

# **Health and Nutrition Services Division**

	Admin	istrative Review Summary Rep	ort
Sch	nool Food Authority Name: Havasupai Eleme	ntary School	
CTI	D: 09-91-07		
Site	e: Havasupai Elementary School		
Cor	ntacts: Maxine Roanhorse-Dineyazhe, Educa	ation Administrator and Douglas Barı	inger, Principal
	Review Date: March 30-31, 2023	Ţ.	3 / 1
	Review Period: February 2023		
	Programs Reviewed:   National Scho	ol Lunch School Breakfast	☐ Afterschool Snack
	☐ Fresh Fruit & Vege	etable	At-Risk Afterschool Meals
No.		Technical Assistance Provided	Required Corrective Action
	<u> </u>	rd 1: Certification and Benefit Issuand	•
	No findings.		
	Performance Stan	dard 1: Meal Counting and Claiming -	- Critical Area
	No findings.		
		ard 2: Meal Components & Quantities	
1	Portion sizes observed during the day of review	Discussed how current system allowed	
	did not meet minimum amounts required by the	for this to happen and potential	production records which demonstrates that
	breakfast meal pattern. Specifically, on March 31, 2023, French Toast crediting as 0.75 ounce	changes that could be made to ensure it doesn't continue (i.e., offering a grain	
	equivalents (oz eq) was served with a Sausage	that credits as at least 1.0 ounce	toward the grain component along with labels
	Patty crediting as 0.75 oz eq meat/meat	equivalent). Discussed with cafeteria	and/or recipes for all grains listed on the
	alternate. Meat/meat alternates may not be	staff how to properly identify and count	
	counted toward the grain component until after	reimbursable meals, as well as	provide a written description of the changes
	the minimum daily grains requirement (1.0 oz) is		that have been made to ensure that at least
	offered.	a reimbursable meal. Meal pattern	1.0 ounce equivalent of grain will be offered
		requirements for the National School Breakfast Program can be found on	prior to crediting meat/meat alternates toward
		ADE's website at	the grain component.
		https://www.azed.gov/hns/nslp under	
		the Meal Pattern accordion. The Step-	
		by-Step Instruction: How to Plan a	
		Breakfast Menu can be found on ADE's	;
		website at	

https://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).

2 Portion sizes observed during the month of review did not meet minimum amounts required for this to happen and potential by the breakfast meal pattern. Specifically, on February 6, 2023, Toast crediting as 0.75 ounce equivalents (oz eq) was served with Scrambled Eggs crediting as 2.0 oz eq. Meat/meat alternates may not be counted toward the grain component until after the minimum daily grains requirement (1.0 oz) is offered.

Discussed how current system allowed Please provide one week of breakfast changes that could be made to ensure that credits as at least 1.0 ounce for the National School Breakfast Program can be found on ADE's website at

https://www.azed.gov/hns/nslp under the Meal Pattern accordion. The Stepby-Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at

https://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).

production records which demonstrates that at least 1.0 ounce equivalent of grain was it doesn't continue (i.e., offering a grain offered prior to crediting meat/meat alternates toward the grain component along with labels equivalent). Meal pattern requirements and/or recipes for all grains listed on the production record. Additionally, please provide a written description of the changes that have been made to ensure that at least 1.0 ounce equivalent of grain will be offered prior to crediting meat/meat alternates toward the grain component.

3 Quantities observed on the during the review period did not meet minimum amounts required by the meal pattern. Specifically, insufficient daily grain quantities were served at lunch on February 7, 2023; 0.75 ounce equivalents (oz eq) grain were served when 1.0 oz eq grain is required daily. This was determined to be a repeat finding from the previous cycle and contributed toward fiscal action calculations. This was not a repeat finding from the previous cycle and did not contribute toward fiscal action calculations.

for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in bread products, label maintenance, National School Lunch Program can be Lunch Menu must be submitted. found on ADE's website at http://www.azed.gov/hns/nslp under the Meal Pattern accordion. The Stepby-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. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).

Discussed how current system allowed Please provide a written description of the changes that have been made to ensure that daily grain quantities at lunch meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of etc.). Meal pattern requirements for the Step-by-Step Instruction: How to Plan a

4 Quantities observed during the review period did Discussed how current system allowed Please provide a written description of the not meet minimum amounts required by the meal pattern. Specifically, insufficient weekly grain quantities were served at breakfast; 3.0 ounce equivalents (oz eq) grain was documented as served when 8.0 oz eq grain is required weekly. This was not a repeat finding from the previous cycle and did not contribute toward fiscal action calculations.

for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in bread products, label maintenance, National School Breakfast Program can be found on ADE's website at http://www.azed.gov/hns/nslp under the Meal Pattern accordion. The Stepby-Step Instruction: How to Plan a Breakfast Menu 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).

changes that have been made to ensure that weekly grain quantities at breakfast meet minimum amounts required by the meal pattern. Additionally, the certificate of etc.). Meal pattern requirements for the completion of Step-by-Step Instruction: How to Plan a Breakfast Menu must be submitted.

5 Quantities observed during the review period did Discussed how current system allowed Please provide a written description of the not meet minimum amounts required by the meal pattern. Specifically, insufficient daily grain quantities were served at lunch on February 7, 2023; 0.75 ounce equivalents (oz eq) grain were served when 1.0 oz eq grain is required daily. This was determined to be a repeat finding from the previous cycle and contributed toward fiscal action calculations. This was not a repeat finding from the previous cycle and did not contribute toward fiscal action calculations.

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changes that have been made to ensure that daily grain quantities at lunch meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of etc.). Meal pattern requirements for the Step-by-Step Instruction: How to Plan a

not meet minimum amounts required by the meal pattern. Specifically, insufficient weekly grain quantities were served at lunch; 4.25 ounce equivalents (oz eq) grain was documented as served when 8.0 oz eq grain is required weekly. This was not a repeat finding from the previous cycle and did not contribute toward fiscal action calculations.

for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in bread products, label maintenance, National School Lunch Program can be to Plan a Lunch Menu must be submitted. found on ADE's website at http://www.azed.gov/hns/nslp under the Meal Pattern accordion. The Stepby-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. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).

6 Quantities observed during the review period did Discussed how current system allowed Please provide a written description of the changes that have been made to ensure that weekly grain quantities at lunch meet minimum amounts required by the meal pattern. Additionally, the certificate of etc.). Meal pattern requirements for the completion of Step-by-Step Instruction: How

7 The following products could not be credited towards the meal pattern due to insufficient documentation: Cinnamon Roll (2/9/23 breakfast), Egg & Cheese Sandwich (2/10/23 breakfast), Chicken Noodle Soup (2/7/23 lunch), Biscuit (2/9/23 lunch), and Tortilla (2/10/23 lunch). Without sufficient documentation, the reviewer was unable to determine if the quantity requirements were met. This was not a repeat finding from the previous cycle and did not contribute toward fiscal action calculations.

Discussed requirements regarding processed product documentation and provided examples. USDA Food Fact Sheets can be found on USDA's website at

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 of performance-based reimbursement (extra 8 cents).

Please provide appropriate crediting documentation for Cinnamon Roll, Egg & Cheese Sandwich, Chicken Noodle Soup, Biscuit, and Tortilla. This should include recipes, Nutrition Facts labels, Child Nutrition https://www.fns.usda.gov/fdd/nslp-usda-(CN) labels, and/or Product Formulation Statements (PFS) as applicable. If unable to obtain sufficient crediting documentation, please provide written assurance that the product will no longer be offered/served to students and indicate what will be served in its place (include crediting documentation for any replacements). Additionally, please provide written assurance that a product will not be result in fiscal action and/or termination credited towards the meal pattern without proper crediting documen tation. Additionally, the certificate of completion of CN Labels and Product Formulation Statements must be provided.

Performance Standard 2: I	Dietary Specifications and Nutrient An	alysis – Critical Area
No findings.		
Maal Access 9 D	eimbursement: Certification and Bene	fit leavene
No findings.	elmbursement: Certification and Bene	TIT ISSUANCE
No illialitys.		
Meal A	Access & Reimbursement: Verification	1
No findings.		
No findings.	Reimbursement: Meal Counting and	Claiming
No ilifalligs.		
Meal Patter	rn & Nutritional Quality: Offer Versus	Serve
No findings.		
Maal Dattawa 9 No.	tuiti anal Osalita Maal Osaan saanta an	od Overskities
No findings.	tritional Quality: Meal Components ar	id Quantities
No mangs.		
	Resource Management	
8 Meals served to nonprogram staff (e.g., teachers, administrators, custodians) 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. Specifically, no non-Federal funds were used to recover the cost of serving meals free of charge to nonprogram adults.	Discussed ways to determine adult meal prices which included a per meal cost analysis and pricing utilizing the Adult Meal Pricing Tool. Adult meal charges must reflect the amount of reimbursement received for a free meal plus the per meal value of entitlement and bonus commodities for non-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.	Please provide a written description of the steps which have been taken to establish adult meal prices and resolve the discrepancy, including the exact formula used to price adult meals. Additionally, please provide a written description of how the funds will be recovered including what non-Federal source of funds will be used to recover the costs. If establishing teachers as program staff, please update the Method of Meal Counting Description in Section 6 of Havasupai Elementary School's CNPWeb Sponsor Application and provide training trackers for all program staff.
	Procurement	
No findings.		
Gene	ral Program Compliance: Civil Rights	
No findings.		
5		
General Pro	ogram Compliance: SFA On-Site Moni	toring
No findinas.		

#### **General Program Compliance: Local Wellness Policy**

9 A Local Wellness Policy (LWP) has not been developed.

Discussed preliminary planning, such as who will be named as the designated LWP official and how required stakeholders will be invited to participate in the process. Reviewed handouts and discussed developing a LWP with required elements. Local Wellness Policy resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Local Wellness Policy accordion. 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 A Local Wellness Policy was drafted during the on-site review. No further corrective action is required.

### **General Program Compliance: Competitive Food Services**

under the Online Training accordion.

No findings.

# General Program Compliance: Professional Standards or did not Discussed 12 hour requirement and Pleas

10 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.

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

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.

11 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 Online Training Library

accordion.

nttps://www.azed.gov/hns/nsip/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.

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.

12 Professional Standards training hours are not being tracked on an annual basis.

Referred to ADE's Training Tracking forms found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Professional Standards 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.

Please provide the tracker that will be used to track Professional Standards training hours on an annual basis for all School Nutrition Program staff. Additionally, please provide written assurance that Professional Standards training hours will be tracked for all School Nutrition Program staff on an annual basis. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.

### **General Program Compliance: Water**

No findings.

# General Program Compliance: Food Safety, Storage and Buy American

13 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed school: Ardmore Apple Juice (concentrate from USA, China, Chile, Mexico, Turkey, Spain, and Poland). 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.

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.

## **General Program Compliance: Reporting and Recordkeeping**

14 Production record crediting is inaccurate. Specifically, bread served at breakfast on February 6, 2023 (toast) and March 31, 2023 (French toast) and at lunch on February 7, 2023 records. Crediting resources can be credited as 0.75 oz eq grain; however, the production record indicated it contained 1.0 oz eq grain.

Discussed how to credit meal components and ensuring consistency with recipes, labels, and production found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion.

Please provide a production record that reflects the correct crediting information for bread. If purchasing a different sliced bread product than what was observed during the review period, please provide the new product's Nutrition Facts label. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.

15 Production record crediting is inaccurate. Specifically, the sausage patty served at breakfast on March 31, 2023 credited as 0.75 oz eq meat/meat alternate; however, the production record indicated it contained 1.0 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 accordion.

Please provide a production record that reflects the correct crediting information for sausage patty. If purchasing a different sausage patty than what was observed during the review period, please provide the label to support crediting on the production record. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.

16 Production record crediting is inaccurate. Specifically, the chicken nuggets served at lunch on February 7, 2023 and March 30, 2023 credited as 1.25 oz eq meat/meat alternate and 0 oz eq grain; however, the production record indicated it contained 2.0 oz eq meat/meat alternate and 1.0 oz eq grain.

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 accordion.

Please provide a production record that reflects the correct crediting information for chicken nugget. If purchasing a different chicken nugget than what was observed during the review period, please provide the label to support crediting on the production record. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.

17 Production record crediting is inaccurate. Specifically, the hamburger served at lunch on February 6, 2023 credited as 3.75 oz eq meat/meat alternate; however, the production record indicated it contained 2.0 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 accordion.

Please provide a production record that reflects the correct crediting information for hamburger. If purchasing a different beef patty than what was observed during the review period, please provide the label to support crediting on the production record. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.

18 Production record crediting is inaccurate. Specifically, the beef stew served at lunch on February 9, 2023 credited as 3.25 oz eq meat/meat alternate; however, the production record indicated it contained 2.0 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 accordion.

Please provide a production record that reflects the correct crediting information for beef stew. If purchasing a different beef patty than what was observed during the review period, please provide the label to support crediting on the production record.

Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.

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

No findings.

Other Federal Program Reviews: Afterschool Snack Program

Not applicable.

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2023 if applicable.

Other Federal Program Reviews: Fresh Fruit and Vegetable Program

Not applicable.

		Other re	ederal Program Reviews: Special Milk Program
Not appli	cable.		
		Other Fede	eral Program Reviews: At-Risk Afterschool Meals
Not appli	cable.		
Commer	nts/Recommenda	ations:	
Thank you	ou for your hospi usly together in c	itality, organization	School has completed the administrative review for the 2022-2023 school year on, and sense of urgency during the review process. Your team works utstanding job implementing the National School Lunch Program and School
To stay website	on track with N at https://www.a	SLP requirements  azed.gov/hns/nslp  sses, web-base	are working hard to ensure your students are fed delicious meals in a support nts, check out the NSLP at a Glance Calendar & Monthly Checklist on out p/forms under the Calendars and Checklists tab.  ed training, and how-to guides can be found on ADE's website at
To stay website Training	on track with N at <a href="https://www.a">https://www.a</a> <a href="https://www.a">https://www.a</a> <a href="https://www.a">https://www.a</a>		

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the <a href="School Food Authority Appeal Procedure for the Administrative Review">School Food Authority Appeal Procedure for the Administrative Review</a> 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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