



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Antelope Union High School District
CTD: 14-05-50
Site: Antelope Union High School

Contacts: Micheal Deiana, Superintendent and Robin Rinehart, Food Service Director

Review Date: March 19, 2025

Exit Conference Date: March 19, 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
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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	Fluid milk was not available in at least two varieties at breakfast during the review period. Specifically, 2% milk was served during the entire month of review. This was not a repeat finding from the previous cycle and therefore did not contribute 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 allowable varieties. Additionally, please provide written assurance that fluid milk will always be available in at least two allowable varieties at breakfast.</i>
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Performance Standard 2: Dietary Specifications and Nutrient Analysis – Critical Area

No findings.

Meal Access & Reimbursement: Certification and Benefit Issuance

2	An individual separate from the application approval process has not been designated as the hearing official.	Discussed that the hearing official must be an individual who was not involved in determining the eligibility under appeal. Additionally discussed appropriate school officials who could be designated. Referred to Hearing Procedure 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.	<i>Please provide the name and title of the individual designated as the hearing official. Additionally, please provide documentation to demonstrate where households are notified of the hearing official.</i>
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Meal Access & Reimbursement: Verification

No findings.

Meal Access & Reimbursement: Meal Counting and Claiming

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| 3 | Daily edit checks are not being conducted appropriately. Specifically, the attendance factor on the daily edit check does not match the attendance factor on the monthly reimbursement claim. | 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 https://www.azed.gov/hns/nslp/forms under the Operational accordion. The Step-by-Step Instruction: How to Complete Daily Edit Checks 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 completed daily edit check worksheet for the most recently submitted claim month. Additionally, please provide written assurance that the attendance factor reflected on the daily edit check worksheet will be updated annually.</i> |
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Meal Pattern & Nutritional Quality: Offer Versus Serve

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| 4 | Cafeteria staff have not been properly trained on Offer versus Serve (OVS) meal service. | Discussed that schools are expected to conduct training for point of service and serving line staff so they can help students select the required food components/food items in the quantities needed for reimbursable lunches and breakfasts. Additionally discussed that this could be included in the annual training requirements for program staff. Referred to USDA's Offer Versus Serve Manual located on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion. | <i>Please provide a written description of how cafeteria staff will be trained on OVS. Additionally, the certificate of completion of Meal or No Meal must be submitted.</i> |
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Meal Pattern & Nutritional Quality: Meal Components and Quantities

No findings.

Resource Management

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| 5 | Non-reimbursable meals are provided free of charge to students without a process in place to accurately record the number of non-reimbursable meals served. | Discussed that the cost of providing non-reimbursable meals to students must be covered using non-Federal funds (e.g., student payment, general fund, principal's account, angel fund, etc.). | <i>Please provide a written description of how non-reimbursable meals will be recorded. Additionally, please provide a written policy for how the cost of non-reimbursable meals provided free of charge will be covered using non-Federal funds, including the funding source.</i> |
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General Program Compliance: Civil Rights

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| 6 | Procedures for receiving and processing complaints alleging discrimination within the school meal programs are not in place. | 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. | <i>Please provide a written description of the process and procedures for processing complaints alleging discrimination within Federal School Meal Programs. Additionally, the certificate of completion of Step-by-Step Instruction: How to File a Civil Rights Complaint must be submitted.</i> |
| 7 | Sufficient documentation to support accommodations for special diets has not been maintained. Specifically, there is no form made available to accommodate students with dietary needs that deviate from meal pattern requirements. | Discussed requirements for accommodating special diets and the need for sufficient documentation. Referred to Medical Statement for Students with Special Dietary Accommodations found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational accordion. Additionally, referred to Accommodating Children with Disabilities in the School Meal Program found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion. Step-by-Step Instruction: How to Complete the Medical Statement for Students with Special Dietary Accommodations 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 maintaining documentation supporting accommodations for special dietary needs. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete the Medical Statement for Students with Special Dietary Accommodations must be submitted.</i> |

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| 8 | Documentation to support that program staff have been trained on civil rights topics has not been maintained. | Discussed that program staff must complete annual civil rights training that includes the following topics: collection and use of data; effective public notification systems; complaint procedures; compliance review techniques; resolution of noncompliance; requirements for reasonable accommodation of persons with disabilities; requirements for language assistance; conflict resolution; and customer service. Additionally discussed that documentation of annual training must be maintained for a minimum of five years. Online Course: Civil Rights Compliance for Child Nutrition Operators can be found on ADE's website at https://www.azed.gov/hns/civilrights . | <i>Please provide documentation to support that all program staff have completed appropriate civil rights training. Additionally, please provide written assurance that all food service staff will be trained at hire and as needed on civil rights compliance in Child Nutrition Programs on an annual basis.</i> |
| 9 | The "And Justice for All" poster was not displayed in a prominent location and was not visible to all program participants. | Discussed requirements of where poster must be placed and where to find a printable "And Justice For All" poster on ADE's website at https://www.azed.gov/hns/civilrights . Referred to HNS 08-2019 USDA Nondiscrimination And Justice for All Poster Clarification. | <i>Correction was made during on-site visit, and no further action is needed.</i> |

General Program Compliance: SFA On-Site Monitoring

Not applicable.

General Program Compliance: Local Wellness Policy

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| 10 | 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

Not applicable.

General Program Compliance: Professional Standards

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| 11 The School Nutrition Program Director did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed. | Discussed 12 hour 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. | <i>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 Director 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.</i> |
| 12 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. | <i>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.</i> |
| 13 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. | <i>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.</i> |

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| 14 | Professional Standards training hours are not being tracked on an annual basis. | Referred to USDA's Professional Standards Training Tracker Tool and to ADE's Training Tracking forms found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Professional Standards accordion. Additionally discussed ability to create a custom training tracker with all required elements. 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. | <i>Please provide the tracker that will be used to track Professional Standards training hours on an annual basis for all School Nutrition Program staff. Additionally, please provide written assurance that Professional Standards training hours will be tracked for all School Nutrition Program staff on an annual basis.</i> |
| 15 | The School Nutrition Programs director has not completed annual training on Federal procurement standards. 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 has not completed annual training on Federal procurement standards. Additionally, please provide written assurance that annual training on Federal procurement standards will be completed annually.</i> |

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

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| 16 | 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>Please provide a written description of where the food safety plan is located at. Additionally, please provide written assurance that a copy of the written food safety plan will be accessible to staff during meal preparation and service at each site.</i> |
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| <p>17 The following products observed at Antelope Union High School was in violation of the Buy American Provision (i.e., were non-domestic) and documentation justifying a Buy American exception were not maintained on file for Bananas served during the month of the review.</p> | <p>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.</p> | <p><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></p> |
| <p>18 The most recent food safety inspection report was not posted in a prominent location visible to all program participants.</p> | <p>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.</p> | <p><i>Please provide a photo demonstrating that the most recent food safety inspection report has been posted in a location where the program participants can view it. Additionally, please provide written assurance that it will be updated each time the school receives a food safety inspection.</i></p> |

General Program Compliance: Reporting and Recordkeeping

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| <p>19 Records have not been retained for 5 years after the final claim for reimbursement for the fiscal year has been submitted or until resolution of any audits. Specifically, production records for the entire month of review were not maintained.</p> | <p>Discussed that Arizona has a retention requirement of 5 years for documentation relating to Federal programs. Additionally discussed that documentation must be retained until the resolution of any audits.</p> | <p><i>Please provide a written policy describing the retention procedures that will be implemented.</i></p> |
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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, Antelope Union High School District has 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 online 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 \$0.00
 No- NSLP Yes- NSLP \$0.00

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **May 6, 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

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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