



# Arizona Department of Education

## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Phoenix Advantage Charter School, Inc.

CTD: 07-87-14

Site: Phoenix Advantage Charter School

Contacts: Rochelle Elliott, Superintendent; Susan Broderick, Registrar

Review Date: December 16, 2020

Review Period: November 2020

Programs Reviewed:       National School Lunch       School Breakfast       Afterschool Snack  
     Fresh Fruit & Vegetable       Special Milk       At-Risk Afterschool Meals

No.	Review Observations & Findings	Technical Assistance Provided	Required Corrective Action
-----	--------------------------------	-------------------------------	----------------------------

#### Performance Standard 1: Certification & Benefit Issuance- Critical Area

No findings.

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

<b>1</b>	<p>The meal counting system does not comply with USDA requirements. Specifically, caterer staff are completing the daily meal counts at breakfast and lunch instead of SFA staff.</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 with SFA training and resources available for SFA staff to learn how to properly identify and count reimbursable meals, which 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>.</p>	<p><i>Please provide a written description of changes to the system that have been implemented to ensure meal counts will be conducted only by SFA employees at the time of service at breakfast and lunch. Please also provide a certificate of completion of ADE's training, Meal Counting Do's and Don'ts, which can be found on ADE's training website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under Program Year 2021 Live Webinars.</i></p>
----------	---	--	--

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

<b>2</b>	<p>Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically the minimum 1 cup of fruit was not served on any day at breakfast. This was not a repeat finding from cycle two therefore did not contribute toward fiscal action requirements.</p>	<p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). 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. The Using Appropriate Serving Utensils Recorded Webinar &amp; Webinar Slides 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 Recorded Webinars 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>Please provide a written description of the changes that have been made to ensure that daily fruit quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Breakfast Menu must be submitted.</i></p>
----------	---	--	---

- 3 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically the minimum weekly fruit quantity was not served at breakfast. This was not a repeat finding from cycle two therefore did not contribute toward fiscal action requirements.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Breakfast Program can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the How-To Guides tab. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Recorded Webinars tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).
- Please provide a written description of the changes that have been made to ensure that weekly fruit quantities meet minimum amounts required by the meal pattern.*
- 4 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically the daily minimum 3/4 cup of vegetables was not served on two days during the review period. This was determined not to be a repeat finding from cycle two therefore did not contribute toward fiscal action calculations.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the How-To Guides tab. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Recorded Webinars tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).
- Please provide a written description of the changes that have been made to ensure that daily vegetable quantities meet minimum amounts required by the lunch meal pattern. Additionally, the certificate of completion of Step by Step Instruction: How to Plan a Lunch Menu must be submitted.*
- 5 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically the weekly minimum vegetable quantity was not served. This was determined not to be a repeat finding from cycle two therefore did not contribute toward fiscal action calculations.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the How-To Guides tab. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Recorded Webinars tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).
- Please provide a written description of the changes that have been made to ensure that weekly vegetable quantities meet minimum amounts required by the lunch meal pattern.*

- 6 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically the weekly minimum 3/4 cup of the vegetable subgroup red/orange was not served. This was determined not to be a repeat finding from cycle two therefore did not contribute toward fiscal action calculations.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the How-To Guides tab. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Recorded Webinars tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).
- Please provide a written description of the changes that have been made to ensure that weekly vegetable subgroup red/orange quantities will meet minimum amounts required by the lunch meal pattern.*
- 7 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically the weekly minimum 1/2 cup of the vegetable subgroup other was not served. This was determined not to be a repeat finding from cycle two therefore did not contribute toward fiscal action calculations.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the How-To Guides tab. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Recorded Webinars tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).
- Please provide a written description of the changes that have been made to ensure that weekly vegetable subgroup other quantities will meet minimum amounts required by the lunch meal pattern.*
- 8 Quantities observed on the day of review did not meet minimum amounts required by the meal pattern. Specifically the minimum 1 cup of fruit was not served at breakfast. This was not a repeat finding from cycle two therefore did not contribute toward fiscal action requirements.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Breakfast Program can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern tab. The Step by Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the How-To Guides tab. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Recorded Webinars tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).
- Please provide a written description of the changes that have been made to ensure that daily and weekly fruit quantities meet minimum amounts required by the meal pattern.*

- |  |  |  |
|--|--|--|
| <p><b>9</b> Quantities observed on day of review did not meet minimum amounts required by the meal pattern. Specifically the daily minimum 3/4 cup of vegetables was not served at lunch. This was not a repeat finding from cycle two therefore did not contribute toward fiscal action requirements.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch 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 Lunch 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. The Using Appropriate Serving Utensils Recorded Webinar &amp; Webinar Slides 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 Recorded Webinars 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>Please provide a written description of the changes that have been made to ensure that daily vegetable quantities meet minimum amounts required by the lunch meal pattern.</i></p> |
|--|--|--|

---

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

---

No findings.

---

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

---

No findings.

---

**Meal Access & Reimbursement: Verification**

---

No findings.

---

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

---

- |  |   |  |
|--|---|--|
| <p><b>10</b> Daily edit checks are not being conducted.</p>  | <p>Discussed how to complete daily edit checks using ADE's Daily Edit Check worksheet. The Daily Edit Check Worksheet can be found on ADE's website at on ADE's website at <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.</p> | <p><i>Please provide a completed daily edit check worksheet for the month of November 2020 and provide written assurance that daily edit checks will be conducted every month. Additionally, the certificate of completion of Step by Step Instruction: How to Complete Daily Edit Checks must be submitted.</i></p> |
| <p><b>11</b> Point of service staff and substitute point of service staff are not being trained on the meal counting and claiming system (including the backup system) on an annual basis.</p> | <p>Discussed the regulation that SFAs are required to conduct training for point of service staff and serving line staff so they can help students select the required food components/food items in the quantities needed for reimbursable lunches and breakfasts. Annual training is required to meet the professional standards requirements.</p>  | <p><i>Please provide written procedures that demonstrate how point of service staff and substitute point of service staff will be trained on the meal counting and claiming system on an annual basis. Additionally, please provide written assurance that these procedures will be followed.</i></p>                |

---

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

---

No findings.

---

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

---

- |  |  |   |
|--|--|---|
| <b>12</b> Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast or lunch. | Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage can be found on ADE's website at <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 copies the signs that will be displayed to students that demonstrates what constitutes a reimbursable meal at breakfast and lunch. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i> |
|--|--|---|

---

**Resource Management**

---

No findings.

---

**General Program Compliance: Civil Rights**

---

- |  |  |  |
|--|--|--|
| <b>13</b> The USDA nondiscrimination statement was not printed on appropriate program materials, specifically on the notification of benefits letter sent to households at the beginning of the school year. | 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>Please provide an updated notification of benefits letter with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i> |
|--|--|--|

---

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

---

No findings.

---

**General Program Compliance: Local Wellness Policy**

---

No findings.

---

**General Program Compliance: Competitive Food Services**

---

No findings.

---

**General Program Compliance: Professional Standards**

---

- |  |   |  |
|--|---|--|
| <b>14</b> The School Nutrition Program Director did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.    | Discussed 12 hour requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> . The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors 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 Online Courses tab.         | <i>Please provide an updated training tracker for the Director that includes the expected date that the training requirement will be met as well as the name, date and content information of trainings that the School Nutrition Program Director is registered for.</i>        |
| <b>15</b> Full-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 6 hour training requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals 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> . The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors 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 Online Courses tab. | <i>Please provide an updated training tracker for full-time staff that includes the expected date that the training requirement will be met as well as the name, date and content information of trainings that full-time School Nutrition Program staff are registered for.</i> |

---

**General Program Compliance: Water**

---

No findings.

---

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

---

No findings.

---

**General Program Compliance: Reporting & Recordkeeping**

---

- |  |  |  |
|--|--|--|
| <p><b>16</b> The sponsor application in CNPWeb does not accurately reflect the point of service and counting and claiming procedures the SFA is currently operating. Specifically, the sponsor application does not indicate meals are provided via curbside during periods when in-person instruction has transitioned to remote learning as a result of COVID-related campus closures.</p> | <p>Advised SFA to update sponsor application in CNPWeb and contact their assigned specialist to let them know of the changes.</p>  | <p><i>Please submit a new sponsor application in CNPWeb that accurately reflects the point of service and counting and claiming procedures. Additionally, please provide written assurance the sponsor application in CNPWeb will accurately reflect the most current practices in operation moving forward.</i></p> |
| <p><b>17</b> The site application in CNPWeb does not accurately reflect the days of operation. Specifically, the SFA operates Monday-Thursday, however the application states the SFA operates Monday, Tuesday, Thursday and Friday.</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 days of meal service operation. Additionally, please provide written assurance the site application in CNPWeb will accurately reflect the most current practices in operation moving forward.</i></p>                              |
| <p><b>18</b> The site application in CNPWeb does not accurately reflect the type of meal service. Specifically, the SFA is operating serve-only for breakfast and lunch, however the site application indicates OVS.</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 type of meal service operation. Additionally, please provide written assurance the site application in CNPWeb will accurately reflect the most current practices in operation moving forward.</i></p>                              |
| <p><b>19</b> The Multiple Days Meal Distribution Plan was not submitted to ADE prior to distributing meals for multiple days.</p>  | <p>Discussed the non-congregate feeding, meal times and parent/guardian pickup waivers allow for SFAs to provide food items in bulk and to distribute meals for multiple days for pickup or delivery. To distribute meals for multiple days, USDA has instructed ADE to assess the SFA's capacity to execute such an approach effectively. Additionally, discussed ADE has created a Multiple Days Meal Distribution Plan Form for SFAs to provide details on how the distribution plan will be executed. SFAs only need to submit their distribution plan once for SY 20-21. The form must be submitted before the SFA distributes meals for multiple days. ADE will provide technical assistance and request clarification if a distribution plan does not demonstrate the SFA's capacity to provide meals for multiple days. Referred to HNS 33-2020 Procedures for Opting into National School Lunch Program (NSLP) Meal Pattern and Parent/Guardian Pickup Waivers and Providing Meals for Multiple Days in SY 20-21 found on ADE's website at <a href="https://www.azed.gov/hns/nslp/snpcovid/">https://www.azed.gov/hns/nslp/snpcovid/</a>.</p> | <p><i>Please submit the Multiple Days Meal Distribution Plan to ADE. Additionally, provide written assurance that you will provide clarification if your distribution plan does not demonstrate the SFA's capacity to provide meals for multiple days.</i></p>   |

<p><b>20</b> The Parent/Guardian Pickup Waiver Form was not submitted to ADE prior to the SFA implementing parent/guardian pickups.</p>	<p>Discussed ADE has created a Parent/Guardian Pickup Waiver Form for SFAs to provide details on how they will maintain accountability and Program integrity while distributing meals to parents or guardians without children present. SFAs only need to submit the form once for SY 20-21. The electronic form must be submitted before the SFA implements parent/guardian pickups. ADE will provide technical assistance and request clarification if an SFA's submission does not demonstrate that accountability and Program integrity will be maintained while implementing parent/guardian pickups. Referred to HNS 33-2020 Procedures for Opting into National School Lunch Program (NSLP) Meal Pattern and Parent/Guardian Pickup Waivers and Providing Meals for Multiple Days in SY 20-21 found on ADE's website at <a href="https://www.azed.gov/hns/covid19">https://www.azed.gov/hns/covid19</a>.</p>	<p>Please submit the Parent/Guardian Pickup Waiver Form to ADE. Additionally, provide written assurance that you will provide clarification if your submission does not demonstrate that accountability and Program integrity will be maintained while implementing parent/guardian pickups</p>
---	---	---

---

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

---

<p><b>21</b> Households were not notified of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year.</p>	<p>Discussed methods of notifying families of the availability of the SFSP prior to the end of the school year and determined which was most feasible. Summer feeding locations can be found at <a href="https://www.azhealthzone.org/">https://www.azhealthzone.org/</a>.</p>	<p><i>Please provide a description of how households will be notified of the availability of the SFSP prior to the end of the school year and written assurance that this will occur. If you do not plan to operate the SFSP and no other entities reasonably close to your site operate the SFSP, please provide a description of other community resources that will be provided to households prior to the end of the school year.</i></p>
--	--	---

---

**Other Federal Program Reviews: Afterschool Snack Program**

---

No findings.

---

**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 on the completion of the SY2020/2021 Administrative Review! Thank you for your efforts to provide a safe and nutritious meal program to your participants. Please contact your review, Bekah McLeod, at 602-364-1335 or [bekah.mcleod@azed.gov](mailto:bekah.mcleod@azed.gov) with 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  
 No- NSLP       Yes- NSLP

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by February 19, 2021 to Bekah McLeod at [bekah.mcleod@azed.gov](mailto:bekah.mcleod@azed.gov).



1/15/2021

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