



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

Administrative Review Summary Report

School Food Authority Name: St. Charles School

CTD: 04-20-03

Site(s): St. Charles School

Contacts: Lorraine Russell, Principal; Glendena Brown, School Lunch Coordinator

Review Date: March 30, 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	Lunch meal service observed on the day of review did not support that reimbursable meal counts are accurate. This was deemed a systemic error and contributed towards fiscal action calculations. A full recalculation of lunches served for the months of February through April will be conducted.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue.	<i>Changes to the procedures of meal counting and claiming have been and a fiscal recalculation was conducted. Fiscal action will not be assessed.</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 lunch during the day of review. Specifically, fat-free chocolate milk ran out during the meal service. 9 students were served where only one milk type was available. This was determined not 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 lunch 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 lunch.</i>
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| <p>3 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, 3/8 cup starchy vegetable subgroup was served which did not meet the minimum weekly requirement of 1/2 cup. This was determined not to be a repeat finding from previous cycle and did not contribute toward fiscal action calculations.</p> | <p>Discussed how current system 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 at 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).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that starchy vegetable subgroup quantities meet minimum amounts required by the meal pattern.</i></p> |
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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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| <p>4 Daily edit checks are not being conducted.</p> | <p>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 at 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.</p> | <p><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. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete Daily Edit Checks must be submitted.</i></p> |
| <p>5 The site application in CNPWeb does not accurately reflect the point of service procedures that were observed on-site. NSLP Site application indicated that the school is operating OVS, however, SFSP site application indicated not operating OVS. After discussing with SFA, the site has decided to operate OVS.</p> | <p>Advised SFA to update site application in CNPWeb and contact their assigned specialist to let them know of the changes.</p> | <p><i>Please submit a new SFSP site application in CNPWeb that accurately reflects the point of service. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i></p> |

Meal Pattern & Nutritional Quality: Offer Versus Serve

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| 6 Offer versus Serve (OVS) was not implemented properly. Specifically, NSLP Site application indicated that the school is operating OVS, however, SFSP site application indicated not operating OVS. After discussing with SFA, the site has decided to operate OVS. | 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 https://www.azed.gov/hns/nslp 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.</i> |
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Meal Pattern & Nutritional Quality: Meal Components & Quantities

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| 7 Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast nor 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/nslp/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

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| 8 Sufficient documentation of funds used to reimburse local sources of funds used to supplement the nonprofit school food service account to offset the impact of pandemic operations was not maintained. | Program operators using emergency operational costs funds to 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 must maintain documentation supporting these reimbursements for future audit or oversight purposes. 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 https://www.azed.gov/hns/memos . | <i>Please provide written procedures that will be implemented to ensure any reimbursements of local sources of funds used to supplement the nonprofit school food service account are adequately documented and kept on file.</i> |
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General Program Compliance: Civil Rights

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| 9 The USDA nondiscrimination statement was not printed on appropriate program materials, specifically the breakfast outreach materials. | 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 program material 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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| <p>10 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 and the accommodations were not being provided.</p> | <p>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 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 at https://www.azed.gov/hns/nslp/training under the Online Training Library tab.</p> | <p><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></p> |
| <p>11 The Civil Rights Compliance form is not being completed every year by December 15 and kept on file.</p> | <p>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.</p> | <p><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></p> |

General Program Compliance: SFA On-Site Monitoring

Not Applicable

General Program Compliance: Local Wellness Policy

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| 12 The Local Wellness Policy (LWP) did not contain goals for nutrition promotion. | Discussed feasible options for nutrition promotion goals that can be written into the LWP including offering contests, surveys, taste testing, providing information to families to encourage consumption of healthy foods at home, and displaying nutrition and health posters throughout campus. Team Nutrition Resources can be found at http://www.teamnutrition.usda.gov/ . 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> |
| 13 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 https://www.azed.gov/hns/nslp/training under the Online Training Tab. | <i>None required at this time.</i> |
| 14 The Local Wellness Policy (LWP) does not specify how and when a review and update of the policy is to occur. | Discussed the best setting and timeframe for the periodic review and update of the LWP as well as how this can be included in 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> |

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| 15 | The required stakeholders are not being permitted to be involved in the review and update of the Local Wellness Policy (LWP). Specifically, only the food service staff and principal met to review and update the 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 https://www.theicn.org/cnss/community-connection/assembling-the-team/ . 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> |
| 16 | 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> |
| 17 | The SFA did not opt into the Nationwide Waiver of Local School Wellness Policy Triennial Assessments in the National School Lunch and School Breakfast Programs. | Discussed updating the NSLP Sponsor application to indicate participating in the Nationwide Waiver of Local School Wellness Policy Triennial Assessments in the National School Lunch and School Breakfast Programs. Referred to HNS 13-2021 Applications for School Food Authorities Serving Meals During School Year 2021-2022. | <i>Please submit an updated NSLP Sponsor application indicating participation in the of Local School Wellness Policy Triennial Assessments in the National School Lunch and School Breakfast Programs. Additionally, provide written assurance that you follow-up with your assigned HNS Specialist.</i> |

General Program Compliance: Competitive Food Services

No Findings

General Program Compliance: Professional Standards

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| 18 | The School Nutrition Program Director hired after July 1, 2015 did not meet the hiring standard requirement. | 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 work with your program specialist to request an approval letter for LEAs with less than 500 students to hire a candidate that meets the educational standards but has less than three years experience.</i> |
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General Program Compliance: Water

No Findings

General Program Compliance: Food Safety, Storage and Buy American

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| 19 | A written food safety plan has not been developed. | Discussed required components of a food safety plan and resources available on ADE's website at https://www.azed.gov/hns/nslp/forms under the Food/Health Safety tab. | <i>Please provide a copy of a written food safety plan.</i> |
| 20 | 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: Suncup juices. Additionally, supporting documentation justifying a Buy American exception was not maintained/on file. | 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 at https://www.azed.gov/hns/nslp/forms under the Operational tab. Buy American Recorded Webinar and FAQ can be found at https://www.azed.gov/hns/nslp/training under the Online Training Library tab. | <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> |
| 21 | Documentation was not maintained to support that the school received two food safety inspections from the local health department each school year, or that the school requested two food safety inspections each year from the local health department. | Discussed that each site operating must obtain two food safety inspections from the local health department per school year or maintain documentation to show that two food safety inspections were requested from the local health department each school year. | <i>Please provide written assurance that documentation to show that two food safety inspections were received and/or requested from the local health department each school year will be maintained.</i> |
| 22 | 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> |

General Program Compliance: Reporting & Recordkeeping

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| 23 | The Free and Reduced Price Policy Statement was not provided as part of the review documentation. | Discussed record keeping requirements and timeframe of 5 years. | <i>Please provide written assurance that all documents pertaining to the school meal programs will be retained on file for at least 5 years, as is required by Arizona law, as well as a written plan for ensuring that this requirement is met.</i> |
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| 24 | Meal contribution crediting is not accurate for all recipes. Specifically, Mexicorn recipe credits as 3/8 cup starchy vegetable and 1/8 cup other vegetable, not 1/2 cup starchy vegetable. | Discussed updating recipes to reflect current products being used. | <i>Please provide an updated recipe for Mexicorn.</i> |
| 25 | Production records for breakfast and lunch provided did not contain all required sections: Specifically, production records used/left over section is not completed adequately. | 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> |
| 26 | Production record crediting information was not accurate for the hamburger bun served on 2/8/22 and 2/9/22. | 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 https://www.azed.gov/hns/nslp/forms under the Menu Planning tab. | <i>Please provide updated production records with accurate crediting.</i> |

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

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| 27 | 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. Discussed which entities in the local area operate the SFSP and how to notify families. Summer feeding locations can be found at https://www.azhealthzone.org/ . | <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 site 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

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 hard work during the Administrative Review process. Please note that the fiscal recalculation was completed and fiscal action will not be assessed. An initial report was sent to you on April 11, 2022 and corrective action for these findings is now past due. Reimbursements will be withheld until sufficient corrective action is received.

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 checked="" type="checkbox"/> No- NSLP | <input type="checkbox"/> Yes- NSLP | \$0 |
| <input type="checkbox"/> No- SSO SBP | <input type="checkbox"/> Yes- SSO SBP | To be determined |
| <input type="checkbox"/> No- SSO NSLP | <input type="checkbox"/> Yes- SSO NSLP | To be determined |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response **as soon as possible** to Noelle Yeo at Noelle.Yeo@azed.gov.

Noelle Yeo Digitally signed by Noelle Yeo
Date: 2022.06.22 09:09:42 -07'00'

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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