



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

Administrative Review Summary Report

School Food Authority Name: Rough Rock School Board, Inc.

CTD: 01-40-01

Site(s): Rough Rock Elementary School

Contacts: Timothy Benally, Superintendent ; Crystal Wheeler, Lead Cook ; Jimmie Begay, Support 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
Performance Standard 1: Certification & Benefit Issuance - Critical Area			
	Not Applicable		

Performance Standard 1: Meal Counting & Claiming - Critical Area			
	No Findings		

Performance Standard 2: Meal Components & Quantities - Critical Area			
1	Fluid milk was not available in at least two varieties at breakfast during one day of the review period. This was determined to be a repeat finding attributed to supply chain disruptions and therefore did not contribute toward fiscal action calculations per USDA's COVID-19: Child Nutrition Response #100.	Referred to HNS 31-2021 Waiver Guidance for Operating the Summer Food Service Program during Unanticipated School Closures in School Year 2021-2022 and HNS 30-2021 Guidance on the Use of the School Year 2021-2022 Meal Pattern Waiver found on ADE's website at https://www.azed.gov/hns/memos . Additionally, discussed HNS has released a webform for all Child Nutrition Program operators to report any food supply disruptions. Food supply disruptions are challenges in purchasing and receiving food or supplies through normal channels, unanticipated cancellation of food and supply contracts, lack of availability of certain foods or supplies, unexpected substitution of food products, and increased food and supply prices. Reporting Food Supply Disruptions webform can be found on ADE's website at https://www.azed.gov/hns/covid19 under the Reporting Food Supply Disruptions accordion.	<i>Please provide the steps that will be taken to ensure documentation supporting supply chain disruptions is maintained. Additionally, provide written assurance that this documentation will be kept on file for a minimum of five years.</i>

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| <p>2 Beans/Peas and Starchy Vegetable subgroups were not offered during the week of review. This is not a repeat finding and did not contribute toward fiscal action calculations.</p> | <p>Discussed vegetable subgroup requirements for the age/grade groups served. Vegetable Subgroup Quick Guide can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library tab. Please note that repeated violations involving vegetable subgroups may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Please provide written assurance that moving forward, all menus will be planned to meet the vegetable subgroup requirements. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.</i></p> |
| <p>3 Quantities observed for lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, the daily minimum vegetable portion of 3/4 cup was not met on Day 2 of the review period. This was determined to be a repeat finding attributed to supply chain disruptions and therefore did not contribute toward fiscal action calculations per USDA's COVID-19: Child Nutrition Response #100.</p> | <p>Referred to HNS 31-2021 Waiver Guidance for Operating the Summer Food Service Program during Unanticipated School Closures in School Year 2021-2022 and HNS 30-2021 Guidance on the Use of the School Year 2021-2022 Meal Pattern Waiver found on ADE's website at https://www.azed.gov/hns/memos. Additionally, discussed HNS has released a webform for all Child Nutrition Program operators to report any food supply disruptions. Food supply disruptions are challenges in purchasing and receiving food or supplies through normal channels, unanticipated cancellation of food and supply contracts, lack of availability of certain foods or supplies, unexpected substitution of food products, and increased food and supply prices. Reporting Food Supply Disruptions webform can be found on ADE's website at https://www.azed.gov/hns/covid19 under the Reporting Food Supply Disruptions accordion.</p> | <p><i>Please provide the steps that will be taken to ensure documentation supporting supply chain disruptions is maintained. Additionally, provide written assurance that this documentation will be kept on file for a minimum of five years.</i></p> |

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

No Findings

Meal Access & Reimbursement: Certification & Benefit Issuance

Not Applicable

Meal Access & Reimbursement: Verification

Not Applicable

Meal Access & Reimbursement: Meal Counting & Claiming

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| 4 | The SFSP site application in CNPWeb do not accurately reflect current practices. Specifically, Adult meal prices for lunch are inaccurate and are below what is actually being charged to participating adults. | Advised SFA to update site applications in CNPWeb and contact their assigned specialist to let them know of the changes. | <i>Please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i> |
| 5 | The NSLP site applications in CNPWeb do not accurately reflect current practices. Specifically, Pre-K students are not participating in NSLP or SBP. | Advised SFA to update site applications in CNPWeb and contact their assigned specialist to let them know of the changes. | <i>Please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i> |
| 6 | The NSLP and SFSP site applications in CNPWeb do not accurately reflect current practices. Specifically, Rough Rock Elementary School operates a 4-day week, not a 5-day week. | Advised SFA to update site applications in CNPWeb and contact their assigned specialist to let them know of the changes. | <i>Please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i> |
| 7 | The NSLP site applications in CNPWeb do not accurately reflect current practices. Specifically, NSLP meal pattern is indicated for At-Risk Supper, however, CACFP meal pattern is implemented. | Advised SFA to update site applications in CNPWeb and contact their assigned specialist to let them know of the changes. | <i>Please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i> |

Meal Pattern & Nutritional Quality: Offer Versus Serve

No Findings

Meal Pattern & Nutritional Quality: Meal Components & Quantities

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| 8 | 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 https://www.azed.gov/hns/nsfp/forms 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

No Findings

General Program Compliance: Civil Rights

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| 9 | The USDA nondiscrimination statement was not printed on the menu advertised for breakfast and lunch. | Discussed where to find nondiscrimination statement on ADE's website at https://www.azed.gov/hns/civilrights and whether long or short statement would be most appropriate. | <i>Please provide an updated menu with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i> |
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10 The "And Justice for All" poster was not displayed in a prominent location and was not visible to all program participants.	Discussed requirements of where poster must be placed and where to find a printable "And Justice For All" poster on ADE's website at https://www.azed.gov/hns/civilrights . Referred to HNS 08-2019 USDA Nondiscrimination And Justice for All Poster Clarification.	<i>The SFA corrected the finding on site. No further corrective action is required.</i>
11 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 https://www.azed.gov/hns/nslp/forms 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>
12 All program staff have not been trained on civil rights topics.	Discussed requirement and how to document that requirement has been met. An acceptable civil rights power point training material can be found on ADE's website at https://www.azed.gov/hns/civilrights .	<i>Please provide written assurance that all food service staff will be trained at hire and as needed on Civil Rights Compliance in Child Nutrition Programs. Describe the process that will be implemented to ensure that this requirement is adhered to and properly documented.</i>

General Program Compliance: SFA On-Site Monitoring

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

General Program Compliance: Local Wellness Policy

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| 15 | Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the Local Wellness Policy (LWP). | Discussed feasible means of notifying potential stakeholders of their ability to participate. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Tab. | <i>None required at this time.</i> |
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General Program Compliance: Competitive Food Services

No Findings

General Program Compliance: Professional Standards

No Findings

General Program Compliance: Water

No Findings

General Program Compliance: Food Safety, Storage and Buy American

No Findings

General Program Compliance: Reporting & Recordkeeping

No Findings

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

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| 16 | Although monthly menus are posted on district website and copies are available on-site, sufficient outreach to families regarding the availability of the School Breakfast Program (SBP) was not conducted at the beginning of or during the school year. Specifically, the serving times, locations where breakfast is available, and SBP costs are/is not communicated to families. | Discussed methods of notifying families of the availability of the SBP at the start of and throughout the school year and determined. Additionally, discussed SBP reminders must include: serving times, locations where breakfast is available, and SBP costs. | <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> |
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Other Federal Program Reviews: Afterschool Snack Program

Not Applicable

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2022 if applicable.

Other Federal Program Reviews: Fresh Fruit & Vegetable Program

Not Applicable

Other Federal Program Reviews: Special Milk Program

Not Applicable

Other Federal Program Reviews: At-Risk Afterschool Meals

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| 17 The At-Risk Afterschool Meals Site Review Form for Meals 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. At-Risk Afterschool Meals Site Review Form for Meals https://www.azed.gov/hns/afterschool/programforms under the Operational tab. | <i>Please provide a written description of the process that has been put in place to ensure that all sites operating At-Risk Afterschool Meals will receive a review prior to February 1 annually.</i> |
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Comments/Recommendations:

Thank you for your cooperation and completion of the NSLP Administrative Review. We commend the district in all of the efforts displayed to ensure safe and healthy meals reach the students that represent Rough Rock Elementary School. If you have any questions or concerns related to the program and its requirements, please reach out to your program specialist.

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

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by June 29, 2022 to Brandon.Estrada@azed.gov.



6/8/2022

Reviewer Signature

Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the [School Food Authority Appeal Procedure for the Administrative Review](#) found on the National School Lunch Program Administrative Review tab on the ADE website.

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