



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Mary C O'Brien Accommodation District
CTD: 11-01-00
Site: Villa Oasis Interscholastic Center For Education (voice)

Contacts: Marty Bassett, District Superintendent and Jose Calderon, Food Service Director

Review Date: October 29, 2024

Exit Conference Date: October 29, 2024

Review Period: September 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

No findings.

Performance Standard 2: Meal Components & Quantities – Critical Area

1 Insufficient weekly grain quantities required by the meal pattern served at breakfast during the review period. Specifically, 8.75 oz eq grain was served on September 9-13, 2024 when 9.0 oz eq grain is required weekly at breakfast for grades 9-12. This was deemed a systemic error and also occurred during the week of September 23-27, 2024. This was not a repeat finding from the previous cycle and did not contribute toward fiscal action calculations.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School 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.	<i>Please provide a written description of the changes that have been made to ensure that weekly grain quantities at breakfast meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Breakfast Menu must be submitted.</i>
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Performance Standard 2: Dietary Specifications and Nutrient Analysis – Critical Area

No findings.

Meal Access & Reimbursement: Certification and Benefit Issuance

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| 2 | Daily edit checks are not being conducted appropriately. Specifically, the attendance factor on the daily edit check does not match the attendance factor on the monthly reimbursement claims. | 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 the attendance factor reflected on the daily edit check worksheet will be updated annually.</i> |
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Meal Access & Reimbursement: Verification

No findings.

Meal Access & Reimbursement: Meal Counting and Claiming

No findings.

Meal Pattern & Nutritional Quality: Offer Versus Serve

No findings.

Meal Pattern & Nutritional Quality: Meal Components and Quantities

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| 3 | Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast. | Discussed feasible options for signage and potential content as well as the plan for creating and posting near the point of service. Printable reimbursable meal 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. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i> |
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Resource Management

No findings.

General Program Compliance: Civil Rights

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| 4 | The USDA nondiscrimination statement used on program materials is not the most current USDA statement. Specifically, the parent letter and public media release did not contain the most current USDA nondiscrimination statement. | 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 parent letter and public media release with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i> |
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| 5 | 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. | <i>Please provide a written description of the process and procedures for processing complaints alleging discrimination within Federal School Meal Programs. Additionally, the certificate of completion of Step-by-Step Instruction: How to File a Civil Rights Complaint must be submitted.</i> |
| 6 | The Civil Rights Compliance Form is not being completed appropriately. Specifically, all enrolled students were not included in the Race data chart. | 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 a written description of changes that have been made to ensure all enrolled students are included in both the Ethnicity and Race data charts on the Civil Rights Compliance 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

No findings.

General Program Compliance: Local Wellness Policy

No findings.

General Program Compliance: Competitive Food Services

<p>7 Foods and beverages sold to students in grades 9-12 during the school day do not meet Smart Snacks Standards. Specifically, Gatorade, Capri Sun, and Brisk Iced Tea exceeded 60 calories per 12 fluid ounces. Additionally, Goldfish Cheddar Crackers and Dill Pickle exceeded 200mg sodium and Italian Ice did not meet any of the general nutrition standards for Smart Snacks."</p>	<p>Discussed Smart Snacks requirements for grades K-8 including that all foods and beverages sold or served to students during the school day (defined as the midnight before to 30 minutes after the end of the school day) must meet Smart Snack requirements. The Alliance for a Healthier Generation Smart Snacks Product Calculator can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational accordion. Smart Snacks Summary Chart and additional resources can be found on USDA's website at https://www.fns.usda.gov/school-meals/tools-schools-focusing-smart-snacks. The Online Course: Smart Snacks and Competitive Foods Standards in Arizona can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.</p>	<p><i>Please provide written procedures for assessing whether a product meets Smart Snacks Standards and written assurance that Gatorade, Capri Sun, Brisk Iced Tea, Goldfish Cheddar crackers, Dill Pickle and Italian Ice will no longer be served or sold during the school day. Additionally, the certificate of completion of Online Course: Smart Snacks and Competitive Foods Standards in Arizona must be submitted.</i></p>
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General Program Compliance: Professional Standards

No findings.

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

No findings.

General Program Compliance: Reporting and Recordkeeping

<p>8 Production record crediting is inaccurate. Specifically, bagels served at breakfast from September 9-13, 2024 credited as 1.75 oz eq grain; however, the production record indicated it contained 2.0 oz eq grain. Additionally, the bagel served on the day of review credited as 3.0 oz eq grain; however, the production record indicated it contained 2.0 oz eq grain.</p>	<p>Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Additionally discussed that crediting information is not a required element of a production record and therefore is not required to be included on the production record. Crediting resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion.</p>	<p><i>Please provide a production record that reflects the correct crediting information for Bagels. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i></p>
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General Program Compliance: School Breakfast Program and Summer Food Service Program Outreach

No findings.

Other Federal Program Reviews: Afterschool Snack Program

Not applicable.

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2025 if applicable.

Other Federal Program Reviews: Fresh Fruit and Vegetable Program

Not applicable.

Other Federal Program Reviews: Special Milk Program

Not applicable.

Other Federal Program Reviews: At-Risk Afterschool Meals

Not applicable.

Comments/Recommendations:

Congratulations! Mary C O'Brien Accommodation District has completed the administrative review for the 2024-2025 school year. Thank you for your hospitality, organization, and sense of urgency during the review process. Your team works marvelously together in order to do an outstanding job implementing the Child Nutrition Programs. It is evident that you are working hard to ensure your students are fed healthy, delicious meals in a supportive 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?

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| <input checked="" type="checkbox"/> No- SBP | <input type="checkbox"/> Yes- SBP | \$0 |
| <input checked="" type="checkbox"/> No- NSLP | <input type="checkbox"/> Yes- NSLP | \$0 |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **December 5, 2024** to Liz McLaughlin at Liz.McLaughlin@azed.gov. The response must be on organizational letterhead and signed by an authorized representative and must indicate that corrective actions will be implemented SFA-wide.

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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