



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Gap Ministries
CTD: 10-27-07

Sites: Pima County - Drexel Heights Community Center, Pima County - Ellie Towne Flowing Wells Community Center, Southern Arizona Community Academy and Splash 11

Contacts: John Hohn, Executive Chef

Review Date: October 22-25, 2024

Exit Conference Date: October 25, 2024

Review Period: September 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
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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 The following vegetable subgroup was not offered during the review period: beans/peas (legumes) subgroup at Splash 11. This was determined to be a repeat finding from the previous cycle and contributed 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.	<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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<p>2 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the daily meat/meat alternate requirement was not met at Splash 11 during lunch for 9-12 on September 14 and 28, 2024; only 1.75 oz eq meat/meat alternate was served 2.0 oz eq meat/meat alternate is required daily for grades 9-12. This was determined to be a repeat finding from the previous cycle and contributed 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.</p>	<p><i>Please provide a written description of the changes that have been made to ensure that daily meat/meat alternate quantities meet minimum amounts required by the meal pattern for grades 9-12.</i></p>
<p>3 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the weekly meat/meat alternate requirement was not met at Splash 11 during lunch for 9-12. Only 11.50 oz eq meat/meat alternate was offered when 12 oz eq is required weekly for grades 9-12. This was determined to be a repeat finding from the previous cycle and contributed 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.</p>	<p><i>Please provide a written description of the changes that have been made to ensure that weekly meat/meat alternate quantities meet minimum amounts required by the meal pattern for grades 9-12</i></p>

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>4 The most recent Verification Summary Report was not accurate. Specifically, the total number of school reported was 4 when the SFA only had one school.</p>	<p>Discussed that Verification Summary Report must reflect actual verification process and results, discussed specific discrepancies. Discussed attending ADE's Drop-in Workshop: Submitting for Verification. 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 a written description of the changes that have been implemented to ensure that the Verification Summary Report will accurately reflect the verification practices and results that occurred.</i></p>
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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.

General Program Compliance: Civil Rights

No findings.

General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy & School Meal Environment

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| 5 | The Local Wellness Policy (LWP) did not contain all required elements. Specifically, the LWP did not contain nutrition standards for all foods and beverages provided, but not sold, to students on the school campus during the school day or policies for food and beverage marketing. | Discussed developing a LWP with nutrition standards for all foods and beverages provided, but not sold, to students. 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 how nutrition standards for all foods and beverages provided to students on the school campus during the school day and policies for food and beverage marketing will be added to the Local Wellness Policy (LWP). The plan should include draft language of the element to be added, who will be involved in updating the LWP and the date the update is expected to be completed. Additionally, provide written assurance that the LWP will be specific to your institution.</i> |
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| <p>6 The required stakeholders are not being permitted to be involved in the development, review, and update of the Local Wellness Policy (LWP). Specifically, students, were not permitted to participate in the development, review, and update of the LWP.</p> | <p>Discussed LEAs must permit participation by the general public and school community (including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators) in the wellness policy process. Guidance on assembling a Local Wellness Policy Team can be found on Team Nutrition's website at https://www.theicn.org/cnss/community-connection/assembling-the-team/. 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.</p> | <p><i>Please provide a written description of how all stakeholders, including students will be permitted to be involved in the development, review, and update of the Local Wellness Policy.</i></p> |
| <p>7 Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the Local Wellness Policy (LWP). Specifically, students, were not made aware of their ability to participate in the development, review, and update of the LWP.</p> | <p>Discussed feasible means of notifying potential stakeholders of their ability to participate. [Note any methods the SFA may have decided to employ] 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.</p> | <p><i>Please provide a written description of how all potential stakeholders, including students, will be made aware of their ability to participate in the development, review, update, and implementation of the LWP.</i></p> |
| <p>8 The recent assessment of the implementation of the Local Wellness Policy (LWP) did not meet the Final Rule requirements. Specifically, the assessment did not measure how the LEA's LWP compares to a model wellness policy or progress made in attaining the goals of the LWP.</p> | <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> | <p><i>Please provide a written plan for conducting an assessment of the implementation of the Local Wellness Policy. 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></p> |

General Program Compliance: Smart Snacks in Schools

Not applicable.

General Program Compliance: Professional Standards

No findings.

General Program Compliance: Water Availability

No findings.

General Program Compliance: Food Safety, Storage and Buy American

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| 9 | The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at Splash 11: banana and cucumber product of Mexico. 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 recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i> |
| 10 | Documentation was not maintained to support that the school received two food safety inspections from the local health department for Splash 11, or that Splash 11 requested two food safety inspections each year from the local health department. | Discussed that each site operating must obtain two food safety inspections from the local health department per school year or maintain documentation to show that two food safety inspections were requested from the local health department each school year. | <i>Please provide written assurance that documentation to show that two food safety inspections were received and/or requested from the local health department Splash 11 will be maintained.</i> |

General Program Compliance: Reporting and Recordkeeping

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| 11 | The sponsor application in CNPWeb indicated that Southern Arizona Community Academy is classified as Charter School and participating in regular NSLP when site is At-Risk Meal Service Center. | Discussed steps required to update the sponsor application in CNPWeb to reflect current practice of site classification. | <i>CNPWeb application has been updated. Additionally, please provide written assurance that the sponsor application in CNPWeb will accurately reflect current practices.</i> |
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| 12 Recipes were not provided for menu items that contain more than 1 ingredient. Specifically, recipes were not provided for the Turkey and cheese sandwich served on September 14 and 28, 2024 or the ham and cheese sandwich served on September 21, 2024 during lunch at Splash 11. | 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 a recipe for Turkey and Cheese and Ham and Cheese sandwiches. Additionally, please provide written assurance that all menu items that contain more than 1 ingredient will have a standardized recipe.</i> |
| 13 Production record is not accurately completed. Specifically, the portion of slice cheese served to grades 9-12 during lunch at Splash 11 was 1 slice; however the production record indicated it the portion size was 1 cup. | Discussed all menu items listed on production records should be completed accurately, including portion size information. | <i>Please provide a production record that reflects the correct portion size information for slice cheese. Additionally, please provide a written description of changes made to ensure the production record is completed accurately.</i> |

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

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| 14 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/freesummermeals/ . | <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

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| 15 The counting system employed does not result in accurate snack counts. Specifically, the month of review claim does not match the meal count documentation for Splash 11. This contributed to fiscal action calculations. | Discussed ways to improve the counting system or alter it to ensure accurate counts are submitted in the claim for reimbursement. | <i>Please provide a written description of the system that will be implemented to ensure accurate snack counts are claimed for reimbursement.</i> |
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Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2025 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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| 16 | <p>The counting system employed does not result in accurate meal counts. Specifically, one day of At-Risk lunch and At-Risk afternoon snack counts were excluded from the total claimed at Southern Arizona Community Academy in September 2024 . Additionally, one day of At-Risk supper counts were excluded from the total claimed at Pima County - Ellie Towne Flowing Wells Community Center in September 2024. This contributed towards fiscal action calculations.</p> | <p>Discussed ways to improve the counting system or alter it to ensure accurate counts are submitted in the claim for reimbursement.</p> | <p><i>Please provide a written description of the system that will be implemented to ensure accurate At-Risk lunch, afternoon snack, and supper counts are claimed for reimbursement.</i></p> |
| 17 | <p>Production records do not support that the At-Risk Afterschool Meals served meet meal pattern requirements. Specifically, the At-Risk lunch served at Southern Arizona Community Academy on September 9, 2024, did not meet the NSLP meal pattern for daily fruit quantities. This contributed to fiscal action calculation.</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/rainingforSFAs under the How-To Guides accordion.</p> | <p><i>Please provide copies of completed At-Risk Afterschool Meals production records for 5 consecutive days for Southern Arizona Community Academy demonstrating sufficient daily fruit quantities. Please provide written assurance that the At-Risk Afterschool Meals meal pattern will be adhered to at all times. Additionally, the certificate of completion for Step-by-Step Instruction: How to Plan a Supper Menu Using the NSLP Meal Pattern.</i></p> |
| 18 | <p>Production records do not support that the At-Risk Afterschool Meals served meet meal pattern requirements. Specifically, the At-Risk lunch served at Southern Arizona Community Academy during the week of review, did not meet the NSLP meal pattern weekly fruit quantities. This contributed to fiscal action calculation.</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/rainingforSFAs under the How-To Guides accordion.</p> | <p><i>Please provide copies of completed At-Risk Afterschool Meals production records for 5 consecutive days for Southern Arizona Community Academy demonstrating sufficient weekly fruit quantities. Please provide written assurance that the At-Risk Afterschool Meals meal pattern will be adhered to at all times.</i></p> |

- 19 Production records do not support that the At-Risk Afterschool Meals served meet meal pattern requirements. Specifically, the At-Risk lunch served at Southern Arizona Community Academy on September 12, 2024, did not meet the NSLP meal pattern daily vegetable quantity. This contributed to fiscal action calculation.
- 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.
- Please provide copies of completed At-Risk Afterschool Meals production records for 5 consecutive days for Southern Arizona Community Academy demonstrating sufficient daily vegetable quantities. Please provide written assurance that the At-Risk Afterschool Meals meal pattern will be adhered to at all times.*

Comments/Recommendations:

Congratulations, Gap Ministries has completed the Administrative Review for the 2024-2025 school year. Thank you, for your cooperation during the review process. Please remember that we have a variety of training 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?

No- SBP Yes- SBP \$0.00
 No- NSLP Yes- NSLP \$227.31

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by December 27, 2024 to Amy Dixon Banire at Amy.DixonBanire@azed.gov. The response must be on organizational letterhead and signed by an authorized representative and must indicate that corrective actions will be implemented SFA-wide.

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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