



**ARIZONA DEPARTMENT OF  
EDUCATION**

**Health and Nutrition Services Division**

**Administrative Review Summary Report**

School Food Authority Name: Buckeye Elementary Distirct

CTD: 07-04-33

Site: Inca Elementary School and Sundance Elementary

Contacts: Chad Lanese, Superintendent and Lucia Guerra, Child Nutrition Director

Review Date: December 16 and 17, 2024

Exit Conference Date: December 17, 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**

1	Direct certification matches were not correctly certified. Specifically, 4 students who matched in Medicaid-Reduced were provided free meal benefits. This contributed toward fiscal action calculations.	Discussed how to properly certify students who match as Medicaid-Reduced in direct certification. Referred to Determining Eligibility for Categorically Eligible Applications 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.	<i>Corrections have been made to certification errors. Please describe the process that will be implemented to ensure direct certification matches are provided appropriate meal benefits. Additionally, please provide written assurance that all students who match in Medicaid-Reduced will be provided reduced-price benefits.</i>
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**Performance Standard 1: Meal Counting and Claiming – Critical Area**

*No Findings.*

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

2	Fluid milk was not available in at least two varieties at Sundance Elementary at breakfast during the review period. This was determined to be a repeat finding from the previous cycle and contributed toward fiscal action calculations.	Discussed variety requirement and feasible options for compliance. Allowable milk varieties are fat-free, unflavored; fat-free, flavored; low-fat (1%), unflavored; and low-fat (1%) flavored. Please note that repeated violations involving milk requirements may result in fiscal action.	<i>Please provide one week of breakfast production records that demonstrate that fluid milk was available in at least two varieties. Additionally, please provide written assurance that fluid milk will always be available in at least two varieties at breakfast.</i>
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- 3 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 1/2 cup vegetable was served on November 1, 4, 6, 8, 12, 13, 14, 15, 18, 19, 20, 21, and 22nd, 2024, at Sundance Elementary when 3/4 cup is required daily at lunch for grades K-8. Additionally, 1/2 cup vegetable was served on November 1, 4, 6, 12, 13, 14, 15, 18, 19, 20, 21, 22, and 25, 2024, at Inca Elementary School 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.
- 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. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.*
- 4 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 0.75 ounce equivalent grain was served on November 8, 2024 at Sundance Elementary when 1 ounce equivalent 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 grain quantities at lunch meet minimum amounts required by the meal pattern.*

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| <p>5 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 6 ounce equivalents grain was served during the week of review at Inca Elementary School when 8 ounce equivalents are required weekly at lunch for grades K-8. Additionally, 6.75 ounce equivalents grain was served during the week of review at Sundance Elementary when 8 ounce equivalents are required 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 <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 grain quantities at lunch meet minimum amounts required by the meal pattern.</i></p>   |
| <p>6 Meals served to preschool students did not meet requirements. Specifically, the following unallowable grain-based desserts were served to preschool students on November 8, 2024: Apple Frudel. This contributed toward fiscal action calculations.</p>   | <p>Discussed grain-based desserts such as cookies, sweet pie crusts, doughnuts, cereal bars, breakfast bars, granola bars, sweet rolls, toaster pastries, cakes, and brownies are not creditable as part of the reimbursable meal but may be served as an extra meal item. Referred to SP 01-2018 Updated Infant and Preschool Meal Patterns in the National School Lunch Program and School Breakfast Program; Questions and Answers. Meal pattern requirements for CACFP can be found on ADE's website at <a href="https://www.azed.gov/hns/cacfp">https://www.azed.gov/hns/cacfp</a> under the Meal Pattern accordion. Team Nutrition Training: Grain-Based Desserts in the CACFP can be found on ADE's website at <a href="https://www.azed.gov/hns/cacfp/cacfptraining">https://www.azed.gov/hns/cacfp/cacfptraining</a> under the Nutrition Virtual Trainings accordion.</p>   | <p><i>Please provide one week of breakfast production records which demonstrates that allowable grain items were served to preschool students. Additionally, please provide a written description of the changes that have been made to ensure grain-based dessert items will not be served to preschool students.</i></p>     |
| <p>7 On the day of review, it was observed that 3 breakfasts counted for reimbursement did not contain all of the required meal components at Sundance Elementary. Specifically, 3 participants left the point of service without a 1/2 cup fruit/vegetable. This 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. Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. The Recognizing a Reimbursable Breakfast Meal at the Point of Service Recorded Webinar &amp; 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.</p>   | <p><i>Please provide a written description of the changes that have been made to ensure that all breakfasts counted for reimbursement contain all of the required meal components. Additionally, the certificate of completion of Recognizing a Reimbursable Breakfast Meal at the Point of Service must be submitted.</i></p> |

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

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No Findings.

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

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*No Findings.*

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**Meal Access & Reimbursement: Verification**

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*No Findings.*

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

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| 8 | Daily edit checks are not being conducted appropriately. Specifically, attendance-adjusted eligibility is not being calculated at Inca Elementary School and Sundance Elementary. | 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 <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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| 9  | Offer versus Serve (OVS) was implemented at breakfast for preschool students who were not co-mingled with other grade groups at Sundance Elementary. | Discussed preschool meal service requirements. Specifically, Offer versus Serve (OVS) is not allowable for preschoolers who are not co-mingled with other grade groups. Referred to SP 01-2018 Updated Infant and the updated preschool meal patterns in the National School Lunch Program and School Breakfast Program; Questions and Answers. Additional resources for the updated preschool meal pattern can be found at <a href="https://www.azed.gov/hns/cacfp">https://www.azed.gov/hns/cacfp</a> under the Meal Pattern accordion. | <i>Please provide a written description demonstrating how the correct meal service (i.e., serve only or family style) will be implemented for preschool students. Additionally, please provide written assurance that moving forward, OVS will not be implemented for preschool students.</i> |
| 10 | Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast at Inca Elementary School.                    | Discussed feasible options for signage and potential content as well as the plan for creating and posting near the point of service. Printable reimbursable meal signage can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning accordion.  | <i>Corrections were made on site. No further corrective action is needed.</i>   |

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**Resource Management**

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| 11 Indirect costs were incorrectly calculated. Specifically, the correct indirect cost rate was applied to an incorrect direct cost base; the direct cost base utilized in the calculation did not reflect all expenditures from July 1, 2023–June 30, 2024. | Discussed proper classification of direct/indirect costs. Reviewed requirements that indirect costs be charged consistently across the SFA as required in 2 CFR 200.412-414. Referred to the USDA's Indirect Cost Guidance Manual located at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals accordion, which can be used as a resource when determining allowable indirect costs. | <i>Please provide the calculation or tool that will be used to determine the amount of indirect costs charged to the nonprofit school food service account.</i> |
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**General Program Compliance: Civil Rights**

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| 12 The public media release was not provided to local media, the unemployment office, and/or and local employers considering large layoffs.   | Discussed requirements and timeframe for public media release, and best options locally for submitting the release to prior to the start of the school year. The Public Media Release template 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 Organizational accordion. | <i>Please provide written procedures that will be followed each year for distributing the public media release, including who will be responsible for ensuring it is sent to the appropriate local media and what local media it will be sent to.</i> |
| 13 The USDA nondiscrimination statement not printed on appropriate program materials. Specifically, the dietary accomodation form did not include the USDA nondiscrimination statement. | Discussed where to find nondiscrimination statement on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> and whether long or short statement would be most appropriate.  | <i>Please provide an updated dietary accomodation form 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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**General Program Compliance: SFA On-Site Monitoring**

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*No Findings.*

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**General Program Compliance: Local Wellness Policy**

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| 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 <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 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**

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*No Findings.*

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**General Program Compliance: Professional Standards**

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- 15 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 to complete the annual training requirements. 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 <https://www.azed.gov/hns/nslp/training/>. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <https://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. *Please provide the expected date that the training requirement will be met as well as the name, date and content information of trainings that the School Nutrition Program Manager 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.*
- 16 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 to complete the annual training requirements. Discussed 6 hour training requirement and feasibility for attending upcoming applicable trainings. Training Curriculum for Arizona Child Nutrition Professionals Operating the National School Lunch and School Breakfast Program can be found on ADE's website at <https://www.azed.gov/hns/nslp/training> under the Build Your Employees Training Plans accordion. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <https://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. *Please provide the expected date that the training requirement will be met as well as the name, date and content information of trainings that full-time School Nutrition Program staff are registered for.*
- 17 Part-time School Nutrition Program staff have not met the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed to complete the annual training requirements. Discussed 4 hour training requirement and feasibility for attending upcoming applicable trainings. Training Curriculum for Arizona Child Nutrition Professionals Operating the National School Lunch and School Breakfast Program can be found on ADE's website at <https://www.azed.gov/hns/nslp/training> under the Build Your Employees Training Plans accordion. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <https://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. *Please provide the expected date that the training requirement will be met as well as the name, date and content information of trainings that part-time School Nutrition Program staff are registered for.*
- 18 Employees were not appropriately categorized per Professional Standards definitions. Specifically, employees that worked more than 20 hours per week in the School Nutrition Programs were categorized as part-time employees. Reviewed all employees with NSLP related responsibilities and helped SFA categorize employees appropriately. Training Curriculum for Arizona Child Nutrition Professionals Operating the National School Lunch can be found on ADE's website at <https://www.azed.gov/hns/nslp/training> under the Build Your Employees Training Plans accordion. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <https://www.azed.gov/hns/nslp/training> under the Online Training Library accordion. *Please provide a written description of how it will be ensured that employees are appropriately categorized per Professional Standards definitions.*

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| <p>19 The school nutrition programs director, finance coordinator, finance director, CFO, and purchaser have not completed annual training on Federal procurement standards.</p> | <p>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.</p> | <p><i>Please provide the certificate of completion of Procurement Basics (or an equivalent training on Federal procurement standards) for the school nutrition programs director, finance coordinator, finance director, CFO, and purchaser. Additionally, please provide written assurance that annual training on Federal procurement standards will be completed annually.</i></p> |
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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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*No Findings.*

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**General Program Compliance: Reporting and Recordkeeping**

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*No Findings.*



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

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20 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>
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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 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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21 The At-Risk Afterschool Meals does not conduct acceptable education or enrichment activities before, during or after the supper service. Specifically, no activities are being offered to participants at Inca Elementary School and Sundance Elementary.	Discussed children must be provided with regular scheduled activities in an organized, structured, and supervised environment. The At-Risk Afterschool Meals must include educational or enrichment activities (e.g., mentoring or tutoring programs) that are open to all children under the age of 18.	<i>Please provide a written description of the changes that have been made to the At-Risk Afterschool Meals activities, or update the CNPweb Site Applications to indicate Inca Elementary School and Sundance Elementary are not participating in At-Risk Afterschool Meals.</i>
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Comments/Recommendations:

Congratulations, Buckeye Elementary District has successfully completed the Administrative Review for the 2024-2025 school year. Thank you for your cooperation during the review process. Please remember that we have a variety of trainings to assist you and your staff in operating a successful National School Lunch Program.

**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      \$348.32  
 No- NSLP       Yes- NSLP      \$49,450.99

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by February 14, 2025 to Megan Lynch at [Megan.Lynch@azed.gov](mailto:Megan.Lynch@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

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Program Director Signature                      Date

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

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

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