



## Arizona Department of Education Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Round Valley Unified District

CTD: 01-02-10

Site: Round Valley Elementary School

Contacts: Travis Udall, Superintendent; Cass Pond, Business Director; Joseph Stoiber, Food Service Director

Review Date: November 17, 2020 (NSLP, SBP, and ASP) & March 11, 2021 (At-Risk)

Review Period: October 2020 (NSLP, SBP, and ASP) & February 2021 (At-Risk)

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**

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| 1 | <p>Multiple students who were found to be directly certified were not certified for free meal benefits. This contributed towards fiscal action calculations.</p>  | <p>Discussed direct certification procedures and procedures in updating and accurately transferring eligibility status to BID.</p>   | <p><i>Corrective action already received. No further corrective action required.</i></p> |
| 2 | <p>Electronic software is not updating benefit issuance document (BID) correctly with direct certification (DC) match results- multiple students that were determined to be Free or Reduced via income applications were actually DC matches. The electronic system did not update the BID to reflect DC match and date of DC match determination. Multiple students matched in DC at the beginning of the school year, but system did not transfer this eligibility to the BID. Therefore, the SFA received income applications from families later in the year, processed these applications, and students were certified (via income applications) with incorrect eligibility benefits because they should have been established as directly certified for the entirety of the SY. Additionally, there were multiple instances in which families completed income applications at the beginning of the SY (and applications were processed) but students were directly certified at a later date. System did not process that these students were directly certified and benefits were not updated to indicate that students were Free via DC match.</p> | <p>Discussed direct certification procedures and procedures in updating and accurately transferring eligibility status to BID. Discussed contacting software company to problem solve BID errors and determine how to correct these errors. Discussed best practices for ensuring eligibility status is transferred to the BID correctly (such as having someone double check BID on a regular basis).</p> | <p>Corrective action already received. No further corrective action required.</p>        |

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

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No findings.

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**Performance Standard 2: Meal Components & Quantities- Critical Area**

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| <p>3 <b>SBP- Review Period:</b> Quantities observed during the review period did not meet minimum amounts required by the breakfast meal pattern. Specifically, at breakfast on 10/8 a school boy apple was served crediting as 1/2 cup fruit and on 10/15 an orange was served crediting as 1/2 cup fruit when 1 cup fruit needed to meet <u>daily</u> SBP meal pattern requirements. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. Discussed how to credit whole fruits utilizing the Food Buying Guide and resources on the ADE website. Meal pattern requirements for the National School Breakfast Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the How-To Guides tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Corrective action already received. No further corrective action required.</i></p> |
| <p>4 <b>SBP- Review Period:</b> Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, <u>weekly</u> minimum fruit requirements not met during week of menu review- 3.5 cups fruit served when 4 cups fruit needed to meet weekly SBP meal pattern requirement. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations.</p>   | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. Discussed how to credit whole fruits utilizing the Food Buying Guide and resources on the ADE website. Meal pattern requirements for the National School Breakfast Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the How-To Guides tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Corrective action already received. No further corrective action required.</i></p> |

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| 5 | <p><b>SBP- Day of Review:</b> Quantities observed on the day of review did not meet minimum amounts required by the meal pattern. Specifically, at breakfast on 11/17, a banana was served crediting as 1/2 cup fruit when 1 cup fruit needed to meet daily SBP meal pattern requirements. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. Discussed how to credit whole fruits utilizing the Food Buying Guide and resources on the ADE website. Meal pattern requirements for the National School Breakfast Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the How-To Guides tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Corrective action already received. No further corrective action required.</i></p> |
| 6 | <p>During the week of review, all grains served at breakfast and lunch were not whole grain-rich. Specifically, the sandwich bread and homemade dinner roll were not whole grain rich.</p>  | <p>Discussed whole grain-rich requirements. USDA's Whole Grain Resource for the National School Lunch and Breakfast Programs: A Guide to Meeting the Whole Grain-Rich Criteria can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning tab.</p>  | <p><i>Corrective action already received. No further corrective action required.</i></p> |

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**Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area**

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No findings.

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**Meal Access & Reimbursement: Certification & Benefit Issuance**

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| 7 | <p>In multiple instances, the eligibility determined was not transferred correctly to the benefit issuance document (BID). Students who matched in direct certification were categorized within the BID as eligible by case number applications or free via income application. This did not result in fiscal action calculations due to both resulting in free eligibility.</p> | <p>Discussed contacting software company to problem solve BID errors and determine how to correct these errors. Discussed best practices for ensuring eligibility status is transferred to the BID correctly (such as having someone double check BID on a regular basis). The Step by Step Instruction: How to Create a Benefit Issuance Document (BID) can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the How-To Guides tab.</p> | <p><i>Corrective action already received. No further corrective action required.</i></p> |
| 8 | <p>The Sponsor Application in CNPWeb indicated that SFA is using the notification letter provided by ADE when the SFA is using a custom notification letter.</p>   | <p>Discussed steps required to update the Sponsor Application in CNPWeb to reflect current practice of utilizing a custom notification letter.</p>   | <p><i>Corrective action already received. No further corrective action required.</i></p> |

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**Meal Access & Reimbursement: Verification**

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9	Direct verification procedures were not followed correctly. Specifically, direct verification was conducted after contacting families for proof of income.	Discussed direct verification must be conducted prior to contacting families. If the student was directly verified, verification is complete for the household. In this case, do not contact the household to provide income documentation. Referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals tab.	<i>Corrective action already received. No further corrective action required.</i>
10	The verification notice to households did not include a telephone number the household can call at no-cost for assistance.	Discussed the LEA may establish a toll-free number or allow the household to reverse the charges if any household in the LEA are outside of the local calling area. This helps to ensure parents and guardians can contact the LEA during the LEA's operating hours if they work outside the local calling area. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals tab.	<i>Corrective action already received. No further corrective action required.</i>

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**Meal Access & Reimbursement: Meal Counting & Claiming**

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11	Participants approved for Free, Reduced, and Paid meals are not accurately transferred to the monthly claim.	Discussed that participants approved numbers listed on the daily edit check should match what is listed on the monthly claim and that the highest total Free, Reduced, and Paid enrollment throughout any given month should be reported on the claim.	<i>Corrective action already received. No further corrective action required.</i>
12	Daily edit checks are not being conducted.	Discussed how to complete daily edit checks using ADE's Daily Edit Check worksheet. Recommended SFA contact POS vendor to ask which report SFA can run to meet requirements of the daily edit check. The Daily Edit Check Worksheet can be found on ADE's website at on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational tab. The Step by Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the How-To Guides tab.	<i>Corrective action already received. No further corrective action required.</i>

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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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No findings.

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**Meal Pattern & Nutritional Quality: Meal Components & Quantities**

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No findings.

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**Resource Management**

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| 13 | Compliance with the revenue from nonprogram food requirements via either the Nonprogram Food Revenue Tool or 5-Day Reference Period as described in FNS Policy Memo SP 20-2016 was not assessed. | Discussed revenue from nonprogram food requirements and provided with Nonprogram Food Revenue Tool. | <i>Corrective action already received. No further corrective action required.</i> |
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**General Program Compliance: Civil Rights**

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| 14 | The USDA nondiscrimination statement used on Verification Results Letter is not the most current USDA statement.  | Discussed where to find nondiscrimination statement on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> and whether long or short statement would be most appropriate.  | <i>Corrective action already received. No further corrective action required.</i> |
| 15 | The USDA nondiscrimination statement was not printed on appropriate program materials: Unpaid Meal Charge Policy and monthly lunch menu.                                  | Discussed where to find nondiscrimination statement on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> and whether long or short statement would be most appropriate.  | <i>Corrective action already received. No further corrective action required.</i> |
| 16 | Medical statement for students with special dietary accommodations, provided to reviewer, includes "Medical condition requiring accommodation" and the term "disability." | Referred to SP 26-2017: Accommodating Disabilities in the School Meal Programs: Guidance and Questions and Answers (Q&As), question 15, the State agency or SFA may not require that the written medical statement provide a specific diagnosis by name or use the term "disabled" or "disability." Additionally, discussed updating Special Dietary Needs Form to include the language "a physical or mental impairment that restricts the child's diet" as outlined in policy memorandum SP 59-2016: Modifications to Accommodate Disabilities in the School Meal Programs. Suggested SFA utilize the ADE template form on the ADE website. | <i>Corrective action already received. No further corrective action required.</i> |

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**General Program Compliance: SFA On-Site Monitoring**

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No findings.

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**General Program Compliance: Local Wellness Policy**

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| 17 | The public is not being notified of the existence and contents of the Local Wellness Policy (LWP). | Discussed feasible means of notifying the public about the LWP (i.e. posting policy on district website). | <i>None required at this time.</i> |
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18 The review and update of the Local Wellness Policy (LWP), as specified in the policy itself, is not occurring nor is documentation being kept on file to support this. LWP indicates an evaluation of policy will be completed annually, but this is not happening/documentation was not provided to reviewer to show policy is evaluated annually. Discussed why the review and update is not occurring and what can be done to ensure this occurs as specified in the LWP. Discussed maintaining records to document compliance. *None required at this time.*

Observation: Due to the exceptional circumstances of this public health emergency related to COVID-19, the triennial assessment of the implementation of the LWP was not conducted by 11/17/20. 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- requirement for Round Valley UD to conduct a triennial assessment of their local wellness policy by June 30, 2020 was waived. Instead, Round Valley UD is required to conduct their LWP assessment by June 30, 2021. 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. Also discussed feasible means for notifying the public of the results of the most recent assessment. *Not applicable. Round Valley Unified District is required to conduct their assessment by June 30, 2021.*

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**General Program Compliance: Competitive Food Services**

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No findings.

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**General Program Compliance: Professional Standards**

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No findings.

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**General Program Compliance: Water**

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No findings.

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

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| 19 | The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d): Cherry Tomatoes (product of Puerto Rico) and Cucumbers (product of Mexico). 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<br><a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational tab. Buy American Recorded Webinar and FAQ can be found on ADE's website at<br><a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Recorded Webinars (Program Year 2020 and Earlier) tab. | <i>Corrective action already received. No further corrective action required.</i> |
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**General Program Compliance: Reporting & Recordkeeping**

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| 20 | Although advertising literature was provided for Jennie-O turkey ham and credited towards meal pattern, required documentation (CN label or PFS) was not provided to reviewer.   | Discussed when processed products are used in Child Nutrition Programs to meet the meal pattern requirement, the product's contributions must be determined. CN Labels and/or Product Formulation Statements provide valuable crediting information; and only these will be accepted as proper crediting documentation. Guidance on Product Formulation Statements and CN Labels can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning tab. The CN Labels and Product Formulation Statements Recorded Webinar & Webinar Slides can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Recorded Webinars (Program Year 2020 and Earlier). | <i>Corrective action already received. No further corrective action required.</i> |
| 21 | Site Application in CNPWeb indicates that Round Valley Elementary School serves students in grades PreK-4th, but the site does not have/serve PreK students.   | Discussed steps required to update Sponsor/Site Application in CNPWeb to reflect current practices.   | <i>Corrective action already received. No further corrective action required.</i> |
| 22 | Site application in CNPWeb indicated that SFA is operating Offer versus Serve (OVS) for both the SBP and NSLP. After looking through production records, reviewer determined that Round Valley Elementary School is operating the serve-only meal pattern for both the SBP & NSLP. | Discussed steps required to update Sponsor/Site Application in CNPWeb to reflect current practices.   | <i>Corrective action already received. No further corrective action required.</i> |

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| 23 | The entrée substitutions made to the planned breakfast menu on the day of review and during the review period were not documented on the production records.   | Discussed that any changes being made to the planned menu must be documented on production records daily. Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Recorded Webinar (Program Year 2020 and Earlier) tab.  | <i>Corrective action already received. No further corrective action required.</i> |
| 24 | Hamburger Gravy recipe provided did not contain all required sections: HACCP process and HACCP instructions. Additionally, the recipe lists ground beef as an ingredient when the SFA is actually using beef crumbles and water is listed as an ingredient in the preparation instructions but the ingredient and ingredient amount is not recorded. Lastly, the meat/meat alternate meal contribution is incorrect- 2 oz. portion of beef crumbles credits 1.75 M/MA to the meal pattern, not 2 M/MA.                       | Discussed updating recipes to reflect current products being used. Discussed all menu items that contain more than 1 ingredient must have a standardized recipe. Standardized recipes must include the following information: recipe name, recipe number, ingredients and amounts, serving size, recipe yield, preparation instructions, HACCP process, and HACCP instructions. Examples of standardized recipes can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning tab. | <i>Corrective action already received. No further corrective action required.</i> |
| 25 | Mashed Potatoes recipe provided did not contain all required sections: preparation instructions, HACCP process, and HACCP instructions. Additionally, production record serving size and recipe serving size are inconsistent: production record on 10/8 indicates a 1/2 cup serving of mashed potatoes but the recipe indicates the serving size is 1 cup. Lastly, the recipe's vegetable meal contribution is incorrect- a 1 cup serving size of mashed potatoes credits 1 cup vegetable to the meal pattern, not 1/2 cup. | Discussed all menu items that contain more than 1 ingredient must have a standardized recipe. Standardized recipes must include the following information: recipe name, recipe number, ingredients and amounts, serving size, recipe yield, preparation instructions, HACCP process, and HACCP instructions.   | <i>Corrective action already received. No further corrective action required.</i> |
| 26 | Toast recipe provided did not contain all required sections: preparation instructions, HACCP process, and HACCP instructions.  | Discussed all menu items that contain more than 1 ingredient must have a standardized recipe. Standardized recipes must include the following information: recipe name, recipe number, ingredients and amounts, serving size, recipe yield, preparation instructions, HACCP process, and HACCP instructions.   | <i>Corrective action already received. No further corrective action required.</i> |



<p>27 Turkey Ham sandwich recipe provided did not contain all required sections: preparation instructions, HACCP process, &amp; HACCP instructions. Additionally, reviewer determined the following issues with recipe- 1) Recipe yield of 50 sandwiches is incorrect- ingredient amounts listed are for 1 sandwich. 2) Portion size of 4 oz. does not make sense- in this case the SFA will want to record the portion size as a unitized value such as "1 each." 3) Bread ingredient amount listed is incorrect- should be updated to 2 oz. or 2 slices.</p>	<p>Discussed all menu items that contain more than 1 ingredient must have a standardized recipe. Standardized recipes must include the following information: recipe name, recipe number, ingredients and amounts, serving size, recipe yield, preparation instructions, HACCP process, and HACCP instructions. Discussed updates to be made to sandwich recipe.</p>	<p><i>Corrective action already received. No further corrective action required.</i></p>
<p>28 Roll recipe provided does not list out all ingredients and amounts. Recipe indicates enriched all-purpose flour is the only flour used, but after conversation with SFA, reviewer determined that both all-purpose flour &amp; whole wheat flour are used in recipe.</p>	<p>Discussed all menu items that contain more than 1 ingredient must have a standardized recipe. Standardized recipes must include the following information: recipe name, recipe number, ingredients and amounts, serving size, recipe yield, preparation instructions, HACCP process, and HACCP instructions.</p>	<p><i>Corrective action already received. No further corrective action required.</i></p>
<p>29 Beef Stir Fry recipe serving size and production record serving size are inconsistent: production record on 10/6 indicates a 1/2 cup serving of stir fry was served but the recipe indicates the serving size is 3/4 cup. Additionally, the meal contribution crediting listed on recipe is incorrect- 3/4 cup serving credits 1.75 M/MA to the meal pattern, not 2 M/MA.</p>	<p>Discussed all menu items that contain more than 1 ingredient must have a standardized recipe. Standardized recipes must include the following information: recipe name, recipe number, ingredients and amounts, serving size, recipe yield, preparation instructions, HACCP process, and HACCP instructions.</p>	<p><i>Corrective action already received. No further corrective action required.</i></p>

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

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<p>30 Sufficient outreach to families regarding the availability of the School Breakfast Program (SBP) was not conducted at the beginning of or during the school year. Specifically, the serving times, locations where breakfast is available, and SBP costs are not communicated at the beginning of and during the school year.</p>	<p>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. Additionally, discussed SBP reminders must include: serving times, locations where breakfast is available, and SBP costs. Additional information on the SBP can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals tab.</p>	<p><i>Corrective action already received. No further corrective action required.</i></p>
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**Other Federal Program Reviews: Afterschool Snack Program**

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<p>31 Production records do not support that the Afterschool Snack Program (ASP) meal pattern was met on 10/8: a 1 oz. portion of dried fruit was served. A 1 oz. serving of dried fruit credits as 1/4 cup fruit, when 3/4 cup fruit needed to meet meal pattern requirement.</p>	<p>Discussed the meal pattern requirements of the ASP. The ASP meal pattern table can be found on ADE's website at <a href="https://www.azed.gov/hns/afterschool">https://www.azed.gov/hns/afterschool</a> under the Meal Pattern tab.</p>	<p><i>Corrective action already received. No further corrective action required.</i></p>
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32 The 6 oz. portion size of cucumbers recorded on 10/6 production record is inaccurate. Per conversation with SFA, SFA meant to indicate that they were serving 3/4 cup to meet the ASP meal pattern. A 3/4 cup serving of cucumbers = 3.75 oz., not 6 oz.

Discussed how to credit and determine proper serving sizes using the USDA Food Buying Guide. Discussed difference between weight vs. fluid ounces. The Food Buying Guide can be found on the USDA website at <https://foodbuyingguide.fns.usda.gov/>.

*Corrective action already received. No further corrective action required.*

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

Will be reviewed in Summer 2021 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**

No findings.

**Comments/Recommendations:**

Congratulations! Round Valley Unified District has completed the Administrative Review in the 2020-2021 SY. Thank you for all of your hard work and organization throughout the AR process. It was a pleasure working with you, Cass and Joe. Thank you for working so diligently to assure that your students are receiving nutritious meals. I appreciate your enthusiasm and willingness to learn. Please let me know if you have any questions.

**To stay on track with NSLP requirements, check out the NSLP at a Glance Calendar & Monthly Checklist on our website at <https://www.azed.gov/hns/nslp/forms> under the Calendars and Checklists tab.**

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

**Fiscal Action Assessed?**

No- SBP       Yes- SBP      \$520.02  
 No- NSLP       Yes- NSLP      \$0

Fiscal Action under \$600 will be disregarded.



3/23/2021

Reviewer Signature

Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the [School Food Authority Appeal Procedure for the Administrative Review](#) found on the National School Lunch Program Administrative Review tab on the ADE website.

Equity for all students to achieve their full potential  
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