



Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Chilchinbeto Community School

CTD: 09-40-06

Site: Chilchinbeto Community School

Contacts: Eugene Charley, Principal, Angelita Clitso Business Manager, and Shirley Bia, Head Cook

Review Date: March 30, 2023

Review Period: February 2023

Programs Reviewed:

☒ National School Lunch

☒ School Breakfast

☐ Afterschool Snack

☐ Fresh Fruit & Vegetable

☐ Special Milk

☒ At-Risk Afterschool Meals

No.	Review Observations & Findings	Technical Assistance Provided	Required Corrective Action
Performance Standard 1: Certification and Benefit Issuance – Critical Area			
	No Findings.		
Performance Standard 1: Meal Counting and Claiming – Critical Area			
	No Findings.		
Performance Standard 2: Meal Components & Quantities – Critical Area			
1	Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, only 7 oz eq of grains were served at lunch for the entire week when 8 oz eq of grains is required for the week. This was determined to be a repeat finding from the 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. 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 grains quantities meet minimum amounts required by the meal pattern.</i>

2	<p>Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, only 5.5 oz eq of M/MA were served at lunch for the entire week when 9 oz eq of M/MA is required for the week. This was determined to be a repeat finding from the 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., 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. 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 M/MA quantities meet minimum amounts required by the meal pattern.</i></p>
3	<p>The following products could not be credited towards the meal pattern due to insufficient documentation: cinnamon rolls and whole wheat roll. Without sufficient documentation, the reviewer was unable to determine if the quantity requirements were met on dates 2/7/2023 and 2/10/2023. This was not determined to be a repeat finding from the previous cycle and did not contribute towards fiscal action calculations or result in the termination of performance-based reimbursement (extra 8 cents) until sufficient corrective action is received.</p>	<p>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).</p>	<p><i>Please provide a Child Nutrition (CN) label and/or Product Formulation Statement (PFS) for cinnamon rolls, bean tostada, macaroni and cheese, and whole wheat roll. If unable to provide a CN label or PFS, please provide written assurance that the product will no longer be offered/served to students. Additionally, please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation.</i></p>
4	<p>The following products could not be credited towards the meal pattern due to insufficient documentation: bean tostada and macaroni and cheese. Without sufficient documentation, the reviewer was unable to determine if the M/MA quantity requirements were met on dates 2/6/23 and 2/9/23. This was not determined to be a repeat finding from the previous cycle and did not contribute towards fiscal action calculations or result in the termination of performance-based reimbursement (extra 8 cents) until sufficient corrective action is received.</p>	<p>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).</p>	<p><i>Please provide a Child Nutrition (CN) label and/or Product Formulation Statement (PFS) for cinnamon rolls, bean tostada, macaroni and cheese, and whole wheat roll. If unable to provide a CN label or PFS, please provide written assurance that the product will no longer be offered/served to students. Additionally, please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation.</i></p>

Performance Standard 2: Dietary Specifications and Nutrient Analysis – Critical Area		
No Findings.		
Meal Access & Reimbursement: Certification and Benefit Issuance		
No Findings.		
Meal Access & Reimbursement: Verification		
No Findings.		
Meal Access & Reimbursement: Meal Counting and Claiming		
5	Daily edit checks are not being conducted appropriately. Specifically, the attendance factor does not match the claim submitted.	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 https://www.azed.gov/hns/nslp/forms under the Operational accordion. 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 accordion.
		<i>Please provide a completed daily edit check worksheet for the month of May 2023. 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>
Meal Pattern & Nutritional Quality: Offer Versus Serve		
No Findings.		
Meal Pattern & Nutritional Quality: Meal Components and Quantities		
No Findings.		

Resource Management

6	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 for the 2023-2024 school year, including the exact formula used to price adult meals. Additionally, please submit supporting documentation which reflects that steps will be taken to increase prices to the appropriate level for school year 2023-2024.</i>
7	The Financial Management System utilized was insufficient to accurately identify and track all revenues and expenditures of the nonprofit school food service program.	Discussed feasibility for designating a separate financial account for the nonprofit school food service, as well as the requirement to differentiate revenues and expenditures of the nonprofit school food service program if a separate account cannot be designated. Discussed the importance of establishing a financial management system and internal controls needed to accurately track all revenues and expenditures of the nonprofit school food service program.	<i>Please provide a written description of steps that will be taken to ensure all revenues and expenditures of the nonprofit school food service account are easily identifiable as required in 7 CFR 210.14.</i>
8	Sufficient documentation could not be provided to support the indirect costs charged to the nonprofit school food service account. In order for costs to be allowable they must be adequately documented as required in 2 CFR 200.403(g).	Discussed cost allowability requirements for federal awards and that all costs charged to a federal award must be adequately documented. Referred to 2 CFR 200.403(g). Reviewed requirements that indirect costs be charged consistently across the SFA as required in 2 CFR 200.412-414. Referred to the USDA's Indirect Cost Guidance Manual located at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion, which can be used as a resource when determining allowable indirect costs.	<i>Please provide written procedures that will be implemented to ensure all indirect costs charged to the nonprofit school foodservice account and any necessary supporting documentation are adequately documented and kept on file.</i>

Procurement

9	The SFA did not provide documented procurement procedures that include that small, minority, and women's business enterprises and labor surplus firms are used when possible.	Discussed that non-Federal entities must have and use documented procurement procedures, consistent with State, local, and tribal laws and regulations and the standards of the Code of Federal Regulations for the acquisition of property or services required under a Federal award or subaward. The non-Federal entity's documented procurement procedures must conform to the procurement standards identified in 2 CFR 200.317 through 2 CFR 200.327.	<i>Please provide written procurement procedures that are consistent with 2 CFR 200.317 through 2 CFR 200.327.</i>
10	The SFA did not maintain records sufficient to detail the significant history of the procurement for formal purchases. Specifically, records detailing the rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price were not maintained for the following formal purchases: Sysco.	Discussed that non-Federal entities must maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to, the following: Rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.	<i>Please provide a written description of procurement procedures that will be implemented to ensure that sufficient records detailing the records detailing the rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price will be maintained for all formal purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.</i>

General Program Compliance: Civil Rights

11	The public/media release provided to local media, the unemployment office and local employers considering large layoffs did not contain correct information as applicable for a community eligibility provision school. Specifically, the ADE media release template was used, but was not edited to reflect that this is a CEP school and all meals served to children will be free, regardless of family income.	Discussed schools operating SSO must provide public notification regarding the availability of school meals and the eligibility criteria at or near the beginning of the school year. For SY 2021-2022, schools participating in SSO should notify households that meals will be offered free through SSO. Referred to HNS 17-2021 & SP 15-2021 (Q10). Additionally, referred to the template release that can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Outreach accordion.	<i>Please provide a copy of updated public media/release template which demonstrates compliance. Additionally, please provide written assurance that the public/media release provided to local media, the unemployment office and local employers considering large layoffs will contain all required sections.</i>
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12	The public/media release was not provided to local media, the unemployment office and local employers considering large layoffs.	Discussed 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 https://www.azed.gov/hns/nslp/forms/ . 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>
13	Services are not provided to Limited English Proficient (LEP) 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 available to LEP households henceforth.</i>
14	Program staff have not finished training on civil rights topics. Specifically, it was documented that 0.40 hours was completed of civil rights training instead of 1 hour.	Discussed requirement and how to document that requirement has been met. An acceptable civil rights power point training material can be found on ADE's website at https://www.azed.gov/hns/civilrights .	<i>Please provide written assurance that all food service staff will be trained at hire and as needed on Civil Rights Compliance in Child Nutrition Programs. Describe the process that will be implemented to ensure that this requirement is adhered to and properly documented.</i>
15	The Civil Rights Compliance form is not being completed every year by December 15 and kept on file. Additionally, the civil rights compliance form was not filled out correctly. Specifically, the "ethnicity" section should total to 100%, but it totaled to 0%.	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 accordion.	<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>
16	The "And Justice for All" poster was not the most up to date "And Justice for All" poster.	Discussed requirements of where poster must be placed and where to find a printable "And Justice For All" poster on ADE's website at https://www.azed.gov/hns/civilrights . Referred to HNS 08-2019 USDA Nondiscrimination And Justice for All Poster Clarification.	<i>Please provide pictures to demonstrate the updated posters are now displayed in a prominent location and visible to all program participants. Additionally, please provide written assurance that the "And Justice For All" poster has been displayed in a prominent location and visible to all program participants.</i>

General Program Compliance: SFA On-Site Monitoring		
No Findings.		
General Program Compliance: Local Wellness Policy		
17	The public is not being notified of the existence and contents of the Local Wellness Policy (LWP).	Discussed feasible means of notifying the public about the LWP. [Note any methods the school may have decided to employ]. 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 the public will be notified of the existence and contents of the LWP.</i>
18	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 https://www.azed.gov/hns/nslp/training under the Online Training accordion.
		<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>
19	The required stakeholders are not being permitted to be involved in the development, review, and update of the Local Wellness Policy (LWP). Specifically, parents, students, the school board, general public, 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 parents, students, the school board, general public, will be permitted to be involved in the development, review, and update of the LWP.</i>
General Program Compliance: Competitive Food Services		
No Findings.		

General Program Compliance: Professional Standards

20	The School Nutrition Program Director hired after July 1, 2015 did not complete the required 8 hours of food safety training within 30 days of being hired or within 5 years prior to hire date.	Discussed requirement and feasibility for attending an available certification training within current school year. Food Safety Online Training Library can be found on ICN's website at https://theicn.org/icn-resources-a-z/food-safety/ .	<i>Please provide the expected date that food safety certification training will be completed by the School Nutrition Program Director.</i>
21	The School Nutrition Program Director did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.	Discussed 12 hour requirement and feasibility for attending upcoming applicable trainings. Training Curriculum for Arizona Child Nutrition Professionals Operating the National School Lunch and School Breakfast Program can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Build Your Employees Training Plans accordion. 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 Training Library accordion.	<i>Please provide the expected date that the training requirement will be met as well as the name, date and content information of trainings that the School Nutrition Program Director is registered for. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i>
22	Full-time School Nutrition Program staff have not met the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.	Discussed 6 hour training requirement and feasibility for attending upcoming applicable trainings. Training Curriculum for Arizona Child Nutrition Professionals Operating the National School Lunch and School Breakfast Program can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Build Your Employees Training Plans accordion. 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 Training Library accordion.	<i>Please provide the expected date that the training requirement will be met as well as the name, date and content information of trainings that full-time School Nutrition Program staff are registered for.</i>

General Program Compliance: Water

No Findings.

General Program Compliance: Food Safety, Storage and Buy American

23	The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) Specifically, documentation tracking 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 how you will maintain records properly by using one Buy American form for each item purchased with dates to ensure that the requirements of the Buy American Provision are met.</i>

General Program Compliance: Reporting and Recordkeeping

No Findings.		

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

24	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>
25	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.	<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>

Other Federal Program Reviews: Afterschool Snack Program

No 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

No Applicable.

Other Federal Program Reviews: Special Milk Program

No Applicable.

Other Federal Program Reviews: At-Risk Afterschool Meals

No Findings.

Comments/Recommendations:

Congratulations, Chilchinbeto Community School has successfully completed the Administrative Review for the 2022-2023 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?

☒ No- SBP ☐ Yes- SBP \$0.00
☐ No- NSLP ☒ Yes- NSLP \$1,873.89

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by June 7, 2023 to Megan.Lynch@azed.gov._____
Reviewer Signature_____
Date_____
Program Director Signature_____
Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the [School Food Authority Appeal Procedure for the Administrative Review](#) found under the Reviews Conducted by the State Agency accordion on ADE's National School Lunch and School Breakfast Program webpage.

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