



Arizona Department of Education Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Tempe Union High School District

CTD: 07-05-13

Site(s): Marcos De Niza High School and McClintock High School

Contacts: Kevin Mendivil, Superintendent and Julie Peterson, Director

Review Date: January 18-19, 2022

Review Period: December 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

1	McClintock High School: Meal count totals for the month of review were not correctly combined and recorded. This was deemed a non-systemic error and contributed 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 count totals are correctly combined and recorded.</i>
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Performance Standard 2: Meal Components & Quantities - Critical Area

2	Marcos De Niza High School: Fluid milk was not available in at least two varieties at the start of breakfast meal service. Specifically, a total of five students did not have a variety of milk to select from.	Discussed variety requirement and feasible options for compliance. Allowable milk varieties are fat-free unflavored, fat-free flavored and 1% unflavored. Fat free flavored milk was added to the breakfast meal service line on the day of review. Please note that repeated violations involving milk requirements may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).	<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>
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Performance Standard 2: Dietary Specifications & Nutrient Analysis - Critical Area

No findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

Not applicable.

Meal Access & Reimbursement: Verification

Not applicable.

Meal Access & Reimbursement: Meal Counting & Claiming

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| 3 | McClintock High School: Daily edit checks are not being conducted appropriately. Specifically, eligibility is split by category (free, reduced and paid), however, meal totals are entered in bulk as free eligibility. | Discussed daily edit checks needs to show all students as free with bulk/tallies OR meal counts need to be split up by eligibility category (free, reduced and paid) to match daily edit check eligibility categories (free, reduced and paid). | <i>Please provide a completed daily edit check worksheet for the month of January 2022. Additionally, please provide written assurance that daily edit checks will be conducted appropriately.</i> |
| 4 | Marcos De Niza High School and McClintock High School: 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 find the most current daily edit check. The Step-by-Step Instruction: How to Complete Daily Edit Checks 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 completed daily edit check worksheet for the month of January 2022. Additionally, please provide written assurance that daily edit checks will be conducted appropriately.</i> |

Meal Pattern & Nutritional Quality: Offer Versus Serve

No findings.

Meal Pattern & Nutritional Quality: Meal Components & Quantities

No findings.

Resource Management

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| 5 | Due to increased food cost and universal free meals the Revenue Ratio (proportion of total revenue from the sale of nonprogram foods to the total revenue of the school food service account) was not equal to or greater than the Food Cost Ratio (proportion of total food costs associated with obtaining nonprogram foods to the total costs associated with obtaining program and nonprogram foods from the account). | Discussed revenue from nonprogram food requirements and provided with Nonprogram Food Revenue Tool. Referred to FNS Instruction 782-5 REV. 1 for more information about pricing for nonprogram adult meals. Discussed best practices for pricing nonprogram foods and ways to increase revenue from the sale of nonprogram food. | <i>Please indicate how it will ensured that the Revenue Ratio will be equal to or greater than the Food Cost Ratio. The explanation could include raising nonprogram food prices to sufficiently cover the cost of obtaining nonprogram foods. Alternatively, the SFA could provide non-Federal funds in the amount of the revenue shortfall to the nonprofit school food service account.</i> |
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General Program Compliance: Civil Rights

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| 6 | The USDA nondiscrimination statement was not printed on breakfast outreach material. | 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>An updated breakfast outreach material with the correct nondiscrimination statement has already been provided. No further corrective action is required.</i> |
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| 7 | Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, complaints are handled internally. | Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which 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 a complaint from being accepted. Additionally, 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. Additional 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. | <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> |
| 8 | Civil Rights training provided to staff did not cover all required training subjects. | Discussed the following subjects must be covered: Collection and Use of Data, Effective Public Notification Systems, Complaint Procedures, Compliance Review Techniques, Resolution of Noncompliance, Requirements for Reasonable Accommodations of Persons with Disabilities, Requirements for Language Assistance, Conflict Resolution, and Customer Service. An acceptable civil rights power point training material 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 all food service staff will be trained at hire and as needed on Civil Rights Compliance in Child Nutrition Programs. Describe the process that will be implemented to ensure that this requirement is adhered to and properly documented.</i> |
| 9 | The USDA nondiscrimination statement used on the breakfast and lunch menu is not the most current USDA statement. | 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 breakfast and lunch menu with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i> |

General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

10 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/nslp/training under the Online Training Tab.	<i>None required at this time.</i>
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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

11 The written food safety plan did not include adequate SOP and Critical Control Points for keeping food at safe temperatures.	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 a written food safety plan.</i>
12 Marcos De Niza High School: The most recent food safety inspection report was not posted in a prominent location and was not visible to all program participants.	Discussed making copies of most recent report and feasible places for posting.	<i>The most recent food safety inspection report was moved to a prominent location and was visible to all program participants during meal service. No further corrective action is required.</i>

<p>13 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools or at off-site storage facilities: banana (Ecuador), canned black olives (Morocco), canned jalapeno (Mexico), canned broccoli (Mexico), tomatoes (Mexico) and cucumber (Mexico) violations. Additionally, documentation justifying a Buy American exception was not maintained/on file.</p>	<p>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.</p>	<p><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></p>
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General Program Compliance: Reporting & Recordkeeping

No findings.

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

<p>14 Sufficient outreach to families regarding the availability of the School Breakfast Program (SBP) was not conducted at the beginning of or during the school year. Specifically, the serving times and locations where breakfast is available are not communicated to families.</p>	<p>Discussed methods of notifying families of the availability of the SBP at the start of and throughout the school year. Additionally, discussed SBP reminders must include: serving times, locations where breakfast is available, and SBP costs.</p>	<p><i>An updated SBP outreach material with serving times and locations where breakfast is available has already been provided. No further corrective action is required.</i></p>
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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:

Congratulations! Tempe Union High School District has completed the Administrative Review in the 2021-2022 SY. Thank you for all of your hard work and organization throughout the AR process. It was a pleasure working with you. Thank you for working so diligently to assure that your students are receiving nutritious meals. I appreciate your enthusiasm and willingness to learn. Please let me know if you have any questions.□

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 | \$4.32 |
| <input type="checkbox"/> No- SSO SBP | <input type="checkbox"/> Yes- SSO SBP | Not applicable. |
| <input type="checkbox"/> No- SSO NSLP | <input type="checkbox"/> Yes- SSO NSLP | Not applicable. |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by February 14, 2022 to Jennifer McDonald at Jennifer.McDonald@azed.gov



1/24/2022

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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