Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: The Charter Foundation, Inc.

CTD: 10-87-22

Site: AmeriSchools Academy - Camelback

Contacts: Reginal Barr, CEO and Vicki Ireland, Vice Principal

Review Date: December 13, 2022

Review Period: November 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 and Benefit Issuance – Critical Area		
	No Findings		
	Performance Standard 1: Meal Counting and Claiming – Critical Area		
	No Findings		
	Performance Standard 2: Meal Components & Quantities – Critical Area		
1	The following vegetable subgroup was not offered during the review period: Beans/Peas. This was not determined to be a repeat finding from the previous cycle and did not contributed toward fiscal action calculations.	Discussed vegetable subgroup requirements for the age/grade groups served. Vegetable Subgroup Quick Guide can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. 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 Online Training Library accordion. Please note that repeated violations involving vegetable subgroups may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).	*Please provide one week of lunch production records which demonstrate compliance with the vegetable subgroups. Additionally, please provide written assurance that moving forward, all menus will be planned to meet the vegetable subgroup requirements.*
	Performance Standard 2: Dietary Specifications and Nutrient Analysis – Critical Area		
	No Findings		
	Meal Access & Reimbursement: Certification and Benefit Issuance		

2	Daily edit checks are not being conducted.	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 https://www.azed.gov/hns/nslp/forms under the Operational accordion. The Step-by-Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	*Please provide a completed daily edit check worksheet for the month of November 2022. Additionally, please provide written assurance that daily edit checks will be conducted. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete Daily Edit Checks must be submitted.*

Meal Access & Reimbursement: Verification

No Findings

Meal Access & Reimbursement: Meal Counting and Claiming

No Findings

Meal Pattern & Nutritional Quality: Offer Versus Serve

No Findings

Meal Pattern & Nutritional Quality: Meal Components and Quantities

No Findings

Resource Management

No Findings

Procurement

3	The SFA did not perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold. Specifically, a cost or price analysis was not conducted for the following goods/services: Catering with personnel.	Discussed that a cost or price analysis must be performed for every procurement action in excess of the Simplified Acquisition Threshold, including contract modifications, before receiving bids or proposals. A price analysis will be used to determine the reasonableness of the proposed contract price.	*Please provide a written description of the procurement procedures that will be implemented for conducting the cost or price analysis prior to any formal procurement action. Additionally, please provide written assurance that all records will be maintained for 5 years.*
4	The SFA did not publicly advertise a Request for Proposals for the following goods/services: Catering with personnel.	Discussed that formal procurement methods are required when the value of the procurement for property or services under a Federal financial assistance award exceeds the Simple Acquisition Threshold. Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Referred to 2 CFR 200.320(b)(2)(i).	*Please provide a written description of the procurement procedures that will be implemented for publicizing solicitations for all requests for proposals. Additionally, please provide written assurance that all records will be maintained for 5 years.*

5	The SFA did not maintain records sufficient to detail the significant history of the procurement for formal purchases. Specifically, records detailing the rationale for the method of procurement/selection of contract type/contractor selection or rejection/the basis for the contract price/other were not maintained for the following formal purchases: Catering with personnel.	Discussed that non-Federal entities must maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to, the following: Rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.	*Please provide a written description of procurement procedures that will be implemented to ensure that sufficient records detailing the rationale for the method of procurement/selection of contract type/contractor selection or rejection/the basis for the contract price/other will be maintained for all formal purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.*
6	The SFA did not have procedures for providing sufficient oversight of the procurement to ensure contractors performed in accordance with the terms, conditions, and specifications of their contracts.	Discussed that non-Federal entities must maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to, the following: Rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.	*Please provide a written description of procurement procedures that will be implemented to ensure that sufficient records detailing the rationale for the method of procurement/selection of contract type/contractor selection or rejection/the basis for the contract price/other will be maintained for all formal purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.*

General Program Compliance: Civil Rights

No Findings

General Program Compliance: SFA On-Site Monitoring

No Findings

General Program Compliance: Local Wellness Policy

No Findings

General Program Compliance: Competitive Food Services

7	Foods and beverages sold and served to students in grades K-8 during the school day did not meet Smart Snacks standards. Specifically, candy canes sold during a fundraiser did not meet Smart snacks standards.	Discussed Smart Snacks requirements for grades K-8 and why Candy Canes did not meet standards. The Alliance for a Healthier Generation Smart Snacks Product Calculator can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational accordion. Smart Snacks Summary Chart and additional resources can be found on USDA's website at https://www.fns.usda.gov/school-meals/tools-schools-focusing-smart-snacks. The Online Course: Smart Snacks and Competitive Foods Standards in Arizona can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	*Please provide written procedures for assessing whether a product meets Smart Snacks standards and written assurance that Candy Canes will no longer be served or sold during the school day or that the fundraiser exemption form will be completed prior to selling foods that do not meet the Smart snacks standards.*

General Program Compliance: Professional Standards

No Findings

General Program Compliance: Water

No Findings

General Program Compliance: Food Safety, Storage and Buy American

8	The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) off-site storage facilities: specifically, proper recordkeeping was not maintained regarding Buy American Provision.	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 accordion. 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 accordion.	*Please provide a written description of how you will maintain records properly by using one Buy American form for each item purchased with dates to ensure that the requirements of the Buy American Provision are met.*

General Program Compliance: Reporting and Recordkeeping

9	Production record serving sizes are inaccurate. Specifically, fruits and vegetables are being reported by weight in ounces and not by volume in cups.	Discussed how to report meal component quantities 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 accordion.	*Please provide 1 week of production records that reflects the correct servings for fruits and vegetables. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.*

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

No Findings

Other Federal Program Reviews: Afterschool Snack Program

No Findings

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2023 if applicable.

Other Federal Program Reviews: Fresh Fruit and Vegetable Program

No Findings

Other Federal Program Reviews: Special Milk Program

No Findings

No Findings

Comments/Recommendations:

Congratulations, The Charter Foundation, Inc., has successfully completed the Administrative Review for the 2022-2023 school year. Thank you for your cooperation during the review process. Please remember that we have a variety of trainings (in-person and online) to assist you and your staff in operating a successful National School Lunch Program.

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	$0.00
☑ No- NSLP	☐ Yes- NSLP	$0.00

Fiscal Action under $600 will be disregarded.

Please submit corrective action response by February 10, 2023 to Megan Lynch, RD at Megan.Lynch@azed.gov.

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 under the Reviews Conducted by the State Agency accordion on ADE's National School Lunch and School Breakfast Program webpage.

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