



**ARIZONA DEPARTMENT OF
EDUCATION**

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Winslow Residential Hall Inc.

CTD: 09-27-01

Site: Winslow Residential Hall

Contacts: Sylvia Largo, Homeliving Supervisor and Hannah Mowa, Head Cook

Review Date: April 24, 2024

Review Period: March 2024

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			
1	Multiple applications were certified incorrectly or utilized incomplete information. Specifically, two applications with three participants were approved for free, and applications were missing the last four digits of SSN and the SSN check box was unchecked. 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. Required -OR- Suggested completing the training: 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>
2	Incomes that were the same frequency were all converted to annual.	Discussed that it is not necessary to convert incomes to annual when they are the same frequency. The Step-by-Step Instruction: How to Process Household Applications can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Please provide written procedures for how and when conversion factors will be utilized and written assurance that income conversions will be used appropriately. 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

No findings.

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

No findings.

Meal Access & Reimbursement: Certification and Benefit Issuance

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| 3 | An individual separate from the application approval process has not been designated as the hearing official. | Discussed school official who could be designated. Referred to Hearing Procedure 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. | <i>Please provide the name and title of the individual designated as the hearing official. Additionally, please provide documentation to demonstrate where households are notified of the hearing official.</i> |
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Meal Access & Reimbursement: Verification

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| 4 | The person designated as the confirming official is the same person who makes eligibility determinations. | Discussed requirement for having a designated official for conducting confirmation reviews who is not the same person who determined eligibility. The Online Training: Verification Review 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 the name and title of the individual designated as the confirming official. Additionally, please provide written assurance that the person designated as the confirming official will not be the same person who determines eligibility.</i> |
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Meal Access & Reimbursement: Meal Counting and Claiming

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| 5 | 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 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

No findings.

Resource Management

No findings.

Procurement

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| 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 | 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> |
| 8 | Small purchase procedures were not in compliance with procurement requirements. Specifically, price or rate quotations were not obtained from an adequate number of qualified sources for the following small purchases: Holsum. | 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.</i> |
| 9 | Small purchase procedures were not in compliance with procurement requirements. Specifically, no solicitation, evaluation, or award documentation was provided for the following small purchases: Holsum and Shamrock. | 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, evaluation, and award 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> |

General Program Compliance: Civil Rights

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| 10 | The public/media release was not provided to local media, the unemployment office and local employers considering large layoffs. | 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/nslp/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> |
| 11 | Procedures for receiving and processing complaints alleging discrimination within the school meal programs are not in place. | Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., ADE, Food & Nutrition Services Southwest Regional Office, FNS Office of Civil Rights, or USDA Office of Civil Rights). The SFA's procedures must note whether an allegation is made verbally or in person. The SFA staff member receiving the allegation must transcribe the complaint. The SFA's procedures for receiving a complaint cannot prevent a complaint from being accepted. Additionally, the SFA's procedures must not indicate that they attempt to resolve the complaint themselves nor can the SFA's complaint process be a prerequisite for accepting a complaint. Additional guidance can be found on ADE's website at https://www.azed.gov/hns/civilrights . The Step-by-Step Instruction: How to File a Civil Rights Complaint 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 process and procedures for processing complaints alleging discrimination within FNS School Meal Programs. Additionally, the certificate of completion of Step-by-Step Instruction: How to File a Civil Rights Complaint must be submitted.</i> |

General Program Compliance: SFA On-Site Monitoring

Not applicable.

General Program Compliance: Local Wellness Policy

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| 12 A Local Wellness Policy (LWP) has not been developed. | Discussed preliminary planning, such as who will be named as the designated LWP official and how required stakeholders will be invited to participate in the process. Reviewed handouts and discussed developing a LWP with required elements. Local Wellness Policy resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Local Wellness Policy accordion. 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 plan for development of a Local Wellness Policy. This plan must include who will be designated as the oversight official, who will be invited to participate in the development process and the date by which the policy is expected to be completely developed and adopted. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.</i> |
| 13 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> |

General Program Compliance: Competitive Food Services

Not applicable.

General Program Compliance: Professional Standards

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| 14 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 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. 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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General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

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| 15 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed school for fruit cocktail with ingredients from Indonesia, Malaysia, Thailand and the Philippines; frozen Broccoli, from California blend and Pineapple from Mexico violations. 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 recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i> |
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General Program Compliance: Reporting and Recordkeeping

No findings.

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

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| 16 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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17 Households were not notified of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year.	Discussed methods of notifying families of the availability of the SFSP prior to the end of the school year and determined which was most feasible. Summer feeding locations can be found at https://www.azhealthzone.org/ .	<i>Please provide a description of how households will be notified of the availability of the SFSP prior to the end of the school year and written assurance that this will occur. If you do not plan to operate the SFSP and no other entities reasonably close to your site operate the SFSP, please provide a description of other community resources that will be provided to households prior to the end of the school year.</i>
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Other Federal Program Reviews: Afterschool Snack Program

18 The Afterschool Snack Program (ASP) monitoring review was not conducted within the first four weeks of operation and one additional time during the school year.	Discussed ASP monitoring requirements. A sample ASP monitoring form can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational accordion.	<i>Please provide written assurance that the ASP will be monitored once within the first four weeks of operation and one additional time during the school year, and that documentation to support this will be maintained.</i>
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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

19 The At-Risk Afterschool Meals Site Review Form for Snacks was not completed by February 1st.	Discussed SFAs are required to perform no less than one on-site snack meal service review of the At-Risk Afterschool Meals site by February 1st. The At-Risk Afterschool Meals Site Review Form for Snacks AND/OR At-Risk Afterschool Meals Site Review Form for Meals https://www.azed.gov/hns/afterschool/programforms under the Operational accordion.	<i>Please provide a completed At-Risk Afterschool Meals Site Review Form for Meals. Additionally, please provide a written description of the process that has been put in place to ensure that all sites operating At-Risk Afterschool Meals will receive a review prior to February 1 annually.</i>
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<p>20 Production records do not support that the At-Risk Afterschool Meals served meet meal pattern requirements. Specifically, the other vegetable subgroup was not offered. This was not a repeat finding from the previous cycle and did not contribute toward fiscal action calculations.</p>	<p>Discussed the meal pattern requirements of At-Risk Afterschool Meals. The meal pattern chart can be found on ADE's website at https://www.azed.gov/hns/afterschool under the Meal Pattern accordion. Step-by-Step Instruction: How to Plan a Snack Menu for the Afterschool Care Snack Program OR Step-by-Step Instruction: How to Plan a Supper Menu Using the NSLP Meal Pattern OR Step-by-Step Instruction: How to Plan a Supper Menu Using the CACFP Meal Pattern can be found on ADE's website at https://www.azed.gov/hns/afterschool/trainingforSFAs under the How-To Guides accordion.</p>	<p><i>Please provide copies of completed At-Risk Afterschool Meals production records for 5 consecutive days roduction records which demonstrate compliance with the vegetable subgroups. Additionally, the certificate of completion for Step-by-Step Instruction: How to Plan a Supper Menu Using the NSLP Meal Pattern.</i></p>
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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	\$0.00

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **June 24, 2024** to amy.dixonbanire@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
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