



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

Administrative Review Summary Report

School Food Authority Name: Williams Unified District

CTD: 03-02-02

Site(s): Williams Elementary/Middle School

Contacts: Eric Evans, Superintendent ; Sandra Angat, WEMS Food Service Director

Review Date: December 16, 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

1	<p>During breakfast on the day of observation, all required meal components were not available on 67 meals. This occurred due to a shortage of 4oz fruit juice cups during service. As a result of the shortage, remaining meals counted toward reimbursement consisted of 1/4 cup fruit which does not meet the minimum requirement of 1/2 cup fruit/vegetable for OVS. Investigations into how this finding occurred determined that the SFA experienced supply chain issues with their vendor on recent purchase orders with select products, including fruit juice items. Per COVID-19 Child Nutrition Response #100, fiscal action will not be accessed due to missing food components.</p>	<p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. Discussed with cafeteria staff 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 Meal at the Point of Service and/or 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 breakfast meal counting and claiming procedures to ensure that all meals counted for reimbursement contain all of the required meal components.</i></p>
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| 2 | <p>During lunch on the day of observation, the Chicken Chimichanga and Ham Sandwich could not be credited towards the meal pattern due to insufficient documentation. Without sufficient documentation, the reviewer was unable to determine if the M/MA and grain quantity requirements were met. This was determined to be a repeat finding from previous cycle and contributed towards fiscal action calculations</p> | <p>Discussed requirements regarding processed product documentation and provided examples. USDA Food Fact Sheets can be found on USDA's website at http://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets/. The CN Labels and Product Formulation Statements 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 a Child Nutrition (CN) label and/or Product Formulation Statement (PFS) and a recipe for Chicken Chimichanga and ham sandwich. If unable to provide a CN label, PFS or recipe, 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.</i></p> |
| 3 | <p>During the review period, breakfast meals served consisted of insufficient daily and weekly fruit quantities. This is not a repeat finding and 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., changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. 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 a written description of the changes that have been made to ensure that fruit quantities meet minimum amounts required by the SBP meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Breakfast Menu must be submitted.</i></p> |
| 4 | <p>During the review period, breakfast meals served consisted of insufficient daily and weekly grain quantities. This is not a repeat finding and 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., changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that grain quantities meet minimum amounts required by the SBP meal pattern.</i></p> |

5	During the review period, Lunch meals served consisted of insufficient daily and weekly fruit quantities. This was determined to be a repeat finding from previous cycle and contributed towards 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.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. 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.
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Please provide a written description of the changes that have been made to ensure that fruit quantities meet minimum amounts required by the NSLP meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.

6 During the review period, the Chicken Chimichanga, Ham Sandwich, and BBQ chicken entrees' could not be credited towards the NSLP meal pattern due to insufficient documentation. Without sufficient documentation, the reviewer was unable to determine if the M/MA and grain quantity requirements were met. This was determined to be a repeat finding from previous cycle and contributed towards fiscal action calculations.

Discussed requirements regarding processed product documentation and provided examples.

Please provide a Child Nutrition (CN) label and/or Product Formulation Statement (PFS) and a recipe for Chicken Chimichanga, ham sandwich and BBQ Chicken. If unable to provide a CN label, PFS or recipe, 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.

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

7 Daily edit checks are not being conducted appropriately. Specifically, daily edit checks for NSLP are not being conducted on a single site basis but are instead compiled into one worksheet. Additionally, the attendance factor in use does not match the attendance factor on the monthly reimbursement claims.

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/nslp/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/nslp/training> under the Online Training Library tab.

Please provide a completed NSLP daily edit check worksheet for Williams Elementary/Middle School for the month of January 2022. Additionally, please provide written assurance that daily edit checks will be conducted separately for each site in the district with the use of the attendance factor provided on monthly reimbursement claims.

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| 8 | The site application in CNPWeb does not accurately reflect the point of service that were observed on-site. Specifically, the district does not currently participate in Afterschool Snack. | 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 the point of service. 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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| 9 | During the day of observation, Offer versus Serve (OVS) was not implemented properly. Meals counted for reimbursement were missing required components, which include 1/2 cup fruit/vegetable. | 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/nsfp under the Guidance Manuals tab. | <i>Please provide a written description demonstrating how OVS will be implemented properly. Additionally, please provide written assurance that moving forward, OVS will be implemented properly.</i> |
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Meal Pattern & Nutritional Quality: Meal Components & Quantities

No Findings

Resource Management

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| 10 | Although the district is involved in the sale of a la carte items and adult meals, a system or process to sufficiently separate nonprogram food revenue and costs from program food revenue and costs has not been implemented. | Discussed requirement that all revenue from the sale of nonprogram foods must return to the non-profit school foodservice account if nonprogram foods were purchased through the non-profit school foodservice account as specified in 7 CFR 210.14(f). | <i>Please provide a description of the systems that will be developed to separate nonprogram food revenue from program food revenue and assurance that those systems will be implemented.</i> |
| 11 | Sufficient documentation to support compliance in maintenance of the nonprofit food service account (NPFSA) has not been maintained. Specifically, a detailed general ledger and The Annual Financial Report for SY21 were not made available during the review period. | Discussed requirements for maintenance of the nonprofit food service account, reminded them of keeping documents such as a detailed general ledger and annual financial report on file. | <i>Please provide written assurance that all documents pertaining to the NPFSA will be retained on file for at least 5 years, as is required by Arizona law, as well as a written plan for ensuring that this requirement is met.</i> |

12 Sufficient documentation of funds used to reimburse local sources of funds used to supplement the nonprofit school food service account to offset the impact of pandemic operations was not maintained.	Program operators using emergency operational costs funds to reimburse any local source of funds used to supplement the nonprofit school food service account during the reimbursement period to offset the impact of pandemic operations on that account must maintain documentation supporting these reimbursements for future audit or oversight purposes. Referred to SP 06-2021a: Q&A for Program Reimbursement for Emergency Operational Costs for Child Nutrition Programs during the COVID-19 Pandemic located on ADE's website at https://www.azed.gov/hns/memos .	<i>Please provide written procedures that will be implemented to ensure any reimbursements of local sources of funds used to supplement the nonprofit school food service account are adequately documented and kept on file.</i>
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General Program Compliance: Civil Rights

13 The USDA nondiscrimination statement used on the notification of benefits letter 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 program material with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i>
14 The USDA nondiscrimination statement was not printed on the Local Wellness Policy.	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 local wellness policy 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

15 An internal review 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 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 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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16 An internal review of the breakfast 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-Breakfast of the Meal Counting and Claiming System found 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 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

17 The SFA did not opt into the Nationwide Waiver of Local School Wellness Policy Triennial Assessments in the National School Lunch and School Breakfast Programs.	Discussed updating the NSLP Sponsor application to indicate participating in the Nationwide Waiver of Local School Wellness Policy Triennial Assessments in the National School Lunch and School Breakfast Programs. Referred to HNS 13-2021 Applications for School Food Authorities Serving Meals During School Year 2021-2022.	<i>Please submit an updated NSLP Sponsor application indicating participation in the of Local School Wellness Policy Triennial Assessments in the National School Lunch and School Breakfast Programs. Additionally, provide written assurance that you follow-up with your assigned HNS Specialist.</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

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| 18 | The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: Fresh Cucumber (Mexico) Canned Mandarin Oranges (China) . Additionally, documentation justifying a Buy American exception was not 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 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 recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i> |
| 19 | 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>Please provide a photo demonstrating that the most recent food safety inspection report has been posted in a location where the program participants can view it. Additionally, please specify where the report has been posted.</i> |

General Program Compliance: Reporting & Recordkeeping

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| 20 | Production records for lunch provided did not contain all required sections: Specifically, production records used/left over section is not completed adequately. | Discussed required sections of production records. Production Record Templates can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab. 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 copies of completed lunch production records for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years. Additionally, the certificate of completion of Production Record Overview must be provided.</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 participation in the NSLP Administrative Review! It was a pleasure to meet program staff and participants during observations. I recommend taking time to strategize how program staff will be trained on recordkeeping requirements. I also recommend program staff be refreshed on requirements for offer versus serve meal service operations.

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 | \$0.00 |
| <input type="checkbox"/> No- NSLP | <input checked="" type="checkbox"/> Yes- NSLP | \$3,518.77 |
| <input checked="" type="checkbox"/> No- SSO SBP | <input type="checkbox"/> Yes- SSO SBP | \$0.00 |
| <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 February 18, 2022 to Brandon.Estrada@azed.gov



1/24/2022

Reviewer Signature

Date



1/24/2022

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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