



## Arizona Department of Education Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Peach Springs Unified District

CTD: 08-02-08

Site(s): Peach Springs School

Contacts: William Santiago, Superintendent / Gloria Herrera, Business Manager

Review Date: March 22, 2022

Review Period: February, 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	Daily edit checks are not being conducted appropriately. Specifically, the attendance number was used instead of attendance adjusted enrollment.	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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational tab. The Step-by-Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab.	<i>Please provide a completed daily edit check worksheet for the month of March. 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>
2	Meal count totals for breakfast and lunch during the month of review were not correctly combined and recorded. Specifically, on several instances the numbers marked off on the daily meal count sheets did not match the total number written on the page or numbers were not marked off but a number was written on the total. Additionally, when consolidating the claim for reimbursement, "take home" meals were counted on the day of distribution rather than the day of their intended consumption. 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 counts are accurately recorded and consolidated for the claim for reimbursement.</i>

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**Performance Standard 2: Meal Components & Quantities - Critical Area**

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| <p>3 On the day of review, it was observed that 4 meals counted for reimbursement did not contain all of the required meal components at breakfast. This contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 7 cents) until sufficient corrective action is received.</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. The Recognizing a Reimbursable Meal at the Point of Service and/or Recognizing a Reimbursable Breakfast Meal at the Point of Service Recorded Webinar &amp; Webinar Slides can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that all meals counted for reimbursement contain all of the required meal components. Additionally, the certificate of completion of Recognizing a Reimbursable Meal at the Point of Service must be submitted.</i></p> |
| <p>4 On the day of review, it was observed that 8 meals counted for reimbursement did not contain all of the required meal components at lunch. This contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 7 cents) until sufficient corrective action is received.</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. The Recognizing a Reimbursable Meal at the Point of Service and/or Recognizing a Reimbursable Breakfast Meal at the Point of Service Recorded Webinar &amp; Webinar Slides can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that all meals counted for reimbursement contain all of the required meal components.</i></p>   |

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| <p>5 Portion sizes observed during the month of review did not meet minimum amounts required by the breakfast meal pattern. Specifically, on 2/10/22, 6" whole wheat tortilla (1) crediting as 0.75 ounce equivalents was served with 2.0 ounce equivalents of cheese sticks. Meat/meat alternates may not be counted toward the grain component until after the minimum daily grains requirement (1.0 ounce equivalents) is offered.</p>  | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. Meal pattern requirements for the National School Breakfast Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step-by-Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> 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>Please provide one week of breakfast production records which demonstrates that at least 1.0 equivalent of grains was offered prior to crediting Meat/Meat Alternates toward the grain component. Additionally, please provide a written description of the changes that have been made to ensure that at least 1.0 ounce equivalent of grain will be offered prior to crediting Meat/Meat Alternates toward the grain component. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Breakfast Menu must be submitted.</i></p> |
| <p>6 Documentation did not support that all required meal components were offered and served during the review period. Specifically, grain was not served on 2/8/2022 at lunch. This contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 7 cents) until sufficient corrective action is received.</p>  | <p>Discussed requirements for recordkeeping and/or meal pattern requirements for the grade groups served. Discussed specific missing items and suggested changes.</p>  | <p><i>Please provide a written description of the changes that have been made to the menu to bring it into compliance with the meal pattern requirements.</i></p>  |
| <p>7 Documentation did not support that all required meal components were offered and served during the review period. Specifically, the beans/peas subgroup was not served at lunch during the week of review. This was not a repeat finding and did not contribute toward fiscal action calculations.</p>  | <p>Discussed requirements for recordkeeping and/or meal pattern requirements for the grade groups served. Discussed specific missing items and suggested changes.</p>  | <p><i>Please provide a written description of the changes that have been made to the menu to bring it into compliance with the meal pattern requirements.</i></p>  |
| <p>8 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the daily minimum vegetable requirement was not met at lunch on 2 days during the week of review. This was determined to be a repeat finding from previous cycle and contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 7 cents) until sufficient corrective action is received.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab.</p>  | <p><i>Please provide a written description of the changes that have been made to ensure that daily vegetable quantities meet minimum amounts required by the meal pattern.</i></p>   |

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| 9  | Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the weekly minimum vegetable requirement was not met at lunch during the week of review. This was determined to be a repeat finding from previous cycle and contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 7 cents) until sufficient corrective action is received.  | Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab. | <i>Please provide a written description of the changes that have been made to ensure that weekly vegetable quantities meet minimum amounts required by the meal pattern.</i>          |
| 10 | Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the weekly minimum vegetable subgroup requirement was not met at lunch for the following vegetable subgroups: red/orange and other. This was determined to be a repeat finding from previous cycle and contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 7 cents) until sufficient corrective action is received. | Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab. | <i>Please provide a written description of the changes that have been made to ensure that weekly vegetable subgroup quantities meet minimum amounts required by the meal pattern.</i> |
| 11 | Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the minimum daily grain requirement was not met at lunch on 2/10/22. This was determined to be a repeat finding from previous cycle and contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 7 cents) until sufficient corrective action is received.  | Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab. | <i>Please provide a written description of the changes that have been made to ensure that daily grain quantities meet minimum amounts required by the meal pattern.</i>               |

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| <p>12 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the minimum weekly grain requirement was not met at lunch during the week of review. This was determined to be a repeat finding from previous cycle and contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 7 cents) until sufficient corrective action is received.</p>               | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that weekly grain quantities meet minimum amounts required by the meal pattern.</i></p>               |
| <p>13 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the minimum daily meat/meat alternate requirement was not at lunch met on 2/7/22. This was determined to be a repeat finding from previous cycle and contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 7 cents) until sufficient corrective action is received.</p>                  | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that daily meat/meat alternate quantities meet minimum amounts required by the meal pattern.</i></p>  |
| <p>14 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the minimum weekly meat/meat alternate requirement was not met at lunch during the week of review. This was determined to be a repeat finding from previous cycle and contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 7 cents) until sufficient corrective action is received.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that weekly meat/meat alternate quantities meet minimum amounts required by the meal pattern.</i></p> |

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**Performance Standard 2: Dietary Specifications & Nutrient Analysis - Critical Area**

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No Findings

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**Meal Access & Reimbursement: Certification & Benefit Issuance**

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Not Applicable

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**Meal Access & Reimbursement: Verification**

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Not Applicable

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**Meal Access & Reimbursement: Meal Counting & Claiming**

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| 15 | The Free and Reduced-Price Policy Statement was not provided during the Administrative Review. However, the FRPPS on-file at ADE does not reflect current practices and procedures observed on-site. Specifically, the FRPPS is signed by previous staff and superintendent. | Referred them to FRPPS template on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> 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> |
| 16 | The site application in CNPWeb does not accurately reflect the site operations. Specifically, a snack program has been operated and claimed through SFSP. NSLP site applications have not been updated to reflect program participating in At-Risk snack.                    | Advised SFA to update site application in CNPWeb and contact their assigned specialist to let them know of the changes.   | <i>New site applications were submitted and approved in CNPWeb. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i>     |

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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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Not Applicable

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

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| 17 | Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast and lunch. | Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> 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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**Resource Management**

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| 18 | 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>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> |
| 19 | Compliance with the revenue from nonprogram food requirements via either the Nonprogram Food Revenue Tool or 5-Day Reference Period as described in FNS Policy Memo SP 20-2016 was not assessed.   | 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.   | <i>Please complete and submit either the USDA Nonprogram Food Revenue Tool or 5-Day Reference Period as evidence of compliance with revenue from nonprogram food requirements.</i>   |

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| 20 | Indirect cost charges were reported on the Annual Financial Report, however, sufficient documentation was not provided to support the indirect costs charged to the nonprofit school food service account. In order for costs to be allowable they must be adequately documented as required in 2 CFR 200.403(g). | Discussed cost allowability requirements for federal awards and that all costs charged to a federal award must be adequately documented. Referred to 2 CFR 200.403(g). Reviewed requirements that indirect costs be charged consistently across the SFA as required in 2 CFR 200.412-414. Referred to the USDA's Indirect Cost Guidance Manual located at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals tab, which can be used as a resource when determining allowable indirect costs. | <i>Please provide written procedures that will be implemented to ensure all indirect costs charged to the nonprofit school foodservice account and any necessary supporting documentation are adequately documented and kept on file.</i> |
| 21 | The Annual Financial Report was completed inaccurately. Specifically, the operating months were not reported and food expenditures were recorded in "Other Expenditures" rather than "Other Food".  | Reviewed and discussed errors with Food Service Director. Suggested routing AFR to a second designated official for review prior to submission.  | <i>Please describe the steps that will be taken to ensure that the AFR is completed accurately.</i>   |

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**General Program Compliance: Civil Rights**

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| 22 | 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. For SY 2021-2022, schools participating in SSO should notify households that meals will be offered free through SSO. Referred to HNS 17-2021 & SP 15-2021 (Q10). Additionally, referred to the template release that can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Outreach tab. | <i>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.</i> |
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| <p>23 Sufficient documentation to support accommodations for special diets has not been maintained. Specifically, there is no form made available to accommodate students with dietary needs that diverge from meal pattern requirements.</p> | <p>Discussed requirements for accommodating special diets and the need for sufficient documentation. Referred to Medical Statement for Students with Special Dietary Accommodations found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational tab. Additionally, referred to Accommodating Children with Disabilities in the School Meal Program found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab.</p> | <p><i>Please provide written procedures for maintaining documentation supporting accommodations for special diets and written assurance that sufficient documentation to support accommodations for special diets will be maintained. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete the Medical Statement for Students with Special Dietary Accommodations must be submitted.</i></p> |
| <p>24 Program staff have not been trained on civil rights topics.</p>   | <p>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 <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a>.</p>  | <p><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></p>  |
| <p>25 The Civil Rights Compliance form is not being completed every year by December 15 and kept on file.</p>   | <p>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 <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a>. The Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab.</p>   | <p><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></p>                                       |



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**General Program Compliance: SFA On-Site Monitoring**

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| 26 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> 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>                                 |
| 27 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> 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> |

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**General Program Compliance: Local Wellness Policy**

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| 28 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> 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> |
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| <p>29 The Local Wellness Policy (LWP) did not contain goals for nutrition education.</p>  | <p>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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Tab.</p>   | <p><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></p> |
| <p>30 The Local Wellness Policy (LWP) did not contain goals for physical activity.</p>  | <p>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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Tab.</p>  | <p><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></p> |
| <p>31 The Local Wellness Policy (LWP) did not contain goals for other school-based activities.</p>  | <p>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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Tab.</p> | <p><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></p> |
| <p>32 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.</p> | <p>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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Tab.</p>  | <p><i>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.</i></p>   |

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| 33 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> 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> |
| 34 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 <a href="http://www.teamnutrition.usda.gov/">http://www.teamnutrition.usda.gov/</a> . The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Tab. | <i>None required at this time.</i>  |
| 35 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Tab.   | <i>None required at this time.</i>  |

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| 36 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> 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> |
| 37 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Tab.  | <i>None required at this time.</i>  |
| 38 The review and update of the Local Wellness Policy (LWP), as specified in the policy itself, is not occurring nor is documentation being kept on file to support this. | Discussed why the review and update is not occurring and what can be done to ensure this occurs as specified in the LWP. Discussed maintaining records to document compliance. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Tab. | <i>None required at this time.</i>  |
| 39 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Tab.   | <i>None required at this time.</i>  |

40 The required stakeholders are not being permitted to be involved in the review and update of the Local Wellness Policy (LWP).	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 <a href="https://www.theicn.org/cnss/community-connection/assembling-the-team/">https://www.theicn.org/cnss/community-connection/assembling-the-team/</a> . The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Tab.	<i>None required at this time.</i>
41 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Tab.	<i>None required at this time.</i>
42 The SFA did not opt into the Nationwide Waiver of Local School Wellness Policy Triennial Assessments in the National School Lunch and School Breakfast Programs.	Discussed updating the NSLP Sponsor application to indicate participating in the Nationwide Waiver of Local School Wellness Policy Triennial Assessments in the National School Lunch and School Breakfast Programs. Referred to HNS 13-2021 Applications for School Food Authorities Serving Meals During School Year 2021-2022.	<i>Please submit an updated NSLP Sponsor application indicating participation in the of Local School Wellness Policy Triennial Assessments in the National School Lunch and School Breakfast Programs. Additionally, provide written assurance that you follow-up with your assigned HNS Specialist.</i>

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**General Program Compliance: Competitive Food Services**

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No Findings

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**General Program Compliance: Professional Standards**

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| 43 | Although the new director hiring form was completed, the supporting documentation to support that the School Nutrition Program Director hired after July 1, 2015 met the hiring standard requirement was not received. | Referred to hiring standard requirements and discussed with appropriate district HR/school staff. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Courses tab. | <i>Please provide the completed Director Hiring Form with supporting documentation. Additionally, please provide written assurance that this documentation will be maintained on file.</i> |
| 44 | 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 <a href="https://theicn.org/icn-resources-a-z/food-safety/">https://theicn.org/icn-resources-a-z/food-safety/</a> .  | <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**

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No Findings

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

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| 45 | The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools or at off-site storage facilities: pineapple chunks #10 can (Thailand), mandarin oranges #10 can (China), Dole fruit cups (China, Philippines, Thailand). 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational tab. Buy American Recorded Webinar and FAQ can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab. | <i>Please provide a written description of the changes that have been made to procurement and recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i>   |
| 46 | The written food safety plan did not include adequate SOPs for returning unopened food items to storage. Additionally, the food safety plan included SOPs that were not applicable to the food service operations (BIC, FFVP).   | 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Food/Health Safety tab.   | <i>Please provide a copy of the SOPs added for returning unopened food items to storage. Additionally, please provide written assurance that the food safety plan will be updated to reflect current food service operations in the future.</i> |

47 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 each site operating must obtain two food safety 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 each school year.</i>
48 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>
49 Temperature logs for food storage areas are not being maintained. Specifically, temperatures were not being recorded for the milk cooler.	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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Food/Health Safety tab. Additionally, discussed Food Safety Online Courses can be found on ICN's website at <a href="https://theicn.org/icn-resources-a-z/food-safety/">https://theicn.org/icn-resources-a-z/food-safety/</a> .	<i>Please provide a copy of the temperature log that will be used for food storage areas as well as written assurance that logs will be kept daily and maintained on-file for 6 months.</i>
50 Storage violations were observed. Specifically, a dented can was found in the dry food storage area.	Discussed specific violations and feasible solutions. Referred to Arizona's School Food Safety Guidance found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Food/Health Safety tab. Additionally, discussed Food Safety Online Courses can be found on ICN's website at <a href="https://theicn.org/icn-resources-a-z/food-safety/">https://theicn.org/icn-resources-a-z/food-safety/</a> .	<i>Technical assistance was provided during the on-site review and the dented can was removed. No further corrective action is required.</i>

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**General Program Compliance: Reporting & Recordkeeping**

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51 The CNPWeb site application for Peach Springs School did not accurately report the grades served at the site. Specifically, grades 9-12 are served, however, they were not selected on the application.	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 grades served at Peach Springs School. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i>
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<p>52 Production records for breakfast and lunch provided did not contain all required sections: Specifically, production records used/left over section is not completed adequately. Additionally, milk should be recorded separately for each variety.</p>	<p>Discussed required sections of production records. Production Record Templates can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning tab. The Production Record Overview Recorded Webinar &amp; Webinar Slides can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab.</p>	<p><i>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.</i></p>
<p>53 Production record crediting information was not accurate for the following items: whole wheat tortillas (2/10/22 breakfast), applesauce (2/7/22 lunch), baked chicken (2/8/22 lunch), mashed potatoes (2/8/22 lunch), taquitos (2/9/22 lunch), marinara sauce (2/10/22)</p>	<p>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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning tab.</p>	<p><i>Please provide updated production records with accurate crediting information.</i></p>
<p>54 A standardized recipe was not provided for the goulash (served at lunch on 2/7).</p>	<p>Discussed all menu items that contain more than 1 ingredient must 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning tab.</p>	<p><i>Please provide an updated recipe for goulash. Additionally, please provide written assurance that all menu items that contain more than 1 ingredient will have a standardized recipe.</i></p>

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

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<p>55 Outreach to families regarding the availability of the School Breakfast Program (SBP) was not conducted at the beginning of or during the school year.</p>	<p>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.</p>	<p><i>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.</i></p>
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56 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 <a href="https://www.azhealthzone.org/">https://www.azhealthzone.org/</a> .	<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**

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Not applicable

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**Other Federal Program Reviews: Seamless Summer Option**

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Will be reviewed in Summer 2022 if applicable.

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**Other Federal Program Reviews: Fresh Fruit & Vegetable Program**

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Not applicable

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**Other Federal Program Reviews: Special Milk Program**

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Not applicable

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**Other Federal Program Reviews: At-Risk Afterschool Meals**

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57 Adequate point of service snacks counts are not being maintained.	Discussed that point of service snack counts must demonstrate when a reimbursable snack has been served to a student and the type of counting system that would be appropriate based on snack reimbursement eligibility.	<i>Please provide a written description of the system that will be implemented to ensure accurate snack counts are maintained for each service.</i>
58 At-Risk Afterschool Meals production records are not being completed daily and maintained for 5 years, as is required.	Discussed record keeping requirements. A sample production record can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning tab.	<i>Please provide copies of completed At-Risk Afterschool Meals production records for 5 consecutive days. Additionally, please provide written assurance that all records will be maintained for 5 years.</i>
59 The At-Risk Afterschool Meals Site Review Form for Snacks was not completed by February 1st.	Discussed SFAs are required to perform no less than one on-site snack meal service review of the At-Risk Afterschool Meals site by February 1st. The At-Risk Afterschool Meals Site Review Form for Meals <a href="https://www.azed.gov/hns/afterschool/programforms">https://www.azed.gov/hns/afterschool/programforms</a> under the Operational tab.	<i>Please provide a completed At-Risk Afterschool Meals Site Review Form for Snacks. Additionally, please provide a written description of the process that has been put in place to ensure that all sites operating At-Risk Afterschool Snacks will receive a review prior to February 1 annually.</i>

60 Acceptable education or enrichment activities were not made available while At-Risk Afterschool Meals are being offered.

Discussed an educational or enrichment activity must be available while meals are being offered. These programs must be regularly scheduled, organized, and supervised by the entity that is sponsoring the program. These educational or enrichment activities must be open to all children up to the age of 18. Additionally, discussed children who are receiving meals are not required to participate in these activities, but the activities need to be available to all. Online Course: Operating At-Risk Afterschool Meals for School Food Authorities can be found on ADE's at <https://www.azed.gov/hns/afterschool/rainingforSFAs> under the Online Course tab.

*Please provide a written description of the changes that have been made to the education or enrichment activities made available while At-Risk Afterschool Meals are being offered.*

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Comments/Recommendations:

Congratulations - Peach Springs Unified District has completed the Administrative Review for the 2021-2022 school year! Thank you for your hospitality during the on-site visit. Your team's care for the students was clearly apparent!

**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.**

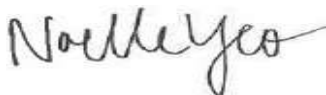
**Training: In-person classes, web-based training and How-To guides can be found on ADE's website at <https://www.azed.gov/hns/nslp/training>.**

Fiscal Action Assessed?

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|---------------------------------------|---|------------|
| <input type="checkbox"/> No- SBP      | <input checked="" type="checkbox"/> Yes- SBP      | \$583.52   |
| <input type="checkbox"/> No- NSLP     | <input checked="" type="checkbox"/> Yes- NSLP     | \$2,139.00 |
| <input type="checkbox"/> No- SSO SBP  | <input checked="" type="checkbox"/> Yes- SSO SBP  | \$226.00   |
| <input type="checkbox"/> No- SSO NSLP | <input checked="" type="checkbox"/> Yes- SSO NSLP | \$360.00   |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by July 8, 2022 to Noelle Yeo at [Noelle.Yeo@azed.gov](mailto:Noelle.Yeo@azed.gov).



6/1/2022

Reviewer Signature

Date

Kerrie Zigler

Digitally signed by Kerrie Zigler  
Date: 2022.06.01 14:29:52  
-07'00'

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.

Equity for all students to achieve their full potential  
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This institution is an equal opportunity provider