



## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Holbrook Unified District

CTD: 09-02-03

Site(s): Hulet Elementary School and Navajo County Instruction for Success (NCIS)

Contacts: W. Ray McLaws, Director of Food Services

Review Date: October 26-27, 2022

Review Period: September 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
<b>Performance Standard 1: Certification and Benefit Issuance – Critical Area</b>			

No Findings

#### Performance Standard 1: Meal Counting and Claiming – Critical Area

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| 1 | Meal count totals for the month of review were not correctly combined and recorded for lunch at Navajo County Instruction for Success. Specifically, on days where the meal count exceeded the attendance-adjusted eligible number, the attendance-adjusted eligible was used in the claim for reimbursement instead of the actual meal count. This was deemed a 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. Additionally, please work with the assigned HNS Specialist to update the attendance factor within CNPWeb.</i> |
| 2 | Meal count totals for the month of review were not correctly combined and recorded. Specifically, on 9/15/22, lunch meal records at Hulet Elementary counted 266 lunches, however, this was recorded on the daily edit check as 226. This resulted in an underclaim of 40 meals on the claim for reimbursement. 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.</i>   |

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

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| 3 | Documentation did not support that fluid milk was available in at least two varieties at lunch at Navajo County Instruction for Success on 9/19/2022. This was determined to be a repeat finding from previous cycle and contributed toward fiscal action calculations. | Discussed variety requirement (even for Headstart) and feasible options for compliance (i.e., in juvenile corrections facility). 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 8 cents). | <i>Please provide one week of lunch production records that demonstrate that fluid milk was available in at least two varieties at Navajo County Instruction for Success. 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>4 Documentation did not support that all required meal components were offered and served during the review period. Specifically, fruit was not recorded on 9/20/2022 at lunch at <b>Navajo County Instruction for Success</b>. This contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 8 cents) until sufficient corrective action is received.</p>  | <p>Discussed requirements for recordkeeping and/or meal pattern requirements for the grade groups served. Discussed specific missing items and suggested changes. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).</p>   | <p><i>Please provide one week of lunch production records which demonstrate compliance with the fruit requirements. Additionally, please provide written assurance that moving forward, all menus will be planned to meet the fruit requirements. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.</i></p> |
| <p>5 Documentation provided did not support that quantities served during the review period met minimum amounts required by the meal pattern. Specifically, minimum daily fruit requirements were not met on 9/19/22 and 9/22/22 at lunch at <b>Navajo County Instruction for Success</b>. The menu review was expanded to the full month of September. Additionally, the minimum daily fruit requirements were not met on: 9/1/22, 9/6/22, 9/7/22, 9/8/22, 9/12/22, 9/13/22, and 9/14/22.</p> <p>This was determined to be a repeat finding from previous cycle and contributed 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 (e.g., maintaining production records, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).</p> | <p><i>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 at lunch.</i></p>  |
| <p>6 Documentation provided did not support that quantities served during the review period met minimum amounts required by the meal pattern. Specifically, minimum weekly fruit requirements were not met during the review period at <b>Navajo County Instruction for Success</b>. This was determined to be a repeat finding from previous cycle and contributed 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 (e.g., maintaining production records, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).</p> | <p><i>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.</i></p>  |
| <p>7 Documentation provided did not support that quantities served during the review period met minimum amounts required by the meal pattern. Specifically, minimum daily vegetable requirements were not met on 9/19/22, 9/20/22, and 9/22/22 at lunch at <b>Navajo County Instruction for Success</b>. The menu review was expanded to the full month of September. Additionally, the minimum daily vegetable requirements were not met on: 9/1/22, 9/13/22, 9/14/22, and 9/15/22.</p> <p>This was determined to be a repeat finding from previous cycle and contributed 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 (e.g., maintaining production records, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that daily vegetable quantities meet minimum amounts required by the meal pattern.</i></p>   |

8	Documentation provided did not support that quantities served during the review period met minimum amounts required by the meal pattern. Specifically, minimum weekly vegetable requirements were not met during the review period at lunch at <b>Navajo County Instruction for Success</b> . This was determined to be a repeat finding from previous cycle 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 (e.g., maintaining production records, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).	<i>Please provide a written description of the changes that have been made to ensure that weekly vegetable quantities meet minimum amounts required by the meal pattern.</i>
9	Documentation provided did not support that quantities served during the review period met minimum amounts required by the meal pattern. Specifically, minimum weekly vegetable subgroup requirements were not met for the red/orange and other vegetable subgroups at lunch at <b>Navajo County Instruction for Success</b> . This was determined to be a repeat finding from previous cycle 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 (e.g., maintaining production records, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).	<i>Please provide a written description of the changes that have been made to ensure that red/orange and other vegetable subgroup quantities meet minimum amounts required by the meal pattern.</i>
10	Documentation did not support that fluid milk was available in at least two varieties at breakfast at <b>Hulet Elementary School</b> on 9/23/2022. This was determined to be a repeat finding from previous cycle and contributed toward fiscal action calculations.	Discussed variety requirement (even for Headstart) and feasible options for compliance (i.e., in juvenile corrections facility). 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 8 cents).	<i>Please provide one week of breakfast production records that demonstrate that fluid milk was available in at least two varieties at Hulet Elementary School. Additionally, please provide written assurance that fluid milk will always be available in at least two varieties at breakfast.</i>
11	Documentation provided did not support that quantities served during the review period met minimum amounts required by the meal pattern. Minimum daily vegetable requirements were not met on 9/22/22 at lunch at <b>Hulet Elementary School</b> . This was determined to be a repeat finding from previous cycle 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 (e.g., maintaining production records, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).	<i>Please provide a written description of the changes that have been made to ensure that daily vegetable quantities meet minimum amounts required by the meal pattern.</i>

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**Performance Standard 2: Dietary Specifications and Nutrient Analysis – Critical Area**

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Although not determined to be high risk for noncompliance with dietary specifications, the review of menu items and products served during the review period and on-site meal service indicated some practices that could be adjusted to improve nutrient quality of the menu. Specifically, processed meats such as sausage, bacon, pepperoni, ham, and salami were served in high frequency at breakfast and lunch.	Discussed specific items and suggested changes. Technical assistance was given in informing the SFA of the dietary specifications. Discussed processed meats are high in sodium and may cause menu to exceed the sodium restrictions.	<i>None required at this time.</i>
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**Meal Access & Reimbursement: Certification and Benefit Issuance**

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No Findings

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**Meal Access & Reimbursement: Verification**

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No Findings

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**Meal Access & Reimbursement: Meal Counting and Claiming**

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No Findings

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

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No Findings

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**Meal Pattern & Nutritional Quality: Meal Components and Quantities**

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No Findings

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**Resource Management**

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12 Unallowable costs were paid for by the nonprofit school food service account. Specifically, on 9/13/21, sodas were purchased at Dollar General for \$50.47. This purchase was coded as Program Foods on the general ledger.

Discussed specific unallowable expenses. An extensive list of allowable and unallowable costs can be found in 2 CFR 200 Subpart E General Provisions for Selected Items of Cost.

*Please provide a copy of existing procedures for determining the allowability of costs as required by 2 CFR 200.303(b)(7). Please also provide written assurance that all expenses of the nonprofit school food service account will be limited to those costs which are necessary, reasonable, allocable; and also that these costs are in accordance with 2 CFR 200 Subpart E Cost Principles. Additionally, please provide supporting documentation which reflects that the total amount of unallowable costs \$50.47 was reimbursed to the nonprofit school food service account.*

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**Procurement**

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13 Procurement was not in compliance with the requirements for the appropriate threshold. Specifically, the SFA did not ensure maximum open and free competition in the procurement of the following small purchases: FEC Music and Lunchtime Software.

Discussed that non-Federal entities must ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, the non-Federal entity must not preclude potential bidders from qualifying during the solicitation period.

*Please provide a written description of procurement procedures that will be followed prior to making a small purchase including the title of the individual within the SFA responsible for overseeing small purchases.*

14 Small purchase procedures were not in compliance with procurement requirements. Specifically, price or rate quotations were not obtained from an adequate number of qualified sources for the following small purchases: FEC Music and Lunchtime Software

Discussed that if small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources as determined appropriate by the non-Federal entity

*Please provide a written description of procurement procedures that will be followed prior to making a small purchase including the title of the individual within the SFA responsible for obtaining quotes for small purchases.*

15	The SFA did not maintain records sufficient to support the use of the emergency noncompetitive procurement method. Specifically, records detailing the former vendor cancelling delivery and the emergency procurement of a vendor able to delivery bread products were not maintained for the following noncompetitive purchases: Short Street Enterprises.	Discussed that, consistent with procurement regulations at 2 CFR 200.318(i), SFAs should retain information, data, and documents which qualify specific conditions and emergency circumstances which resulted in the decision to use the emergency noncompetitive procurement method and the procurement process, itself. Failure to plan for transition to competitive procurement cannot be the basis for continued use of noncompetitive procurement based on exigency or emergency circumstances. Documentation must include an explanation of the rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price. In addition, SFAs should retain documentation providing information on the food and supplies (e.g., delivery, processing, other) being procured, including the estimated quantity and dollar value of the emergency procurement; and how the emergency procurement was handled (i.e., obtained through negotiation, phone, email, etc.).	<i>Please provide a written description of procurement procedures that will be implemented to ensure that sufficient records will be maintained for all noncompetitive purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.</i>
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#### General Program Compliance: Civil Rights

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16	The USDA nondiscrimination statement was not printed on appropriate program materials. Specifically, the statement was not present on the SFSP outreach materials.	Discussed where to find nondiscrimination statement on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> 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>
17	The USDA nondiscrimination statement used on the monthly menus is not the correct USDA statement. Specifically, the statement used included an exclamation point.	Discussed where to find nondiscrimination statement on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> and whether long or short statement would be most appropriate.	<i>Please provide an updated monthly menu with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i>
18	The public/media release was not provided to local media, the unemployment office and local employers considering large layoffs.	Discussed requirements and timeframe for public/media release, and best options locally for submitting the release to. Showed where template release 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> . Discussed who would be responsible for doing this.	<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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| <p>19 Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, complaint procedures indicate that complaints alleging civil rights discrimination are handled internally by the food service director and/or superintendent.</p>                         | <p>Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., SA, FNSRO, 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 <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a>. The Step-by-Step Instruction: How to File a Civil Rights Complaint can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library tab.</p> | <p><i>Please provide a written description of the updated process and procedures for processing complaints alleging discrimination which meets requirements. Additionally, the certificate of completion of Step-by-Step Instruction: How to File a Civil Rights Complaint must be submitted.</i></p>  |
| <p>20 Medical statement for students with special dietary accommodations does not contain required sections. Specifically, medical statements for accommodations outside the meal pattern were not signed by a licensed professional, do not include a list of substitution(s), and do not indicate if modification is temporary or permanent.</p> | <p>Discussed required sections of the medical statement for students with special dietary accommodations. Referred to Medical Statement for Students with Special Dietary Accommodations 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 Operational 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> 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> |

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

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| 21 | Documentation was not provided to show that corrective action required as a result of the on-site review was sufficient. Specifically, the breakfast monitoring visit conducted on 10/7/22 indicated that corrective action was needed for meal counting methods as well as general areas. Documentation was not provided that the follow-up review was conducted to confirm that corrective action was implemented. | Discussed requirement for follow-up and examples of sufficient corrective action. | <i>Please provide a completed Internal On-Site Monitoring Form of the Meal Counting and Claiming System that demonstrates corrective action was completed for meal counting methods and general areas. Additionally, please provide a written description of the process that has been put in place to ensure that corrective action required as a result of on-site reviews will be implemented.</i> |
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**General Program Compliance: Local Wellness Policy**

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| 22 | The Local Wellness Policy (LWP) did not contain all required elements. Specifically, the LWP did not contain goals for nutrition promotion.                            | Discussed feasible options for nutrition promotion goals that can be written into the LWP. Discussed activity ideas which included offering contests, surveys, promotions and/or 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 <a href="http://www.teamnutrition.usda.gov/">http://www.teamnutrition.usda.gov/</a> . The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at <a href="https://www.azed.gov/hns/nsfp/training">https://www.azed.gov/hns/nsfp/training</a> under the Online Training Tab. | <i>Please provide a written plan for how specific goals for nutrition promotion will be added to the LWP. The plan should include draft language of the element to be added, who will be involved in updating the LWP, and the date the update is expected to be completed. Additionally, provide written assurance that the LWP will be specific to your institution.</i> |
| 23 | The review and update of the Local Wellness Policy (LWP), as specified in the policy itself, is not occurring nor is documentation being kept on file to support this. | 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 <a href="https://www.azed.gov/hns/nsfp/training">https://www.azed.gov/hns/nsfp/training</a> under the Online Training Tab.   | <i>Please provide a written description of how the LWP will be reviewed and updated as well as how reviews and updates will be documented.</i>   |

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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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| 24 A copy of the written food safety plan was not made available at <b>Navajo County Instruction for Success</b> .   | Discussed that this should be easily available at each food preparation and food service site and that staff should be aware of its existence.  | <i>Please provide written assurance that a copy of the written food safety plan has been made available at each site.</i>  |
| 25 Documentation was not maintained to support that <b>Navajo County Instruction for Success</b> and <b>Hulet Elementary School</b> 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>   |
| 26 The most recent food safety inspection report was not posted in a prominent location and was not visible to all program participants at <b>Navajo County Instruction for Success</b> nor <b>Hulet Elementary School</b> .   | 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 at Navajo County Instruction for Success and Hulet Elementary School. Additionally, please specify where the report has been posted.</i> |
| 27 Storage violations were observed at <b>Hulet Elementary School</b> . Specifically, two stacks of boxes of food were not stored 6 inches off the floor.  | Discussed specific violations and feasible solutions. Referred to Arizona's School Food Safety Guidance found on ADE's website at <a href="https://www.azed.gov/hns/nsfp/forms">https://www.azed.gov/hns/nsfp/forms</a> under the Food/Health Safety tab. Additionally, discussed Food Safety Online Courses can be found on ICN's website at <a href="https://theicn.org/icn-resources-a-z/food-safety/">https://theicn.org/icn-resources-a-z/food-safety/</a> . | <i>Please provide a written description of the changes that have been made to correct the storage violations found.</i>  |

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**General Program Compliance: Reporting and Recordkeeping**

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| 28 Production records for lunch at <b>Navajo County Instruction for Success</b> were not completed adequately. Specifically, leftover quantities were not recorded on the production records during the review period.  | Discussed required sections of production records. Production Record Templates can be found on ADE's website at <a href="https://www.azed.gov/hns/nsfp/forms">https://www.azed.gov/hns/nsfp/forms</a> under the Menu Planning tab. The Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at <a href="https://www.azed.gov/hns/nsfp/training">https://www.azed.gov/hns/nsfp/training</a> under the Online Training Library tab. | <i>Please provide copies of completed 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> |
| 29 Production records for breakfast and lunch at <b>Hulet Elementary School</b> were not completed adequately during the review period. Specifically, the used and leftover quantities were recorded incorrectly or not recorded on several dates throughout the review period.   | Discussed required sections of production records. Production Record Templates can be found on ADE's website at <a href="https://www.azed.gov/hns/nsfp/forms">https://www.azed.gov/hns/nsfp/forms</a> under the Menu Planning tab. The Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at <a href="https://www.azed.gov/hns/nsfp/training">https://www.azed.gov/hns/nsfp/training</a> 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.</i>   |
| 30 Meal pattern contribution information was not accurate on the lunch production records for the review period at <b>Navajo County Instruction for Success</b> . Crediting information was not correct for the following items: Spring Roll was recorded as 1/4 cup vegetable when valid crediting documentation was not provided for this item. | 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/nsfp/forms">https://www.azed.gov/hns/nsfp/forms</a> under the Menu Planning tab.  | <i>Please provide updated production records with accurate crediting information for the spring roll.</i>  |



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| <p>31 Meal pattern contribution information was not accurate on the lunch production records for the review period at <b>Navajo County Instruction for Success</b>. Crediting information was not correct for the following items: Fortune Cookie was recorded as 1/2 oz eq grain when it credits as 1.0 oz eq grain.</p>  | <p>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.</p> | <p><i>Please provide updated production records with accurate crediting for the fortune cookie.</i></p>          |
| <p>32 Meal pattern contribution information was not accurate on the lunch production records for the review period at <b>Navajo County Instruction for Success and Hulet Elementary School</b>. Crediting information was not correct for the following items: Dinner Roll was recorded as 1 oz eq grain and 1/2 cup vegetable. The dinner roll does not credit towards the vegetable component.</p>   | <p>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.</p> | <p><i>Please provide updated production records with accurate crediting for the dinner roll.</i></p>             |
| <p>33 Meal pattern contribution information was not accurate on the lunch production records for the review period at <b>Navajo County Instruction for Success</b>. Crediting information was not correct for the following items: Apple was recorded as 1/2 cup vegetable when it credits as 1 cup fruit.</p>   | <p>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.</p> | <p><i>Please provide updated production records with accurate crediting for apples.</i></p>                      |
| <p>34 Meal pattern contribution information was not accurate on the lunch production records for the review period at <b>Navajo County Instruction for Success and Hulet Elementary School</b>. Crediting information was not correct for the following items: Shredded cheese served in 0.75 ounce portion was recorded as 0.5 oz eq meat/meat alternate when a 0.75 oz portion of shredded cheese credits as 0.75 oz eq meat/meat alternate.</p> | <p>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.</p> | <p><i>Please provide updated production records with accurate crediting for shredded cheese.</i></p>             |
| <p>35 Meal pattern contribution information was not accurate on the breakfast and lunch production records for the review period at <b>Hulet Elementary School</b>. Crediting information was not correct for the following items: Hash brown was recorded as 1/2 cup vegetable when it actually credits as 1/4 cup vegetable.</p>   | <p>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.</p> | <p><i>Please provide updated production records with accurate crediting for the hash brown.</i></p>              |
| <p>36 Meal pattern contribution information was not accurate on the breakfast and lunch production records for the review period at <b>Hulet Elementary School</b>. Crediting information was not correct for the following items: Strawberry milk was recorded as 1/2 cup fruit when it actually credits as 1 cup milk.</p>   | <p>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.</p> | <p><i>Please provide updated production records with accurate crediting for strawberry milk.</i></p>             |
| <p>37 Meal pattern contribution information was not accurate on the breakfast and lunch production records for the review period at <b>Hulet Elementary School</b>. Crediting information was not correct for the following items: Breakfast sausage bagel was recorded as 1 oz eq meat/meat alternate, 1.75 oz eq grain, and 1/8 cup vegetable when it actually credits as 1 oz eq meat/meat alternate, 2 oz eq grain, and 1/8 cup vegetable.</p> | <p>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.</p> | <p><i>Please provide updated production records with accurate crediting for the breakfast sausage bagel.</i></p> |

38	Meal pattern contribution information was not accurate on the breakfast and lunch production records for the review period at <b>Hulet Elementary School</b> . Crediting information was not correct for the following items: Sliced cheese in a 0.5 ounce portion was recorded as 1 oz eq meat/meat alternate when it actually credits as 0.5 oz eq meat/meat alternate.	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 for sliced cheese.</i>
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**General Program Compliance: School Breakfast Program and Summer Food Service Program Outreach**

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39	Outreach to families regarding the availability of the School Breakfast Program (SBP) was not conducted at the beginning of the school year.	Discussed methods of notifying families of the availability of the SBP at the start of the school year. Additionally, discussed SBP outreach 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 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 the school year and written assurance that this will occur.</i>
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**Other Federal Program Reviews: Afterschool Snack Program**

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40	The counting system employed does not result in accurate snack counts. Specifically, meal counts were not taken at the point of service and, therefore, the reviewer could not validate counts. This contributed towards fiscal action calculations.	Discussed ways to improve the counting system or alter it to ensure accurate counts are submitted in the claim for reimbursement.	<i>Please provide a written description of the system that will be implemented to ensure accurate snack counts are claimed for reimbursement.</i>
41	Production records do not support that the Afterschool Snack Program (ASP) meal pattern was met on the following dates: 9/29/22. Specifically, only one meal component (fruit/veg) was served on this day.	Discussed the meal pattern requirements of the ASP. The ASP meal pattern table can be found on ADE's website at <a href="https://www.azed.gov/hns/afterschool">https://www.azed.gov/hns/afterschool</a> under the Meal Pattern tab.	<i>Please provide ASP production records for 5 consecutive days that demonstrate that the ASP meal pattern requirements have been met. Additionally, please provide written assurance that the ASP meal pattern will be adhered to at all times.</i>
42	Production records do not support that the Afterschool Snack Program (ASP) meal pattern was met on the following dates: 9/12/22, 9/19/22, and 9/29/22. Specifically, serving sizes were not recorded on the production records.	Discussed the meal pattern requirements of the ASP. The ASP meal pattern table can be found on ADE's website at <a href="https://www.azed.gov/hns/afterschool">https://www.azed.gov/hns/afterschool</a> under the Meal Pattern tab.	<i>Please provide ASP production records for 5 consecutive days that demonstrate that the ASP meal pattern requirements have been met. Additionally, please provide written assurance that the ASP meal pattern will be adhered to at all times.</i>
43	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 ASP monitoring requirements. A sample ASP monitoring form 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 Operational tab.	<i>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.</i>
44	The site does not have a standard operating procedure to ensure that snacks are properly prepared, held, served and stored within the proper food safety practices.	Discussed specific violations and feasible solutions. Referred to Arizona's School Food Safety Guidance 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. Additionally, discussed Food Safety Online Courses can be found on ICN's website at <a href="https://theicn.org/icn-resources-a-z/food-safety/">https://theicn.org/icn-resources-a-z/food-safety/</a> .	<i>Please provide a copy of the standard operating procedures found in the written food safety plan for operating the snack program.</i>

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

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Will be reviewed in Summer 2023 if applicable.

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**Other Federal Program Reviews: Fresh Fruit and 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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Thank you for your hard work and responsiveness during the review process! Your dedication to serving your students healthy, safe meals is evident. Please continue communication and training with your staff to ensure all program requirements are met and documentation is maintained. 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?**

<input checked="" type="checkbox"/> No- SBP	<input type="checkbox"/> Yes- SBP	\$224.80
<input type="checkbox"/> No- NSLP	<input checked="" type="checkbox"/> Yes- NSLP	\$1,721.46

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by January 12, 2023 to [Noelle.Schrankler@azed.gov](mailto:Noelle.Schrankler@azed.gov).

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Reviewer Signature

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Date

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Program Director Signature

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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 under the Reviews Conducted by the State Agency accordion on ADE's National School Lunch and School Breakfast Program webpage.

Equity for all students to achieve their full potential  
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