



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Parker Unified School District
CTD: 15-02-27
Site: Le Pera Elementary School

Contacts: Brad Sale, Superintendent and Joanna Hermes, Assistant Superintendent

Review Date: November 15, 2023

Review Period: October 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
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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	<p>Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, only 1/2 cup vegetable was served at lunch on October 12, 2023 and October 13, 2023 when 3/4 cup vegetable is required to be served daily. This was not determined to be a repeat finding from the previous cycle and did not contribute 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. 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).</p>	<p><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.</i></p>
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<p>2 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, only 7 oz eq weekly grains were served at breakfast during the week of review when 8 oz eq grains is required to be served weekly. This was not determined to be a repeat finding from the previous cycle and did not contribute 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 Breakfast 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 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).</p>	<p><i>Please provide a written description of the changes that have been made to ensure that weekly grain quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Breakfast Menu must be submitted.</i></p>
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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

<p>3 The verification sample size used was not correct based on the number of applications eligible for verification. Specifically, 11 applications should have been verified, but 14 were actually verified.</p>	<p>Discussed correct calculation of sample size and which applications are subject to verification. Discussed attending ADE's Drop-in Workshop: Preparing for Verification. Referred to Verification Sample Size Calculator and Online Training: Verification Review found on ADE's website at https://www.azed.gov/hns/nslp/training. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion.</p>	<p><i>Please provide written procedures for how the verification sample size will be determined in the future.</i></p>
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Meal Access & Reimbursement: Meal Counting and Claiming

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| 4 Daily edit checks are not being conducted appropriately. Specifically, the attendance factor on the daily edit check does not match the attendance factor on the monthly reimbursement claims. | 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 most recently submitted claim month. 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> |
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Meal Pattern & Nutritional Quality: Offer Versus Serve

No Findings.

Meal Pattern & Nutritional Quality: Meal Components and Quantities

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| 5 Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast. | 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. | <i>Please provide the sign that will be displayed to students that demonstrates what constitutes a reimbursable meal at breakfast. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i> |
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Resource Management

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| 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, including the exact formula used to price adult meals. Additionally, please submit supporting documentation which reflects that prices have been increased to the appropriate level.</i> |
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7 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 \$81,047.46 of Supply Chain Assistance funds were spent.</i>
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Procurement

8 The SFA did not maintain oversight to ensure that contractors performed in accordance with the terms, conditions, and specifications of their contracts or purchase orders for the following small purchases: Republic Services and AZ School Alliance.	Discussed that non-Federal entities must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.	<i>Please provide a written description of the processes implemented to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.</i>
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General Program Compliance: Civil Rights

9 The USDA nondiscrimination statement was not printed on appropriate program materials. Specifically, the unpaid meal charge policy.	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>Please provide an updated program material with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i>
10 The "And Justice for All" poster displayed was an outdated version of the "And Justice for All" poster.	Discussed USDA guidance states that the "And Justice for All" poster must not be printed on paper in a size smaller than 11 x 17 inches. Referred to HNS 08-2019 USDA Nondiscrimination And Justice for All Poster Clarification.	<i>Corrected on site. No further action is required.</i>

General Program Compliance: SFA On-Site Monitoring

No Findings.

General Program Compliance: Local Wellness Policy

No Findings.

General Program Compliance: Competitive Food Services

Not Applicable.

General Program Compliance: Professional Standards

- 11 The School Nutrition Program Manager did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed. Discussed 10 hour training requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at <https://www.azed.gov/hns/nslp/training/>. 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 the School Nutrition Program Manager 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.*
- 12 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. *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.*
- 13 Professional Standards training hours are not being tracked on an annual basis. Referred to USDA's Professional Standards Training Tracker Tool and discussed requirements for tracking. - OR- 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 -OR- Discussed creating their own training tracker with all required information. 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.*

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| 14 | Part-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 4 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 Part-time School Nutrition Program staff are registered for.</i> |
| 15 | Professional Standards training hours are not being adequately tracked. Specifically, there is no comprehensive tracking system in place. Employee trainings are received through a variety of sources (in person and through multiple software programs) and while these records are kept separately there is no system to combine trainings and ensure that hours are met per employee annually. | Discussed feasibility of different tracking methods for the school year. Suggested creating their own training tracker with all required information or upgrading current software system which does provide a sufficient tracking report. 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 a written description of how Professional Standards training hours will be tracked and utilized to ensure that all School Nutrition Program staff meet their training requirements.</i> |
| 16 | Employees outside of the School Nutrition Program whose responsibilities assist in the operation of the NSLP/SBP have not received applicable training. Specifically, there are 4 non-school nutrition employees who have responsibilities related to the program who have not received ay training. | 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

No Findings.

General Program Compliance: Reporting and Recordkeeping

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| 17 | Production record crediting is inaccurate. Specifically, Pop tart served at Breakfast on 10/11/2023 credited as 0 cups fruit; however, the production record indicated it contributed towards the fruit component. | 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 Pop tart. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i> |
| 18 | Production record crediting is inaccurate. Specifically, Cereal Bar served at Breakfast on 10/13/2023 credited as 0 cups fruit; however, the production record indicated it contributed towards the fruit component. | 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 Cereal Bar. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i> |
| 19 | Production record crediting is inaccurate. Specifically, Baked Chips served at Lunch on 10/13/2023 credited as 0 cups vegetable; however, the production record indicated it contributed towards the vegetable component. | 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 Baked Chips. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i> |

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 Federal Program Reviews: Special Milk Program

Not Applicable.

Other Federal Program Reviews: At-Risk Afterschool Meals

Not Applicable.

Comments/Recommendations:

Congratulations, Parker Unified School District has successfully completed the Administrative Review for the 2023-2024 school year. Thank you for your cooperation during the review process. Please remember that we have a variety of trainings (in-person and online) to assist you and your staff in operating a successful National School Lunch Program.

To stay on track with NSLP requirements, check out the NSLP at a Glance Calendar & Monthly Checklist on our website at <https://www.azed.gov/hns/nslp/forms> under the Calendars and Checklists tab.

Training: In-person classes, web-based training, and how-to guides can be found on ADE's website at <https://www.azed.gov/hns/nslp/training>.

Fiscal Action Assessed?

<input checked="" type="checkbox"/> No- SBP	<input type="checkbox"/> Yes- SBP	\$0.00
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$0

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by January 12, 2024 to Megan Lynch at Megan.Lynch@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

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