



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: St. Thomas the Apostle
CTD: 07-20-17
Site: St. Thomas the Apostle

Contacts: Mary Coffman, School Principal; Lori Kroener, Food Service Manager

Review Date: April 23, 2024

Review Period: March 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

1	Multiple applications were certified incorrectly or utilized incomplete information. Specifically 3 students should have been certified reduced instead of free based on income. 2 students had applications with incomplete information. This contributed toward fiscal action calculations.	Discussed errors found and required corrective action. Referred to Processing Applications, Reviewing Applications Based on Income, Assessing Completeness of Categorically Eligible Applications, Determining Eligibility for Categorically Eligible Applications section(s) 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.	<i>Corrections have been made to certification errors. Please describe the process that will be implemented to reduce the amount of errors that occur while determining the eligibility status for each student. Additionally, the certificate of completion of Step-by-Step Instruction: How to Process Household Applications must be submitted.</i>
2	In multiple instances, the eligibility determined was not transferred correctly to the benefit issuance document. Specifically 2 students were certified as reduced, but listed as free on the BID. This contributed toward fiscal action calculations.	Discussed requirement that eligibility status must be implemented within 10 operating days of receipt of an application. And Discussed best practices (like having someone double check) for ensuring eligibility status is transferred to the benefit issuance document on a regular basis. The Step-by-Step Instruction: How to Create a Benefit Issuance Document (BID) can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Corrections have been made to the benefit issuance document. Please provide a written description of the process that will be implemented to ensure that the benefit issuance document matches all current students and their eligibility status.</i>

Performance Standard 1: Meal Counting and Claiming – Critical Area

No findings

Performance Standard 2: Meal Components & Quantities – Critical Area

No findings

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

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| 3 Error-prone applications were not selected for verification. Additional applications were determined to be error-prone during review and should have been subjected to Verification. | Discussed requirement of selecting from error-prone applications and potential methods of identifying them. Referred to Error-Prone Worksheet found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Eligibility Documents for School Meal Benefits accordion. The Step-by-Step Instruction: How to Identify Household Applications That Are Error-Prone 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 written description of how error-prone applications will be identified and written assurance that applications to be verified will be selected from error-prone applications. Additionally, the certificate of completion of Step-by-Step Instruction: How to Identify Household Applications That Are Error-Prone must be submitted.</i> |
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Meal Access & Reimbursement: Meal Counting and Claiming

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| 4 A local meal charge policy has not been developed. | Discussed the Unpaid Meal Charge Policy and referred to memos SP 29-2017, SP 29-2017a, SP 23-2017 and HNS 14-2017, which can be found on ADE's website at https://www.azed.gov/hns/memos . | <i>Please provide a copy of the local meal charge policy that will be created.</i> |
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Meal Pattern & Nutritional Quality: Offer Versus Serve

No findings

Meal Pattern & Nutritional Quality: Meal Components and Quantities

No findings

Resource Management

No findings

Procurement

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| 5 Procurement procedures did not take steps to prohibit the acquisition of unnecessary or duplicative items. | Discussed that non-Federal entities must take all necessary affirmative steps to assure that Procurement Procedures prohibit of acquisition of unnecessary/duplicative items and/or reference to complying with 7 CFR 200.318. When using Federal money, it is important that SFAs thoroughly evaluate their needs to ensure that any purchases are necessary, reasonable, and allocable to the program. | <i>Please provide updated written codes of conduct that are consistent with 2 CFR 200.318.</i> |
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| 6 | Small purchase procedures were not in compliance with procurement requirements. Specifically, no solicitation, evaluation, or award documentation was provided for the following small purchases: Smart and Final & Shamrock Foods. | Discussed that all procurement transactions for the acquisition of property or services required under a Federal award must be conducted in a manner providing full and open competition consistent with the standards of this 2 CFR 200.319 and 2 CFR 200.320. Additionally discussed that non-Federal entities must have written procedures for procurement transactions. These procedures must ensure that all solicitations incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. | <i>Please provide a written description of solicitation procedures that will be followed prior to making a small purchase including the title of the individual within the SFA responsible for conducting the solicitation for all small purchases. 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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| 7 | The public/media release was not provided to local media, the unemployment office and local employers considering large layoffs. | Discussed requirements and timeframe for public/media release, and best options locally for submitting the release to. Showed where template release can be found on ADE's website at https://www.azed.gov/hns/nslp/forms/ . Discussed who would be responsible for doing this. | <i>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, the unemployment office and local employers considering large layoffs prior to the start of each school year.</i> |
| 8 | Program staff have not been trained on civil rights topics. Specifically Food Service Director. | 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/ . | <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> |
| 9 | Sufficient documentation to support accommodations for special diets has not been maintained. Specifically, there is no form made available to accommodate students with dietary needs that diverge from meal pattern requirements. | Discussed requirements for accommodating special diets and the need for sufficient documentation. 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. Additionally, referred to Accommodating Children with Disabilities in the School Meal Program found on ADE's website at https://www.azed.gov/hns/nslp/ under the Guidance Manuals 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. | <i>Please provide written procedures for maintaining documentation supporting accommodations for special diets and written assurance that sufficient documentation to support accommodations for special diets will be maintained. 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.</i> |

General Program Compliance: SFA On-Site Monitoring

No findings

General Program Compliance: Local Wellness Policy

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| 10 | The Local Wellness Policy (LWP) did not contain all required elements. Specifically, the LWP did not contain policies for food and beverage marketing. | Discussed updating the LWP to include policies that allow marketing and advertising of only those foods and beverages that meet Smart Snacks Standards during the school day. Explained that this requirement applies to exterior vending machines, posters, menu boards, coolers, trash cans and cups used for beverage dispensing. 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. | <i>Please provide a written plan for how policies for food and beverage marketing will be added to the LWP. The plan should include draft language of the element to be added, who will be involved in updating the LWP and the date the update is expected to be completed. Additionally, provide written assurance that the LWP will be specific to your institution.</i> |
| 11 | Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the Local Wellness Policy (LWP). Specifically, parents, students, and general public were not made aware of their ability to participate in the development, review, and update of the LWP. | Discussed feasible means of notifying potential stakeholders of their ability to participate. 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. | <i>Please provide a written description of how all potential stakeholders, including parents, students, and general public, will be made aware of their ability to participate in the development, review, update, and implementation of the LWP.</i> |
| 12 | 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 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. | <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> |

General Program Compliance: Competitive Food Services

No findings

General Program Compliance: Professional Standards

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| 13 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. | <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> |
| 14 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 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. | <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 Part-time School Nutrition Program staff are registered for.</i> |

General Program Compliance: Water

No findings

General Program Compliance: Food Safety, Storage and Buy American

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| 15 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) Specifically, Broccoli from Mexico, grape tomatoes from Mexico, Blueberries from Mexico, Canned mandarins from China, Cantaloupe from Guatemala, Honeydew from Mexico, and Olives from Morocco. | 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 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. | <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> |
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General Program Compliance: Reporting and Recordkeeping

No findings

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

16	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. Summer feeding locations can be found at https://www.azhealthzone.org/ .	<i>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.</i>
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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

Comments/Recommendations:

Thank you for your participation in the administrative review of your NSLP program. It was insightful to witness the operations firsthand, especially the effective utilization of the fruit and salad bar. I'm pleased to note the significant improvements made to ensure compliance with meal patterns since the last administrative review. I recommend planning out annual staff training sessions to further support ongoing 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 Assessed?

No- SBP Yes- SBP
 No- NSLP Yes- NSLP \$0.00

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by June 28, 2024 to Ana Gandarilla Ana.gandarilla@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
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This institution is an equal opportunity provider.

