



## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Prescott Valley Charter School

CTD: 07-85-16

Site(s): Prescott Valley School

Contacts: Monika Fuller, Director ; Shannon Dieu, Food Services Director

Review Date: January 26, 2023

Review Period: December 2023

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 |
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#### 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

No Findings

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

No Findings

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

No Findings

#### Meal Access & Reimbursement: Verification

No Findings

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

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| 1 | Daily edit checks are not being conducted appropriately. Specifically, the attendance factor on the daily edit check does not match the attendance factor on the monthly reimbursement claims. | 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<br><a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational accordion. The Step-by-Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at<br><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 a completed daily edit check worksheet for the month of February. 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.</i> |
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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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No Findings

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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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| 2 Meals served to teachers, administrators, custodians, and other adults were not priced so that the adult payment was sufficient to cover the overall cost of the meal. | Discussed ways to determine adult meal prices which included a per meal cost analysis and pricing utilizing the Adult Meal Pricing Tool. Non-Pricing Sites: pricing adult meals to reflect the amount of reimbursement received for a free meal plus the per meal value of entitlement and bonus commodities for non-pricing programs. Pricing Site: the paid meal price plus the amount of reimbursement received for a paid meal plus the per meal value of entitlement and bonus commodities for pricing programs. Referred to Adult Meal Pricing Tool SY 22-23 on ADE's website at <a href="https://www.azed.gov/hns/nsfp/forms/">https://www.azed.gov/hns/nsfp/forms/</a> under the Financial accordon. | Please provide a written description of the steps which have been taken to increase adult meal prices and resolve the discrepancy, including the exact formula used to price adult meals. Additionally, please submit supporting documentation which reflects that prices have been increased to the appropriate level. |
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**Procurement**

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| 3 Small purchase procedures were not in compliance with procurement requirements. Specifically, price or rate quotations were not obtained from an adequate number of qualified sources for the following small purchases: Cafeteria dining tables from Worthington Direct - Qty 12              | Discussed that if small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources as determined appropriate by the non-Federal entity.  | Please provide a written description of procurement procedures that will be followed prior to making a small purchase including the title of the individual within the SFA responsible for obtaining quotes for small purchases.  |
| 4 The SFA did not maintain records sufficient to detail the significant history of the procurement for small purchases. Specifically, insufficient evaluation and award documentation was maintained for the following small purchases: Cafeteria dining tables from Worthington Direct - Qty 12 | 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:<br>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 of the evaluation and award will be maintained for all small purchases. Additionally, please provide written assurance that all records will be maintained for 5 years. |

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**General Program Compliance: Civil Rights**

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| 5 The USDA nondiscrimination statement was not printed on appropriate program materials. Specifically, Summer Food Service Program outreach material. | 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. | 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. |
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| 6 | Medical statement for students with special dietary accommodations includes "Diagnosis requiring diet modification."   | Referred to SP 26-2017: Accommodating Disabilities in the School Meal Programs: Guidance and Questions and Answers (Q&As), question 15, the State agency or SFA may not require that the written medical statement provide a specific diagnosis by name or use the term "disabled" or "disability." Additionally, discussed updating Special Dietary Needs Form to include the language "a physical or mental impairment that restricts the child's diet" as outlined in policy memorandum SP 59-2016: Modifications to Accommodate Disabilities in the School Meal Programs. | <i>Please provide a copy of the updated Special Dietary Needs Form that includes the language: "a physical or mental impairment that restricts the child's diet."</i>   |
| 7 | The "And Justice for All" poster was not displayed in a prominent location during Grab and Go breakfast service and was not visible to all program participants. | Discussed requirements of where poster must be placed and where to find a printable "And Justice For All" poster on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> . Referred to HNS 08-2019 USDA Nondiscrimination And Justice for All Poster Clarification.   | <i>Please provide pictures to demonstrate the posters are now displayed in a prominent location and visible to all program participants. Additionally, please provide written assurance that the "And Justice For All" poster has been displayed in a prominent location and visible to all program participants.</i> |

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

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Not Applicable

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**General Program Compliance: Local Wellness Policy**

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| 8 | The Local Wellness Policy (LWP) did not contain all required elements. Specifically, the 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 during the school day. Explained that this requirement applies to exterior vending machines, posters, menu boards, coolers, trash cans and cups used for beverage dispensing. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at <a href="https://www.azed.gov/hns/nsfp/training">https://www.azed.gov/hns/nsfp/training</a> under the Online Training accordion. | <i>Please provide a written plan for how n policies for food and beverage marketing will be added to the LWP. The plan should include draft language of the element 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 LWP will be specific to your institution.</i> |
| 9 | The review and update of the Local Wellness Policy (LWP), as specified in the policy itself, is not occurring nor is documentation being kept on file to support this. | Discussed why the review and update is not occurring and what can be done to ensure this occurs as specified in the LWP. Discussed maintaining records to document compliance. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at <a href="https://www.azed.gov/hns/nsfp/training">https://www.azed.gov/hns/nsfp/training</a> under the Online Training accordion.   | <i>Please provide a written description of how the LWP will be reviewed and updated as well as how reviews and updates will be documented.</i>  |

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| <p>10 The recent assessment of the implementation of the Local Wellness Policy (LWP) did not meet the Final Rule requirements. Specifically, the assessment did not measure how the LEA's LWP compares to a model wellness policy.</p> | <p>Discussed requirement to complete an assessment once every three years, at a minimum. The assessment must measure how the LEA is complying with their LWP, how the LEA's LWP compares to the model wellness policy, and progress made in attaining the goals of the wellness policy. Sample evaluation tools 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 Local Wellness Policy accordion. Local Wellness Policy Assessment: Making it Meaningful Webinar 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 accordion.</p> | <p><i>Please provide a written plan for conducting an assessment of the implementation of the LWP. This plan must include who will be designated as the oversight official, who will be invited to participate in the assessment process, and the date by which the assessment is expected to be completed.</i></p> |
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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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| <p>11 Records documenting electronic school meal applications for eligible students are not kept on file for the minimum required 5 years.</p> | <p>Discussed record keeping requirements and timeframe of 5 years.</p> | <p><i>Please provide written assurance that all documents pertaining to the school meal programs will be retained on file for at least 5 years, as is required by Arizona law, as well as a written plan for ensuring that this requirement is met.</i></p> |
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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 Applicable

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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 Applicable

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

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Not Applicable

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

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No Findings

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**Comments/Recommendations:**

Thank you for your cooperation during the NSLP Administrative Review. Congratulations on maintaining a well administered program that supports safe and healthy meals to the students of Prescott Valley School. Keep up the good 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

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by March 20, 2023 to [Brandon.Estrada@azed.gov](mailto:Brandon.Estrada@azed.gov).

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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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