



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Globe Unified District
CTD: 04-02-01
Site(s): Copper Rim Elementary School.

Contacts: Jerry Jennex, Trent Lyon, Craig Hagen

Review Date: November 16, 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

No Findings.

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

No Findings.

Meal Pattern & Nutritional Quality: Offer Versus Serve

No Findings.

Meal Pattern & Nutritional Quality: Meal Components and Quantities

No Findings.

Resource Management

No Findings.

Procurement

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| 1 | 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> |
| 2 | 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> |

General Program Compliance: Civil Rights

No Findings.

General Program Compliance: SFA On-Site Monitoring

No Findings.

General Program Compliance: Local Wellness Policy

No Findings.

General Program Compliance: Competitive Food Services

No Findings.

General Program Compliance: Professional Standards

No Findings.

General Program Compliance: Water

No Findings.

General Program Compliance: Food Safety, Storage and Buy American

<p>3 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) Sun Cup Fruit Juices made in the USA. Contains concentrate from USA, Argentina, Brazil, China, Chile, and/or New Zealand. Additionally, documentation justifying a Buy American exception was not maintained/on file.</p>	<p>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/nsfp/forms under the Operational accordion. Buy American Recorded Webinar and FAQ can be found on ADE's website at https://www.azed.gov/hns/nsfp/training under the Online Training Library accordion.</p>	<p><i>Please provide a written description of the changes that have been made to recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i></p>
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General Program Compliance: Reporting and Recordkeeping

<p>4 The site application in CNPWeb does not accurately reflect the weekly days of operation that were observed on-site.</p>	<p>Advised SFA to update site application in CNPWeb and contact their assigned specialist to let them know of the changes.</p>	<p>Please submit a new site application in CNPWeb that accurately reflects the point of service and/or counting and claiming procedures. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</p>
<p>5 Production records for breakfast did not contain all required sections: Specifically portion serving size is missing.</p>	<p>Discussed required sections of production records. Production Record Templates can be found on ADE's website at https://www.azed.gov/hns/nsfp/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/nsfp/training under the Online Training Library accordion.</p>	<p><i>Please provide copies of completed breakfast production records for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years.</i></p>
<p>6 Records documenting meal pattern contributions were not kept on file for the minimum required 5 years.</p>	<p>Discussed record keeping requirements and timeframe of 5 years.</p>	<p><i>Please provide written assurance that all documents pertaining to the school meal programs will be retained on file for at least 5 years, as is required by Arizona law, as well as a written plan for ensuring that this requirement is met.</i></p>

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| 7 | Recipes provided did not contain all required sections: Amounts are not correctly labeled for Deli Sandwich and potato salad. | Discussed all menu items that contain more than 1 ingredient must have a standardized recipe. Standardized recipes must include the following information: recipe name, recipe number, ingredients and amounts, serving size, recipe yield, preparation instructions, HACCP process, and HACCP instructions. Standardized Recipe Template can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. | <i>Please provide an updated recipe for Deli Sandwich and Potato Salad. Additionally, please provide written assurance that all recipes will be updated with correct units of measurements .</i> |
| 8 | Sufficient documentation to support meal pattern crediting has not been maintained. Specifically, the recipe provided for Chicken BLT Salad contained inconsistent measurements for chicken and cheese. | Discussed all menu items that contain more than 1 ingredient must have a standardized recipe. Standardized recipes must include the following information: recipe name, recipe number, ingredients and amounts, serving size, recipe yield, preparation instructions, HACCP process, and HACCP instructions. Standardized Recipe Template can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. | <i>Please provide an updated recipe for Chicken BLT Salad. Additionally, please provide written assurance that all recipes will be updated with consistent measurements .</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 2024 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

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| <p>9 The site application in CNPWeb does not accurately reflect the current operation of At Risk Supper. SFA is currently not operating At Risk supper program.</p> | <p>Advised SFA to update site application in CNPWeb and contact their assigned specialist to let them know of the changes.</p> | <p>Please submit a new site application in CNPWeb that accurately reflects the point of service and/or counting and claiming procedures. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</p> |
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Comments/Recommendations:

Thank you for your hard work and responsiveness during the review process! Your dedication to serving your students healthy, safe meals is evident. I appreciate the constant communication and your ability to go above and beyond. Keep up the good 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?

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| <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 December 30, 2023 to Sabrina Castaneda at Sabrina.Castaneda@azed.gov.

Reviewer Signature	Date
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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.