



Arizona Department of Education
Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Create Academy

CTD: 07-82-53

Site: Create Academy

Contacts: Christopher Hodo, Principal

Review Date: February 20, 2020

Review Period: January 2020

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
Performance Standard 1: Certification & Benefit Issuance- Critical Area			

No Finding.

Performance Standard 1: Meal Counting & Claiming- Critical Area

No Finding.

Performance Standard 2: Meal Components & Quantities- Critical Area

1	On the day of review, it was observed that five meals counted for reimbursement did not contain all of the required meal components. Specifically, during Breakfast meal service meals counted did not have the required 1/2 cup minimum of fruit. 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 how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable 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. Additionally, the certificate of completion of Recognizing a Reimbursable Meal at the Point of Service must be submitted.</i>
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Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area

No Finding.

Meal Access & Reimbursement: Certification & Benefit Issuance

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| 2 | Direct certification matches were not conducted according the proper time frame. Specifically, the SFA conducted Direct Certification until April 11, 2019 past the required April 1 date. | Referred to Direct Certification for Assistance Programs section in USDA's Eligibility Manual for School Meals. The NSLP At A Glance Calendar which contains timeframes to run DC can be found on ADE's webpage at http://www.azed.gov/hns/nslp/ . | <i>Please provide a written description of the changes that have been implemented to ensure direct certification will be conducted according to the proper time frames. Additionally, please provide written assurance that, moving forward, direct certification will be run according to the prescribed timeframe for all students enrolled.</i> |
| 3 | Direct certification match lists are not being retained on file. | Discussed potential process for retention of direct certification match lists. | <i>Please provide the most recent direct certification match lists to demonstrate retention requirements. Additionally, please provide written assurance that direct certification match lists will be retained on file per record retention requirements.</i> |
| 4 | 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 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/trainingns/online/ | <i>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> |

Meal Access & Reimbursement: Verification

No Finding.

Meal Access & Reimbursement: Meal Counting & Claiming

No Finding.

Meal Pattern & Nutritional Quality: Offer Versus Serve

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| 5 | OVS was not implemented properly. Specifically, during breakfast meal service POS staff did not allow students the option to decline milk. | Provided technical assistance on proper implementation of OVS and discussed with kitchen and point of service staff. Reviewed menu and discussed options for a reimbursable meal under OVS. USDA's Offer Versus Serve Manual, Effective beginning School Year 2015-2016 can be found on ADE's website at http://www.azed.gov/hns/nslp/programguidance/ . | <i>Please provide a written description demonstrating how OVS will be implemented properly. Additionally, please provide written assurance that moving forward, OVS will be implemented properly.</i> |
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6	Signage which explains what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable 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 http://www.azed.gov/hns/nslp/mealpattern/	<i>Please provide the sign that has been displayed explaining what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i>
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Meal Pattern & Nutritional Quality: Meal Components & Quantities

7	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 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>
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Resource Management

8	Net cash resources available in the nonprofit school food service account exceed the three month expenditure limit and approval from the ADE was not obtained.	Discussed requirement that net cash resources must be limited to an amount that does not exceed 3 months average expenditures without prior approval from the ADE. Referred to 7 CFR 210.19.	<i>Please provide documentation reflecting that net cash resources are below the 3 month average expenditure limit or provide a detailed spending plan to ADE for approval to maintain a balance in excess of the net cash resource limit.</i>
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General Program Compliance: Civil Rights

9	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 http://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>
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10 Procedures for receiving and processing complaints alleging discrimination within the school meal programs are not in place.	<p>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: 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/.</p>	<p><i>Please provide a written description of the process and procedures for processing complaints alleging discrimination within FNS School Meal Programs. Additionally, the certificate of completion of Step by Step Instruction: How to File a Civil Rights Complaint must be submitted.</i></p>
11 Program staff have not been trained on civil rights topics.	<p>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/.</p>	<p><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></p>
12 The Civil Rights Compliance form is not being completed every year by December 15 and kept on file.	<p>Discussed requirement for completing form and how to collect racial/ethnic data from program participants. Showed where form can be found on ADE's website at http://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 http://www.azed.gov/hns/nslp/trainingps/online/.</p>	<p><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></p>
No Finding.	<p>Observed no special diets at this time. Discussed requirements for accommodating special diets and the need for maintaining sufficient documentation.</p>	<p><i>None required at this time.</i></p>

General Program Compliance: SFA On-Site Monitoring

Not Applicable.

General Program Compliance: Local Wellness Policy

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| 13 A Local Wellness Policy (LWP) has not been developed. | Discussed preliminary planning, such as who will be named as the designated LWP official and how required stakeholders will be invited to participate in the process. Reviewed handouts and discussed developing a LWP with required elements. Guidance on requirements for Local Wellness Policies can be found at http://www.azed.gov/hns/nslp/lwp . Alliance for a Healthier Generation resources and a Model Local Wellness Policy can be found at https://www.healthiergeneration.org/take_action/schools/wellness_committees_policies/ . | <i>Please provide a written plan for development of a Local Wellness Policy. This plan must include who will be designated as the oversight official, who will be invited to participate in the development process and the date by which you expect the policy to be completely developed and adopted. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.</i> |
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General Program Compliance: Competitive Food Services

Not Applicable.

General Program Compliance: Professional Standards

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| 14 The School Nutrition Program Director hired after July 1, 2015 did not meet the hiring standard requirement. | Referred to hiring standard requirements and discussed with appropriate district HR/school staff. 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 ADE New Director Hiring Form and attach all supporting education/work experiences relevant in food service experience which meet Director hiring compliance with the USDA Professional Standards Final Rule.. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i> |
| 15 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 Courses can be found on ICN's website at http://www.theicn.org/ResourceOverview.aspx?ID=573 . | <i>Please provide the expected date that food safety certification training will be completed by the School Nutrition Program Director.</i> |

16	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/ . 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 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>
17	The School Nutrition Program Manager did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.	Discussed 10 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 the School Nutrition Program Manager is registered for.</i>
18	Professional Standards training hours are not being tracked on an annual basis.	Referred to ADE's Training Tracking forms found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/ .	<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.</i>

General Program Compliance: Water

No Findings.

General Program Compliance: Food Safety, Storage and Buy American

19	A written food safety plan has not been developed.	Discussed required components of a food safety plan and resources available on ADE's website at http://www.azed.gov/hns/nslp/foodsafety/ .	<i>Please provide a copy of a written food safety plan.</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. Specifically, one food safety inspection that is site specific was conducted on January 22, 2020 on file.	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 ensure that two food safety inspections from the local health department will be obtained each school year.</i>
21	The most recent food safety inspection report was not posted in a publicly visible location. Specifically, the food safety inspection of the catering company was posted and not for the Create Academy site.	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	The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) reviewed: Suncup Juices. 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 http://www.azed.gov/hns/nsfp/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 recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i>
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General Program Compliance: Reporting & Recordkeeping

23	Production records are not maintained. Specifically, production records for the review period were not provided or maintained on file due to scanner issues.	Discussed requirements of maintaining production records documentation to demonstrate how meals offered to students meet meal pattern requirements. Production Record Template can be found on ADE's website at http://www.azed.gov/hns/nsfp/mealpattern/ . The Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nsfp/trainingps/snarchivedwebinars/ .	<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>
24	Records documenting meal components were not kept on file for the minimum required 5 years. Specifically, Production Records were not maintained.	Discussed record keeping requirements and timeframe of 5 years.	<i>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 your plan for ensuring that this requirement is met.</i>
25	Site application in CNPWeb indicated that SFA is offers breakfast in the classroom when the SFA is serving breakfast meal service in the cafeteria.	Discussed steps required to update sponsor and site application in CNPWeb to reflect current practice of breakfast meal service in the cafeteria.	<i>Please resubmit a site/sponsor application indicating that breakfast service in cafeteria. Additionally, please provide written assurance that the sponsor application in ADE's CNPWeb will accurately reflect current practices.</i>

General Program Compliance: School Breakfast Program & 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 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 Create Academy has completed their Administrative Review for the 2019-2020 School Year. Please ensure to maintain program compliance and continue providing your students access to nutritious meals. Based on your menu documentation provided for the week of review, it appears that you have opted to utilize the flexibility to serve a select number of enriched grain rich items. Please consider switching to serve 100% whole grain-rich items and join your peers who have already signed ADE's Whole Grain Pledge at: <https://www.surveymonkey.com/r/WholeGrainRichPledge>. ADE appreciates your efforts in providing quality meals to Arizona students. Thank you!

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/>.

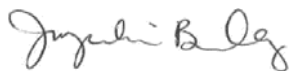
Training: In-person classes, Web-based training, and How-To guides can be found on ADE's website at <http://www.azed.gov/hns/nslp/trainings/>.

Fiscal Action Assessed?

<input checked="" type="checkbox"/> No- SBP	<input type="checkbox"/> Yes- SBP	\$11.00
<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 May 29, 2020 to Joyce Benally at 400 W. Congress St. Bin #33, Tucson, Arizona, 85701 and/or Joyce.Benally@azed.gov.



4/22/2020

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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