



Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Milestones Charter School

CTD: 07-87-91

Sites: AAEC - SMCC Campus, Bennett Academy, Bennett Academy - Venture Site, Career Success School - Sage Campus, Milestones Charter School, Pioneer Technology & Arts Academy of Arizona, Pleasantview Christian Elementary

Contacts: Tara Cabardo, Administrator and Sharie Banbury, Food Service Director

Review Date: December 7, 12-15 and 19-20, 2022 & May 15, 2023 (At-Risk)

Review Period: November 2022 & April (At-Risk)

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			

1	Multiple applications were certified incorrectly or utilized incomplete information. This contributed toward fiscal action calculations.	Discussed errors found and required corrective action. Referred to Processing Applications, Reviewing Applications Based on Income, Assessing Completeness of Categorically Eligible Applications, Determining Eligibility for Categorically Eligible Applications section(s) in USDA's Eligibility Manual for School Meals found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals tab. Required - OR- Suggested completing the training: Step-by-Step Instruction: How to Process Household Applications found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library tab.	<i>Corrections have been made to certification errors. Please describe the process that will be implemented to reduce the amount of errors that occur while determining the eligibility status for each student. Additionally, the certificate of completion of Step-by-Step Instruction: How to Process Household Applications must be submitted.</i>
---	--	--	--

Performance Standard 1: Meal Counting and Claiming – Critical Area

2	Pioneer Technology & Arts Academy of Arizona: Breakfast and lunch meal counts observed on the day of review and 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 breakfasts and lunches served for the months of August - February will be conducted.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue.	<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.</i>
---	---	---	---

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

- | | | | |
|---|---|--|---|
| 3 | Verification procedures were not followed correctly. Specifically, the income documentation provided did not support the income application; however, the eligibility status was not changed. | Discussed proper verification procedures and how to verify the income. Referred to Online Training: Verification Review ADE's website at https://www.azed.gov/hns/nslp/training under the Online Courses tab. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals tab. | <i>Please provide written procedures that will be followed when verifying a household's income documentation.</i> |
| 4 | Verification procedures were not followed correctly. Specifically, one selected application was documented as responded, original determination changed to paid; however, should have been documented as did not respond, original determination changed to paid. | Discussed proper verification procedures and referred to Verification Tracking Form and Online Training: Verification Review found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Courses tab. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals tab. | <i>Please provide a written description of changes to the system that have been implemented to ensure that verification will be conducted according to the required procedure.</i> |
| 5 | Households selected for verification were not notified adequately. Specifically, the reviewer was unable to determine compliance due to notification letters not being retained on file. | Discussed requirements for notifying households selected for verification and potential timelines. Referred to Notification of Verification Letter and Online Training: Verification Review found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Courses tab. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals tab. | <i>Please provide a copy of the notification letter. Additionally, provide written assurance that households selected for verification will have notification letters retained on file.</i> |

- | | | |
|---|---|---|
| <p>6 Households that failed to respond to verification were not given adequate follow-up. Specifically, the reviewer was unable to determine compliance due to notification letters not being retained on file.</p> | <p>Discussed options for conducting follow-up for households that failed to respond to verification and potential timelines. Referred to Verification Tracking Form found at https://www.azed.gov/hns/nsfp/forms under the Calendars and Checklists tab. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at https://www.azed.gov/hns/nsfp under the Guidance Manuals tab.</p> | <p><i>Please provide written procedures for following up with households that fail to respond to verification will be conducted.</i></p> |
| <p>7 The notice of adverse action did not meet requirements. Specifically, it did not allow 10 calendar days to file an appeal.</p> | <p>Discussed an appeal must be filed within the 10 calendar days advance notice period to ensure continued benefits while awaiting a hearing and decision. Additionally, discussed requirements for notifying households of adverse action, including timelines and dates to be included on the notice. Referred to Letter of Verification Results and Online Training: Verification Review found at https://www.azed.gov/hns/nsfp/training under the Online Courses tab. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at https://www.azed.gov/hns/nsfp under the Guidance Manuals tab.</p> | <p><i>Please provide written assurance that an adequate notice of adverse action will be provided to households that will have a decrease in benefits. Additionally, provide a copy of the form that will be used for this purpose.</i></p> |

Meal Access & Reimbursement: Meal Counting and Claiming

- | | | |
|---|--|--|
| <p>8 All Sites: 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.</p> | <p>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 https://www.azed.gov/hns/nsfp/forms under the Operational tab. The Step-by-Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at https://www.azed.gov/hns/nsfp/training under the Online Training Library tab.</p> | <p><i>Please provide a completed daily edit check worksheet for the month of [month requested]. 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></p> |
| <p>9 The local meal charge policy does not align with state-specific restrictions outlined in HNS14-2017. Specifically, paid students can charge 10 meals; however, reduced students can only charge 3 meals.</p> | <p>Discussed the Unpaid Meal Charge Policy and referred to memos SP 29-2017, SP 29-2017a, SP 23-2017 and HNS 14-2017, which can be found on ADE's website at https://www.azed.gov/hns/memos.</p> | <p><i>Please provide a copy of the revised local meal charge policy that demonstrates compliance with the state's specific requirements.</i></p> |

- | | | |
|---|---|--|
| <p>10 AAEC - SMCC Campus, Bennett Academy, Bennett Academy - Venture Site, Career Success School - Sage Campus, Pioneer Technology & Arts Academy of Arizona and Pleasantview Christian Elementary: The site application in CNPWeb does not accurately reflect procedures that were observed on-site. Specifically, CNPWeb site applications indicates 'Central Kitchen'; however, these sites are actually 'Satellite Kitchen'.</p> | <p>Advised SFA to update site application in CNPWeb and contact their assigned specialist to let them know of the changes.</p> | <p><i>Please submit a new site application in CNPWeb that accurately reflects current procedures. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i></p> |
| <p>11 AAEC - SMCC Campus, Bennett Academy, Bennett Academy - Venture Site, Career Success School - Sage Campus, Pioneer Technology & Arts Academy of Arizona, Pleasantview Christian Elementary: A Free and Reduced-Price Policy Statement Addendum – Non-Pricing (breakfast) has not been submitted to ADE.</p> | <p>Referred them to FRPPS Addendum–Non-Pricing template found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Organizational tab.</p> | <p><i>An updated and signed Free and Reduced-Price Policy Statement Addendum–Non-Pricing has already been provided. No further corrective action is required.</i></p> |

Meal Pattern & Nutritional Quality: Offer Versus Serve

- | | | |
|--|---|--|
| <p>12 Milestones Charter School (1st lunch meal service) and Pioneer Technology & Arts Academy of Arizona (Breakfast in the Classroom): Offer versus Serve (OVS) was not implemented properly. Specifically, students were not given the option to decline component.</p> | <p>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 https://www.azed.gov/hns/nslp under the Guidance Manuals tab.</p> | <p><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></p> |
| <p>13 Pioneer Technology & Arts Academy of Arizona (Breakfast in the Classroom): Staff have not been properly trained on OVS.</p> | <p>Discussed plan for ensuring staff are trained on OVS, including how and who will provide. Discussed proper implementation with kitchen and point of service staff. USDA's Offer Versus Serve Manual, Effective beginning School Year 2015-2016 can be found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals tab.</p> | <p><i>Please provide a written plan for ensuring that Breakfast in the Classroom staff are properly trained on OVS.</i></p> |

- | | | |
|---|---|---|
| <p>14 Pioneer Technology & Arts Academy of Arizona (Breakfast Grab n Go): Signage which explains what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable was not displayed to students at breakfast.</p> | <p>Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage 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 the sign that has been displayed explaining what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i></p> |
| | | |
| <p>15 Career Success School - Sage Campus: Offer versus Serve (OVS) was not implemented properly. Specifically, students were not given the option to receive a larger portion of any component. Specifically, one student was denied a larger portion of cucumber and was instructed to take carrots instead of the larger portion of cucumber.</p> | <p>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 https://www.azed.gov/hns/nslp under the Guidance Manuals tab.</p> | <p><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></p> |

Meal Pattern & Nutritional Quality: Meal Components and Quantities

- | | | |
|--|---|--|
| <p>16 Pioneer Technology & Arts Academy of Arizona: Signage which explains what constitutes a reimbursable meal was not displayed to pre-k students at breakfast and lunch.</p> | <p>Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage 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 the sign that will be displayed to students that demonstrates what constitutes a reimbursable meal at breakfast and lunch. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i></p> |
| | | |
| <p>17 Career Success School - Sage Campus: OVS and Serve Only reimbursable meal signage was displayed to pre-k students at breakfast; however, Serve Only is implemented.</p> | <p>Discussed removing OVS breakfast reimbursable meal signage from pre-k classroom.</p> | <p><i>OVS breakfast reimbursable meal signage has already been removed. No further corrective action is required.</i></p> |

Resource Management

- | | | |
|---|---|--|
| <p>18 Unallowable costs were paid for by the nonprofit school food service account: New AC Unit (\$8,866.22), Slab for Walkin Cooler/Freezer (\$4,900) and labor/material to cut and frame door opening (\$2,800).</p> | <p>Discussed specific unallowable expenses. An extensive list of allowable and unallowable costs can be found in 2 CFR 200 Subpart E General Provisions for Selected Items of Cost.</p> | <p><i>Please develop procedures for determining the allowability of costs as required by 2 CFR 200.303(b)(7). Please also provide written assurance that all expenses of the nonprofit school food service account will be limited to those costs which are necessary, reasonable, allocable; and also that these costs are in accordance with 2 CFR 200 Subpart E Cost Principles. Additionally, please provide supporting documentation which reflects that the total amount of unallowable costs \$16,566.22 was reimbursed to the nonprofit school food service account.</i></p> |
| <p>19 Equipment was purchased with an acquisition cost greater than \$5,000 and prior approval from the ADE was not obtained. Specifically, Deposit for kitchen walk in and equipment (\$54,827.47) includes 2 items that did not have prior approval from ADE: Walkin Cooler/Freezer (\$58,535.40) and One Type 2 Hood (\$9,556.80).</p> | <p>Discussed requirement that all equipment purchases with a per unit acquisition cost of \$5,000 or more must be pre-approved by ADE. Discussed that costs that would otherwise be allowable may be made unallowable by the action or inaction of the SFA. Additionally, the Capital Expenditure Pre-Approval Request Form can be found on the ADE's website at https://www.azed.gov/hns/nslp/forms under the Financial tab. Step-by-Step Instruction: How to Complete the Capital Expenditure Pre-Approval Request Form 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 circumstances which caused the equipment to be purchased (deposit made) before obtaining State Agency approval. Additionally, please provide a written plan that outlines the steps which will be taken to ensure equipment will not be purchased with the nonprofit school food service account without receiving prior approval from ADE. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete the Capital Expenditure Pre-Approval Request Form must be submitted.</i></p> |
| <p>20 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. Specifically, sites began selling a la carte items the week prior to the on-site review.</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. The Non-Program Food Revenue Tool & Calculator can be found on the ADE's website at https://www.azed.gov/hns/nslp/forms under the Financial tab. Additionally, Step-by-Step Instruction: How to Complete the Non-Program Food Revenue Tool 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 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. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete the Non-Program Food Revenue Tool must be submitted.</i></p> |

21	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.	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/nslp/forms/ under the Financial accordon.	<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>
----	--	--	--

Procurement

No Findings

General Program Compliance: Civil Rights

22	The USDA nondiscrimination statement was not printed on appropriate program materials (SBP Outreach, SFSP Outreach, Afterschool Snack Menu and Unpaid Meal Charge Policy).	Discussed where to find nondiscrimination statement on ADE's website at https://www.azed.gov/hns/civilrights and whether long or short statement would be most appropriate.	<i>An updated SFSP Outreach material with the correct nondiscrimination statement has already been provided. Please provide an updated Afterschool Snack Menu and Unpaid Meal Charge Policy with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i>
23	The USDA nondiscrimination statement used on program materials (Breakfast and Lunch Menus) is not the most current USDA statement.	Discussed where to find nondiscrimination statement on ADE's website at https://www.azed.gov/hns/civilrights and whether long or short statement would be most appropriate.	<i>Updated Breakfast and Lunch Menus with the correct nondiscrimination statement has already been provided. No further corrective action is required.</i>

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

- | | | |
|--|--|---|
| 24 Professional Standards training hours are not being tracked on an annual basis. | Referred to ADE's Training Tracking forms found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Professional Standards tab. 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 Courses tab. | <i>Professional Standards training tracking forms have already been provided. No further corrective action is required.</i> |
|--|--|---|

General Program Compliance: Water

No Findings.

General Program Compliance: Food Safety, Storage and Buy American

- | | | |
|--|---|---|
| 25 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: Apple & Eve Juice and Cucumbers, Mexico. Additionally, documentation justifying a Buy American exception was not maintained/on file. | 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. | <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> |
| 26 AAEC - SMCC Campus, Bennett Academy and Bennett Academy - Venture Site: 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> |
| 27 Milestones Charter School: The written food safety plan was not site specific. Specifically, FFVP SOP was included; however, this site does not participate in FFVP. Additionally, it indicated Satellite Kitchen; however, this site is actually the Central Kitchen. | Discussed the written food safety plan must be site specific. | <i>Please provide a written description of monitoring approaches that will be put in place to ensure the written food safety plan is site specific.</i> |

General Program Compliance: Reporting and Recordkeeping

28	Bennett Academy: Records documenting the most recent health inspection was not kept on file for the minimum required 5 years.	Discussed record keeping requirements and timeframe of 5 years.	<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>
29	The broccoli recipe provided is not accurate. Specifically, 1/2c broccoli credits as 1/2c vegetable; however, the recipe states it credits as 3/4c vegetable.	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 and https://foodbuyingguide.fns.usda.gov/ .	<i>Please provide an updated recipe for broccoli. Additionally, please provide a written description of changes made to ensure weights and measurements are correctly reflected on recipes.</i>
30	The carrot sticks recipe provided is not accurate. Specifically, it states 1 case (10lb) carrot sticks provides 35.5 - 1/2c portions; however, it provides 77 - 1/2c portions.	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 and https://foodbuyingguide.fns.usda.gov/ .	<i>Please provide an updated recipe for cauliflower. Additionally, please provide a written description of changes made to ensure weights and measurements are correctly reflected on recipes.</i>
31	The celery sticks recipe provided is not accurate. Specifically, it states 1 case (20lbs) provides 82- 1/2c portions; however, it provides 140 - 1/2c portions.	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 and https://foodbuyingguide.fns.usda.gov/ .	<i>Please provide an updated recipe for celery sticks. Additionally, please provide a written description of changes made to ensure weights and measurements are correctly reflected on recipes.</i>
32	The cucumber recipe provided is not accurate. Specifically, it states 5lbs of cucumber provides 32 - 1/2c portions; however, it provides 31 - 1/2c portions.	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 and https://foodbuyingguide.fns.usda.gov/ .	<i>Please provide an updated recipe for cucumber. Additionally, please provide a written description of changes made to ensure weights and measurements are correctly reflected on recipes.</i>

- | | | | |
|----|--|---|--|
| 33 | The hamburger recipe provided is not accurate. Specifically, it credits as 2 oz/eq grain; however, the recipe states it credits as 2.25oz/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 https://www.azed.gov/hns/nslp/forms under the Menu Planning tab and https://foodbuyingguide.fns.usda.gov/ . | <i>Please provide an updated recipe for hamburger. Additionally, please provide a written description of changes made to ensure weights and measurements are correctly reflected on recipes.</i> |
| 34 | The potato smiles recipe provided is not accurate. Specifically, 1/2c potato smiles credits as 1/2c vegetable; however, the recipe states it credits as 3/4c vegetable. | 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 and https://foodbuyingguide.fns.usda.gov/ . | <i>Please provide an updated recipe for potato smiles. Additionally, please provide a written description of changes made to ensure weights and measurements are correctly reflected on recipes.</i> |
| 35 | The ranch beans recipe provided is not accurate. Specifically, 1/2c ranch beans credits as 1/2c vegetable; however, the recipe states it credits as 3/4c vegetable. | 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 and https://foodbuyingguide.fns.usda.gov/ . | <i>Please provide an updated recipe for ranch beans. Additionally, please provide a written description of changes made to ensure weights and measurements are correctly reflected on recipes.</i> |
| 36 | The cauliflower recipe provided is not accurate. Specifically, it states 100g of cauliflower provided 27 - 1/2c portions; however, 3lbs cauliflower provides 27 - 1/2c portions. | 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 and https://foodbuyingguide.fns.usda.gov/ . | <i>Please provide an updated recipe for cauliflower. Additionally, please provide a written description of changes made to ensure weights and measurements are correctly reflected on recipes.</i> |

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

- | | | | |
|----|--|---|---|
| 37 | 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 and locations where breakfast is available 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>An updated School Breakfast Program (SBP) outreach material has already been provided. No further corrective action.</i> |
|----|--|---|---|

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

Not Applicable.

Other Federal Program Reviews: Special Milk Program

Not Applicable.

Other Federal Program Reviews: At-Risk Afterschool Meals

- | | | | |
|----|--|--|--|
| 38 | Pioneer Technology & Arts Academy of Arizona: Staff have not been properly trained on OVS. | 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 https://www.azed.gov/hns/nslp under the Guidance Manuals tab. | <i>Cafeteria staff have not been properly trained on OVS. Additionally, please provide written assurance that moving forward, OVS will be implemented properly.</i> |
| 39 | Pioneer Technology & Arts Academy of Arizona: Supper and lunch meal count totals month of review were not correctly combined and recorded. | 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 by eligibility category.</i> |

- | | | |
|--|---|---|
| <p>40 Pioneer Technology & Arts Academy of Arizona: Acceptable education or enrichment activities were not made available while At-Risk Afterschool Meals are being offered.</p> | <p>Discussed an educational or enrichment activity must be available while meals are being offered. These programs must be regularly scheduled, organized, and supervised by the entity that is sponsoring the program. These educational or enrichment activities must be open to all children up to the age of 18. Additionally, discussed children who are receiving meals are not required to participate in these activities, but the activities need to be available to all. Online Course: Operating At-Risk Afterschool Meals for School Food Authorities can be found on ADE's at https://www.azed.gov/hns/afterschool/trainingforSFAs under the Online Course tab.</p> | <p><i>Please provide a written description of the changes that have been made to the education or enrichment activities made available while At-Risk Afterschool Meals are being offered.</i></p> |
| <p>41 Pioneer Technology & Arts Academy of Arizona: Lunch weekly meal pattern requirements were not met under the NSLP meal pattern. Specifically, lunch is only served 1 day a week and cannot meet weekly requirements. Reviewer confirmed all weekly and daily meal pattern requirements were met by combining 1 day lunch with 5 day supper menu.</p> | <p>Discussed implementing CACFP meal pattern for lunches served on Saturday. Additionally, discussed claiming Saturday lunches with Monday-Friday supper and completing the Designated Meal Time Exemption Form. Referred Designated Meal Time Exemption Form.</p> | <p><i>Please provide a written description of the changes that have been made to ensure meals served on Saturdays meet meal pattern requirements.</i></p> |

Comments/Recommendations:

Milestones Charter School has completed the Administrative Review in the 2022-2023 SY. Thank you for your sense of urgency and hospitality throughout the review process.

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 \$75.06
☒ No- NSLP ☐ Yes- NSLP

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by June 6, 2023 to Jennifer McDonlad@azed.gov
Sufficient corrective action has already been provided for finding #'s 1-37.

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.

www.azed.gov – (602) 542-8700 – 1535 West Jefferson Street • Phoenix, Arizona 85007 Bin # 7
This institution is an equal opportunity provider