



Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Maricopa County Regional School District

CTD: 07-01-99

Site: Hope College and Career Readiness Academy

Contacts: Laurie King, Superintendent and Dina Cutler, Director of District Projects

Review Date: March 22, 2023

Review Period: February 2022

Programs Reviewed:

☒ National School Lunch

☒ School Breakfast

☐ Afterschool Snack

☐ Fresh Fruit & Vegetable

☐ Special Milk

☐ At-Risk Afterschool Meals

No.	Review Observations & Findings	Technical Assistance Provided	Required Corrective Action
Performance Standard 1: Certification and Benefit Issuance – Critical Area			
1	Multiple applications were certified incorrectly or utilized incomplete information. This contributed toward fiscal action calculations.	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.	<i>Corrections have been made to certification errors. Please describe the process that will be implemented to reduce the amount of errors that occur while determining the eligibility status for each student.</i>
Performance Standard 1: Meal Counting and Claiming – Critical Area			
2	Meal count totals by category for the month of review were not correctly combined and recorded. 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 by eligibility category.</i>
3	Daily edit checks are not being conducted.	The Daily Edit Check Worksheet can be found on ADE's website at on ADE's website at 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 April 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>
Performance Standard 2: Meal Components & Quantities – Critical Area			

4	Quantities observed for lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, the fruit daily requirement of 1 cup was not met Monday-Friday. Additionally, the weekly requirement of 5 cups of fruit was not met. This was determined not to be a repeat finding from the previous cycle and did not contribute 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 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 daily and weekly fruit quantities meet minimum amounts required by the meal pattern for lunch. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.</i>
5	Quantities observed for lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, the M/MA daily requirement of 2 oz eq was not met on Friday (served only 1.75 oz eq). Additionally, the weekly requirement of 10 oz eq M/MA was not met. This was determined to not be a repeat finding from the previous cycle and did not contribute 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. 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 and weekly M/MA quantities meet minimum amounts required by the meal pattern for lunch.</i>

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

No findings.

Meal Access & Reimbursement: Certification and Benefit Issuance

Not applicable.

Meal Access & Reimbursement: Verification

Not applicable.

Meal Access & Reimbursement: Meal Counting and Claiming

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| 6 A local meal charge policy has not been developed. | Discussed the Unpaid Meal Charge Policy and referred to memos SP 29-2017, SP 29-2017a, SP 23-2017 and HNS 14-2017, which can be found on ADE's website at https://www.azed.gov/hns/memos . | <i>Please provide a copy of the local meal charge policy that will be created.</i> |
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Meal Pattern & Nutritional Quality: Offer Versus Serve

No findings.

Meal Pattern & Nutritional Quality: Meal Components and Quantities

Resource Management

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| 7 The SFA did not provide a copy of the most recently completed Food Service Annual Financial Report with supporting documentation for all amounts reported was not provided. | Discussed that all program documentation, including the Food Service Annual Financial Report and supporting documentation for amounts reported, must be kept on file for a minimum of five years after the final claim is submitted for the fiscal year to which they pertain as is required by Arizona law. | Please provide a copy of the most recently completed Food Service Annual Financial Report with supporting documentation for all amounts reported. Additionally, provide written assurance that this documentation will be kept on file for a minimum of five years. |
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Procurement

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| 8 The SFA did not provide documented procurement procedures. | 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. | Please provide written procurement procedures that are consistent with 2 CFR 200.317 through 2 CFR 200.327. |
| 9 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: Scottsdale Unified School District. | 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. | <i>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.</i> |

10	Small purchase procedures were not in compliance with procurement requirements. Specifically, no solicitation documentation was provided for the following small purchases: Scottsdale Unified School District.	All procurement transactions for the acquisition of property or services required under a Federal award must be conducted in a manner providing full and open competition consistent with the standards of this 2 CFR 200.319 and 2 CFR 200.320. Additionally discussed that non-Federal entities must have written procedures for procurement transactions. These procedures must ensure that all solicitations incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured.	<i>Please provide a written description of solicitation procedures that will be followed prior to making a small purchase including the title of the individual within the SFA responsible for conducting the solicitation for all small 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

11	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>
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General Program Compliance: SFA On-Site Monitoring

Not applicable.

General Program Compliance: Local Wellness Policy

12	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>
13	A plan is not in place to notify the public of the results of the most recent assessment of the implementation of the Local Wellness Policy (LWP), when assessment is conducted.	Discussed requirement to make the most recent assessment available to the public. Also discussed feasible means for notifying the public of the results of the most recent assessment on the implementation of the LWP. The USDA's Local Wellness Policy Outreach Toolkit can be found at https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit/ .	<i>Please provide a written plan for how the public will be notified of the results of the most recent assessment of the implementation of the LWP.</i>

General Program Compliance: Competitive Food Services

Not applicable.

General Program Compliance: Professional Standards

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| 14 The School Nutrition Program Directors 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> |
| 15 The School Nutrition Program Directors 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.</i> |

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

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| 16 A written food safety plan has not been developed. | Discussed required components of a food safety plan and resources available on ADE's website at https://www.azed.gov/hns/nslp/forms under the Food/Health Safety accordion. | <i>Please provide a copy of a written food safety plan.</i> |
| 17 Documentation was not maintained to support that the school received two food safety inspections from the local health department each school year, or that the school requested two food safety inspections each year from the local health department. | Discussed that each site operating must obtain two food safety inspections from the local health department per school year or maintain documentation to show that two food safety inspections were requested from the local health department each school year. | <i>Please provide a written description of how you will ensure that two food safety inspections from the local health department will be obtained each school year.</i> |

18	Temperature logs for food storage areas are not being maintained.	Discussed requirements for maintaining food storage area temperature logs, sample templates, and who would be responsible. Temperature logs for food storage areas must be maintained for 6 months. Monitoring forms can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Food/Health Safety accordion. Additionally, discussed 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 a copy of the temperature log that will be used for food storage areas as well as written assurance that logs will be kept daily and maintained on-file for 6 months.</i>
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General Program Compliance: Reporting and Recordkeeping

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

19	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>
20	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. Summer feeding locations can be found at https://www.azhealthzone.org/ .	<i>Please provide a description of how households will be notified of the availability of the SFSP prior to the end of the school year and written assurance that this will occur. If you do not plan to operate the SFSP and no other entities reasonably close to your site operate the SFSP, please provide a description of other community resources that will be provided to households prior to the end of the school year.</i>

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 on completing the Administrative Review! Thank you for your cooperation during this process.

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	\$171.43
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$510.74

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by June 5, 2023 to Berenice Camacho Castaneda, Berenice.Camachocastaneda@azed.gov.

Reviewer Signature

Date

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

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