



ARIZONA DEPARTMENT OF EDUCATION

HNS # 04-2025

Original Signed

MEMORANDUM

To: School Food Authorities Operating the National School Lunch Program

From: Melissa Conner, Deputy Associate Superintendent
Arizona Department of Education, Health and Nutrition Services Division

Date: March 26, 2025

Subject: Implementation of the 5-Year NSLP Administrative Review Cycle

The United States Department of Agriculture (USDA) published a [final rule on child nutrition program integrity](#), which outlined the option for a 5-year NSLP administrative review cycle. This change aims to reduce the administrative burden for State agencies and School Food Authorities (SFAs) while maintaining program integrity by concentrating efforts on high-risk SFAs.

All SFAs operating the National School Lunch Program (NSLP) will receive an administrative review within 5 program years of their previous administrative review. In addition to the full administrative review, SFAs that met any high-risk criteria in their most recent NSLP administrative review will receive a targeted follow-up NSLP review within 2 years focusing on the specific high-risk findings. Please note that any SFA may receive a full NSLP administrative review sooner than five years after the previous administrative review if the State agency determines it necessary.

The Arizona Department of Education Health and Nutrition Services has developed a system to identify high-risk SFAs based on the following criteria:

- Certification/benefit issuance error rate exceeding 10%;
- Systemic meal counting and claiming violations;
- Systemic meal pattern violations;
- Missing meal component(s) at lunch;
- Incomplete verification; or
- Unallowable costs paid for by the nonprofit school food service account

SFAs that fail to provide sufficient documentation to demonstrate compliance in any areas listed above during an administrative review will be classified as high-risk.

Tom Horne, Superintendent of Public Instruction

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To ensure compliance with Child and Adult Care Food Program review requirements, SFAs participating in At-Risk Afterschool Meals (At-Risk) will continue to undergo reviews of their At-Risk operations every three years. If the At-Risk review coincides with the NSLP administrative review, both will be conducted simultaneously. However, if the At-Risk review falls in a different year from the NSLP administrative review, it will be conducted separately.

If you have questions or concerns regarding this memo, please contact your assigned Health and Nutrition Services Specialist or submit a request for service through HelpDesk by using the link: <https://helpdeskexternal.azed.gov/>.

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