



# ARIZONA DEPARTMENT OF EDUCATION

## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Round Valley Unified District  
CTD: 01-02-10  
Site: Round Valley Middle School

Contacts: Slade Morgan, Superintendent  
Joseph Stoiber, Food Director

Review Date: April 17, 2024  
Review Period: March 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 |
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#### Performance Standard 1: Certification and Benefit Issuance – Critical Area

No Findings.

#### Performance Standard 1: Meal Counting and Claiming – Critical Area

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| 1 | Meal service lines observed on the day of review did not provide an accurate count by eligibility category at the point of service. Specifically, during breakfast on the day of review POS lines were not set up to obtain an accurate count. This is deemed to be non-systemic and will not contribute toward fiscal action. | Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. Discussed with staff how to properly identify and count reimbursable meals, as well as counting based on eligibility category. | <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

No Findings.

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

No Findings.

#### Meal Access & Reimbursement: Certification and Benefit Issuance

No Findings.

#### Meal Access & Reimbursement: Verification

No Findings.

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

No Findings.

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

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| 2 Offer versus Serve (OVS) was not implemented properly. Specifically, students were not given the option to decline component. Specifically, students were not given the option to decline milk during lunch service. | Provided technical assistance on proper implementation of OVS and discussed with kitchen and point of service staff. Reviewed menu and discussed options for a reimbursable meal under OVS. USDA's Offer Versus Serve Manual, Effective beginning School Year 2015-2016 can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals accordion. | <i>Please provide a written description demonstrating how OVS will be implemented properly. Additionally, please provide written assurance that moving forward, OVS will be implemented properly.</i> |
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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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| 3 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. | 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 <a href="https://www.azed.gov/hns/nslp/forms/">https://www.azed.gov/hns/nslp/forms/</a> under the Financial accordion. | <i>Corrected during the review. Adult meal prices have been updated using the Adult Meal Pricing Tool. No further corrective action necessary.</i> |
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**Procurement**

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| 4 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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| 5 | The SFA did not maintain records sufficient to detail the procurement for micro purchases. Specifically, no documentation was provided for the following micro purchases: Lowes Home Improvement.  | 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 and receipts/invoices for purchases made with Federal funds.   | <i>Please provide a written description of procurement procedures that will be implemented to ensure that sufficient records will be maintained for all micro purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.</i>   |
| 6 | 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: Aspin and Woodland building.              | 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.  | <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>  |
| 7 | Small purchase procedures were not in compliance with procurement requirements. Specifically, no solicitation, evaluation, or award documentation was provided for the following small purchases: Aspin and Woodland building.                                     | Discussed that all procurement transactions for the acquisition of property or services required under a Federal award must be conducted in a manner providing full and open competition consistent with the standards of this 2 CFR 200.319 and 2 CFR 200.320. Additionally discussed that non-Federal entities must have written procedures for procurement transactions. These procedures must ensure that all solicitations incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. | <i>Please provide a written description of solicitation, evaluation, and award procedures that will be followed prior to making a small purchase including the title of the individual within the SFA responsible for conducting the solicitation for all small purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.</i> |
| 8 | 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: Aspin and Woodland Building. | Discussed that non-Federal entities must maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to, the following: Rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.  | <i>Please provide a written description of procurement procedures that will be implemented to ensure that sufficient records 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>   |
| 9 | 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:Aspin and Woodland building.                          | 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 the processes implemented to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.</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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| 10 | 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Local Wellness Policy accordion. Local Wellness Policy Assessment: Making it Meaningful Webinar 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 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**

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No findings.

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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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Not applicable.

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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:**

Congratulations Round Valley Unified District for successfully completing the Administrative Review for school year 2023-2024! Always keep up to date with the latest news and training that can be found on ADE's website. Thank you for providing the hospitality you did, it was appreciated.

**To stay on track with NSLP requirements, check out the NSLP at a Glance Calendar & Monthly Checklist on our website at <https://www.azed.gov/hns/nslp/forms> under the Calendars and Checklists tab.**

**Training: In-person classes, web-based training, and how-to guides can be found on ADE's website at <https://www.azed.gov/hns/nslp/training>.**

**Fiscal Action Assessed?**

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| <input checked="" type="checkbox"/> No- SBP  | <input type="checkbox"/> Yes- SBP  | \$0.00 |
| <input checked="" type="checkbox"/> No- NSLP | <input type="checkbox"/> Yes- NSLP | \$0.00 |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **July 15, 2024** to Danielle Kirksey at [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

Tom Hirono, Superintendent of Public Instruction  
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“We are a service organization committed to raising academic outcomes and empowering parents.”

This institution is an equal opportunity provider.