

Health and Nutrition Services Division

Administrative Review Summary Report

| Sch | hool Food Authority Name: Leupp Schools In | IC. | |
|------|--|--|--|
| СТ | D: 09-39-02 | | |
| Site | e: Leupp Schools | | |
| Coi | ntacts: Lolita Paddock, Phyllis Begay | | |
| 00. | Review Date: March 21, 2024 | | |
| | Review Period: February 5-8, 2024 | | |
| | | Cabaal Broakfast | Afternational Canada |
| | | | ☐ Afterschool Snack ☐ At-Risk Afterschool Meals |
| No. | Fresh Fruit & Ve Review Observations & Findings | Technical Assistance Provided | Required Corrective Action |
| INO. | | rd 1: Certification and Benefit Issuanc | |
| | No finding | The first continuous and bottom toodant | o ondour Arou |
| | | | |
| | Performance Stan | dard 1: Meal Counting and Claiming – | Critical Area |
| | No finding | | |
| | | | |
| | | ard 2: Meal Components & Quantities | |
| 1 | Quantities reported during the review period for SBP did not meet minimum amounts required by the meal pattern. Specifically, Daily grain served for breakfast on Monday 2/5/2024 credited at 0.25 oz eq, instead of the required 1 oz eq. | 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 School Breakfast Program can be found on ADE's website at http://www.azed.gov/hns/nslp under the Meal Pattern accordion. | 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 provide a recipe for the Blue Corn mush. |
| 2 | Quantities reported during the review period did not meet minimum amounts required by the NSLP meal pattern. Specifically, daily fruit requirement for K-8 Lunch on 2/5, 2/6, 2/8 And, 9-12 Lunch on 2/5, 2/6, 2/7,2/8, and 2/9. 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.). National School Lunch Program -can be found on ADE's website at http://www.azed.gov/hns/nslp under the Meal Pattern accordion. | Please provide a written description of the changes that have been made to ensure that daily fruit quantities meet minimum amounts required by the meal pattern. |
| 3 | Quantities reported during the review period did not meet minimum amounts required by the NSLP meal pattern. Specifically, weekly fruit requirement for K-8, and 9-12 Lunch. 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.). National School Lunch Program -can be found on ADE's website at http://www.azed.gov/hns/nslp under | Please provide a written description of the changes that have been made to ensure that weekly fruit quantities meet minimum amounts required by the meal pattern. |

the Meal Pattern accordion.

4 Quantities reported during the review period did Discussed how current system allowed Please provide a written description of the not meet minimum amounts required by the NSLP meal pattern. Specifically, daily vegetable changes that could be made to ensure requirement for K-8 Lunch on 2/5, 2/6, 2/8 And, 9-12 Lunch on 2/5, 2/6 and 2/9. This was determined to be a repeat finding from the previous cycle and contributed toward fiscal action calculations.

for this to happen and potential it doesn't continue (e.g., changes in serving utensils, recipes, etc.). National School Lunch Program -can be found on ADE's website at http://www.azed.gov/hns/nslp under the Meal Pattern accordion.

changes that have been made to ensure that daily vegetable quantities meet minimum amounts required by the meal pattern.

5 Quantities reported during the review period did Discussed how current system allowed Please provide a written description of the not meet minimum amounts required by the NSLP meal pattern. Specifically, weekly vegetable requirement for K-8 and 9-12 Lunch . it doesn't continue (e.g., changes in This was determined to be a repeat finding from serving utensils, recipes, etc.). the previous cycle and contributed toward fiscal National School Lunch Program -can action calculations.

for this to happen and potential changes that could be made to ensure be found on ADE's website at http://www.azed.gov/hns/nslp under the Meal Pattern accordion.

changes that have been made to ensure that weekly vegetable quantities meet minimum amounts required by the meal pattern.

6 Quantities reported during the review period did Discussed how current system allowed Please provide a written description of the not meet minimum amounts required by the NSLP meal pattern. Specifically, weekly vegetable subgroup requirement for K-8 and 9-12 Lunch. During the week of review the K-8 lunch records reported that 1/4 cup of dark vegetable subgroup was served instead of the required 1/2 cup. During the week of review the 9-12 lunch records reported 1/4 cup dark green vegetable subgroup was served instead of required 1/2 cup And 1 cup red/orange vegetable subgroup was served instead of the required 1 1/4 cup. . 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.). National School Lunch Program -can be found on ADE's website at http://www.azed.gov/hns/nslp under the Meal Pattern accordion.

changes that have been made to ensure that weekly vegetable subgroup quantities meet minimum amounts required by the meal pattern.

7 Quantities reported during the review period did Discussed how current system allowed Please provide a written description of the not meet minimum amounts required by the NSLP meal pattern. Specifically, daily Meat/Meat Alternate requirement for K-8 Lunch on 2/5, 2/6, 2/7, 2/8, 2/9 And 9-12 Lunch on 2/5, 2/6 and 2/9. This was determined to be a repeat finding from the previous cycle and contributed toward fiscal action calculations.

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changes that have been made to ensure that daily meat/meat alternate quantities meet minimum amounts required by the meal pattern.

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8 Quantities reported during the review period did Discussed how current system allowed Please provide a written description of the changes that have been made to ensure that weekly meat/meat alternate meet minimum amounts required by the meal pattern.

Performance Standard 2: Dietary Specifications and Nutrient Analysis - Critical Area No finding Meal Access & Reimbursement: Certification and Benefit Issuance No finding Meal Access & Reimbursement: Verification No finding

Meal Access & Reimbursement: Meal Counting and Claiming

9 Daily edit checks are not being conducted appropriately. Specifically, the attendance factor checks using ADE's Daily Edit Check on the daily edit check does not match the attendance factor on the monthly reimbursement claims.

Discussed how to complete daily edit worksheet. The Daily Edit Check Worksheet can be found on ADE's website

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.

Please provide a completed daily edit check worksheet for the most recently submitted claim month with updated attendance factor 90.24%

Meal Pattern & Nutritional Quality: Offer Versus Serve

10 Signage which explains what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable 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.

Please provide the sign that has been displayed explaining what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable. Additionally, please provide written assurance that this sign will be displayed for all students to see.

Meal Pattern & Nutritional Quality: Meal Components and Quantities

No Finding

Resource Management

11 Documentation to support the nonprofit school food service account's revenues and expenditures from July 1, 2021-June 30, 2022 was not provided.

Discussed the importance of establishing a financial management system and internal controls needed to ensure supporting documentation for accurately track and maintain all revenues and expenditures of the nonprofit school food service program. Discussed recordkeeping requirements and timeframe of 5 years.

Please provide a description of the systems or processes that will be implemented to revenues and expenditures is kept on file for a minimum of 5 years and will be made available to ADE upon request.

12 Documentation was not provided to determine if Discussed requirement that all equipment was purchased with an acquisition cost greater than \$5,000 received prior approval from the ADE.

equipment purchases with a per unit acquisition cost of \$5,000 or more must be pre-approved by ADE. Discussed that costs that would otherwise be allowable may be made unallowable by the action or inaction of the SFA. Additionally, the Capital **Expenditure Pre-Approval Request** Form can be found on the ADE's website at https://www.azed.gov/hns/nslp/forms

Please provide a written plan that outlines the steps which will be taken to ensure equipment with an acquisition cost of \$5,000 or more will not be purchased with the nonprofit school food service account without receiving prior approval from ADE.

13 Documentation supporting adult meal price was Discussed ways to determine adult not submitted. Therefore reviewer could not determine if meals served to teachers. administrators, custodians, and other adults were priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or payroll funds, or funding from voluntary agencies) was sufficient to cover the overall cost of the meal.

under the Financial accordion. meal prices which included a per meal cost analysis and pricing utilizing the Adult Meal Pricing Tool. Non-Pricing Sites: pricing adult meals to reflect the amount of reimbursement received for a free meal plus the per meal value of entitlement and bonus commodities for non-pricing programs. Pricing Site: the paid meal price plus the amount of reimbursement received for a paid meal plus the per meal value of entitlement and bonus commodities for pricing programs. Referred to Adult Meal Pricing Tool SY 22-23 on ADE's website at

Please provide the projected adult meal price for school year 2024-2025 and include the exact formula used to price adult meals.

14 A plan was not provided for the use of \$5,616.99 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 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.

https://www.azed.gov/hns/nslp/forms/ under the Financial accordion.

> Please provide a plan on how the \$5,616.99 of Supply Chain Assistance funds will be spent. Additionally, provide a written description of how documentation of expenses will be maintained.

Procurement

15 Small purchase procedures were not in compliance with procurement requirements. Specifically, insufficient documentation was provided to support that price or rate quotations were obtained from an adequate number of qualified sources.

price or rate quotations must be obtained from an adequate number of qualified sources as determined appropriate by the non-Federal entity.

If small purchase procedures are used, Please provide a written description of procurement procedures that will be followed prior to making a small purchase including the title of the individual within the SFA responsible for obtaining quotes for small purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.

16 The SFA did not maintain records sufficient to detail the significant history of the procurement for small purchases. Specifically, insufficient evaluation and award documentation was maintained.

Non-Federal entities must maintain records sufficient to detail the history of procurement procedures that will be 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.

Please provide a written description of implemented to ensure that sufficient records of the evaluation and award will be maintained for all small purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.

17 The SFA did not maintain oversight to ensure that contractors performed in accordance with the terms, conditions, and specifications of their perform in accordance with the terms, contracts or purchase orders.

Non-Federal entities must maintain oversight to ensure that contractors conditions, and specifications of their contracts or purchase orders.

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.

General Program Compliance: Civil Rights

18 The public/media release was not provided to local media, the unemployment office and local employers considering large layoffs for the SY 23-24.

Discussed requirements and timeframe for public/media release, and best options locally for submitting release can be found on ADE's website at https://www.azed.gov/hns/nslp/forms/. Discussed who would be responsible for doing this.

Please provide written procedures for distributing the public/media release and written assurance that the public/media the release to. Showed where template release will be submitted to the local media, the unemployment office and local employers considering large layoffs prior to the start of each school year.

19 Procedures for receiving and processing complaints alleging discrimination within the school meal programs are not in place.

Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., ADE, Food & Nutrition Services Southwest Regional Office, FNS Office of Civil Rights, or USDA Office of Civil Rights). The SFA's procedures must note whether an allegation is made verbally or in person. The SFA staff member receiving the allegation must transcribe the complaint. The SFA's procedures for receiving a complaint cannot prevent a complaint from being accepted. Additionally, the SFA's procedures must not indicate that they attempt to resolve the complaint themselves nor can the SFA's complaint process be a prerequisite for accepting a complaint. Additional guidance can be found on ADE's website at https://www.azed.gov/hns/civilrights.

The Step-by-Step Instruction: How to File a Civil Rights Complaint can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.

Please provide a written description of the process and procedures for processing complaints alleging discrimination within FNS School Meal Programs. Additionally, the certificate of completion of Step-by-Step Instruction: How to File a Civil Rights Complaint must be submitted.

20 Medical statement for students with special dietary accommodations does not contain required sections: Specifically, the form reviewed are missing a signature from a licensed professional; the form doesn't include the food item to avoid or omitted or list of substitutions; and the form does not indicate if modification is temporary or permanent. Discussed required sections of the medical statement for students with special dietary accommodations. Referred to Medical Statement for Students with Special Dietary Accommodations found on ADE's website at

https://www.azed.gov/hns/nslp/forms under the Operational accordion. Step-by-Step Instruction: How to Complete the Medical Statement for Students with Special Dietary Accommodations can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.

Please provide a copy of the updated Special Dietary Needs Form that will be used for this purpose. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete the Medical Statement for Students with Special Dietary Accommodations must be submitted.

21 Program staff have not been trained on civil rights topics. Discussed requirement and how to document that requirement has been met. An acceptable civil rights power point training material can be found on ADE's website at

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

22 SFA did not demonstrate adequate services are provided to Limited English Proficient (LEP) aware of an LEP individual's need to households. Specifically, households are not aware of services provided by SFA. that their application and other

Discussed requirement that once aware of an LEP individual's needs, the LEA is responsible for ensuring that their application and other household materials are available in the language the LEP individual can understand. Referred to SP 37-2016 which can be found on ADE's Memos webpage at

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.

Please describe the services that will be available to LEP households henceforth and how information will be shared with households.

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

General Program Compliance: SFA On-Site Monitoring

No finding

General Program Compliance: Local Wellness Policy

23 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.

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.

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 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 finding

General Program Compliance: Professional Standards

- 24 Sufficient documentation was not provided to evaluate professional standards for a School Nutrition Program Director. Specifically, the reviewer was unable to determine if the School Nutrition Program Director hired after July 1, 2015 met the hiring standards.
- 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.

Referred to hiring standard requirements and discussed with appropriate district HR/school staff. The Online Course: Designing Your Employee Training Plan: A Course for on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.

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.

Please provide written assurance of who the designated School Food Authority (SFA) is at the district level. Provide a completed New Director Hiring Form provided by ADE to determine hiring standards are met for the School Nutrition Directors can be found SFA. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.

> 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.

26 Employees outside of the School Nutrition Program whose responsibilities assist in the operation of the NSLP/SBP have not received applicable training. Specifically, training records for support staff and student helpers.

Discussed 4 hour training requirement, Please provide the expected date that the employees' job duties and applicable trainings that could be provided and feasible timeline. 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.

27 Professional Standards training hours are not being tracked.

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.

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.

training requirement for support staff and

student helpers will be met as well as the

trainings that these employees will receive.

name, date and content information of

General Program Compliance: Water

No finding

General Program Compliance: Food Safety, Storage and Buy American

28 Temperature logs for food storage areas are maintained, however the SFA did not have records available for review during on-site observations.

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 https://www.azed.gov/hns/nslp/forms under the Food/Health Safety accordion. Additionally, discussed Food Safety Online Training Library can be found on ICN's website at https://theicn.org/icn-resources-az/food-safety/.

Please written assurance that logs will be kept daily and maintained on-file for 6 months on campus at Leupp Schools.

29 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed Leupp Schools: Bountiful Harvest Pineapple Tidbits-product of Indonesia, Bountiful Harvest Fruit Cocktail- product of Indonesia, Thailand, Malaysia and Philippines, Banana- Product of Ecuador, Grapes product of Chile, Cucumber-product of Mexico and Mandarin oranges-product of China. Additionally, documentation justifying a Buy American exception was not maintained/on file.

requirements and procedures to ensure compliance. Referred to SP38-2017, Buy American Webinar and FAQ. Funds used from the non-profit food service account must be used to procure food products that comply with the Buy American Provision. Additional information on the requirements of this provision, including ADE's prototype Buy American exception document, can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational accordion. Buy American Recorded Webinar and FAQ can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.

Discussed the Buy American provision Please provide a written description of the requirements and procedures to ensure compliance. Referred to SP38-2017, Buy American Webinar and FAQ. Funds used from the non-profit are met.

General Program Compliance: Reporting and Recordkeeping

30 Production records for breakfast and lunch provided did not contain all required sections: Specifically, production records used/left over section is not completed adequately. Discussed required sections of production records. Production Record Templates can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. The Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at https://www.azed.gov/hns/nslp/training

Please provide copies of completed breakfast and lunch production records for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years. Additionally, the certificate of completion of Production Record Overview must be provided.

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

under the Online Training Library

accordion.

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

Discussed methods of notifying families of the availability of the SFSP prior to the end of the school year and determined which was most feasible and Discussed other resources within the local area to provide families regarding meals during the summer months when school is not in session. Summer feeding locations can be found at

https://www.azhealthzone.org/.

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 | |
| Not 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 | | |

| Commente | Recommend | latione: |
|----------|-----------|----------|
| | | |

Thank you for your cooperation in the administrative review of Leupp Schools Inc. School Breakfast Program and National School Lunch Program. During the on-site portion of the review, reviewers were impressed by the menu, the incorporation of fresh fruits and vegetables and the high level of student participation. However, several administrative insufficiencies were identified, specifically in training, record keeping, and the availability of recipes and nutrition labels which resulted in fiscal action. It is recommended to Leupp Schools Inc. to provide additional staff support (administrative and operational) to the SBP and NSLP to provide program oversight and enhance program 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 A | ssessed? | | | | | |
|-----------------|----------------|-----------------|------------------|---------------------|----------------------------------|------|
| ✓ | No- SBP | Yes- SBP | \$ | 193.83 | | |
| | No- NSLP | ✓ Yes- NSLP | \$ | 6,973.05 | | |
| Fiscal Action u | nder \$600 wil | l be disregarde | ed. | | | |
| Please submit | corrective act | ion response t | oy June 27, 2024 | to Ana Gandarilla a | t Ana.gandarilla@azed.gov. | |
| Davieway Ciere | | Dete | _ | | Due was as Dive story Cierroture | Data |
| Reviewer Signa | ature | 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 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
"We are a service organization committed to raising academic outcomes and empowering parents."

This institution is an equal opportunity provider.