



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Think Through Academy
CTD: 07-84-11
Site: Think Through Academy

Contacts: Najat Benaoussar, President and Brahim Benaoussar, Operational Manager

Review Date: January 30, 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	Multiple applications utilized incomplete information. Specifically, 3 applications (4 students) were certified with missing Social Security number information. This did not contribute toward fiscal action calculations.	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 https://www.azed.gov/hns/nslp under the Guidance Manuals accordion. 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 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 determining the eligibility status for each student.</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

2	The SFA was not properly implementing the 30-day carryover policy. Specifically, children's free or reduced-price eligibility status from the previous year was not carried over for up to 30 operating days into the new school year (or until a new eligibility determination was made).	Referred to Section 3: Establishing Eligibility 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 a written description of how benefit status will be carried over from the previous school year.</i>
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| 3 | Households eligible to receive free or reduced-price meal benefits are not being notified either verbally or in writing. | Referred to Notification of Eligibility Determination 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. Notification of Benefits Letter, School Meals can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Eligibility Documents for School Meal Benefits accordion. | <i>Please provide a copy of the written letter or documented procedure for verbal notification of households approved for free or reduced-price meal benefits. Additionally, please provide written assurance that all households eligible to receive free or reduced-price meal benefits will be notified verbally or in writing.</i> |
| 4 | Households that have been denied benefits are not notified via a written notification document. | Discussed households with children who are denied benefits must be provided with written notification of denial. Referred to Notification of Notification of Benefits Letter, School Meals found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Eligibility Documents for School Meal Benefits accordion. | <i>Please provide a copy of the written letter sent to all denied households. Additionally, please provide written assurance that all households that are denied benefits will be notified in writing.</i> |

Meal Access & Reimbursement: Verification

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| 5 | Verification procedures were not followed correctly. Specifically, households for whom benefits were to be reduced or terminated were not given 10 calendar days written advance notice of the change. | Discussed proper verification procedures and referred to ADE's Verification Tracking Form and Online Training: Verification Review 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 written procedures for ensuring that households for whom benefits were to be reduced or terminated will be given 10 calendar days written advance notice of the change.</i> |
| 6 | Verification activities were not completed by November 15. Specifically, the SFA began verification in January 2024. | 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 https://www.azed.gov/hns/nslp/forms under the Calendars and Checklists accordion. | <i>Please provide written assurance that verification will be completed by November 15 each year, as well as the steps that will be taken to ensure this requirement is adhered to.</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

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| 7 | Documentation was not provided to support the usage of Supply Chain Assistance funds. Additionally, a plan was not provided for the use of \$10,000.00 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 https://www.azed.gov/hns/memos . | <i>Please provide a plan on how the \$10,000.00 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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| 8 | 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 and Buy American requirements was not provided for the following small purchase: L&M Catering Co. Additionally, responses to the solicitation were not provided. | 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 solicitation documentation including request for proposals with required clauses and Buy American requirements are maintained along with responses to the solicitation. Additionally, please provide written assurance that all records will be maintained for 5 years.</i> |
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General Program Compliance: Civil Rights

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| 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 the release to. Showed where template release can be found on ADE's website at https://www.azed.gov/hns/nslp/forms/ . Discussed who would be responsible for doing this. | <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> |
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| <p>10 Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, complains alleging discrimination within the school meal programs are being handled internally (school principal and school board).</p> | <p>Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., SA, FNSRO, FNS Office of Civil Rights, or USDA Office of Civil Rights). The SFA's procedures must note whether an allegation is made verbally or in person. The SFA staff member receiving the allegation must transcribe the complaint. The SFA's procedures for receiving a complaint cannot prevent a complaint from being accepted. Additionally, the SFA's procedures must not indicate that they attempt to resolve the complaint themselves nor can the SFA's complaint process be a prerequisite for accepting a complaint. Additional guidance can be found on ADE's website at https://www.azed.gov/hns/civilrights. The Step-by-Step Instruction: How to File a Civil Rights Complaint can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.</p> | <p><i>Please provide a written description of the updated process and procedures for processing complaints alleging discrimination which meets requirements. Additionally, the certificate of completion of Step-by-Step Instruction: How to File a Civil Rights Complaint must be submitted.</i></p> |
| <p>11 Procedures were not in place for accomodating students with special dietary needs. 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 https://www.azed.gov/hns/nslp/forms under the Operational accordion. Additionally, referred to Accommodating Children with Disabilities in the School Meal Program found on ADE's website at https://www.azed.gov/hns/nslp 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 https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.</p> | <p><i>Please provide the template that will be made available to students with dietary needs that deviate from meal pattern requirements and written assurance that sufficient documentation to support accommodations for special diets will be maintained.</i></p> |

12 The current "And Justice for All" poster was not displayed in a prominent location and was not visible to all program participants. Specifically, an outdated version of the "And Justice for All" poster was posted.	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 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

Not applicable.

General Program Compliance: Local Wellness Policy

13 A Local Wellness Policy (LWP) has not been developed.	Discussed preliminary planning, such as who will be named as the designated LWP official and how required stakeholders will be invited to participate in the process. Reviewed handouts and discussed developing a LWP with required elements. Local Wellness Policy resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Local Wellness Policy accordion. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training accordion.	<i>Please provide a written plan for development of a Local Wellness Policy. This plan must include who will be designated as the oversight official, who will be invited to participate in the development process and the date by which the policy is expected to be completely developed and adopted. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.</i>
14 Potential stakeholders are not made aware of their ability to participate in the development, review, update, and implementation of the Local Wellness Policy. Specifically, parents, students, representatives of the school food authority, the school board, school administrators, general public, teachers of physical education, and/or school health professionals were not made aware of their ability to participate in the development, review, and update of the Local Wellness Policy.	Discussed feasible means of notifying potential stakeholders of their ability to participate. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training accordion.	<i>Please provide a written description of how all potential stakeholders, including parents, students, representatives of the school food authority, the school board, school administrators, general public, teachers of physical education, and/or school health professionals will be made aware of their ability to participate in the development, review, update, and implementation of the Local Wellness Policy.</i>

General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

15 The School Nutrition Program Director hired after July 1, 2015 did not complete the required 8 hours of food safety training within 30 days of being hired or within 5 years prior to hire date.	Discussed requirement and feasibility for attending an available certification training within current school year. Food Safety Online Training Library can be found on ICN's website at https://theicn.org/icn-resources-a-z/food-safety/ .	<i>School Nutrition Program Director completed 8 hours of food safety training on September 14, 2022. No further corrective action required.</i>
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16 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 or is planning to complete. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i>
17 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 or is planning to complete.</i>

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

18 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 a written description of steps that will be taken document 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

19 The benefit issuance document did not accurately reflect method of certification. Specifically, the agency by which eligibility was derived was not accurate for 1 student.	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

No findings.

Other Federal Program Reviews: Afterschool Snack Program

Not applicable.

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2024 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! Think Through Academy 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 | \$0 |
| <input checked="" type="checkbox"/> No- NSLP | <input type="checkbox"/> Yes- NSLP | \$0 |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by March 29, 2024 to Karen.Chingofor@azed.gov.

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
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