

# **Health and Nutrition Services Division**

# **Administrative Review Summary Report**

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	ool Food Authority Name: Concho Element	ary District	
	D: 01-03-06		
Site	: Concho Elementary School		
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	tacts: Billie Bell, District Administrator		
	Review Date: April 18, 2024		
	Review Period: March 2024		
	Programs Reviewed:   National Sch		✓ Afterschool Snack  At-Risk Afterschool Meals
NIa	Fresh Fruit & Veg	9	
No.	Review Observations & Findings	Technical Assistance Provided 1: Certification and Benefit Issuance	Required Corrective Action
	No Findings.	a 1: Certification and Benefit Issuance	e – Criticai Area
	No i indings.		
	Performance Stand	dard 1: Meal Counting and Claiming –	Critical Area
	No Findings.	<u> </u>	
	9		
	Performance Standa	ard 2: Meal Components & Quantities	– Critical Area
	Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, only 2 3/4 cup weekly vegetable was served during the week of review when 3 /34 cup is the minimum amount required to be served for the week. This was determined to be a systemic issue and a repeat finding from the previous cycle and contributed toward fiscal action calculations.	for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in recipes, etc.). Discussed with cafeteria staff how to properly identify and count	amounts required by the meal pattern.  Additionally, the certificate of completion of

2 Quantities observed during the review period did not meet minimum amounts required by the for this to happen and potential meal pattern. Specifically, only 1/4 cup daily vegetable was served on 3/4/2024, only 1/2 cup daily vegetable was served on 3/6/2024, and only daily vegetable was served on 3/7/2024 when a minimum of 3/4 cup is required to be served daily. This was determined to be a systemic issue and a repeat finding from the previous cycle and contributed toward fiscal action calculations.

Discussed how current system allowed Please provide a written description of the changes that could be made to ensure it doesn't continue (e.g., changes in 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 Lunch Program can be found on ADE's website at

http://www.azed.gov/hns/nslp under the Meal Pattern accordion. The Stepby-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 food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).

changes that have been made to ensure that daily vegetable quantities meet minimum amounts required by the meal pattern.

3 The following vegetable subgroups were not offered during the review period: dark green vegetables and beans/peas (legumes). This was not determined to be a repeat finding from the previous cycle and will not contribute toward at fiscal action calculations.

Discussed vegetable subgroup served. vegetable Subgroup Quick Guide can be found on ADE's website

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 performancebased reimbursement (extra 8 cents).

Please provide one week of lunch production requirements for the age/grade groups 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. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.

4 Portion sizes observed during the month of review did not meet minimum amounts required for this to happen and potential by the breakfast meal pattern. Specifically, on 3/5/2024, bread crediting as 0.75 ounce equivalents and on 3/8/2024, no grain item served crediting as 0 ounce equivalents were served with scrambled eggs with cheese crediting as 3 ounce equivalent and scrambled eggs crediting as 2.75 ounce equivalent. Meat/meat alternates may not be counted toward the grain component until after the minimum daily grains requirement (1.0 ounce equivalents) is offered.

Discussed how current system allowed Please provide one week of breakfast it doesn't continue (i.e., offering a grain that credits as at least 1.0 ounce equivalent). Discussed with cafeteria 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

https://www.azed.gov/hns/nslp under the Meal Pattern accordion. The Stepby-Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at

https://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).

production records which demonstrates that changes that could be made to ensure at least 1.0 equivalent of grains was offered prior to crediting Meat/Meat Alternates toward the grain component. Additionally, please provide a written description of the changes staff how to properly identify and count that have been made to ensure that at least 1.0 ounce equivalent of grain will be offered prior to crediting Meat/Meat Alternates toward the grain component. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Breakfast Menu must be submitted.

5 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the minimum daily meat/meat alternate quantities were not met on 3/8/2024. Only 0.25 oz eg meat/meat alternate was able to be credited due to lack of supporting crediting documentation. This was determined to be a repeat finding from the previous cycle and contributed toward fiscal action calculations.

for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in recipes, etc.). Discussed with cafeteria pattern. 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 Lunch Program can be found on ADE's website at

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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).

Discussed how current system allowed Please provide a written description of the changes that have been made to ensure that daily meat/meat alternate quantities meet minimum amounts required by the meal

6 Quantities observed during the review period did not meet minimum amounts required by the for this to happen and potential meal pattern. Specifically, the minimum weekly meat/meat alternate quantities were not met . Only 4.5 oz eq meat/meat alternate was served for the week, when 9 oz eq meat/meat alternate staff how to properly identify and count is required for the week. This was determined to reimbursable meals, as well as be a repeat finding from the previous cycle and contributed toward fiscal action calculations.

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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).

Discussed how current system allowed Please provide a written description of the changes that have been made to ensure that daily grain quantities meet minimum amounts required by the meal pattern.

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weekly meat/meat alternate quantities meet

minimum amounts required by the meal

pattern.

7 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the minimum daily grain quantities were not met on 3/8/2024. Only 0.25 oz eq grains was able to be credited due to lack of supporting crediting documentation. This was determined to be a repeat finding from the previous cycle and contributed toward fiscal action calculations.

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8 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the minimum weekly grain quantities were not met . Only 5.25 oz eq grains was served for the week, when 8 oz eq grains is required for the week. This was determined to be a repeat finding from the previous cycle and contributed toward fiscal action calculations.

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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).

Discussed how current system allowed Please provide a written description of the changes that have been made to ensure that weekly grain quantities meet minimum amounts required by the meal pattern.

	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

9 Daily edit checks are not being conducted appropriately. Specifically, the attendance factor checks using ADE's Daily Edit Check doesn't match the claim.

Discussed how to complete daily edit 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.

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

#### Meal Pattern & Nutritional Quality: Offer Versus Serve

Not Applicable.

# Meal Pattern & Nutritional Quality: Meal Components and Quantities

No Findings.

10 Indirect costs were incorrectly calculated. Specifically, Specifically, the calculation did not include the approved indirect cost rate being applies to an appropriate director cost base The charged consistently across the SFA allowable indirect cost base calculated by the SFA was \$19,160.

# Resource Management

Discussed proper classification of direct/indirect costs. Reviewed requirements that indirect costs be as required in 2 CFR 200.412-414. Referred to the USDA's Indirect Cost Guidance Manual located at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion, which can be used as a resource when determining allowable indirect costs.

Please provide the calculation or tool that will be used to determine the amount of indirect costs charged to the nonprofit school food service account. Additionally, please provide a written plan detailing the steps that will be taken to ensure indirect costs are calculated accurately. If required please also provide supporting documentation which reflects that any indirect costs charged in excess of the allowable rate have been returned to the nonprofit school food service account.

#### **Procurement**

No Findings.

17".

# **General Program Compliance: Civil Rights**

11 The public/media release was not provided to local media, the unemployment office and local employers considering large layoffs.

printed on appropriate program materials.

13 The "And Justice for All" poster displayed was

smaller than the USDA specified size of 11" by

Specifically, the Local Wellness Policy.

Discussed requirements and timeframe for public/media release, and best options locally for submitting release can be found on ADE's website at https://www.azed.gov/hns/nslp/forms/. Discussed who would be responsible

for doing this. 12 The USDA nondiscrimination statement was not 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.

Discussed USDA guidance states that the "And Justice for All" poster must not be printed on paper in a size smaller than 11 x 17 inches. Referred to HNS 08-2019 USDA

Nondiscrimination And Justice for All

Poster Clarification.

Please provide written procedures for distributing the public/media release and written assurance that the public/media the release to. Showed where template 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.

> Please provide an updated program material with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.

> Please provide written assurance that the "And Justice For All" poster will not be printed on paper in a size smaller than 11 x 17 inches.

General Program Compliance: SFA On-Site Monitoring

**General Program Compliance: Local Wellness Policy** 

14 The Local Wellness Policy (LWP) did not contain all required elements. Specifically, the LWP did not contain goals for nutrition promotion.

Discussed feasible options for nutrition None required at this time. promotion goals that can be written into the LWP. Discussed activity ideas which included offering contests, surveys, promotions and/or taste testing, providing information to families to encourage consumption of healthy foods at home, and displaying nutrition and health posters throughout campus. Team Nutrition Resources can be found at http://www.teamnutrition.usda.gov/. 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.

15 The Local Wellness Policy (LWP) did not contain all required elements. Specifically, the LWP did not contain nutrition standards for all foods and beverages provided, but not sold, to students on the school campus during the school day.

Discussed developing a LWP with nutrition standards for all foods and beverages provided, but not sold, to students. 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.

Discussed updating the LWP to

include policies that allow marketing

beverages that meet Smart Snacks

Standards during the school day.

Please provide a written plan for how nutrition standards for all foods and beverages provided to students on the school campus during the school day will be added to the LWP. The plan should include draft language of the element to be added, who will be involved in updating the LWP and the date the update is expected to be completed. Additionally, provide written assurance that the LWP will be specific to your institution.

16 The Local Wellness Policy (LWP) did not contain all required elements. Specifically, the LWP did not contain policies for food and beverage marketing.

> Explained that this requirement applies to exterior vending machines, posters, menu boards, coolers, trash cans and cups used for beverage dispensing. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Wehinar can be found on ADF's Discussed why the review and update is not occurring and what can be done to ensure this occurs as specified in the LWP. Discussed maintaining records to document compliance. 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.

Please provide a written plan for how n policies for food and beverage marketing will and advertising of only those foods and be added to the LWP. The plan should include draft language of the element to be added, who will be involved in updating the LWP and the date the update is expected to be completed. Additionally, provide written assurance that the LWP will be specific to vour institution.

> Please provide a written description of how the LWP will be reviewed and updated as well as how reviews and updates will be documented.

17 The review and update of the Local Wellness Policy (LWP), as specified in the policy itself, is not occurring nor is documentation being kept on file to support this.

18 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 Please provide a written plan for conducting assessment once every three years, at an assessment of the implementation of the 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, process, and the date by which the 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

LWP. This plan must include who will be

designated as the oversight official, who will

be invited to participate in the assessment

assessment is expected to be completed.

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.

	General Program Compliance: Competitive Food Services	
No Findings.		
G		
	General Program Compliance: Professional Standards	
No Findings.		
· ·		
	General Program Compliance: Water	
No Findings.		
5		
	General Program Compliance: Food Safety, Storage and Buy American	

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19 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: bananas. Additionally, documentation justifying a Buy American exception was not maintained/on file.

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.

Discussed the Buy American provision 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.

#### General Program Compliance: Reporting and Recordkeeping

- 20 Production record crediting is inaccurate. Specifically, pancakes served at breakfast on 3/4/2024 credited as 2 oz eq grains; however, the production record indicated it contained 2 oz records. Crediting resources can be eq M/MA and 2 oz eq grains.
- Discussed how to credit meal components and ensuring consistency with recipes, labels, and production found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion.

Please provide a production record that reflects the correct crediting information for pancakes. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.

- 21 Production record crediting is inaccurate. Specifically, toast served at breakfast on 3/5/2024 credited as 0.75 oz eq grains; however, the production record indicated it contained 2 oz eq M/MA.
- 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.

Please provide a production record that reflects the correct crediting information for toast. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.

- 22 Production record crediting is inaccurate. Specifically, potatoes served at breakfast on 3/8/2024 credited as 1/4 cup starchy vegetable; however, the production record indicated it contained 2 oz eq M/MA.
- 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.

Please provide a production record that reflects the correct crediting information for potatoes. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.

- 23 Production record crediting is inaccurate. Specifically, chips served at lunch on 3/7/2024 credited as 0 oz eg grain and 0 cups vegetable; however, the production record indicated it contained 2 oz eq grains and 1/2 cup vegetable. found on ADE's website at
- Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Crediting resources can be https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion.

Please provide a production record that reflects the correct crediting information for chips. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.

24 Production record crediting is inaccurate. Specifically, Bun served at lunch on 3/4/2024 credited as 2.5 oz eq grain; however, the production record indicated it contained 2 oz eq grains and 1 oz eq grain.

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.

Please provide a production record that reflects the correct crediting information for bun. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.

25 Production record crediting is inaccurate. Specifically, scrambled eggs served at breakfast on 3/5/2024 credited as 2.25 oz eq M/MA; however, the production record indicated records. Crediting resources can be it contained 2 oz eq M/MA.

Discussed how to credit meal components and ensuring consistency with recipes, labels, and production found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion.

Please provide a production record that reflects the correct crediting information for scrambled eggs. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.

26 Production record crediting is inaccurate. Specifically, cheese slice served at breakfast on components and ensuring consistency 3/5/2024 and 3/8/2024 credited as 0.75 oz eq M/MA; however, the production record indicated records. Crediting resources can be it contained 1 oz eq M/MA.

Discussed how to credit meal with recipes, labels, and production found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion.

Please provide a production record that reflects the correct crediting information for cheese slice. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.

27 Production record crediting is inaccurate. Specifically, brown rice served at lunch on 3/6/2024 credited as 1.25 oz eq grain; however, with recipes, labels, and production the production record indicated it contained 2 oz records. Crediting resources can be eq grains and 3 oz eq grain.

Discussed how to credit meal components and ensuring consistency found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion.

Please provide a production record that reflects the correct crediting information for brown rice. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.

28 Production record crediting is inaccurate. Specifically, PB&J served at lunch on 3/7/2024 credited as 1 oz eq M/MA; however, the production record indicated it contained 2 oz eq records. Crediting resources can be grains and 1 oz eq M/MA.

Discussed how to credit meal components and ensuring consistency with recipes, labels, and production found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion.

Please provide a production record that reflects the correct crediting information for PB&J. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.

29 Published menu does not accurately reflect what is being served. Specifically, on 3/5/2024 breakfast menu it states a muffin was served, but toast was served instead. This substitution is acceptable.

Discussed that although menus are subject to change, the menu should not list options that the SFA knows will not be offered.

Please provide a breakfast menu and 5 days of breakfast production records to support the breakfast menu.

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

30 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. Discussed other resources within the local area to provide families regarding meals during the summer months when school is not in session. Summer feeding locations can be found at https://www.azhealthzone.org/.

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(s) 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.

# Other Federal Program Reviews: Afterschool Snack Program

32 The Afterschool Snack Program (ASP) monitoring review was not conducted within the requirements. A sample ASP first four weeks of operation and one additional time during the school year.

Discussed ASP monitoring monitoring form can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational accordion.

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.

# Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2024 if applicable.

## Other Federal Program Reviews: Fresh Fruit and Vegetable Program

33 Concho Elementary School is not on track to spend no more than 10% of its total grant on administrative costs. Specifically, Concho Elementary School has spent 21.81% of its total Fruit and Vegetable Program. grant on administrative costs year-to-date.

exceed 10% of the total grant. Referred to Orientation to the Fresh

Discussed administrative costs cannot Please provide a written plan to ensure that administrative costs will not exceed 10% of the total grant this program year at Concho Elementary School.

# Other Federal Program Reviews: Special Milk Program

Not Applicable.

# Other Federal Program Reviews: At-Risk Afterschool Meals

Not Applicable.

# Comments/Recommendations:

Congratulations, Concho Elementary District has successfully completed the Administrative Review for the 2023-2024 school year. Thank you for your cooperation during the review process. Please remember that we have a variety of trainings (in-person and online) to assist you and your staff in operating a successful National School Lunch Program.

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.

Fiscal Action	Assessed?				
	✓ No- SBP	Yes- SBP	\$0.00		
	No- NSLP	✓ Yes- NSLP	\$5,737.65		
Fiscal Action	under \$600 wil	l be disregarde	d.		
Please submi	it corrective act	ion response b	y June 17, 2024 to Me	gan Lynch at Megan.Lynch@azed.gov.	
Reviewer Sig	nature	Date	=	Program Director Signature	Date

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.

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the <a href="School Food Authority Appeal Procedure for the Administrative Review">School Food Authority Appeal Procedure for the Administrative Review</a> 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.