



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

Administrative Review Summary Report

School Food Authority Name: Jeehdeez'a Elementary
CTD: 09-40-14
Site(s): Rat Springs/Shady Side Bus Route- Jeehdeez'a Elementary

Contacts: Vincent Mays, School Principal ; Anna Charlie, School Cook

Review Date: November 30, 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
-----	--------------------------------	-------------------------------	----------------------------

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

No Findings

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

- | | | | |
|---|---|---|--|
| 1 | The site application in CNPWeb does not accurately reflect the point of service or counting and claiming procedures that were observed on-site. Specifically, grab & go breakfast and Lunch in the Classroom are currently in operation. | 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 and counting and claiming procedures. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i> |
| 2 | The site application in CNPWeb does not accurately reflect the point of service or counting and claiming procedures that were observed on-site. Specifically, serving times for breakfast and lunch do not reflect the CNP Web SFSP site application. | 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 and counting and claiming procedures. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i> |

Meal Pattern & Nutritional Quality: Offer Versus Serve

- | | | | |
|---|---|--|---|
| 3 | Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast and lunch. | Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab. | <i>Please provide the sign that will be displayed to students that demonstrates what constitutes a reimbursable meal at breakfast and lunch. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i> |
|---|---|--|---|

Meal Pattern & Nutritional Quality: Meal Components & Quantities

No Findings

Resource Management

- | | | | |
|---|--|---|---|
| 4 | The Financial Management System utilized was insufficient to accurately identify and track all revenues and expenditures of the nonprofit school food service program. | Discussed 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> |
|---|--|---|---|

General Program Compliance: Civil Rights

- | | | | |
|---|--|---|---|
| 5 | The public/media release was not provided to local media, the unemployment office and local employers considering large layoffs. | Discussed schools operating SSO must provide public notification regarding the availability of school meals and the eligibility criteria at or near the beginning of the school year. For SY 2021-2022, schools participating in SSO should notify households that meals will be offered free through SSO. Referred to HNS 17-2021 & SP 15-2021 (Q10). Additionally, referred to the template release that can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Outreach tab. | <i>Please provide written procedures for distributing the public/media release and written assurance that the public/media release will be submitted to the local media, the unemployment office and local employers considering large layoffs prior to the start of each school year.</i> |
| 6 | The Civil Rights Compliance form is not being completed every year by December 15 and kept on file. | Discussed requirement for completing form and how to collect racial/ethnic data from program participants. The form can be found on ADE's website at https://www.azed.gov/hns/civilrights . The Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form 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 the Civil Rights Compliance form will be completed by December 15 each year and kept on file for 5 years. Additionally, please indicate who will be responsible for completing this form. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form must be submitted.</i> |

General Program Compliance: SFA On-Site Monitoring

- | | | | |
|---|---|---|--|
| 7 | 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 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> |
| 8 | 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 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 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> |

General Program Compliance: Local Wellness Policy

9 A Local Wellness Policy (LWP) has not been developed.	Discussed preliminary planning, such as who will be named as the designated LWP official and how required stakeholders will be invited to participate in the process. Reviewed handouts and discussed developing a LWP with required elements. Local Wellness Policy resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Local Wellness Policy tab. 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>Please provide a written plan for development of a Local Wellness Policy. This plan must include who will be designated as the oversight official, who will be invited to participate in the development process and the date by which the policy is expected to be completely developed and adopted. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.</i>
10 The Local Wellness Policy (LWP) did not contain goals for nutrition education.	Discussed developing a LWP with goals for nutrition education. Discussed nutrition education activity ideas which included integrating nutrition into health education classes, promoting skill development and integrating nutrition into core subjects.	<i>Please provide a written plan for how the missing elements of the LWP will be included. The plan should include draft language of the element(s) to be added, who will be involved in updating the LWP and the date the update is expected to be completed. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.</i>
11 The Local Wellness Policy (LWP) did not contain goals for physical activity.	Discussed developing a LWP with goals for physical activity. Made suggestions to include the number of days per week or minutes per day that students would receive physical activity in addition to physical assessments. b.	<i>Please provide a written plan for how the missing elements of the LWP will be included. The plan should include draft language of the element(s) to be added, who will be involved in updating the LWP and the date the update is expected to be completed. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.</i>
12 The Local Wellness Policy (LWP) did not contain goals for other school-based activities.	Discussed developing a LWP with goals for other school-based activities. Discussed other school-based activity ideas which included the HealthierUS School Challenge, offering staff wellness training to inspire them to serve as role models, sponsoring health fairs and incorporating school gardens and/or the Farm to School Program.	<i>Please provide a written plan for how the missing elements of the LWP will be included. The plan should include draft language of the element(s) to be added, who will be involved in updating the LWP and the date the update is expected to be completed. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.</i>

- | | | |
|--|--|---|
| 13 The Local Wellness Policy (LWP) did not contain nutrition guidelines for all foods and beverages sold to students on the school campus during the school day. | Discussed developing a LWP with nutrition guidelines for all foods and beverages sold to students that meet Federal regulations. | <i>Please provide a written description of the changes that will be made to the LWP to meet the requirements for nutrition guidelines for all food and beverages sold to students. The description should include draft language, who will be involved in updating the LWP and the date the update is expected to be completed.</i> |
| 14 The Local Wellness Policy (LWP) did not contain nutrition standards for all foods and beverages provided, but not sold, to students on the school campus during the school day. | Discussed developing a LWP with nutrition standards for all foods and beverages provided, but not sold, to students. | <i>Please provide a written plan for how the missing elements of the LWP will be included. The plan should include draft language of the element(s) to be added, who will be involved in updating the LWP and the date the update is expected to be completed. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.</i> |
| 15 The Local Wellness Policy (LWP) did not contain goals for nutrition promotion. | Discussed feasible options for nutrition promotion goals that can be written into the LWP. Discussed activity ideas which included offering contests, surveys, promotions and/or taste testing, providing information to families to encourage consumption of healthy foods at home, and displaying nutrition and health posters throughout campus. Team Nutrition Resources can be found at http://www.teamnutrition.usda.gov/ . | <i>Please provide a written description of the changes that will be made to the LWP to meet the requirements for goals for nutrition promotion. The description should include draft language, who will be involved in updating the LWP and the date the update is expected to be completed.</i> |
| 16 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. | <i>Please provide a written description of the changes that will be made to the LWP to meet the requirements for policies for food and beverage marketing. The description should include draft language, who will be involved in updating the LWP and the date the update is expected to be completed.</i> |
| 17 There is not a designated Local Wellness Policy (LWP) oversight official. | Discussed LWP requirements. 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/nspl/training under the Online Training Tab. | <i>Please provide a written plan for how the missing element of the LWP will be included. The plan should include draft language of the element to be added, who will be involved in updating the LWP and the date the update is expected to be completed. Additionally, provide written assurance that the LWP will be specific to your institution.</i> |
| 18 The public is not being notified of the existence and contents of the Local Wellness Policy (LWP). | Discussed feasible means of notifying the public about the LWP. | <i>None required at this time.</i> |

- | | | | |
|----|---|---|------------------------------------|
| 19 | The Local Wellness Policy (LWP) does not specify how and when a review and update of the policy is to occur. | Discussed the best setting and timeframe for the periodic review and update of the LWP as well as how this can be included in the LWP. | <i>None required at this time.</i> |
| 20 | Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the Local Wellness Policy (LWP). | Discussed feasible means of notifying potential stakeholders of their ability to participate. | <i>None required at this time.</i> |
| 21 | A recent assessment of the implementation of the Local Wellness Policy (LWP) has not been conducted nor have plans been developed to complete the assessment. | Discussed requirement to complete an assessment once every three years, at a minimum. The assessment must measure how the LEA is complying with their LWP, how the LEA's LWP compares to the model wellness policy, and progress made in attaining the goals of the wellness policy. Sample evaluation tools can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Local Wellness Policy tab. Local Wellness Policy Assessment: Making it Meaningful 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> |

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

- | | | | |
|----|---|---|---|
| 22 | Temperature logs for food storage areas are not being maintained. | Discussed requirements for maintaining food storage area temperature logs, sample templates, and who would be responsible. Temperature logs for food storage areas must be maintained for 6 months. Monitoring forms can be 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 a copy of the temperature log that will be used for food storage areas as well as written assurance that logs will be kept daily and maintained on-file for 6 months.</i> |
|----|---|---|---|

<p>23 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: Superior Foods Frozen Broccoli (CHI, ECU, GUAT, MEX) Jack Pot Canned Pineapple (THL, CHI, INDE) Additionally, documentation justifying a Buy American exception was not maintained.</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>
---	--	--

General Program Compliance: Reporting & Recordkeeping

<p>24 The Annual Financial Report was not submitted to ADE on time.</p>	<p>Discussed reporting requirements for Annual Financial Report and who would be responsible for submitting.</p>	<p><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></p>
---	--	--

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 Jeehdeez'a Elementary. 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?

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

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by January 31, 2022 to Brandon.Estrada@azed.gov

 12/27/2021

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.

Equity for all students to achieve their full potential
www.azed.gov – (602) 542-8700 – 1535 West Jefferson Street • Phoenix, Arizona 85007 Bin # 7
This institution is an equal opportunity provider