



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

Administrative Review Summary Report

School Food Authority Name: Hunters Point Boarding School

CTD: 01-40-06

Site: Hunters Point Boarding School

Contacts: Relando Catron, Cook & Julia Donald, Principal

Review Date: April 21, 2022

Review Period: March 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

1	Meal count totals for breakfast for the month of review were not correctly combined and recorded. This was deemed a non-systemic error and did not contribute 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. SFA had underclaimed during breakfast but revised the claim since it was within the 60 day claiming period.	<i>Please provide a written description of changes to the system that have been implemented to ensure that claims are accurate.</i>
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Performance Standard 2: Meal Components & Quantities - Critical Area

2	An unallowable milk type was served at breakfast and lunch on the day of review. Specifically, low-fat flavored milk was served. This was not a repeat finding and therefore did not contribute to fiscal action.	Discussed that allowable milk varieties are fat-free unflavored, fat-free flavored, and low-fat unflavored. Also discussed that the meal pattern waiver is available if there are supply chain issues with getting an appropriate milk type. Please note that repeated violations involving milk requirements may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).	<i>Please provide one week of breakfast and lunch production records that demonstrate that allowable milk types were served. Additionally, please provide written assurance that low-fat flavored milk will not be served moving forward.</i>
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| 3 | An unallowable milk type was served at breakfast and lunch during the week of review. Specifically, low-fat flavored milk was served. This was not a repeat finding and therefore did not contribute to fiscal action. | Discussed that allowable milk varieties are fat-free unflavored, fat-free flavored, and low-fat unflavored. Also discussed that the meal pattern waiver is available if there are supply chain issues with getting an appropriate milk type. Please note that repeated violations involving milk requirements may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents). | <i>Please provide one week of breakfast and lunch production records that demonstrate that allowable milk types were served. Additionally, please provide written assurance that low-fat flavored milk will not be served moving forward.</i> |
| 4 | During the week of review, all grains served at lunch were not whole grain rich; fry bread. | The flour in the fry bread was not whole grain rich and this was not because of the meal pattern waiver or supply chain issue. Discussed whole grain-rich requirements. USDA's Whole Grain 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. | <i>Please provide an updated label and recipe for the fry bread to demonstrate it meets whole grain rich requirements or provide written assurance it will no longer be served.</i> |
| 5 | Meal pattern requirements were not met due to supply chain disruptions. The SFA did opt into the Nationwide Waiver to Allow Specific School Meal Pattern Flexibility for School Year 2021-2022, however, they did not provide supporting documentation for utilizing the meal pattern waiver for serving non-whole grain rich items during breakfast (muffin, toast, cream of wheat, biscuit) and lunch (tortilla chips). | SFA indicated participating in the Nationwide Waiver to Allow Specific School Meal Pattern Flexibility for School Year 2021-2022 in their NSLP Sponsor application. Additionally, the SFA will need to provide supporting documentation for serving a non-whole grain rich items at breakfast and lunch during the week of review. Referred to 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 . | <i>Please provide supporting documentation for serving non-whole grain rich items at breakfast and lunch during the week of review; muffin, toast, cream of wheat, biscuit, tortilla chips. Additionally, provide written assurance that you will retain documentation to justify that the meal pattern flexibilities used were due to supply chain disruptions.</i> |

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

6	Daily edit checks are not being conducted.	Discussed how to complete daily edit checks using ADE's Simplified Daily Edit Check worksheet 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 at https://www.azed.gov/hns/nslp/forms under the Operational tab. The Step-by-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.	<i>Please provide a completed daily edit check worksheet for the most recent claiming month. Additionally, please provide written assurance that daily edit checks will be conducted.</i>
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Meal Pattern & Nutritional Quality: Offer Versus Serve

No findings.

Meal Pattern & Nutritional Quality: Meal Components & Quantities

7	Serve only signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast and lunch.	Discussed requirement for posting serve only signage. 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 will be displayed to students that demonstrates what constitutes a reimbursable meal at breakfast and lunch. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i>
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No finding.

Discussed using production records without meal pattern contribution since the SFA does not utilize that part of the production record. Referred to ADE template under Program Forms, Menu Planning -
<https://www.azed.gov/hns/nslp/forms>.

None required.

Resource Management

8	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.	Adult meals were provided for free. Discussed that adult meals should be covered by non-federal funds or should be priced appropriately and how to do that. Referred to HNS 27-2021 Guidance for Adult Meal Pricing in School Year 2021-2022 (SY 22). Discussed using the appropriate adult meal pricing tool for next school year when it becomes available.	<i>Please provide a written description of the steps that will be taken to cover the cost of adult meals and how that cost will be determined.</i>
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General Program Compliance: Civil Rights

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| 9 The incorrect public/media release was provided to local media, the unemployment office and local employers considering large layoffs. | Discussed using the most current template for the media release each school year, which can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Outreach tab. | <i>Please provide written assurance that the correct version of the media release will be used.</i> |
| 10 Procedures for receiving and processing complaints alleging discrimination within the school meal programs are not in place. | Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., ADE, USDA). The SFA's procedures must note whether an allegation is made verbally or in person. 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 https://www.azed.gov/hns/nslp/training under the Online Training Library tab. | <i>Please provide a written description of the process and procedures for processing complaints alleging discrimination within FNS School Meal Programs.</i> |
| 11 Program staff have not been trained on civil rights topics. | Staff were trained on a different topic. 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>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> |

General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

12	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>
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General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

13	The School Nutrition Program Director hired after July 1, 2015 did not meet the hiring standard requirement.	Referred to hiring standard requirements and discussed the option to apply for hiring waiver since the LEA enrollment is under 500 and candidate meets educational standards but has 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.	<i>Please provide the hiring waiver approval from your ADE specialist. Additionally, the certificate of completion of the Webinar: Professional Standards 101 must be provided.</i>
14	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 8 hours of food safety training will be completed by the School Nutrition Program Director.</i>

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

15	The food safety plan was not site specific.	ADE's food safety prototype was being utilized, but it wasn't filled out. Discussed that the applicable sections being utilized should be marked off and the SOPs being used should be dated.	<i>Please provide a written description of the changes that will be made to ensure the food safety plan is utilized correctly and provide written assurance that the food safety plan will be site specific.</i>
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| 16 | Documentation was not maintained to support that the school received two food safety inspections from the local health department each school year, or that the school requested two food safety inspections each year from the local health department. | Discussed that the school must request two inspections from the local health department per school year or maintain documentation to show that two food safety inspections were requested from the local health department each school year. | <i>Please provide a written description of how you will ensure that two food safety inspections from the local health department will be obtained and/or documented that two were requested each school year.</i> |
| 17 | The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) at the reviewed school: mandarin oranges. 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. 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. | <i>Please provide a written description of the changes that have been made to procurement and/or provide a completed Buy American exception form.</i> |
| 18 | Temperature logs for food items are not being maintained. | Discussed requirement for maintaining food temperature logs or recording it on the production records. Temperature logs for food 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. | <i>Please provide a copy of the temperature log that will be used for food as well as written assurance that logs will be kept daily and maintained on-file for 6 months.</i> |

General Program Compliance: Reporting & Recordkeeping

No findings.

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

No findings.

Other Federal Program Reviews: Afterschool Snack Program

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| 19 Adequate point of service snack counts are not being maintained. Counts are based on total number of snacks delivered to classrooms. This contributed to fiscal action calculations. | Discussed that point of service snack counts must demonstrate when a reimbursable snack has been served to a student and options for the type of counting system that would be appropriate. | <i>Please provide a written description of the system that will be implemented to ensure accurate snack counts are maintained.</i> |
| 20 The Afterschool Snack Program (ASP) monitoring review was not conducted within the first four weeks of operation and one additional time during the school year. | Discussed ASP monitoring requirements. A sample ASP monitoring form can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational tab. | <i>Please provide written assurance that the ASP will be monitored once within the first four weeks of operation and one additional time during the school year, and that documentation to support this will be maintained.</i> |
| 21 Production records do not support that the Afterschool Snack Program (ASP) meal pattern was met on the following dates: 3/22/22 and 3/24/22 due to the fruit/juice quantity being 1/2 cup instead of the 3/4 cup requirement. | 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>Please provide ASP production records for 5 consecutive days that demonstrate that the ASP meal pattern requirements have been met. Additionally, please provide written assurance that the ASP meal pattern will be adhered to at all times.</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:

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?

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| <input checked="" type="checkbox"/> No- SBP | <input type="checkbox"/> Yes- SBP | \$0 |
| <input type="checkbox"/> No- NSLP | <input checked="" type="checkbox"/> Yes- NSLP | \$851.00 |
| <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 |

Please submit corrective action response by July 13, 2022 to Lindsey.Cler@azed.gov.



June 13, 2022

Reviewer Signature

Date

Kerrie Zigler Digitally signed by Kerrie Zigler
Date: 2022.06.10 10:33:51
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Program 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.

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