

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

## Administrative Review Summary Report

CTD: 08-87-58 Site(s): Mohave Accelerated Learning Center, Mohave Accelerated Elementary School East, Mohave Accelerated Elementary School

Contacts: Casey Mulligan, Sup Review Date: January 25-	· · · · · · · · · · · · · · · · · · ·	., 0.002.10, 1				
Review Period: December	r 2021					
Programs Reviewed:	✓ National School Lunch		✓ School Breakfast	✓ Afterschool Snack		
	Fresh Fruit & Veg	getable	Special Milk	At-Risk Afterschool Meals		
No. Review Observation	s & Findings	Technical A	Assistance Provided	Required Corrective Action		
Performance Standard 1: Certification & Benefit Issuance - Critical Area						
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Not Applicable	eriormance Stands					

#### Performance Standard 1: Meal Counting & Claiming - Critical Area

1 The meal count total for lunch for the review period at Mohave Accelerated Learning Center allowed for this to happen and (site) and Mohave Accelerated Elementary School East was not correctly transferred to the December claim for reimbursement. This was deemed a non-systemic error and contributed toward fiscal action calculations

School Food Authority Name: Mohave Accelerated Learning Center

Discussed how current system potential changes that could be made to ensure it doesn't continue.

Please provide a written description of changes to the system that have been implemented to ensure that meal counts are accurately consolidated and recorded on the claim for reimbursement.

### Performance Standard 2: Meal Components & Quantities - Critical Area

2 Quantities observed at Mohave Accelerated Elementary School and Mohave Accelerated Elementary School East during the review period did not meet minimum amounts required by the meal pattern. During breakfast, minimum weekly grain requirements were not met. This is not a repeat finding 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., 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. Meal pattern requirements for the National School Breakfast 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 Breakfast 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

Please provide a written description of the changes that have been made at Mohave Accelerated Elementary School and Mohave Accelerated Elementary School East to ensure that grain quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Breakfast Menu must be submitted.

(extra 7 cents).

3 Quantities observed during the review period did not meet minimum amounts required by the meal pattern due to insufficient documentation for Mohave Accelerated Elementary School and Mohave Accelerated Elementary School East: Specifically, lunch production records were not completed for Fruit. Without sufficient documentation, the reviewer was unable to determine if the quantity requirements were met. This is not a repeat finding and did not contribute toward fiscal action calculations. 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.

Please provide a written description of the changes that have been made to procedures for completing production records to ensure items served and portion sizes are accurately recorded.

4 Quantities observed during the review period did not meet minimum amounts required by the meal pattern due to insufficient documentation for Mohave Accelerated Elementary School and Mohave Accelerated Elementary School East: Specifically, lunch production records were not completed for Vegetables. Without sufficient documentation, the reviewer was unable to determine if the quantity requirements were met. This is not a repeat finding and did not contribute toward fiscal action calculations.

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.

Please provide a written description of the changes that have been made to procedures for completing production records to ensure items served and portion sizes are accurately recorded.

5 Quantities observed for Mohave Accelerated Elementary School and Mohave Accelerated Elementary School East during the review period did not meet minimum amounts required by the meal pattern. During lunch, minimum weekly grain requirements were not met. This is not a repeat finding 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., 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. 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-

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).

Please provide a written description of the changes that have been made at Mohave Accelerated Elementary School and Mohave Accelerated Elementary School East to ensure that grain quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.

Quantities observed for Mohave Accelerated Elementary School and Mohave Accelerated Elementary School East during the review period did not meet minimum amounts required by the meal pattern. During lunch, minimum weekly meat/meat alternate requirements were not met. This is not a repeat finding 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.

Please provide a written description of the changes that have been made at Mohave Accelerated Elementary School and Mohave Accelerated Elementary School East to ensure that meat/meat alternate quantities meet minimum amounts required by the meal pattern.

Quantities observed at Mohave Accelerated Learning Center (site) during the review period did not meet minimum amounts required by the meal pattern. Specifically During breakfast, to ensure it doesn't continue (e.g., minimum weekly and daily grain requirements were not met. This is not a repeat finding and did not contribute toward fiscal action calculations.

Discussed how current system allowed for this to happen and potential changes that could be made 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.

Please provide a written description of the changes that have been made at Mohave Accelerated Learning Center to ensure that grain quantities meet minimum amounts required by the meal pattern.

During the review period, the "Chicken Wraps" and "MALC Bowl" entrees offered at Mohave Accelerated Learning Center (site) could not be credited towards the Lunch meal pattern due to insufficient documentation. Without sufficient documentation, the reviewer was unable to determine if the meat/meat alternate quantity requirements were met. This is not a repeat finding and did not contribute toward fiscal action calculations.

Discussed how to credit meal with recipes, labels, and production records. Crediting resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab.

Please provide updated recipes and components and ensuring consistency accompanying Child Nutrition (CN) labels and/or Product Formulation Statements (PFS) for the Chicken Wraps and MALC Bowl offered at Mohave Accelerated Learning Center.

During the review period, the "Chicken Wraps" and "MALC Bowl" entrees offered at Mohave Accelerated Learning Center (site) could not be credited towards the Lunch meal pattern due to insufficient documentation. Without sufficient documentation, the reviewer was unable to determine if the grain quantity requirements were met. This is not a repeat finding and did not contribute toward fiscal action calculations.

Discussed how to credit meal with recipes, labels, and production records. Crediting resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab.

Please provide updated recipes and components and ensuring consistency accompanying Nutrition labels and/or Product Formulation Statements (PFS) for the Chicken Wraps and MALC Bowl offered at Mohave Accelerated Learning Center.

#### 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 10 The Free and Reduced-Price Policy Statement Referred them to FRPPS template on Please provide an updated and signed Free provided by the SFA does not reflect the ADE's website at website at and Reduced-Price Policy Statement. current staff employed by the food service https://www.azed.gov/hns/nslp/forms Additionally, please provide written department, specifically the food service under the Organizational tab. Advised assurance that moving forward, the Free and director Dobry Cieszko. SFA to work with their program Reduced Price-Policy Statement will reflect specialist to ensure necessry current practices. documents are updated and approved. Please submit a new SFSP site applications 11 The SFSP site application in CNPWeb does Discussed snack should not be not accurately reflect counting and claiming indicated on SFSP SY21/22 site for all sites in CNPWeb that accurately procedures that were observed on-site. applications and should be claimed reflects counting and claiming procedures.

## Meal Pattern & Nutritional Quality: Offer Versus Serve

them know of the changes.

under ASP. Advised SFA to update

12 Signage at Mohave Accelerated Learning Center (site) and Mohave Accelerated Elementary School East which explains what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable was not displayed to students at breakfast.

Specifically, all SFSP site applications indicate

however, snacks are currently claimed under

operating afternoon snack,

Discussed feasible options for creating and posting. Printable POS Signage can be found on ADE's website at https://www.azed.gov/hns/nslp/forms

Corrections were made on site at Mohave signage and potential content, plan for Accelerated Learning Center (site) and Mohave Accelerated Elementary School East. No further corretive action is required.

Additionally, please provide written

current practices in operation.

SFSP site application in CNPWeb and assurance that site and sponsor applications contact their assigned specialist to let in CNPWeb will accurately reflect the most

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

under the Menu Planning tab.

No Findings

ASP.

### **Resource Management**

13 Meals served to teachers, administrators, custodians, and other adults were not priced so that the adult payment was sufficient to cover the overall cost of the meal.

Referred to HNS 27-2021 Guidance for Adult Meal Pricing in School Year 2021-2022 (SY 22).

Please provide a written description of the steps that will be taken to determine adult meal prices and ensure adult payments are sufficient to conver the overall cost of the meal, including the exact formula used to price adult meals.

### **General Program Compliance: Civil Rights**

14 The USDA nondiscrimination statement was not printed on appropriate program materials, Specifically the Local Wellness Policy.

Discussed where to find website at

https://www.azed.gov/hns/civilrights and whether long or short statement would be most appropriate.

Please provide an updated Local Wellness nondiscrimination statement on ADE's Policy with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.

15 The "And Justice for All" poster displayed at Mohave Accelerated Learning Center (site) and Mohave Acelerated Elementary School was not the most updated poster from USDA. Discussed requirements of where poster must be placed and where to find a printable "And Justice For All" poster on ADE's website at https://www.azed.gov/hns/civilrights. Referred to HNS 08-2019 USDA Nondiscrimination And Justice for All Poster Clarification.

Please provide pictures to demonstrate the posters are now displayed in a prominent location and visible to all program participants at Mohave Accelerated Learning Center (site) and Mohave Acelerated Elementary School East. Additionally, please provide written assurance that the "And Justice For All" poster has been displayed in a prominent location and visible to all program participants.

#### General Program Compliance: SFA On-Site Monitoring

16 On-site reviews of the lunch meal counting and Discussed requirement and where to claiming procedures for all sites within the SFA find a template Internal On-Site are not being conducted each year prior to February 1.

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.

Please provide completed Internal On-Site Monitoring Forms of the Meal Counting and Claiming System. Additionally, 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.

17 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-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.

Please provide completed Internal On-Site Monitoring Forms of the Meal Counting and Claiming System. Additionally, 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.

## General Program Compliance: Local Wellness Policy

18 The review and update of the Local Wellness Discussed why the review and update None required at this time. Policy (LWP), as specified in the policy itself, is is not occurring and what can be done not occurring. Specifically, leadership indications are not reflective of current operations.

to ensure this occurs as specified in the LWP. Discussed maintaining records to document compliance. 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.

## **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

19 In regard to Mohave Accelerated Elementary School East, Mohave Accelerated Elementary School, and Mohave Accelerated Learning Center; the written food safety plans are not site specific and did not include meal service descriptions, adequate SOPs for hygiene, food https://www.azed.gov/hns/nslp/forms storage, food handling, food transporation or 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

under the Food/Health Safety tab.

Please provide a copy of the updated food safety plan for Mohave Accelerated Elementary School East, Mohave Accelerated Elementary School, and Mohave Accelerated Learning Center

20 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: Cucumber; Mexico, Cherry Tomatoes; Mexico, Banana; China. Additionally, documentation justifying a Buy American exception was not maintained.

Discussed the Buy American provision requirements and procedures to ensure compliance. 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

https://www.azed.gov/hns/nslp/training under the Online Training Library tab.

Please provide a written description of the changes that have been made to procurement and recordkeeping procedures Referred to SP38-2017, Buy American to ensure that the requirements of the Buy American Provision are met.

21 The most recent food safety inspection report was not posted in a prominent location and was not visible to all program participants at all posting. sites.

Discussed making copies of most recent report and feasible places for Please provide a photo from all sites 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.

#### General Program Compliance: Reporting & Recordkeeping

22 Production records maintined at all sites during Discussed required sections of the review period and day of review for breakfast and lunch did not contain all required Record Templates can be found on sections: grade group, milk type, portions size ADE's website at planned for each serving, list of every item that https://www.azed.gov/hns/nslp/forms is being served that day.

production records. Production 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.

Please provide copies of completed Breakfast and Lunch production records for 4 consecutive days for all sites that indicate complience in meal pattern requirements, 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.

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

No Findings

#### Other Federal Program Reviews: Afterschool Snack Program

- 23 The counting system employed at Mohave Accelerated Learning Center (Site) does not result in accurate snack counts. The reviewer could not validate counts. This contributed towards fiscal action calculations.
- Discussed ways to improve the counting system or alter it to ensure accurate counts are submitted in the claim for reimbursement.
- Please provide a written description of the system that will be implemented to ensure accurate snack counts are claimed for reimbursement.
- 24 The Afterschool Snack Program (ASP) monitoring review was not conducted within the requirements. A sample ASP first four weeks of operation and one additional time during the school year at all sites.
- Discussed ASP monitoring monitoring form can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational tab.
- Please provide written assurance that the ASP will be monitored once within the first four weeks of operation and one additional time at all sites during the school year, and that documentation to support this will be maintained.

- 25 Snack production records at Mohave Accelerated Learning Center (site), Mohave Accelerated Elementary School, and Mohave Accelerated Elementary School East are not being completed daily and maintained for 5 years, as is required.
- Discussed record keeping requirements of the ASP. A sample production record for the ASP can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab.

Please provide copies of completed Afterschool Snack Program (ASP) production records for all sites for 4 consecutive days. Additionally, please provide written assurance that all records will be maintained for 5 years.

## 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. It is clear that the program operates with inegrity and a passion to ensure children are happily fed a nutritious meal. My reccomendation following the review is to strategize how program staff will be trained on recordkeeping requirements such as meal counting, production records, and supporting documentation.

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 Assesse	d?	
☐ No- SBP	Yes- SBP	\$0.00
✓ No- NSLP	Yes- NSLP	\$308.00
☐ No- SSO S	SBP Yes- SSO SBP	N/A Simplified
☐ No- SSO I	NSLP Yes- SSO NSLP	N/A Simplified
Fiscal Action under \$6	600 will be disregarde	d.
Please submit correcti	ive action response b	y March 24, 2022 to Brandon.Estrada@azed.gov
B. 192		
Mar CO	2/24/2022	_
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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