Arizona Department of Education
Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Paragon Management, Inc
CTD: 07-89-12
Site: Paradise Honors Elementary School

Contacts: Patrick Schrader, Executive Director & Dawn Merritt, NSLP Director

Review Date: March 31, 2022
Review Period: February 2022

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		
	Not Applicable		
	Performance Standard 1: Meal Counting & Claiming - Critical Area		
	No Findings		
	Performance Standard 2: Meal Components & Quantities - Critical Area		
	No Findings		
	Performance Standard 2: Dietary Specifications & Nutrient Analysis - Critical Area		
	No Findings		
	Meal Access & Reimbursement: Certification & Benefit Issuance		
	Not Applicable		
	Meal Access & Reimbursement: Verification		
	Not Applicable		
	Meal Access & Reimbursement: Meal Counting & Claiming		
1	Meal count sheets for middle school grades weren't completed accurately. The adult and second meals were marked off in the wrong part of the sheet. Reviewer was still able to confirm the meal counts were accurate and that these meals were not counted towards reimbursement.	Discussed how to correctly complete the SFSP daily meal count form and how adult and second meals should be recorded.	*Please provide a written description of the procedures that have been implemented to ensure that the meal count form will be completed accurately and written assurance that adult and second meals will be recorded in the correct part of the sheet.*

| 2 | Daily edit checks are not being conducted appropriately. Specifically, the attendance factor and the total eligibles multiplied by the attendance factor were missing. | Discussed requirements of the daily edit check worksheet and revising the SFAs form or using the ADE's Simplified Daily Edit Check Worksheet, which can be found under https://www.azed.gov/hns/nslp/forms under the Operational tab. | *Please provide a completed daily edit check worksheet for most recent claiming month. Additionally, please provide written assurance that daily edit checks will be conducted accurately.* |

Meal Pattern & Nutritional Quality: Offer Versus Serve

No Findings

Meal Pattern & Nutritional Quality: Meal Components & Quantities

No Findings

Resource Management

| 3 | The Revenue Ratio (proportion of total revenue from the sale of nonprogram foods to the total revenue of the school food service account) was not equal to or greater than the Food Cost Ratio (proportion of total food costs associated with obtaining nonprogram foods to the total costs associated with obtaining program and nonprogram foods from the account). | Discussed revenue from nonprogram food requirements and continuing to use the nonprogram revenue tool to determine compliance when reimbursement rates change and ways to increase revenue from the sale of nonprogram food if needed. | *Please provide a monitoring plan to check compliance with nonprogram food revenue requirements and actions that will be taken if noncompliance persists* |

General Program Compliance: Civil Rights

No Findings

General Program Compliance: SFA On-Site Monitoring

| 4 | On-site reviews of the lunch meal counting and claiming procedures for all sites within the SFA were not conducted prior to February 1. | Discussed requirement and where to find the template Internal On-Site Monitoring Form-Lunch of the Meal Counting and Claiming System found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational tab. | *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.* |

General Program Compliance: Local Wellness Policy

| 5 | The Local Wellness Policy (LWP) did not contain nutrition standards for all foods and beverages provided, but not sold, to students on the school campus during the school day. | Discussed revising the LWP with nutrition standards for all foods and beverages provided, but not sold, to students. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Tab. | *Please provide a written plan for how the missing elements of the LWP will be included. The plan should include draft language of the elements to be added, who will be involved in updating the LWP and the date the update is expected to be completed. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.* |

6	The Local Wellness Policy (LWP) did not contain policies for food and beverage marketing.	Discussed updating the LWP to include policies that allow marketing and advertising of only those foods and beverages that meet Smart Snacks Standards, which applies to exterior of things such as vending machines, posters, menu boards, coolers, trash cans, etc. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Tab.	*None required at this time.*
7	The Local Wellness Policy (LWP) does not specify how and when a review and update of the policy is to occur.	Discussed the best setting and timeframe for the periodic review and update of the LWP as well as how this can be included in the LWP. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Tab.	*None required at this time.*

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

8	Buy American exception forms were on file for non-domestic products, however, the items were not documented when purchased.	In addition to documenting the reason the non-domestic item was purchased, the SFA also needs to document the frequency the item is purchased. Referred to SP38-2017 and ADE's prototype Buy American exception document, which can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational tab.	*Please provide a written description of the changes that have been made to 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 2022 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 completing the Administrative Review! Thank you for your hard work and cooperation during this process. You are all doing a wonderful job implementing the School Nutrition Programs and successfully navigating all of the current challenges. Please keep up the great work!

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
☑ No- SSO SBP   ☐ Yes- SSO SBP
☑ No- SSO NSLP   ☐ Yes- SSO NSLP

Fiscal Action under $600 will be disregarded.

Please submit corrective action response by May 27, 2022 to Lindsey.Cler@azed.gov.

_____   April 27, 2022
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.

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