

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

## **Administrative Review Summary Report**

School Food Authority Name: Phoenix Hebrew Academy								
CTD: 07-20-97								
Site: Phoenix Hebrew Academy								
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Co	ntacts: Vanessa McGann, Office Manager &	Nadine Tuch, Food Service Direct	or					
	Review Date: March 30, 2022							
	Review Period: February 2022							
	Programs Reviewed:   National Sci	nool Lunch School Breakfast	Afterschool Snack					
	Fresh Fruit & Ve	getable Special Milk	At-Risk Afterschool Meals					
No.	Review Observations & Findings	Technical Assistance Provide	Required Corrective Action					
	Performance Standa	ard 1: Certification & Benefit Issuar	ce - Critical Area					
	Not Applicable							
		ndard 1: Meal Counting & Claiming						
1	Meal count totals for lunch for the month of		ed Please provide a written description of					
	review were not correctly combined and recorded. This was deemed a non-systemic	for this to happen and potential	changes that have been implemented to re ensure that the claim submitted accurately					
	error and contributed toward fiscal action	the claim is accurate.	reflects meal counts.					
	calculations.		reneste mear esame.					
	Performance Stand	ard 2: Meal Components & Quantiti	es - Critical Area					
2	During the week of review, all grains served at	The bread served during lunch was	Please provide an updated label for a bread					
	lunch were not whole grain rich; bread.	not whole grain rich. Discussed whole						
		grain-rich requirements and the optic	11.7					
		to use the meal pattern waiver due to	, ,, ,					
		supply chain issue if needed. HNS 30	)- the meal pattern waiver.					
		2021 Guidance on the Use of the School Year 2021-2022 Meal Pattern						
		Waiver found on ADE's website at						
		https://www.azed.gov/hns/memos.						
		Also referred to USDA's Whole Grain	ı					
		Resource for the National School						
		Lunch and Breakfast Programs: A						
		Guide to Meeting the Whole Grain-						
		Rich Criteria can be found on ADE's website at						
		https://www.azed.gov/hns/nslp/forms						
		under the Menu Planning tab.						

3 The following vegetable subgroups were not offered during the review period: beans/peas and dark green. This was not a repeat finding from the previous cycle and did not contribute toward fiscal action calculations.

Discussed vegetable subgroup served. Vegetable Subgroup Quick Guide can be found on ADE's website

https://www.azed.gov/hns/nslp/forms under the Menu Planning tab. Also flexibilities outlined in FNS Instruction 783-13; Variations in Meal Requirements for Religious Reasons for the dark green subgroup and notifying your ADE specialist if this is utilized. 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 vegetable subgroups may result in fiscal action and/or termination of performance-based

reimbursement (extra 7 cents).

Please provide one week of lunch production requirements for the age/grade groups records which demonstrate compliance with the vegetable subgroups. Additionally, please provide written assurance that moving forward, all menus will be planned to meet the vegetable subgroup requirements. Additionally, the certificate of completion of discussed option to utilize meal pattern Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.

4 On the day of review, the SFA ran out of food for students during lunch service. Around 12 students were not able to get a meal because the caterer forgot to drop off one of the bags with the lunches. The SFA provided alternative food that was leftover from breakfast and did not claim these meals.

dropped off and compare to the number on the production records. Production records should be utilized to adjust the number of meals ordered accordingly. Extra meals may need to be ordered in case trays are dropped or more students decide to eat since meals are free this year.

Discussed that the SFA should double- Please provide a written description of the check and count how many meals are changes that have been made to ensure that enough meals will be made available so all students have the option to take a reimbursable meal.

5 Recipes were not provided for menu items that Discussed that all menu items that contained more than 1 ingredient: pizza, pasta, contain more than 1 ingredient must tuna sandwich, grilled cheese.

have a standardized recipe. Standardized recipes must include the following information: recipe name, recipe number, ingredients and amounts, serving size, recipe yield, preparation instructions, HACCP process, and HACCP instructions. Standardized Recipe Template can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab.

Please provide an updated recipe for the pizza, pasta, tuna sandwich, and grilled cheese. Additionally, please provide written assurance that all items with more than 1 ingredient will have a recipe.

Observation.

Production records at breakfast are pre-filled with multiple items and portion size. Two entrée options are offered so they are circled to show which are paired together. Discussed using production records that aren't pre-filled and writing the items together on the production records so it's more clear which fruit is served with which entree during breakfast.

No corrective action required.

for "average number of participants per day".

Observation.

breakfast and lunch. The number of meals

served was used instead of number of

participants.

Prek is currently comingled. Discussed No corrective action required. that they could also choose to follow the Prek meal pattern and would need to maintain separate production records. Referred to SP 01-2018
Updated Infant and Preschool Meal
Patterns in the National School Lunch
Program and School Breakfast
Program; Questions and Answers.
Meal pattern requirements for CACFP can be found on ADE's website at https://www.azed.gov/hns/cacfp under

	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
;	The average number of participants per day  Discussed the error and what number  Was incorrectly recorded on the SFSP claim for should be used for the average  Please provide a copy of the most recent  SFSP claim to show the correct number use.

number of participants on the SFSP

claim.

the Meal Pattern accordion.

7 Daily edit checks are not being conducted.

Discussed how to complete daily edit checks using ADE's Daily Edit Check worksheet, specifically the simplified version for this year, and where to find the attendance factor. The Daily Edit Check Worksheet can be found on ADE's website at on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational tab. The Stepby-Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at

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

Please provide a completed daily edit check worksheet for the most recent month claimed. Additionally, please provide written assurance that daily edit checks will be conducted.

## Meal Pattern & Nutritional Quality: Offer Versus Serve

No findings.

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

8 Serve only signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast and lunch. Discussed requirement for reimbursable meal signage and provided sample to be posted. Printable POS Signage can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab.

Signage was posted during the day of review. No further corrective action required.

#### **Resource Management**

No findings.

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

9 The USDA nondiscrimination statement was not Discussed where to find printed on appropriate program materials nondiscrimination staten (menu). website at

nondiscrimination statement on ADE's website at https://www.azed.gov/hns/civilrights

https://www.azed.gov/hns/civilrights and whether long or short statement would be most appropriate. Please provide an updated menu with the correct nondiscrimination statement.

Additionally, please provide written assurance that all program materials have been updated with the proper language.

10 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. This is an annual requirement and the most updated template can be found on ADE's website at

https://www.azed.gov/hns/nslp/forms under the Outreach tab.

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.

11 Procedures for receiving and processing complaints alleging discrimination within the school meal programs are not in place.

receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., ADE, Food & Nutrition Services Southwest Regional Office, 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 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

Discussed site-specific procedures for Please provide a written description of the process and procedures for processing complaints alleging discrimination within FNS School Meal Programs.

12 Sufficient documentation to support accommodations for special diets has not been maintained. Specifically, there is no form made available to accommodate students with dietary Referred to Medical Statement for needs that diverge from meal pattern requirements.

Discussed requirements for accommodating special diets and the need for sufficient documentation. Students with Special Dietary Accommodations found on ADE's website at

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

https://www.azed.gov/hns/nslp/forms under the Operational tab. Additionally, referred to Accommodating Children with Disabilities in the School Meal Program found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals 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.

Please provide the form that will be used for students with special dietary accommodations.

13 Program staff have not been trained on civil rights topics.

Discussed requirement and how to document that requirement has been met. An acceptable civil rights power point training material can be found on ADE's website at

https://www.azed.gov/hns/civilrights.

Please provide written assurance that all food service staff will be trained at hire and on an annual basis 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.

14 The Civil Rights Compliance form is not being completed every year by December 15 and kept on file.

Discussed requirement for completing form annually by December 15th. The Civil Rights Compliance form will be 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

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

Please provide written assurance that the form can be found on ADE's website at completed by December 15 each year and kept on file for 5 years. Additionally, please indicate who will be responsible for completing this form.

	General Program Compliance: SFA On-Site Monitoring	
No findings.		
	General Program Compliance: Local Wellness Policy	
No findings.		
	General Program Compliance: Competitive Food Services	
No findings.		

15 The School Nutrition Program Director hired after July 1, 2015 did not meet the hiring standard requirement.

Please provide the hiring waiver approval Referred to hiring standard requirements and discussed the option from your ADE specialist. Additionally, the to apply for hiring waiver since the LEA certificate of completion of the Webinar: enrollment is under 500 and candidate Professional Standards 101 must be meets educational standards but has provided. less than 3 years experience. SFA will work with their Health and Nutrition Services Specialist to obtain a hiring waiver. The Webinar: Professional Standards 101 can be found on ADE's website at

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

16 The School Nutrition Program Director hired after July 1, 2015 did not complete the required for attending an available certification 8 hours of food safety training within 30 days of being hired or within 5 years prior to hire date.

Discussed requirement and feasibility training within current school year. Food Safety Online Courses can be found on ICN's website at https://theicn.org/icn-resources-aPlease provide the expected date that 8 hours of food safety training will be completed by the School Nutrition Program Director.

z/food-safety/.

#### **General Program Compliance: Water**

No findings.

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

17 The written food safety plan did not include adequate Standard Operating Procedures (SOPs) for the share table.

Discussed adding SOPs for using a share table. A template can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Food/Health Safety tab.

Please develop and provide reviewer with a copy of the SOPs that will be added to the written food safety plan.

18 Temperature logs are not being maintained for the fridge, freezer, dry storage, and food.

Discussed requirements for maintaining temperature logs for all applicable areas. Temperature logs 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, Food Safety Online Courses can be found on ICN's website at https://theicn.org/icnresources-a-z/food-safety/.

Please provide copies of the temperature logs that will be used for all areas as well as written assurance that logs will be kept daily and maintained on-file for 6 months.

19 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d): banana, mandarin oranges. Additionally, documentation justifying a Buy American exception was not maintained/on file.

requirements and procedures to ensure compliance. Referred to SP38-2017, Buy American Webinar and FAQ. 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.

Discussed the Buy American provision Please provide a written description of the changes that have been made to the recordkeeping procedures to ensure that the requirements of the Buy American Provision are met or provide a completed copy of the Buy American exception form for the nondomestic products.

### General Program Compliance: Reporting & Recordkeeping

20 Production records incorrectly documented the fruit and vegetable quantities served during lunch. Fruit was documented as 3/4c and vegetables were documented as 1/2c when they should have been switched around because the SFA was filling them out instead of the caterer. Reviewer was able to confirm appropriate portion sizes were served via other production records. documentation and through on site visit.

Discussed that the caterer should be filling out the portion size when they prepare the menu items, and the SFA should double-check this. Discussed the importance of ensuring that all components are clearly documented in appropriate quantities on the

Please provide copies of completed lunch production records for 5 consecutive days, as well as written assurance that production records will be completed accurately.

21 Milk was incorrectly documented on production Discussed that the two milk types need Please provide copies of completed lunch records during lunch; only one type was listed. Reviewer was able to confirm that the SFA was offering two milk types through other documentation.

to be listed separately on the production records during lunch and specify the type and quantity of each type offered.

production records for 5 consecutive days, as well as written assurance that production records will be completed accurately.

22 Milk was incorrectly documented on production Discussed that the both milk types records during breakfast; only one type was listed as being offered on 2/9 and 2/11. Reviewer was able to confirm that the SFA was typically only take the white milk. The offering two milk types through other documentation.

need to be listed on days cereal is served even though the students second milk type still needs to be documented that it was offered.

Please provide copies of completed breakfast production records for 5 consecutive days, as well as written assurance that production records will be completed accurately.

23 Production records for breakfast are not completed accurately; the planned, prepped, leftover, and used servings are not documented on the number of meals actually correctly.

The number of planned/prepped served. The production records during breakfast show zero leftover servings, however, there are plenty of meals available. Discussed that this should be documented in the prepped/planned section so that it reflects there was enough food planned during breakfast. 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 servings should not be recorded based production records for 5 consecutive days, 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.

24 The portion size of items is not accurately documented during breakfast on the production records; Dried fruit was 1/2c and should have been 1/4c. Apple and orange slices were 1/2c and should have been 1c. Grain items should just be "1" instead of ounce, or applicable portion size.

The portion size is incorrect for some of the fruit and grain items served portion size of the exact item served with the label and writing it in if the prefilled amount is incorrect. Since crediting information is not used the ounces doesn't need to be included if it's not how the item is portioned. Also, discussed using production records that don't have the items and quantities pre-filled so the SFA can write out the item and serving size on the day they are served. Production Record Templates 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 breakfast production records for 5 consecutive days, as during breakfast. Discussed confirming well as written assurance that all records will be maintained for 5 years.

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

25 Households were not notified of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year.

Discussed requirements of notifying families of the availability of the SFSP prior to the end of the school year even when the SFA is not operating summer feeding. Summer feeding locations can be found at https://www.azhealthzone.org/.

Please provide a description of how households will be notified of the availability of the SFSP prior to the end of the school year and written assurance that this will occur.

	Other Federal Program Reviews: Afterschool Snack Program	
Not applicable.		
	Other Federal Program Reviews: Seamless Summer Option	
Will be reviewed in S	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	

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Congratulations on completing the Administrative Review! Thank you for your hard work and cooperation during this process. Please keep up the great work!

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?				
✓ No- SBP	Yes- SBP	\$0		
✓ No- NSLP	Yes- NSLP	\$278.31		
✓ No- SSO SBP	Yes- SSO SBP	\$0		
✓ No- SSO NSLP	Yes- SSO NSLP	\$0		
Fiscal Action under \$600 will be disregarded.				

Please submit corrective action response by May 27, 2022 to Lindsey.Cler@azed.gov.

April 29, 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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