect the program participation observed on-site. Specifically, Pinon Community School Board did not participate in At-Risk Afterschool Meals during the review period</p>	<p>Advised SFA to update site application in CNPWeb and contact their assigned specialist to let them know of the changes.</p> <p><i>Please submit a new site application in CNPWeb that accurately reflects program participation in At-Risk Afterschool Meals. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i></p>	

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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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Not Applicable

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

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No Findings

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**Resource Management**

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| 8 | The Financial Management System utilized was insufficient to accurately identify and track all revenues and expenditures of the nonprofit school food service program.   | Discussed feasibility for designating a separate financial account for the nonprofit school food service, as well as the requirement to differentiate revenues and expenditures of the nonprofit school food service program if a separate account cannot be designated. Discussed the importance of establishing a financial management system and internal controls needed to accurately track all revenues and expenditures of the nonprofit school food service program. | <i>Please provide a written description of steps that will be taken to ensure all revenues and expenditures of the nonprofit school food service account are easily identifiable as required in 7 CFR 210.14.</i>  |
| 9 | Sufficient documentation could not be provided to support the reimbursement of Emergency Operational Costs to the nonprofit school food service account. Federal awards must be adequately documented as required in 2 CFR 200.403(g). | Discussed requirements for federal awards and that all costs charged to a federal award must be adequately documented. Referred to 2 CFR 200.403(g).   | <i>Please provide written procedures that will be implemented to ensure all federal awards intended for the reimbursement to the nonprofit school foodservice account and any necessary supporting documentation are adequately documented and kept on file.</i> |

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**General Program Compliance: Civil Rights**

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| 10 | The USDA nondiscrimination statement was not printed on appropriate program materials, specifically the medical statement for accommodating special dietary needs. | Discussed where to find nondiscrimination statement on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> 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 have been updated with the proper language.</i> |
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**General Program Compliance: SFA On-Site Monitoring**

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| 11 | On-site reviews of the lunch meal counting and claiming procedures for all sites within the SFA are not being conducted each year prior to February 1. | Discussed requirement and where to find a template Internal On-Site Monitoring Form-Lunch of the Meal Counting and Claiming System 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 Operational tab. Discussed who would be responsible for completing this each year. | <i>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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12 On-site reviews of the breakfast meal counting and claiming procedures for 50% of the sites within the SFA are not being conducted each year prior to February 1.	Discussed requirement and where to find a template Internal On-Site Monitoring Form-Lunch of the Meal Counting and Claiming System 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 Operational tab. Discussed who would be responsible for completing this each year.	<i>Please provide a written description of the process that has been put in place to ensure that 50% of the sites operating breakfast will 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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No Findings

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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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13 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: Dole - Mandarin Orange Fruit Cup (China). Additionally, documentation justifying a Buy American exception was not correctly maintained.	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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational tab. Buy American Recorded Webinar and FAQ 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 written description of the changes that have been made to procurement and recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i>
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14	Storage violations were observed: Items in the walk-in freezer were not elevated at least 6 inches from the floor.	Discussed specific violations and feasible solutions. Referred to Arizona's School Food Safety Guidance 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 Food/Health Safety tab. Additionally, discussed Food Safety Online Courses can be found on ICN's website at <a href="https://theicn.org/icn-resources-a-z/food-safety/">https://theicn.org/icn-resources-a-z/food-safety/</a> .	<i>Please provide a written description of the changes that have been made to correct the storage violations found.</i>
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**General Program Compliance: Reporting & Recordkeeping**

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

No Findings

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

Not Applicable

**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:**

Thank you for your cooperation and completion of the NSLP Administrative Review. We commend the district in all of the efforts displayed to ensure safe and healthy meals reach the students that represent Pinon Community School. If you have any questions or concerns related to the program and its requirements, please reach out to your program specialist.

**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      | \$0 |
| <input checked="" type="checkbox"/> No- NSLP     | <input type="checkbox"/> Yes- NSLP     | \$0 |
| <input checked="" type="checkbox"/> No- SSO SBP  | <input type="checkbox"/> Yes- SSO SBP  | \$0 |
| <input checked="" type="checkbox"/> No- SSO NSLP | <input type="checkbox"/> Yes- SSO NSLP | \$0 |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by January 21, 2022 to [Brandon.Estrada@azed.gov](mailto:Brandon.Estrada@azed.gov)



12/21/2021

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Reviewer Signature

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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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