



# ARIZONA DEPARTMENT OF EDUCATION

## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Our Lady of Perpetual Help School  
CTD: 07-20-08  
Site: Our Lady Perpetual Help School

Contacts: Jeanette Weivoda, Principal and Alma Bernal, Cafeteria Manager

Review Date: January 25, 2024

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

1	One application (2 students) was certified utilizing incomplete information. Specifically, the application was certified without Social Security Number information completed.	Discussed errors found and required corrective action. Referred to Processing Applications and Reviewing Applications Based on Income sections in USDA's Eligibility Manual for School Meals found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals accordion. Suggested completing the training: Step-by-Step Instruction: How to Process Household Applications 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 Library accordion.	<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 processing income applications.</i>
2	Two students were incorrectly provided free eligibility benefits based on Direct Certification via Medical Assistance (MA) Reduced. This contributed towards fiscal action calculations.	Discussed errors found and required corrective action. Suggested completing the training: Step-by-Step Instruction: How to Complete Direct Certification Using Medicaid Data 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 Library accordion.	<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 transferring direct certification matches to the benefit issuance document.</i>

#### Performance Standard 1: Meal Counting and Claiming – Critical Area

3	During the month of review, it was found that there were 3 days in which the meal counts exceeded the number of eligible students. Specifically, reduced-price breakfasts exceeded reduced-price eligible students on 12/1/23, 12/4/23, and 12/6/23 and reduced-price lunches exceeded reduced-price eligible students on 12/1/23 and 12/4/23. This 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. Discussed using daily edit checks to monitor this. A Daily Edit Check Worksheet can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/forms/">http://www.azed.gov/hns/nslp/forms/</a> under the Operational accordion.	<i>Please provide a written description of changes to the system that have been implemented to ensure that meal counts do not exceed the number of eligible students.</i>
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**Performance Standard 2: Meal Components & Quantities – Critical Area**

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No findings.

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

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No findings.

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

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| 4 | Direct certification matches were not conducted according to the proper time frames, which is at least once at or around the beginning of the school year, three months after the initial effort and six months after the initial effort. | Referred to Direct Certification for Assistance Programs section in USDA's Eligibility Manual for School Meals found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals accordion. The NSLP At A Glance Calendar for School Food Authorities 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 Calendar and Checklists accordion. | <i>Please provide a written description of the changes that have been implemented to ensure direct certification will be conducted according to the proper time frames. Additionally, please provide written assurance that, moving forward, direct certification will be run according to the prescribed timeframes for all students enrolled.</i> |
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**Meal Access & Reimbursement: Verification**

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| 5 | 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> 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 <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> 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>  |
| 6 | The applications subject to verification were not properly selected in accordance with the sample size option used. Specifically, error-prone applications were not selected for verification when using the Standard sampling method. Additional applications were determined to be error-prone during review and should have been subjected to verification. | Discussed requirement of selecting from error-prone applications and potential methods of identifying them. Referred to Error-Prone Worksheet 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 Eligibility Documents for School Meal Benefits accordion. The Step-by-Step Instruction: How to Identify Household Applications That Are Error-Prone 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 Library accordion.            | <i>Please provide a written description of how error-prone applications will be identified and written assurance that applications to be verified will be selected from error-prone applications. Additionally, the certificate of completion of Step-by-Step Instruction: How to Identify Household Applications That Are Error-Prone must be submitted.</i> |

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| 7 | Direct verification was not conducted appropriately. Specifically, direct verification was conducted on the entire school population.                                      | Discussed proper verification procedures and referred to Verification Tracking Form and Online Training: Verification Review 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 Eligibility Documents for School Meal Benefits accordion. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals accordion. | <i>Please provide a written description of the procedures that will be followed when conducting direct verification. Additionally, the certificate of completion of Step-by-Step Instruction: How to Conduct Direct Verification in CNP Direct Certification/Direct Verification must be submitted.</i> |
| 8 | Verification activities were not completed by November 15. Specifically, the selected students for verification were run through direct verification on December 11, 2023. | Discussed requirement for completion of verification activities by November 15, as well as specifics on what those activities are. Referred to Verification Best Practices Calendar and Online Training: Verification Review found at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Calendars and Checklists accordion.   | <i>Please provide a written description of the steps that will be taken to ensure verification activities are completed during the required timeframes. Additionally, please provide written assurance that verification will be completed by November 15 each year.</i>                                |

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

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| 9  | Meals counted for reimbursement during field trips are not served through an adequate point of service. Specifically, meal counts are taken at the beginning of the day prior to the field trip occurring. | Discussed potential procedures that will be implemented (such as rosters being completed during field trip), as well as who would be responsible.   | <i>Please provide a written description of procedures that have been implemented to ensure that meals served during field trips are counted through an adequate point of service.</i>  |
| 10 | 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 <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 <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 most recently submitted claim month. 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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| 11 | Sufficient documentation to support compliance with paid lunch equity requirements has not been maintained. Specifically, the site is charging \$3.35 for paid lunch when the USDA minimum requirement is \$3.56 and a PLE Tool was not completed to support the lower charge. | Discussed requirements for Paid Lunch Equity, referred to the PLE Tool, and discussed keeping the tool on file, as well as any communication with ADE regarding PLE.   | <i>Please provide a written description of procedures that will be completed each school year to assess the need to raise paid lunch prices. Additionally, please provide written assurance that the PLE Tool or other appropriate documentation to support compliance with paid lunch equity requirements will be maintained.</i>  |
| 12 | Lunches served to teachers, administrators, custodians, and other adults were provided free of charge.   | Discussed that only program adults who have duties directly related to food service (e.g., meal counting and claiming, meal preparation, meal service, etc.) may receive meals using Federal program funds and that non-program adults (e.g., teachers supervising their classrooms) must use non-Federal funds to cover the meal cost. Discussed ways to determine adult meal prices which included a per meal cost analysis or pricing adult meals to reflect the amount of reimbursement received for a free meal plus the per meal value of entitlement and bonus commodities. Referred to the Adult Meal Pricing Tool located on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Financial accordon. | <i>Please provide a written description of the steps which have been taken to ensure Federal program funds are not used to provide meals to non-program adults. Additionally, please submit a written communication provided to staff that includes the price for an adult lunch and the method of payment should a non-program adult wish to purchase a meal or please submit a written procedure for covering the cost of adult meals with non-Federal funds.</i> |
| 13 | Documentation was not provided to support the usage of Supply Chain Assistance funds. Additionally, a plan was not provided for the use of \$10,835.41 of Supply Chain Assistance funds.   | Discussed that the attestation statement signed by the SFA detailed that the SFA will use 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 <a href="https://www.azed.gov/hns/memos">https://www.azed.gov/hns/memos</a> .   | <i>Please provide a plan on how the \$10,835.41 of Supply Chain Assistance funds will be spent. Additionally, provide a written description of how documentation of expenses will be maintained.</i>  |

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**Procurement**

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| 14 | The SFA did not perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold. Specifically, a cost or price analysis was not provided for the following goods/services: L&M Catering Co. | Discussed that a cost or price analysis must be performed for every procurement action in excess of the Simplified Acquisition Threshold, including contract modifications, before receiving bids or proposals. A price analysis will be used to determine the reasonableness of the proposed contract price. | <i>Please provide a written description of the procurement procedures that will be implemented for conducting the cost or price analysis prior to any formal procurement action. Additionally, please provide written assurance that all records will be maintained for 5 years.</i> |
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<p>15 The SFA did not maintain records sufficient to detail the significant history of the procurement for formal purchases. Specifically, the solicitation documentation including 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: L&amp;M Catering Co. Additionally, responses to the solicitation, evaluation documentation, or award documentation were not provided.</p>	<p>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.</p>	<p><i>Please provide a written description of procurement procedures that will be implemented to ensure that sufficient records for the solicitation documentation including request for proposals with required clauses, Buy American requirements, and written method for conducting evaluations of proposals are maintained along with responses to the solicitation, evaluation documentation, and award documentation. Additionally, please provide written assurance that all records will be maintained for 5 years.</i></p>
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**General Program Compliance: Civil Rights**

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<p>16 The public/media release was not provided to local media, the unemployment office, and local employers considering large layoffs.</p>	<p>Discussed requirements and timeframe for public/media release, and best options locally for submitting the release to. Showed where template release 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>. Discussed who would be responsible for doing this.</p>	<p><i>Please provide written procedures for distributing the public/media release and written assurance that the public/media release will be submitted to the local media, the unemployment office and local employers considering large layoffs prior to the start of each school year.</i></p>
<p>17 Sufficient documentation to support accommodations for special diets has not been maintained. Specifically, there is no form made available to accommodate students with dietary needs that deviate from meal pattern requirements.</p>	<p>Discussed requirements for accommodating special diets and the need for sufficient documentation. Referred to Medical Statement for Students with Special Dietary Accommodations 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 Operational accordion. Additionally, referred to Accommodating Children with Disabilities in the School Meal Program found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals accordion. Step-by-Step Instruction: How to Complete the Medical Statement for Students with Special Dietary Accommodations 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 Library accordion.</p>	<p><i>Please provide written procedures for maintaining documentation supporting accommodations for special diets and written assurance that sufficient documentation to support accommodations for special diets will be maintained. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete the Medical Statement for Students with Special Dietary Accommodations must be submitted.</i></p>

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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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18 A recent assessment of the implementation of the Local Wellness Policy (LWP) has not been conducted nor have plans been developed to complete the assessment.	<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. Additionally, discussed feasible means for notifying the public of the results of the most recent assessment. 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>	<i>Please provide a written plan for conducting an assessment of the implementation of the Local Wellness Policy. 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>
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**General Program Compliance: Competitive Food Services**

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19 The school fundraisers were not in compliance with HNS 20-2019: Revision to Arizona Department of Education Policy on Specially Exempted Fundraisers. Specifically, the student council hot chocolate fundraiser was not reported to the State agency.	<p>HNS 20-2019: Revision to Arizona Department of Education Policy on Specially Exempted Fundraisers that can be found on ADE's website at <a href="https://www.azed.gov/hns/memos">https://www.azed.gov/hns/memos</a>. The Online Course: Smart Snacks and Competitive Foods Standards in Arizona 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 Library accordion.</p>	<i>Please provide written assurance that fundraisers will be in compliance with HNS 20-2019: Revision to Arizona Department of Education Policy on Specially Exempted Fundraisers.</i>
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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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| 20 | The site application in CNPWeb indicated that Our Lady of Perpetual Help School is participating in the Afterschool Snack Program; however, the site is not participating in the Afterschool Snack Program. | Discussed steps required to update the site application in CNPWeb to reflect current practice of not participating in the Afterschool Snack Program. | <i>Please resubmit a site application for Our Lady of Perpetual Help School indicating that it is not participating in the Afterschool Snack Program. Additionally, please provide written assurance that the site application in CNPWeb will accurately reflect current practices.</i> |
| 21 | The benefit issuance document did not accurately reflect method of certification. Specifically, the agency by which eligibility was derived was not accurate for 16 students.                               | Discussed that eligibility certification, including method of certification, must be properly transferred to the benefit issuance document.          | <i>Corrections have been made to the benefit issuance document. Please provide written procedures that will be implemented to ensure that the benefit issuance document reflects the method of certification indicated on the direct certification reports.</i>                         |

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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 2024 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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*Not applicable.*

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**Comments/Recommendations:**

Congratulations! Our Lady of Perpetual Help School has completed the administrative review for the 2023-2024 school year. Thank you for your hospitality and organization during the review process. It is evident that you are working hard to ensure your students are fed healthy meals in a welcoming environment.

**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?

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| <input checked="" type="checkbox"/> No- SBP  | <input type="checkbox"/> Yes- SBP  | \$45.20 |
| <input checked="" type="checkbox"/> No- NSLP | <input type="checkbox"/> Yes- NSLP | \$66.87 |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by March 29, 2024 to Tania Felix at [Tania.Felix@azed.gov](mailto:Tania.Felix@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.

Tom Horne, Superintendent of Public Instruction  
1535 West Jefferson Street • Phoenix Arizona 85007 • [www.azed.gov](http://www.azed.gov)  
“We are a service organization committed to raising academic outcomes and empowering parents.”

This institution is an equal opportunity provider.