



**ARIZONA DEPARTMENT OF
EDUCATION**

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Second Mesa Day School

CTD: 09-91-02

Site: Second Mesa Day

Contacts: Kim Thomas, Principle and Newman Albert, Food Service Director

Review Date: March 26, 2024

Review Period: February 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

Not applicable.

Performance Standard 1: Meal Counting and Claiming – Critical Area

No findings.

Performance Standard 2: Meal Components & Quantities – Critical Area

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| 1 Fluid milk was not available in at least two varieties at breakfast on the day of review. This was determined to not be a repeat finding from previous cycle and did not contribute toward fiscal action calculations. | Discussed variety requirement and feasible options for compliance. Allowable milk varieties are fat-free unflavored, fat-free flavored and 1% unflavored. Please note that repeated violations involving milk requirements may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents). | <i>Please provide one week of breakfast 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.</i> |
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| <p>2 Quantities observed on the day of review did not meet minimum amounts required by the meal pattern for breakfast. Specifically, only .25 oz eq grain was served instead of the required daily 1oz eq grain. This was determined to not be a repeat finding from the previous cycle and did not contribute 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 Breakfast 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 Breakfast Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).</p> | <p><i>Please provide a written description of the changes that have been 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 Breakfast Menu must be submitted.</i></p> |
| <p>3 Fluid milk was not available in at least two varieties at breakfast during the week of review. This was determined to not be a repeat finding from previous cycle and did not contribute toward fiscal action calculations.</p> | <p>Discussed variety requirement and feasible options for compliance. Allowable milk varieties are fat-free unflavored, fat-free flavored and 1% unflavored. Please note that repeated violations involving milk requirements may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).</p> | <p><i>Corrective action requirements for milk variety are detailed in Finding 1.</i></p> |
| <p>4 Quantities observed during the review period did not meet minimum amounts required by the meal pattern for breakfast. Specifically, only 2.25 oz eq grain was served instead of the required weekly 6.5 oz eq grain. This was determined to not be a repeat finding from the previous cycle and did not contribute 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 Breakfast 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 Breakfast Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that grain quantities at breakfast meet minimum amounts required by the meal pattern.</i></p> |

- 5 The following products could not be credited towards the meal pattern due to insufficient documentation for breakfast: WG Banana Muffin and WG Pancake. Without sufficient documentation, the reviewer was unable to determine if the grain quantity requirements were met. This was determined to not be a repeat finding from the previous cycle and did not contribute towards fiscal action calculations.
- Discussed requirements regarding 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 and/or termination of performance-based reimbursement (extra 8 cents).
- Please provide a Child Nutrition (CN) label and/or Product Formulation Statement (PFS) for WG Banana Muffin and WG Pancake. If unable to provide a CN label or PFS, please provide written assurance that the product will no longer be offered/served to students. Additionally, please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation. Additionally, the certificate of completion of CN Labels and Product Formulation Statements must be provided.*
- 6 Quantities observed during the review period did not meet minimum amounts required by the meal pattern for lunch. Specifically, red/orange subgroup did not meet the weekly requirement of 3/4 cups; only 5/8 cups were served. This was determined to not be a repeat finding from the previous cycle and did not contribute 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. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).
- Please provide a written description of the changes that have been made to ensure that weekly red/orange vegetable subgroup requirements meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu*

- 7 Quantities observed during the review period did not meet minimum amounts required by the meal pattern for lunch. Specifically, starchy subgroup did not meet the weekly requirement of 1/2 cups; only 1/4 cups were served. This was determined to not be a repeat finding from the previous cycle and did not contribute 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. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).
- Please provide a written description of the changes that have been made to ensure that weekly starchy vegetable subgroup requirements meet minimum amounts required by the meal pattern.*
- 8 The following products could not be credited towards the meal pattern due to insufficient documentation for lunch: Turkey Sliced Oven Roasted, Croissant Whole Grain. Without sufficient documentation, the reviewer was unable to determine if the quantity requirements were met. This was determined to not be a repeat finding from the previous cycle and did not contribute towards fiscal action calculations.
- Discussed requirements regarding 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 and/or termination of performance-based reimbursement (extra 8 cents).
- Please provide a Child Nutrition (CN) label and/or Product Formulation Statement (PFS) for Turkey Sliced Oven Roasted and Croissant Whole Grain. If unable to provide a CN label or PFS, please provide written assurance that the product will no longer be offered/served to students. Additionally, please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation.*
- 9 Quantities observed during the review period did not meet minimum amounts required by the meal pattern for lunch. Specifically, weekly m/ma requirements were not met, only 5.5oz eq meat/meat alternate was served instead of the required weekly 7oz eq meat/meat alternate. This was determined to not be a repeat finding from the previous cycle and did not contribute 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. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).
- 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.*

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| <p>10 Quantities observed during the review period did not meet minimum amounts required by the meal pattern for lunch. Specifically, only .75oz eq grain was served on 2/14/24 instead of the daily 1oz eq grain requirement. This was determined to not be a repeat finding from the previous cycle and did not contribute 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.). 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. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that daily grain quantities at lunch meet minimum amounts required by the meal pattern.</i></p> |
| <p>11 Quantities observed during the review period did not meet minimum amounts required by the meal pattern for lunch. Specifically, weekly grain requirements were not met, only 3oz eq grain was served instead of the required weekly 6.5oz eq grain. This was determined to not be a repeat finding from the previous cycle and did not contribute 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.). 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. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that weekly grain quantities at lunch meet minimum amounts required by the meal pattern.</i></p> |
| <p>12 During the week of review, at least 80% of grains served at lunch were not whole grain-rich.</p> | <p>Discussed whole grain-rich requirements. USDA's Whole Grain Resource for the National School Lunch and Breakfast Programs: A Guide to Meeting the Whole Grain-Rich Criteria can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion.</p> | <p><i>Please provide one week of lunch production records and supporting documentation (CN Label, PFS, ingredient lists, Nutrition Facts labels, etc.) that demonstrate at least 80% of grains served at lunch were whole grain-rich.</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

Not applicable

Meal Access & Reimbursement: Meal Counting and Claiming

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| 13 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 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

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| 14 Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast and lunch. | Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. | <i>Please provide the sign that will be displayed to students that demonstrates what constitutes a reimbursable meal at breakfast and lunch. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i> |
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Resource Management

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| 15 The Financial Management System utilized was insufficient to accurately identify and track all revenues and expenditures of the nonprofit school food service program. Specifically, an Annual Financial Report or documentation was not provided to support revenues and expenditures from the nonprofit school food service account. | Discussed feasibility for designating a separate financial account for the nonprofit school food service, as well as the requirement to differentiate revenues and expenditures of the nonprofit school food service program if a separate account cannot be designated. Discussed the importance of establishing a financial management system and internal controls needed to accurately track all revenues and expenditures of the nonprofit school food service program. | <i>Please provide a written description of steps that will be taken to ensure all revenues and expenditures of the nonprofit school food service account are easily identifiable as required in 7 CFR 210.14 were spent or a written plan on how the funds will be spent and tracked. Additionally, please provide a report showing all expenditures from the nonprofit school food service account from School Year 2022-2023</i> |
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| 16 | Documentation was not provided to support the usage of Supply Chain Assistance funds. | 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 https://www.azed.gov/hns/memos . | <i>Please provide documentation demonstrating how the \$8,890.28 of Supply Chain Assistance funds were spent.</i> |
| 17 | Documentation was not provided to support that food and labor costs from catering services provided by the SFA was paid in full to the nonprofit school food service account. | Discussed that if the SFA uses funds from the nonprofit school food service account to pay for food and labor for catering such as providing food and/or beverages for internal school departments, officials, events, meetings, school stores, external organizations, and/or other events, full payment must be invoiced and paid in full to the nonprofit school food service account. Additionally discussed that all documents pertaining to the school meal programs must be retained on file for at least 5 years, as is required by Arizona law. | <i>Please provide written steps that will be taken to ensure payment to the nonprofit school food service account is documented when providing catering services. Additionally, please provide written assurance that all documents pertaining to the school meal programs will be retained on file for at least 5 years, as is required by Arizona law.</i> |

Procurement

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| 18 | 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> |
| 19 | 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> |

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| 20 The SFA did not maintain records sufficient to detail the significant history of the procurement for formal purchases. Specifically, the request for proposals with required clauses, Buy American requirements, and written method for conducting evaluations of proposals was not provided for the following formal purchases: Sysco. | Discussed that non-Federal entities must maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to, the following: Rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price. | <i>Please provide a written description of procurement procedures that will be implemented to ensure that sufficient records for the request for proposals with required clauses, Buy American requirements, and written method for conducting evaluations of proposals will be maintained for all formal purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.</i> |
| 21 The SFA did not perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold. Specifically, a cost or price analysis was not conducted for the following goods/services: Sysco. | Discussed that a cost or price analysis must be performed for every procurement action in excess of the Simplified Acquisition Threshold, including contract modifications, before receiving bids or proposals. A price analysis will be used to determine the reasonableness of the proposed contract price. | <i>Please provide a written description of the procurement procedures that will be implemented for conducting the cost or price analysis prior to any formal procurement action. Additionally, please provide written assurance that all records will be maintained for 5 years.</i> |
| 22 The SFA did not maintain oversight to ensure that contractors performed in accordance with the terms, conditions, and specifications of their contracts or purchase orders for the following formal purchase: Sysco. | Discussed that non-Federal entities must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. | <i>Please provide a written description of the processes implemented to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.</i> |

General Program Compliance: Civil Rights

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| 23 Program staff have not been trained on civil rights topics. Specifically, documentation of completed or planned civil rights training for School Year 2023-2024 was not provided for the director. | Discussed requirement and how to document that requirement has been met. Acceptable civil rights training material can be found on ADE's website at https://www.azed.gov/hns/civilrights . | <i>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.</i> |
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General Program Compliance: SFA On-Site Monitoring

Not applicable

General Program Compliance: Local Wellness Policy

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| 24 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. | <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.</p> <p>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/nsfp/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/nsfp/training under the Online Training accordion.</p> | <i>Please provide a written plan for conducting an assessment of the implementation of the LWP. This plan must include who will be designated as the oversight official, who will be invited to participate in the assessment process, and the date by which the assessment is expected to be completed.</i> |
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General Program Compliance: Competitive Food Services

Not applicable

General Program Compliance: Professional Standards

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| 25 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. | <p>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/nsfp/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/nsfp/training under the Online Training Library accordion.</p> | <i>Please provide the expected date that the training requirement will be met as well as the name, date and content information of trainings that the School Nutrition Program Director is registered for.</i> |
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General Program Compliance: Water

No findings

General Program Compliance: Food Safety, Storage and Buy American

No findings

General Program Compliance: Reporting and Recordkeeping

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| <p>26 Production record crediting is inaccurate. Specifically, string cheese served at breakfast on 2/14/24 credited as 1oz eq m/ma; however, the production record indicated it contained 1oz eq grain.</p> | <p>Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Crediting resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion.</p> | <p><i>Please provide a production record that reflects the correct crediting information for string cheese. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i></p> |
| <p>27 The CNPWeb site application did not accurately reflect current practices in operation during the review period. Specifically, the CNPWeb site application reflected Monday-Friday for the Weekly Days of Operation when the site was only operating Monday-Thursday.</p> | <p>Advised SFA to update site application in CNPWeb and contact their assigned specialist to let them know of the changes.</p> | <p><i>Please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i></p> |

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

No findings

Other Federal Program Reviews: Afterschool Snack Program

Not applicable

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2024 if applicable.

Other Federal Program Reviews: Fresh Fruit and Vegetable Program

Not applicable

Other Federal Program Reviews: Special Milk Program

Not applicable

Other Federal Program Reviews: At-Risk Afterschool Meals

Not applicable

Comments/Recommendations:

Congratulations on completing the Administrative Review! Thank you for your hard work and cooperation during this 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

\$0.00

No- NSLP Yes- NSLP \$0.00

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by May 27, 2024 to Berenice Camacho Castaneda,
Berenice.Camachocastaneda@azed.gov.

Reviewer Signature Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the [School Food Authority Appeal Procedure for the Administrative Review](#) found under the Reviews Conducted by the State Agency accordion on ADE's National School Lunch and School Breakfast Program webpage.

Tom Horne, Superintendent of Public Instruction
1535 West Jefferson Street • Phoenix Arizona 85007 • www.azed.gov
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This institution is an equal opportunity provider.