



## Arizona Department of Education Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: The Boys & Girls Clubs of the Valley

CTD: 07-86-13

Site(s): Mesa Arts Academy

Contacts: Miranda Koperno, Principal and Joyce Oyer, Assistant Principal

Review Date: March 16, 2022

Review Period: February 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**

1	<p>On the day of review, the required meal components were not available to all students during the breakfast meal service. Specifically, breakfast meal service ended 20 minutes early due to running out of peaches, cheese cube and nutrigrain bar. A substitute teacher changed the "normal" breakfast protocol (students get breakfast prior to going to class). After class began, he provided breakfast passes to all students. This allowed additional students to leave class and get a breakfast.</p>	<p>Discussed options for additional items to be offered as part of the reimbursable meal. Additionally, discussed training all substitute staff on breakfast protocol.</p>	<p><i>Please provide a written description of the changes that have been made to ensure that all required meal components are available to all students.</i></p>
2	<p>Fluid milk was not available in at least two varieties at breakfast on the day of review. Specifically, the caterer plans for 2 milk varieties on the production records, however, staff only provides 1% unflavored milk for breakfast.</p>	<p>Discussed variety requirement and feasible options for compliance. Allowable milk varieties are fat-free unflavored, fat-free flavored and 1% unflavored. Please note that repeated violations involving milk requirements may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p>	<p><i>Please provide one week of breakfast production records that demonstrate that fluid milk was available in at least two varieties. Additionally, please provide written assurance that fluid milk will always be available in at least two varieties at breakfast.</i></p>

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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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| 3 | The site application in CNPWeb does not accurately reflect the point of service procedures that were observed on-site. Specifically, NSLP site application indicates OVS for breakfast, however, Serve Only is implemented.                            | 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 procedures. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i>                           |
| 4 | 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 The Boys & Girls Clubs of the Valley.         | Referred them to FRPPS template on ADE's website at website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/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 an updated and signed Free and Reduced-Price Policy Statement will be provided to your Assigned HNS Specialist.</i>   |
| 5 | The site application in CNPWeb does not accurately reflect the point of service and counting and claiming procedures that were observed on-site. Specifically, the SFSP site application indicates open site, however, this is a closed enrolled site. | 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> |

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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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Not Applicable.

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

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| 6 | Signage which explains what constitutes a reimbursable meal was not displayed to students at lunch. Specifically, OVS lunch signage was displayed, however, Serve Only is implemented, | Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage 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 Menu Planning tab. | <i>Acceptable lunch signage which explains what constitutes a reimbursable meal has already been displayed to students. No further corrective action is required.</i> |
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**Resource Management**

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| 7 | Unallowable costs were paid for by the nonprofit school food service account. Specifically, Little Caesar's Pizza (\$10.84) was purchased with nonprofit school food service account funds and was served as the reimbursable meal. | Discussed Little Caesar's Pizza does not meet meal pattern requirements and is an unallowable meal pattern substitution. Additionally, discussed allowable meal pattern substitutions.  | <i>Please provide a copy of procedures for determining the allowability of costs as required by 2 CFR 200.303(b)(7). Please also provide written assurance that all expenses of the nonprofit school food service account will be limited to those costs which are necessary, reasonable, allocable; and also that these costs are in accordance with 2 CFR 200 Subpart E Cost Principles. Additionally, please provide supporting documentation which reflects that the total amount of unallowable costs \$10.84 was reimbursed to the nonprofit school food service account.</i> |
| 8 | A plan for spending the \$4,559.34 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 \$4,559.34 emergency operational costs funds.</i>   |

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**General Program Compliance: Civil Rights**

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| 9 | 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> 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> |
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**General Program Compliance: SFA On-Site Monitoring**

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Not Applicable

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**General Program Compliance: Local Wellness Policy**

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| 10 | The required stakeholders (students and board members) 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 <a href="https://www.theicn.org/cnss/community-connection/assembling-the-team/">https://www.theicn.org/cnss/community-connection/assembling-the-team/</a> . The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar 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 Tab. | <i>None required at this time.</i> |
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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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| 11 | The School Nutrition Program Director hired after July 1, 2015 did not meet the hiring standard requirement. | Discussed USDA has given State agencies the flexibility to approve a candidate that meets the educational standards but has less than the required years of relevant food service experience required for the Professional Standards Director Hiring Requirements. This flexibility may only be requested by, and approved for, Local Educational Agencies (LEAs) with an October enrollment of fewer than 500 students. | <i>Please provide the Approval Letter for Hiring Flexibility. Additionally provide written assurance that this documentation will be retained on file.</i> |
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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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| 12 | Although a copy of the written food safety plan was on site, it was stored in the front office and was not easily accessible during meal preparation and service.   | Discussed that the written food safety plan 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 in the meal service area.</i>  |
| 13 | The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: Suncup Juice. Additionally, documentation justifying a Buy American exception was not maintained/on file. | 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. | <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> |

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**General Program Compliance: Reporting & Recordkeeping**

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| 14 | Production records do not accurately reflect what is being served. Specifically, production records indicate fat free milk and low fat milk. Production records do not indicate if milk is flavored or unflavored. | Discussed production records should accurately reflect what is being served. Specifically, production records should indicate the fat content and flavored or unflavored. | <i>Please provide copies of completed breakfast and lunch production records for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years.</i>                  |
| 15 | Breakfast production records indicate fat free milk and low fat milk are served, however, only low fat unflavored milk is served.  | Discussed production records should accurately reflect what is being served.  | <i>Please provide copies of completed breakfast production records for 5 consecutive days. Additionally, provide written assurance production records will accurately reflect what is being served.</i> |

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| <p>16 The School Nutrition Program Director hired July 1, 2018 did complete the required 8 hours of food safety training within 30 days of being hired, however, did not retain supporting documentation.</p> | <p>Discussed School Nutrition Program Directors hired after July 1, 2015 must complete the required 8 hours of food safety training within 30 days of being hired or within 5 years prior to hire date. Reviewer was able to confirm Food Protection Manager Certification was obtained on 2/11/2021. Discussed record keeping requirements and timeframe of 5 years.</p> | <p><i>Please provide written assurance that all documents pertaining to the school meal programs will be retained on file for at least 5 years, as is required by Arizona law, as well as a written plan for ensuring that this requirement is met.</i></p> |
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**General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach**

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| <p>17 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.</p> | <p>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.</p> | <p><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></p> |
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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:

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Congratulations! The Boys & Girls Clubs of the Valley 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?

<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 checked="" type="checkbox"/> No- SSO SBP	<input type="checkbox"/> Yes- SSO SBP	\$0
<input checked="" type="checkbox"/> No- SSO NSLP	<input type="checkbox"/> Yes- SSO NSLP	\$0

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by April 25, 2022 to Jennifer McDonald at [Jennifer.McDonald@azed.gov](mailto:Jennifer.McDonald@azed.gov).



4/1/2022

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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