

# **Health and Nutrition Services Division**

# **Administrative Review Summary Report**

CTD: 01-39-03 Site: Many Farms Community School  Contacts: Leon Oosahwe and Melissa Descheenie  Review Date: April 25, 2023 Review Period: March 2023 Programs Reviewed:	School Food Authority Name	e: Many Farms Comi	munity Scho	ool, Inc		
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#### Meal Pattern & Nutritional Quality: Meal Components and Quantities

1 Quantities observed at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly grain requirements were not met (7.75 oz eq out of 8 oz eq met) for lunch during the review period.

Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. Meal pattern requirements for the National School Lunch Program can be found on ADE's website at

http://www.azed.gov/hns/nslp under the Meal Pattern accordion. The Stepby-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at

http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at

http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).

Discussed how current system allowed Please provide a written description of the for this to happen and potential changes that could be made to ensure that weekly grain quantities meet minimum it doesn't continue (e.g., changes in amounts required by the meal pattern.

# Resource Management

No findings.

#### **Procurement**

2 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.

Please provide written procurement procedures that are consistent with 2 CFR 200.317 through 2 CFR 200.327.

3 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 items.

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. Additionally, please provide written assurance that all records will be maintained for 5 years.

4 Small purchase procedures were not in compliance with procurement requirements. Specifically, no solicitation documentation was provided for the following small purchases: food items.

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.

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.

5 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 items.

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.

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.

6 The SFA did not evaluate and award the bids/offers accurately for the following small purchases: food items.

Discussed that, when making small and responsible vendors must be conducted using evaluation criteria where award is based on the lowest responsive, responsible quote.

Please provide a written description of purchases, an evaluation of responsive 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.

#### **General Program Compliance: Civil Rights**

The USDA nondiscrimination statement used on Discussed where to find program materials is not the most current USDA nondiscrimination statement on ADE's statement. Specifically, the nondiscriminations statement used on the Civil Rights discrimination complaint form is not the most current.

website at https://www.azed.gov/hns/civilrights 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.

8 The "And Justice for All" poster was not the most current version on display.

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.

Provided SFA with most current "And Justice for All" poster on-site; no further corrective action is required.

9 The public/media release was not provided to local media, the unemployment office and local employers considering large layoffs.

Discussed requirements and timeframe for public/media release, and best options locally for submitting at

https://www.azed.gov/hns/nslp/forms/. Discussed who would be responsible for doing this.

Please provide written procedures for distributing the public/media release and written assurance that the public/media the release to. Showed where template release will be submitted to the local media, release can be found on ADE's website the unemployment office and local employers considering large layoffs prior to the start of each school year.

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.	· · · · · · · · · · · · · · · · · · ·			
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No findings.				
	General Program Compliance: Water			
No findings.				
	General Program Compliance: Food Safety, Storage and Buy American			
No findings.		•		

## General Program Compliance: Reporting and Recordkeeping

10 Production record crediting is inaccurate. Specifically, cream of wheat served at breakfast components and ensuring consistency on March 28, 2023 credited as 6 oz eq grains; however, the product formulation statement for cream of wheat indicated it contained 1.75 oz eq grains.

Discussed how to credit meal 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 accordion.

Please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.

11 Production record crediting is inaccurate. Specifically, two items served at breakfast and one item served at lunch were undercredited (WG bagel as 1.0 oz eq on March 30, 2023, baked French toast as 1.0 oz eq on March 31, 2023 and taco soup as 0 oz eq on March 27, 2023, respectively; however, the production record indicated it contained 2.0 oz eq, 1.50 oz eq, and 1.25 oz eq, respectively.

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 accordion.

Please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.

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

No findings.

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

12 The Afterschool Snack Program (ASP) monitoring review was not conducted within the requirements. A sample ASP first four weeks of operation and one additional monitoring form can be found on time during the school year.

Discussed ASP monitoring ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational accordion.

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.

#### 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! Many Farms Community School, Inc has completed the Administrative Review for the 2022-2023 school year. Thank you for your hospitality during the review process. You are doing an outstanding job implementing the NSLP. It is evident you are working hard to make sure students are fed healthy meals.

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	\$0
✓ No- NSLP	☐ Yes- NSLP	\$0
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Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by August 7, 2023 to Leslie Jhung at Leslie.Jhung@azed.gov.

Leslie Jhung 6/19/2023
Reviewer Signature Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the <a href="School Food Authority Appeal Procedure for the Administrative Review">School Food Authority Appeal Procedure for the Administrative Review</a> 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
"We are a service organization committed to raising academic outcomes and empowering parents."

This institution is an equal opportunity provider.