



Arizona Department of Education Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Beaver Creek Elementary District

CTD: 13-03-26

Site(s): Beaver Creek School

Contacts: Karin Ward, Superintendent; Karen DuFresne, Food Service Director

Review Date: April 27, 2022

Review Period: March 2022

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 & Benefit Issuance - Critical Area

Not Applicable

Performance Standard 1: Meal Counting & Claiming - Critical Area

1	Meal count totals for the month of review were not correctly combined and recorded at breakfast and lunch. This was deemed a non-systemic error 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.	<i>Please provide a written description of changes to the system that have been implemented to ensure that meal service lines provide an accurate count by eligibility category.</i>
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Performance Standard 2: Meal Components & Quantities - Critical Area

2	Portion sizes observed during the month of review did not meet minimum amounts required by the breakfast meal pattern. Specifically, on 3/7/22, the breaded ham, cheese, and egg bar crediting as 0.25 ounce equivalents grain and 1.0 ounce equivalents meat/meat alternate were served. Meat/meat alternates may not be counted toward the grain component until after the minimum daily grains requirement (1.0 ounce equivalents) is offered.	Discussed potential changes that could be made to ensure it doesn't continue (i.e., offering a grain that credits as at least 1.0 ounce equivalent). Meal pattern requirements for the National School Breakfast Program can be found on ADE's website at http://www.azed.gov/hns/nslp under the Meal Pattern tab. The Step-by-Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).	<i>Please provide one week of breakfast production records which demonstrates that at least 1.0 equivalent of grains was offered prior to crediting Meat/Meat Alternates toward the grain component. Additionally, please provide a written description of the changes that have been made to ensure that at least 1.0 ounce equivalent of grain will be offered prior to crediting Meat/Meat Alternates toward the grain component. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Breakfast Menu must be submitted.</i>
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| <p>3 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the weekly minimum grain requirement was not met at breakfast. This was not a repeat finding from the previous cycle and did not contribute 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. Meal pattern requirements for the National School Breakfast Program can be found on ADE's website at http://www.azed.gov/hns/nslp under the Meal Pattern tab. The Step-by-Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that weekly grain quantities meet minimum amounts required by the meal pattern.</i></p> |
| <p>4 The following vegetable subgroup was not offered during the review period: beans/peas. This was determined to be a repeat finding from the previous cycle and contributed toward fiscal action calculations.</p> | <p>Discussed vegetable subgroup requirements for the age/grade groups served. Vegetable Subgroup Quick Guide can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab. 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 tab. Please note that repeated violations involving vegetable subgroups may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Please provide one week of lunch production records which demonstrate compliance with the vegetable subgroups. Additionally, please provide written assurance that moving forward, all menus will be planned to meet the vegetable subgroup requirements. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.</i></p> |
| <p>5 Recipes provided did not contain all required sections: spaghetti with meat sauce. As a result spaghetti meat sauce could not be credited towards the meal pattern. Therefore, it could not be determined if the meat/meat alternate minimum daily and weekly requirement was met. This was determined to be a repeat finding from previous cycle and contributed toward fiscal action calculations.</p> | <p>Discussed all menu items that contain more than one ingredient must have a standardized recipe. Standardized recipes must include the following information: recipe name, recipe number, ingredients and amounts, serving size, recipe yield, preparation instructions, HACCP process, and HACCP instructions. Standardized Recipes Template can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Meal Pattern tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Please provide an updated recipe for spaghetti meat sauce. Additionally, please provide written assurance that all recipes will be updated with accurate ingredient quantities, number of servings, and serving sizes.</i></p> |

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| <p>6 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the weekly minimum grain requirement was not met during the review period. This was determined to be a repeat finding from 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. 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 tab. 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 tab. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that grain quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu.</i></p> |
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Performance Standard 2: Dietary Specifications & Nutrient Analysis - Critical Area

No findings

Meal Access & Reimbursement: Certification & Benefit Issuance

Not applicable

Meal Access & Reimbursement: Verification

Not applicable

Meal Access & Reimbursement: Meal Counting & Claiming

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| <p>7 Daily edit checks are not being conducted.</p> | <p>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 tab. 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 tab.</p> | <p><i>Please provide a completed daily edit check worksheet for the month of April. 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></p> |
| <p>8 The site application in CNPWeb does not accurately reflect the point of service and counting and claiming procedures. Specifically, the site applications indicate 5 operating days per week while the site is operating 4 days per week.</p> | <p>Advised SFA to update site application in CNPWeb and contact their assigned specialist to let them know of the changes.</p> | <p><i>Please submit a new site application in CNPWeb that accurately reflects the point of service and counting and claiming procedures. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i></p> |

9 The Free and Reduced-Price Policy Statement provided by the SFA does not reflect current practices and procedures observed on-site. Specifically, the FRPPS was not updated to reflect new staff.	Referred them to FRPPS template on ADE's website at website at https://www.azed.gov/hns/nslp/forms under the Organizational tab.	<i>Please provide an updated and signed Free and Reduced-Price Policy Statement. Additionally, please provide written assurance that moving forward, the Free and Reduced Price-Policy Statement will reflect current practices.</i>
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Meal Pattern & Nutritional Quality: Offer Versus Serve

No findings

Meal Pattern & Nutritional Quality: Meal Components & Quantities

10 Milk substitutions did not meet requirements. Specifically, water or juice was used as milk substitutes for students without documented special dietary accommodation requests.	Provided nutrient requirements for milk substitutes and discussed options for meal service. Q&As - Milk Substitution for Children with Medical or Special Dietary Needs (Non-Disability) can be found on FNS website at http://www.fns.usda.gov/qas-milk-substitution-children-medical-or-special-dietary-needs-non-disability/ .	<i>If planning to continue offering a fluid milk substitute, please provide a copy of the Nutrition Facts label of the product that will be used that meets the nutrition requirements. If a fluid milk substitute will no longer be offered, please provide a written description of procedures that will be implemented to ensure only complete meals will be counted for reimbursement.</i>
11 Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast.	Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab.	<i>Please provide the sign that will be displayed to students that demonstrates what constitutes a reimbursable meal at breakfast. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i>

Resource Management

No Findings

General Program Compliance: Civil Rights

12 The public/media release was not provided to local media, the unemployment office and local employers considering large layoffs.	Discussed schools operating SSO must provide public notification regarding the availability of school meals and the eligibility criteria at or near the beginning of the school year. For SY 2021-2022, schools participating in SSO should notify households that meals will be offered free through SSO. Referred to HNS 17-2021 & SP 15-2021 (Q10). Additionally, referred to the template release that can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Outreach tab.	<i>Please provide written procedures for distributing the public/media release and written assurance that the public/media release will be submitted to the local media, the unemployment office and local employers considering large layoffs prior to the start of each school year.</i>
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- 13 Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, the contact information for sending complaints to ADE was not accurate.
- Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., SA, FNSRO, 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 tab.
- 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.*
- 14 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 diverge 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 tab. 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 tab. 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 tab.
- Please provide written procedures for maintaining documentation supporting accommodations for special diets and written assurance that sufficient documentation to support accommodations for special diets will be maintained. 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.*

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| 15 | The Civil Rights Compliance form was not completed correctly. Specifically, the race data chart did not include all enrolled students. | Discussed requirement for completing form and how to collect racial/ethnic data from program participants. The form can be found on ADE's website at https://www.azed.gov/hns/civilrights . The Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library tab. | <i>Please provide written assurance that the Civil Rights Compliance form will be completed by December 15 each year and kept on file for 5 years. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form must be submitted.</i> |
| 16 | The "And Justice for All" poster displayed in the cafeteria was not the most recent version. | 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>A new poster was provided and displayed during the on-site review. Please provide written assurance that the "And Justice For All" poster has been displayed in a prominent location and visible to all program participants.</i> |

General Program Compliance: SFA On-Site Monitoring

Not Applicable

General Program Compliance: Local Wellness Policy

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| 17 | The Local Wellness Policy (LWP) did not contain goals for nutrition promotion. | Discussed feasible options for nutrition promotion goals that can be written into the LWP. Discussed activity ideas which included offering contests, surveys, promotions and/or taste testing, providing information to families to encourage consumption of healthy foods at home, and displaying nutrition and health posters throughout campus. Team Nutrition Resources can be found at http://www.teamnutrition.usda.gov/ . 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 Tab. | <i>None required at this time.</i> |
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18 The Local Wellness Policy (LWP) did not contain policies for food and beverage marketing.	Discussed updating the LWP 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 Tab.	<i>None required at this time.</i>
19 The public is not being notified of the existence and contents of the Local Wellness Policy (LWP).	Discussed feasible means of notifying the public about the LWP. 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 Tab.	<i>None required at this time.</i>

General Program Compliance: Competitive Food Services

Not applicable

General Program Compliance: Professional Standards

20 The School Nutrition Program Director hired after July 1, 2015 did not meet the hiring standard requirement.	Referred to hiring standard requirements and discussed with appropriate district HR/school staff. 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 Courses tab.	<i>Please work with your program specialist to request an approval letter for LEAs with less than 500 students to hire a candidate that meets the educational standards but has less than three years experience.</i>
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General Program Compliance: Water

No findings

General Program Compliance: Food Safety, Storage and Buy American

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| 21 | The written food safety plan was not site specific and did not include adequate SOPs for serving meals in the classroom. | Discussed sample SOPs and guidelines for Critical Control Points (CCPs) found in USDA's Guidance on creating a Food Safety can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Food/Health Safety tab. | <i>Please provide an updated food safety plan including a copy of the SOPs and CCPs found in the written food safety plan for serving meals in the classroom.</i> |
| 22 | The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools or at off-site storage facilities: mandarin oranges (China) and fruit cocktail (China). Additionally, documentation justifying a Buy American exception was not maintained/on file. | Discussed the Buy American provision requirements and procedures to ensure compliance. Referred to SP38-2017, Buy American Webinar and FAQ. Funds used from the non-profit food service account must be used to procure food products that comply with the Buy American Provision. 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 tab. 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 tab. | <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> |
| 23 | The most recent food safety inspection report was not posted in a prominent location and was not visible to all program participants. | Discussed making copies of most recent report and feasible places for posting. | <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 specify where the report has been posted.</i> |
| 24 | Storage violations were observed. Specifically, food is not stored 6 inches off the floor. Specifically, boxes of food were on the floor in the dry storage area and the walk-in freezer. | Discussed specific violations and feasible solutions. Referred to Arizona's School Food Safety Guidance found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Food/Health Safety tab. Additionally, discussed Food Safety Online Courses can be found on ICN's website at https://theicn.org/icn-resources-a-z/food-safety/ . | <i>Please provide a written description of the changes that have been made to correct the storage violations found.</i> |

General Program Compliance: Reporting & Recordkeeping

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| 25 | Breakfast and lunch production records provided do not indicate different portion sizes for different grade groupings. Specifically, a separate production record is not being completed for meals served to pre-school students. | Discussed using Production Record for Multiple Grade Groupings found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab. Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library tab. | <i>Please provide copies of completed breakfast lunch production records for meals served to pre-school students for 4 consecutive days. Additionally, the certificate of completion of Production Record Overview must be provided.</i> |
| 26 | Production record crediting information was not accurate for the following breakfast menu items: diced pears, diced peaches, applesauce, mandarin oranges, breakfast combo bar | Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Crediting resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab. | <i>Please provide updated production records with accurate crediting.</i> |
| 27 | Production record crediting information was not accurate for the following lunch menu items: spaghetti sauce with beef, WG spaghetti pasta, WG PB&J sandwich, beef crumbles (beef fajitas), WG flour tortilla, flamebroiled patties, cheese pizza | Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Crediting resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab. | <i>Please provide updated production records with accurate crediting.</i> |
| 28 | Production records were not completed accurately for the At-Risk supper program during the review period. Specifically, the production records did not accurately reflect the vegetable items served. Additionally, production record crediting information was not accurate for the following supper menu items: bagged baby carrots and breakfast stick. | Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Crediting resources can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning tab. | <i>Please provide updated production records with accurate crediting. Additionally, please provide written assurance that production records will accurately reflect the menu items served.</i> |

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

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| 29 | Outreach to families regarding the availability of the School Breakfast Program (SBP) was not conducted at the beginning of or during the school year. | Discussed methods of notifying families of the availability of the SBP at the start of and throughout the school year. Additionally, discussed SBP reminders must include: serving times, locations where breakfast is available, and SBP costs. | <i>Please provide documentation that demonstrates how households are notified of the availability of the SBP at the beginning of and during the school year. Additionally, please provide a written description of how households will be notified of the availability of the SBP at the beginning of and during the school year, and written assurance that this will occur.</i> |
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30 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 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/>.

Please provide a description of how households will be notified of the availability of the SFSP prior to the end of the school year and written assurance that this will occur. If you do not plan to operate the SFSP and no other entities reasonably close to your site operate the SFSP, please provide a description of other community resources that will be provided to households prior to the end of the school year.

Other Federal Program Reviews: Afterschool Snack Program

Not applicable

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2022 if applicable.

Other Federal Program Reviews: Fresh Fruit & Vegetable Program

Not applicable

Other Federal Program Reviews: Special Milk Program

Not applicable

Other Federal Program Reviews: At-Risk Afterschool Meals

31 Production records do not support that the At-Risk Afterschool Meals served meet meal pattern requirements. Specifically, the minimum daily vegetable requirement was not met on 3/7/22, 3/8/22, 3/9/22, and 3/10/22. Additionally, the daily minimum meat/meat alternate requirement was not met on 3/10/22.

Discussed the meal pattern requirements of At-Risk Afterschool Meals. The meal pattern table can be found on ADE's website at <https://www.azed.gov/hns/afterschool> under the Meal Pattern tab. Step-by-Step Instruction: How to Plan a Snack Menu for the Afterschool Care Snack Program OR Step-by-Step Instruction: How to Plan a Supper Menu Using the NSLP Meal Pattern OR Step-by-Step Instruction: How to Plan a Supper Menu Using the CACFP Meal Pattern can be found on ADE's website at <https://www.azed.gov/hns/afterschool/trainingforSFAs> under the How-To Guides tab.

Please provide copies of completed At-Risk Afterschool Meals production records for 4 consecutive days. Additionally, please provide written assurance that the At-Risk Afterschool Meals meal pattern will be adhered to at all times. Additionally, the certificate of completion for Step-by-Step Instruction: How to Plan a Supper Menu Using the CACFP Meal Pattern must be provided.

Comments/Recommendations:

Congratulations- Beaver Creek Elementary District has completed the Administrative Review for SY2021-2022! Thank you for your hard work and hospitality during the review process. Your care towards providing safe and healthy meals to your students is evident!

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?

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| <input checked="" type="checkbox"/> No- SBP | <input type="checkbox"/> Yes- SBP | \$0 |
| <input type="checkbox"/> No- NSLP | <input checked="" type="checkbox"/> Yes- NSLP | \$4,859.06 |
| <input checked="" type="checkbox"/> No- SSO SBP | <input type="checkbox"/> Yes- SSO SBP | \$104.20 |
| <input checked="" type="checkbox"/> No- SSO NSLP | <input type="checkbox"/> Yes- SSO NSLP | \$0 |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by June 24, 2022 to Noelle Yeo at Noelle.Yeo@azed.gov.



6/17/2022

Reviewer Signature

Date



6/17/2022

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 on the National School Lunch Program Administrative Review tab on the ADE website.

Equity for all students to achieve their full potential
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This institution is an equal opportunity provider