



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: New Horizon School for the Performing Arts

CTD: 07-87-71

Site(s): New Horizon School for the Performing Arts

Contacts: Jann Wyler, Director/Principal and Tania Alba, Lunch Program Director

Review Date: May 4, 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

1	Meal count totals by category for the month of review were not correctly combined and recorded. This was deemed a non-systemic error and contributed toward fiscal action calculations.	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>
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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

2	An individual separate from the application approval process has not been designated as the hearing official.	Discussed school official who could be designated. Referred to Hearing Procedure section in USDA's Eligibility Manual for School Meals found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion.	<i>Please provide the name and title of the individual designated as the hearing official. Additionally, please provide documentation to demonstrate where households are notified of the hearing official.</i>
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Meal Access & Reimbursement: Verification			
3	The person designated as the confirming official is the same person who makes eligibility determinations.	Discussed requirement for having a designated official for conducting confirmation reviews who is not the same person who determined eligibility. The Online Training: Verification Review found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion.	<i>Please provide the name and title of the individual designated as the confirming official. Additionally, please provide written assurance that the person designated as the confirming official will not be the same person who determines eligibility.</i>
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			
4	Written codes of conduct that are consistent with prohibiting real, or apparent conflicts of interest of employees engaged in selection, award, and administration of contracts	Discussed that non-Federal entities must have and use written codes of conduct that are consistent with State, local, and tribal laws and regulations and the standards of the Code of Federal Regulations for the acquisition of property or services required under a Federal award or subaward. The non-Federal entity's documented written codes of conduct must conform to the procurement standards identified in 2 CFR 200.318.	<i>Please provide a written code of conduct that are consistent with 2 CFR 200.318</i>
5	The SFA did not provide documented procurement procedures.	Discussed that non-Federal entities must have and use documented procurement procedures, consistent with State, local, and tribal laws and regulations and the standards of the Code of Federal Regulations for the acquisition of property or services required under a Federal award or subaward. The non-Federal entity's documented procurement procedures must conform to the procurement standards identified in 2 CFR 200.317 through 2 CFR 200.327.	<i>Please provide written procurement procedures that are consistent with 2 CFR 200.317 through 2 CFR 200.327.</i>

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| 6 | The SFA did not maintain records sufficient to detail the significant history of the procurement for formal purchases. Specifically, insufficient evaluation and award documentation was maintained for the following formal purchases: Healthy Innovations. | 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 formal purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.</i> |
| 7 | The SFA did not evaluate and award the bids/offers accurately for the following formal purchases: Healthy Innovations. | 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 formal 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> |
| 8 | The SFA did not maintain records sufficient to support the use of the emergency noncompetitive procurement method. 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 noncompetitive purchases: Healthy Innovations. | Discussed that, consistent with procurement regulations at 2 CFR 200.318(i), SFAs should retain information, data, and documents which qualify specific conditions and emergency circumstances which resulted in the decision to use the emergency noncompetitive procurement method and the procurement process, itself. Failure to plan for transition to competitive procurement cannot be the basis for continued use of noncompetitive procurement based on exigency or emergency circumstances. Documentation must include an explanation of the rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price. In addition, SFAs should retain documentation providing information on the food and supplies (e.g., delivery, processing, other) being procured, including the estimated quantity and dollar value of the emergency procurement; and how the emergency procurement was handled (i.e., obtained through negotiation, phone, email, etc.). | <i>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 noncompetitive purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.</i> |
| 9 | 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: Healthy Innovations. | 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 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.</i> |

10	The SFA did not maintain records sufficient to detail the significant history of the procurement for formal purchases. Specifically, the request for proposals with required clauses, Buy American requirements, and written method for conducting evaluations of proposals was not provided for the following formal purchases: Healthy Innovations.	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 for the request for proposals with required clauses, Buy American requirements, and written method for conducting evaluations of proposals will be maintained for all formal purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.</i>
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General Program Compliance: Civil Rights

11	The most up to date "And Justice for All" poster was not displayed.	Discussed requirements of where poster must be placed 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 most up to date 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

No Findings.

General Program Compliance: Local Wellness Policy

No Findings.

General Program Compliance: Competitive Food Services

No Findings.

General Program Compliance: Professional Standards

12	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.</i>
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13	The School Nutrition Program Manager did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.	Discussed 10 hour training requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at https://www.azed.gov/hns/nslp/training/ . 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 Manager is registered for.</i>
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General Program Compliance: Water

No Findings.

General Program Compliance: Food Safety, Storage and Buy American

14	Documentation was not maintained to support that the school received two food safety inspections from the local health department each school year, or that the school requested two food safety inspections each year from the local health department.	Discussed that each site operating must obtain two food safety inspections from the local health department per school year or maintain documentation to show that two food safety inspections were requested from the local health department each school year.	<i>Please provide written assurance that documentation to show that two food safety inspections were received and/or requested from the local health department each school year will be maintained. .</i>
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General Program Compliance: Reporting and Recordkeeping

No Findings.

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

No Findings.

Other Federal Program Reviews: Afterschool Snack Program

Not Applicable.

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:

Congratulations, New Horizon School for the Performing Arts 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 and Breakfast 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?

<input checked="" type="checkbox"/> No- SBP	<input type="checkbox"/> Yes- SBP	\$8.01
<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 10, 2023 to Megan.Lynch@azed.gov.

Reviewer Signature	Date
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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.