



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Paloma School District

CTD: 07-03-94

Site: Kiser Elementary School

Contacts: Kristin Turner, Head Teacher and Amber Conde, Cafeteria Manager

Review Date: March 20, 2025

Exit Conference Date: March 20, 2025

Review Period: February 2025

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			

No findings.

Performance Standard 1: Meal Counting and Claiming – Critical Area

No findings.

Performance Standard 2: Meal Components & Quantities – Critical Area

1	The meal service was not structured to comply with the meal pattern requirements of the multiple grade groups that were served. Specifically, separate production records were not kept for meals served to non-comingled preschool students to support that preschool students were not provided flavored milk.	Discussed allowable meal pattern grade groups per the grades served and feasible options for structuring the meal service to comply with quantity requirements (e.g., recipes changes, portion size changes, how to differentiate between students in different groups). Please note that repeated violations involving food quantities may result in fiscal action.	<i>Please provide a written description of the changes that have been implemented to ensure that production records are kept for multiple grade groups served.</i>
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| <p>2 Meals served to preschool students did not meet requirements. Specifically, the following unallowable grain-based desserts were served to preschool students on February 4 and 20, 2025 at breakfast: donuts holes and mini cinnamon rolls. 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 https://www.azed.gov/hns/cacfp under the Meal Pattern accordion. Team Nutrition Training: Grain-Based Desserts in the CACFP can be found on ADE's website at https://www.azed.gov/hns/cacfp/cacfptraining 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> |
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Performance Standard 2: Dietary Specifications and Nutrient Analysis – Critical Area

No findings.

Meal Access & Reimbursement: Certification and Benefit Issuance

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| <p>3 Although the site is operating on Provision 2 Non-Base Year, the school's food service website includes a Free and Reduced-Price statement that encourage parents to apply for Free and Reduced-meals for students.</p> | <p>Discussed how a school participating in Provision 2 Non-Base Year, must ensure reimbursable breakfasts and lunches are provided at no cost to all students and must not distribute or collect applications for free and reduced-price school meals on behalf of children.</p> | <p><i>Please provide written assurance that, while the school is participating in the Provision 2 Non-Base Year, applications for free and reduced-price school meals will not be distributed and students will not be charged for meals. Additionally, please provide a screenshot of the updated food service webpage.</i></p> |
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Meal Access & Reimbursement: Verification

No findings.

Meal Access & Reimbursement: Meal Counting and Claiming

No findings.

Meal Pattern & Nutritional Quality: Offer Versus Serve

Not applicable.

Meal Pattern & Nutritional Quality: Meal Components and Quantities

No findings.

Resource Management

No findings.

General Program Compliance: Civil Rights

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| 4 | The USDA nondiscrimination statement used on program materials is not the most current USDA statement. Specifically, the school breakfast outreach material did not contain the most current 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 school breakfast outreach material with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i> |
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General Program Compliance: SFA On-Site Monitoring

Not applicable.

General Program Compliance: Local Wellness Policy

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| 5 | The Local Wellness Policy did not contain all required elements. Specifically, the Local Wellness Policy did not contain policies for food and beverage marketing. | Discussed updating the Local Wellness Policy to include policies that allow marketing and advertising of only those foods and beverages that meet Smart Snacks Standards during the school day. Explained that this requirement applies to exterior vending machines, posters, menu boards, coolers, trash cans and cups used for beverage dispensing. 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. | <i>Please provide a written plan for how policies for food and beverage marketing will be added to the Local Wellness Policy. The plan should include draft language of the element to be added, who will be involved in updating the Local Wellness Policy and the date the update is expected to be completed. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.</i> |
| 6 | 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> |

General Program Compliance: Competitive Food Services

Not applicable.

General Program Compliance: Professional Standards

7 School Nutrition Programs director and Superintendent/Business Manager 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 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 Superintendent/Business Manager 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

No findings.

General Program Compliance: Food Safety, Storage and Buy American

8 A copy of the written food safety plan was not accessible during meal preparation and service. Specifically, the food safety plan was stored in the front office 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>Correction was made during on-site visit, and no further action needed.</i>
9 The following products observed on-site at Kiser Elementary School were in violation of the Buy American Provision and documentation justifying a Buy American exception were not maintained on file for non-domestic Apple Juice that included ingredients from Poland, Ukraine, Austria, Argentina, Chile, China, and Turkey.	Discussed that funds used from the nonprofit school food service account must be used to procure food products that comply with the Buy American Provision. Additionally discussed procedures for documenting a Buy American exception. Referred to SP38-2017, Buy American Webinar and FAQ. Additional information on the requirements of this provision, including ADE's prototype Buy American exception document, can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational accordion. Buy American Recorded Webinar and FAQ can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Please provide a written description of the changes that have been made to procurement and/or recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i>
10 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 during the on-site review. No further action is required.</i>

General Program Compliance: Reporting and Recordkeeping

11 Production record crediting is inaccurate. Specifically, the following items did not reflect correct crediting information: Specifically, the following items did not reflect the correct crediting information: lasagna with ground beef and beef taco.	Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Additionally discussed that crediting information is not a required element of a production record and therefore is not required to be included on the production record. 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 written description of changes made to ensure crediting is correctly reflected on production records. If the operation chooses not to include the optional crediting information on the production record moving forward, please provide production records for 5 consecutive days demonstrating that it is no longer included.</i>
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General Program Compliance: School Breakfast Program and Summer Food Service Program Outreach

No findings.

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

Not applicable.

Other Federal Program Reviews: Special Milk Program

Not applicable.

Other Federal Program Reviews: At-Risk Afterschool Meals

Not applicable.

Comments/Recommendations:

Congratulations! Paloma School District has completed the Administrative Review in the 2024-2025 School Year. Thank you for all of your hard work and organization throughout the administrative review process. It was a pleasure meeting you all, and thank you for working so diligently to assure that your students are receiving nutritious meals. Please let me know if you have any questions, and thank you for your hospitality during this 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	\$47.00
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$0

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **April 25, 2025** to Amy Dixon Banire at Amy.DixonBanire@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
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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
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This institution is an equal opportunity provider.