



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

**Administrative Review Summary Report**

School Food Authority Name: Whiteriver Unified District

CTD: 09-02-20

Site(s): Whiteriver Elementary

Contacts: Jennifer Plath, Superintendent; Sandie Sedillo, Business Manager

Review Date: March 29, 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	Meal count totals at lunch during the month of review were not correctly combined and recorded. Specifically, on 2/3/22, the number of meals tallied on the daily meal count sheet did not match the total number recorded. 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 service lines provide an accurate count by eligibility category.</i>
2	Meal count totals at lunch on the day of review were not correctly combined and recorded. Specifically, the number of meals tallied on the daily meal count sheet did not match the total number recorded. This was deemed a non-systemic error and did not contribute 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 service lines provide an accurate count by eligibility category.</i>

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

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| 3 | The following product could not be credited towards the meal pattern due to insufficient documentation: strawberry cream cheese bagel. Without sufficient documentation, the reviewer was unable to determine if the quantity requirements were met at breakfast on the day of review. This was not a repeat finding from previous cycle and did not contribute 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 Child Nutrition (CN) label and/or Product Formulation Statement (PFS) for the strawberry cream cheese bagel. If unable to provide a CN label or PFS, please provide written assurance that the product 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.</i> |
| 4 | The following product could not be credited towards the meal pattern due to insufficient documentation: burger patty. Without sufficient documentation, the reviewer was unable to determine if the quantity requirements were met at lunch on the day of review. This was not a repeat finding from previous cycle and did not contribute 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 Child Nutrition (CN) label and/or Product Formulation Statement (PFS) for the burger patty. If unable to provide a CN label or PFS, please provide written assurance that the product 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.</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 | Daily edit checks are not being conducted appropriately. Specifically, the total enrollment was used instead of the 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<br><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<br><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 April. Additionally, please provide written assurance that daily edit checks will be conducted.</i> |
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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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| 6 | Offer versus Serve (OVS) was not implemented properly. Specifically, students were not given the option to decline any meal components. | Provided technical assistance on proper implementation of OVS and discussed with kitchen and point of service staff. Reviewed menu and discussed options for a reimbursable meal under OVS. USDA's Offer Versus Serve Manual, Effective beginning School Year 2015-2016 can be 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. | <i>Please provide a written description demonstrating how OVS will be implemented properly. Additionally, please provide written assurance that moving forward, OVS will be implemented properly or site applications will be updated to indicate Serve Only meal service.</i> |
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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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| 7 | The Financial Management System utilized was insufficient to accurately identify and track all revenues and expenditures of the nonprofit school food service program. Specifically, the reviewer was not able to determine compliance with Maintenance of the Nonprofit School Food Service Account due to not receiving sufficient documentation. | Discussed feasibility for designating a separate financial account for the nonprofit school food service, as well as the requirement to differentiate revenues and expenditures of the nonprofit school food service program if a separate account cannot be designated. Discussed the importance of establishing a financial management system and internal controls needed to accurately track all revenues and expenditures of the nonprofit school food service program. | <i>Please provide a written description of steps that will be taken to ensure all revenues and expenditures of the nonprofit school food service account are easily identifiable as required in 7 CFR 210.14. Additionally, please provide the following documentation:</i> <ul style="list-style-type: none"><li>- Year-end statement of Revenue and Expenses for the Nonprofit School Food Service Account (detailed General Ledger or comparable documentation) for the most recently completed school year</li><li>- Supporting documentation for the selected sample of expenses</li><li>- Prior approval documentation for any equipment (\$5,000 or more) purchased during the most recently completed school year if applicable</li></ul> |
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| 8  | Net cash resources available in the nonprofit school food service account exceed the three month expenditure limit and approval from the ADE was not obtained.  | Discussed requirement that net cash resources must be limited to an amount that does not exceed 3 months average expenditures without prior approval from the ADE. Referred to 7 CFR 210.19.  | <i>Please provide documentation reflecting that net cash resources are below the 3 month average expenditure limit or provide a detailed spending plan to ADE for approval to maintain a balance in excess of the net cash resource limit.</i> |
| 9  | The Annual Financial Report was completed inaccurately. Specifically, the number of operating months was not reported. Additionally, the AFR was not provided with the review documentation.  | 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 and records will be maintained.</i>   |
| 10 | Sufficient documentation could not be 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>      |
| 11 | 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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12 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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No Findings

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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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No Findings

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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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13 The written food safety plan did not include adequate SOPs for serving breakfasts in the classroom / grab n' go breakfast carts.	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 for serving breakfasts in the classroom / grab n' go breakfast carts.</i>
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**General Program Compliance: Reporting & Recordkeeping**

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| 14 | Production record crediting information was not accurate for the following menu items:<br>-BBQ pork credits 1.5 oz MMA, not 2 oz MMA<br>-Sunbutter credits 1 oz MMA, not 2 oz MMA<br>-Burrito credits 2.5 oz eq grain, not 2.25 oz eq grain<br>-Pear credits as 1/2 cup fruit, not 1 1/4 cup fruit | 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. | <i>Please provide updated production records with accurate crediting information.</i> |
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**General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach**

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| 15 | 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.                         | <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>   |
| 16 | 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. 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 sites 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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Will be reviewed if claimed this school year.

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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 school year 2021-2022. Thank you for your hard work during the review process. Keep up the great 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.**

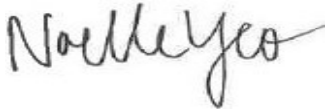
**Training: In-person classes, web-based training and How-To guides can be found on ADE's website at <https://www.azed.gov/hns/nslp/training>.**

Fiscal Action Assessed?

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| <input checked="" type="checkbox"/> No- SBP | <input type="checkbox"/> Yes- SBP                 | \$0        |
| <input type="checkbox"/> No- NSLP           | <input checked="" type="checkbox"/> Yes- NSLP     | \$182.50   |
| <input type="checkbox"/> No- SSO SBP        | <input checked="" type="checkbox"/> Yes- SSO SBP  | \$7,146.00 |
| <input type="checkbox"/> No- SSO NSLP       | <input checked="" type="checkbox"/> Yes- SSO NSLP | \$4,176.48 |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by June 10, 2022 to [Noelle.Yeo@azed.gov](mailto:Noelle.Yeo@azed.gov).



5/11/2022

Reviewer Signature

Date



5/11/2022

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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