



Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Fredonia-Moccasin Unified District

CTD: 03-02-06

Site: Fredonia Elementary School

Contacts: Dorene Mudrow, Superintendent and Tina Button, Director

Review Date: March 14, 2023

Review Period: February 2023

Programs Reviewed:

☒ National School Lunch
☐ Fresh Fruit & Vegetable

☒ School Breakfast
☐ Special Milk

☐ Afterschool Snack
☐ At-Risk Afterschool Meals

No.	Review Observations & Findings	Technical Assistance Provided	Required Corrective Action
Performance Standard 1: Certification and Benefit Issuance – Critical Area			
1	In multiple instances, the eligibility determined was not transferred correctly to the benefit issuance document. This did not contribute toward fiscal action calculations.	Discussed requirement that eligibility status must be implemented within 10 operating days of receipt of an application. Discussed best practices (like having someone double check) for ensuring eligibility status is transferred to the benefit issuance document on a regular basis. The Step-by-Step Instruction: How to Create a Benefit Issuance Document (BID) can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Corrections has been made to the benefit issuance document. Please provide a written description of the process that will be implemented to ensure that the benefit issuance document matches all current students and their eligibility status. Additionally, the certificate of completion of Step-by-Step Instruction: How to Create a Benefit Issuance Document (BID) must be submitted.</i>
2	One denied application with two participants, was denied incorrectly after verification. Specifically, household application was denied due to incorrect income calculation.	Discussed errors found and required corrective action. Referred to Processing Applications, Reviewing Applications Based on Income, Assessing Completeness of Categorically Eligible Applications, Determining Eligibility for Categorically Eligible Applications section(s) in USDA's Eligibility Manual for School Meals found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion. Required -OR- Suggested completing the training: Step-by-Step Instruction: How to Process Household Applications found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Corrections have been made to the certification status. Please provide written procedures that will be implemented to ensure that applications will be double checked for accurate eligibility determinations utilizing current eligibility guidelines. Additionally, the certificate of completion of Step-by-Step Instruction: How to Process Household Applications must be submitted.</i>

3	The correct conversion factors were not used on applications with more than one income frequency provided. Specifically, child income was not added to the total income. This did not contribute toward fiscal action calculations.	Referred to Income Conversion Required under the Reviewing Applications Based on Income section in USDA's Eligibility Manual for School Meal found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion. The Step-by-Step Instruction: How to Process Household Applications can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Correction has been made to applications. Please provide written procedures for how and when conversion factors will be utilized and written assurance that the correct conversion factors will be applied to income applications with multiple frequencies. Additionally, the certificate of completion of Step-by-Step Instruction: How to Process Household Applications must be submitted.</i>
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Performance Standard 1: Meal Counting and Claiming – Critical Area

No findings.

Performance Standard 2: Meal Components & Quantities – Critical Area

4	Quantities planned during the review period did not meet weekly minimum amounts required by the meal pattern. Specifically, only 1/2 cup of red/orange vegetable was served and this does not meet the minimum weekly requirement of 3/4 cup. 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., changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. 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 accordion. 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 accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. 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 vegetable quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.</i>
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5	Quantities planned during the review period did not meet weekly minimum amounts required by the meal pattern. Specifically, only 1/4 cup of beans/peas(legumes) vegetable was served and this does not meet the minimum weekly requirement of 1/2 cup. 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., changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. 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 accordion. 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 accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. 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 beans/peas(legumes) vegetable quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.</i>
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Performance Standard 2: Dietary Specifications and Nutrient Analysis – Critical Area

No findings.

Meal Access & Reimbursement: Certification and Benefit Issuance

6	The benefit issuance document is not being updated in a timely manner to reflect changes in eligibility, for students.	Discussed potential changes that can be made to system to ensure that updates are made in a timely manner. The Step-by-Step Instruction: How to Create a Benefit Issuance Document (BID) can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Please provide a benefit issuance document that demonstrates timely updates, such as changes in eligibility, after verification. Additionally, please provide written assurance that moving forward, all updates will occur in a timely manner. Additionally, please provide the certificate of completion for Step-by-Step Instruction: How to Create a Benefit Issuance Document (BID) must be submitted.</i>
7	The sponsor application in CNPWeb indicated that SFA is using the notification letter provided by ADE when the SFA is using a custom notification letter.	Discussed steps required to update the sponsor application in CNPWeb to reflect current practice of utilizing a custom notification letter.	<i>Please resubmit a sponsor application indicating that a custom notification letter is being used. Additionally, please provide written assurance that the Sponsor Application in ADE's CNPWeb will accurately reflect current practices.</i>

Meal Access & Reimbursement: Verification

8 The most recent Verification Summary Report was not accurate. Specifically, the verification summary inaccurately reported that no response was sent to the SFA upon verification inquiry, when review documentation confirmed that a household response was given to the SFA.	Discussed that Verification Summary Report must reflect actual verification process and results, discussed specific discrepancies. Discussed attending ADE's Drop-in Workshop: Submitting for Verification. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion.	<i>Correction has been made to the Verification Summary Report. Please provide a written description of the changes that have been implemented to ensure that the Verification Summary Report will accurately reflect the verification practices and results that occurred.</i>
9 The most recent Verification Summary Report was not accurate. Specifically, the summary did not accurately report the number of applications and number of students confirmed through direct verification.	Discussed that Verification Summary Report must reflect actual verification process and results, discussed specific discrepancies. Discussed attending ADE's Drop-in Workshop: Submitting for Verification. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion.	<i>Correction has been made to the Verification Summary Report. Please provide a written description of the changes that have been implemented to ensure that the Verification Summary Report will accurately reflect the verification practices and results that occurred.</i>
10 The notice of adverse action was not adequate. Specifically, households for whom benefits are to be reduced or terminated were not given 10 calendar days written notice of the change prior to the date the change will go into effect.	Discussed all currently certified households for whom benefits are to be reduced or terminated must be given 10 calendar days written notice of the change prior to the date the change will go into effect [7 CFR 245.6a(j)]. The first day of the advance notice period is the day the notice is sent. The notice of adverse action may be sent via mail or to the e-mail address of the parent or guardian. The LEA cannot notify the household of adverse action by phone only. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion.	<i>Please provide written assurance that all households selected for whom benefits are to be reduced or terminated will be given 10 calendar days written notice of the change prior to the date the change will go into effect. Additionally, provide a copy of the form that will be used for this purpose.</i>
11 Verification procedures were not followed correctly. Specifically, households for whom benefits were to be reduced or terminated were not given 10 calendar days written advance notice of the change.	Discussed proper verification procedures and referred to ADE's Verification Tracking Form and Online Training: Verification Review on ADE's website at http://www.azed.gov/hns/nslp/verification . Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion.	<i>Please provide the written procedures for ensuring that households for whom benefits were to be reduced or terminated will be given 10 calendar days written advance notice of the change</i>

Meal Access & Reimbursement: Meal Counting and Claiming

12	The Free and Reduced-Price Policy Statement provided by the SFA does not reflect current practices and procedures observed on-site. Specifically, the policy no longer reflects the approval of the designated official or an authorized signer as indicated on the Food Program Permanent Service Agreement.	Referred them to FRPPS template on ADE's website at website at https://www.azed.gov/hns/nslp/forms under the Organizational accordion.	<i>Please provide an updated Free and Reduced-Price Policy Statement signed by the designated official or authorized signer. Additionally, please provide written assurance that moving forward, the Free and Reduced Price-Policy Statement will reflect current practices.</i>
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Meal Pattern & Nutritional Quality: Offer Versus Serve

13	Offer versus Serve (OVS) was not implemented properly. Specifically, students were not given the option to decline components during breakfast meal service.	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 and Quantities

No findings.

Resource Management

14	Meals served to teachers, administrators, custodians, and other adults were not priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or payroll funds, or funding from voluntary agencies) was sufficient to cover the overall cost of the meal.	Discussed ways to determine adult meal prices which included a per meal cost analysis and pricing utilizing the Adult Meal Pricing Tool. Non-Pricing Sites: pricing adult meals to reflect the amount of reimbursement received for a free meal plus the per meal value of entitlement and bonus commodities for non-pricing programs. Pricing Site: the paid meal price plus the amount of reimbursement received for a paid meal plus the per meal value of entitlement and bonus commodities for pricing programs. Referred to Adult Meal Pricing Tool SY 22-23 on ADE's website at https://www.azed.gov/hns/nslp/forms/ under the Financial accordion.	<i>Please provide a written description of the steps which have been taken to increase adult meal prices and resolve the discrepancy, including the exact formula used to price adult meals. Additionally, please submit supporting documentation which reflects that prices have been increased to the appropriate level.</i>
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Procurement

No findings.

General Program Compliance: Civil Rights

15	The font size of USDA's nondiscrimination statement is smaller than the rest of the text on notification letters.	Discussed printing requirements for the nondiscrimination statement. Referred to FNS Instruction 113-1 and SNP Guidance Manual.	<i>Please provide a copy of an updated notification letter which demonstrates compliance. Additionally, please provide written assurance that the font size of the nondiscrimination statement on all notification letters will be no smaller than the text of the document.</i>
16	Services are not in place for Limited English Proficient (LEP) households. Specifically, there is no policy or services in place to provide accommodations to Limited English Proficient households.	Discussed requirement that once aware of an LEP individual's needs, the LEA is responsible for ensuring that their application and other household materials are available in the language the LEP individual can understand. Referred to SP 37-2016 which can be found on ADE's Memos webpage at https://www.azed.gov/hns/memos .	<i>Please describe the services that will be in place when aware of LEP households henceforth.</i>

General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

17	The Local Wellness Policy (LWP) did not contain all required elements. Specifically, the 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 accordion.	<i>Please provide a written plan for how n policies for food and beverage marketing 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>
18	The Local Wellness Policy (LWP) did not contain all required elements. Specifically, the LWP did not contain a description of public involvement, public updates, policy leadership, and/or evaluation plan.	Discussed that local wellness policies are required to include a description of public involvement, public updates, policy leadership, and evaluation plan. 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 accordion.	<i>Please provide a written plan for how a description of public involvement, public updates, policy leadership, and evaluation plan 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>

19 The required stakeholders are not being permitted to be involved in the development, review, and update of the Local Wellness Policy (LWP). Specifically, students were not permitted to participate in the development, review, and update of 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 accordion.	<i>Please provide a written description of how all stakeholders, including students that were not permitted to participate, will be permitted to be involved in the development, review, and update of the LWP.</i>
20 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. [Note if SFA has decided upon an assessment method or tool.] 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 accordion. 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 accordion.	<i>Please provide a written plan for conducting an assessment of the implementation of the LWP. This plan must include who will be designated as the oversight official, who will be invited to participate in the assessment process, and the date by which the assessment is expected to be completed.</i>

General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

No findings.

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

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| 21 | The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: Sunup juice (orange, grape and apple juice) contains concentrates from USA, Argentina, Brazil, China, Chile, Poland, and/or New Zealand, and cucumber from Mexico. Additionally, 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 on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational accordion. Buy American Recorded Webinar and FAQ can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion. | <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> |
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| 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>Correction has been made during on-site review 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 and Recordkeeping

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| 23 | lunch production records provided are not separated by site. Specifically, Fredonia Elementary School and Fredonia High School are combined onto one production record. Each site serves different meal patterns; Fredonia Elementary School serves grades Pre-K-6 and Fredonia High School serves 7th-12th grade. □ | Discussed using separate Production Record for Multiple Grade Groupings and different sites. Training for production records for multiple grade groupings can be found at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. 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 accordion. | <i>Please provide copies of completed lunch Production Record for Separate Sites and Multiple Grade Groupings for 5 consecutive days. Additionally, the certificate of completion of Production Record Overview must be provided.</i> |
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24	The following product could not be credited towards the meal pattern due to insufficient documentation: Sausage Patty served on SBP February 6, at breakfast, and Peas & Carrots in the brown rice, served on NSLP February 9, 2023 at lunch. Without sufficient documentation, the reviewer was unable to determine if the quantity requirements were met. This did not contribute towards fiscal action calculation.	Discussed requirements regarding processed product documentation and provided examples. USDA Food Fact Sheets can be found on USDA's website at https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets/ . The CN Labels and Product Formulation Statements Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. 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 recipe for the brown rice that include the peas and carrots. Additionally, please provide a description of changes made to ensure recipes are maintained for all items served.</i>
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General Program Compliance: School Breakfast Program and Summer Food Service Program Outreach

25	Households were not notified of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year.	Discussed which entities in the local area operate the SFSP and how to notify families. And discussed other resources within the local area to provide families regarding meals during the summer months when school is not in session. And 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 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

Not applicable.

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2023 if applicable.

Other Federal Program Reviews: Fresh Fruit and 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:

Congratulations, Fredoina-Moccasin Unified District, has successfully completed the Administrative Review for the 22-23 school year. Thank you for your cooperation during the review process. Please remember that we have a variety of trainings (in-person and online) to assist you and your staff in operating a successful National School Lunch Program.

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	\$0.00
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$373.32

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by May 11, 2023 to Amy Dixon Banire at Amy.DixonBanire@azed.gov.

Reviewer Signature	Date
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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.

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