



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

**Administrative Review Summary Report**

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School Food Authority Name: Gilbert Unified District

CTD: 07-02-41

Site(s): Campo Verde High School, Mesquite Jr High School, Quartz Hill Elementary and Spectrum Elementary

Contacts: Shane McCord, Superintendent and Bonnie Betz, Assistant Superintendent

Review Date: March 28-31, 2022

Review Period: February 2022

Programs Reviewed:       National School Lunch                       School Breakfast                       Afterschool Snack  
    Fresh Fruit & Vegetable                       Special Milk                       At-Risk Afterschool Meals

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No.	Review Observations & Findings	Technical Assistance Provided	Required Corrective Action
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**Performance Standard 1: Certification & Benefit Issuance - Critical Area**

Not Applicable

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

No Findings

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

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1 Campo Verde High School: Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the boneless wing entrée credits as 1oz eq grain. This resulted in Thursday daily requirement of 2oz eq grain and weekly requirement of 10oz/eq grain not being met. This was determined to be a repeat finding attributed to supply chain disruptions and therefore did not contribute toward fiscal action calculations per USDA's COVID-19: Child Nutrition Response #100.	Referred to HNS 31-2021 Waiver Guidance for Operating the Summer Food Service Program during Unanticipated School Closures in School Year 2021-2022 and HNS 30-2021 Guidance on the Use of the School Year 2021-2022 Meal Pattern Waiver found on ADE's website at <a href="https://www.azed.gov/hns/memos">https://www.azed.gov/hns/memos</a> . Additionally, discussed HNS has released a webform for all Child Nutrition Program operators to report any food supply disruptions. Food supply disruptions are challenges in purchasing and receiving food or supplies through normal channels, unanticipated cancellation of food and supply contracts, lack of availability of certain foods or supplies, unexpected substitution of food products, and increased food and supply prices. Reporting Food Supply Disruptions webform can be found on ADE's website at <a href="https://www.azed.gov/hns/covid19">https://www.azed.gov/hns/covid19</a> under the Reporting Food Supply Disruptions accordion.	<i>Please provide the steps that will be taken to ensure documentation supporting supply chain disruptions is maintained. Additionally, provide written assurance that this documentation will be kept on file for a minimum of five years.</i>
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**Performance Standard 2: Dietary Specifications & Nutrient Analysis - Critical Area**

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No Findings

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**Meal Access & Reimbursement: Certification & Benefit Issuance**

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Not Applicable

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**Meal Access & Reimbursement: Verification**

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Not Applicable

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**Meal Access & Reimbursement: Meal Counting & Claiming**

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2 Campo Verde High School and Mesquite Jr High School: 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.	Discussed how to find the most current daily edit check. The Step-by-Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab.	<i>An updated completed daily edit check worksheet for Campo Verde High School and Mesquite Jr High School has already been provided. No further corrective action is required.</i>
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| 3 | 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 Gilbert Unified District. | Referred them to FRPPS template on ADE's website at website at <a href="https://www.azed.gov/hns/nsfp/forms">https://www.azed.gov/hns/nsfp/forms</a> 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> |
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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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No Findings

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

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| 4 | Campo Verde High School, Mesquite Jr High School, Quartz Hill Elementary and Spectrum Elementary: Although the sufficient quantity of vegetable was available, it did not seem widely known by students or staff that the hot vegetable could be requested regardless of entrée or serving line. Specifically, the ability to select a hot vegetable with a grab-n-go entrée was not widely known by students or staff. | Discussed strategies for making all vegetable offerings accessible to all students including: making all daily vegetable offerings available in all servings lines at sites with multiple serving lines; training staff on the ability to provide the hot vegetable with any entrée; increasing signage and communication to students regarding the ability to request a hot vegetable with any entrée; serving hot vegetables in a manner that would allow students with grab-n-go entrées to easily select them; and/or revising menus to provide sufficient vegetable quantities each day that are not intended for a specific entrée. | Please provide a written description of the changes that will be implemented to ensure that students and staff are aware of the ability to select the hot vegetable regardless of entrée selection. |
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**Resource Management**

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| 5 | Net cash resources available in the nonprofit school food service account exceed the three month expenditure limit and approval from the ADE was not obtained. | Discussed requirement that net cash resources must be limited to an amount that does not exceed 3 months average expenditures without prior approval from the ADE. Referred to 7 CFR 210.19. | <i>Please provide documentation reflecting that net cash resources are below the 3 month average expenditure limit or provide a detailed spending plan to ADE for approval to maintain a balance in excess of the net cash resource limit.</i> |
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| 6 | A plan for spending the \$227,248.30 emergency operational costs funds was not in place.   | Program operators receiving emergency funds must provide information on the planned and/or eventual use of the funds to either 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 or be used in accordance with normal program requirements. 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 <a href="https://www.azed.gov/hns/memos">https://www.azed.gov/hns/memos</a> . | <i>Please provide a written plan for spending the \$227,248.30 emergency operational costs funds.</i> |
| 7 | The nonprofit school foodservice account was not charged the full indirect cost rate. Sufficient documentation was not provided explaining how the difference will be handled with the nonprofit school food service account (loan or forgiveness/gift) agreement. | Discussed Gilbert Unified District was allowed 20.80% of the direct cost base of \$5,971,850. The total allowable indirect was \$1,242,144.80. The actual indirect costs in the amount of \$1,000,000 or 16.75% of the direct cost base were recovered. Additionally, discussed the remaining cannot be collected in the future unless an agreement exists.   | <i>Please provide the loan or forgiveness/gift agreement for the remaining \$242,144.80.</i>          |

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**General Program Compliance: Civil Rights**

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| 8 | The USDA nondiscrimination statement used on program menus and breakfast outreach material is not the most current USDA statement. | Discussed where to find nondiscrimination statement on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> and whether long or short statement would be most appropriate. | <i>Please provide an updated program menu and breakfast outreach material with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i>                       |
| 9 | The USDA nondiscrimination statement was not printed on the medical statement for students with special dietary accommodations.    | Discussed where to find nondiscrimination statement on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> and whether long or short statement would be most appropriate. | <i>Please provide an updated medical statement for students with special dietary accommodations with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i> |

10 Civil Rights training provided to staff did not cover all required training subjects. Specifically, staff was only trained on Complaint Procedures.	Discussed the following subjects must be covered: Collection and Use of Data, Effective Public Notification Systems, Complaint Procedures, Compliance Review Techniques, Resolution of Noncompliance, Requirements for Reasonable Accommodations of Persons with Disabilities, Requirements for Language Assistance, Conflict Resolution, and Customer Service. An acceptable civil rights power point training material can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab.	<i>Please provide written assurance that all food service staff will be trained at hire and as needed on Civil Rights Compliance in Child Nutrition Programs. Describe the process that will be implemented to ensure that this requirement is adhered to and properly documented.</i>
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**General Program Compliance: SFA On-Site Monitoring**

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No Findings

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**General Program Compliance: Local Wellness Policy**

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No Findings

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**General Program Compliance: Competitive Food Services**

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No Findings

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**General Program Compliance: Professional Standards**

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No Findings

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**General Program Compliance: Water**

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No Findings

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**General Program Compliance: Food Safety, Storage and Buy American**

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11 The written food safety plan did not include adequate Critical Control Points (Process 1, 2 and 3) 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Food/Health Safety tab.	<i>Please provide written assurance that the food safety plan will be updated. Additionally, provide the expected completion date.</i>
12 Quartz Hill Elementary: 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>The most recent food safety inspection report was posted in a prominent location during the on-site visit. No further corrective action is required.</i>

<p>13 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: Vista Verde Jalapenos (Mexico), Broccoli (Mexico) and Suncup Juice violations. Additionally, documentation justifying a Buy American exception was not maintained/on file.</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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational tab. Buy American Recorded Webinar and FAQ can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab.</p>	<p><i>Please provide a written description of the changes that have been made to procurement and/or recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i></p>
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**General Program Compliance: Reporting & Recordkeeping**

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<p>14 Campo High School: Boneless Wings recipe crediting is not accurate due to product substitutions.</p>	<p>Discussed updating crediting information when substitutions are made.</p>	<p><i>An updated recipe for Boneless Wings has already been provided. No further corrective action is required.</i></p>
<p>15 Mesquite Junior High: Ham and Cheese Sub crediting is not accurately reflected on the recipe. Specifically, it credits as 2.25 oz eq M/MA while the recipe states it credits as 2.5 oz eq M/MA</p>	<p>Discussed updating the recipe.</p>	<p><i>An updated recipe for Ham and Cheese Sub has already been provided. No further corrective action is required.</i></p>
<p>16 Mesquite Junior High: Sausage Breakfast Bagel crediting is not accurately reflected on the production record. Specifically, it credits as 1.0 oz eq M/MA and 1.75 oz eq grain while the production record states it credits as 1.0 oz eq M/MA and 2.0 oz eq grain.</p>	<p>Discussed updating the recipe.</p>	<p><i>An updated recipe for Sausage Breakfast Bagel has already been provided. No further corrective action is required.</i></p>
<p>17 Campo High School and Mesquite Junior High: Breakfast Burrito recipe is not accurate. Specifically, the ingredients list is not consistent with the directions and total servings.</p>	<p>Discussed updating the recipe.</p>	<p><i>An updated recipe for Breakfast Burrito has already been provided. No further corrective action is required.</i></p>
<p>18 Mesquite Junior High: Side Salad recipe is not accurate. Specifically, the recipe calls for 1 cup iceberg lettuce, however, 1 cup romaine lettuce is used.</p>	<p>Discussed updating the recipe.</p>	<p><i>Please provide an updated recipe for Side Salad.</i></p>

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

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No Findings

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**Other Federal Program Reviews: Afterschool Snack Program**

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Not Applicable

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**Other Federal Program Reviews: Seamless Summer Option**

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Will be reviewed in Summer 2022 if applicable.

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**Other Federal Program Reviews: Fresh Fruit & Vegetable Program**

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Not Applicable

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**Other Federal Program Reviews: Special Milk Program**

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Not Applicable

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**Other Federal Program Reviews: At-Risk Afterschool Meals**

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Not Applicable

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Comments/Recommendations:

Congratulations! Gilbert 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.**

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  | N/A- Simplified |
| <input type="checkbox"/> No- SSO NSLP        | <input type="checkbox"/> Yes- SSO NSLP | N/A- Simplified |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by May 16, 2022 to Jennifer McDonald at [Jennifer.McDonald@azed.gov](mailto:Jennifer.McDonald@azed.gov).



4/11/2022

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

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