



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

Administrative Review Summary Report

School Food Authority Name: Incito Schools

CTD: 07-82-10

Site(s): Incito Schools

Contacts: Amanda Jelleson, Executive Director; Lucy Medina, NSLP Coordinator

Review Date: April 14, 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 lunch during the month of review (March) were not correctly combined and recorded. This was deemed a non-systemic error 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.	<i>Please provide a written description of changes to the system that have been implemented to ensure that meal service lines provide an accurate count by eligibility category.</i>
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Performance Standard 2: Meal Components & Quantities - Critical Area

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

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| 2 | Daily edit checks are not being conducted. | Discussed how to complete daily edit checks using ADE's Daily Edit Check worksheet. The Daily Edit Check Worksheet can be found on ADE's website 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 month of April. Additionally, please provide written assurance that daily edit checks will be conducted. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete Daily Edit Checks must be submitted.</i> |
| 3 | A new Free and Reduced-Price Policy Statement was not submitted to ADE when a new NSLP coordinator was hired. Therefore, the Free and Reduced-Price Policy Statement Addendum provided does not reflect current practices and procedures. | Referred them to FRPPS template found on ADE's website at https://www.azed.gov/hns/nslp/forms 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> |
| 4 | The site application in CNPWeb does not accurately reflect the point of service procedures that were observed on-site. Specifically, the site applications indicate the site is operating Offer Vs. Serve when it is actually operating Serve Only. | 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. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i> |

Meal Pattern & Nutritional Quality: Offer Versus Serve

Not Applicable

Meal Pattern & Nutritional Quality: Meal Components & Quantities

No Findings

Resource Management

No Findings

General Program Compliance: Civil Rights

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| 5 | 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>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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| 6 | The Civil Rights Compliance form is not being completed every year by December 15 and kept on file. | Discussed requirement for completing form and how to collect racial/ethnic data from program participants. The form can be found on ADE's website at 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 at https://www.azed.gov/hns/nslp/training under the Online Training Library tab. | <i>Please provide written assurance that the Civil Rights Compliance form will be completed by December 15 each year and kept on file for 5 years. Additionally, please indicate who will be responsible for completing this form. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form must be submitted.</i> |
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General Program Compliance: SFA On-Site Monitoring

No Findings

General Program Compliance: Local Wellness Policy

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| 7 | A Local Wellness Policy (LWP) has not been developed. | Discussed preliminary planning, such as who will be named as the designated LWP official and how required stakeholders will be invited to participate in the process. Reviewed handouts and discussed developing a LWP with required elements. Local Wellness Policy resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Local Wellness Policy tab. 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>Please provide a written plan for development of a Local Wellness Policy. This plan must include who will be designated as the oversight official, who will be invited to participate in the development process and the date by which the policy is expected to be completely developed and adopted. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.</i> |
| 8 | The Local Wellness Policy (LWP) did not contain goals for nutrition education. | Discussed developing a LWP with goals for nutrition education. Discussed nutrition education activity ideas which included integrating nutrition into health education classes, promoting skill development and integrating nutrition into core subjects. 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>Please provide a written plan for how the missing elements of the LWP will be included. The plan should include draft language of the element(s) to be added, who will be involved in updating the LWP and the date the update is expected to be completed. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.</i> |

- 9 The Local Wellness Policy (LWP) did not contain goals for physical activity.
- Discussed developing a LWP with goals for physical activity. Made suggestions to include the number of days per week or minutes per day that students would receive physical activity in addition to physical assessments. 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.
- Please provide a written plan for how the missing elements of the LWP will be included. The plan should include draft language of the element(s) to be added, who will be involved in updating the LWP and the date the update is expected to be completed. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.*
- 10 The Local Wellness Policy (LWP) did not contain goals for other school-based activities.
- Discussed developing a LWP with goals for other school-based activities. Discussed other school-based activity ideas which included the HealthierUS School Challenge, offering staff wellness training to inspire them to serve as role models, sponsoring health fairs and incorporating school gardens and/or the Farm to School Program. 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.
- Please provide a written plan for how the missing elements of the LWP will be included. The plan should include draft language of the element(s) to be added, who will be involved in updating the LWP and the date the update is expected to be completed. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.*
- 11 The Local Wellness Policy (LWP) did not contain nutrition guidelines for all foods and beverages sold to students on the school campus during the school day.
- Discussed developing a LWP with nutrition guidelines for all foods and beverages sold to students that meet Federal regulations. 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.
- Please provide a written description of the changes that will be made to the LWP to meet the requirements for nutrition guidelines for all food and beverages sold to students. The description should include draft language, who will be involved in updating the LWP and the date the update is expected to be completed.*
- 12 The Local Wellness Policy (LWP) did not contain nutrition standards for all foods and beverages provided, but not sold, to students on the school campus during the school day.
- Discussed developing a LWP with nutrition standards for all foods and beverages provided, but not sold, to students. 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.
- Please provide a written plan for how the missing elements of the LWP will be included. The plan should include draft language of the element(s) to be added, who will be involved in updating the LWP and the date the update is expected to be completed. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.*

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| 13 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> |
| 14 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> |
| 15 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>Please provide a written plan for how the missing element of the LWP will be included. The plan should include draft language of the element to be added, who will be involved in updating the LWP and the date the update is expected to be completed. Additionally, provide written assurance that the LWP will be specific to your institution.</i> |
| 16 The public is not being notified of the existence and contents of the Local Wellness Policy (LWP). | 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. | <i>None required at this time.</i> |

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| 17 | The Local Wellness Policy (LWP) does not specify how and when a review and update of the policy is to occur. | Discussed the best setting and timeframe for the periodic review and update of the LWP as well as how this can be included in 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. | <i>None required at this time.</i> |
| 18 | The required stakeholders are not being permitted to be involved in the review and update of the Local Wellness Policy (LWP). Specifically, only the leadership team is involved in the review and update. | 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. | <i>None required at this time.</i> |
| 19 | Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the Local Wellness Policy (LWP). | Discussed feasible means of notifying potential stakeholders of their ability to participate. 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> |

General Program Compliance: Competitive Food Services

No Findings

General Program Compliance: Professional Standards

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| 20 | 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 food safety certification training will be completed by the School Nutrition Program Director.</i> |
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General Program Compliance: Water

No Findings

General Program Compliance: Food Safety, Storage and Buy American

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| 21 | The written food safety plan did not include adequate SOPs for operating the snack program. | 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 https://www.azed.gov/hns/nslp/forms under the Food/Health Safety tab. | <i>Please provide a copy of the SOPs and CCPs found in the written food safety plan for operating the snack program.</i> |
| 22 | 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>Please provide a photo demonstrating that the most recent food safety inspection report has been posted in a location where the program participants can view it. Additionally, please specify where the report has been posted.</i> |
| 23 | Temperature logs for food storage areas are not being maintained for the dry storage area. | 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/ . | <i>Please provide a copy of the temperature log that will be used for the dry food storage area as well as written assurance that logs will be kept daily and maintained on-file for 6 months.</i> |

General Program Compliance: Reporting & Recordkeeping

- 24 Production records during the review period for breakfast and lunch did not contain all required sections: planned servings, prepped servings, and leftover servings. Discussed required sections of production records. Production Record Templates can be found on ADE's website at <https://www.azed.gov/hns/nslp/forms> under the Menu Planning tab. 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 and lunch 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.*
- 25 Production records for breakfast during the review period provided did not contain all required sections: Specifically, milk varieties were not listed separately but, rather, were listed as a single menu item. Discussed required sections of production records. Production Record Templates can be found on ADE's website at <https://www.azed.gov/hns/nslp/forms> under the Menu Planning tab. 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 production records for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years.*
- 26 Production records did not accurately reflect what is being served. Specifically, the production record for lunch on 3/9/2022 listed mixed vegetables when broccoli was actually served. Additionally, it listed both chicken patty and chicken tenders when only chicken tenders were served. Discussed that although menus are subject to change, the production records should be updated to accurately reflect what was prepared and served. *Please provide a written assurance that production records will be updated to accurately reflect the menu items prepared and served. Additionally, please provide written assurance that all records will be maintained for 5 years.*

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

- 27 Documentation was not maintained to support that outreach to families regarding the availability of the School Breakfast Program (SBP) was conducted at the beginning of or during the school year. Discussed methods of notifying families of the availability of the SBP at the start of and throughout the school year. Additionally, discussed SBP reminders must include: serving times, locations where breakfast is available, and SBP costs. *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.*

28 Households were not notified of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year.	Discussed methods of notifying families of the availability of the SFSP prior to the end of the school year and determined which was most feasible. Discussed which entities in the local area operate the SFSP and how to notify families. Summer feeding locations can be found at https://www.azhealthzone.org/ .	<i>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. If you do not plan to operate the SFSP and no other entities reasonably close to your site operate the SFSP, please provide a description of other community resources that will be provided to households prior to the end of the school year.</i>
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Other Federal Program Reviews: Afterschool Snack Program

29 The Afterschool Snack Program (ASP) monitoring review was not conducted within the first four weeks of operation.	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>
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Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2022 if applicable.

Other Federal Program Reviews: Fresh Fruit & Vegetable Program

No Applicable

Other Federal Program Reviews: Special Milk Program

Not Applicable

Other Federal Program Reviews: At-Risk Afterschool Meals

Not Applicable

Comments/Recommendations:

Congratulations - Incito Schools has completed the Administrative Review for SY21-22! Thank you for your hard work during the review process. I enjoyed learning about your program and the witnessing the healthy school meals you provide to your students!

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.

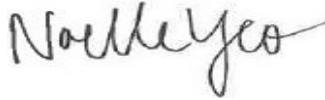
Training: In-person classes, web-based training and How-To guides can be found on ADE's website at <https://www.azed.gov/hns/nslp/training>.

Fiscal Action Assessed?

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| <input checked="" type="checkbox"/> No- SBP | <input type="checkbox"/> Yes- SBP | \$10.42 |
| <input checked="" type="checkbox"/> No- NSLP | <input type="checkbox"/> Yes- NSLP | \$59.31 |
| <input type="checkbox"/> No- SSO SBP | <input type="checkbox"/> Yes- SSO SBP | TBD |
| <input type="checkbox"/> No- SSO NSLP | <input type="checkbox"/> Yes- SSO NSLP | TBD |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by June 10, 2022 to Noelle Yeo at Noelle.Yeo@azed.gov.



5/12/2022

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.

Equity for all students to achieve their full potential
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