



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

**Administrative Review Summary Report**

School Food Authority Name: Red Mesa Unified District

CTD: 01-02-27

Site(s): Red Mesa Elementary School

Contacts: Amy Fuller, Interim Superintendent; Kirby Bedonie, Business Manager; Charlotte Lee, Food Service Director

Review Date: April 20, 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 service lines observed on the day of review did not provide an accurate count at the point of service. Specifically, tray counting was used to determine the meal count due to staff shortage on this day. This was determined to be a non-systemic issue and did not contribute towards fiscal action calculations.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. Discussed with staff how to properly identify and count reimbursable meals, as well as counting based on eligibility category.	<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**

2	Fluid milk was not available in at least two varieties at breakfast. Specifically, only 1% white milk was made available for the first 15 meals served at breakfast. This was not a repeat finding from previous cycle and did not contribute toward fiscal action calculations.	Discussed variety requirement and feasible options for compliance. Allowable milk varieties are fat-free unflavored, fat-free flavored and 1% unflavored. Please note that repeated violations involving milk requirements may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).	<i>Please provide one week of breakfast production records that demonstrate that fluid milk was available in at least two varieties. Additionally, please provide written assurance that fluid milk will always be available in at least two varieties at breakfast.</i>
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| 3 | Fluid milk was not available in at least two varieties at breakfast during the review period. Specifically, only 1% white milk was made available during breakfast on March 7-10, 2022. This was not determined to be a repeat finding from previous cycle and did not contribute toward fiscal action calculations.   | Discussed variety requirement and feasible options for compliance. Allowable milk varieties are fat-free unflavored, fat-free flavored and 1% unflavored. Please note that repeated violations involving milk requirements may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).  | <i>Please provide one week of breakfast production records that demonstrate that fluid milk was available in at least two varieties. Additionally, please provide written assurance that fluid milk will always be available in at least two varieties at breakfast.</i>   |
| 4 | The following menu item could not be credited towards the meal pattern due to insufficient documentation: BBQ shredded pork. Without sufficient documentation, the reviewer was unable to determine if the daily and weekly meat/meat alternate quantity requirements were met during the week of review. This was determined to be a repeat finding from previous cycle and contributed towards fiscal action calculations. | Discussed requirements regarding processed product documentation and provided examples. USDA Food Fact Sheets can be found on USDA's website at <a href="http://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets/">http://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets/</a> . The CN Labels and Product Formulation Statements Recorded Webinar & Webinar Slides 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). | <i>Please provide a recipe along with supporting documentation for all ingredients (Child Nutrition (CN) label and/or Product Formulation Statement (PFS)). If unable to provide the documentation, please provide written assurance that this menu item will no longer be offered/served to students. Additionally, please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation. Additionally, the certificate of completion of CN Labels and Product Formulation Statements must be provided.</i> |

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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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| 5 | The Free and Reduced-Price Policy Statement provided by the SFA does not reflect current practices and procedures observed on-site. Specifically, it has not been updated to reflect the new food service supervisor. | 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> |
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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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No findings

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

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No findings

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**Resource Management**

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| 6 | 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> |
| 7 | A plan for spending the 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 <a href="https://www.azed.gov/hns/memos">https://www.azed.gov/hns/memos</a> . | <i>Please provide a written plan for spending the emergency operational costs funds.</i>   |

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**General Program Compliance: Civil Rights**

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| 8 | 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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**General Program Compliance: SFA On-Site Monitoring**

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No findings

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**General Program Compliance: Local Wellness Policy**

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| 9  | 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> |
| 10 | 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> |
| 11 | 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> |

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| 12 | 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> |
| 13 | 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> |

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**General Program Compliance: Competitive Food Services**

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| 14 | The school fundraisers were not being tracked to ensure compliance with HNS 20-2019: Revision to Arizona Department of Education Policy on Specially Exempted Fundraisers. | HNS 20-2019: Revision to Arizona Department of Education Policy on Specially Exempted Fundraisers that can be found on ADE's website at <a href="https://www.azed.gov/hns/memos">https://www.azed.gov/hns/memos</a> . The Online Course: Smart Snacks and Competitive Foods Standards in Arizona 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 written assurance that fundraisers will be in compliance with HNS 20-2019 Revision to Arizona Department of Education Policy on Specially Exempted Fundraisers. Additionally, the certificate of completion of Online Course: Smart Snacks and Competitive Foods Standards in Arizona must be submitted.</i> |
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**General Program Compliance: Professional Standards**

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| 15 | 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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| 16 | The written food safety plan did not include adequate SOPs for Critical Control Points for keeping food at safe temperatures. Additionally, the food safety plan was not site specific and did not include SOPs for serving the Afterschool Snack Program and At-Risk 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 <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 and CCPs found in the written food safety plan.</i>  |
| 17 | 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> |
| 18 | Temperature logs for food storage areas are not being maintained. Specifically, the temperature of the milk cooler was not regularly recorded.   | 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>   |

<p>19 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: tropical fruit salad (Thailand), tomatoes (Mexico), mandarin oranges (China), suncup juices (Brazil, Argentina, Chile, New Zealand). Additionally, documentation justifying a Buy American exception was not maintained/on file.</p>	<p>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.</p>	<p><i>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.</i></p>
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**General Program Compliance: Reporting & Recordkeeping**

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<p>20 The Annual Financial Report was completed inaccurately. Specifically, the number of operating months was not reported.</p>	<p>Reviewed and discussed errors with Food Service Director. Suggested routing AFR to a second designated official for review prior to submission.</p>	<p><i>Please describe the steps that will be taken to ensure that the AFR is completed accurately.</i></p>
<p>21 Production record crediting information was not accurate for the following menu items during the review period:  3/7 - sausage patty (1) credits as 0.75 oz eq MMA, not 1 oz eq MMA  3/7 - sliced turkey (2 slices) credit for 1.25 MMA, not 2.0 oz eq MMA  3/7 - shredded lettuce credits 5/8 cup, not 1/4 cup  3/7 &amp; 3/8 - sliced tomato credits as 1/8 cup red/orange vegetable, not 1/4 cup  3/7 - baked chips do not credit towards the grain component  3/8 - hash browns credit 1/2 cup starchy vegetable (not recorded)  3/9 - granola credits 2.0 oz eq grain (not recorded)  3/9 - WG tortilla credits as 1.5 oz eq grain, not 1.0 oz eq grain  3/10 - sausage links (2) credit as 1.25 oz MMA, not 1 oz MMA</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.</i></p>

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

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22 Outreach to families regarding the availability of the School Breakfast Program (SBP) was not 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.*

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**Other Federal Program Reviews: Afterschool Snack Program**

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No findings

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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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Not applicable

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**Comments/Recommendations:**

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Congratulations on completing the Administrative Review for SY 2021-2022. Thank you for your hard work during the review process. Keep up the good work!

**To stay on track with NSLP requirements, check out the NSLP at a Glance Calendar & Monthly Checklist on our website at <https://www.azed.gov/hns/nslp/forms> under the Calendars and Checklists tab.**

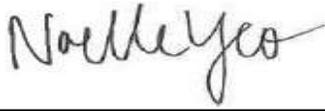
**Training: In-person classes, web-based training and How-To guides can be found on ADE's website at <https://www.azed.gov/hns/nslp/training>.**

**Fiscal Action Assessed?**

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|---|--|
| <input checked="" type="checkbox"/> No- SBP     | <input type="checkbox"/> Yes- SBP                          |
| <input type="checkbox"/> No- NSLP               | <input checked="" type="checkbox"/> Yes- NSLP \$1,003.75   |
| <input checked="" type="checkbox"/> No- SSO SBP | <input type="checkbox"/> Yes- SSO SBP                      |
| <input type="checkbox"/> No- SSO NSLP           | <input checked="" type="checkbox"/> Yes- SSO NSLP \$291.60 |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by June 30, 2022 to Noelle Yeo at Noelle.Yeo@azed.gov.



5/31/2022

Reviewer Signature

Date

Kerrie Zigler

Digitally signed by Kerrie  
Zigler  
Date: 2022.05.31 08:51:31  
-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.

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