



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Adobe Mountain School

CTD: 21-91-01

Site(s): Adobe Mountain School

Contacts: Jeff Turney, Support Services Chief Administrator ; Leon Anderson, Food Service Manager

Review Date: February 15, 2024

Review Period: January 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 review period were not correctly combined and recorded. This contributed toward fiscal action calculations.	Discussed how current system allowed for this to happen and the changes that must be made to ensure it doesn't continue. Specifically, the meal counts will be reflective of the electronic point of sale and not reflective of total meals prepared.	<i>Please provide a written description of changes to the counting and claiming system that have been implemented to ensure that meal service lines provide an accurate meal count.</i>
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Performance Standard 2: Meal Components & Quantities – Critical Area

2	During the week of review, at least 80% of grains served at breakfast and lunch were not whole grain-rich. Specifically 60.61% of the grains offered during breakfast and 59.77% of the grains offered during lunch were Whole Grain-Rich.	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.	<i>Please provide one week of breakfast production records and supporting documentation (CN Label, PFS, ingredient lists, Nutrition Facts labels, etc.) that demonstrate at least 80% of grains served at breakfast were whole grain-rich.</i>
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- 3 Quantities observed during the review period and the day of review did not meet minimum amounts required by the meal pattern. Specifically, fruit quantities did not meet minimum daily and weekly requirements for breakfast. This is not a repeat finding from the previous review 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.). 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 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).
- Please provide a written description of the changes that have been made to ensure that Daily & Weekly Fruit quantities meet minimum amounts required by the meal pattern at breakfast. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Breakfast Menu must be submitted.*
- 4 Quantities observed during the review period and the day of review did not meet minimum amounts required by the meal pattern. Specifically, fruit quantities did not meet minimum daily and weekly requirements for Lunch. This is a repeat finding from the previous review cycle and did 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 provide a written description of the changes that have been made to ensure that Daily & Weekly Fruit quantities meet minimum amounts required by the meal pattern at lunch.. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.*

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| 5 | Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, grain quantities did not meet minimum daily requirements for Lunch. This is a repeat finding from the previous review cycle and did 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. | <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 at lunch.</i> |
| 6 | The following products could not be credited towards the meal pattern due to insufficient documentation: Chicken Fajita, Hamburger Patty and Pizza offered during the review period and the day of review. Without sufficient documentation, the reviewer was unable to determine if the minimum quantity requirements were met for M/MA. This was determined to be a repeat finding from the previous cycle and contributed 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). | <i>Please provide a Child Nutrition (CN) label and/or Product Formulation Statement (PFS) for Chicken Fajita, Hamburger Patty and Pizza. 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.</i> |

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

No Findings

Meal Access & Reimbursement: Certification and Benefit Issuance

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| 7 | 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 Access & Reimbursement: Verification

No Findings

Meal Access & Reimbursement: Meal Counting and Claiming

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| 8 | The Free and Reduced-Price Policy Statement provided by the SFA does not reflect current practices and procedures observed on-site. Specifically, the current agreement is not signed by an authorized official. | Referred them to FRPPS template on ADE's website at website at https://www.azed.gov/hns/nslp/forms under the Organizational accordion. | <i>Please provide an updated and signed Free and Reduced-Price Policy Statement. Additionally, please provide written assurance that moving forward, the Free and Reduced Price-Policy Statement will reflect current practices.</i> |
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Meal Pattern & Nutritional Quality: Offer Versus Serve

No Applicable

Meal Pattern & Nutritional Quality: Meal Components and Quantities

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| 9 | 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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| 10 | Lunch meals served to teachers, administrators, custodians, and other non-program adults were not priced so that the adult payment was sufficient to cover the overall cost of the meal. | Discussed ways to determine adult 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 https://www.azed.gov/hns/nslp/forms/ under the Financial accordion. | <i>Please provide a written description of the steps which have been taken to increase adult meal prices and resolve the discrepancy, including the exact formula used to price adult meals. Additionally, please submit supporting documentation which reflects that prices have been increased to the appropriate level.</i> |
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Procurement

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| 11 | The SFA's written codes of conduct for procurement within the program did not include disciplinary actions for violations by officers, employees, or agents. | 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. The policy does not have to list out specific disciplinary actions, but should at least refer to existing policies for disciplinary action when the code of conduct policy is violated. | <i>Please provide updated written codes of conduct that are consistent with 2 CFR 200.318. or provide an addendum to the current code of conduct that contains a description of disciplinary actions for violations of the code of conduct by officers, employees, or agents.</i> |
| 12 | The SFA did not maintain records sufficient to support the use of the emergency noncompetitive procurement method. Specifically, records detailing the rationale for the method of procurement was not maintained for the following noncompetitive purchases: Shamrock Foods | Discussed that, consistent with procurement regulations at 2 CFR 200.318(i), SFAs should retain information, data, and documents which qualify specific conditions and emergency circumstances which resulted in the decision to use the emergency noncompetitive procurement method and the procurement process, itself. Failure to plan for transition to competitive procurement cannot be the basis for continued use of noncompetitive procurement based on exigency or emergency circumstances. Documentation must include an explanation of the rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price. In addition, SFAs should retain documentation providing information on the food and supplies (e.g., delivery, processing, other) being procured, including the estimated quantity and dollar value of the emergency procurement; and how the emergency procurement was handled (i.e., obtained through negotiation, phone, email, etc.). | <i>Please provide a written description of procurement procedures that will be implemented to ensure that sufficient records detailing the rationale for the method of procurement will be maintained for all noncompetitive purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.</i> |
| 13 | 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: Shamrock 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> |

General Program Compliance: Civil Rights

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| 14 | The USDA nondiscrimination statement used on program materials is not the most current USDA statement. Specifically, the incorrect short statement is in use on the published monthly menus. | Discussed where to find nondiscrimination statement on ADE's website at https://www.azed.gov/hns/civilrights and whether long or short statement would be most appropriate. | <i>Please provide an updated published monthly menu with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i> |
| 15 | The USDA nondiscrimination statement was not printed on appropriate program materials. Specifically; the documentation supporting meal modifications/accomodations. | Discussed where to find nondiscrimination statement on ADE's website at https://www.azed.gov/hns/civilrights and whether long or short statement would be most appropriate. | <i>Please provide documentation supporting meal modifications/accomodations with the correct nondiscrimination statement.</i> |
| 16 | The Civil Rights Compliance form is not being completed every year by December 15 and kept on file. | Discussed requirement for completing form and how to collect racial/ethnic data from program participants. The form can be found on ADE's website at https://www.azed.gov/hns/civilrights . The Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion. | <i>Please provide written assurance that the Civil Rights Compliance form will be completed by December 15 each year and kept on file for 5 years. Additionally, please indicate who will be responsible for completing this form. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form must be submitted.</i> |

General Program Compliance: SFA On-Site Monitoring

Not Applicable.

General Program Compliance: Local Wellness Policy

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| 17 | 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. Specifically, the assessment did not measure how the LEA is complying with their LWP, how the LEA's LWP compares to a model wellness policy, and/or progress made in attaining the goals of the LWP. | 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> |
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General Program Compliance: Competitive Food Services

No Findings

General Program Compliance: Professional Standards

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| 18 The School Nutrition Program Director hired after July 1, 2015 did not complete the required 8 hours of food safety training within 30 days of being hired or within 5 years prior to hire date. | Discussed requirement and feasibility for attending an available certification training within current school year. Food Safety Online Training Library can be found on ICN's website at https://theicn.org/icn-resources-a-z/food-safety/ . | <i>The Food safety certification training was completed by the School Nutrition Program Director in July of 2023. No Further Corrective Action is Required.</i> |
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General Program Compliance: Water

No Findings

General Program Compliance: Food Safety, Storage and Buy American

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| 19 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d): Makron First Crop - Cucumber (MEX) observed during the day of the review. Additionally, documentation justifying a Buy American exception was not maintained/on file. | 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

20 Production records for breakfast and lunch did not contain all required sections: Specifically, recipe numbers.	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 under the Online Training Library accordion.	<i>Please provide copies of completed Breakfast and lunch production records for 5 consecutive days to ensure that recipe numbers are included where appropriate.</i>
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General Program Compliance: School Breakfast Program and Summer Food Service Program Outreach

21 Outreach to families regarding the availability of the School Breakfast Program (SBP) was not conducted at the beginning of the school year.	Discussed methods of notifying families of the availability of the SBP at the start of the school year. Additionally, discussed SBP outreach must include: serving times, locations where breakfast is available, and SBP costs.	<i>Please provide documentation that demonstrates how households are notified of the availability of the SBP at the beginning of the school year. Additionally, please provide a written description of how households will be notified of the availability of the SBP at the beginning of the school year and written assurance that this will occur.</i>
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22 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. Discussed other resources within the local area to provide families regarding meals during the summer months when school is not in session and 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

Comments/Recommendations:

Thank you for your hospitality and organization during the review process. It is evident that you are working hard to ensure your students are fed healthy meals in a welcoming environment.

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 type="checkbox"/> No- SBP	<input checked="" type="checkbox"/> Yes- SBP	\$4,949.49
<input type="checkbox"/> No- NSLP	<input checked="" type="checkbox"/> Yes- NSLP	\$8,856.60

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by May 31, 2024 to Tania.Felix@azed.gov.

5/17/2024

Reviewer Signature

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
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This institution is an equal opportunity provider.