

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

# **Administrative Review Summary Report**

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School Food Authority Name: Rock Point Com	munity School				
CTD: 01-39-04					
Site(s): Rock Point Community School, Rock F	oint Communi	ty School - Bus Rout	e 9 RPCS Campus Housing		
Contacts: Deana Dugi, CEO; Alvina Tom, Foo	d Service Work	er			
Review Date: April 26, 2022					
Review Period: March 2022					
Programs Reviewed:   National S	School Lunch	✓ School Breakfast	✓ Afterschool Snack		
Fresh Fruit & \	Vegetable	Special Milk	At-Risk Afterschool Meals		
No. Review Observations & Findings	Technical As	sistance Provided	Required Corrective Action		
Performance Stand	dard 1: Certificat	tion & Benefit Issuan	ce - Critical Area		
Not Applicable					
Performance Standard 1: Meal Counting & Claiming - Critical Area					
Meal count totals for the month of review	Discussed how of	current system	Please provide a written description of		
	allowed for this t		changes to the system that have been		
		s that could be made	implemented to ensure that meal service lines		
Community School. This was deemed a non-	to ensure it does	n't continue.	provide an accurate count by eligibility		
systemic error and contributed toward fiscal			category.		
action calculations.					

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

2 Portion sizes observed for Rock Point Community School during the month of review did not meet minimum amounts required by the breakfast meal pattern. Specifically, 4/8/2022, baked french toast crediting as 0.5 ounce equivalents of grain (bread) and 1 ounce equivalents of meat/meat alternate (egg). Meat/meat alternates may not be counted toward the grain component until after the minimum daily grains requirement (1.0 ounce equivalents) is offered.

Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (i.e., offering a grain that credits as at least 1.0 ounce equivalent). 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.

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.

- 3 According to the production records, fluid milk was not available in at least two varieties at lunch at Rock Point Community School - Bus Route 9 RPCS Campus Housing during the review period. This was determined not to be a repeat finding from previous cycle and did not contribute toward fiscal action calculations.
- 4 According to the production records, fluid milk was not available in at least two varieties at breakfast and lunch at Rock Point Community School during the review period. This was determined not to be a repeat finding from previous cycle and did not contribute toward fiscal action calculations.
- 5 Quantities observed during the review period Discussed how current system did not meet minimum amounts required by the meal pattern at lunch. Specifically, 1/2 cup vegetable was served at Rock Point Community School (K-8) on 4/5/22 which did not meet the minimum daily requirement of 3/4 cup. This was determined to be a repeat finding from previous cycle and contributed 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).

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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 http://www.azed.gov/hns/nslp under the Meal Pattern tab. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website http://www.azed.gov/hns/nslp/training 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).

Please provide written assurance that fluid milk will always be available in at least two varieties at breakfast.

Please provide written assurance that fluid milk will always be available in at least two varieties at breakfast.

Please provide a written description of the changes that have been made to ensure that vegetable quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu

6 Quantities observed during the review period Discussed how current system did not meet minimum amounts required by the meal pattern at lunch. Specifically, on two days during the review period 1/2 cup fruit was served at Rock Point Community School (9-12) which did not meet the minimum daily requirement of 1 cup. This was determined to be a repeat finding from previous cycle and contributed toward fiscal action calculations.

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(extra 7 cents).

Please provide a written description of the changes that have been made to ensure that daily fruit quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu

7 Quantities observed during the review period Discussed how current system did not meet minimum amounts required by the meal pattern at lunch. Specifically, the weekly minimum fruit quantity requirement was not met at Rock Point Community School (9-12). This was determined to be a repeat finding from previous cycle and contributed toward fiscal action calculations.

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Please provide a written description of the changes that have been made to ensure that weekly fruit quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu

8 Quantities observed during the review period Discussed how current system did not meet minimum amounts required by the meal pattern at lunch. Specifically, on two days during the review period, the daily minimum grain quantity requirement was not met at Rock Point Community School (9-12). This was determined to be a repeat finding from previous cycle and contributed toward fiscal action calculations.

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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. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu

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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. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu

# 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

No findings

Meal Access & Reimbursement: Meal Counting & Claiming

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

Not applicable

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

10 Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast nor lunch.

and posting. Printable POS Signage can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab.

Discussed feasible options for signage Please provide the sign that will be displayed and potential content, plan for creating 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

#### **Resource Management**

- 11 For school year 2020-2021, the annual financial report was not updated to reflect that the deficit of the nonprofit school food service account was covered by a transfer from the general fund.
- 12 Meals served to teachers, administrators, so that the adult payment in combination with cost analysis or pricing adult meals to 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.

The business manager provided a letter explaining the failure to properly document the transfer of ISEP funding.

Discussed ways to determine adult reflect the amount of reimbursement received for a free meal plus the per meal value of entitlement and bonus Referred to HNS 27-2021 Guidance for Adult Meal Pricing in School Year 2021-2022 (SY 22).

Please provide written assurance that nonfederal funds are used to cover excess expenses in the food service account.

Please provide a written description of the custodians, and other adults were not priced meal prices which included a per meal 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 commodities for non-pricing programs. been increased to the appropriate level.

#### **General Program Compliance: Civil Rights**

- 13 The USDA nondiscrimination statement was not printed on appropriate program materials. Specifically, breakfast outreach materials and summer outreach materials do https://www.azed.gov/hns/civilrights not include the USDA nondiscrimination statement.
- 14 The public/media release was not provided to local media, the unemployment office and local employers considering large layoffs.

Discussed where to find website at and whether long or short statement would be most appropriate.

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

https://www.azed.gov/hns/nslp/forms under the Outreach tab.

Please provide an updated program material nondiscrimination statement on ADE's with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.

> 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.

15 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.

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 https://www.azed.gov/hns/nslp/forms under the Operational tab. Additionally, referred to Accommodating Children with Disabilities in the School Meal Program found on ADE's website at https://www.azed.gov/hns/nslp 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 https://www.azed.gov/hns/nslp/training

under the Online Training Library tab.

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.

16 Civil Rights training provided to staff did not cover all required training subjects. Specifically, documentation indicated that only the ADE "How to File a Civil Rights Complaint" training was completed.

Discussed the following subjects must be covered: Collection and Use of Data, Effective Public Notification Systems, Complaint Procedures, Compliance Review Techniques, Resolution of Noncompliance, Requirements for Reasonable Accommodations of Persons with Disabilities, Requirements for Language Assistance, Conflict Resolution, and Customer Service. An acceptable civil rights power point training material can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library tab.

Discussed the following subjects must be covered: Collection and Use of Data, Effective Public Notification Systems, Compliant Procedures, Compliance Review Techniques, Resolution of Noncompliance, Requirements for Reasonable 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.

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

17 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.

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.

18 On-site reviews of the breakfast meal counting and claiming procedures for 50% of find a template Internal On-Site the sites within the SFA are not being conducted each year prior to February 1.

Discussed requirement and where to 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.

Please provide a completed Internal On-Site Monitoring Form of the Meal Counting and Monitoring Form-Breakfast of the Meal 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 onsite review of the meal counting and claiming procedures each year prior to February 1.

# **General Program Compliance: Local Wellness Policy**

19 The public is not being notified of the existence and contents of the Local Wellness Policy (LWP).

Discussed feasible means of notifying None required at this time. the public about the LWP. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Tab.

### **General Program Compliance: Competitive Food Services**

No findings

#### **General Program Compliance: Professional Standards**

20 The School Nutrition Program Director hired after July 1, 2015 did not complete the required 8 hours of food safety training within training within current school year. 30 days of being hired or within 5 years prior Food Safety Online Courses can be to hire date. Specifically, only 4 hours of food safety training was completed.

Discussed requirement and feasibility for attending an available certification found on ICN's website at https://theicn.org/icn-resources-az/food-safety/.

Please provide the expected date that food safety certification training will be completed by the School Nutrition Program Director.

# **General Program Compliance: Water**

No findings

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

21 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: green chiles (Mexico), watermelon (Mexico), Suncup juices, Bell peppers (Mexico), mandarin oranges (China), and Del Monte fruit cup (Chile, Bulgaria). Additionally, documentation justifying a Buy American exception was not maintained/on file.

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.

Discussed the Buy American provision 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.

22 The written food safety plan did not include accurate site information and included SOPs that do not apply to the meal service operations at this site.

Discussed sample SOPs and guidelines for Critical Control Points (CCPs) found in USDA's Guidance on creating a Food Safety can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Food/Health Safety tab.

Please provide a copy of the updated food safety plan with accurate site information.

23 The most recent food safety inspection report was not posted in a prominent location recent report and feasible places for and was not visible to all program participants.

Discussed making copies of most posting.

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.

24 Temperature logs for food storage areas are not being maintained. Specifically, temperature logs were not maintained for the temperature logs, sample templates, dry food storage area.

Discussed requirements for maintaining food storage area and who would be responsible. Temperature logs for food storage areas must be maintained for 6 months. Monitoring forms can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Food/Health Safety tab. Additionally, discussed Food Safety Online Courses can be found on ICN's website at https://theicn.org/icnresources-a-z/food-safety/.

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.

#### General Program Compliance: Reporting & Recordkeeping

Discussed required sections of

25 Production records for breakfast and lunch did not contain all required sections. Specifically, production records did not indicate that two varieties of milk were available at breakfast and lunch.

production records. Production Record and lunch production records for 5 Templates can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab. The **Production Record Overview** Recorded Webinar & Webinar Slides can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library tab.

Please provide copies of completed breakfast 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.

26 Production records for breakfast and lunch did not contain all required sections. Specifically, crediting information for the menu items served was consistently inaccurate and incomplete.

Discussed required sections of production records. Production Record and lunch production records for 5 Templates can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab. The **Production Record Overview** Recorded Webinar & Webinar Slides can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library tab.

Please provide copies of completed breakfast 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.

27 Meal contribution crediting is not accurate for Discussed updating recipes to reflect all recipes. Specifically, baked french toast credits as 0.5 oz eq grain and 1 oz eq meat/meat alternate, not 1 oz eq grain and 1 oz eg meat/meat alternate.

current products being used.

Please provide an updated recipe for baked french toast.

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

No findings

#### Other Federal Program Reviews: Afterschool Snack Program

- 28 Production records do not support that the Afterschool Snack Program (ASP) meal pattern was met on the following date: 4/21/2022. Specifically, a rice krispy granola bar was served which did not provide 1 oz eq https://www.azed.gov/hns/afterschool grain.
- 29 The Afterschool Snack Program (ASP) monitoring review was not conducted within the first four weeks of operation and one additional time during the school year.

Discussed the meal pattern requirements of the ASP. The ASP meal pattern table can be found on ADE's website at under the Meal Pattern tab. Discussed ASP monitoring requirements. A sample ASP monitoring form can be found on ADE's website at https://www.azed.gov/hns/nslp/forms

Please provide written assurance that the ASP meal pattern will be adhered to at all times.

Please provide written assurance that the ASP will be monitored once within the first four weeks of operation and one additional time during the school year, and that documentation to support this will be maintained.

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

under the Operational tab.

Will be reviewed in Summer 2022 if applicable.

N	Other Federal Program Reviews: Fres	in Fruit & Vegetable Program
Not applicable		
	Other Federal Brazzan Beriaus	. Consid Mills Description
Not applicable	Other Federal Program Reviews	: Special Milk Program
Not applicable		
	Other Federal Program Reviews: A	At-Risk Afterschool Meals
Not applicable		
• •		
Comments/Recommenda	ations:	
Congratulations - Rock P	oint Community School has complete	d the Administrative Review for SY21-22. Thank you fo
your hard work during the	e review process. Your dedication to s	erving your students healthy, safe meals is admirable!
To otov on trook with N	SLD requirements, shock out the M	CLD at a Clange Colondar & Monthly Checklist on a
=	-	
_	SLP requirements, check out the Nazed.gov/hns/nslp/forms under the Cal	
website at https://www.a	zed.gov/hns/nslp/forms under the Cal	endars and Checklists tab.
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website at https://www.a  Training: In-person class https://www.azed.gov/hns  Fiscal Action Assessed?  No- SBP  No- NSLP  No- SSO SBP  No- SSO NSLE  Fiscal Action under \$600  Please submit corrective	zed.gov/hns/nslp/forms under the Calsses, web-based training and How-s/nslp/training.  ☐ Yes- SBP \$403.78 ☐ Yes- NSLP \$2,431.81 ☐ Yes- SSO SBP \$0 ☐ Yes- SSO NSLP\$0 will be disregarded.	endars and Checklists tab.  To guides can be found on ADE's website at  loelle Yeo at Noelle.Yeo@azed.gov.
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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 www.azed.gov – (602) 542-8700 – 1535 West Jefferson Street • Phoenix, Arizona 85007 Bin # 7

This institution is an equal opportunity provider