



# ARIZONA DEPARTMENT OF EDUCATION

## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Toltec School District

CTD: 11-04-22

Site: Toltec Elementary School

Contacts: Denise Rogers, Superintendent, Damaris Sites Director of Finance and Haydee Gutierrez, Food Service Director

Review Date: February 15, 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
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**Performance Standard 1: Certification and Benefit Issuance – Critical Area**

No findings.

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

No findings.

**Performance Standard 2: Meal Components & Quantities – Critical Area**

<p>1 During the week of review, at least 80% of grains served at lunch were not whole grain-rich. This did not contribute to fiscal action calculation</p>	<p>Discussed whole grain-rich requirements. USDA's Whole Grain Resource for the National School Lunch and Breakfast Programs: A Guide to Meeting the Whole Grain-Rich Criteria 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 Menu Planning accordion.</p>	<p><i>Please provide one week of lunch production records and supporting documentation (CN Label, PFS, ingredient lists, Nutrition Facts labels, etc.) that demonstrate at least 80% of grains served at [lunch] were whole grain-rich.</i></p>
<p>2 The following vegetable subgroup(s) was/were not offered during the review period: Red/Orange and Beans/Peas(legumes). This was determined to be a repeat finding from the previous cycle and contributed toward fiscal action calculations.</p>	<p>Discussed vegetable subgroup requirements for the age/grade groups served. vegetable Subgroup Quick Guide 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 Menu Planning accordion. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion. Please note that repeated violations involving vegetable subgroups may result in fiscal action.</p>	<p><i>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. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.</i></p>

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

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No findings.

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

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No findings.

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**Meal Access & Reimbursement: Verification**

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No findings.

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

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| 3 | Meals counted for reimbursement during a field trip are not served through an adequate point of service.   | Discussed potential procedures that will be implemented, as well as who would be responsible.   | <i>Please provide a written description of procedures that have been implemented to ensure that meals served during field trips are counted through an adequate point of service.</i>  |
| 4 | Daily edit checks are not being conducted appropriately. Specifically, the attendance factor on the daily edit check does not match the attendance factor on the monthly reimbursement claims. | Discussed how to complete daily edit checks using ADE's Daily Edit Check worksheet. The Daily Edit Check Worksheet can be found on ADE's website <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational accordion. The Step-by-Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion. | <i>Please provide a completed daily edit check worksheet for the most recently submitted claim month. Additionally, please provide written assurance that daily edit checks will be conducted. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete Daily Edit Checks must be submitted.</i> |

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

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| 5 | Signage which explains what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable was not displayed to students at breakfast | Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage 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 Menu Planning accordion. | <i>Correction was made during on-site review. No further action needed.</i> |
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**Meal Pattern & Nutritional Quality: Meal Components and Quantities**

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No finding.

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**Resource Management**

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No finding.

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**Procurement**

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No finding.

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**General Program Compliance: Civil Rights**

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| 6 | The USDA nondiscrimination statement was not printed on appropriate program materials. Specifically, SFA website posted CEP eligibility information, and did not include the required non-discrimination statement. | Discussed where to find nondiscrimination statement on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> and whether long or short statement would be most appropriate.  | <i>Correction has been made during on-site review. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i>   |
| 7 | 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. Showed where template release 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> . 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> |

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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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| 8 | The Local Wellness Policy (LWP) did not contain all required elements. Specifically, the LWP did not contain a description of public involvement, public updates, policy leadership, and/or evaluation plan.  | Discussed that local wellness policies are required to include a description of public involvement, public updates, policy leadership, and evaluation plan. The Local Wellness Policy Final Rule: Guidance and Tools From ADE 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 how a description of public involvement, public updates, policy leadership, and evaluation plan 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.</i> |
| 9 | The required stakeholders are not being permitted to be involved in the development, review, and update of the Local Wellness Policy (LWP). Specifically, parents, students and the general public were not permitted to participate in the development, review, and update of the LWP. | Discussed LEAs must permit participation by the general public and school community (including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators) in the wellness policy process. Guidance on assembling a Local Wellness Policy Team can be found on Team Nutrition's website at <a href="https://www.theicn.org/cnss/community-connection/assembling-the-team/">https://www.theicn.org/cnss/community-connection/assembling-the-team/</a> . The Local Wellness Policy Final Rule: Guidance and Tools From ADE 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 description of how all stakeholders, including parents, students and the general public will be permitted to be involved in the development, review, and update of the LWP.</i>  |

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| 10 | 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, and the general public 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 <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 description of how all potential stakeholders, including parents, students, and the general public, will be made aware of their ability to participate in the development, review, update, and implementation of the LWP.</i>  |
| 11 | 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> |
| 12 | A plan is not in place to notify the public of the results of the most recent assessment of the implementation of the Local Wellness Policy (LWP), when assessment is conducted.   | Discussed requirement to make the most recent assessment available to the public. Also discussed feasible means for notifying the public of the results of the most recent assessment on the implementation of the LWP. The USDA's Local Wellness Policy Outreach Toolkit can be found at <a href="https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit/">https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit/</a> .   | <i>Please provide a written plan for how the public will be notified of the results of the most recent assessment of the implementation of the LWP.</i>  |

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**General Program Compliance: Competitive Food Services**

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Not applicable.

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**General Program Compliance: Professional Standards**

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| 13 | The School Nutrition Program Director hired after July 1, 2015 did not complete the required 8 hours of food safety training within 30 days of being hired or within 5 years prior to hire date. | Discussed requirement and feasibility for attending an available certification training within current school year. Food Safety Online Training Library can be found on ICN's website at <a href="https://theicn.org/icn-resources-a-z/food-safety/">https://theicn.org/icn-resources-a-z/food-safety/</a> . | <i>Food safety training has been completed. No further action needed.</i> |
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- 14 The School Nutrition Program Director did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed. Discussed 12 hour requirement and feasibility for attending upcoming applicable trainings. Training Curriculum for Arizona Child Nutrition Professionals Operating the National School Lunch and School Breakfast Program can be found on ADE's website at <https://www.azed.gov/hns/nslp/training> under the Build Your Employees Training Plans accordion. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <https://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. *Please provide the expected date that the training requirement will be met as well as the name, date and content information of trainings that the School Nutrition Program Director is registered for. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.*
- 15 Full-time School Nutrition Program staff have not met the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed. Discussed 6 hour training requirement and feasibility for attending upcoming applicable trainings. Training Curriculum for Arizona Child Nutrition Professionals Operating the National School Lunch and School Breakfast Program can be found on ADE's website at <https://www.azed.gov/hns/nslp/training> under the Build Your Employees Training Plans accordion. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <https://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. *Please provide the expected date that the training requirement will be met as well as the name, date and content information of trainings that full-time School Nutrition Program staff are registered for. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.*
- 16 Part-time School Nutrition Program staff have not met the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed. Discussed 4 hour training requirement and feasibility for attending upcoming applicable trainings. Training Curriculum for Arizona Child Nutrition Professionals Operating the National School Lunch and School Breakfast Program can be found on ADE's website at <https://www.azed.gov/hns/nslp/training> under the Build Your Employees Training Plans accordion. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <https://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. *Please provide the expected date that the training requirement will be met as well as the name, date and content information of trainings that Part-time School Nutrition Program staff are registered for.*

17 Professional Standards training hours are not being adequately tracked. Specifically, SFA is not providing the training code.	Referred to USDA's Professional Standards Training Tracker Tool and discussed requirements for tracking. Referred to ADE's Training Tracking forms 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 Professional Standards accordion. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion.	<i>Please provide the tracker that will be used to track Professional Standards training hours on an annual basis for all School Nutrition Program staff. Additionally, please provide written assurance that Professional Standards training code will be provided on training tracker for all School Nutrition Program staff on an annual basis. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i>
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**General Program Compliance: Water**

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No finding.

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**General Program Compliance: Food Safety, Storage and Buy American**

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18 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools for Frozen California Vegetable frozen, (Product of Mexico) and Fajita Vegetable Blend, product of China. 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational accordion. Buy American Recorded Webinar and FAQ can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion.	<i>Correction was made during on-site review. No further action needed.</i>
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**General Program Compliance: Reporting and Recordkeeping**

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19 Production records for breakfast and lunch did not contain all required sections: Specifically, the total reimbursable meals served.	Discussed required sections of production records. Production Record Templates 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 Menu Planning accordion. The Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion.	<i>Please provide copies of completed breakfast and lunch production records for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years. Additionally, the certificate of completion of Production Record Overview must be provided.</i>
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**General Program Compliance: School Breakfast Program and Summer Food Service Program Outreach**

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No finding.



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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! has completed the Administrative Review for the 2023-2024 school year. Thank you for your hospitality during the review process. You are doing an outstanding job implementing the NSLP. It is evident that you are working hard to ensure your students are fed healthy meals.

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

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

**Fiscal Action Assessed?**

No- SBP       Yes- SBP      \$0.00  
 No- NSLP       Yes- NSLP      5,633.65

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **April 25, 2024** to Amy Dixon Banire at [Amy.DixonBanire@azed.gov](mailto:Amy.DixonBanire@azed.gov).

**Amy Banire**

Digitally signed by Amy Banire  
Date: 2024.03.26 12:39:34  
-07'00'

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Reviewer Signature

Date

**Brandon Estrada**

Digitally signed by  
Brandon Estrada  
Date: 2024.03.26  
12:36:32 -07'00'

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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](http://www.azed.gov)  
"We are a service organization committed to raising academic outcomes and empowering parents."

This institution is an equal opportunity provider.