



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

Administrative Review Summary Report

School Food Authority Name: Buckeye Elementary District

CTD: 07-04-33

Site(s): Bales Elementary School, John S. McCain III Elementary School

Contacts: Kristi Sandvik, Superintendent / Jason Woods, Child Nutrition Director

Review Date: January 24 and 25, 2022

Review Period: December 2021

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

No Findings

Performance Standard 1: Meal Counting & Claiming - Critical Area

1	Meal count totals for breakfast at John S. McCain III Elementary for the month of review were not correctly combined and recorded. This was deemed a systemic error and contributed towards fiscal action calculations. A full recalculation of breakfasts served for December and January will be conducted.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue.	<i>A full recalculation of meals was conducted using counts from 30 operating days of utilizing the new counting and claiming procedures. No further corrective action is required.</i>
2	Meal count totals for breakfast at John S. McCain III Elementary on the day of review were not correctly combined and recorded. This was deemed a systemic error and contributed towards fiscal action calculations. A full recalculation of breakfasts served for the months of December and January will be conducted.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue.	<i>A full recalculation of meals was conducted using counts from 30 operating days of utilizing the new counting and claiming procedures. No further corrective action is required.</i>

Performance Standard 2: Meal Components & Quantities - Critical Area

3	Fluid milk was not available in at least two varieties at breakfast at John S. McCain III Elementary School during the week of review. This was determined not to be a repeat finding from previous cycle and did not contribute toward fiscal action calculations.	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).	<i>Corrective action has been received. No further corrective action is required.</i>
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- 4 The following vegetable subgroup(s) was/were not offered during the review period: other vegetables. This was determined not to be a repeat finding and did not contribute toward fiscal action calculations.
- Discussed vegetable subgroup requirements for the age/grade groups served. Vegetable Subgroup Quick Guide can be found on ADE's website at <https://www.azed.gov/hns/nslp/forms> under the Menu Planning 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 vegetable subgroups may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).
- Corrective action has been received. No further corrective action is required.*
- 5 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, minimum required vegetable subgroup quantities were not met for the following subgroups: dark green and red/orange. This was determined to be a repeat finding from previous cycle and contributed 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. 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-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).
- Corrective action has been received. No further corrective action is required.*

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| <p>6 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, on two days during the review period, vegetable quantities served did not meet the daily minimum requirement for vegetables. Additionally, the weekly minimum quantity requirement for vegetables was not met. This was determined to be a repeat finding from previous cycle and contributed toward fiscal action calculations.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. 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-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).</p> | <p><i>Corrective action has been received. No further corrective action is required.</i></p> |
| <p>7 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the weekly grain requirement was not met at lunch. This was determined to be a repeat finding from previous cycle and contributed toward fiscal action calculations.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. 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-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).</p> | <p><i>Corrective action has been received. No further corrective action is required.</i></p> |

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| <p>8 The following product could not be credited towards the meal pattern due to insufficient documentation: shredded chicken. Without sufficient documentation, the reviewer was unable to determine if the quantity requirements for meat/meat alternate were met at lunch. 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.</p> | <p>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 https://www.azed.gov/hns/memos. 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 https://www.azed.gov/hns/covid19 under the Reporting Food Supply Disruptions accordion.</p> | <p><i>Corrective action has been received. No further corrective action is required.</i></p> |
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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

No Findings

Meal Pattern & Nutritional Quality: Offer Versus Serve

No Findings

Meal Pattern & Nutritional Quality: Meal Components & Quantities

No Findings

Resource Management

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| 9 | Non-reimbursable meals served to students free of charge are not accurately tracked. Additionally, the cost of providing non-reimbursable meals was not covered using non-Federal funds. | Discussed that non-reimbursable meals provided to students free of charge must be accurately tracked to ensure that the nonprofit school food service account is reimbursed for the costs of providing these meals using non-Federal funds. Referred to SP 23-2017, Unpaid Meal Charges: Guidance and Q&A, Question 20. | <i>Corrective action has been received. No further corrective action is required.</i> |
| 10 | 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>Corrective action has been received. No further corrective action is required.</i> |
| 11 | The Revenue Ratio (proportion of total revenue from the sale of nonprogram foods to the total revenue of the school food service account) was not equal to or greater than the Food Cost Ratio (proportion of total food costs associated with obtaining nonprogram foods to the total costs associated with obtaining program and nonprogram foods from the account). | Discussed revenue from nonprogram food requirements and provided with Nonprogram Food Revenue Tool. Referred to FNS Instruction 782-5 REV. 1 for more information about pricing for nonprogram adult meals. Discussed best practices for pricing nonprogram foods and ways to increase revenue from the sale of nonprogram food. | <i>Corrective action has been received. No further corrective action is required.</i> |

General Program Compliance: Civil Rights

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| 12 | The USDA nondiscrimination statement was not printed on appropriate program materials. Specifically, the nondiscrimination statement was not present on the BIC parent letter and an incorrect statement was present on the summer meals outreach poster. | 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. | <i>Corrective action has been received. No further corrective action is required.</i> |
| 13 | All 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 . | <i>Corrective action has been received. No further corrective action is required.</i> |

General Program Compliance: SFA On-Site Monitoring

No Findings

General Program Compliance: Local Wellness Policy

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| 14 The Local Wellness Policy (LWP) did not contain goals for nutrition promotion. | Discussed feasible options for nutrition promotion goals that can be written into the LWP. Discussed activity ideas which included offering contests, surveys, promotions and/or taste testing, providing information to families to encourage consumption of healthy foods at home, and displaying nutrition and health posters throughout campus. Team Nutrition Resources can be found at http://www.teamnutrition.usda.gov/ . 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> |
| 15 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> |
| 16 There is not a designated Local Wellness Policy (LWP) oversight official. | Discussed LWP requirements. 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>Corrective action has been received. No further corrective action is required.</i> |

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| <p>17 The required stakeholders are not being permitted to be involved in the review and update of the Local Wellness Policy (LWP). Specifically, only the nutrition director and wellness coordinator are currently invited to the review and update of the LWP.</p> | <p>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.</p> | <p><i>None required at this time.</i></p> |
| <p>18 The public is not being notified of the existence and contents of the Local Wellness Policy (LWP). Specifically, the most recent version of the LWP has not been made publicly available.</p> | <p>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.</p> | <p><i>None required at this time.</i></p> |

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 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: Tuna Chunk Light Skipjack in Water with Additives, red grapes (lunch bunch). While Buy American exception forms were provided, supporting documentation for these exceptions is not being maintained. Additionally, forms are not complete (check marks left blank).
- 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 <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.
- Corrective action has been received. No further corrective action is required.*
- 20 Temperature logs for dry storage were not being maintained at John S McCain III Elementary. Specifically, dry storage temperatures were not recorded in the month of January.
- Discussed requirements for maintaining food storage area temperature logs, sample templates, and who would be responsible. Temperature logs for food storage areas 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, discussed Food Safety Online Courses can be found on ICN's website at <https://theicn.org/icn-resources-a-z/food-safety/>.
- Corrective action has been received. No further corrective action is required.*

General Program Compliance: Reporting & Recordkeeping

- 21 Production record crediting was not accurate on the day of review (1/24/2022) at Bales Elementary. Specifically, the record stated the serving size of the corn dog to be 6 each when the actual serving size was 1 each.
- 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.
- Please provide an updated production record with accurate crediting.*

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

No Findings

Other Federal Program Reviews: Afterschool Snack Program

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| 22 | The counting system employed at Bales Elementary School and John S McCain Elementary School 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. | <i>Corrective action has been received. No further corrective action is required.</i> |
| 23 | Production records do not support that the Afterschool Snack Program (ASP) meal pattern was met on the following dates at Bales Elementary: 12/7/21, 12/8/21, 12/9/21, and 12/10/21. | Discussed the meal pattern requirements of the ASP. The ASP meal pattern table can be found on ADE's website at https://www.azed.gov/hns/afterschool under the Meal Pattern tab. | <i>Corrective action has been received. No further corrective action is required.</i> |
| 24 | Production records do not support that the Afterschool Snack Program (ASP) meal pattern was met on the following dates at John S McCain III Elementary School: 12/8/21 and 12/9/21. | Discussed the meal pattern requirements of the ASP. The ASP meal pattern table can be found on ADE's website at https://www.azed.gov/hns/afterschool under the Meal Pattern tab. | <i>Corrective action has been received. No further corrective action is required.</i> |

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 hard work in completing the Administrative Review process! Your focus on providing students' with healthy meals every day is commendable. 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.

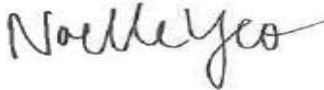
Training: In-person classes, web-based training and How-To guides can be found on ADE's website at <https://www.azed.gov/hns/nslp/training>.

Fiscal Action Assessed?

- No- SBP Yes- SBP
- No- NSLP Yes- NSLP \$20,272.22
- No- SSO SBP Yes- SSO SBP
- No- SSO NSLP Yes- SSO NSLP

Fiscal Action under \$600 will be disregarded.

Sufficient corrective action has been completed and this review is now closed.



5/24/2022

Reviewer Signature

Date

Kerrie Zigler

Digitally signed by Kerrie
Zigler
Date: 2022.05.24 15:56:28
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Director 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.

Equity for all students to achieve their full potential
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