



Arizona Department of Education Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: New World Educational Center

CTD: 07-87-60

Site(s): New World Educational Center and Pillar Academy Online

Contacts: Jesus Armenta, Superintendent / Cathy Valenzuela, Manager

Review Date: February 9, 2022

Review Period: January 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 Reviewed

Performance Standard 1: Meal Counting & Claiming - Critical Area

1	Meal count totals month of review for breakfast were not correctly combined and recorded. This was deemed a systemic error and contributed 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.	<i>Please provide a written description of changes to the system that have been implemented to ensure that meal service lines provide an accurate count and daily meal count totals are combined accurately for the claim for reimbursement.</i>
2	Documentation for the lunch meal service during the month of review did not support that reimbursable meal counts are accurate. This was deemed a systemic error and contributed towards fiscal action calculations. A full recalculation of lunches served for the months of January and February was conducted.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. Meal counts will now be taken at the end of the meal service line using ADE's daily meal count tally sheet.	<i>Changes to the procedures of meal counting and claiming have been made and a recalculation was conducted. Fiscal action calculations were disregarded. No further corrective action is required at this time.</i>
3	Meal count totals for breakfast on the day of review were not correctly combined and recorded. This was deemed a systemic error and contributed 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.	<i>Please provide a written description of changes to the system that have been implemented to ensure that meal service lines at breakfast provide an accurate count by eligibility category.</i>
4	Lunch service observed on the day of review did not support that reimbursable meal counts are accurate. This was deemed a systemic error and contributed towards fiscal action calculations. A full recalculation of lunches served for the months of January and February was conducted.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. Meal counts will now be taken at the end of the meal service line using ADE's daily meal count tally sheet.	<i>Changes to the procedures of meal counting and claiming have been made and a recalculation was conducted. Fiscal action calculations were disregarded. No further corrective action is required at this time.</i>

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 Reviewed

Meal Access & Reimbursement: Verification

Not Reviewed

Meal Access & Reimbursement: Meal Counting & Claiming

No Findings

Meal Pattern & Nutritional Quality: Offer Versus Serve

- | | | |
|--|---|---|
| 5 Offer Versus Serve was not being properly implemented during the breakfast meal service. Specifically, all required meal components were bagged together so that students were not able to reject any of the components. | Discussed that serve-only meal service style would be better suited for the program operations. Advised SFA to update site application in CNPWeb and contact their assigned specialist to let them know of the changes. | <i>Please submit a new site application in CNPWeb that accurately reflects the meal service style. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i> |
|--|---|---|

Meal Pattern & Nutritional Quality: Meal Components & Quantities

No Findings

Resource Management

No Findings

General Program Compliance: Civil Rights

- 6 The public/media release was not provided to local media, the unemployment office and local employers considering large layoffs. Discussed schools operating SSO must provide public notification regarding the availability of school meals and the eligibility criteria at or near the beginning of the school year. For SY 2021-2022, schools participating in SSO should notify households that meals will be offered free through SSO. Referred to HNS 17-2021 & SP 15-2021 (Q10). Additionally, referred to the template release that can be found on ADE's website at <https://www.azed.gov/hns/nslp/forms> under the Outreach tab. *Please provide written procedures for distributing the public/media release and written assurance that the public/media release will be submitted to the local media, the unemployment office and local employers considering large layoffs prior to the start of each school year.*
- 7 Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, complaints are handled internally by a board member. Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded. The SFA's procedures must note whether an allegation is made verbally or in person. The SFA staff member receiving the allegation must transcribe the complaint. The SFA's procedures for receiving a complaint cannot prevent a complaint from being accepted. Additionally, the SFA's procedures must not indicate that they attempt to resolve the complaint themselves nor can the SFA's complaint process be a prerequisite for accepting a complaint. Additional guidance can be found on ADE's website at <https://www.azed.gov/hns/civilrights>. The Step-by-Step Instruction: How to File a Civil Rights Complaint can be found on ADE's website at <https://www.azed.gov/hns/nslp/training> under the Online Training Library tab. *Please provide a written description of the updated process and procedures for processing complaints alleging discrimination which meets requirements. Additionally, the certificate of completion of Step-by-Step Instruction: How to File a Civil Rights Complaint must be submitted.*

8 Medical statement for students with special dietary accommodations does not contain required sections. Specifically, the form is missing a signature from a licensed professional, doesn't include the food item to avoid/omit or list of substitution(s), nor does it indicate if modification is temporary or permanent.

Discussed required sections of the medical statement for students with special dietary accommodations. Referred to Medical Statement for Students with Special Dietary Accommodations found on ADE's website at <https://www.azed.gov/hns/nslp/forms> under the Operational tab. Step-by-Step Instruction: How to Complete the Medical Statement for Students with Special Dietary Accommodations can be found on ADE's website at <https://www.azed.gov/hns/nslp/training> under the Online Training Library tab.

Please provide a copy of the updated Special Dietary Needs Form that will be used for this purpose. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete the Medical Statement for Students with Special Dietary Accommodations must be submitted.

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

No Findings

General Program Compliance: Water

No Findings

General Program Compliance: Food Safety, Storage and Buy American

- | | | |
|---|--|---|
| <p>9 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: Suncup juices. Additionally, documentation justifying a Buy American exception was not maintained/on file.</p> | <p>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 Online Training Library tab.</p> | <p><i>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.</i></p> |
| <p>10 Documentation was not maintained to support that the schools received two food safety inspections from the local health department each school year, or that the school requested two food safety inspections each year from the local health department.</p> | <p>Discussed that each site operating must obtain two food safety inspections from the local health department per school year or maintain documentation to show that two food safety inspections were requested from the local health department each school year.</p> | <p><i>Please provide written assurance that documentation to show that two food safety inspections were received and/or requested from the local health department each school year will be maintained.</i></p> |

General Program Compliance: Reporting & Recordkeeping

- | | | |
|--|--|---|
| <p>11 Production records for breakfast and lunch did not contain all required sections. Specifically, the leftover and used servings are not being recorded.</p> | <p>Discussed required sections of production records. Production Record Templates can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab. The Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library tab.</p> | <p><i>Please provide copies of completed breakfast and lunch production records for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years. Additionally, the certificate of completion of Production Record Overview must be provided.</i></p> |
| <p>12 Production record crediting is not accurate. Specifically, on 1/3/2022, the strawberry raisins credit 1 oz MMA (sunflower seeds) which was not recorded.</p> | <p>Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Crediting resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab.</p> | <p><i>Please provide updated production records with accurate crediting.</i></p> |

- | | | | |
|----|---|--|---|
| 13 | Production record crediting is not accurate. Specifically, on 1/3/2022, the green chili and cheese quesadilla was recorded as contributing 2.5 oz MMA and 2 oz grain when it actually credits 2.0 oz MMA and 2.25 oz grain. | Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Crediting resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab. | <i>Please provide updated production records with accurate crediting.</i> |
| 14 | Production record crediting is not accurate. Specifically, on 1/5/2022, the cheese pizza contributes 1/8 cup red/orange vegetable which was not recorded. | Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Crediting resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab. | <i>Please provide updated production records with accurate crediting.</i> |

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

- | | | | |
|----|--|--|--|
| 15 | Documentation was not provided supporting that households were not notified of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year. | 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 https://www.azhealthzone.org/ . | <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> |
|----|--|--|--|

Other Federal Program Reviews: Afterschool Snack Program

Not Reviewed

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2022 if applicable.

Other Federal Program Reviews: Fresh Fruit & Vegetable Program

Not Reviewed

Other Federal Program Reviews: Special Milk Program

Not Reviewed

Other Federal Program Reviews: At-Risk Afterschool Meals

Not Reviewed

Comments/Recommendations:

Congratulations - New World Educational Center has completed the Administrative Review of the National School Lunch Program and School Breakfast Program! Thank you for your diligence during the review process and hospitality during the on-site visit. Your hard work to provide your students with healthy meals is commendable!

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.

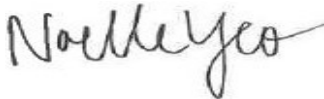
Training: In-person classes, web-based training and How-To guides can be found on ADE's website at <https://www.azed.gov/hns/nslp/training>.

Fiscal Action Assessed?

<input checked="" type="checkbox"/> No- SBP	<input type="checkbox"/> Yes- SBP	\$567.89
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	(\$8,354.49)
<input checked="" type="checkbox"/> No- SSO SBP	<input type="checkbox"/> Yes- SSO SBP	
<input checked="" type="checkbox"/> No- SSO NSLP	<input type="checkbox"/> Yes- SSO NSLP	

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **May 11, 2022** to Noelle Yeo at Noelle.Yeo@azed.gov



4/14/2022

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.

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