



# ARIZONA DEPARTMENT OF EDUCATION

## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Wide Ruins Community School

CTD: 01-40-10

Site: Wide Ruins Community School

Contacts: Jeannie Lewis, Principal and Darryl Rockbridge, Food Service Lead

Review Date: March 27, 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

No findings

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

1	Meal count totals by category for the month of review were not correctly combined and recorded. Specifically, SFA is counting second meals at lunch and claiming them for reimbursement. This was deemed a systemic error 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.	<i>Please provide a written description of changes to the system that have been implemented to ensure that second meals are not included in the claim for reimbursement and written assurance that this will occur..</i>
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#### Performance Standard 2: Meal Components & Quantities – Critical Area

<p>2 Quantities observed on the day of review did not meet minimum amounts required by the meal pattern. Specifically, the fruit component at both breakfast and lunch did not meet minimum quantity requirements. 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 <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar &amp; Webinar Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> 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 fruit 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 AND Step-by-Step Instruction: How to Plan a Breakfast Menu must be submitted. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.</i></p>
<p>3 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the weekly grain component at lunch did not meet minimum quantity requirements. This was determined to be a repeat finding from the previous cycle and contributed toward fiscal action calculations.</p>	<p>The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar &amp; Webinar Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> 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 Lunch Menu. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.</i></p>

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

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<p>4 Salt packets were made available to students during lunch meal service. While this is not a violation of program requirements, it could cause the sodium range requirements to be exceeded.</p>	<p>Discussed low sodium requirements of the program and recommended that salt packets be removed from the service line.</p>	<p><i>None required at this time.</i></p>
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**Meal Access & Reimbursement: Certification and Benefit Issuance**

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5 Direct certification was not conducted according to the proper time frames, which is at least once at or around the beginning of April for CEP districts.	Referred to Direct Certification for Assistance Programs section in USDA's Eligibility Manual for School Meals found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Calendar and Checklists accordion.	<i>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.</i>
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**Meal Access & Reimbursement: Verification**

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No findings

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

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No findings

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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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Not applicable

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

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No findings

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**Resource Management**

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6 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 <a href="https://www.azed.gov/hns/memos">https://www.azed.gov/hns/memos</a> .	<i>Please provide documentation demonstrating how the \$13,947.08 of Supply Chain Assistance funds were spent.</i>
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7 A plan was not provided for the use of \$13,947.08 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 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 <a href="https://www.azed.gov/hns/memos">https://www.azed.gov/hns/memos</a> .	<i>Please provide a plan on how the \$13,947.08 of Supply Chain Assistance funds will be spent. Additionally, provide a written description of how documentation of expenses will be maintained.</i>
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**Procurement**

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8 The SFA did not take steps to assure that small, minority, and women's business enterprises and labor surplus firms are used when possible. Specifically, financial policy section 1.10 does not specify that the procurement process will offer preferences to women's businesses where procurements are possible.	Discussed that non-Federal entities must take all necessary affirmative steps to assure that minority businesses, women's businesses, and labor surplus area funds are used when possible. Affirmative steps must include: placing qualified small and minority businesses and women's business enterprises on solicitation list; assuring that small and minority businesses and women's business enterprises are solicited whenever they are potential sources; dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses and women's business enterprises; establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses and women's business enterprises; using services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and requiring the prime contractor, if subcontracts are to be let, to take these affirmative steps. Referred to 2 CFR 200.321.	<i>Please provide written procurement procedures that include the affirmative steps that will be taken to ensure that women's businesses are used when possible.</i>
9 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 Foods.	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>

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| 10 | 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 Foods.            | 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> |
| 11 | The SFA did not have procedures for providing sufficient oversight of the procurement to ensure contractors performed in accordance with the terms, conditions, and specifications of their contracts. Specifically, procedures for providing sufficient oversight of the procurement were not provided for the following formal purchases: Sysco Foods. | 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 procurement procedures that will be implemented to provide sufficient oversight of the terms, conditions, and specifications of awarded contracts. Additionally, please provide written assurance that all records will be maintained for 5 years.</i>  |

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**General Program Compliance: Civil Rights**

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| 12 | The USDA nondiscrimination statement was not printed on appropriate program materials. Specifically, the LWP. | Discussed where to find nondiscrimination statement on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> and whether long or short statement would be most appropriate. | <i>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.</i>          |
| 13 | Documentation to support that program staff have been trained on civil rights topics has not been maintained. | Discussed need for documentation of all food service staff training of civil rights topics.  | <i>Please provide a written description training on civil rights topics for all program staff will be documented. Provide a plan of when the training was completed or when the training is expected to be conducted next.</i> |

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

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Not applicable

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**General Program Compliance: Local Wellness Policy**

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| 14 | A recent assessment of the implementation of the Local Wellness Policy (LWP) has not been conducted nor have plans been developed to complete the assessment. | Discussed requirement to complete an assessment once every three years, at a minimum. The assessment must measure how the LEA is complying with their LWP, how the LEA's LWP compares to the model wellness policy, and progress made in attaining the goals of the wellness policy. Additionally, discussed feasible means for notifying the public of the results of the most recent assessment. Sample evaluation tools can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Local Wellness Policy accordion. Local Wellness Policy Assessment: Making it Meaningful Webinar can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training accordion. | <i>Please provide a written plan for conducting an assessment of the implementation of the LWP. This plan must include who will be designated as the oversight official, who will be invited to participate in the assessment process, and the date by which the assessment is expected to be completed.</i> |
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**General Program Compliance: Competitive Food Services**

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No findings

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**General Program Compliance: Professional Standards**

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| 15 | 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion.         | <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. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i>     |
| 16 | Full-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 6 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion. | <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 full-time School Nutrition Program staff 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.</i> |

17 Professional Standards training hours are not being tracked on an annual basis.	<p>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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion.</p>	<p><i>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 written assurance that Professional Standards training hours will be tracked for all School Nutrition Program staff on an annual basis. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i></p>
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**General Program Compliance: Food Safety, Storage and Buy American**

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18 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools storage facilities: Specifically, Cantaloupe product of Mexico, Honeydew Melon product of Mexico, Watermelon product of Mexico, Cantaloupe product of Guatemala. Additionally, documentation justifying a Buy American exception was not maintained/on file.	<p>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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational accordion. Buy American Recorded Webinar and FAQ can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion.</p>	<p><i>Please provide a written description of the changes that have been made to procurement and recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i></p>
19 The most recent food safety inspection report was not posted in a prominent location and was not visible to all program participants.	<p>Discussed making copies of most recent report and feasible places for posting.</p>	<p><i>Please provide a photo demonstrating that the most recent food safety inspection report has been posted in a location where the program participants can view it. Additionally, please specify where the report has been posted.</i></p>



<p>20 Temperature logs for food storage areas are not being maintained. Specifically, the reach in coolers behind meal service line were not current and 6 months of temperature logs were no available for walk in freezer.</p>	<p>Discussed requirements for maintaining food storage area temperature logs, sample templates, and who would be responsible. Temperature logs for food storage areas must be maintained for 6 months. Monitoring forms can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Food/Health Safety accordion. Additionally, discussed Food Safety Online Training Library can be found on ICN's website at <a href="https://theicn.org/icn-resources-a-z/food-safety/">https://theicn.org/icn-resources-a-z/food-safety/</a>.</p>	<p><i>Please provide written assurance that storage area temperature logs will be documented daily as well as written assurance that logs will be kept daily and maintained on-file for 6 months.</i></p>
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**General Program Compliance: Reporting and Recordkeeping**

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No findings

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

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No findings

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

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Not applicable

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**Other Federal Program Reviews: Seamless Summer Option**

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Will be reviewed in Summer 2024 if applicable.

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**Other Federal Program Reviews: Fresh Fruit and Vegetable Program**

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Not applicable

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**Other Federal Program Reviews: Special Milk Program**

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Not applicable

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**Other Federal Program Reviews: At-Risk Afterschool Meals**

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Not applicable

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**Comments/Recommendations:**

Congratulations! Wide Ruins Community School has completed the Administrative Review for the 2023-2024 program year. Thank you for your hospitality throughout the review process. It is recommended that the critical areas of the program are monitored internally to ensure ongoing compliance.

**To stay on track with NSLP requirements, check out the NSLP at a Glance Calendar & Monthly Checklist on our website at <https://www.azed.gov/hns/nslp/forms> under the Calendars and Checklists tab.**



**Training: In-person classes, web-based training, and how-to guides can be found on ADE's website at <https://www.azed.gov/hns/nslp/training>.**

Fiscal Action Assessed?

<input checked="" type="checkbox"/> No- SBP	<input type="checkbox"/> Yes- SBP	\$136.50
<input type="checkbox"/> No- NSLP	<input checked="" type="checkbox"/> Yes- NSLP	\$1,135.35

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by May 22, 2024 to Destinee Williams at [Destinee.Williams@azed.gov](mailto:Destinee.Williams@azed.gov).

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Reviewer Signature

Date

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Program Director 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](http://www.azed.gov)  
“We are a service organization committed to raising academic outcomes and empowering parents.”

This institution is an equal opportunity provider.