



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Cochise Elementary District

CTD: 02-03-26

Site: Cochise Elementary School

Contacts: Karl Uterhardt, Superintendent and David Brown, Food Service Manager

Review Date: May 17, 2023

Review Period: April 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, during lunch on April 20, 2023; 5/8 cup of vegetables were served when 3/4 cup of vegetable is required daily. 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., increasing vegetable serving). 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. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents). | <i>Please provide a written description of the changes that have been made to ensure that daily vegetable quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.</i> |
|---|--|--|--|

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

- | | | | |
|---|---|--|---|
| 2 | Daily edit checks are not being conducted. Specifically, the SFA did not provide documentation. | 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 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. | 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. |
|---|---|--|---|

Meal Pattern & Nutritional Quality: Offer Versus Serve

Not Participating.

Meal Pattern & Nutritional Quality: Meal Components and Quantities

- | | | | |
|---|---|--|--|
| 3 | Signage which explains what constitutes a reimbursable meal was not displayed to students at lunch. | Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. | Corrections made on-site, no further action required at this time. |
|---|---|--|--|

Resource Management

- | | | |
|--|---|--|
| 4 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> |
| 5 Documentation was not provided to support the usage of Supply Chain Assistance funds. | Discussed that the attestation statement signed by the SFA detailed that the SFA will use Supply Chain Assistance (SCA) funds only for purchasing unprocessed or minimally processed domestic food products and that SFAs are required to maintain purchasing and other related records for review and audit purposes. Referred to SP 03-2022: Allocation of Supply Chain Assistance (SCA) Funds to Alleviate Supply Chain Disruptions in the School Meal Programs located on ADE's website at https://www.azed.gov/hns/memos . | <i>Please provide documentation demonstrating how the \$13,221.24 of Supply Chain Assistance funds were spent.</i> |

Procurement

- | | | |
|---|---|--|
| 6 The SFA did not provide written codes of conduct for procurement within the program. | Discussed that non-Federal entities must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award, and administration of contracts. | <i>Please provide written codes of conduct that are consistent with 2 CFR 200.318.</i> |
| 7 Reviewer could not determine whether procurement was in compliance with the requirements for the appropriate threshold. Specifically, the SFA did not provide documentation to support that small purchase procurements were within the Simplified Acquisition Threshold. | Discussed that when the value of the procurement for property or services under a Federal financial assistance award exceeds the Simplified Acquisition Threshold, or a lower threshold established by a non-Federal entity, formal procurement methods are required. Formal procurement methods (Invitations for Bid and Requests for Proposal) require following documented procedures and public advertising per 2 CFR 200.320(b). | <i>Please provide a written description of procurement procedures that will be followed when determining what type of procurement will be conducted. Additionally, please provide written assurance that all records will be maintained for 5 years.</i> |

| | | | |
|----|---|--|---|
| 8 | Small purchase procedures were not in compliance with procurement requirements. Specifically, insufficient documentation was provided to support that price or rate quotations were obtained from an adequate number of qualified sources for the following small purchases: no supporting vendor documentation provided. | 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. Additionally, please provide written assurance that all records will be maintained for 5 years.</i> |
| 9 | Small purchase procedures were not in compliance with procurement requirements. Specifically, no solicitation documentation was provided for the following small purchases: no supporting vendor documentation provided. | Discussed that 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> |
| 10 | The SFA did not maintain records sufficient to detail the significant history of the procurement for small purchases. Specifically, insufficient evaluation and award documentation was maintained for the following small purchases: no supporting vendor documentation provided. | 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 of the evaluation and award will be maintained for all small purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.</i> |

General Program Compliance: Civil Rights

| | | | |
|----|---|--|--|
| 11 | The USDA nondiscrimination statement used on program materials is not the most current USDA statement. | Discussed where to find nondiscrimination statement on ADE's website at https://www.azed.gov/hns/civilrights and whether long or short statement would be most appropriate. | <i>Corrections made on-site, no further action required at this time.</i> |
| 12 | The public/media release was not provided to local media, the unemployment office and local employers considering large layoffs. Specifically, the SFA did not provide documentation. | 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/nsfp/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> |

General Program Compliance: SFA On-Site Monitoring

Not Applicable.

General Program Compliance: Local Wellness Policy

- | | | | |
|----|--|---|--|
| 13 | The review and update of the Local Wellness Policy (LWP), is not occurring nor is documentation being kept on file to support this. Specifically, the SFA did not provide documentation. | 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> |
| 14 | 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. Specifically, the SFA did not provide documentation. | 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. 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

Not Applicable.

General Program Compliance: Professional Standards

- | | | |
|---|--|---|
| 15 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. Specifically, the SFA did not provide documentation. | 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> |
| 16 Professional Standards training hours are not being tracked on an annual basis. Specifically, the SFA did not provide documentation. | 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. | <i>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.</i> |
| 17 Employees outside of the School Nutrition Program whose responsibilities assist in the operation of the NSLP have not received applicable training. Specifically, the administrative assistant processes household applications and did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed. Specifically, the SFA did not provide documentation. | Discussed 4 hour training requirement, employees' job duties and applicable trainings that could be provided and feasible timeline. 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 these employees will receive.</i> |

General Program Compliance: Water

No Findings.

General Program Compliance: Food Safety, Storage and Buy American

| | | | |
|----|---|---|---|
| 18 | 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>Please provide a photo demonstrating that the most recent food safety inspection report has been posted in a location where the program participants can view it. Additionally, please specify where the report has been posted.</i> |
| 19 | 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>Corrections made on-site, no further action required at this time.</i> |

General Program Compliance: Reporting and Recordkeeping

| | | | |
|----|--|---|---|
| 20 | Production record crediting is inaccurate. Specifically, bean and cheese burrito served at lunch on April 18, 2023 credited as 2.00 oz eq Meat/Meat Alternate; however, the production record indicated it contained 1.50 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 https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. | <i>Please provide a production record that reflects the correct crediting information for bean and cheese burrito. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i> |
| 21 | Production record crediting is inaccurate. Specifically, pizza served at lunch on April 20, 2023 credited as 1/8 cup vegetable; however, the production record indicated it contained 1/4 cup vegetable. | 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 https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. | <i>Please provide a production record that reflects the correct crediting information for pizza. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i> |
| 22 | Production records for lunch on April 19, 20 and 21, 2023 were not completed correctly. The specifics of fruit offered was not indicated. | Discussed required sections of production records. Production Record Templates can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. The 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 records for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years. Additionally, the certificate of completion of Production Record Overview must be provided.</i> |
| 23 | Production records for lunch on April 21, 2023 were not completed correctly. The specifics of milk type/varieties offered was not indicated. | Discussed required sections of production records. Production Record Templates can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. The 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 records for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years.</i> |

24 Production records for lunch were not completed correctly. The milk type/varieties offered are combined and not separated.

Discussed required sections of production records. Production Record Templates can be found on ADE's website at

<https://www.azed.gov/hns/nsip/forms> under the Menu Planning accordion. The Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at <https://www.azed.gov/hns/nsip/training> under the Online Training Library accordion.

Please provide copies of completed lunch production records for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years.

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

No Findings.

Other Federal Program Reviews: Afterschool Snack Program

Not Participating.

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 Participating.

Other Federal Program Reviews: Special Milk Program

Not Participating.

Other Federal Program Reviews: At-Risk Afterschool Meals

Not Participating.

Comments/Recommendations:

Congratulations! Cochise Elementary District has completed the administrative review for the 2022-2023 school year. Thank you for your hospitality during the review process. Your team works together in order to implement the School Nutrition Programs. It is evident that you are working hard to ensure your students are fed healthy, delicious meals in a supportive environment.

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 |
| <input checked="" type="checkbox"/> No- NSLP | <input type="checkbox"/> Yes- NSLP | \$138.51 |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by August 7, 2023 to Joyce Benally at Joyce.Benally@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.

Tom Horne, Superintendent of Public Instruction
1535 West Jefferson Street • Phoenix Arizona 85007 • www.azed.gov
"We are a service organization committed to raising academic outcomes and empowering parents."

This institution is an equal opportunity provider.