



## Arizona Department of Education Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Ed Ahead  
 CTD: 10-85-06  
 Site: Adventure School, Academy Adventures Midtown

Contacts: John Penczar, Superintendent / Patricia Campbell, Principal

Review Date: January 27, 2021  
 Review Period: December 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
<b>Performance Standard 1: Certification &amp; Benefit Issuance- Critical Area</b>			

No Findings.

<b>Performance Standard 1: Meal Counting &amp; Claiming- Critical Area</b>
--

No Findings.

<b>Performance Standard 2: Meal Components &amp; Quantities- Critical Area</b>
--

No Findings.

<b>Performance Standard 2: Dietary Specifications &amp; Nutrient Analysis- Critical Area</b>
--

No Findings.

<b>Meal Access &amp; Reimbursement: Certification &amp; Benefit Issuance</b>
--

No Findings.

<b>Meal Access &amp; Reimbursement: Verification</b>
--

No Findings.

<b>Meal Access &amp; Reimbursement: Meal Counting &amp; Claiming</b>
--

- |  |  |   |
|--|--|---|
| <p>1 The Academy Adventures Midtown site application in CNPWeb does not accurately reflect the method of NSLP meal service. Specifically, in Section 9 it states that the site is operating Offer versus Serve during lunch instead of Serve Only.</p> | <p>Advised SFA to update site application in CNPWeb and contact their assigned specialist to let them know of the changes.</p> | <p><i>Please submit a new site application in CNPWeb that accurately reflects the method of NSLP meal service. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i></p> |
|--|--|---|

---

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

---

No Findings.

---

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

---

- |   |   |  |  |
|---|---|--|--|
| 2 | Signage which explains what constitutes a reimbursable meal was not displayed to students for breakfast or lunch at Adventure School.   | Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage 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>Please provide the sign that will be displayed to students that demonstrates what constitutes a reimbursable Serve Only meal at breakfast and lunch. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i> |
| 3 | Signage which explains what constitutes a reimbursable Serve Only meal was not displayed to students at Academy Adventures Midtown for breakfast and lunch. Current signage reflects Offer versus Serve requirements. | Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage 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>Please provide the sign that will be displayed to students that demonstrates what constitutes a Serve Only reimbursable meal at breakfast and lunch. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i> |
| 4 | Meal contribution crediting is not accurate for the Egg & Ham Burrito at Adventure School. Specifically, the entrée credits as 2.5 m/ma oz/eq., not 4 m/ma oz/eq.   | Discussed updating recipes to reflect current products being used.   | <i>Please provide an updated recipe for Egg &amp; Ham Burrito.</i>   |

---

**Resource Management**

---

- |   |  |  |   |
|---|--|--|---|
| 5 | Reviewer was unable to select a sample of expenses to review in order to determine whether expenditures made by the SFA during SY19-20 were allowable because the SFA failed to provide a copy of their Nonprofit School Food Service Account's detailed general ledger or equivalent.   | Discussed the requirement that each non-Federal entity must be able to provide records that identify adequately the source and application of funds for Federally-funded activities. These records must contain information pertaining to Federal awards, authorizations, financial obligations, unobligated balances, assets, expenditures, income and interest and be supported by source documentation. [2 CFR 200.302 (b)(3)] Also discussed the importance of having documentation on file to support costs made with Federal funds. In order for costs to be allowable they must be adequately documented [2 CFR 200.403 (g)]. | <i>Please provide written procedures for ensuring that only allowable charges are made to the nonprofit food service account. Please also provide a copy of the detailed general ledger or comparable document for School Year 2019-20 and supporting documentation for one month of expenses for all purchases using nonprofit food service account funds.</i> |
| 6 | SFA's food service program operated at a deficit requiring a transfer of funds into the nonprofit school food service account, and evidence of such a transfer was not provided. Food service expenses (\$82,587) exceeded revenues (\$71,445) in the amount of -\$11,142 based on information reported on the SFAs 2020 Food Service Annual Financial Report. | 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.  | <i>Please provide a description of how the deficit of -\$11,142 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>   |

---

**General Program Compliance: Civil Rights**

---

No Findings.

---

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

---

- |   |  |   |  |
|---|--|---|--|
| 7 | On-site reviews of the lunch meal counting and claiming procedures for all sites within the SFA are not being conducted each year prior to February 1. | Discussed requirement and where to find a template Internal On-Site Monitoring Form-Lunch of the Meal Counting and Claiming System found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational tab. Discussed who would be responsible for completing this each year. | <i>Please provide a completed Internal On-Site Monitoring Form of the Meal Counting and Claiming System. Additionally, please provide a written description of the process that has been put in place to ensure that all sites receive an on-site review of the meal counting and claiming procedures each year prior to February 1.</i> |
|---|--|---|--|

---

**General Program Compliance: Local Wellness Policy**

---

- |    |  |  |                                    |
|----|--|--|------------------------------------|
| 8  | Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the Local Wellness Policy (LWP).              | Discussed feasible means of notifying potential stakeholders of their ability to participate.  | <i>None required at this time.</i> |
| 9  | A recent assessment of the implementation of the Local Wellness Policy (LWP) has not been conducted nor have plans been developed to complete the assessment.                    | Discussed requirement to complete an assessment once every three years, at a minimum. The assessment must measure how the LEA is complying with their LWP, how the LEA's LWP compares to the model wellness policy, and progress made in attaining the goals of the wellness policy. Sample evaluation tools can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals tab. Also discussed feasible means for notifying the public of the results of the most recent assessment available to the public. | <i>None required at this time.</i> |
| 10 | A plan is not in place to notify the public of the results of the most recent assessment of the implementation of the Local Wellness Policy (LWP), when assessment is conducted. | Discussed requirement to make the most recent assessment available to the public. Also discussed feasible means for notifying the public of the results of the most recent assessment on the implementation of the LWP. The USDA's Local Wellness Policy Outreach Toolkit can be found at <a href="https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit/">https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit/</a>  | <i>None required at this time.</i> |

---

**General Program Compliance: Competitive Food Services**

---

No Findings.

---

**General Program Compliance: Professional Standards**

---

- 11 Employees outside of the School Nutrition Program whose responsibilities assist in the operation of the NSLP/SBP have not received applicable training. Specifically, MaryAnn Penczar overseeing Adventure School's food service operation has not met training hour requirements.
- Discussed 4 hour training requirement, employees' job duties and applicable trainings that could be provided and feasible timeline. Trainings for School Nutrition Professionals can be found on ADE's website at <http://www.azed.gov/hns/nslp/training/>. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <https://www.azed.gov/hns/nslp/training> under the Online Courses tab
- Please provide the expected date that the training requirement will be met as well as the name, date and content information of trainings that these employees will receive. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.*

---

**General Program Compliance: Water**

---

No Findings

---

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

---

- 12 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) at off-site storage facilities: Bananas, watermelons, broccoli, tomatoes. Specifically, the caterer has requested Buy American exceptions, however they are not LEA specific nor from the current school year.
- 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 <https://www.azed.gov/hns/nslp/forms> under the Operational tab. Buy American Recorded Webinar and FAQ can be found on ADE's website at <https://www.azed.gov/hns/nslp/training> under the Recorded Webinars
- Please provide a written description of the changes that have been made to procurement and/or recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.*

---

**General Program Compliance: Reporting & Recordkeeping**

---

No Findings.

---

**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 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**

---

Not Applicable.

---

**Comments/Recommendations:**

---

Congratulations! Ed Ahead has completed the Administrative Review in the 2020-2021 SY. I appreciate your hard work and organization throughout the AR process during this unprecedented time. Thank you for working so diligently to assure that your students are receiving nutritious meals. Best wishes for continued success!

**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  
 No- NSLP       Yes- NSLP

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by April 2, 2021 to [Walter.Jacobson@azed.gov](mailto:Walter.Jacobson@azed.gov).



3/5/2021

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  
www.azed.gov – (602) 542-8700 – 1535 West Jefferson Street • Phoenix, Arizona 85007 Bin # 7  
This institution is an equal opportunity provider