



Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Sonoita Elementary District

CTD: 12-04-25

Site: Elgin Elementary School

Contacts: Heidi Gonzales, Business Manager and Melissa Paul, Office Manager

Review Date: February 28, 2023

Review Period: January 2023

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			
1	Two applications were certified incorrectly. Specifically, two applications were miscategorized resulting in four student eligibility errors. This contributed toward fiscal action calculations.	Discussed errors found and required corrective action. Referred to Processing Applications, Reviewing Applications Based on Income, Assessing Completeness of Categorically Eligible Applications, Determining Eligibility for Categorically Eligible Applications section(s) 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. Required -OR- Suggested completing the training: Step-by-Step Instruction: How to Process Household Applications found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Corrections have been made to certification errors. Please describe the process that will be implemented to reduce the amount of errors that occur while determining the eligibility status for each student. Additionally, the certificate of completion of Step-by-Step Instruction: How to Process Household Applications must be submitted.</i>
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 breakfast. This is not a repeat finding from previous cycle and 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 and 1% unflavored. Please note that repeated violations involving milk requirements may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents). | <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> |
| 3 Fluid milk was not available in at least two varieties at lunch. This is not a repeat finding from previous cycle and 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 and 1% unflavored. Please note that repeated violations involving milk requirements may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents). | <i>Please provide one week of lunch 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 lunch.</i> |
| 4 The following products could not be credited towards the meal pattern due to insufficient documentation: Pancakes & Sausage. Without sufficient documentation, the reviewer was unable to determine if the quantity requirements were met. This was determined to be a repeat finding from the previous cycle and contributed towards fiscal action calculations. | Discussed requirements regarding processed product documentation and provided examples. USDA Food Fact Sheets can be found on USDA's website at https://www.fns.usda.gov/fdd/nsfp-usda-foods-fact-sheets/ . The CN Labels and Product Formulation Statements Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nsfp/training under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents). | <i>Please provide a Child Nutrition (CN) label and/or Product Formulation Statement (PFS) for Pancakes & Sausage. If unable to provide a CN label or PFS, please provide written assurance that the product will no longer be offered/served to students. Additionally, please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation. Additionally, the certificate of completion of CN Labels and Product Formulation Statements must be provided.</i> |

<p>5 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, insufficient daily grain quantities were served at breakfast on 1/13/23; 0.25 ounce equivalents (oz eq) grain was credited toward the meal pattern as served when 1.0 oz eq grain is required daily. 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. 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. 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 accordion. 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 accordion. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).</p>	<p><i>Please provide a written description of the changes that have been made to ensure that daily grain quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Breakfast Menu must be submitted.</i></p>
<p>6 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, insufficient weekly grain quantities were served at lunch; 7.75 ounce equivalents (oz eq) grain was documented as served when 8.0 oz eq grain is required weekly. 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 reevaluating Product Formulation Statements and weekly oz eq of grains. 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. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 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. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.</i></p>

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

No Findings.

Meal Access & Reimbursement: Certification and Benefit Issuance

- | | | | |
|---|---|--|---|
| 7 | The benefit issuance document is not being updated in a timely manner to reflect changes in eligibility. Specifically, the date of approval a household application is certified and the Decision Date on benefit issuance document are inconsistent. | Discussed potential changes that can be made to system to ensure that updates are made in a timely manner. The Step-by-Step Instruction: How to Create a Benefit Issuance Document (BID) can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion. | Please provide a benefit issuance document that demonstrates timely updates, such as changes in eligibility, new students or withdrawn students. Additionally, please provide written assurance that moving forward, all updates will occur in a timely manner. Additionally, please provide the certificate of completion for Step-by-Step Instruction: How to Create a Benefit Issuance Document (BID) must be submitted. |
|---|---|--|---|

Meal Access & Reimbursement: Verification

- | | | | |
|---|---|---|--|
| 8 | An error-prone application was not selected for verification. Additional applications were determined to be error-prone during review and should have been subjected to Verification. | Discussed requirement of selecting from error-prone applications and potential methods of identifying them. Referred to Error-Prone Worksheet found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Eligibility Documents for School Meal Benefits accordion. The Step-by-Step Instruction: How to Identify Household Applications That Are Error-Prone 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 error-prone applications will be identified and written assurance that applications to be verified will be selected from error-prone applications. Additionally, the certificate of completion of Step-by-Step Instruction: How to Identify Household Applications That Are Error-Prone must be submitted. |
|---|---|---|--|

Meal Access & Reimbursement: Meal Counting and Claiming

- | | | | |
|---|--|---|--|
| 9 | 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 claims. | 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 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. | Please provide a completed daily edit check worksheet for the month of [month requested]. 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. |
|---|--|---|--|

Meal Pattern & Nutritional Quality: Offer Versus Serve

No Findings.

Meal Pattern & Nutritional Quality: Meal Components and Quantities

No Findings.

Resource Management

No Findings.

Procurement

No Findings.

General Program Compliance: Civil Rights

- | | | | |
|----|--|--|---|
| 10 | The USDA nondiscrimination statement used on program materials is not the most current USDA statement. Specifically, the Notification of Benefits Letter and Direct Certification Notification of Eligibility did not contain the most current nondiscrimination statement due to older versions being utilized. | 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 program material with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i> |
| 11 | The USDA nondiscrimination statement was not printed on appropriate program materials. Specifically, the Meal Charge Policy does not contain the long discrimination 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 program material with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i> |
| 12 | The USDA nondiscrimination statement used on program materials is not the most current USDA statement. Specifically, the menus contain the incorrect short 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 program material with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i> |

General Program Compliance: SFA On-Site Monitoring

Not Applicable.

General Program Compliance: Local Wellness Policy

- | | | | |
|----|--|--|---|
| 13 | The Local Wellness Policy (LWP) did not contain all required elements. Specifically, the LWP did not contain nutrition guidelines for all foods and beverages sold to students on the school campus during the school day. | Discussed developing a LWP with nutrition guidelines for all foods and beverages sold to students that meet Federal regulations. 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 description of the changes that will be made to the LWP to meet the requirements for nutrition guidelines for all food and beverages sold to students. The description should include draft language, who will be involved in updating the LWP and the date the update is expected to be completed.</i> |
| 14 | The review and update of the Local Wellness Policy (LWP), as specified in the policy itself, is not occurring nor is documentation being kept on file to support this. | Discussed why the review and update is not occurring and what can be done to ensure this occurs as specified in the LWP. Discussed maintaining records to document compliance. 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 description of how the LWP will be reviewed and updated as well as how reviews and updates will be documented.</i> |

15	The public was not notified of the results of the most recent assessment of the implementation of the Local Wellness Policy (LWP).	Discussed requirement to make the most recent assessment available to the public. Also discussed feasible means for notifying the public of the results of the most recent assessment on the implementation of the LWP. The USDA's Local Wellness Policy Outreach Toolkit can be found at https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit .	<i>Please provide the notification provided to the public of the results of the most recent assessment of the implementation of the LWP. Additionally, please provide written assurance that the public will be notified of results each time the LWP is assessed.</i>
----	--	---	--

General Program Compliance: Competitive Food Services

No Findings.

General Program Compliance: Professional Standards

16	Employees were not appropriately categorized per Professional Standards definitions. Specifically, core duties/responsibilities are not being identified in tracker.	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.	<i>Please provide a written description of how it will be ensured that employees are appropriately categorized per Professional Standards definitions. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i>
17	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. Specifically, 8 hours were completed but no additional plans in place to meet the remaining hours were in place.	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.	<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 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.</i>

18	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. Specifically, 8 hours were completed but no additional plans in place to meet the remaining hours were in place.	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>
----	--	---	---

General Program Compliance: Water

No Findings.

General Program Compliance: Food Safety, Storage and Buy American

19	Storage violations were observed. Specifically, meats were stored above fresh produced.	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 accordion. Additionally, discussed Food Safety Online Training Library 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 and Recordkeeping

20	The site application in CNPWeb indicated that SFA is not implementing Offer versus Serve (OVS) during lunch when the SFA is implementing during lunch.	Discussed steps required to update the site application in CNPWeb to reflect current meal service of OVS during lunch.	<i>Please provide a copy of the resubmitted site application indicating that OVS implemented during lunch. Additionally, please provide written assurance that the site application in ADE's CNPWeb will accurately reflect current practices.</i>
----	--	--	--

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

No Findings.

Other Federal Program Reviews: Afterschool Snack Program

Not Participating.

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2023 if applicable.

Other Federal Program Reviews: Fresh Fruit and Vegetable Program

Not Participating.

Other Federal Program Reviews: Special Milk Program

Not Participating.

Other Federal Program Reviews: At-Risk Afterschool Meals

Not Participating.

Comments/Recommendations:

Congratulations! Sonoita Elementary District has completed the administrative review for the 2022-2023 school year. Thank you for your hospitality, organization, and sense of urgency during the review process. Your team works together in order to implement the School Nutrition Programs. It is evident that you are working hard to ensure your students are fed healthy, delicious meals in a supportive environment.

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	\$81.02
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$208.70

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by July 31, 2023 to Joyce Benally at Joyce.Benally@azed.gov.

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.

www.azed.gov – (602) 542-8700 – 1535 West Jefferson Street • Phoenix, Arizona 85007 Bin # 7
This institution is an equal opportunity provider.