

# **Health and Nutrition Services Division**

Administrative Review Summary Report					
School Food Authority Name: S	Santa Cruz Catho	lic School			
CTD: 10-20-08					
Site(s): Santa Cruz Catholic School					
Contacts: Josie Noriega, School	I Food Authority				
Review Date: April 17, 2024					
Review Period: March 2024	1				
Programs Reviewed:   National Schoo		l Lunch	☑ School Breakfast	☐ Afterschool Snack	
☐ Fresh Fruit & Veget		able	☐ 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 Three applications (3 students) were certified incorrectly. Specifically, the reported income did not qualify for free or reduced-price meal benefits and were certified for reduced-price meal benefits. Provided TA on strategies to reduce errors when certifying household applications. This contributed towards fiscal action calculations		Discussed errors found and required		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.	
	Parformanca Stan	dard 1: Moal (	Counting and Claiming –	Critical Area	
No findings	eriormance stall	uaiu i. Wiedi (	- Counting and Claiming -	Official Alea	
140 ilifulitys					
Pe	rformance Stand	ard 2: Meal Co	omponents & Quantities	– Critical Area	

Page 1 of 10

2 Quantities observed on the during the review period did not meet minimum amounts required by the meal pattern. Specifically, the grain component at lunch credited 7.5 oz eg of the required 8 oz eq quantity. This was determined to be a repeat finding from the previous cycle and contributed toward fiscal action calculations.

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 submitted. 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. The Stepby-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 and/or termination of performance-based reimbursement (extra 8 cents).

Discussed how current system allowed Please provide a written description of the changes that have been made to ensure that grain quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be

3 Fluid milk was not available in at least two varieties at breakfast and lunch. Specifically, only unflavored 1% milk was available at breakfast and lunch. This was not a repeat finding from previous cycle and did not contributed toward fiscal action calculations.

Discussed variety requirement (even for Headstart) and feasible options for compliance (i.e., in juvenile corrections facility). Allowable milk varieties are fatfree unflavored, fat-free flavored and 1% unflavored. Please note that repeated violations involving milk requirements may result in fiscal action and/or termination of performancebased reimbursement (extra 8 cents).

Please provide one week of breakfast and lunch production records that demonstrate that fluid milk was available in at least two varieties. Additionally, please provide written assurance that fluid milk will always be available in at least two varieties at breakfast lunch.

#### Performance Standard 2: Dietary Specifications and Nutrient Analysis - Critical Area

No findings

## Meal Access & Reimbursement: Certification and Benefit Issuance

The Notification of Benefits does not include a current information on the hearing official.

Referred to Notification of Eligibility Determination 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. ADE Notification of Benefits Letter, School Meals template can be found on ADE's website at

https://www.azed.gov/hns/nslp/forms under the Eligibility Documents for School Meal Benefits accordion.

Please provide a copy of the written letter or documented procedure for verbal notification of households approved for free or reducedprice meal benefits with current hearing official information.

5 Direct certification matches were not conducted according 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).

Referred to Direct Certification for Assistance Programs section in USDA's Eligibility Manual for Scho Meals found on ADE's website at https://www.azed.gov/hns/nslp.und

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

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.

#### Meal Access & Reimbursement: Verification

under the Calendar and Checklists

accordion.

6 The person designated as the confirming official Discussed requirement for having a is the same person who makes eligibility determinations.

Discussed requirement for having a designated official for conducting confirmation reviews who is not the

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.

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 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.

7 Verification procedures were not followed correctly. Specifically, verification letter notifications were sent on January 16, 2024 and the Verification Summary Report was not done before November 15, 2023.

Discussed proper verification procedures and referred to Verification Tracking Form and 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 found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals 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.

8 Direct verification was not conducted as a part of the verification process.

Discussed/showed how to conduct direct verification in ADEConnect CNP Direct Certification/Direct Verification. Referred to Step-by-Step Instruction: How to Conduct Direct Verification in CNP Direct Certification/Direct Verification 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.

Please provide written procedures for conducting direct verification and written assurance that direct verification will be conducted according to requirements on all applications selected for verification. Additionally, the certificate of completion of Step-by-Step Instruction: How to Conduct Direct Verification in CNP Direct Certification/Direct Verification must be submitted.

9 Households selected for verification were not notified adequately. Specifically, the verification notice to households did not include hearing official information.

Discussed the LEA to determine a hearing official. This helps to ensure have the right to a fair hearing. 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

Please provide written assurance that households selected for verification will be parents and guardians are notified they notified according to requirements. Please also provide a copy of the notification letter that will be used for this purpose.

Meal Access & Reimbursement: Meal Counting and Claiming

the Guidance Manuals accordion.

No findings

Meal Pattern & Nutritional Quality: Offer Versus Serve

Not applicable

## Meal Pattern & Nutritional Quality: Meal Components and Quantities

10 Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast or lunch.

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.

Discussed feasible options for signage Signage was provided to sponsor and was corrected onsite. No further corrective action needed.

#### **Resource Management**

11 Supply Chain Assistance (SCA) funds were not used appropriately. Specifically, \$5,592.29 of SCA funds were provided as a lump sum to the caterer in addition to the per-meal price paid for meals containing unprocessed or minimally processed domestic food products.

Discussed that SFAs may use SCA funds toward the payment of invoices request and maintain documentation for minimally processed domestic foods used in the program meals purchased by the SFA or vendor. Contracts may contain language permitting the SFA and vendor to examine and renegotiate payment terms as long as scope and contract modification do not create a material change. Any methods, frequency and basis for fee adjustment upon renewal must be addressed in the original solicitation and contract. The basis must be specified on a standard index, such as the Consumer Price Index.

Please provide documentation demonstrating that the \$5,592.29 of SCA funds is returned to associated with their contract and must the nonprofit school food service account or provide a written description of the changes made to the procurement process that includes the review of invoices from the vendor to ensure payments do not exceed the agreed upon amounts set forth by the fixedprice contract, including the individual responsible.

12 A plan was not provided for the use of \$16,879.44 remaining in Supply Chain Assistance funds.

Discussed that the attestation statement signed by the SFA detailed that the SFA will use SCA funds only for purchasing unprocessed or minimally processed domestic food products and that SFAs are required to maintained. 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 a plan on how the remaining \$16,879.44 of Supply Chain Assistance funds will be spent. Additionally, provide a written description of how documentation of expenses will be

13 Supply chain assistance funds were not used appropriately. Specifically, \$8,905.41 of Supply Chain Assistance funds were used to purchase the following processed/non-domestic foods: disposable non-food items (containers, lids, cutlery), pizza and pasta sauce, processed meat products, baked products (bread, rolls, crackers), and non-domestic juice products.

Discussed that the attestation statement signed by the SFA detailed that the SFA will 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

Please provide a plan on how the \$16,879.44 of Supply Chain Assistance funds will be spent toward minimally processed domestic products.

#### **Procurement**

https://www.azed.gov/hns/memos.

14 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. Please provide a written description of how the remaining \$16,879.44 of Supply Chain Assistance funds will be spent toward minimally processed domestic products.

15 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. Showed where procurement procedure template can be located https://www.azed.gov/sites/default/files/ 2022/07/CNP%20Procurement%20Pro cedures.pdf

Please provide written procurement procedures that are consistent with 2 CFR 200.317 through 2 CFR 200.327.

#### **General Program Compliance: Civil Rights**

16 The public/media release was not provided to local media, the unemployment office and local employers considering large layoffs.

for public/media release, and best options locally for submitting the release to. Showed where template

https://www.azed.gov/hns/nslp/forms/. Discussed who would be responsible for doing this.

Discussed requirement and how to document that requirement has been met. An acceptable civil rights power point training material can be found on

https://www.azed.gov/hns/civilrights.

ADE's website at

Discussed requirements and timeframe 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, release can be found on ADE's website the unemployment office and local employers considering large layoffs prior to the start of each school year.

> Please provide written assurance that all food service staff will be trained at hire and as needed on Civil Rights Compliance in Child Nutrition Programs. Describe the process that will be implemented to ensure that this requirement is adhered to and properly documented.

17 Program staff have not been trained on civil rights topics.

18 The Civil Rights Compliance form is not being Discussed requirement for completing completed every year by December 15 and kept form and how to collect racial/ethnic on file.

Discussed requirement for completing data from program participants. The

Discussed requirement for completing form and how to collect racial/ethnic data from program participants. The form can be found on ADE's website at https://www.azed.gov/hns/civilrights.

The Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form can be found on ADE's website at https://www.azed.gov/hns/nslp/training

Please provide written assurance that the Civil Rights Compliance form will be completed by December 15 each year and kept on file for 5 years. Additionally, please indicate who will be responsible for completing this form. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form must be submitted.

19 The USDA nondiscrimination statement was not printed on appropriate program materials.

Specially on the Local Wellness Policy.

Discussed where to find nondiscrimination statem website at

Discussed where to find nondiscrimination statement on ADE's website at https://www.azed.gov/hns/civilrights and whether long or short statement

under the Online Training Library

accordion.

Please provide an updated program material with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.

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

would be most appropriate.

Not applicable

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

20 The required stakeholders are not being permitted to be involved in the development, review, and update of the Local Wellness Policy (LWP). Specifically, parents and students, were not permitted to participate in the development, review, and update of the LWP.

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/communityconnection/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.

Please provide a written description of how all stakeholders, including parents and students, will be permitted to be involved in the development, review, and update of the LWP. 21 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 Please provide a written plan for conducting assessment once every three years, at an assessment of the implementation of the 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, process, and the date by which the 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.

22 A plan is not in place to notify the public of the results of the most recent assessment of the implementation of the Local Wellness Policy (LWP), when assessment is conducted.

Discussed requirement to make the most recent assessment available to the public. Also discussed feasible means for notifying the public of the results of the most recent assessment on the implementation of the LWP. The **USDA's Local Wellness Policy** Outreach Toolkit can be found at https://www.fns.usda.gov/tn/localschool-wellness-policy-outreachtoolkit/.

Please provide a written plan for how the public will be notified of the results of the most recent assessment of the implementation of the LWP.

LWP. This plan must include who will be

designated as the oversight official, who will

be invited to participate in the assessment

assessment is expected to be completed.

## **General Program Compliance: Competitive Food Services**

No findings

#### **General Program Compliance: Professional Standards**

23 The School Nutrition Program Director hired after July 1, 2015 did not complete the required 8 hours of food safety training within 30 days of being hired or within 5 years prior to hire date.

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-az/food-safety/.

Please provide the expected date that food safety certification training will be completed by the School Nutrition Program Director.

24 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.

25 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

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.

Referred to USDA's Professional Please provide the tracker that will be used to Standards Training Tracker Tool and discussed requirements for tracking. - OR- Referred to ADE's Training Program staff. Additionally, please provide Tracking forms found on ADE's website written assurance that Professional Standards at https://www.azed.gov/hns/nslp/forms training hours will be tracked for all School Nutrition Program staff on an annual basis.

26 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

under the Online Training Library

accordion.

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 School Nutrition Program staff are registered for.

27 Professional Standards training hours are not being adequately tracked.

Referred to USDA's Professional Standards Training Tracker Tool and discussed requirements for tracking. -OR- Referred to ADE's Training 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.

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 Tracking forms found on ADE's website written assurance that Professional Standards at https://www.azed.gov/hns/nslp/forms training hours will be tracked for all School Nutrition Program staff on an annual basis.

## **General Program Compliance: Water**

No findings

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

28 Documentation was not maintained to support that the school received two food safety inspections from the local health department each school year, or that the school requested two food safety inspections each year from the local health department.

Discussed that each site operating must obtain two food safety inspections you will ensure that two food safety 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.

Please provide a written description of how inspections from the local health department will be obtained each school year. Additionally, please provide a photo demonstrating that the most recent food safety inspection report has been posted in a location where the program participants can

## General Program Compliance: Reporting and Recordkeeping

No findings

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

29 Outreach to families regarding the availability of the School Breakfast Program (SBP) was not conducted at the beginning of the school year.

of the school year. Additionally, serving times, locations where breakfast is available, and SBP costs.

Discussed methods of notifying families Please provide documentation that of the availability of the SBP at the start demonstrates how households are notified of the availability of the SBP at the beginning of discussed SBP outreach must include: 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.

30 Households were not notified of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year.

of the availability of the SFSP prior to the end of the school year and determined which was most feasible and where summer feeding locations can be found at https://www.azhealthzone.org/.

Discussed methods of notifying families 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.

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:
Congratulations! Santa Cruz Catholic School has completed the Administrative Review for the 2023-2024 school year.
Thank you for your hospitality during this review process. You are doing a wonderful job with breakfast in the classroom.
Encourage staff to complete professional standards training to ensure compliance is maintained.
Encourage can to complete protectional standards training to official compliance to maintained.
To atom on two k with NCLD requirements, shock out the NCLD at a Clause Calendar 9 Manthly Checklist on aux
To stay on track with NSLP requirements, check out the NSLP at a Glance Calendar & Monthly Checklist on our
website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> 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 \$112.80
$\square$ No- NSLP $\square$ Yes- NSLP \$449.95
Fiscal Action under \$600 will be disregarded.
Please submit corrective action response by June 14, 2024 to Destinee Williams at Destinee.Williams@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 <a href="School Food Authority Appeal Procedure for the Administrative Review">School Food Authority Appeal Procedure for the Administrative Review</a> 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.