



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Legacy Traditional School - North Chandler

CTD: 07-84-09

Site(s): Legacy Traditional School – Avondale, Legacy Traditional School - Casa Grande, Legacy Traditional School – Chandler, Legacy Traditional School - Deer Valley, Legacy Traditional School - East Mesa, Legacy Traditional School - East Tucson, Legacy Traditional School – Gilbert, Legacy Traditional School – Glendale, Legacy Traditional School – Goodyear, Legacy Traditional School - Laveen Village, Legacy Traditional School – Maricopa, Legacy Traditional School – Mesa, Legacy Traditional School - North Chandler, Legacy Traditional School - North Phoenix, Legacy Traditional School - Northwest Tucson, Legacy Traditional School – Peoria, Legacy Traditional School – Phoenix, Legacy Traditional School - Queen Creek, Legacy Traditional School – Surprise, Legacy Traditional School - West Surprise, Legacy Traditional-San Tan

Contacts: Mia Vega, Superintendent, Brittany Fuentes, Food Service Director and Elizabeth Fulton, Food Service System Administrators

Review Date: January 22-26, 2023

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	The sponsor application in CNPWeb indicated that SFA is using the notification letter provided by ADE when the SFA is using a custom notification letter.	Discussed steps required to update the sponsor application in CNPWeb to reflect current practice of utilizing a custom notification letter.	<i>Please resubmit a sponsor application indicating that a custom notification letter is being used. Additionally, please provide written assurance that the Sponsor Application in ADE's CNPWeb will accurately reflect current practices.</i>
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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 finding.

Meal Access & Reimbursement: Verification

No finding.

Meal Access & Reimbursement: Meal Counting and Claiming

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| 2 | Meals counted for reimbursement during a field trip are not served through an adequate point of service. Specifically, meals are entered into the POS from list given to the cafeteria prior to the field trip. | Discussed potential procedures that will be implemented, 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> |
| 3 | 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 for the month of review at Legacy Traditional School - Casa Grande and Legacy Traditional School - Avondale. | 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 at https://www.azed.gov/hns/nslp/forms under the Operational accordion. The Step-by-Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion. | <i>Correction was made on-site, and no further action needed.</i> |
| 4 | The site application in CNPWeb does not accurately reflect the counting and claiming procedures that were observed on-site, specifically on half days. | Advised the SFA to update counting and claiming procedures during half days to ensure that all eligible participants have the opportunity to attend scheduled meal services. | <i>Corrections have been made by the SFA. Please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation, including practices that are employed during half days.</i> |

Meal Pattern & Nutritional Quality: Offer Versus Serve

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| 5 | Offer versus Serve (OVS) was not implemented properly. Specifically, students were not given the option to decline milk component, specifically at Legacy Traditional School - Chandler. | 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 accordion. | <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> |
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Meal Pattern & Nutritional Quality: Meal Components and Quantities

No findings.

Resource Management

No finding.

Procurement

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| 6 | 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 conducted for the following goods/services: Vertex Education | 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> |
| 7 | 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: Vertex Education. | 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> |
| 8 | The SFA did not have procedures for providing sufficient oversight of the procurement to ensure contractors performed in accordance with the terms, conditions, and specifications of their contracts. Specifically, procedures for providing sufficient oversight of the procurement were not provided for the following formal purchases: Vertex Education. | Discussed that non-Federal entities must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. | <i>Please provide a written description of procurement procedures that will be implemented to provide sufficient oversight of the terms, conditions, and specifications of awarded contracts. Additionally, please provide written assurance that all records will be maintained for 5 years.</i> |
| 9 | Small purchase procedures were not in compliance with procurement requirements. Specifically, no solicitation, evaluation, or award documentation was provided for the following small purchases: L&M Catering. | 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> |
| 10 | The SFA did not maintain oversight to ensure that contractors performed in accordance with the terms, conditions, and specifications of their contracts or purchase orders for the following small purchases: L&M Catering. | Discussed that non-Federal entities must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. | <i>Please provide a written description of the processes implemented to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.</i> |

11 The SFA did not maintain oversight to ensure that food purchases complied with the Buy American provision for the following small purchases: L&M Catering.	Discussed that the non-Federal entity should, to the greatest extent practicable under a Federal award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States. Domestic preferences for procurements must be included in all subawards including all contracts and purchase orders for work or products.	<i>Please provide a written description of the processes implemented to ensure sufficient oversight with Buy American compliance when making small purchases.</i>
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General Program Compliance: Civil Rights

No findings.

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 Professional Standards training hours are not being adequately tracked. Specifically, tracker used for professional standard is missing the professional standard learning code, which is required for proper documentation of the professional standards.	Referred to USDA's Professional Standards Training Tracker Tool and discussed requirements for tracking. Tracking forms found on ADE's website at https://www.azed.gov/hns/nslp/forms Discussed creating their own training tracker with all required information. 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 tracker that will be used to track Professional Standards training hours on an annual basis for all School Nutrition Program staff. Additionally, please provide written assurance that Professional Standards training hours will be tracked for all School Nutrition Program staff on an annual basis. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i>
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General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

13 The most recent food safety inspection report was not posted in a prominent location and was not visible to all program participants at Legacy Traditional School - West Surprise.	Discussed making copies of most recent report and feasible places for posting.	<i>Correction has been made on-site. No further corrective action needed.</i>
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| 14 | Temperatures are not consistently taken by using thermometers located inside of storage areas. Specifically, thermometer were missing in the milk cooler at Legacy Traditional Schools – Surprise and also in the three doors reach-in refrigerators and the walked in freezer at Legacy Traditional School - Chandler. | Discussed taking temperatures from inside of the storage areas for a more accurate reading. Referred to Arizona's School Food Safety Guidance found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Food/Health Safety accordion. Additionally, discussed Food Safety Online Training Library can be found on ICN's website at https://theicn.org/icn-resources-a-z/food-safety/ . | <i>Correction was made during on-site review. No further action is needed at this time.</i> |
| 15 | The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at Traditional School – Gilbert, Legacy Traditional School – Goodyear, Legacy Traditional School - San Tan, Traditional School - West Surprise and Legacy Traditional School - Deer Valley and Legacy Traditional School - Glendale for Frozen vegetable blend, frozen Broccoli, Cholula hot sauce (Product of Mexico) and Tajin (Product of 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 accordion. 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 accordion. | <i>Please provide a written description of the changes that have been made to recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i> |
| 16 | The most recent food safety inspection report was not posted in a prominent location and was not visible to all program participants at Legacy Traditional School - West Surprise. | 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> |

General Program Compliance: Reporting and Recordkeeping

No finding.

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

No finding.

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

17 Legacy Traditional School - Phoenix is not on track to spend no more than 10% of its total grant on administrative costs. Specifically, Legacy Traditional School - Phoenix has spent 20.5% of its total grant on administrative costs year-to-date.	Discussed administrative costs cannot exceed 10% of the total grant. Referred to Orientation to the Fresh Fruit and Vegetable Program.	<i>Please provide a written plan to ensure that administrative costs will not exceed 10% of the total grant this program year at Legacy Traditional School - Phoenix</i>
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Other Federal Program Reviews: Special Milk Program

Not applicable

Other Federal Program Reviews: At-Risk Afterschool Meals

Not applicable.

Comments/Recommendations:

Congratulations! Legacy Traditional School - North Chandler has completed the Administrative Review for the 2023-2024 school year. Thank you for your hospitality during the review process. You are doing an outstanding job implementing the NSLP. It is evident that you are working hard to ensure your students are fed healthy meals.

Congratulations! Based on your menu documentation provided for the week of review, you are serving 100% whole grain-rich items! If this extends to your entire menu, please take a moment to sign ADE's Whole Grain Pledge at <https://www.surveymonkey.com/r/WholeGrainRichPledge> and be recognized for providing 100% whole grain-rich items. ADE appreciates your efforts in continuing to provide quality meals to Arizona students.

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 **April 14, 2024** to Amy Dixon Banire at Amy.DixonBanire@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
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