



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

Administrative Review Summary Report

School Food Authority Name: Ray Unified District

CTD: 11-02-03

Site(s): Ray JR/SR High School

Contacts: Rochelle Pacheco, Chief Administrative Officer and Jodie McCroskey, Food Service Director

Review Date: February 16, 2022

Review Period: January 2022

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

No findings

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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| 1 | The Free and Reduced-Price Policy Statement provided by the SFA does not reflect current practices and procedures observed on-site. Specifically, the current authorized signer is no longer employed by Ray Unified District. | Referred them to FRPPS template on ADE's website at https://www.azed.gov/hns/nslp/forms under the Organizational tab. | <i>Please provide an updated and signed Free and Reduced-Price Policy Statement. Additionally, please provide written assurance that moving forward, the Free and Reduced Price-Policy Statement will reflect current practices.</i> |
| 2 | The SFSP site application in CNPWeb does not accurately reflect counting and claiming procedures that were observed on-site. Specifically, SFSP site application indicates operating am snack, however, snacks are not served in the am. Snacks are currently served afterschool and claimed under ASP. | Discussed snack should not be indicated on SFSP SY21/22 site applications and should be claimed under ASP. Advised SFA to update SFSP site application in CNPWeb and contact their assigned specialist to let them know of the changes. | <i>Please submit a new SFSP site application in CNPWeb that accurately reflects 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

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| 3 | Signage 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 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 has been displayed explaining what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i> |
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Meal Pattern & Nutritional Quality: Meal Components & Quantities

No findings

Resource Management

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| 4 | Meals served to teachers, administrators, custodians, and other adults were not priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or payroll funds, or funding from voluntary agencies) was sufficient to cover the overall cost of the meal. | Discussed ways to determine adult meal prices which included a per meal cost analysis or pricing adult meals to reflect the amount of reimbursement received for a free meal plus the per meal value of entitlement and bonus commodities for non-pricing programs. Referred to HNS 27-2021 Guidance for Adult Meal Pricing in School Year 2021-2022 (SY 22). | <i>Please provide a written description of the steps which have been taken to increase adult meal prices and resolve the discrepancy, including the exact formula used to price adult meals. Additionally, please submit supporting documentation which reflects that prices have been increased to the appropriate level.</i> |
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General Program Compliance: Civil Rights

<p>5 The most current "And Justice for All" poster was not displayed in a prominent location and was not visible to all program participants.</p>	<p>Discussed USDA revised the "And Justice for All" poster September 2019. Additionally, 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.</p>	<p><i>Please provide pictures to demonstrate the most current posters (revised September 2019) are now displayed in a prominent location and visible to all program participants. 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.</i></p>
<p>6 The USDA nondiscrimination statement used on the program menus is not the most current USDA statement.</p>	<p>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.</p>	<p><i>An updated program menu has already been provided. No further corrective action is required.</i></p>
<p>7 The USDA nondiscrimination statement was not printed on SFSP outreach program materials.</p>	<p>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.</p>	<p><i>Please provide an updated SFSP outreach program material with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i></p>
<p>8 The public/media release was not provided to local media, the unemployment office and local employers considering large layoffs.</p>	<p>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.</p>	<p><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></p>

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| <p>9 Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, complaints are handled internally.</p> | <p>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.</p> | <p><i>Please provide a written description of the updated process and procedures for processing complaints alleging discrimination which meets requirements.</i></p> |
| <p>10 Medical statement for students with special dietary accommodations does not contain required sections: Specifically, the form is missing a signature from a licensed professional; the form doesn't include list of substitution(s); and the form does not indicate if modification is temporary or permanent.</p> | <p>Discussed required sections of the medical statement for students with special dietary accommodations. Referred to Medical Statement for Students with Special Dietary Accommodations found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational tab. Step-by-Step Instruction: How to Complete the Medical Statement for Students with Special Dietary Accommodations 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 copy of the updated Special Dietary Needs Form that will be used for this purpose. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete the Medical Statement for Students with Special Dietary Accommodations must be submitted.</i></p> |

General Program Compliance: SFA On-Site Monitoring

No findings

General Program Compliance: Local Wellness Policy

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| 11 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> |
| 12 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. 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> |
| 13 The required stakeholders are not being permitted to be involved in the review and update of the Local Wellness Policy (LWP). | Discussed LEAs must permit participation by the general public and school community (including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators) in the wellness policy process. Guidance on assembling a Local Wellness Policy Team can be found on Team Nutrition's website at https://www.theicn.org/cnss/community-connection/assembling-the-team/ . 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> |

14 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. 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

Not applicable

General Program Compliance: Professional Standards

15 The School Nutrition Program Director hired after July 1, 2015 did not complete the required 8 hours of food safety training within 30 days of being hired or within 5 years prior to hire date.	Discussed requirement and feasibility for attending an available certification training within current school year. Food Safety Online Courses can be found on ICN's website at https://theicn.org/icn-resources-a-z/food-safety/ .	<i>Please provide the expected date that food safety certification training will be completed by the School Nutrition Program Director.</i>
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General Program Compliance: Water

No findings

General Program Compliance: Food Safety, Storage and Buy American

16 The written food safety plan did not include adequate SOPs and Critical Control Points for keeping food at safe temperatures.	Referred to School Food Service Safety Precautions found on Center for Ecoliteracy website at https://www.ecoliteracy.org/download/covid-19-emergency-meal-service-resources . Additionally, referred to Sample Summary HACCP Plan for Emergency Meal Service during the COVID-19 Outbreak found on the Lunch Assist website at https://www.lunchassist.org/covid-19 under the Meal Service tab.	<i>Please provide a copy of the SOPs and CCPs found in the written food safety plan.</i>
17 A copy of the written food safety plan was not made available each site.	Discussed that this should be easily available at each food preparation and food service site and that staff should be aware of its existence.	<i>Please provide written assurance that a copy of the written food safety plan has been made available at each site.</i>

General Program Compliance: Reporting & Recordkeeping

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| 18 | Production record crediting and product crediting are inconsistent. Specifically, 11 popcorn chicken credit as 1oz/eq grain, however, the production record indicates 2oz/eq grain. | Discussed how to credit meal components and ensuring consistency 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. | <i>Please provide an updated production record and popcorn chicken crediting documentation with consistent crediting.</i> |
| 19 | Production record crediting and product crediting are inconsistent. Specifically, 2 taquitos credit as 1oz/eq m/ma, however, the production record indicates 2oz/eq m/ma. | Discussed how to credit meal components and ensuring consistency 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. | <i>Please provide an updated production record and taquito crediting documentation with consistent crediting.</i> |
| 20 | Production record crediting and product crediting are inconsistent. Specifically, 3 taquitos credit as 1.5oz/eq m/ma, however, the production record indicates 2oz/eq m/ma. | Discussed how to credit meal components and ensuring consistency 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. | <i>Please provide an updated production record and taquito crediting documentation with consistent crediting.</i> |
| 21 | Production records for the day of review did not contain all required sections: Specifically, they did not indicate specific amounts of each milk type served. All milk types were included on 1 line item. | Discussed how to properly complete production records. 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 production records for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years.</i> |

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

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| 22 | Although monthly menus are posted on district website and copies are available on-site, 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 not communicated to families. | Discussed methods of notifying families of the availability of the SBP at the start of and throughout the school year and determined. Additionally, discussed SBP reminders must include: serving times, locations where breakfast is available, and SBP costs. | <i>Please provide documentation that demonstrates how households are notified of the availability of the SBP at the beginning of and during the school year. Additionally, please provide a written description of how households will be notified of the availability of the SBP at the beginning of and during the school year, and written assurance that this will occur.</i> |
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Other Federal Program Reviews: Afterschool Snack Program

23	Snack production records 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.	<i>Please provide copies of completed Afterschool Snack Program (ASP) production records for 5 consecutive days. Additionally, please provide written assurance that all records will be maintained for 5 years.</i>
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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! Ray Unified 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 | \$0 |
| <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 March 25, 2022 to Jennifer McDonald at Jennifer.McDonald@azed.gov.



Reviewer Signature

3/4/2022

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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