



**ARIZONA DEPARTMENT OF
EDUCATION**

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Maine Consolidated School District
 CTD: 03-03-10
 Site: Maine Consolidated School

Contacts: Justin Roberson, Superintendent and Phyllis Fielder, Food Service Director

Review Date: 11/14/2024

Exit Conference Date: 11/14/2024

Review Period: October 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

1	Direct certification matches were not certified correctly. Specifically, two students were certified as free based on partial match data from the previous school year. This contributed towards fiscal action calculations.	Discussed if the LEA can confirm that the partially-matched student is the individual shown in CNP Direct Certification, the user will certify the student as a Match. Additionally, discussed if the LEA confirms that the partially-matched student is not the individual described in CNP Direct Certification, the user will not certify the student and will declare the student as a No Match. Regardless if the student is identified as a Match or No Match, the user is required to review and accurately make a decision regarding the students match status using the Partial Match confirmation. Step-by-Step Instruction: How to Directly Certify a Partial Match can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Corrections have been made to certification status of these students. Please provide written procedures for how partially matched students will be processed. Additionally, please provide written assurance that eligibility statuses will be determined based on information from the current school year.</i>
2	Students without supporting eligibility documentation on file were provided free or reduced-price meal benefits. Specifically, two students were certified as free based on direct certification when there were no direct certification reports indicating they were matches. This contributed toward fiscal action calculations.	Discussed that students without eligibility documentation on file must be categorized as paid. Additionally discussed that all free and reduced-price applications, including applications from households determined ineligible for benefits, must be kept on file for a minimum of five years after the final claim is submitted for the fiscal year to which they pertain as is required by Arizona law and best practices of organization for eligibility documentation.	<i>Corrections have been made to the certification status of these students. Please provide written procedures that will be implemented to ensure that all free and reduced-price applications will be kept on file according to USDA's requirements and written assurance that any student without eligibility documentation will be not be provided free or reduced-price meal benefits.</i>

<p>3 In multiple instances, the date of certification was not transferred correctly to the benefit issuance document. Specifically, the date of certification did not indicate what program year the student received to qualify for free/reduced-price meal benefits. This contributed toward fiscal action calculations.</p>	<p>Discussed best practices for ensuring eligibility status is transferred to the benefit issuance document on a regular basis. The Step-by-Step Instruction: How to Create a Benefit Issuance Document (BID) can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.</p>	<p><i>Corrections have been made to the benefit issuance document. Please provide a written description of the process that will be implemented to ensure that the benefit issuance document matches all current students' eligibility status, including the date of certification. Additionally, the certificate of completion of Step-by-Step Instruction: How to Create a Benefit Issuance Document (BID) must be submitted.</i></p>
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Performance Standard 1: Meal Counting and Claiming – Critical Area

<p>4 Meal count totals by eligibility category were not correctly combined and recorded at breakfast and lunch during the review period. This was deemed a non-systemic error and contributed 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.</p>	<p><i>Please provide a written description of changes to the system that have been implemented to ensure that meal count totals by eligibility category are correctly combined and recorded, including the date of implementation.</i></p>
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Performance Standard 2: Meal Components & Quantities – Critical Area

<p>5 Food quantities observed at lunch on the day of review did not meet minimum amounts required by the meal pattern. Specifically, 1/2 cup of vegetables was served when 3/4 cup is required daily at lunch for grades K-8. This was determined to be a repeat finding from the previous cycle and contributed 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 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.</p>	<p><i>Please provide a written description of the changes that have been made to ensure that daily vegetable 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.</i></p>
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6 The following vegetable subgroup was not offered during the review period: Beans/Peas (legumes).

Discussed vegetable subgroup requirements for the age/grade groups served. vegetable Subgroup Quick Guide can be found on ADE's website at <https://www.azed.gov/hns/nslp/forms> under the Menu Planning accordion. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. Please note that repeated violations involving vegetable subgroups may result in fiscal action.

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.

7 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 1/2 cup of vegetables were served on October 14 and October 17, 2024 when 3/4 cups is required daily at lunch for grades K-8. This was determined to be a repeat finding from the previous cycle 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 (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 vegetable quantities at lunch meet minimum amounts required by the meal pattern.

- 8 Food quantities served at breakfast during the review period did not meet minimum amounts required by the meal pattern. Specifically, 1/2 cup of fruit was served on October 17, 2024 when 1 cup is required daily at breakfast for grades K-8.
- 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 Breakfast 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 Breakfast 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 and/or termination of performance-based reimbursement (extra 8 cents).
- Please provide a written description of the changes that have been made to ensure that daily fruit quantities at breakfast meet minimum amounts required by the meal pattern.*
- 9 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 2 3/4 cup of vegetables were served between October 14 - October 17, 2024 when 3 cups is required weekly at lunch for grades K-8. This was determined to be a repeat finding from the previous cycle 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 (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 vegetable quantities at lunch meet minimum amounts required by the meal pattern.*

<p>10 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 1/2 cup of red/orange vegetable subgroup was served between October 14 - October 17, 2024 when 3/4 cup is required weekly at lunch for grades K-8. This was determined to be a repeat finding from the previous cycle and contributed 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 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.</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

No Findings.

Meal Access & Reimbursement: Certification and Benefit Issuance

No Findings.

Meal Access & Reimbursement: Verification

<p>11 Direct verification procedures were not followed correctly. Specifically, direct verification was conducted after issuing the Notification of Verification letter to households.</p>	<p>Discussed direct verification must be conducted prior to notifying families. If a student is verified through direct verification, verification is complete for the household. In this case, the household should not be contacted to provide income documentation. Referred to Section 6: Verification in USDA's Eligibility Manual for School Meals found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion.</p>	<p><i>Please provide written procedures that will be implemented when conducting verification to ensure direct verification is conducted prior to contacting households.</i></p>
<p>12 The SFA did not have sufficient documentation to support follow-up attempts to households that did not adequately respond to the request for verification.</p>	<p>Discussed requirement for SFAs to document contact was attempted in writing (mail or email) or by telephone or text message. Referred to Verification Tracking Form found at https://www.azed.gov/hns/nslp/forms under the Calendars and Checklists accordion. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion.</p>	<p><i>Please provide written procedures that will be implemented when following up with households that did not adequately respond to the request for verification, including how it will be documented.</i></p>

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| <p>13 Verification procedures were not followed correctly. Specifically, households for whom benefits were to be reduced or terminated as a result of verification were not provided 10 calendar days advance notification prior to the actual reduction or termination.</p> | <p>Discussed that if benefits are decreased during verification, SFAs must provide 10 days advance notification to households prior to the actual reduction or termination of benefits. Referred to ADE's Verification Tracking Form and Online Training: Verification Review on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion.</p> | <p><i>Please provide the written procedures for ensuring that households for whom benefits are to be reduced or terminated will be given 10 calendar days written advance notice of the change.</i></p> |
| <p>14 Verification activities were not completed by November 15. Specifically, households were not notified of the results of verification until November 18, 2024.</p> | <p>Discussed requirement for completion of verification activities by November 15, including the notification of verification results. Referred to Verification Best Practices Calendar and Online Training: Verification Review found at https://www.azed.gov/hns/nslp/forms under the Calendars and Checklists accordion.</p> | <p><i>Please provide written assurance that verification will be completed by November 15 each year, as well as the steps that will be taken to ensure this requirement is adhered to.</i></p> |

Meal Access & Reimbursement: Meal Counting and Claiming

No Findings.

Meal Pattern & Nutritional Quality: Offer Versus Serve

No Findings.

Meal Pattern & Nutritional Quality: Meal Components and Quantities

No Findings.

Resource Management

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| <p>15 Documentation was not provided to support the usage of Supply Chain Assistance funds. Additionally, a plan was not provided for the use of the Supply Chain Assistance funds.</p> | <p>Discussed that the attestation statement signed by the SFA detailed that the SFA will use Supply Chain Assistance (SCA) funds only for purchasing unprocessed or minimally processed domestic food products and that SFAs are required to maintain purchasing and other related records for review and audit purposes. Referred to SP 03-2022: Allocation of Supply Chain Assistance (SCA) Funds to Alleviate Supply Chain Disruptions in the School Meal Programs located on ADE's website at https://www.azed.gov/hns/memos.</p> | <p><i>Please provide documentation demonstrating how the \$33,630.81 of Supply Chain Assistance funds were spent. If funds have not yet been expended in full, please provide a plan on how the remaining Supply Chain Assistance funds will be spent. Additionally, provide a written description of how documentation of expenses will be maintained.</i></p> |
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General Program Compliance: Civil Rights

No Findings.

General Program Compliance: SFA On-Site Monitoring

Not Applicable.

General Program Compliance: Local Wellness Policy

16 The recent assessment of the implementation of the Local Wellness Policy (LWP) did not meet the Final Rule requirements. Specifically, the assessment did not measure how the LEA's LWP compares to a model wellness policy.	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. Discussed utilizing ADE's LWP Assessment tool to ensure all requirements are being met. 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 https://www.azed.gov/hns/nslp/forms under the Local Wellness Policy accordion. Local Wellness Policy Assessment: Making it Meaningful Webinar can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training accordion.	<i>Please provide a written plan for conducting an assessment that compares the LWP to a model 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>
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17 The public was not notified of the results of the most recent assessment of the implementation of the Local Wellness Policy (LWP).	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. Discussed utilizing the school website as a method of publicizing the assessment. The USDA's Local Wellness Policy Outreach Toolkit can be found at https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit .	<i>Please provide the notification provided to the public of the results of the most recent assessment of the implementation of the LWP. Additionally, please provide written assurance that the public will be notified of results each time the LWP is assessed.</i>
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General Program Compliance: Competitive Food Services

Not Applicable.

General Program Compliance: Professional Standards

18 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 https://theicn.org/icn-resources-a-z/food-safety/ .	<i>Food Safety Certification was completed on January 20, 2023. No further corrective action is required.</i>
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19 School Nutrition Programs director has 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 https://www.azed.gov/hns/nslp/training under the Build Your Employees Training Plans accordion. Procurement Basics training can be found on ADE's website at https://www.azed.gov/hns/nslp/training 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. 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

No Findings.

General Program Compliance: Food Safety, Storage and Buy American

20 Although a copy of the written food safety plan was on site, it was stored in the dry storage filing cabinets and was not easily accessible during meal preparation and service.	Discussed that the written food safety plan should be easily available at each food preparation and food service site and that staff should be aware of its existence.	<i>Please provide written assurance that a copy of the written food safety plan has been made available in the meal service area.</i>
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General Program Compliance: Reporting and Recordkeeping

21 Breakfast and lunch production records provided do not indicate different portion sizes for different grade groupings such as Pre-K and K-8.	Discussed using Production Record for Multiple Grade Groupings found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Please provide copies of completed lunch Production Record for Multiple Grade Groupings for 5 consecutive days. Additionally, the certificate of completion of Production Record Overview must be provided.</i>
22 Production record crediting is inaccurate. Specifically, cheeseburger served at lunch on October 17, 2024 credited as 3.00 oz eq of meat/meat alternate; however, the production record indicated it contained 4.00 oz eq of meat/meat alternate.	Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Crediting resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion.	<i>Please provide a production record that reflects the correct crediting information for the cheeseburger. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i>

23 Production record crediting is inaccurate. Specifically, coleslaw served at lunch on October 17, 2024 credited as 1/8 cup of dark green vegetables; however, the production record indicated it contained 1/2 cup of dark green vegetables.	Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Crediting resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion.	<i>Please provide a production record that reflects the correct crediting information for coleslaw.</i>
24 Production record crediting is inaccurate. Specifically, the single lettuce fillet/leaf served at lunch on October 17, 2024 was not a sufficient serving to credit toward a vegetable component; however, the production record indicated it contained 1/2 cup of dark green vegetables.	Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Crediting resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion.	<i>Please provide a production record that reflects the correct crediting information for lettuce.</i>
25 Production record crediting is inaccurate. Specifically, orange slices served at breakfast on October 17, 2024 credited as 1/2 cup of fruit; however, the production record indicated it contained 1 cup of fruit.	Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Crediting resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion.	<i>Please provide a production record that reflects the correct crediting information for orange slices.</i>

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

No Findings.

Other Federal Program Reviews: Afterschool Snack Program

26 Snack counts free and paid category 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.	<i>Please provide a written description of changes to the system that have been implemented to ensure that snack count totals free and paid categories are correctly combined and recorded, including the date of implementation.</i>
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Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2024 if applicable.

Other Federal Program Reviews: Fresh Fruit and Vegetable Program

Not Applicable.

Other Federal Program Reviews: Special Milk Program

Not Applicable.

Other Federal Program Reviews: At-Risk Afterschool Meals

Not Applicable.

Comments/Recommendations:

Congratulations, Maine Consolidated School District has successfully completed the administrative review for the 2024-2025 school year. It is recommended that trainings in Meal Count and Claiming and Meal Components and Quantities are completed throughout the year. It is also recommended that internal compliance checks are conducted periodically in these critical areas to maintain program integrity. Thank you for your cooperation during the review process.

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?

<input checked="" type="checkbox"/> No- SBP	<input type="checkbox"/> Yes- SBP	\$85.03
<input type="checkbox"/> No- NSLP	<input checked="" type="checkbox"/> Yes- NSLP	\$1,328.14

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by February 7, 2025 to Jackie Rodriguez at Jackie.Rodriguez@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.

Reviewer Signature

Date

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
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