



**ARIZONA DEPARTMENT OF
EDUCATION**

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Superior Unified School District
 CTD: 11-02-15
 Site: John F Kennedy School

Contacts: Steve Estatico Superintendent and Jessica Sanchez Food Service Supervisor

Review Date: November 29, 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>The following vegetable subgroup(s) was/were not offered during the review period: Dark Green and Starchy. This was determined to be a repeat finding from the previous cycle and contributed toward fiscal action calculations.</p> <p>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).</p>	<p><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></p>
2	<p>Documentation did not support that all required meal components were offered and served during the review period. Vegetable portions and contributions were missing from Lunch production records for 10/3/23 This contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 8 cents) until sufficient corrective action is received.</p> <p>Discussed requirements for recordkeeping and/or meal pattern requirements for the grade groups served. Discussed specific missing items and suggested changes.</p>	<p><i>Please provide a written description of the changes that will be made in the recordkeeping process to ensure that documentation supports that the meal pattern requirements were met. AND Please provide a written description of the changes that have been made to the menu to bring it into compliance with the meal pattern requirements.</i></p>

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

3	<p>The changes made to the planned menu during the review period were not acceptable substitutions. Sun Chips were substituted for Tator Tots on 10/3/23 this resulted in non-reimbursable meals being counted for reimbursement and contributed toward fiscal action calculations.</p>	<p>Discussed acceptable changes to the menu, importance of ensuring substitutions still allow the meal pattern requirements to be met. The Step-by-Step Instruction: How to Plan a Lunch Menu -AND/OR- 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, milk type AND/OR vegetable subgroups 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 implemented to ensure that any changes made to the planned menu will meet meal pattern requirements. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu.</i></p>
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Meal Access & Reimbursement: Certification and Benefit Issuance

4	<p>Direct certification matches were not conducted according to the proper time frames, which is at least once at or around the beginning of the school year, three months after the initial effort and six months after the initial effort).</p>	<p>Referred to Direct Certification for Assistance Programs section 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. Additionally, used school calendar to plot timeframes for running reports. The NSLP At A Glance Calendar and The Monthly Checklist for School Food Authorities can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Calendar and Checklists accordion.</p>	<p><i>Please provide a written description of the changes that have been implemented to ensure direct certification will be conducted according to the proper time frames. Additionally, please provide written assurance that, moving forward, direct certification will be run according to the prescribed timeframes for all students enrolled.</i></p>
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Meal Access & Reimbursement: Verification

No Findings.

Meal Access & Reimbursement: Meal Counting and Claiming

5	<p>Point of service staff and substitute point of service staff are not being trained on the meal counting and claiming system (including the backup system) on an annual basis.</p>	<p>Discussed the regulation that SFAs are required to conduct training for point of service staff and serving line staff so they can help students select the required food components/food items in the quantities needed for reimbursable lunches and breakfasts. Annual training is required to meet the professional standards requirements.</p>	<p><i>Please provide written procedures that demonstrate how point of service staff and substitute point of service staff will be trained on the meal counting and claiming system on an annual basis. Additionally, please provide written assurance that these procedures will be followed.</i></p>
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6 The site application in CNPWeb does not accurately reflect the point of service and/or counting and claiming procedures that were observed on-site.	Advised SFA to update site application in CNPWeb and contact their assigned specialist to let them know of the changes.	<i>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.</i>
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Meal Pattern & Nutritional Quality: Offer Versus Serve

Not Applicable.

Meal Pattern & Nutritional Quality: Meal Components and Quantities

7 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

No Findings.

Procurement

No Findings.

General Program Compliance: Civil Rights

8 The "And Justice for All" poster was not displayed in a prominent location and was not visible to all program participants.	Discussed requirements of where poster must be placed and where to find a printable "And Justice For All" poster on ADE's website at https://www.azed.gov/hns/civilrights . Referred to HNS 08-2019 USDA Nondiscrimination And Justice for All Poster Clarification.	<i>Corrected on site no further action required.</i>
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General Program Compliance: SFA On-Site Monitoring

9 On-site reviews of the lunch meal counting and claiming procedures for all sites within the SFA are not being conducted each year prior to February 1.	Discussed requirement and where to find a template Internal On-Site Monitoring Form-Lunch of the Meal Counting and Claiming System found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational accordion. Discussed who would be responsible for completing this each year.	<i>Please provide a completed Internal On-Site Monitoring Form of the Meal Counting and Claiming System. Additionally, please provide a written description of the process that has been put in place to ensure that all sites receive an on-site review of the meal counting and claiming procedures each year prior to February 1.</i>
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10 On-site reviews of the breakfast meal counting and claiming procedures for 50% of the sites within the SFA are not being conducted each year prior to February 1.	Discussed requirement and where to find a template Internal On-Site Monitoring Form-Breakfast of the Meal Counting and Claiming System found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational accordion. Discussed who would be responsible for completing this each year.	<i>Please provide a completed Internal On-Site Monitoring Form of the Meal Counting and Claiming System. Additionally, please provide a written description of the process that has been put in place to ensure that 50% of the sites operating breakfast will receive an on-site review of the meal counting and claiming procedures each year prior to February 1.</i>
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General Program Compliance: Local Wellness Policy

11 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.	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>
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General Program Compliance: Competitive Food Services

Not Applicable

General Program Compliance: Professional Standards

12 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.	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>
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| 13 | 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> |
| 14 | Employees outside of the School Nutrition Program whose responsibilities assist in the operation of the NSLP/SBP have not received applicable training. Annual training has not been completed or tracked. | 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. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i> |
| 15 | 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. | <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. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</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 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools or at off-site storage facilities: Sun Cups. Additionally, documentation justifying a Buy American exception was not maintained/on file. | 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 and/or recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i> |

General Program Compliance: Reporting and Recordkeeping

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| 18 Production records for breakfast and lunch provided did not contain all required sections: Specifically, production records used/left over section is not completed adequately. | 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 breakfast and 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> |
| 19 Production records for breakfast and lunch did not contain all required sections: Recipe numbers, Contribution to meal pattern and portion sizes. | 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 breakfast and 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> |

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

Not Applicable

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 type="checkbox"/> No- NSLP | <input checked="" type="checkbox"/> Yes- NSLP | \$466.10 |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by February 2, 2024 to Sabrina Castaneda at Sabrina.Castaneda@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
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