



# ARIZONA DEPARTMENT OF EDUCATION

## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Painted Desert Demonstration Projects, Inc.

CTD: 03-87-53

Site: STAR Charter School

Contacts: Andy LaFrate, Assistant Principal and Director of Operations

Robyn David, Food Service Manager

Review Date: May 14, 2024

Review Period: April, 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
<b>Performance Standard 1: Certification and Benefit Issuance – Critical Area</b>			
	Not Applicable.		
<b>Performance Standard 1: Meal Counting and Claiming – Critical Area</b>			
	No Findings.		
<b>Performance Standard 2: Meal Components &amp; Quantities – Critical Area</b>			
	No Findings.		
<b>Performance Standard 2: Dietary Specifications and Nutrient Analysis – Critical Area</b>			
	No Findings.		
<b>Meal Access &amp; Reimbursement: Certification and Benefit Issuance</b>			
	Not Applicable.		
<b>Meal Access &amp; Reimbursement: Verification</b>			
	Not Applicable.		

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

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| 1 | 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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No Findings.

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**Procurement**

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| 2 | The SFA did not provide written codes of conduct for procurement within the program. | Discussed that non-Federal entities must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award, and administration of contracts. | <i>Please provide written codes of conduct that are consistent with 2 CFR 200.318.</i> |
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| <p>3 The SFA did not take steps to assure that small, minority, and women's business enterprises and labor surplus firms are used when possible.</p>  | <p>Discussed that non-Federal entities must take all necessary affirmative steps to assure that minority businesses, women's businesses, and labor surplus area funds are used when possible. Affirmative steps must include: placing qualified small and minority businesses and women's business enterprises on solicitation list; assuring that small and minority businesses and women's business enterprises are solicited whenever they are potential sources; dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses and women's business enterprises; establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses and women's business enterprises; using services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and requiring the prime contractor, if subcontracts are to be let, to take these affirmative steps. Referred to 2 CFR 200.321.</p> | <p><i>Please provide written procurement procedures that include the affirmative steps that will be taken to ensure that minority businesses, women's businesses, and labor surplus area funds are used when possible.</i></p>  |
| <p>4 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: Shamrock Foods Company.</p>   | <p>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.</p>  | <p><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></p>   |
| <p>5 The SFA did not maintain records sufficient to detail the significant history of the procurement for formal purchases. Specifically, the 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: Shamrock Foods Company.</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 request for proposals with required clauses, Buy American requirements, and written method for conducting evaluations of proposals will be maintained for all formal purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.</i></p> |

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| 6 | 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: Shamrock Foods Company. | 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> |
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**General Program Compliance: Civil Rights**

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No Findings.

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**General Program Compliance: SFA On-Site Monitoring**

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No Findings.

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**General Program Compliance: Local Wellness Policy**

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No Findings.

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**General Program Compliance: Competitive Food Services**

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Not Applicable.

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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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No Findings.

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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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| 7 | The Afterschool Snack Program (ASP) monitoring review was not conducted within the first four weeks of operation and one additional time during the school year. | Discussed ASP monitoring requirements. A sample ASP monitoring form 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 Operational accordion. | <i>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.</i> |
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8 The Afterschool Snack Program (ASP) monitoring review conducted indicated that corrective action was required, but was never completed or implemented.

Discussed implementation of documented corrective action.

*Please provide the monitoring review forms that document that the corrective action was completed and implemented. Additionally, please provide written assurance that all correction action documented on the ASP monitoring form has been implemented.*

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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:**

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Thank you Painted Desert Demonstrations Projects, Inc. for completing the Administrative Review for school year 2023-2024! Continue working on trainings and planning delicious meals, the children loves them!

**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      \$0.00
- No- NSLP       Yes- NSLP      \$0.00

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **July 2, 2024** to [Danielle.Kirksey@azed.gov](mailto:Danielle.Kirksey@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.