



## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Portable Practical Educational Preparation, Inc. (PPEP, Inc.)

CTD: 10-87-44

Site(s): PPEP TEC - Celestino Fernandez Learning Center and PPEP TEC - Colin L. Powell Learning Center

Contacts: Wayne Tucker, Superintendent and Anabel Robles, District NSLP Coordinator

Review Date: October 25th – 26th, 2022

Review Period: September 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
<b>Performance Standard 1: Certification and Benefit Issuance – Critical Area</b>			
No Findings.			

#### Performance Standard 1: Meal Counting and Claiming – Critical Area

1	The following vegetable subgroups were not offered during the review period: Red/Orange and Other. Specifically, during lunch at PPEP TEC - CPLC during the review period insufficient quantities of Red/Orange or Other vegetables were served. This was determined to be a repeat finding from the previous cycle and 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning accordion. 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 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).	<i>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. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.</i>
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#### Performance Standard 2: Meal Components & Quantities – Critical Area

No Findings.

#### Performance Standard 2: Dietary Specifications and Nutrient Analysis – Critical Area

No Findings.

#### Meal Access & Reimbursement: Certification and Benefit Issuance

No Findings.

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**Meal Access & Reimbursement: Verification**

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No Findings.

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

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No Findings.

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

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| 2 Offer versus Serve (OVS) was not implemented properly. Specifically, at PPEP TEC - CPLC students were not given the option to decline component the milk component. | Provided technical assistance on proper implementation of OVS and discussed with kitchen and point of service staff. Reviewed menu and discussed options for a reimbursable meal under OVS. USDA's Offer Versus Serve Manual, Effective beginning School Year 2015-2016 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 accordion. | <i>Please provide a written description demonstrating how OVS will be implemented properly. Additionally, please provide written assurance that moving forward, OVS will be implemented properly.</i> |
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**Meal Pattern & Nutritional Quality: Meal Components and Quantities**

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No Findings.

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**Resource Management**

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| 3 An approved indirect cost rate from the Arizona Department of Education was not obtained by the SFA prior to charging indirect costs to the nonprofit school food service account in School Year 2021-2022. | Discussed that an LEA must have an approved indirect cost rate issued by the State agency that covers the period of time indirect costs were charged. Referred to USDA's Indirect Cost Guidance located at <a href="https://www.fns.usda.gov/cn/indirect-cost-guidance">https://www.fns.usda.gov/cn/indirect-cost-guidance</a> .  | <i>Please provide written procedures for the process that will be implemented to submit an indirect cost rate proposal and obtain an approved indirect cost rate prior to charging indirect costs to the nonprofit school food service account.</i>   |
| 4 Indirect costs were incorrectly calculated. Specifically, documentation for indirect costs were not provided to verify if indirect costs were correctly calculated.   | Discussed proper classification of direct/indirect costs. Reviewed requirements that indirect costs be charged consistently across the SFA as required in 2 CFR 200.412-414. Referred to the USDA's Indirect Cost Guidance Manual located at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals accordion, which can be used as a resource when determining allowable indirect costs. | <i>Please provide the calculation or tool that will be used to determine the amount of indirect costs charged to the nonprofit school food service account. Additionally, please provide a written plan detailing the steps that will be taken to ensure indirect costs are calculated accurately. If required please also provide supporting documentation which reflects that any indirect costs charged in excess of the allowable rate have been returned to the nonprofit school food service account.</i> |

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**Procurement**

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No Findings.

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**General Program Compliance: Civil Rights**

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| 5 | The USDA nondiscrimination statement used on program materials is not the most current USDA statement. | 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 program material with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i> |
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**General Program Compliance: SFA On-Site Monitoring**

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No Findings.

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**General Program Compliance: Local Wellness Policy**

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No Findings.

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**General Program Compliance: Competitive Food Services**

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No Findings.

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**General Program Compliance: Professional Standards**

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No Findings.

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**General Program Compliance: Water**

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No Findings.

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

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No Findings.

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**General Program Compliance: Reporting and Recordkeeping**

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| 6 | Production records for Breakfast on day of review did not contain all required sections: menu item. Specifically, the Breakfast production records at PPEP TEC - CFLC did not accurately reflect what is being served; all entree serving options were not listed on production record. | Discussed required sections of production records. Production Record Templates 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 accordion. The Production Record Overview Recorded Webinar & Webinar Slides 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 Training Library accordion. | <i>Please provide copies of completed Breakfast 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> |
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7	Production records for Lunch on day of review did not contain all required sections: menu item. Specifically, the Lunch production records at PPEP TEC - CPLC did not accurately reflect what is being served; corn, apple or pear servings were not listed on production records.	Discussed required sections of production records. Production Record Templates 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 accordion. The Production Record Overview Recorded Webinar & Webinar Slides 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 Training Library accordion.	<i>Please provide copies of completed 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>
8	Production record crediting is inaccurate. Specifically, Baked chips served at PPEP TEC - CPLC during Lunch on 9/14/22 and 10/26/22 credited as 1/8 cup Vegetable; however, no supporting documentation provided to confirm.	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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning accordion.	<i>Please provide a production record that reflects the correct crediting information for Baked Chips. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i>
9	Production record crediting is inaccurate. Specifically, Beans and cheese burrito served at PPEP TEC - CPLC during Lunch on 9/12/22 credited as 2.0 oz eq Grain; however, the production record indicated it contained 1.0 oz eq 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning accordion.	<i>Please provide a production record that reflects the correct crediting information for Beans and cheese burrito. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i>
10	Production record crediting is inaccurate. Specifically, Chili dogs served at PPEP TEC - CPLC during Lunch on 9/12/22 and 10/26/22 credited as 2.0 oz eq Grain; however, the production record indicated it contained 1.0 oz eq 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning accordion.	<i>Please provide a production record that reflects the correct crediting information for Chili dogs. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i>
11	Production record crediting is inaccurate. Specifically, Hot Dogs served at PPEP TEC - CPLC during Lunch on 10/26/22 credited as 2.0 oz eq Grain; however, the production record indicated it contained 1.0 oz eq 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning accordion.	<i>Please provide a production record that reflects the correct crediting information for Hot Dogs. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i>

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

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No Findings.

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#### Other Federal Program Reviews: Afterschool Snack Program

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Not Participating.

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#### Other Federal Program Reviews: Seamless Summer Option

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Will be reviewed in Summer 2023 if applicable.

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**Other Federal Program Reviews: Fresh Fruit and Vegetable Program**

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Not Participating.

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**Other Federal Program Reviews: Special Milk Program**

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Not Participating.

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**Other Federal Program Reviews: At-Risk Afterschool Meals**

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Not Participating.

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**Comments/Recommendations:**

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Congratulations! Portable Practical Educational Preparation, Inc. (PPEP, Inc.) has completed the administrative review for the 2022-2023 school year. Thank you for your hospitality, organization, and sense of urgency during the review process. Your team works together in order to implement the School Nutrition Programs. It is evident that you are working hard to ensure your students are fed healthy, delicious meals in a supportive environment.

**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	\$0
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$551.25

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by March 10, 2023 to Joyce Benally at [Joyce.Benally@azed.gov](mailto:Joyce.Benally@azed.gov).

**Joyce Benally** Digitally signed by Joyce Benally  
Date: 2023.02.07 08:15:53  
-07'00'

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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