



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Hopi Day School

CTD: 09-91-01

Site: Hopi Day School

Contacts: TeJay Montgomery, Chief School Administrator and Dereka Pavinyama, Head Cook

Review Date: March 27, 2024

Review Period: February 2024

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
-----	--------------------------------	-------------------------------	----------------------------

Performance Standard 1: Certification and Benefit Issuance – Critical Area

No findings

Performance Standard 1: Meal Counting and Claiming – Critical Area

No findings

Performance Standard 2: Meal Components & Quantities – Critical Area

1	Fluid milk was not available in at least two varieties at breakfast on the day of review. This was determined to not be a repeat finding from previous cycle and did not contribute toward fiscal action calculations.	Discussed variety requirement and feasible options for compliance. Allowable milk varieties are fat-free unflavored, fat-free flavored and 1% unflavored. Please note that repeated violations involving milk requirements may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).	<i>Please provide one week of breakfast production records that demonstrate that fluid milk was available in at least two varieties. Additionally, please provide written assurance that fluid milk will always be available in at least two varieties at breakfast.</i>
---	--	---	--

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

No findings

Meal Access & Reimbursement: Certification and Benefit Issuance

No findings

Meal Access & Reimbursement: Verification

No findings

Meal Access & Reimbursement: Meal Counting and Claiming

No findings

Meal Pattern & Nutritional Quality: Offer Versus Serve

Not applicable

Meal Pattern & Nutritional Quality: Meal Components and Quantities

No findings

Resource Management

- | | | |
|--|--|---|
| <p>2 Meals served to teachers, administrators, custodians, and other adults were not priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals was sufficient to cover the overall cost of the meal.</p> | <p>Discussed ways to determine adult meal prices which included a per meal cost analysis and pricing utilizing the Adult Meal Pricing Tool. Non-Pricing Sites: pricing adult meals to reflect the amount of reimbursement received for a free meal plus the per meal value of entitlement and bonus commodities for non-pricing programs. Pricing Site: the paid meal price plus the amount of reimbursement received for a paid meal plus the per meal value of entitlement and bonus commodities for pricing programs. Referred to Adult Meal Pricing Tool SY 22-23 on ADE's website at https://www.azed.gov/hns/nslp/forms/ under the Financial accordion.</p> | <p><i>Please provide a written description of the steps which have been taken to increase adult meal prices and resolve the discrepancy, including the exact formula used to price adult meals. Additionally, please submit supporting documentation which reflects that prices have been increased to the appropriate level.</i></p> |
|--|--|---|

Procurement

- | | | |
|---|--|---|
| <p>3 The SFA did not provide documented procurement procedures.</p> | <p>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.</p> | <p><i>Please provide written procurement procedures that are consistent with 2 CFR 200.317 through 2 CFR 200.327.</i></p> |
|---|--|---|

- | | | |
|--|---|--|
| <p>4 Small purchase procedures were not in compliance with procurement requirements. Specifically, no solicitation, evaluation, or award documentation was provided for the following small purchases: Shamrock Foods.</p> | <p>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.</p> | <p><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></p> |
| <p>5 It was unable to be determined whether procurement was in compliance with the requirements for the appropriate threshold. Specifically, a vendors paid list was not provided to determine the amounts to paid to vendors in School Year 2022-2023</p> | <p>Discussed that when the value of the procurement for property or services under a Federal financial assistance award exceeds the Simplified Acquisition Threshold, or a lower threshold established by a non-Federal entity, formal procurement methods are required. Formal procurement methods (Invitations for Bid and Requests for Proposal) require following documented procedures and public advertising per 2 CFR 200.320(b).</p> | <p><i>Please provide a report showing all expenditures from the nonprofit school food service account from School Year 2022-2023 to support procurement methods used.</i></p> |

General Program Compliance: Civil Rights

6 Procedures for receiving and processing complaints alleging discrimination within the school meal programs are not in place.	Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., ADE, Food & Nutrition Services Southwest Regional Office, 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.	<i>Please provide a written description of the process and procedures for processing complaints alleging discrimination within FNS School Meal Programs. Additionally, the certificate of completion of Step-by-Step Instruction: How to File a Civil Rights Complaint must be submitted.</i>
--	---	---

General Program Compliance: SFA On-Site Monitoring

Not applicable

General Program Compliance: Local Wellness Policy

7 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.	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 https://www.azed.gov/hns/nslp/forms under the Local Wellness Policy accordion. Local Wellness Policy Assessment: Making it Meaningful 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 conducting an assessment of the implementation of the LWP. 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>
---	---	--

General Program Compliance: Competitive Food Services

Not applicable

General Program Compliance: Professional Standards

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

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 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 on completing the Administrative Review! Thank you for your hard work and cooperation during this process.

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 May 27, 2024 to Berenice Camacho Castaneda, Berenice.Camachocastaneda@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
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.