



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

Administrative Review Summary Report

School Food Authority Name: Arizona Department of Corrections

CTD: 21-10-02)

Site(s): Success Academy - Lewis

Contacts: John Mattos, Warden; Pamela Smith, Food Service Liaison; Holly Drennan, Grants Manager; Theresa Stewart, ASO 1

Review Date: May 31, 2022

Review Period: April 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

<p>1 SFA does not have a waiver on file to serve the K-8 meal pattern to all grade groups.</p>	<p>Discussed RCCIs that serve special populations, such as students who are at-risk for incarceration, often have legitimate concerns about student unrest at meal times. Per SP 48-2013, RCCIs are able to serve the meal pattern planned for the highest grade/age group to all students if they submit an exception to ADE explaining operational limitations to separating age/grade groups and have legitimate safety concerns associated with serving students different portions. Advised SFA to contact assigned Specialist to submit an exception request and keep exception approval letter on file.</p>	<p><i>Please submit a meal pattern exception approved by assigned Specialist to reviewer. Additionally, please provide written assurance that an approved exception will be retained on file.</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

- | | | | |
|---|---|--|---|
| 2 | Daily edit checks are not being conducted appropriately. Specifically, the attendance factor generated by ADE is not in use during daily edit checks. | Discussed how to complete daily edit checks using ADE's Daily Edit Check worksheet. Discussed the attendance factor percentage accounts for the difference between enrollment and attendance. This information is used as a basic edit check for claims. The Daily Edit Check Worksheet can be found on ADE's website
https://www.azed.gov/hns/nslp/forms under the Operational tab. The Step-by-Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at
https://www.azed.gov/hns/nslp/training under the Online Training Library tab. | <i>Please provide a completed daily edit check worksheet for the month of June 2022. 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> |
| 3 | A Free and Reduced-Price Policy Statement and Statement Addendum- RCCI without Day Students have not been submitted to ADE. | Referred them to FRPPS template on ADE's website at website at
https://www.azed.gov/hns/nslp/forms under the Organizational tab. | <i>Please provide an updated and signed Free and Reduced-Price Policy Statement and Addendum. Additionally, please provide written assurance that moving forward, the Free and Reduced Price-Policy Statement will reflect current practices.</i> |

Meal Pattern & Nutritional Quality: Offer Versus Serve

No Findings

Meal Pattern & Nutritional Quality: Meal Components & Quantities

No Findings

Resource Management

No Findings

General Program Compliance: Civil Rights

- | | | | |
|---|--|---|---|
| 4 | Procedures for receiving and processing complaints alleging discrimination within the school meal programs are not in place. | Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., ADE, Food & Nutrition Services Southwest Regional Office, FNS Office of Civil Rights, or USDA Office of Civil Rights). The SFA's procedures must note whether an allegation is made verbally or in person. The SFA staff member receiving the allegation must transcribe the complaint. The SFA's procedures for receiving a complaint cannot prevent a complaint from being accepted. Additionally, the SFA's procedures must not indicate that they attempt to resolve the complaint themselves nor can the SFA's complaint process be a prerequisite for accepting a complaint. Additional guidance can be found on ADE's website at https://www.azed.gov/hns/civilrights . The Step-by-Step Instruction: How to File a Civil Rights Complaint can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library tab. | <i>Please provide a written description of the process and procedures for processing complaints alleging discrimination within FNS School Meal Programs. Additionally, the certificate of completion of Step-by-Step Instruction: How to File a Civil Rights Complaint must be submitted.</i> |
| 5 | 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> |
| 6 | The Civil Rights Compliance form is not being completed every year by December 15 and kept on file. | 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 https://www.azed.gov/hns/civilrights . The Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library tab. | <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> |

7 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.	<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>
---	--	---

General Program Compliance: SFA On-Site Monitoring

Not Applicable

General Program Compliance: Local Wellness Policy

8 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 https://www.azed.gov/hns/nslp/forms 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 https://www.azed.gov/hns/nslp/training under the Online Training Tab.	<i>Please provide a written plan for development of a Local Wellness Policy. This plan must identify the minimum required elements to be addressed in the policy, 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>
9 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 https://www.azed.gov/hns/nslp/training under the Online Training Tab.	<i>None required at this time.</i>

- | | | | |
|----|--|---|------------------------------------|
| 10 | The review and update of the Local Wellness Policy (LWP) is not occurring. | 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 https://www.azed.gov/hns/nslp/training under the Online Training Tab. | <i>None required at this time.</i> |
| 11 | 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> |
| 12 | A recent assessment of the implementation of the Local Wellness Policy (LWP) has not been conducted nor have plans been developed to complete the assessment. | Discussed requirement to complete an assessment once every three years, at a minimum. The assessment must measure how the LEA is complying with their LWP, how the LEA's LWP compares to the model wellness policy, and progress made in attaining the goals of the wellness policy. Additionally, discussed feasible means for notifying the public of the results of the most recent assessment. Sample evaluation tools can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Local Wellness Policy tab. Local Wellness Policy Assessment: Making it Meaningful 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> |
| 13 | A plan is not in place to notify the public of the results of the most recent assessment of the implementation of the Local Wellness Policy (LWP), when assessment is conducted. | Discussed requirement to make the most recent assessment available to the public. Also discussed feasible means for notifying the public of the results of the most recent assessment on the implementation of the LWP. The USDA's Local Wellness Policy Outreach Toolkit can be found at https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit/ . | <i>None required at this time.</i> |

General Program Compliance: Competitive Food Services

No Findings

General Program Compliance: Professional Standards

- | | | | |
|----|--|--|--|
| 14 | Documentation to support compliance with hiring standards requirements for School Nutrition Program Director was not provided. | 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 https://www.azed.gov/hns/nslp/training under the Online Courses tab. | <i>Please provide a completed new director hiring form provided by ADE. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i> |
| 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 https://theicn.org/icn-resources-a-z/food-safety/ . | <i>Please provide the expected date that food safety certification training will be completed by the School Nutrition Program Director.</i> |

General Program Compliance: Water

No Findings

General Program Compliance: Food Safety, Storage and Buy American

No Findings

General Program Compliance: Reporting & Recordkeeping

- | | | | |
|----|---|---|--|
| 16 | Production records for breakfast and lunch did not contain all required sections: age group served, total planned quantity of each item, actual number of servings prepared/available for meal service, and leftovers | Discussed required sections of production records. Production Record 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. | <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> |
|----|---|---|--|

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

No Findings

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

Not Applicable

Comments/Recommendations:

Thank you for your participation in the NSLP Administrative Review. My recommendation following the review is to strategize how program staff will be trained on program policy requirements, recordkeeping requirements, and civil rights requirements. 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?

- | | |
|--|--|
| <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 August 5, 2022 to Brandon.Estrada@azed.gov



6/23/2022

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.

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