

# **Health and Nutrition Services Division**

### Administrative Review Summary Report

School Food Authority Name: Bowie Unified District CTD: 02-02-14 Site: Bowie Elementary School

Со	ntacts: Rich Arkanoff, Superintendent and	d Irma Vas	quez, Food Service	
	Review Date: February 20, 2025			
	Exit Conference Date: February 20, 202	5		
	Review Period: January 2025			
	Programs Reviewed:  Image: National S	chool Lunch	School Breakfast	□ Afterschool Snack
	🗌 Fresh Fruit & V	egetable	Special Milk	□ At-Risk Afterschool Meals
No			nical Assistance Provided	Required Corrective Action
			ertification and Benefit Issuance	
1	Student eligibility certification was incorrectly determined. Specifically, an incomplete application certified two students for free benefits; three applications used incorrect household totals; and one student was extended benefits without supporting documentation. This contributed toward fiscal action calculations.	corrective a Application on Income Categorica Determinin Eligible Ap Eligibility M ADE's web https://www Guidance I completing Instruction: Application https://www	action. Referred to Processing is, Reviewing Applications Based , Assessing Completeness of illy Eligible Applications, ig Eligibility for Categorically plications sections in USDA's lanual for School Meals found on	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.
2	Direct certification matches were not correctly certified. Specifically, two students matched with an eligible program through direct certification but were categorized as paid based the submitted income application. This contributed toward fiscal action calculations.	who match Determinin Eligible Ap Eligibility M ADE's web https://www	g Eligibility for Categorically plications section in USDA's lanual for School Meals found on	Corrections have been made to certification errors. Please describe the process that will be implemented to reduce the amount of errors that occur while certifying students who match in direct certification for free or reduced-price benefits.

### Performance Standard 1: Meal Counting and Claiming – Critical Area

3 Meal count totals by eligibility category were Discussed how current system allowed for not correctly combined and recorded at breakfast and lunch during the review period. This was deemed a non-systemic error and did not contributed toward fiscal action calculations.

this to happen and potential changes that

Please provide a written description of changes to the system that have been could be made to ensure it doesn't continue. implemented to ensure that meal count totals by eligibility category are correctly combined and recorded, including the date of implementation.

## Performance Standard 2: Meal Components & Quantities – Critical Area

	i enomiance of	lanuaru z. Mear components & Quantities	
4	The following product could not be credited towards the meal pattern due to insufficient documentation: Beef Tacos. Without sufficient documentation, the reviewer was unable to determine if meat/meat alternate quantity requirements were met at lunch on January 14, 2025. This was a repeat finding from the previous cycle and therefore didcontribute toward fiscal action calculations.	Discussed requirements regarding standardized recipe sheets, nutrition labels, and ingredient lists that should be maintained to support the served menu. Additionally, processed product documentation and provided examples. USDA Food Fact Sheets can be found on USDA's website at https://www.fns.usda.gov/fdd/nslp-usda- foods-fact-sheets/. The CN Labels and Product Formulation Statements Recorded Webinar & Webinar Slides 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 may result in fiscal action.	Please provide a standardized recipe sheet and the supporting nutrition information for the Beef Tacos. Additionally, please provide written assurance that a products will not be credited towards the meal pattern without proper crediting documentation.
5	Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 0.75 oz eq of meat/meat alternate was served on January 15, 2025, when 1 oz eq is required daily at lunch for grades K-8. This was determined to be a repeat finding from the previous cycle and contributed toward fiscal action calculations.	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.). 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. 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides 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 may result in fiscal action.	Please provide a written description of the changes that have been made to ensure that daily meat/meat alternate quantities at lunch meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.

6	Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 3 oz eq of meat/meat alternate was served on January 13-16, 2025 when 7 oz eq is required weekly at lunch for grades K-8. This was determined to be a repeat finding from the previous cycle and contributed toward fiscal action calculations	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.). 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. 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides 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 may result in fiscal action.	Please provide a written description of the changes that have been made to ensure that weekly meat/meat alternate quantities at lunch meet minimum amounts required by the meal pattern.
7	Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 4 oz eq of grains were served on January 13-16, 2025 when 6.5 oz eq is required weekly at lunch for grades K-8. This was determined to be a repeat finding from the previous cycle and contributed toward fiscal action calculations.	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.). 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. 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides 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 may result in fiscal action.	Please provide a written description of the changes that have been made to ensure that weekly grain quantities at lunch meet minimum amounts required by the meal pattern.

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

No Findings.

# Meal Access & Reimbursement: Certification and Benefit Issuance

8 The benefit issuance document is not being Discussed potential changes that can be updated in a timely manner to reflect changes in eligibility, new students, transfer students, or withdrawn students. Specifically, one withdrawn student remained on the document and there was a eligibility status within 10 days of receiving discrepancy between the number of Free and Reduced-Price students listed and the amount reported on the claim.

made to system to ensure that updates are made in a timely manner. Additionally, discussed that schools must make a determination and notify the household of its timely manner. Additionally, please provide the application. The Step-by-Step Instruction: How to Create a Benefit Issuance Document (BID) can be found on ADE's website at https://www.azed.gov/hns/nslp/training

under the Online Training Library accordion.

Please provide written procedures for updating the benefit issuance document to reflect changes in eligibility, new students, transfer students, or withdrawn students in a the certificate of completion for Step-by-Step Instruction: How to Create a Benefit Issuance Document (BID) must be submitted.

	Μ	eal Access & Reimbursement: Verification	
9	The SFA did not have sufficient documentation to support follow-up attempts to households that did not adequately respond to the request for verification.	Discussed requirement for SFAs to document contact was attempted in writing (mail or email) or by telephone or text message. Referred to Verification Tracking Form found at https://www.azed.gov/hns/nslp/forms under the Calendars and Checklists 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.	Please provide written procedures that will be implemented when following up with households that did not adequately respond to the request for verification, including how it will be documented.
10	Verification procedures were not followed correctly. Specifically, the SFA did not update the benefit issuance document to reflect eligibility status changes as the result of verification.	Discussed that an increase in benefit status should be reflected on the benefit issuance document no later than 3 operating days after verification and an decrease in benefit status should be reflected on the benefit issuance document 10 calendar days after verification. Referred to ADE's Verification Tracking Form and Online Training: Verification Review on ADE's website at http://www.azed.gov/hns/nslp/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.	Please provide written procedures for ensuring student eligibility status will be updated on the benefit issuance document in the proper time frame.
11	Verification activities were not completed by November 15. Specifically, households were not notified of the results of verification until December 18, 2024.	Discussed requirement for completion of verification activities by November 15, including the notification of verification results. Referred to Verification Best Practices Calendar and Online Training: Verification Review found at https://www.azed.gov/hns/nslp/forms under the Calendars and Checklists accordion.	Please provide written assurance that verification will be completed by November 15 each year, as well as the steps that will be taken to ensure this requirement is adhered to.

### Meal Access & Reimbursement: Meal Counting and Claiming

12 Daily edit checks are not being conducted appropriately. Specifically, the attendance factor was incorrect and the worksheet was incomplete.	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.	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
--	--	---

# Meal Pattern & Nutritional Quality: Offer Versus Serve

13 Cafeteria staff have not been properly trained on Offer versus Serve (OVS) meal service.	Discussed that schools are expected to conduct training for point of service 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. Additionally discussed that this could be included in the annual training requirements for program staff. Referred to USDA's Offer Versus Serve Manual located on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion.	Please provide a written description of how cafeteria staff will be trained on OVS. Additionally, the certificate of completion of Meal or No Meal and Meal or No Meal - Breakfast Edition must be submitted.

# Meal Pattern & Nutritional Quality: Meal Components and Quantities

No Findings.

# **Resource Management**

_		0	
-	14 Meals served to teachers, administrators,	Discussed ways to determine adult meal	Please provide a written description of the
	custodians, and other adults were not priced	prices which included a per meal cost	steps which have been taken to increase
	so that the adult payment in combination	analysis and pricing utilizing the Adult Meal	adult meal prices, including the exact formula
	with any per-lunch revenues from other	Pricing Tool. For Pricing Sites: the paid meal	used to price adult meals. Additionally,
	sources designated specifically for the	price plus the amount of reimbursement	please provide documentation demonstrating
	support of adult meals (such as State or	received for a paid meal plus the per meal	the prices have been increased to the
	local fringe benefit or payroll funds, or	value of entitlement and bonus commodities	appropriate level and documentation
	funding from voluntary agencies) was	for pricing programs. Referred to Adult Meal	supporting that the difference between adult
	sufficient to cover the overall cost of the	Pricing Tool located on ADE's website at	meal price charged and the required adult
	meal. Specifically, an outdated adult meal	https://www.azed.gov/hns/nslp/forms/ under	meal prices throughout the month of January
	pricing tool that utilized reimbursements	the Financial accordion.	2025 of non-Federal funds were used to
	from school year 2020-2021 resulting in		cover the price of serving adult meals served
	\$2.85 being charged for adult breakfast		during the review period of non-Federal funds
	when a minimum of \$2.89 should have been		were used to cover the price of serving adult
	charged.		meals served during the review period.

15 Documentation was not provided to support Discussed that the attestation statement nor was a plan for usage of the funds provided.

the usage of Supply Chain Assistance funds signed by the SFA detailed that the SFA will how the \$13,947.08 of Supply Chain use Supply Chain Assistance (SCA) funds only for purchasing unprocessed or minimally processed domestic food products and that SFAs are required to maintain purchasing and other related records for review and audit purposes. Referred to SP 03-2022: Allocation of Supply Chain Assistance (SCA) Funds to Alleviate Supply Chain Disruptions in the School Meal Programs located on ADE's website at https://www.azed.gov/hns/memos.

Please provide documentation demonstrating Assistance funds were spent or a plan on how the funds will be spent.

### No Findings.

### General Program Compliance: SFA On-Site Monitoring

**General Program Compliance: Civil Rights** 

16	On-site reviews of the breakfast and lunch	Discussed that every school year, each	Please provide a completed Internal On-Site
	meal counting and claiming procedures for	school food authority with more than one	Monitoring Form of the Meal Counting and
	all sites within the SFA are not being	school shall perform no less than one on-	Claiming System for breakfast and lunch at
	conducted each year prior to February 1.	site review of the counting and claiming	Bowie Elementary School. Additionally,
	Specifically, the SFA indicated on-site	system for each school under its jurisdiction	please provide a written description of the
	monitoring is not a routine practice and had	prior to February 1. The Internal On-Site	process that has been put in place to ensure
	not occurred prior to the review notification.	Monitoring Form - Lunch template can be	that all sites receive an on-site review of the
	Additionally, the submitted monitoring forms	found on ADE's website at	meal counting and claiming procedures at
	were completed and signed on February 3,	https://www.azed.gov/hns/nslp/forms under	lunch each year prior to February 1.
	2025.	the Operational accordion. Discussed who	
		would be responsible for completing this	
		each year.	

#### **General Program Compliance: Local Wellness Policy**

Discussed requirement to complete an	Please provide a written plan for conducting	
assessment once every three years, at a	an assessment of the implementation of the	
minimum. The assessment must measure	Local Wellness Policy. This plan must include	
how the LEA is complying with their Local	who will be designated as the oversight	
Wellness Policy, how the LEA's Local	official, who will be invited to participate in the	
	assessment process, and the date by which	
	the assessment is expected to be completed.	
	,	
•		
, ,		
0		
under the Online Training accordion.		
	Discussed requirement to complete an assessment once every three years, at a minimum. The assessment must measure	

**General Program Compliance: Competitive Food Services** 

18 Foods served to students in grades K-8 during the school day do not meet Smart Snacks Standards. Specifically, the Lay's potato chips in which the caloreis from total fat exceed 35%. Discussed Smart Snacks requirements for grades K-8 including that all foods and beverages sold or served to students during the school day (defined as the midnight before to 30 minutes after the end of the school day) must meet Smart Snack requirements. The Alliance for a Healthier **Generation Smart Snacks Product** Calculator can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational accordion. Smart Snacks Summary Chart and additional resources can be found on USDA's website at https://www.fns.usda.gov/schoolmeals/tools-schools-focusing-smart-snacks. The Online Course: Smart Snacks and Competitive Foods Standards in Arizona can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.

Please provide written procedures for assessing whether a product meets Smart Snacks Standards and written assurance that Lay's Classic Potato Chips will no longer be served or sold during the school day. Additionally, the certificate of completion of Online Course: Smart Snacks and Competitive Foods Standards in Arizona must be submitted.

### General Program Compliance: Professional Standards

or re wi	5	Discussed requirement and feasibility for attending an available certification training within current school year. Food Safety Online Training Library can be found on ICN's website at https://theicn.org/icn- resources-a-z/food-safety/.	Please provide the expected date that food safety certification training will be completed by the School Nutrition Program Director.
m	aid Part-Time Student Workers have not et the training requirements for the current chool year and sufficient plans for meeting e 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.	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 Student Workers are registered for. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.

21 Employees outside of the School Nutrition Program with responsibilities that include duties related to the operation of the School Nutrition Program have not received applicable training nor has sufficient training been planned. Specifically, the business manager with responsibilities of certification Breakfast Program can be found on ADE's and benefit issuance and the principal occasionally operating the point of sale to collect meal counts.

Discussed 4 hour training requirement, employee's job duties, and applicable trainings that could be provided and feasible name, date and content information of timeline. Training Curriculum for Arizona Child Nutrition Professionals Operating the National School Lunch and School 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.

Please provide the expected date that the training requirement will be met as well as the trainings that employees outside of the School Nutrition Program with responsibilities related to the operation of the School Nutrition Programs will receive.

**General Program Compliance: Water** 

No Findings.

#### General Program Compliance: Food Safety, Storage and Buy American

22 The following products observed at Bowie	Discussed that funds used from the	Please provide a written description of the
Elementary were in violation of the Buy	nonprofit school food service account must	changes that have been made to
American Provision (i.e., were non-	be used to procure food products that	procurement and/or recordkeeping
domestic) and documentation justifying a	comply with the Buy American Provision.	procedures to ensure that the requirements
Buy American exception were not	Additionally discussed procedures for	of the Buy American Provision are met.
maintained on file: Mini Watermelon from	documenting a Buy American exception.	
Mexico and Grapes from Chile.	Referred to SP38-2017, Buy American	
	Webinar and FAQ. 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.	

#### General Program Compliance: Reporting and Recordkeeping

23 Production record crediting is inaccurate. Specifically, the following items did not reflect correct crediting information: Grilled Chicken.	Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Additionally discussed that crediting information is not a required element of a production record and therefore is not required to be included on the production record. Crediting resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Manu Planning accordion	Please provide a written description of changes made to ensure crediting is correctly reflected on production records. If the operation chooses not to include the optional crediting information on the production record moving forward, please provide production records for 5 consecutive days demonstrating that it is no longer included.
	the Menu Planning accordion.	

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

24 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 Program (SFSP) prior to the end of the school year and determined which was most (SFSP) prior to the end of the school year, feasible. Summer feeding locations can be found at https://www.azhealthzone.org/.

Please provide a written description of how the availability of the Summer Food Service households will be notified of the availability of the Summer Food Service Program including the documentation that will be used for the notification. Additionally, please provide written assurance that this will occur at the end of each school year.

### **Other Federal Program Reviews: Afterschool Snack Program**

Not Applicable.

### 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

Not Applicable.

Comments/Recommendations:

Congratulations! Bowie Unified District has completed the administrative review for the 2024-2025 school year. It is recommended that trainings in Certification and Benefit Issuance, Verification, Meal Components and Quantities are completed throughout the year. It is also recommended that internal compliance checks are conducted periodically in these critical areas to maintain program integrity. Thank you for your patience and cooperation during the review process.

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 \$121.94 No- NSLP \$706.10 ☑ Yes- NSLP Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by May 30, 2025 to Jackie Rodriguez at Jackie.Rodriguez@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

Program Director Signature Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the <u>School Food Authority Appeal Procedure for the Administrative Review</u> 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 "We are a service organization committed to raising academic outcomes and empowering parents."

This institution is an equal opportunity provider.