



**ARIZONA DEPARTMENT OF
EDUCATION**

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Fountain Hills Unified District

CTD: 07-02-98

Site: Fountain Hills High School

Contacts: Tammy Rigsby, NSLP Acct Manager; Cain Jagodzinski, Superintendent

Review Date: January 30, 2025

Exit Conference Date: January 30, 2025

Review Period: December 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
Performance Standard 1: Certification and Benefit Issuance – Critical Area			
1	Students without supporting eligibility documentation on file were provided free meal benefits. Specifically, 1 student was provided free benefits with no household income application or Foster, Homeless, and/or Migrant documentation. 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>
2	Student eligibility certification was incorrectly determined. Specifically, 1 student was miscategorized as Free when income qualified them for Reduced. This contributed toward fiscal action calculations.	Discussed errors found and required corrective action. Referred to Processing Applications, Reviewing Applications Based on Income, Assessing Completeness of Categorically Eligible Applications, Determining Eligibility for Categorically Eligible Applications section 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. Required completing the training: Step-by-Step Instruction: How to Process Household Applications 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 errors. Please describe the process that will be implemented to reduce the amount of errors that occur while determining the eligibility status for each student. Additionally, the certificate of completion of Step-by-Step Instruction: How to Process Household Applications must be submitted.</i>

<p>3 Meal eligibility is not being extended to all members of a household when one person in that household is receiving SNAP, TANF, FDPIR, or Medicaid benefits. Specifically, 1 student was provided Medicaid Reduced benefits when documentation indicated other members in the household were directly certified for Medicaid Free. This did not contribute towards fiscal action calculations.</p>	<p>Discussed that If one child or adult in the household receives Assistance Program benefits, categorical eligibility for free meal benefits through the CNPs is extended to all children in that household. Referred to Assistance Program Participants in The Direct Certification Process section 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>Corrections have been made to certification status of these students. Please provide a written description of how eligibility will be extended to all household members when one person in that household is receiving Assistance Program (SNAP, TANF, FDPIR, Medicaid) benefits.</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 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 During the week of review, at least 80% of grains served at breakfast were not whole grain-rich. Specifically, only 77.8% of grains served at breakfast during December 2-6, 2024 were whole grain-rich.</p>	<p>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 https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion.</p>	<p><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></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>6 Households selected for verification were not informed, in writing, of selection.</p>	<p>Discussed requirements for notifying households selected for verification and potential timelines. Referred to Notification of Verification Letter and Online Training: Verification Review found on ADE's website at https://www.azed.gov/hns/nslp/training. Additionally, 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 assurance that households selected for verification will be notified, in writing, according to requirements. Additionally, provide a copy of the notification letter that will be used for this purpose.</i></p>
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Meal Access & Reimbursement: Meal Counting and Claiming

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| 7 | The local meal charge policy that is developed communicates conflicting policy procedures in accruing negative balances. | Discussed the Unpaid Meal Charge Policy and referred to memos SP 29-2017, SP 29-2017a, SP 23-2017 and HNS 14-2017, which can be found on ADE's website at https://www.azed.gov/hns/memos . | <i>Please provide a copy of the revised local meal charge policy that demonstrates nonconflicting policies.</i> |
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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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| 8 | Operating losses as the result of bad debt from unpaid student meal accounts were not being accurately tracked. Specifically, SFA does not have a process in place to document bad debt to validate whether any was encumbered nor a procedure for how bad debts are recovered. | Discussed that when local officials determine further collection efforts for delinquent debt are useless or too costly, the debt must be reclassified as "bad debt." Once a delinquent debt is reclassified as a bad debt, it must be written off as an operating loss and restored using non-Federal funds. The nonprofit school food service account may not be used to cover costs related to the bad debt, such as continued legal and collection costs. Instead, these losses must be restored using non-Federal funds. These funds may come from the school district's general fund, special funding from State or local governments, or any other non-Federal sources. Referred to USDA Memo SP 23-2017: Unpaid Meal Charges: Guidance and Q&A. | <i>Please provide a written description of how collecting and restoring bad debt from unpaid student meal accounts will be tracked. Additionally, please provide written assurance that the collection of bad debt will be restored with Non-Federal funds.</i> |
| 9 | Compliance with the revenue from nonprogram food requirements via either the Nonprogram Food Revenue Tool or 5-Day Reference Period as described in FNS Policy Memo SP 20-2016 was not assessed. | Discussed that assessing compliance with revenue from nonprogram foods requirements ensures that revenues from the sales of nonprogram foods generate at least the same proportion of SFA revenues as they contribute to SFA food costs. Referred to Nonprogram Food Revenue Tool & Calculator located on ADE's website at https://www.azed.gov/hns/nslp/forms/ under the Financial accordion. | <i>Please complete and submit either the USDA Nonprogram Food Revenue Tool or 5-Day Reference Period to support compliance with revenue from nonprogram food requirements.</i> |

General Program Compliance: Civil Rights

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| 10 | The USDA nondiscrimination statement not printed on appropriate program materials. Specifically, the Notification of Benefits letter, Verification Notification Template and food service webpage did not include the USDA nondiscrimination statement. | Discussed where to find nondiscrimination statement on ADE's website at https://www.azed.gov/hns/civilrights and whether long or short statement would be most appropriate. | <i>Please provide an updated Notification of Benefits letter, Verification Notification Template and food service webpage with the nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated to include the appropriate nondiscrimination statement.</i> |
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<p>11 Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, the school district handles program related civil rights complaints internally.</p>	<p>Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., ADE, Food & Nutrition Services Southwest Regional Office, FNS Office of Civil Rights, or USDA Office of Civil Rights). The SFA's procedures must note whether an allegation is made verbally or in person. The SFA staff member receiving the allegation must transcribe the complaint. The SFA's procedures for receiving a complaint cannot prevent a complaint from being accepted. Additionally, the SFA's procedures must not indicate that they attempt to resolve the complaint themselves nor can the SFA's complaint process be a prerequisite for accepting a complaint. Additional guidance can be found on ADE's website at https://www.azed.gov/hns/civilrights. The Step-by-Step Instruction: How to File a Civil Rights Complaint can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.</p>	<p><i>Please provide a written description of the updated process and procedures for processing complaints alleging discrimination which meets requirements. Additionally, the certificate of completion of Step-by-Step Instruction: How to File a Civil Rights Complaint must be submitted.</i></p>
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General Program Compliance: SFA On-Site Monitoring

<p>12 On-site reviews of the breakfast and lunch meal counting and claiming procedures for all sites within the SFA did not have all fields completed. Specifically, it did not ensure the counting system yields the actual number of reimbursable free, reduced price and paid meals served on day of observation.</p>	<p>Discussed that every school year, each school food authority with more than one school shall perform no less than one on-site review of the counting and claiming system for each school under its jurisdiction prior to February 1. The Internal On-Site Monitoring Form - Lunch template can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational accordion. Discussed who would be responsible for completing this each year.</p>	<p><i>Corrections to counts by category were updated on site. Please provide written assurance that all fields on the On-Site Monitoring Form will be completed by February 1.</i></p>
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General Program Compliance: Local Wellness Policy

<p>13 The public is not being notified of the existence and contents of the Local Wellness Policy. Specifically, the complete local wellness policy was not included in the student handbook and was not posted on the school website.</p>	<p>Discussed feasible means of notifying the public about the Local Wellness Policy such as posting it on the school website. SFA intends to include the completed local wellness policy in the student handbook and on the district website. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training accordion.</p>	<p><i>Please provide a written description of how the public will be notified of the existence and contents of the Local Wellness Policy.</i></p>
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14 A recent assessment of the implementation of the Local Wellness Policy 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 Local Wellness Policy, how the LEA's Local Wellness Policy 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 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 of the implementation of the Local 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>
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General Program Compliance: Competitive Food Services

15 Foods and beverages sold to students in grades 9-12 during the school day do not meet Smart Snacks Standards. Specifically, Regular Doritos (exceeds fat limits for snacks), Twin Pops (do not meet any general nutrition standards), and Rockin' Protein (exceeds calorie requirements for beverages).	Discussed Smart Snacks requirements for grades 9-12 including that all foods and beverages sold to students during the school day (defined as the midnight before to 30 minutes after the end of the school day) must meet Smart Snack requirements. The Alliance for a Healthier Generation Smart Snacks Product Calculator can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational accordion. Smart Snacks Summary Chart and additional resources can be found on USDA's website at https://www.fns.usda.gov/school-meals/tools-schools-focusing-smart-snacks . The Online Course: Smart Snacks and Competitive Foods Standards in Arizona can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Please provide written procedures for assessing whether a product meets Smart Snacks Standards and written assurance that Regular Doritos, Twin Pops and Rockin' Protein will no longer be sold during the school day. Additionally, the certificate of completion of Online Course: Smart Snacks and Competitive Foods Standards in Arizona must be submitted.</i>
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General Program Compliance: Professional Standards

16 The School Nutrition Program Director hired on or 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>Please provide the expected date that food safety certification training will be completed by the School Nutrition Program Director.</i>
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17 School Nutrition Programs director and staff tasked with National School Lunch Program procurement responsibilities (Director of Finance and Supporting Services) 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 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 and staff tasked with National School Lunch Program procurement responsibilities (Director of Finance and Supporting Services). 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

No findings.

General Program Compliance: Reporting and Recordkeeping

No findings.

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

18 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 School Breakfast Program (SBP) at the start of the school year. Additionally, discussed SBP outreach should include: serving times, locations where breakfast is available, and SBP costs.	<i>Please provide a written description of how households will be notified of the availability of the School Breakfast Program at the beginning 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 beginning of each school year.</i>
19 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 https://www.azhealthzone.org/ .	<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>

Other Federal Program Reviews: Afterschool Snack Program

Not applicable.

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2025 if applicable.

Other Federal Program Reviews: Fresh Fruit and Vegetable Program
