



Arizona Department of Education
Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Ball Charter School (Dobson)

CTD: 07-89-88

Site: Dobson Academy, The – A Ball Charter School

Contacts: Dawn Winn, Principal and Adrienne Rivera, Nutrition Coordinator

Review Date: March 31, 2020

Review Period: February 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			
1	Multiple applications were certified incorrectly or utilized incomplete information. Specifically, 5 applications were approved with missing Social Security number information. This did not contribute toward fiscal action calculations.	Discussed errors found and required corrective action. Referred to Processing Applications and Reviewing Applications Based on Income sections in USDA's Eligibility Manual for School Meals. Suggested completing the training: Step by Step Instruction: How to Process Household Applications found on ADE's website at http://www.azed.gov/hns/nslp/trainings/online/ under the 3000-Administration tab.	Corrections have been made to certification errors. Please describe the process that will be implemented to reduce the amount of errors that occur while determining the eligibility status for each student.
Performance Standard 1: Meal Counting & Claiming- Critical Area			
No findings.			
Performance Standard 2: Meal Components & Quantities- Critical Area			
No findings.			
Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area			
No findings.			
Meal Access & Reimbursement: Certification & Benefit Issuance			
2	An individual separate from the application approval process has not been designated as the hearing official. Specifically, the Notification of Benefits letter lists the hearing official as the same individual as the Determining Official.	Referred to Hearing Procedure section in USDA's Eligibility Manual for School Meals. Discussed school official who could be designated.	Please provide the name and title of the individual designated as the hearing official. Additionally, please provide an updated Notification of Benefits letter.

Meal Access & Reimbursement: Verification

<p>3 The verification sample size used was not correct based on the number of applications eligible for verification. Specifically, 3 applications (three percent of all applications approved by the LEA for the school year as of October 1 selected at random) should have been verified, but 5 applications (five percent of all case number applications approved by the LEA for the school year as of October 1) were actually verified.</p>	<p>Discussed correct calculation of sample size and which applications are subject to verification. Discussed attending ADE's Drop-in Workshop: Preparing for Verification. Referred to Verification Sample Size Calculator and Online Training: Verification Review found on ADE's website at http://www.azed.gov/hns/nslp/verification/. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at http://www.azed.gov/hns/nslp/programguidance/.</p>	<p><i>Please provide written procedures for how the verification sample size will be determined in the future.</i></p>
<p>4 The person designated as the confirming official is the same person who makes eligibility determinations.</p>	<p>Discussed requirement for having a designated official for conducting confirmation reviews who is not the same person who determined eligibility. Referred to The Online Training: Verification Review found on ADE's website at http://www.azed.gov/hns/nslp/verification/. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at http://www.azed.gov/hns/nslp/programguidance/.</p>	<p><i>Please provide written assurance that the person designated as the confirming official will not be the same person who determines eligibility. Additionally, please provide the name and title of the individual designated as the confirming official.</i></p>
<p>5 Applications selected for verification were not verified correctly. Specifically, 1 categorically free application included a student who withdrew from the school during verification activities; rather than replacing the application, the application was processed as no response, changed to paid.</p>	<p>Discussed proper verification procedures including that if a household selected for verification transfers out of a school district before the information can be verified, verification cannot be completed. To meet minimum verification requirements, a new application must be selected. Referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at http://www.azed.gov/hns/nslp/programguidance/.</p>	<p><i>Please provide written procedures for how an application selected for verification will be processed in the future if the student transfers out of the school district before their information can be verified.</i></p>
<p>6 Applications selected for verification were not verified correctly. Specifically, 1 categorically free application provided income information which the SFA processed as confirmed free without any supporting documentation (e.g., paystubs).</p>	<p>Discussed proper verification procedures including that households selected for verification must provide proof of income or proof of participation in Assistance Programs to confirm eligibility status. Referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at http://www.azed.gov/hns/nslp/programguidance/.</p>	<p><i>Please provide written procedures for how an application selected for verification will be processed in the future if the household reapplies using information that does not match what was reported on the original application.</i></p>

7	Applications selected for verification were not verified correctly. Specifically, 1 categorically free application provided a document from an Assistance Program that did not specify the certification period which the SFA process as confirmed free.	Discussed proper verification procedures including that a document from an Assistance Program that does not specify the certification period does not meet the documentation required for verification. Referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at http://www.azed.gov/hns/nslp/programguidance/ .	<i>Please provide written procedures for how a categorically free application selected for verification will be processed in the future if the household provides a document from an Assistance Program that does not specify the certification period.</i>
8	Verification was not completed by November 15. Specifically, SFA began verification activities on January 15.	Discussed requirement for completion of verification activities by November 15, as well as specifics on what those activities are. Referred to Verification Best Practices Calendar and Online Training: Verification Review found on ADE's Verification webpage: http://www.azed.gov/hns/nslp/verification/ .	<i>Please provide written assurance that verification will be completed by November 15 each year, as well as the steps that will be taken to ensure this requirement is adhered to.</i>
9	The most recent verification report was not accurate. Specifically, results were reported as 2 directly verified applications, 1 categorically free application that changed to paid, and 2 applications that did not respond and changed to paid when the SFA provided documentation to support that 2 applications were directly verified, 2 applications were processed as categorically free confirmed free, and 1 application was withdrawn and changed to paid.	Discussed that verification report must reflect actual verification process and results, discussed specific discrepancies. Discussed attending ADE's Drop-in Workshop: Submitting for Verification. Referred to Step by Step Instruction: How to Submit the Verification Report on CNP Verification found on ADE's website at http://www.azed.gov/hns/nslp/verification/ . Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at http://www.azed.gov/hns/nslp/programguidance/ .	<i>Please provide a written description of the changes that have been implemented to ensure that the verification report will accurately reflect the verification practices and results that occurred.</i>

Meal Access & Reimbursement: Meal Counting & Claiming

No findings.

Meal Pattern & Nutritional Quality: Offer Versus Serve

10	Offer Versus Serve (OVS) was not implemented properly. Specifically, point of service staff are not trained on counting reimbursable meals.	Provided technical assistance on proper implementation of OVS and importance of training program staff on the requirements of 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 and when point of service staff will be trained on recognizing a reimbursable meal while implementing OVS.</i>
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Meal Pattern & Nutritional Quality: Meal Components & Quantities		
11	<p>Meals served to preschool (Pre-K) students did not meet requirements. Specifically, juice was served during more than one meal service for Pre-K students every day.</p> <p>Meals served to preschool (Pre-K) students did not meet requirements. Specifically, flavored milk was served to Pre-K students who were not comingled at lunch every day.</p>	<p>Discussed Pre-K meal pattern, specifically that juice cannot be served in more than one meal service and grain based desserts may not be credited at breakfast. Referred to SP 01-2018 Updated Infant and Preschool Meal Patterns in the National School Lunch Program and School Breakfast Program; Questions and Answers. Resources for the new Pre-k meal pattern can be found at: http://www.azed.gov/hns/cacfp/cacfpmealpattern/.</p> <p>Discussed new Pre-K meal pattern, specifically that flavored milk is not allowable. Referred to SP 01-2018 Updated Infant and Preschool Meal Patterns in the National School Lunch Program and School Breakfast Program; Questions and Answers. Resources for the new Pre-k meal pattern can be found at: http://www.azed.gov/hns/cacfp/cacfpmealpattern/.</p>
Resource Management		
13	<p>Meals served to teachers, administrators, custodians, and other adults were not priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or payroll funds, or funding from voluntary agencies) was sufficient to cover the overall cost of the meal. Specifically, the SFA was charging the price recommended by their caterer. Adult breakfasts were priced at \$2.00 instead of the Adult Meal Pricing Tool recommended price of \$2.35. Adult Lunches were priced at \$2.00 which is far below the Adult Meal Pricing Tool's recommended price of \$4.15.</p>	<p>Discussed ways to determine adult meal prices which included the highest student 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.</p> <p>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.</p>
14	<p>The Revenue Ratio (proportion of total revenue from the sale of nonprogram foods to the total revenue of the school food service account) was not equal to or greater than the Food Cost Ratio (proportion of total food costs associated with obtaining nonprogram foods to the total costs associated with obtaining program and nonprogram foods from the account).</p>	<p>Discussed revenue from nonprogram foods requirements and provided with nonprogram Food Revenue Tool. Referred to FNS Instruction 782-5 REV. 1 for more information about pricing for nonprogram adult meals. Discussed best practices for pricing nonprogram foods and ways to increase revenue from the sale of nonprogram foods.</p> <p>Please indicate how you will ensure that the Revenue Ratio will be equal to or greater than the Food Cost Ratio. The explanation could include raising nonprogram food prices and/or adult meal prices to sufficiently cover the cost of obtaining nonprogram foods. Alternatively, the SFA could provide non-federal funds in the amount of the revenue shortfall to the nonprofit school food service account.</p>

15	Sufficient supporting documentation was not provided to support the amounts entered into the Nonprogram Food Revenue Tool. Specifically, the SFA did not provide receipts or invoices detailing the costs of program and nonprogram foods. Additionally, the SFA did not provide adequate supporting documentation for the amounts received from the sales of program foods or from the sale of nonprogram foods. Without receiving adequate supporting documentation I was unable to verify whether the amounts entered into the Nonprogram Food Revenue Tool were appropriate.	Discussed feasible methods for separating revenues and costs, as well as how to keep appropriate records supporting both program and nonprogram food revenues and costs. Discussed revenue from nonprogram foods requirements and provided with nonprogram Food Revenue Tool. Referred to FNS Instruction 782-5 REV. 1 for more information about pricing for nonprogram adult meals.	Please provide a description of the systems that will be developed to separate nonprogram food revenues and costs from program food revenues and costs. Please also indicate how and when compliance with nonprogram revenue requirements will be assessed each year. Please also indicate the types of supporting documentation that will be kept to support both nonprogram and program revenues and costs.
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General Program Compliance: Civil Rights

16	The public/media release was not provided to local media, the unemployment office and local employers considering large layoffs. Specifically, it was provided to the school board and school website.	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/nsfp/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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General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

17	The Local Wellness Policy (LWP) did not contain goals for nutrition education.	Discussed developing a LWP with goals for nutrition education. Discussed nutrition education activity ideas which included integrating nutrition into health education classes, promoting skill development and integrating nutrition into core subjects.	<i>Please provide a written plan for how the missing elements of the LWP will be included. The plan should include draft language of the element to be added, who will be involved in updating the LWP, and the date the update is expected to be completed. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.</i>
18	The LWP did not contain goals for nutrition promotion.	Discussed feasible options for nutrition promotion goals that can be written into the LWP. Discussed activity ideas which included offering contests, surveys, promotions and/or taste testing, providing information to families to encourage consumption of healthy foods at home, and displaying nutrition and health posters throughout campus. Team Nutrition Resources can be found at http://teamnutrition.usda.gov .	<i>None required at this time.</i>

19	The LWP did not contain policies for food and beverage marketing.	Discussed updating the LWP to include policies that allow marketing and advertising of only those foods and beverages that meet Smart Snacks Standards during the school day. Explained that this requirement applies to exterior vending machines, posters, menu boards, coolers, trash cans and cups used for beverage dispensing.	<i>None required at this time.</i>
20	Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the LWP.	Discussed feasible means of notifying potential stakeholders of their ability to participate.	<i>None required at this time.</i>
21	Observation: A recent assessment of the implementation of the LWP has not been conducted nor have plans been developed to complete the assessment and share results with the public. However, pursuant to the Families First Coronavirus Response Act and based on the exceptional circumstances of this public health emergency related to the novel coronavirus (COVID-19), the Food and Nutrition Service (FNS) has established a nationwide waiver to support schools unable to complete a triennial assesment of the local schoool wellness policies by June 30, 2020, due to school closures as a result of COVID-19.	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/ . Also discussed feasible means for notifying the public of the results of the most recent assessment.	<i>None required at this time.</i>

General Program Compliance: Competitive Food Services

22	Foods and beverages sold and served to students in grades K-8 during the school day do not meet Smart Snacks standards. Specifically, cookies, Cheez-Its, goldfish, Rice Krispies, and Chewy bars did not meet Smart Snacks standards.	Discussed Smart Snacks requirements for grades K-8 and why a la carte items did not meet standards. The Alliance for a Healthier Generation Smart Snacks Product Calculator can be found on ADE's website at http://www.azed.gov/hns/nslp/smartsnacks/ . Smart Snacks Summary Chart 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 http://www.azed.gov/hns/nslp/trainingps/online/	<i>Please provide written procedures for assessing whether a product meets Smart Snacks standards and written assurance that the currently sold cookies, Cheez-Its, goldfish, Rice Krispies, and Chewy bars will no longer be served or sold during the school day and that Smart Snacks standards will be adhered to. Additionally, the certificate of completion of Online Course: Smart Snacks and Competitive Foods Standards in Arizona must be submitted.</i>
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General Program Compliance: Professional Standards

23	Part-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 4 hour training requirement. 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 Part-Time School Nutrition Program staff are registered for.</i>
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General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

24	The most recent food safety inspection report was not posted in a publicly visible location. Specifically, the most recent food safety inspection report is located in front of a freezer inside of the kitchen.	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>
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General Program Compliance: Reporting & Recordkeeping

25	The Free and Reduced-Price Policy Statement provided by the SFA does not align with current practices and procedures. Specifically, the official designated to make eligibility determinations is not current.	Referred them to the Free and Reduced-Price Policy Statement template on ADE's website at http://www.azed.gov/hns/nslp/forms/ .	<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>
26	Production records for breakfast and lunch did not contain all required sections: total reimbursable meals served, total non-reimbursable meals served, and quantities planned, served, and left over for milk.	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/mealpat tern/ . Production Record Template can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpat tern/ . The 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>

27	<p>Production record for breakfast on 02/05/20 did not indicate that a full cup of fruit was offered. This was a result of a documentation error.</p>	<p>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 Template can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpattern/. The Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/trainings/snparchivedwebinars/.</p>	<p><i>Please provide copies of completed breakfast production records for 5 consecutive days demonstrating that a full cup of fruit is offered every day at breakfast.</i></p>
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General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach

No findings.

Other Federal Program Reviews: Afterschool Snack Program

28	<p>The counting system employed does not result in accurate snack counts. Specifically, counts used in the reimbursement claim did not match daily meal counts recorded on 02/06/20, 02/12/20, and 02/13/20. This contributed towards fiscal action calculations.</p>	<p>Discussed ways to improve the counting system or alter it to ensure accurate counts are submitted in the claim for reimbursement.</p>	<p><i>Please provide a written description of the system that will be implemented to ensure accurate snack counts are claimed for reimbursement.</i></p>
29	<p>Production records do not support that the Afterschool Snack Program (ASP) meal pattern was met on the following dates: 02/07/20. Specifically, 4 graham crackers were served as the grain component when 1 serving of graham crackers is 8 crackers.</p>	<p>Discussed the meal pattern requirements of the ASP. The ASP meal pattern table can be found on ADE's website at http://www.azed.gov/hns/nslp/ascsp/.</p>	<p><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></p>

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! Ball Charter Schools (Dobson) has completed the Administrative Review for the 2019-2020 school year. Thank you for your sense of urgency and organization during the review process. It is evident that you are working hard to ensure your students are fed healthy meals.

Based on your menu documentation provided for the week of review, you are serving 100% whole grain-rich items! If this extends to your entire menu, please take a moment to sign ADE's Whole Grain Pledge at <https://www.surveymonkey.com/r/WholeGrainRichPledge> and be recognized for providing 100% whole grain-rich items. ADE appreciates your efforts in continuing to provide 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/>.

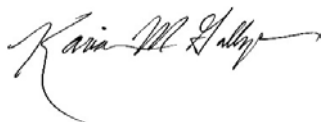
Training: In-person classes, Web-based training, and How-To guides can be found on ADE's website at <http://www.azed.gov/hns/nslp/trainings/>.

Fiscal Action Assessed?

<input checked="" type="checkbox"/> No- SBP	<input type="checkbox"/> Yes- SBP	\$0
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$4.70

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by June 29, 2020 to Kariann Gallegos at Kariann.Gallegos@azed.gov or 1535 West Jefferson Street Bin #7, Phoenix, AZ 85007.



5/28/2020

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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