



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Elfrida Elementary District
CTD: 02-04-12
Site: Elfrida Elementary School

Contacts: Veronic Zamora, Cafeteria and Alma Garcia, Lunch Coordinator

Review Date: November 21, 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

1	The site application in CNPWeb indicated that Elfrida Elementary School is operating the At-Risk Afterschool Snack Program when the site is not operating the Afterschool Snack Program.	Discussed steps required to update the site application in CNPWeb to reflect the current practice of not operating the Afterschool Snack Program.	<i>Please resubmit a site application indicating that Elfrida Elementary School is not operating the Afterschool Snack Program. Additionally, please provide written assurance that the site application in CNPWeb will accurately reflect current practices.</i>
2	Multiple applications were certified incorrectly or utilized incomplete information. Specifically, applications were missing adult Social Security Number (SSN) or did not check if no SSN. This did not contribute 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. Step-by-Step Instruction: How to Process Household Applications found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library 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. Additionally, the certificate of completion of Step-by-Step Instruction: How to Process Household Applications must be submitted.</i>

Performance Standard 1: Meal Counting and Claiming – Critical Area

No findings.

Performance Standard 2: Meal Components & Quantities – Critical Area

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| 3 | The following vegetable subgroup was not offered during the review period: Other vegetable subgroups. This was not determined to be a repeat finding from the previous cycle and did not contribute toward fiscal action calculations. | Discussed vegetable subgroup requirements for the age/grade groups served. vegetable Subgroup Quick Guide can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning 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 vegetable subgroups may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents). | <i>Please provide one week of lunch production records which demonstrate compliance with the vegetable subgroups. Additionally, please provide written assurance that moving forward, all menus will be planned to meet the vegetable subgroup requirements. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.</i> |
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Performance Standard 2: Dietary Specifications and Nutrient Analysis – Critical Area

No findings.

Meal Access & Reimbursement: Certification and Benefit Issuance

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| 4 | Meals counted for reimbursement during a field trip are not served through an adequate point of service. Specifically, meals are enter into the POS from list given to the cafeteria prior to the field trip. | Discussed potential procedures that will be implemented, as well as who would be responsible. | <i>Please provide a written description of procedures that have been implemented to ensure that meals served during field trips are counted through an adequate point of service.</i> |
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Meal Access & Reimbursement: Verification

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| 5 | Direct verification was not conducted as a part of the verification process during 2022-2023 school year. Specifically, Direct Verification - Search History does not show that the SFA conducted Direct Verification. | Discussed/showed how to conduct direct verification in ADEConnect CNP Direct Certification/Direct Verification. Referred to Step-by-Step Instruction: How to Conduct Direct Verification in CNP Direct Certification/Direct Verification found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion 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. | <i>Please provide written procedures for conducting direct verification and written assurance that direct verification will be conducted according to requirements on all applications selected for verification. Additionally, the certificate of completion of Step-by-Step Instruction: How to Conduct Direct Verification in CNP Direct Certification/Direct Verification must be submitted.</i> |
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Meal Access & Reimbursement: Meal Counting and Claiming

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| 6 | Daily edit checks are not being conducted. | 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. | <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> |
| | Meals counted for reimbursement during a field trip are not served through an adequate point of service. Specifically, meals are enter into the POS from list given to the cafeteria prior to the field trip. | Discussed potential procedures that will be implemented, as well as who would be responsible. | <i>Please provide a written description of procedures that have been implemented to ensure that meals served during field trips are counted through an adequate point of service.</i> |

Meal Pattern & Nutritional Quality: Offer Versus Serve

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| 7 | Offer versus Serve (OVS) was not implemented properly. Specifically, students were not given the option to decline component or receive a smaller or larger portion of any component. | Provided technical assistance on proper implementation of OVS and discussed with kitchen and point of service staff. Reviewed menu and discussed options for a reimbursable meal under OVS. USDA's Offer Versus Serve Manual, Effective beginning School Year 2015-2016 can be found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion. | <i>Please provide a written description demonstrating how OVS will be implemented properly. Additionally, please provide written assurance that moving forward, OVS will be implemented properly.</i> |
| 8 | Signage which explains what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable was not displayed to students at breakfast/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. | <i>Please provide the sign that has been displayed explaining what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i> |

Meal Pattern & Nutritional Quality: Meal Components and Quantities

No findings.

Resource Management

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| 9 | 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> |
| 10 | PLE Tool or a Comparable Mechanism to assess its need to raise its paid lunch prices for the current school was not completed. | Discussed requirements for PLE, reminded them of PLE Tool and to keep tool on file, as well as any communication with ADE regarding PLE. Provided technical assistance on how to use the PLE Tool. | <i>Please provide a written description of the procedures that will be implemented to ensure the PLE Tool or other appropriate documentation to support compliance with paid lunch equity requirements will be maintained each school year and that paid lunch prices will be increased as calculations require.</i> |
| 11 | Paid lunch prices were not adequately increased as required by the PLE tool. | Discussed requirements for PLE, reminded them of PLE Tool and to keep tool on file, as well as any communication with ADE regarding PLE. Provided technical assistance on how to use the PLE Tool. | <i>Please provide a written description of the procedures that will be implemented to ensure the PLE Tool or other appropriate documentation to support compliance with paid lunch equity requirements will be maintained each school year and that paid lunch prices will be increased as calculations require.</i> |
| 12 | 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> |

14 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.	<i>Please provide written procurement procedures that are consistent with 2 CFR 200.317 through 2 CFR 200.327.</i>
15 Small purchase procedures were not in compliance with procurement requirements. Specifically, no solicitation, evaluation, or award documentation was provided for the following small purchases: Shamrock Foods.	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>
16 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: Shamrock Foods.	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>
17 The SFA did not maintain oversight to ensure that food purchases complied with the Buy American provision for the following small purchases: Shamrock Foods.	Discussed that the non-Federal entity should, to the greatest extent practicable under a Federal award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States. Domestic preferences for procurements must be included in all subawards including all contracts and purchase orders for work or products.	<i>Please provide a written description of the processes implemented to ensure sufficient oversight with Buy American compliance when making small purchases.</i>

General Program Compliance: SFA On-Site Monitoring

Not applicable.

19 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.	<p>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.</p>	<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>
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General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

20 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.	<p>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.</p>	<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>
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| 21 | 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. | <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 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.</i> |
| 22 | 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> |
| 23 | Employees outside of the School Nutrition Program whose responsibilities assist in the operation of the NSLP/SBP have not received applicable training. Specifically, sufficient plans for meeting the requirements have not been developed. | 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

24 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools banana served on 10/3, 10/5, canned mandarin oranges served on 10/4 and canned pineapple served on 11/21 did not document justifying a Buy American exception for each purchase of a non-domestic product.	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 the changes that have been made to procurement procedures to ensure that the requirements of the Buy American Provision are met for each purchase of a non-domestic product.</i>
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General Program Compliance: Reporting and Recordkeeping

25 Production record crediting is inaccurate. Specifically, bagel served at breakfast meal service on October 2, 2023 credited as 2oz grains on product specification; however, the production record indicated it contained 2.3oz grains.	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 bagel. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i>
26 Production record crediting is inaccurate. Specifically, muffin top served at breakfast meal service on October 2, 2023 credited as 1.5oz grains on product information; however, the production record indicated it contained 3.5oz grains.	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 muffin top. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i>
27 Production record crediting is inaccurate. Specifically, banana served at lunch meal service on October 4th and 5th, 2023 credited as 1 cup of fruit on the production record; however, the food buying guide credit 1 whole banana as 1/2 cup of fruit.	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 banana. 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

28 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>
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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 hard work and cooperation during this process. It was a pleasure visiting your school and seeing what a great job all of your staff are doing and the amount of delicious meals being served. You are all doing a wonderful job implementing the School Nutrition Programs and successfully navigating all of the current challenges. Please keep up the great work!

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	0

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **January 21, 2024** to Amy Dixon Banire at Amy.DixonBanire@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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This institution is an equal opportunity provider.