



# ARIZONA DEPARTMENT OF EDUCATION

## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Devereux Arizona

CTD: 07-21-02

Site: Devereux Arizona - Sweetwater Campus

Contacts: Yvette Jackson, Executive Director; Sunshine Turner, Asst. Executive Director

Review Date: December 12, 2024

Exit Conference Date: December 12, 2024

Review Period: November 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	Meal count totals were not correctly combined and recorded at lunch during the review period. This was deemed a non-systemic error and contributed toward fiscal action calculations.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue.	<i>Please provide a written description of changes to the system that have been implemented to ensure that meal count totals are correctly combined and recorded, including the date of implementation.</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 breakfast were not whole grain-rich. Specifically, only 67.06% of grains served at breakfast during November 3-9, 2024 were whole grain-rich.	Discussed requirement for at least 80% of grains served to be whole grain-rich, how to identify whole grain-rich items, and potential changes to the menu to increase whole grain-rich percentage. 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 breakfast production records and supporting documentation (e.g., Child Nutrition label, Product Formulation Statement, ingredient lists, Nutrition Facts labels, etc.) that demonstrate at least 80% of grains served at breakfast were whole grain-rich.</i>
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- 3 The following products could not be credited towards the meal pattern due to insufficient documentation: Riverhill Poultry Originals Chicken Breast, Gold Kist Farms Chicken Fajita Strip, Packer Label Chicken Drumstick, Turkey Breast. Without sufficient documentation, the reviewer was unable to determine if meat/meat alternate quantity requirements were met at lunch. This was not a repeat finding from the previous cycle and therefore did not contribute toward fiscal action calculations.
- Discussed requirements regarding processed product documentation and provided examples. USDA Food Fact Sheets can be found on USDA's website at <https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets/>. The CN Labels and Product Formulation Statements Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action.
- Please provide a Child Nutrition (CN) label and/or Product Formulation Statement (PFS) for Riverhill Poultry Originals Chicken Breast, Gold Kist Farms Chicken Fajita Strip, Packer Label Chicken Drumstick, Turkey Breast. If unable to provide a CN label or PFS, please provide written assurance that the product will no longer be offered/served to students. Additionally, please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation.*
- 4 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 13.25 oz eq grain were served during the week of review when 14 oz eq grain is required weekly at lunch for grades following the 9-12 meal pattern. This was not a repeat finding from the previous cycle and therefore did not contribute toward fiscal action calculations.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action.
- Please provide a written description of the changes that have been made to ensure that weekly grain quantities at lunch meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.*
- 5 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 1.25 oz eq grain was served on November 8, 2024 and 1.75 oz eq grain was served on November 9, 2024 when 2 oz eq grain is required daily at lunch for grades following the 9-12 meal pattern. This was not a repeat finding from the previous cycle and therefore did not contribute toward fiscal action calculations.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action.
- Please provide a written description of the changes that have been made to ensure that daily grain quantities at lunch meet minimum amounts required by the meal pattern.*

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| <p>6 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 1/8 cup of dark green vegetable subgroup was served during the week of review when 1/2 cup dark green vegetable is required weekly at lunch for grades following the 9-12 meal pattern. This was not a repeat finding from the previous cycle and therefore did not contribute toward fiscal action calculations.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern 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. The Using Appropriate Serving Utensils Recorded Webinar &amp; Webinar Slides 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 food quantities may result in fiscal action.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that weekly dark green vegetable subgroup quantities at lunch meet minimum amounts required by the meal pattern.</i></p> |
| <p>7 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 1 1/8 cup red/orange vegetable subgroup was served during the review period when 1 1/4 cup red/orange vegetable is required weekly at lunch for grades following the 9-12 meal pattern. This was not a repeat finding from the previous cycle and therefore did not contribute toward fiscal action calculations.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern 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. The Using Appropriate Serving Utensils Recorded Webinar &amp; Webinar Slides 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 food quantities may result in fiscal action.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that weekly red/orange vegetable subgroup quantities at lunch meet minimum amounts required by the meal pattern.</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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| 8 | Daily edit checks are not being conducted appropriately. Specifically, daily edit check does not include 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 at 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. 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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*No findings.*

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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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| 9 | 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, lunch adult meals were charged \$3.65 and should have been charged a minimum of \$3.84. | Discussed ways to determine adult meal prices which included a per meal cost analysis and pricing utilizing the Adult Meal Pricing Tool. For 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 located 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 increase adult meal prices, including the exact formula used to price adult meals. Additionally, please provide documentation demonstrating the prices have been increased to the appropriate level and documentation supporting that \$145.92 of non-Federal funds were used to cover the price of serving adult meals served during the review period.</i> |
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**General Program Compliance: Civil Rights**

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| 10 | The "And Justice for All" poster displayed was not the most current "And Justice for All" poster. Specifically, the 2015 version was posted. | Discussed 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>An updated And Justice for All poster was provided and posted on day of review. No further corrective action needed.</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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<p>11 The recent assessment of the implementation of the Local Wellness Policy did not meet the Final Rule requirements. Specifically, the assessment did not determine compliance with the wellness policy and progress made in attaining the goals of the wellness policy.</p>	<p>Discussed requirement to complete an assessment once every three years, at a minimum. The assessment must determine compliance with the wellness policy, how the wellness policy compares to model wellness policies, and progress made in attaining the goals of the wellness policy. SFA plans to use WellSAT and ADE resources to meet the final rule of the assessment for the local 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.</p>	<p><i>Please provide a written plan for conducting an assessment of the implementation of the Local Wellness Policy, including determining compliance with the wellness policy and progress made in attaining the goals of the wellness policy. 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></p>
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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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<p>12 The SFA's training tracking records do not include the required elements. Specifically, the training tracking records do not include topic/objectives (professional standards learning codes).</p>	<p>Discussed that although regulation does not specify the kind of records that must be kept, records that list the employee name, employer/school, training title, topic/objectives, training source, dates, and total training hours would be appropriate to demonstrate compliance with annual training requirements. 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.</p>	<p><i>Please provide the updated 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 records will include all required elements, including topic/objectives (professional standards learning codes).</i></p>
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13 School Nutrition Programs director, management, and staff tasked with National School Lunch Program procurement responsibilities have not completed annual training on Federal procurement standards.	Discussed that school nutrition program directors, management, and staff tasked with National School Lunch Program procurement responsibilities must complete annual training on Federal procurement standards annually. Additionally discussed that procurement training may count towards the professional standards training standards. 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. Procurement Basics training 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 certificate of completion of Procurement Basics (or an equivalent training on Federal procurement standards) for School Nutrition Programs director, management and staff tasked with National School Lunch Program procurement responsibilities. Additionally, please provide written assurance that annual training on Federal procurement standards will be completed annually.</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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14 The most recent food safety inspection report was not posted in a prominent location visible to all program participants.	Discussed making copies of most recent report and feasible places for posting, such as the main dining area, meal service line, school bulletin board, or front office.	<i>The most recent food safety inspection was posted in the cafeteria on the day of review. No further corrective action required.</i>
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**General Program Compliance: Reporting and Recordkeeping**

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15 Reports are not submitted to the State agency as required. Specifically, the submitted site application in CNPWeb indicated that Devereux Arizona-Sweetwater Campus is practicing Offer versus Serve (OVS) at breakfast for all grade groups when the site is practicing serve only at breakfast for all grade groups.	Discussed steps required to update the site application in CNPWeb to reflect current practice of serve only at breakfast for all grade groups, including notifying the assigned specialist approving applications of the update.	<i>An updated site application for Devereux Arizona-Sweetwater Campus was submitted to CNPWeb indicating the current practice of serve only is implemented at breakfast for all grade groups. No further corrective action provided.</i>
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**General Program Compliance: School Breakfast Program and Summer Food Service Program Outreach**

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16 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 Summer Food Service Program (SFSP) prior to the end of the school year and determined which was most feasible. Summer feeding locations can be found at <a href="https://www.azhealthzone.org/">https://www.azhealthzone.org/</a> .	<i>Please provide a written description of how households will be notified of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year, including the documentation that will be used for the notification. Additionally, please provide written assurance that this will occur at the end of each school year.</i>
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**Other Federal Program Reviews: Afterschool Snack Program**

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- 17 Snack counts were not correctly combined and recorded during the review period. This contributed toward fiscal action calculations. Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. *Please provide a written description of changes to the system that have been implemented to ensure that snack count totals are correctly combined and recorded, including the date of implementation.*

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**Other Federal Program Reviews: Seamless Summer Option**

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Will be reviewed in Summer 2025 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! Devereux Arizona has completed the Administrative Review for the 2025 program year. Thank you for your hospitality throughout the review process. It is recommended that the critical areas of the program are monitored internally to ensure ongoing compliance.

**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  
 No- NSLP       Yes- NSLP      \$0

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by January 31, 2025 to Destinee Williams at [Destinee.Williams@azed.gov](mailto:Destinee.Williams@azed.gov). The response must be on organizational letterhead and signed by an authorized representative and must indicate that corrective actions will be implemented SFA-wide.

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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 Hironaka, 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.