



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

Administrative Review Summary Report

School Food Authority Name: Cochise Community Development Corporation

CTD: 02-87-01

Site(s): Berean Academy

Contacts: Sharie Banbury, Director of Food Services

Review Date: January 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
Performance Standard 1: Certification & Benefit Issuance - Critical Area			

Not applicable.

Performance Standard 1: Meal Counting & Claiming - Critical Area

1	Unallowable meal count methods were observed on the day of review at breakfast. Specifically, two classrooms were observed recording a total number rather than taking individual meal counts at the point of service. 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 (e.g., following up on suspicious meal count patterns, monitoring classrooms, etc.).	<i>Please provide a written description of changes to the system that have been implemented to ensure that individual meal counts are taken at the point of service during breakfast in the classroom.</i>
2	Breakfast count totals for the day of review were not correctly combined and recorded. Specifically, a classroom was counted twice while consolidating the breakfast tallies. This was deemed a non-systemic error. The SFA revised the counts and therefore this 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., having multiple people confirm the count, using a spreadsheet that calculates the sum, etc.).	<i>Please provide a written description of changes to the system that have been implemented to ensure that breakfast in the classroom tallies are correctly combined and recorded.</i>

3	Breakfast count totals for the month of review were not correctly combined and recorded on the claim for reimbursement. Specifically, 272 breakfasts were recorded on December 1, 2021 when breakfast in the classroom tallies supported 266 breakfasts were served resulting in an overclaim of 6 breakfasts. 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 (e.g., having multiple people confirm the count, using a spreadsheet that calculates the sum, etc.).	<i>Please provide a written description of changes to the system that have been implemented to ensure that breakfast counts are correctly combined and recorded.</i>
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Performance Standard 2: Meal Components & Quantities - Critical Area

4	Quantities observed on the day of review did not meet minimum amounts required by the meal pattern. Specifically, the hot dog bun served to grades 9-12 credited as 1.0 oz eq grain when a minimum of 2.0 oz eq grain is required daily for grades 9-12. This was determined to be a repeat finding from previous cycle.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., procuring a different bun, addition of a grain item, 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 minimum daily grain quantities meet minimum amounts required by the meal pattern for grades 9-12. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.</i>
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5	The meal service was not structured to comply with the meal pattern requirements of the multiple grade groups that were served. Although grades 9-12 are served lunch separately, meal service is not structured to comply with increased quantities requirements.	Discussed allowable meal pattern grade groups per the grades served and feasible options for structuring the meal service to comply with quantity requirements (e.g., increasing portions or adding additional items prior to 9-12 meal service, etc.). 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 implemented to ensure that meal pattern requirements of the multiple grade groups served are met.</i>
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<p>Quantities observed during the week of review did not meet minimum amounts required by the meal pattern. Specifically, weekly meat/meat alternate quantities were not met for grades K-8. This was determined to be a repeat finding from previous review cycle and 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., increasing meat/meat alternate offerings, increasing portion sizes, 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).</p>	<p><i>Please provide a written description of the changes that have been made to ensure that minimum weekly meat/meat alternate quantities meet minimum amounts required by the meal pattern for grades K-8.</i></p>
<p>6</p>		
<p>Quantities observed during the week of review did not meet minimum amounts required by the meal pattern. Specifically, daily meat/meat alternate quantities were not met for grades 9-12 on 12/7/21. This was determined to be a repeat finding from previous review cycle and 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., increasing meat/meat alternate offerings, increasing portion sizes, 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).</p>	<p><i>Please provide a written description of the changes that have been made to ensure that minimum daily meat/meat alternate quantities meet minimum amounts required by the meal pattern for grades 9-12.</i></p>
<p>7</p>		

8	<p>Quantities observed during the week of review did not meet minimum amounts required by the meal pattern. Specifically, weekly meat/meat alternate quantities were not met for grades 9-12. This was determined to be a repeat finding from previous review cycle and 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., increasing meat/meat alternate offerings, increasing portion sizes, 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).</p>	<p><i>Please provide a written description of the changes that have been made to ensure that minimum weekly meat/meat alternate quantities meet minimum amounts required by the meal pattern for grades 9-12.</i></p>
9	<p>Quantities observed during the week of review did not meet minimum amounts required by the meal pattern. Specifically, daily grain quantities were not met for grades 9-12 on 12/6/21, 12/7/21, and 12/8/21. Upon expanding the review to the entire month, 2 additional days (12/3/21 and 12/13/21) were found with insufficient daily grain quantities for grades 9-12. This was determined to be a repeat finding from previous review cycle and 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., increasing grain offerings, increasing portion sizes, 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).</p>	<p><i>Please provide a written description of the changes that have been made to ensure that minimum daily grain quantities meet minimum amounts required by the meal pattern for grades 9-12.</i></p>

<p>Quantities observed during the week of review did not meet minimum amounts required by the meal pattern. Specifically, weekly grain quantities were not met for grades 9-12. This was determined to be a repeat finding from previous review cycle and 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., increasing grain offerings, increasing portion sizes, 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).</p>	<p><i>Please provide a written description of the changes that have been made to ensure that minimum weekly grain quantities meet minimum amounts required by the meal pattern for grades 9-12.</i></p>
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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

<p>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.</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/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.</p>	<p><i>Please provide a completed daily edit check worksheet for the month of January. Additionally, please provide written assurance that daily edit checks will be conducted. 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

No findings.

Meal Pattern & Nutritional Quality: Meal Components & Quantities

No findings.

Resource Management

No findings.

General Program Compliance: Civil Rights

No findings.

General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

The Local Wellness Policy (LWP) did not contain policies for food and beverage marketing.

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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. *None required at this time.*

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

No findings.

General Program Compliance: Reporting & Recordkeeping

No findings.

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

No findings.

Other Federal Program Reviews: Afterschool Snack Program

No findings.

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! Cochise Community Development Corporation has completed the Administrative Review for the 2021-2022 school year. Thank you for your hospitality and organization during the review process. It is evident that you are working hard to ensure your students are fed healthy meals in a welcoming environment. It is recommended that meal counting, especially during Breakfast in the Classroom, is closely monitored for accuracy and menus are revised to ensure high school students are receiving adequate nutrition.

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 \$0.00
 No- NSLP Yes- NSLP \$1,030.74

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by March 14, 2022 to Kariann Sadlon at Kariann.Sadlon@azed.gov.



Reviewer Signature 2/17/2022
Date



Program Director Signature 2/17/2022
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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