



**Arizona Department of Education
Health and Nutrition Services Division**

Administrative Review Summary Report

School Food Authority Name: Edkey, Inc. - Sequoia Charter School

CTD: 07-89-15

Sites: American Heritage Academy – Camp Verde, American Heritage Academy – Cottonwood, Arizona Conservatory for Arts and Academics, Arizona Conservatory for Arts and Academics Elementary School, Arizona Conservatory for Arts and Academics Middle School, Children First Leadership Academy, Edkey, Inc. – Pathfinder Academy at Eastmark, Edkey, Inc. – Pathfinder Academy – Sequoia Lehi, Edkey, Inc. – Precision Learning Center, Edkey, Inc. – Sequoia Deaf School, George Washington Academy, KELLY, Pathfinder Academy, Sequoia Elementary School, Sequoia Pathway Academy, Sequoia Secondary School, Sequoia Village High School and Sequoia Village School

Contacts: Mark Plitzuweit, President and Martin Fraley, Executive Director of Business

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
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Performance Standard 1: Certification & Benefit Issuance- Critical Area

1	For one student, the eligibility determined was not transferred correctly to the benefit issuance document. This contributed toward fiscal action calculations.	Discussed requirement that eligibility status must be implemented within 10 operating days of receipt of an application and discussed best practices (like having someone double check) for ensuring eligibility status is transferred to the benefit issuance document on a regular basis.	<i>Corrections have been made to the benefit issuance document. Please provide a written description of the process that will be implemented to ensure that the benefit issuance document matches all current students and their eligibility status.</i>
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Performance Standard 1: Meal Counting & Claiming- Critical Area

No findings.			
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Performance Standard 2: Meal Components & Quantities- Critical Area

2	The meal service was not structured to comply with the meal pattern requirements of the multiple grade groups that were served. Specifically, Edkey, Inc. - Pathfinder Academy - Sequoia Lehi, Edkey, Inc. - Pathfinder Academy at Eastmark and Sequoia Elementary School are using the Grades K-5 Meal Pattern and should be using the Grades K-8 Meal Pattern since Grades K-6 are served at those sites.	Discussed allowable meal pattern grade groups per the grades served and feasible options for structuring the meal service to comply with quantity requirements. 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 weeks worth of lunch production records that will be used in the 20-21 SY that demonstrate the correct grade groups. Additionally, please provide a written description of the changes that have been implemented to ensure that meal pattern requirements of the multiple grade groups served are met.</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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| 3 | The household application approval process is not being completed within ten operating days of receipt of the application. | Referred to Application Processing Timeframe section in USDA's Eligibility Manual for School Meals found on ADE's website at http://www.azed.gov/hns/nslp/program_guidance/ . | <i>Please provide written procedures that will be implemented to ensure income applications are processed within ten operating days of receipt.</i> |
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Meal Access & Reimbursement: Verification

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| 4 | Although the correct verification sample size was calculated, the incorrect number of applications were verified. Specifically, 12 applications should have been verified and 11 applications were verified. | Discussed double-checking the sample size calculated by computer software system and ADE sample size calculator to list of applications provided by computer software system. 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/ . | <i>Please provide written procedures for how the verification sample size and list of applications chosen for verification will be determined in the future.</i> |
| 5 | The most recent verification report was not accurate. Specifically, the SFA indicated the incorrect number of categorically free eligible applications on file as of October 1. | Discussed that the verification report must reflect actual verification process and results. Discussed attending ADE's Drop-in Workshop: Submitting for Verification. | <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> |
| 6 | The confirmation review was not conducted correctly. Specifically, the SFA conducted a confirmation review but it took place after the households were contacted regarding verification and not prior to verification. | Discussed the requirement for having a designated official confirm the eligibility of an application selected for verification prior to contacting the household. Referred to Verification Tracking Form 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/program_guidance/ . | <i>Please provide written procedures for how the confirmation review will be conducted and written a assurance that all applications selected for verification will undergo a confirmation review by a separate designated official and that this confirmation review will be documented.</i> |
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Meal Access & Reimbursement: Meal Counting & Claiming

No findings.

Meal Pattern & Nutritional Quality: Offer Versus Serve

No findings.

Meal Pattern & Nutritional Quality: Meal Components & Quantities

No findings.

Resource Management

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| <p>7 The food service program operated at a deficit requiring a transfer of funds into the nonprofit school food service account. Food service expenses (\$1,802,117.00) exceeded revenues (\$1,487,175.00) in the amount of -\$314,942.00 based on information reported on the SFAs 2019 Food Service Annual Financial Reports.</p> | <p>Discussed ways to assess food costs and identify ways to reduce food costs and/or labor. Discussed ways to solicit student meal preferences by way of surveys to increase participation and reviewed additional options the SFA could use to generate additional revenues such as adding catering, and/or additional a la carte items. The Institute of Child Nutrition’s (ICN) “Key Performance Indicators (KPIs) for School Nutrition Success” can be found at: https://theicn.org/icn-resources-a-z/kpi. ICN’s “Financial Management Information System” can be found at: https://theicn.org/icn-resources-a-z/financial-management-information-systems/</p> | <p><i>Please provide a description of how the deficit of -\$314,942.00 will be resolved and identify a plan for reducing this deficit in future years. Please also provide supporting documentation which shows that the nonprofit school food service account has been reimbursed for this revenue shortfall.</i></p> |
| <p>8 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, adults were charged \$1.95 for breakfast at both pricing and non-pricing sites, which is below the required \$2.15 for pricing sites and \$2.20 for non-pricing sites as calculated by ADE’s Adult Meal Pricing Tool SY19-20. Additionally, adults were charged \$3.15 for lunch at both pricing and non-pricing sites, which is below the required \$3.60 at pricing sites and \$3.75 at non-pricing sites as calculated by ADE’s Adult Meal Pricing Tool SY19-20.</p> | <p>Discussed ways to determine adult meal prices which included a per meal cost analysis or pricing adult meals to reflect the amount of reimbursement received for a free meal plus the per meal value of entitlement and bonus commodities for non-pricing programs OR the 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. FNS Instruction 782-5 REV. 1, Pricing of Adult Meals in the National School Lunch and School Breakfast Programs, Adult Meal Pricing Tool SY20-21, Step by Step Instruction: How to Determine Adult Meal Prices using the Adult Meal Pricing Tool Located at: http://www.azed.gov/hns/nslp/rm/</p> | <p><i>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 for the 20-21 SY.</i></p> |

9	<p>Compliance with the Revenue from Nonprogram Foods requirements via either the Nonprogram Foods Tool or 5-Day Reference Period as described in FNS Policy Memo SP 20-2016 was not assessed.</p> <p>Discussed revenue from non-program foods requirements and provided the Non-Program Food Revenue Tool. CN 19-12 & attachment (CNR 2010: Guidance on Revenue from Non-Program Foods-Revised and Non-Program Food Revenue Tool), SP 13-2014 (School Food Service Account Revenue from the Sale of Non-Program Foods), SP20-2016 Nonprofit School Food Service Account Nonprogram foods Revenue Requirements, Nonprogram Food Revenue Tool and Step by Step Instruction: How to Complete the Nonprogram Food Revenue Tool can be found at: http://www.azed.gov/hns/nslp/rm/</p>	<p><i>Please complete and submit either the USDA Non-Program Foods Tool or 5-Day Reference Period as evidence of compliance with revenue from nonprogram foods requirements.</i></p>
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General Program Compliance: Civil Rights

10	<p>The USDA nondiscrimination statement used on program materials is not the most current USDA statement. Specifically, the statement on the February monthly breakfast menu for Sequoia Village High School and Sequoia Village School and the February monthly lunch menu for George Washington Academy, Sequoia Village High School and Sequoia Village School was not correct. The Statement read "This institution is an equal opportunity provider and employer".</p> <p>Discussed where to find nondiscrimination statement on ADE's website at http://www.azed.gov/hns/civilrights/ and whether long or short statement would be most appropriate.</p>	<p><i>Please provide an updated monthly breakfast and lunch menu with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i></p>
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General Program Compliance: SFA On-Site Monitoring

11	<p>All required information on the on-site reviews of the breakfast and lunch meal counting and claiming procedures are not being documented on the on-site monitoring forms. Specifically, Question #10 regarding internal controls was not completed.</p> <p>Discussed documentation requirement. The Internal On-Site Monitoring Form of the Meal Counting and Claiming System template can be found on ADE's website at http://www.azed.gov/hns/nslp/forms/ under Additional Forms.</p>	<p><i>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 and all required information will be documented.</i></p>
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General Program Compliance: Local Wellness Policy

Observation: Due to school closures as a result of COVID-19, the triennial assessment of the implementation of the Local Wellness Policy (LWP) will not be conducted by June 30, 2020. The public must be notified of the results of the most recent assessment of the implementation of the LWP.

Per COVID-19: Child Nutrition Response #18, Nationwide Waiver of Local School Wellness Policy Triennial Assessments in the National School Lunch and School Breakfast Programs, issued April 23, 2020, the requirement for Edkey, Inc. - Sequoia Charter School to conduct a triennial assessment of their local wellness policy by June 30, 2020 has been waived. Discussed requirement to complete an assessment. 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.

None required at this time.

Edkey, Inc. - Sequoia Charter School will complete their assessment by June 30, 2021.

General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

No findings.

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

- 12 The written food safety plan did not include adequate Standard Operating Procedures (SOPs) for the following: Handwashing, Glove Use, Non-Food Service Staff & Visitors in Food Service, Using & Calibrating Food Thermometers, Facility & Equipment Maintenance, Approved Food Source, Storing Food, Washing & Handling Fresh Fruits & Vegetables, Thawing, Preventing Cross-Contamination at Food Bars/Self Service, Wiping Cloths, Allergens and Clean Up of Vomit/Fecal Accidents.
- Discussed sample SOPs and guidelines for Critical Control Points (CCPs) found in USDA's Guidance on creating a Food Safety Plan, which can be found on ADE's website at <http://www.azed.gov/hns/nslp/foodsafety/>.
- Please provide a copy of the following SOPs to ensure your food safety plan is complete: Handwashing, Glove Use, Non-Food Service Staff & Visitors in Food Service, Using & Calibrating Food Thermometers, Facility & Equipment Maintenance, Approved Food Source, Storing Food, Washing & Handling Fresh Fruits & Vegetables, Thawing, Preventing Cross-Contamination at Food Bars/Self Service, Wiping Cloths, Allergens and Clean Up of Vomit/Fecal Accidents.*

General Program Compliance: Reporting & Recordkeeping

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| 13 | Several site applications in CNPWeb are incorrect. Specifically, the site application for Sequoia Elementary School indicates students in Grades K-12, but the school only serves students in Grades K-6. Additionally, the site application for Sequoia Secondary School indicates students in Grades K-12, but the school only serves students in Grades 7-12. Lastly, the site application for Sequoia Village High School indicates students are present 4 days per week, but students receive and are claimed for meals 5 days per week. | Discussed steps required to update the site applications in CNPWeb to reflect current practices. | <i>Since the 2019-2020 school year has ended, revised site applications do not need to be submitted. Please provide written assurance that moving forward, all site application in ADE's CNPWeb will accurately reflect current practices.</i> |
| 14 | Production records did not contain all required sections: Name of site. Specifically, one production record is being used for several sites and only one site name appears on the production record. This occurred for three different sets of production records: (1) Arizona Conservatory for Arts and Academics, Arizona Conservatory for Arts and Academics Elementary School and Arizona Conservatory for Arts and Academics Middle School, (2) Children First Leadership Academy, Edkey, Inc. – Precision Learning Center and KELLY and (3) Edkey, Inc. – Sequoia Deaf School, Sequoia Elementary School and Sequoia Secondary School. | 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/mealpatern/ . Production Record for Multiple Grades can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpatern/ . Production Record Template can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpatern/ . | <i>Please provide copies of completed breakfast and lunch production records for 5 consecutive days to demonstrate that all site names appear on production records, as well as written assurance that all records will be maintained for 5 years.</i> |
| 15 | Production records did not contain all required sections: Total number of reimbursable meals served for each distinct grade group. The total meals served for each grade group was missing for the following sites: American Heritage Academy - Camp Verde, American Heritage Academy – Cottonwood, Arizona Conservatory for Arts and Academics, Arizona Conservatory for Arts and Academics Elementary School, Arizona Conservatory for Arts and Academics Middle School, Children First Leadership Academy, Edkey, Inc. – Pathfinder Academy at Eastmark, Edkey, Inc. – Pathfinder Academy – Sequoia Lehi, Edkey, Inc. – Precision Learning Center, Edkey, Inc. – Sequoia Deaf School, KELLY, Pathfinder Academy, Sequoia Elementary School, Sequoia Pathway Academy and Sequoia Secondary School. | 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/mealpatern/ . Production Record for Multiple Grades can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpatern/ . Production Record Template can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpatern/ . | <i>Please provide copies of completed breakfast and lunch production records for 5 consecutive days to demonstrate that the total number of reimbursable meals served for each distinct grade group appears on all production records, as well as written assurance that all records will be maintained for 5 years.</i> |

<p>16 Production records were not completed filled out during the week of review. Specifically, the used serving section was blank for one or more menu items for the following sites: American Heritage Academy – Cottonwood, Arizona Conservatory for Arts and Academics, Arizona Conservatory for Arts and Academics Elementary School, Arizona Conservatory for Arts and Academics Middle School, Children First Leadership Academy, Edkey, Inc. – Pathfinder Academy at Eastmark, Edkey, Inc. – Pathfinder Academy – Sequoia Lehi, Edkey, Inc. – Precision Learning Center, Edkey, Inc. – Sequoia Deaf School, KELLY, Pathfinder Academy, Sequoia Elementary School and Sequoia Secondary School.</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/mealpatern/. Production Record for Multiple Grades can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpatern/. Production Record Template can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpatern/.</p>	<p><i>Please provide copies of completed breakfast and lunch production records for 5 consecutive days to demonstrate that all sections are completed on all production records, as well as written assurance that all records will be maintained for 5 years.</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

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, Edkey, Inc. Sequoia Charter School has completed the Administrative Review for the 2019-2020 school year. Thank you for your cooperation during the review process. It was a pleasure to work with you and your staff.

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	\$0.00
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$0.00

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by September 11, 2020 to Kerrie Zigler at Kerrie.Zigler@azed.gov or 1535 W. Jefferson St., Bin #7, Phoenix, AZ 85007.



8/7/2020

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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