



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: St. Michael Indian School

CTD: 01-20-03

Site: St. Michaels School

Contacts: Dorothea Teso - President

Melissa Kee - Food Service Director

Dee Weber - Nutritionist Specialist

Review Date: May 18, 2023

Review Period: April 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

No Findings.

Meal Pattern & Nutritional Quality: Offer Versus Serve

No Findings.

Meal Pattern & Nutritional Quality: Meal Components and Quantities

No Findings.

Resource Management

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| <p>1 Compliance with the revenue from nonprogram food requirements via either the Nonprogram Food Revenue Tool or 5-Day Reference Period as described in FNS Policy Memo SP 20-2016 was not assessed.</p> | <p>Discussed revenue from nonprogram food requirements and provided with Nonprogram Food Revenue Tool. Referred to FNS Instruction 782-5 REV. 1 for more information about pricing for nonprogram adult meals.</p> | <p><i>Please complete and submit either the USDA Nonprogram Food Revenue Tool or 5-Day Reference Period as evidence of compliance with revenue from nonprogram food requirements.</i></p> |
| <p>2 A system or process to sufficiently separate nonprogram food revenue from program food revenue has not been implemented. Specifically, adult meals and smart snacks.</p> | <p>Discussed feasible methods for separating revenues. Discussed revenue from non-program foods requirements and provided with Nonprogram Food Revenue Tool. Referred to FNS Instruction 782-5 REV. 1 for more information about pricing for nonprogram adult meals.</p> | <p><i>Please provide a description of the systems that will be developed to separate nonprogram food revenue from program food revenue and assurance that those systems will be implemented.</i></p> |
| <p>3 Meals served to teachers, administrators, custodians, and other adults were not priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or payroll funds, or funding from voluntary agencies) was sufficient to cover the overall cost of the meal.</p> | <p>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 https://www.azed.gov/hns/nsfp/forms/ under the Financial accordion.</p> | <p><i>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.</i></p> |
| <p>4 A system or process to sufficiently separate nonprogram food costs from program food costs has not been implemented. Specifically, adult meals and smart snacks.</p> | <p>Discussed feasible methods for separating costs. Discussed revenue from nonprogram foods requirements and provided with Nonprogram Food Revenue Tool. Referred to FNS Instruction 782-5 REV. 1 for more information about pricing for nonprogram adult meals.</p> | <p><i>Please provide a description of the systems that will be developed to separate nonprogram food costs from program food costs and assurance that those systems will be implemented.</i></p> |

5 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 provided with Nonprogram Food Revenue Tool. Referred to FNS Instruction 782-5 REV. 1 for more information about pricing for nonprogram adult meals. Discussed best practices for pricing nonprogram foods and ways to increase revenue from the sale of nonprogram food.	<i>Please indicate how it will ensure that the Revenue Ratio will be equal to or greater than the Food Cost Ratio. The explanation could include raising nonprogram food prices and adult meal prices to sufficiently cover the cost of obtaining nonprogram foods. Alternatively, the SFA could provide non-Federal funds in the amount of the revenue shortfall to the nonprofit school food service account.</i>
6 All revenue from nonprogram foods did not accrue to the nonprofit school foodservice account. Specifically, smart snacks.	Discussed requirement that all revenue from the sale of nonprogram foods must return to the non-profit school foodservice account if nonprogram foods were purchased through the non-profit school foodservice account as specified in 7 CFR 210.14(f). Reviewed current procedures for depositing revenue from the sale of nonprogram foods to the nonprofit school foodservice account and suggested changes. Explained that the revenue from the sale of the nonprogram foods must be returned to the non-profit school foodservice account for fiscal year 20XX.	<i>Please provide a written description of the procedures that will be implemented to ensure that all revenue from the sale of nonprogram foods will accrue to the nonprofit school food service account. Additionally, please provide documentation which reflects that any revenue that did not previously accrue to the nonprofit school food service account for nonprogram foods [include dollar amount] has been reimbursed to this account.</i>
7 Documentation was not provided to support the usage of Supply Chain Assistance funds.	Discussed that the attestation statement signed by the SFA detailed that the SFA will use Supply Chain Assistance (SCA) funds only for purchasing unprocessed or minimally processed domestic food products and that SFAs are required to maintain purchasing and other related records for review and audit purposes. Referred to SP 03-2022: Allocation of Supply Chain Assistance (SCA) Funds to Alleviate Supply Chain Disruptions in the School Meal Programs located on ADE's website at https://www.azed.gov/hns/memos .	<i>Please provide documentation demonstrating how the \$30,499.14 of Supply Chain Assistance funds were spent.</i>

Procurement

8 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: Food.	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.	<i>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.</i>
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9	Small purchase procedures were not in compliance with procurement requirements. Specifically, insufficient documentation was provided to support that price or rate quotations were obtained from an adequate number of qualified sources for the following small purchases: Food.	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.	<i>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. Additionally, please provide written assurance that all records will be maintained for 5 years.</i>
10	Small purchase procedures were not in compliance with procurement requirements. Specifically, no solicitation documentation was provided for the following small purchases: Food.	Discussed that all procurement transactions for the acquisition of property or services required under a Federal award must be conducted in a manner providing full and open competition consistent with the standards of this 2 CFR 200.319 and 2 CFR 200.320. Additionally discussed that non-Federal entities must have written procedures for procurement transactions. These procedures must ensure that all solicitations incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured.	<i>Please provide a written description of solicitation procedures that will be followed prior to making a small purchase including the title of the individual within the SFA responsible for conducting the solicitation for all small purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.</i>
11	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: Food.	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.	<i>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.</i>
12	The SFA did not evaluate and award the bids/offers accurately for the following small purchases: Food.	Discussed that, when making small purchases, an evaluation of responsive and responsible vendors must be conducted using evaluation criteria where award is based on the lowest responsive, responsible quote.	<i>Please provide a written description of evaluation and award procedures that will be implemented to ensure that small purchases are awarded to the lowest responsive and responsible quote. Additionally, please provide written assurance that all records will be maintained for 5 years.</i>

General Program Compliance: Civil Rights

13	The most recent "And Justice for All" poster was not displayed in a prominent location and was not visible to all program participants. Specifically, the poster posted in the cafeteria is from 2015.	Discussed requirements of displaying the most recent poster and where to find a printable "And Justice For All" poster on ADE's website at https://www.azed.gov/hns/civilrights . 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

Not Applicable.

General Program Compliance: Local Wellness Policy

No Findings.

General Program Compliance: Competitive Food Services

No Findings.

General Program Compliance: Professional Standards

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| 14 | The School Nutrition Program Director did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed. | Discussed 12 hour requirement and feasibility for attending upcoming applicable trainings. Training Curriculum for Arizona Child Nutrition Professionals Operating the National School Lunch and School Breakfast Program can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Build Your Employees Training Plans accordion. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion. | <i>Please provide the expected date that the training requirement will be met as well as the name, date and content information of trainings that the School Nutrition Program Director is registered for. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i> |
| 15 | Full-time School Nutrition Program staff have not met the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed. | Discussed 6 hour training requirement and feasibility for attending upcoming applicable trainings. Training Curriculum for Arizona Child Nutrition Professionals Operating the National School Lunch and School Breakfast Program can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Build Your Employees Training Plans accordion. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion. | <i>Please provide the expected date that the training requirement will be met as well as the name, date and content information of trainings that full-time School Nutrition Program staff are registered for. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i> |

16	Part-time School Nutrition Program staff have not met the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.	Discussed 4 hour training requirement and feasibility for attending upcoming applicable trainings. Training Curriculum for Arizona Child Nutrition Professionals Operating the National School Lunch and School Breakfast Program can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Build Your Employees Training Plans accordion. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Please provide the expected date that the training requirement will be met as well as the name, date and content information of trainings that Part-time School Nutrition Program staff are registered for.</i>
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General Program Compliance: Water

No Findings.

General Program Compliance: Food Safety, Storage and Buy American

17	The most recent food safety inspection report was not posted in a prominent location and was not visible to all program participants.	Discussed making copies of most recent report and feasible places for posting.	<i>Please provide a photo demonstrating that the most recent food safety inspection report has been posted in a location where the program participants can view it. Additionally, please specify where the report has been posted.</i>
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General Program Compliance: Reporting and Recordkeeping

18	Sufficient documentation to support compliance with revenue from nonprogram foods requirements has not been maintained.	Discussed requirements for nonprogram food revenue and shared the Nonprogram Food Revenue Tool.	<i>Please provide written assurance that the Nonprogram Food Revenue Tool or other appropriate calculation documentation to support compliance with revenue from nonprogram foods requirements will be maintained.</i>
19	The requested documentation for Resource Management and Procurement was not submitted to ADE on time.	Discussed reporting requirements for Resource Management and Procurement and who would be responsible for submitting.	<i>Please provide written assurance that the Resource Management and Procurement will be submitted on time to ADE as is required by the designated due date, as well as the steps that will be taken to ensure this requirement is adhered to.</i>

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

20	Although monthly menus are posted on district website and copies are available on-site, sufficient outreach to families regarding the availability of the School Breakfast Program (SBP) was not conducted at the beginning of or during the school year. Specifically, the serving times, locations where breakfast is available, and SBP costs are not communicated to families.	Discussed methods of notifying families of the availability of the SBP at the start of and throughout the school year and determined. Additionally, discussed SBP reminders must include: serving times, locations where breakfast is available, and SBP costs.	<i>Please provide documentation that demonstrates how households are notified of the availability of the SBP at the beginning of and during the school year. Additionally, please provide a written description of how households will be notified of the availability of the SBP at the beginning of and during the school year, and written assurance that this will occur.</i>
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Other Federal Program Reviews: Afterschool Snack Program

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| 21 The Afterschool Snack Program (ASP) monitoring review was not conducted within the first four weeks of operation and one additional time during the school year. | Discussed ASP monitoring requirements. A sample ASP monitoring form can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational accordon. | <i>Please provide written assurance that the ASP will be monitored once within the first four weeks of operation and one additional time during the school year, and that documentation to support this will be maintained.</i> |
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Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2023 if applicable.

Other Federal Program Reviews: Fresh Fruit and 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:

St. Michael Indian School, thank you for the warm welcome. Continue serving your students great and healthy meals. As time moves forward, begin working on procurement and resource management early in the school year so that you will always be equipped for what's to come next.

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	\$0.00
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$0.00

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **July 14, 2023** to Danielle Kirksey at Danielle.Kirksey@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.

Tom Horne, Superintendent of Public Instruction
1535 West Jefferson Street • Phoenix Arizona 85007 • www.azed.gov
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This institution is an equal opportunity provider.