



## Arizona Department of Education Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: EduPreneurship, Inc.

CTD: 07-87-17

Site: EduPreneurship Student Center (ESC) Phoenix

Contacts: Deborah Salas, Head of School and Mary Bernal, Administrative Assistant

Review Date: December 10, 2019

Review Period: November 2019

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 |
|--|--------------------------------|-------------------------------|----------------------------|
| <b>Performance Standard 1: Certification &amp; Benefit Issuance- Critical Area</b> |                                |                               |                            |

*No findings.*

#### Performance Standard 1: Meal Counting & Claiming- Critical Area

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| 1 | Lunch count totals for the month of review were not correctly combined and recorded. This was deemed a non-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 meal service lines provide an accurate count.</i> |
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#### Performance Standard 2: Meal Components & Quantities- Critical Area

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| 2 | Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, daily grain quantities were not met at breakfast on 11/4/19 due to Kix cereal (only crediting as 0.5 oz. eq. grain) being offered. This was not a repeat finding from cycle two 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 (i.e. serving an additional grain when Kix is served, only serving cereals that credit 1.0+ oz. eq., etc.). Meal pattern requirements for the National School Breakfast Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/mealpattern">www.azed.gov/hns/nslp/mealpattern</a> . The Step by Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainings/online/">http://www.azed.gov/hns/nslp/trainings/online/</a> . Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents). | <i>Please provide a written description of the changes that have been made to ensure that daily grain quantities at breakfast meet minimum amounts required by the meal pattern.</i> |
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| During the week of review, juice was served more than 50% of the time during lunch. | Discussed that juice may not be used to meet more than half of the weekly fruit requirement. Referred to Meal pattern requirements for the National School Lunch Program, which can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/mealpattern/">http://www.azed.gov/hns/nslp/mealpattern/</a> . Please note that repeated violations involving juice requirement may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents). | <i>Please provide one week of lunch production records which demonstrates that juice is not served more than 50% of the time. Additionally, please provide a written description of the changes that have been made to ensure that juice requirements are met.</i> |
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| <b>Performance Standard 2: Dietary Specifications &amp; Nutrient Analysis- Critical Area</b> |
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| <i>No findings.</i>  |
| <b>Meal Access &amp; Reimbursement: Certification &amp; Benefit Issuance</b>                 |
| <i>No findings.</i>  |
| <b>Meal Access &amp; Reimbursement: Verification</b>   |
| <i>No findings.</i>  |
| <b>Meal Access &amp; Reimbursement: Meal Counting &amp; Claiming</b>                         |
| <i>No findings.</i>  |
| <b>Meal Pattern &amp; Nutritional Quality: Offer Versus Serve</b>                            |
| <i>Not applicable.</i>   |
| <b>Meal Pattern &amp; Nutritional Quality: Meal Components &amp; Quantities</b>              |
| <i>No findings.</i>  |
| <b>Resource Management</b>   |
| <i>No findings.</i>  |
| <b>General Program Compliance: Civil Rights</b>  |
| <i>No findings.</i>  |
| <b>General Program Compliance: SFA On-Site Monitoring</b>                                    |
| <i>No findings.</i>  |

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**General Program Compliance: Local Wellness Policy**

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| 4 | A recent assessment of the implementation of the 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. Sample evaluation tools can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/lwp/">http://www.azed.gov/hns/nslp/lwp/</a> . | <i>None required at this time.</i> |
|   | The public was not notified of the results of the most recent assessment of the implementation of the LWP.                            | Discussed requirement to make the most recent assessment available to the public. Also discussed feasible means for notifying the public of the results of the most recent assessment on the implementation of the LWP. Templates for assessment summaries can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/lwp/">http://www.azed.gov/hns/nslp/lwp/</a> under the "Assessment" tab.                         | <i>None required at this time.</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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*No findings.*

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**General Program Compliance: Water**

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*No findings.*

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**General Program Compliance: Food Safety, Storage and Buy American**

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| 6 | Although a copy of the written food safety plan was on site, it was stored in the front office and was not easily accessible during meal preparation and service.  | Discussed that the written food safety plan should be easily available at each food preparation and food service site and that staff should be aware of its existence.  | <i>Please provide written assurance that a copy of the written food safety plan has been made available in the meal service area.</i>  |
|   | The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed school: Suncup juices (multiple non-domestic origins). Additionally, sufficient documentation justifying a Buy American exception was not maintained. | Discussed the Buy American provision requirements and procedures to ensure compliance. Referred to SP38-2017, Buy American Webinar and FAQ. Funds used from the nonprofit food service account must be used to procure 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="http://www.azed.gov/hns/nslp/forms/">http://www.azed.gov/hns/nslp/forms/</a> . Buy American Recorded Webinar and FAQ can be found on ADE's website at <a href="http://www.azed.gov/hns/sfp/">http://www.azed.gov/hns/sfp/</a> . | <i>Please provide a written description of the changes that have been made to procurement and/or recordkeeping procedures to ensure that the requirements of the Buy American Provision are met. Additionally, please provide documentation to support an exception for Suncup juices.</i> |
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**General Program Compliance: Reporting & Recordkeeping**

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| 8 | Published menu states cereal is a daily option at breakfast when only one entrée is served at breakfast at this site. | Discussed that although menus are subject to change, the menu should not list options that the SFA knows will not be offered. | <i>Please provide a menu showing that cereal is not a daily breakfast option at this site. If the site decides to offer cereal daily, please provide 5 days of breakfast production records to support this change.</i> |
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**General Program Compliance: School Breakfast Program & 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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| 9  | Snack count totals for the month of review were not correctly combined and recorded.. This contributed towards fiscal action calculations.  | Discussed ways to improve the counting system or alter it to ensure accurate counts are submitted in the claim for reimbursement.   | <i>Please provide a written description of the system that will be implemented to ensure accurate snack counts are claimed for reimbursement.</i>   |
| 10 | Production records do not support that the Afterschool Snack Program (ASP) meal pattern was met on the following dates: 11/5/19 and 11/8/19. Specifically, the Ritz crackers & cheese cup served on 11/5/19 was unable to be credited due to insufficient documentation and the Kirkland granola bar served on 11/8/19 only credited as 0.25 oz. eq. grain. | Discussed the meal pattern requirements of the ASP. The ASP meal pattern table can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/ascsp/">http://www.azed.gov/hns/nslp/ascsp/</a> . | <i>Please provide ASP production records for 5 consecutive days that demonstrate that the ASP meal pattern requirements have been met. Additionally, please provide written assurance that the ASP meal pattern will be adhered to at all times.</i>  |
| 11 | The Afterschool Snack Program monitoring review was not conducted within the first four weeks of operation and one additional time during the school year.  | Discussed ASP monitoring requirements. A sample ASP monitoring form can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/ascsp/">http://www.azed.gov/hns/nslp/ascsp/</a> .            | <i>Please provide written assurance that the ASP will be monitored once within the first four weeks of operation and one additional time during the school year, and that documentation to support this will be maintained. Additionally, please provide a completed ASP monitoring form for School Year 2019–2020.</i> |

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

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Will be reviewed in Summer 2020 if applicable.

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**Other Federal Program Reviews: Fresh Fruit & 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:

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Congratulations! EduPreneurship, Inc. has completed the Administrative Review for the 2109–2020 school year. 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**  
<http://www.azed.gov/hns/nslp/>.

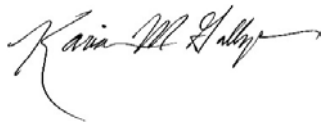
**Training: In-person classes, Web-based training, and How-To guides can be found on ADE's website at**  
<http://www.azed.gov/hns/nslp/trainingsps/>.

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 | -\$3.08 |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by February 11, 2020 to Kariann Gallegos at [Kariann.Gallegos@azed.gov](mailto:Kariann.Gallegos@azed.gov) or 1535 West Jefferson Street Bin #7, Phoenix, AZ 85007.



12/19/2019

Reviewer Signature

Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the National School Lunch Program Administrative Review Appeal Procedures found here:

<https://cms.azed.gov/home/GetDocumentFile?id=58dbe2581130c01500d4b08b>

Kathy Hoffman, Superintendent of Public Instruction  
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