



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

Administrative Review Summary Report

School Food Authority Name: Nazlini Community School

CTD: 01-39-02

Site(s): Nazlini Community School

Contacts: David Moore, Principal and Gary Woody, Food Service Supervisor

Review Date: April 27, 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

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| 1 | During the month of review, it was found that there were 2 days in which the meal counts exceeded the number of eligible reimbursable meals. Specifically, during breakfast on March 28th and 29th. On March 28th, meals claimed exceeded by 8 and on the 29th meals claimed exceeded by 6. This 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 using daily edit checks to monitor this. An Active Daily Edit Check Worksheet can be found on ADE's website at http://www.azed.gov/hns/nsfp/forms/ under the Operational tab. | <i>Please provide a written description of changes to the system that have been implemented to ensure that meal counts do not exceed the number of eligible students.</i> |
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Performance Standard 2: Meal Components & Quantities - Critical Area

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| 2 | The following vegetable subgroup(s) was/were not offered during the review period: Beans/Peas (Legumes). This was determined not to be a repeat finding from the previous cycle and will 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/nsfp/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/nsfp/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). | <i>Please provide one week of lunch production 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 Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.</i> |
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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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| 3 | Daily edit checks are not being conducted appropriately. Specifically, the attendance factor on the daily edit check does not match the attendance factor on the monthly reimbursement claims. | 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 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 May. 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> |
| 4 | The site application in CNPWeb does not accurately reflect the weekly days of operation that were observed during the review period. Specifically, the site operates 4 days a week with students participating virtually on Fridays. | 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 weekly days of operation. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i> |
| 5 | Alternate point of service that have not been approved by ADE were observed while on-site. Specifically, point of service in the classroom. | 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 alternate 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

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| 6 | 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. Specifically, nonprogram adults pay \$3.50 for lunch and \$2.25 for breakfast. The current rates for lunch is \$4.58 and breakfast is \$2.72. | 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>Please provide a written description of the steps which have been taken to increase adult meal prices and resolve the discrepancy, including the exact formula used to price adult meals. Additionally, please submit supporting documentation which reflects that prices have been increased to the appropriate level.</i> |
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| 7 | The Financial Management System utilized was insufficient to accurately identify and track all revenues and expenditures of the nonprofit school food service program. | Discussed feasibility for designating a separate financial account for the nonprofit school food service, as well as the requirement to differentiate revenues and expenditures of the nonprofit school food service program if a separate account cannot be designated. Discussed the importance of establishing a financial management system and internal controls needed to accurately track all revenues and expenditures of the nonprofit school food service program. | <i>Please provide a written description of steps that will be taken to ensure all revenues and expenditures of the nonprofit school food service account are easily identifiable as required in 7 CFR 210.14.</i> |
| 8 | Net cash resources available in the nonprofit school food service account exceed the three month expenditure limit and approval from the ADE was not obtained. | Discussed requirement that net cash resources must be limited to an amount that does not exceed 3 months average expenditures without prior approval from the ADE. Referred to 7 CFR 210.19. | <i>Please provide documentation reflecting that net cash resources are below the 3 month average expenditure limit or provide a detailed spending plan to ADE for approval to maintain a balance in excess of the net cash resource limit.</i> |
| 9 | A plan for spending the \$5,929.22 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 https://www.azed.gov/hns/memos . | <i>Please provide a written plan for spending the \$5,929.22 emergency operational costs funds.</i> |

General Program Compliance: Civil Rights

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| 10 | 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/nsip/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

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| 11 On-site reviews of the lunch meal counting and claiming procedures for all sites within the SFA are not being conducted each year prior to February 1. | Discussed requirement and where to find a template Internal On-Site Monitoring Form-Lunch of the Meal Counting and Claiming System found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational tab. Discussed who would be responsible for completing this each year. | <i>Please provide a completed Internal On-Site Monitoring Form of the Meal Counting and Claiming System. Additionally, please provide a written description of the process that has been put in place to ensure that all sites receive an on-site review of the meal counting and claiming procedures each year prior to February 1.</i> |
| 12 On-site reviews of the breakfast meal counting and claiming procedures for 50% of the sites within the SFA are not being conducted each year prior to February 1. | Discussed requirement and where to find a template Internal On-Site Monitoring Form-Breakfast of the Meal Counting and Claiming System found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational tab. Discussed who would be responsible for completing this each year. | <i>Please provide a completed Internal On-Site Monitoring Form of the Meal Counting and Claiming System. Additionally, please provide a written description of the process that has been put in place to ensure that 50% of the sites operating breakfast will receive an on-site review of the meal counting and claiming procedures each year prior to February 1.</i> |

General Program Compliance: Local Wellness Policy

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| 13 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. | <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> |
| 14 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> |
| 15 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. | <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> |

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.

None required at this time.

16 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.

None required at this time.

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

17 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d). Specifically, bananas served during the review period. 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 <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.

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.

General Program Compliance: Reporting & Recordkeeping

18 The Off-SAT was not submitted to ADE on time. Discussed reporting requirements for Off-SAT and who would be responsible for submitting. *Please provide written assurance that the Off-SAT will be submitted on time to ADE as is required by the due date each Administrative Review period, as well as the steps that will be taken to ensure this requirement is adhered to.*

Specifically, the Resource Management questions 700-714 were unanswered and/or incomplete.

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

No Findings

Other Federal Program Reviews: Afterschool Snack Program

Not Applicable

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! Nazlini Community School has completed their Administrative Review for the 2021-2022 school year. Thank you for the hospitality and the warm welcoming.

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 | \$0.00 |
| <input type="checkbox"/> No- NSLP | <input checked="" type="checkbox"/> Yes- NSLP | \$51.24 |
| <input checked="" type="checkbox"/> No- SSO SBP | <input type="checkbox"/> Yes- SSO SBP | \$0.00 |
| <input checked="" type="checkbox"/> No- SSO NSLP | <input type="checkbox"/> Yes- SSO NSLP | \$0.00 |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by July 12, 2022 to Danielle Kirksey at Danielle.Kirksey@azed.gov.

Danielle
Kirksey

Digitally signed by Danielle
Kirksey
Date: 2022.06.06 11:32:50
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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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