



# ARIZONA DEPARTMENT OF EDUCATION

## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Black Mesa Community School  
CTD: 09-39-01  
Site: Black Mesa Community School

Contacts: Marie Rose, Principal and Marlene Bitlah

Review Date: March 21, 2024

Review Period: February 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

1	Meals counted for reimbursement during a field trip are not served through an adequate point of service. Specifically, meals provided for field trips are counted prior to the students receiving the meals.	Discussed potential procedures that will be implemented (such as sending a meal count roster for teachers to complete during meal service) 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>
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#### Performance Standard 2: Meal Components & Quantities – Critical Area

2	During the week of review, at least 80% of grains served at lunch were not whole grain-rich. Specifically, only 72.22% of grains served during February 5–9, 2024 were whole grain-rich.	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.	<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>
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#### Performance Standard 2: Dietary Specifications and Nutrient Analysis – Critical Area

No Findings.

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

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| <p>3 Direct certification matches were not conducted according to the proper time frames, which for CEP schools is once per year on or around April 1. Specifically, direct certification was run on April 17, 2023.</p> | <p>Referred to Direct Certification for Assistance Programs section in USDA's Eligibility Manual for School Meals 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. Additionally, used school calendar to plot timeframes for running reports. The NSLP At A Glance Calendar and The Monthly Checklist for School Food Authorities 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 Calendar and Checklists accordion.</p> | <p><i>Please provide a written description of the changes that have been implemented to ensure direct certification will be conducted according to the proper time frames. Additionally, please provide written assurance that, moving forward, direct certification will be run according to the prescribed timeframes for all students enrolled.</i></p> |
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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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No Findings.

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

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Not Applicable.

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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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| <p>4 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. Specifically, adult breakfasts were \$2.50 and adult lunches were \$3.50.</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. 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.</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 or documentation showing non-Federal funds covering the difference between charged price and the required price.</i></p> |
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| 5 | 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. Specifically, nonprogram adults were observed receiving meals free of charge. | Discussed that an adult who is not directly involved in the operation and administration of the School Nutrition Programs is considered a "nonprogram adult." Nonprogram adults may include, but are not limited to, school administrators, custodians, and teachers. Nonprogram adult meals must be priced at an amount sufficient to cover the overall cost of the meal, including the value of donated foods (USDA Foods) used in the production of these meals. These meals are classified and recorded as adult meals. Non-program adult meals may not be paid for or subsidized with funds from the nonprofit school food service account 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>Please provide a written description of the steps which have been taken to ensure that all nonprogram adults, including teachers supervising students during meal periods, are charged appropriately for meals or documentation showing non-Federal funds are being used to cover the cost of providing meals to nonprogram adults.</i> |
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**Procurement**

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| 6 | The SFA did not publicly advertise a Request for Proposals for the following goods/services: Food distribution and supplies.   | Discussed that formal procurement methods are required when the value of the procurement for property or services under a Federal financial assistance award exceeds the Simple Acquisition Threshold. Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Referred to 2 CFR 200.320(b)(2)(i).  | <i>Please provide a written description of the procurement procedures that will be implemented for publicizing solicitations for all requests for proposals. Additionally, please provide written assurance that all records will be maintained for 5 years.</i>                     |
| 7 | The SFA did not perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold. Specifically, a cost or price analysis was not conducted for the following goods/services: Food distribution and supplies. | Discussed that a cost or price analysis must be performed for every procurement action in excess of the Simplified Acquisition Threshold, including contract modifications, before receiving bids or proposals. A price analysis will be used to determine the reasonableness of the proposed contract price.  | <i>Please provide a written description of the procurement procedures that will be implemented for conducting the cost or price analysis prior to any formal procurement action. Additionally, please provide written assurance that all records will be maintained for 5 years.</i> |
| 8 | The SFA did not take steps to assure that small, minority, and women's business enterprises and labor surplus firms are used when possible.  | Discussed that non-Federal entities must take all necessary affirmative steps to assure that minority businesses, women's businesses, and labor surplus area funds are used when possible. Affirmative steps must include: placing qualified small and minority businesses and women's business enterprises on solicitation list; assuring that small and minority businesses and women's business enterprises are solicited whenever they are potential sources. Referred to 2 CFR 200.321. | <i>Please provide written procurement procedures that include the affirmative steps that will be taken to ensure that minority businesses, women's businesses, and labor surplus area funds are used when possible.</i>  |

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**General Program Compliance: Civil Rights**

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| 9  | 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 <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> |
| 10 | The most current "And Justice for All" poster was not displayed in a prominent location and was not visible to all program participants.                        | Discussed requirements of where poster must be placed and where to find a printable "And Justice For All" poster on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> . Referred to HNS 08-2019 USDA Nondiscrimination And Justice for All Poster Clarification.            | <i>The current "And Justice for All" poster was displayed in a prominent location visible to all program participants during the on-site review. No further corrective action required.</i>  |
| 11 | Program staff have not been trained on civil rights topics. Specifically, the director has not been trained on civil rights topics in the current program year. | Discussed requirement and how to document that requirement has been met. An acceptable civil rights power point training material can be found on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> .   | <i>Please provide written assurance that all food service staff will be trained at hire and as needed on Civil Rights Compliance in Child Nutrition Programs. Describe the process that will be implemented to ensure that this requirement is adhered to and properly documented.</i>     |

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

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*Not applicable.*

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**General Program Compliance: Local Wellness Policy**

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| 12 | 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. 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 the public will be notified of the existence and contents of the LWP.</i>   |
| 13 | 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, representatives of the school food authority, the school board, school administrators, general public, teachers of physical education, and/or 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. 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, representatives of the school food authority, the school board, school administrators, general public, teachers of physical education, and/or school health professionals, will be made aware of their ability to participate in the development, review, update, and implementation of the LWP.</i> |

14 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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*Not Applicable.*

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**General Program Compliance: Professional Standards**

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15 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> 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 <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 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.</i>
16 The School Nutrition Program Manager did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.	Discussed 10 hour training requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals 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>	<i>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 Manager is registered for.</i>

17 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a>	<i>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.</i>
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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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18 Temperature logs for food storage areas are not being maintained. Specifically, dry storage temperatures were not consistently completed each operating day.	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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Food/Health Safety accordion. Additionally, discussed Food Safety Online Training Library can be found on ICN's website at <a href="https://theicn.org/icn-resources-az/food-safety/">https://theicn.org/icn-resources-az/food-safety/</a> .	<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>
19 The most recent food safety inspection report was not posted in a prominent location and was not visible to all program participants.	Discussed making copies of most recent report and feasible places for posting.	<i>Please provide a photo demonstrating that the most recent food safety inspection report has been posted in a location where the program participants can view it. Additionally, please specify where the report has been posted.</i>
20 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed school: Bountiful Harvest Pineapples (origin of Thailand), Jalapeno Peppers (product of Mexico), Bountiful Harvest Tropical Fruit Salad (origin of Thailand), and Bountiful Harvest Broccoli Cuts (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 <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>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>

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**General Program Compliance: Reporting and Recordkeeping**

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| 21 Production record crediting is inaccurate. Specifically, French Toast served at breakfast on February 9, 2024 credited as 2.0 oz eq grain; however, the production record indicated it contained 1.0 oz eq meat/meat alternate and 1.0 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning accordion.  | <i>Please provide a production record that reflects the correct crediting information for French Toast. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on production records.</i> |
| 22 Production record crediting is inaccurate. Specifically, 1/4 cup celery served at lunch on February 6, 2024 credited as 1/4 cup of vegetable; however, the production record indicated that it credited as 1/2 cup vegetable.  | 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning accordion.  | <i>Please provide a production record that reflects the correct crediting information for 1/4 cup Celery .</i>   |
| 23 Production record crediting is inaccurate. Specifically, the burrito served at lunch on February 7, 2024 credited as 2.0 oz eq meat/meat alternate, 2.5 oz eq grain, and 0 cup vegetable; however, the production record stated burrito served credited as 2.0 oz eq meat/meat alternate, 1.5 oz eq grain, and 1/4 cup red/orange vegetable. | 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning accordion.  | <i>Please provide a production record that reflects the correct crediting information for Bean and Cheese Burrito.</i>   |
| 24 Production record crediting is inaccurate. Specifically, 1/2 cup Mixed Vegetables served at lunch on February 9, 2024 credited as 1/2 cup other vegetable; however, the production record stated that it credited as 1/8 cup dark green vegetable, 1/8 cup red/orange vegetable, and 1/8 cup starchy vegetable.                              | 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning accordion.  | <i>Please provide a production record that reflects the correct crediting information for 1/2 cup Mixed Vegetables .</i>   |
| 25 Production records and menu does not accurately reflect what is being served. Specifically, the production record and menu for February 7, 2024 indicated that a Beef Burrito was served; however, invoices supported that a Bean & Cheese Burrito was actually 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 a written description of the changes that have been implemented to ensure that production records and menus accurately reflect what is being served.</i>   |

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

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| 26 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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**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! Black Mesa Community School has completed the administrative review for the 2023-2024 school year. Thank you for your hospitality and organization during the review process. It is evident that you are working hard to ensure your students are fed healthy meals in a welcoming environment.

**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  | [Amount] \$0 |
| <input checked="" type="checkbox"/> No- NSLP | <input type="checkbox"/> Yes- NSLP | [Amount] \$0 |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **May 10, 2024** to Karen Chingofor and or [Karen.Chingofor@azed.gov](mailto:Karen.Chingofor@azed.gov).

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Reviewer Signature

Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the [School Food Authority Appeal Procedure for the Administrative Review](#) found under the Reviews Conducted by the State Agency accordion on ADE's National School Lunch and School Breakfast Program webpage.

Tom Horne, Superintendent of Public Instruction  
1535 West Jefferson Street • Phoenix Arizona 85007 • [www.azed.gov](http://www.azed.gov)

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