



**ARIZONA DEPARTMENT OF
EDUCATION**

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Pan-American Elementary Charter

CTD: 07-89-40

Site: Pan-American Charter School

Contacts: Marta Pasos, Todd Wade, Adelita Garzon

Review Date: February 20, 2024

Review Period: January 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			

N/A

Performance Standard 1: Meal Counting and Claiming – Critical Area

1	Meal count totals by category for the month of review were not correctly combined and recorded. Specifically, 9,497 meals were claimed for SBP instead of the POS documented 2,397 meals. This was deemed a non-systemic error and 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.	<i>Please provide a written description of changes to the system that have been implemented to ensure that meal service lines provide an accurate count by eligibility category.</i>
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Performance Standard 2: Meal Components & Quantities – Critical Area

2	Quantities observed during the review period did not meet minimum amounts required by the lunch meal pattern. Specifically, SFA did not meet the minimum requirement of the red/orange subgroup, in the K-8 lunch meal pattern, during the week of review. SFA served 3/8 cup instead of the required 3/4 cup. This was determined to be a repeat finding from the previous cycle and 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 (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at http://www.azed.gov/hns/nslp under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).	<i>Please provide a written description of the changes that have been made to ensure that red/orange vegetable subgroup quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.</i>
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- 3 The following vegetable subgroup, Beans/Peas (Legumes) was not offered during the review period in the K-8 meal pattern. Discussed vegetable subgroup requirements for the age/grade groups served. vegetable Subgroup Quick Guide can be found on ADE's website at <https://www.azed.gov/hns/nslp/forms> under the Menu Planning accordion. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. Please note that repeated violations involving vegetable subgroups may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents). *Please provide one week of lunch production records which demonstrate compliance with the vegetable subgroups. Additionally, please provide written assurance that moving forward, all menus will be planned to meet the vegetable subgroup requirements.*
- 4 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, SFA did not meet the minimum requirement of the Dark Green subgroup, in the K-8 lunch meal pattern, during the week of review. SFA served 1/8 cup instead of the required 1/2 cup. Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the **National School Lunch Program** can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern accordion. **The Step-by-Step Instruction: How to Plan a Lunch Menu** can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents). *Please provide a written description of the changes that have been made to ensure that Dark Green vegetable subgroup quantities meet minimum amounts required by the meal pattern.*

- 5 Quantities observed during the review period did not meet minimum amounts required by the lunch meal pattern. Specifically, SFA did not meet the minimum requirement of the red/orange subgroup, in the 9-12 lunch meal pattern, during the week of review. SFA served 3/8 cup instead of the required 1 and 1/4 cup.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the **National School Lunch Program** can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern accordion. **The Step-by-Step Instruction: How to Plan a Lunch Menu** can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).
- Please provide a written description of the changes that have been made to ensure that red/orange vegetable subgroup quantities meet minimum amounts required by the meal pattern.*
- 6 The following vegetable subgroup, Beans/Peas (Legumes) was not offered during the review period in the 9-12 lunch meal pattern.
- Discussed vegetable subgroup requirements for the age/grade groups served. vegetable Subgroup Quick Guide can be found on ADE's website at <https://www.azed.gov/hns/nslp/forms> under the Menu Planning accordion. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. Please note that repeated violations involving vegetable subgroups may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).
- Please provide one week of lunch production records which demonstrate compliance with the vegetable subgroups. Additionally, please provide written assurance that moving forward, all menus will be planned to meet the vegetable subgroup requirements.*

- 7 Quantities observed during the review period did not meet minimum amounts required by the lunch meal pattern. Specifically, SFA did not meet the minimum requirement of the Dark Green subgroup, in the 9-12 lunch meal pattern, during the week of review. SFA served 1/8 cup instead of the required 1/2 cup.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the **National School Lunch Program** can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern accordion. **The Step-by-Step Instruction: How to Plan a Lunch Menu** can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).
- Please provide a written description of the changes that have been made to ensure that Dark Green vegetable subgroup quantities meet minimum amounts required by the meal pattern.*
- 8 Quantities observed during the review period did not meet minimum amounts required by the 9-12 meal pattern. Specifically, only 7/8 cup daily vegetable was served at lunch on January 25, 2024, instead of the required 1 cup.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the **National School Lunch Program** can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern accordion. **The Step-by-Step Instruction: How to Plan a Lunch Menu** can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).
- Please provide a written description of the changes that have been made to ensure that daily vegetable quantities meet minimum amounts required by the meal pattern.*

- 9 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, on January 23, 2024, SFA did not meet the minimum requirement of Meat/ Meat Alternate component, in the 9-12 lunch meal pattern, . SFA served 1.75 oz. eq. instead of the required 2.00 oz eq.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the **National School Lunch Program** can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern accordion. **The Step-by-Step Instruction: How to Plan a Lunch Menu** can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).
- Please provide a written description of the changes that have been made to ensure that Meat/ Meat Alternate quantities meet minimum amounts required by the meal pattern.*
- 10 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, on January 26, 2024, SFA did not meet the minimum requirement of Meat/ Meat Alternate component, in the 9-12 lunch meal pattern, . SFA served 1.25 oz. eq. instead of the required 2.00 oz. eq.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the **National School Lunch Program** can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern accordion. **The Step-by-Step Instruction: How to Plan a Lunch Menu** can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).
- Please provide a written description of the changes that have been made to ensure that Meat/ Meat Alternate quantities meet minimum amounts required by the meal pattern.*

- 11 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, on January 26, 2024, SFA did not meet the minimum requirement of grain component, in the 9-12 lunch meal pattern, . SFA served 1.00 oz. eq. instead of the required 2.00 oz. eq. Tostada shells used in recipe only credit 0.50 oz. eq. per shell.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the **National School Lunch Program** can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern accordion. **The Step-by-Step Instruction: How to Plan a Lunch Menu** can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).
- Please provide a written description of the changes that have been made to ensure that grain component quantities meet minimum amounts required by the meal pattern.*
- 12 Quantities observed on the day of review February 20, 2024, did not meet minimum amounts required by the breakfast K-12 meal pattern. Specifically, only 0.75 oz. eq. of grain was served, instead of the required 1.00 oz eq. A 6 oz. spoodle was used instead of the 8 oz. at the meal service.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. Meal pattern requirements for the **National School Breakfast Program** can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern accordion. **The Step-by-Step Instruction: How to Plan a Breakfast Menu** can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).
- Please provide a written description of the changes that have been made to ensure that grain quantities in the breakfast meal pattern meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.*

- 13 Quantities observed on the day of review February 20, 2024, did not meet minimum amounts required by the breakfast 9-12 meal pattern. Specifically, the minimum M/MA offered was below the 2 oz. eq requirement. This is a repeat finding from the previous cycle and 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 (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the **National School Lunch Program** can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern accordion. **The Step-by-Step Instruction: How to Plan a Lunch Menu** can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).
- Please provide a written description of the changes that have been made to ensure that Meat/ Meat Alternate quantities meet minimum amounts required by the meal pattern.*
- 14 Quantities observed on the day of review February 20, 2024, did not meet minimum amounts required by the breakfast 9-12 meal pattern. Specifically, the minimum Fruit offered was below the 1 cup requirement. This is a repeat finding from the previous cycle and 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 (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the **National School Lunch Program** can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern accordion. **The Step-by-Step Instruction: How to Plan a Lunch Menu** can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).
- Please provide a written description of the changes that have been made to ensure that daily fruit quantities meet minimum amounts required by the meal pattern.*

- 15 Quantities observed on the day of review February 20, 2024, did not meet minimum amounts required by the Lunch 9-12 meal pattern. Specifically, the minimum Vegetable offered was below the 1 cup requirement. This is a repeat finding from the previous cycle and 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 (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the **National School Lunch Program** can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern accordion. **The Step-by-Step Instruction: How to Plan a Lunch Menu** can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).
- Please provide a written description of the changes that have been made to ensure that daily vegetable quantities meet minimum amounts required by the meal pattern.*
- 16 Quantities observed on the day of review February 20, 2024, did not meet minimum amounts required by the Lunch 9-12 meal pattern. Specifically, the minimum grains offered was below the 2 oz eq. requirement. This is a repeat finding from the previous cycle and 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 (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the **National School Lunch Program** can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern accordion. **The Step-by-Step Instruction: How to Plan a Lunch Menu** can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).
- Please provide a written description of the changes that have been made to ensure that grain quantities in the lunch meal pattern meet minimum amounts required by the meal pattern.*

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

N/A

Meal Access & Reimbursement: Certification and Benefit Issuance

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| 17 Households are not notified of free meal benefits at the beginning of the school year per operating Special Assistance Provision 2. | Discussed requirement to notify families of program benefits and required content for notification. ADE Parent Letter template can be found on ADE's website at http://www.azed.gov/hns/nslp/forms under the Eligibility Documents for School Meal Benefits accordion. | <i>Please provide a copy of the parent letter that will be distributed to households at the beginning of each school year stating all students will receive free meal benefits. Additionally, please provide written assurance that households will be notified of program benefits according to requirements henceforth.</i> |
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Meal Access & Reimbursement: Verification

N/A

Meal Access & Reimbursement: Meal Counting and Claiming

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| 18 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 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>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> |
| 19 The approved CNPWeb Sponsor Application submitted by the SFA does not reflect current practices and procedures observed on-site. Specifically, a letter to parents detailing the operation of Special Provision Option 2 was not published. | Reviewed required content of parent letter and referred to USDA's Eligibility Manual for School Meals found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion. ADE Parent Letter template 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 the parent letter that includes language detailing the operation of Special Provision Option 2. Additionally, please provide written assurance that the parent letter will be distributed prior to or at the beginning of the school year.</i> |

Meal Pattern & Nutritional Quality: Offer Versus Serve

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| 20 Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast or lunch in buildings A or B. | Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. | <i>Please provide the sign that will be displayed to students that demonstrates what constitutes a reimbursable meal at Breakfast and Lunch for Building A and Building B. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i> |
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Meal Pattern & Nutritional Quality: Meal Components and Quantities

N/A

Resource Management

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| <p>21 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 (such as State or local fringe benefit or payroll funds, or funding from voluntary agencies) 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 accordon.</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> |
| <p>22 Sufficient documentation could not be provided to support charges to the nonprofit school food service account. In order for costs to be allowable they must be adequately documented as required in 2 CFR 200.403(g). Specifically, expenditures on general ledger Dulceria La Bonita \$212.37, Check 4519 \$318.99, Check 4563 \$475.85, and Check 4752 \$370.04.</p> <p>\$1,377.25 must be transferred back into the non-profit school foodservice account using non-federal funds.</p> | <p>Discussed cost allowability requirements for federal awards and that all costs charged to a federal award must be adequately documented. Referred to 2 CFR 200.403(g).</p> | <p><i>Please provide written procedures that will be implemented to ensure all costs charged to the nonprofit school foodservice account and any necessary supporting documentation are adequately documented and kept on file. Additionally, provide documentation to support the transfer of 1,377.25 back into the non-profit school foodservice account using non-federal funds.</i></p> |

Procurement

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| <p>23 Small purchase procedures were not in compliance with procurement requirements. Specifically, price or rate quotations were not obtained from an adequate number of qualified sources for the following small purchases: EMS LINQ and Pizza Mia.</p> | <p>Discussed that if small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources as determined appropriate by the non-Federal entity.</p> | <p><i>Please provide a written description of procurement procedures that will be followed prior to making a small purchase including the title of the individual within the SFA responsible for obtaining quotes for small purchases.</i></p> |
| <p>24 The SFA did not maintain records sufficient to detail the significant history of the procurement for small purchases. Specifically, insufficient evaluation and award documentation was maintained for the following small purchases: EMS LINQ and Pizza Mia.</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 of the evaluation and award will be maintained for all small purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.</i></p> |
| <p>25 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: EMS LINQ.</p> | <p>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.</p> | <p><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></p> |

26 The SFA did not maintain oversight to ensure that food purchases complied with the Buy American provision for the following small purchases: Pizza Mia.	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 of food products.</i>
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General Program Compliance: Civil Rights

27 The USDA nondiscrimination statement was not printed on appropriate program materials. Specifically the FFVP outreach material.	Discussed where to find nondiscrimination statement on ADE's website at https://www.azed.gov/hns/civilrights and whether long or short statement would be most appropriate.	<i>Please provide an updated FFVP outreach material with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i>
28 The USDA nondiscrimination statement was not printed on appropriate program materials. Specifically the Local Wellness Policy.	Discussed where to find nondiscrimination statement on ADE's website at https://www.azed.gov/hns/civilrights and whether long or short statement would be most appropriate.	<i>Please provide an updated Local Wellness Policy with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i>
29 The USDA nondiscrimination statement was not printed on appropriate program materials. Specifically the Breakfast Menu.	Discussed where to find nondiscrimination statement on ADE's website at https://www.azed.gov/hns/civilrights and whether long or short statement would be most appropriate.	<i>Please provide an updated Local Wellness Policy with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i>
30 Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, the SFA did not identify an outside agency to which complaints are forwarded and the SFA cannot prevent a complaint from being reviewed/investigated by a third party, and the SFA should not indicate attempts to resolve the complaints themselves.	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.	<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>

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| 31 | 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> |
| 32 | The "And Justice for All" poster was not displayed in a prominent location and was not visible to all program participants in Building B where 9-12 meals are served. | 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> |

General Program Compliance: SFA On-Site Monitoring

N/A

General Program Compliance: Local Wellness Policy

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| 33 | The public is not being notified of the existence and contents of the Local Wellness Policy (LWP). | Discussed feasible means of notifying the public about the LWP. Discussed submitting a media release, posting on community public bulletins and at local community centers. 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 the public will be notified of the existence and contents of the LWP.</i> |
| 34 | Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the Local Wellness Policy (LWP). Specifically, parents, students, the school board, general public, and school health professionals were not made aware of their ability to participate in the development, review, and update of the LWP. | Discussed feasible means of notifying potential stakeholders of their ability to participate. [Note any methods the SFA may have decided to employ] 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, the school board, general public, and school health professionals; will be made aware of their ability to participate in the development, review, update, and implementation of the LWP.</i> |

35 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>
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General Program Compliance: Competitive Food Services

N/A

General Program Compliance: Professional Standards

N/A

General Program Compliance: Water

N/A

General Program Compliance: Food Safety, Storage and Buy American

36 Temperature logs for food storage areas are not being maintained. Specifically a temperature log was not maintained for the walk-in freezer.	Discussed requirements for maintaining food storage area temperature logs, sample templates, and who would be responsible. Temperature logs for food storage areas must be maintained for 6 months. Monitoring forms can be 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>Please provide a copy of the temperature log that will be used for food storage areas as well as written assurance that logs will be kept daily and maintained on-file for 6 months.</i>
37 Storage violations were observed Specifically damaged produce boxes in the walk-in freezer.	Discussed specific violations and feasible solutions, such as adding shelving. 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>Please provide a written description of the changes that have been made to correct the storage violations found.</i>

38 Although a copy of the written food safety plan was on site, it was stored in the Manager's office and was not easily accessible during meal preparation and service.	Discussed that the written food safety plan should be easily available at each food preparation and food service site and that staff should be aware of its existence.	<i>Please provide written assurance that a copy of the written food safety plan has been made available in the meal service area.</i>
39 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: parmesan cheese used on 1/22 is a product of Lithuania and Uruguay and green chiles used on 1/25 are a product of Mexico, and Clementines used for FFVP on 2/20 are a 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 procurement and/or recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i>

General Program Compliance: Reporting and Recordkeeping

40 Production record is inaccurate. Specifically, on the day of review, all items served at lunch on February 20, 2024 were not included in the completed production record.	Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Crediting resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. ADE's training titled "Production Record Overview" can be located at https://www.azed.gov/hns/training	<i>Please provide a written description of changes made to ensure food items and crediting is correctly reflected on production records. Additionally, please provide the certificate of completion for the training: "Production Record Overview" on ADE's website.</i>
41 Records documenting the school systems Free and Reduced-Price Policy were not kept on file for the minimum required 5 years.	Discussed record keeping requirements and timeframe of 5 years.	<i>Please provide written assurance that all documents pertaining to the school meal programs will be retained on file for at least 5 years, as is required by Arizona law, as well as a written plan for ensuring that this requirement is met.</i>

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

42 Outreach to families regarding the availability of the School Breakfast Program (SBP) was not conducted at the beginning of the school year.	Discussed methods of notifying families of the availability of the SBP at the start of the school year. Additionally, discussed SBP outreach must include: serving times, locations where breakfast is available, and SBP costs.	<i>Please provide documentation that demonstrates how households are notified of the availability of the SBP at the beginning of the school year. Additionally, please provide a written description of how households will be notified of the availability of the SBP at the beginning of the school year and written assurance that this will occur.</i>
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43 Households were not notified of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year.	Discussed methods of notifying families of the availability of the SFSP prior to the end of the school year and determined which was most feasible. Summer feeding locations can be found at https://www.azhealthzone.org/ .	<i>Please provide a description of how households will be notified of the availability of the SFSP prior to the end of the school year and written assurance that this will occur. If you do not plan to operate the SFSP and no other entities reasonably close to your site operate the SFSP, please provide a description of other community resources that will be provided to households prior to the end of the school year.</i>
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Other Federal Program Reviews: Afterschool Snack Program

N/A

Other Federal Program Reviews: Seamless Summer Option

N/A

Other Federal Program Reviews: Fresh Fruit and Vegetable Program

44 Pan-American Charter School's cost documentation provided did not support the site's Fresh Fruit and vegetable Program (FFVP) claim for reimbursement. Specifically, sufficient documentation was not provided for the following claimed costs: \$3,166.59.	Discussed the requirement to maintain full and accurate FFVP records for a period of three years. This includes maintaining documentation of all program costs to support the submitted claim. Referred to USDA's Fresh Fruit and vegetable Program - A Handbook for Schools that can be found on FNS's website at https://www.fns.usda.gov/ffvp/ .	<i>Please provide a written description of the changes that have been made to the FFVP recordkeeping and claiming processes to ensure documentation supporting program costs is maintained. Additionally, provide written assurance that a completion report for FFVP Period 2 grant funding that indicates a return of funds in the amount of \$3,166.59.</i>
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Other Federal Program Reviews: Special Milk Program

N/A

Other Federal Program Reviews: At-Risk Afterschool Meals

N/A

Comments/Recommendations:

Thank you for your participation in the administrative review of the School Breakfast Program (SBP), National School Lunch Program (NSLP), and Fresh Fruit and Vegetable Program (FFVP) at Pan-American Elementary Charter. We commend Pan-American Charter School for its use of scratch and culturally relevant cooking methods, which not only enhance the nutritional value of meals but also promote program participation. However, it is important to address the findings identified during the review process, which encompass both critical and general areas of performance. The detailed report provided outlines these findings and includes recommendations for corrective action. We encourage prompt attention to these recommendations to ensure continued compliance and effectiveness of the programs. As a resource to aid in program compliance and improvement efforts, we recommend utilizing the Arizona Department of Education's (ADE) online training library <https://www.azed.gov/hns/nslp/training>. This library offers a wealth of resources, including training modules and webinars designed to support schools in meeting program requirements and enhancing operational efficiency. In conclusion, Pan-American Elementary Charter's dedication to providing nutritious meals to students and creating a supportive and inclusive school environment is appreciated. We are confident that with proactive measures and the utilization of available resources, Pan-American Elementary Charter will continue to promote student health and well-being.

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 type="checkbox"/> No- SBP	<input checked="" type="checkbox"/> Yes- SBP	-18,803.79
<input type="checkbox"/> No- NSLP	<input checked="" type="checkbox"/> Yes- NSLP	-9,103.55

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by May 7, 2024 to Ana Gandarilla at ana.gandarilla@azed.gov

Reviewer Signature

Date

Program Director 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

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