



Arizona Department of Education
Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Phoenix Educational Resource Center

CTD: 10-40-01

Site: San Simon School

Contacts: Frank Rogers, Principal & Jim Hastings, Education Line Officer

Review Date: November 25, 2019

Review Period: October 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
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Performance Standard 1: Certification & Benefit Issuance- Critical Area

No findings.

Performance Standard 1: Meal Counting & Claiming- Critical Area

Observation.	Discussed the ability to track total meals rather than by individual student since the school is on CEP.	<i>None required.</i>
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Performance Standard 2: Meal Components & Quantities- Critical Area

1	On the day of review, it was observed that 2 meals counted for reimbursement did not contain all of the required meal components during breakfast service (missing milk). This 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. Discussed with cafeteria staff about double-checking that students are selecting a milk with their meal. The Recognizing a Reimbursable Meal at the Point of Service Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/snparchivedwebinars/ .	<i>Please provide a written description of the changes that have been made to ensure that all meals counted for reimbursement contain all of the required meal components.</i>
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Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area

No findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

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| 2 | Households are not notified of free meal benefits at the beginning of the school year per operating the Community Eligibility Program. | Discussed requirement to notify families of program benefits and required content for notification. Provided sample parent letter which can be found on ADE's website at http://www.azed.gov/hns/nslp/forms/ . | <i>Please provide a copy of the parent letter that will be distributed to households in the beginning of each school year stating all students will receive free meal benefits. Additionally, please provide written assurance that households will be notified of program benefits according to requirements henceforth.</i> |
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Meal Access & Reimbursement: Verification

No findings.

Meal Access & Reimbursement: Meal Counting & Claiming

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| 3 | Daily edit checks are not being conducted. | Discussed how to complete daily edit checks using ADE's Simplified Daily Edit Check worksheet. The Simplified Daily Edit Check Worksheet can be found on ADE's website at http://www.azed.gov/hns/nslp/forms/ . The Step by Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/ . | <i>Please provide a completed daily edit check worksheet for the month of December. Additionally, please provide written assurance that daily edit checks will be conducted.</i> |
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Meal Pattern & Nutritional Quality: Offer Versus Serve

No findings.

Meal Pattern & Nutritional Quality: Meal Components & Quantities

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| 4 | Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast and lunch. | Discussed feasible options for signage and posting. Printable POS Signage can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpattern/ . | <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> |
| | Observation. | Menus are not provided for students. Encourage SFA to create menus to post and make available to students each month. | <i>None required.</i> |

Resource Management

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| 5 | LEA did not provide reviewer with requested information for the resource management review. | Discussed the importance of establishing a financial management system and internal controls needed to accurately track all revenues and expenditures and ensuring that only allowable charges are made to the nonprofit food service account. Refer to ADE's Resource Management Webpage at http://www.azed.gov/hns/nslp/rm/ . | <i>Please provide a written description of how all revenues and expenditures are tracked. Please provide written procedures for ensuring that only allowable charges are made to the nonprofit food service account.</i> |
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6	Reviewer was unable to select a sample of expenses to review because LEA did not provide any resource management documentation.	Discussed importance of having proper documentation on file and referred to ADE's Resource Management Webpage at http://www.azed.gov/hns/nslp/rm/ .	<i>Please provide a copy of the detailed general ledger or comparable document for School Year 2018-19. Provide supporting documentation for one month of expenses for all purchases using non profit food service account funds.</i>
7	Documentation to support the Annual Financial Report was not provided.	Discussed importance of having proper documentation on file and that the report was due on October 15th. Refer to ADE's Grants Management webpage for more information: http://www.azed.gov/grants-management/ .	<i>Please provide a copy of the AFR submitted for school year 2018-19. Additionally, provide all supporting documentation for the AFR.</i>

General Program Compliance: Civil Rights

8	Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements.	Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., SA, FNSRO, FNS Office of Civil Rights, or USDA Office of Civil Rights). 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: http://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 http://www.azed.gov/hns/nslp/trainingps/online/ .	<i>Please provide a written description of the updated process and procedures for processing complaints alleging discrimination which meets requirements.</i>
9	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 http://www.azed.gov/hns/civilrights/ .	<i>Please provide written assurance that all food service staff will be trained at hire and annually on Civil Rights Compliance in Child Nutrition Programs. Please provide a copy of the civil rights training that staff were trained on as well as documentation to show staff were trained on civil rights.</i>
10	Sufficient documentation to support accommodations for special diets has not been maintained.	Discussed requirements for accommodating special diets and the need for sufficient documentation. Referred to ADE's Medical Statement template under Program Forms: http://www.azed.gov/hns/nslp/forms/	<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.</i>

General Program Compliance: SFA On-Site Monitoring

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| 11 On-site reviews of the lunch meal counting and claiming procedures for all sites within the SFA are not being conducted each year prior to February 1. | Discussed requirement and where to find a template Internal On-Site Monitoring Form-Lunch of the Meal Counting and Claiming System found on ADE's website under Additional Forms: http://www.azed.gov/hns/nslp/forms/ | <i>Please provide a completed Internal On-Site Monitoring Form of the Meal Counting and Claiming System for lunch. Additionally, please provide a written description of the process that has been put in place to ensure that all sites receive an on-site review of the meal counting and claiming procedures each year prior to February 1.</i> |
| 12 On-site reviews of the breakfast meal counting and claiming procedures for 50% of the sites within the SFA are not being conducted each year prior to February 1. | Discussed requirement and where to find a template Internal On-Site Monitoring Form-Breakfast of the Meal Counting and Claiming System found on ADE's website under Additional Forms: http://www.azed.gov/hn | <i>Please provide a completed Internal On-Site Monitoring Form of the Meal Counting and Claiming System for breakfast. Additionally, please provide a written description of the process that has been put in place to ensure that 50% of the sites operating breakfast will receive an on-site review of the meal counting and claiming procedures each year prior to February 1.</i> |

General Program Compliance: Local Wellness Policy

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| 13 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 http://www.azed.gov/hns/nslp/lwp/ . | <i>None required at this time.</i> |
| 14 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 once it is completed. The USDA's Local Wellness Policy Outreach Toolkit can be found at https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit . | <i>None required at this time.</i> |

General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

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| 15 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. Trainings for School Nutrition Professionals can be found on ADE's website at http://www.azed.gov/hns/nslp/training/ | <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.</i> |
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16	Six full-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 6 hour training requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at http://www.azed.gov/hns/nslp/training/ .	<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 full-time School Nutrition Program staff are registered for.</i>
17	Four employees outside of the School Nutrition Program whose responsibilities assist in the operation of the NSLP/SBP have not received applicable training.	Discussed 4 hour training requirement, employees' job duties and applicable trainings that could be provided and feasible timeline. Trainings for School Nutrition Professionals can be found on ADE's website at http://www.azed.gov/hns/nslp/training/ .	<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 these employees will receive.</i>
18	Professional Standards training hours are not being adequately tracked.	Referred to ADE's Training Tracking forms found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/ . The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/ .	<i>Please provide the tracker that will be used to track Professional Standards training hours on an annual basis for all School Nutrition Program staff. Please 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.</i>

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

19	The written food safety plan did not include adequate SOPs for: field trips, thermometers, deliveries, date marking, cleaning, and cooking/serving temperatures.	Discussed sample SOPs and referred to Food Safety webpage, which can be found on ADE's website at http://www.azed.gov/hns/nslp/foodsafety/ .	<i>Please provide a copy of the SOPs that will be added to the food safety plan. Please provide written assurance that the food safety plan will be site specific.</i>
20	Documentation was not maintained to support that the school received two food safety inspections from the local health department each school year, or that the school requested two food safety inspections each year from the local health department.	Discussed that each site operating must obtain two food safety inspections from the local health department per school year or maintain documentation to show that two food safety inspections were requested from the local health department each school year.	<i>Please provide a written description of how you will document that two food safety inspections from the local health department will be requested each school year.</i>

21	The most recent food safety inspection report was not posted in a publicly visible location.	Discussed making copies of most recent report and feasible places for posting.	<i>Please provide written assurance that the most recent food safety inspection report has been posted in a location where the program participants can view it. Additionally, please specify where the report has been posted.</i>
22	Temperature logs are not being maintained. Specifically, temperature logs for dry storage are not maintained.	Discussed requirements for maintaining dry storage area temperature logs. Temperature logs for dry storage areas must be maintained for 6 months. Monitoring forms can be found on ADE's website at http://www.azed.gov/hns/nslp/foodsafety/ .	<i>Please provide a copy of the temperature log that will be used for dry storage areas as well as written assurance that logs will be kept daily and maintained on-file for 6 months.</i>
23	The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed school: banana, pineapple, mandarin oranges. Additionally, 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 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 http://www.azed.gov/hns/nslp/forms/ . Buy American Recorded Webinar and FAQ can be found on ADE's website at http://www.azed.gov/hns/sfp/	<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.</i>

General Program Compliance: Reporting & Recordkeeping

24	Production records for breakfast and lunch provided were not consistently filled out correctly: Specifically, production records planned and left over sections are not consistently filled out correctly.	Discussed required sections of production records. Parts of a Production Record Guidance can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpattern/ . Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/snparchivedwebinars/ .	<i>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.</i>
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| 25 | Records documenting meal components were not kept on file. Reviewer requested these before the on site review, but SFA was unable to provide any menu documentation until after the review. | Discussed record keeping requirements and working with vendor to ensure that SFA has supporting documentation for all menu items and maintains these records for 5 years. | Please provide written assurance that all documents pertaining to the school meal programs will be retained on file for at least 5 years, as is required by Arizona law, as well as a written plan for ensuring that this requirement is met. |
| 26 | The Annual Financial Report was not submitted to ADE on time. | Discussed reporting requirements for the Annual Financial Report, which was due on October 15th. Refer to ADE's Grants Management webpage for more information:
http://www.azed.gov/grants-management/ . | Please provide written assurance that the Annual Financial Report will be submitted on time to ADE each year, as well as the steps that will be taken to ensure this requirement is adhered to. |

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

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| 27 | Outreach to families regarding the availability of the SBP was not conducted at the beginning of or during the school year. | Discussed methods of notifying families of the availability of the SBP at the start of and throughout the school year and determined which was most feasible. | Please provide documentation that demonstrates how households are notified of the availability of the SBP at the beginning of and during 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 and during the school year, and written assurance that this will occur. |
| 28 | Households were not notified of the availability of the SFSP prior to the end of the school year. | 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 http://www.eatwellbewell.org/ . - AND/OR- Call 1(800) 5-HUNGRY for more information and/or go to http://www.whyyhunger.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

Will be reviewed in Summer 2020 if applicable.

Other Federal Program Reviews: Fresh Fruit & 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 on completing the Administrative Review! Thank you for providing free meals to students. Please continue to work with ADE staff and resources in order to assist in the operation of your program.

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?

<input checked="" type="checkbox"/> No- SBP	<input type="checkbox"/> Yes- SBP	\$4.40
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$0

Please submit corrective action response by January 24, 2020 to Lindsey.Cler@azed.gov or 1535 W. Jefferson St, 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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