



**ARIZONA DEPARTMENT OF  
EDUCATION**

**Health and Nutrition Services Division**

**Administrative Review Summary Report**

School Food Authority Name: St. Peter Indian Mission School

CTD: 11-20-01

Site: St. Peter Indian Mission School

Contacts: Sister Martha Mary Carpenter, Principal; Virginia Ginger Ortiz-Olivarez, Manager

Review Date: October 30, 2023

Review Period: September 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**

Not applicable.

**Performance Standard 1: Meal Counting and Claiming – Critical Area**

No findings.

**Performance Standard 2: Meal Components & Quantities – Critical Area**

<p>1 Quantities observed on the review period did not meet minimum amounts required by the meal pattern. Specifically, on Monday 9/18/23 only 1/2c fruit was served instead of the 1c daily fruit requirement for breakfast for grades K-12. This was determined to be a systemic issue and resulted in an expanded review of the entire month of September 2023. 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 (e.g., changes in serving utensils, recipes, etc.). 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 <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a Breakfast Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar &amp; Webinar Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> 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 fruit daily 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>
---	--	---

- 2 Quantities observed on the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly 5c fruit requirement for breakfast for grades K-12 was not met. This was determined to be a systemic issue and resulted in an expanded review of the entire month of September 2023. This was determined to be a repeat finding from the previous cycle 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 (e.g., changes in serving utensils, recipes, etc.). 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides 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).
- Please provide a written description of the changes that have been made to ensure that fruit weekly quantities meet minimum amounts required by the meal pattern.*
- 3 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly 9oz eq grain requirement was not met for grades K-12 for breakfast. This was determined to be a systemic issue and resulted in an expanded review of the entire month of September 2023. This was determined to be a repeat finding from the previous cycle 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 (e.g., changes in serving utensils, recipes, etc.). 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides 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).
- 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.*

- |   |  |   |   |
|---|--|---|---|
| 4 | During the week of review, at least 80% of the grains served at breakfast and lunch were not whole grain rich for all grades K-12.   | Discussed whole grain-rich requirements. USDA's Whole Grain Resource for the National School Lunch and Breakfast Programs: A Guide to Meeting the Whole Grain-Rich Criteria can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning accordion.   | <i>Please provide one week of breakfast and lunch production records and supporting documentation (CN Label, PFS, ingredient lists, Nutrition Facts labels, etc.) that demonstrate that at least 80% of the grains served at breakfast and lunch were whole grain-rich.</i> |
| 5 | Quantities observed during the review period did not meet minimum amounts required by the 9-12 meal pattern. Specifically, daily 1c fruit requirement was not met on 9/18/23-9/21/23 for lunch, only 1/2c fruit was served. This was determined to be a systemic issue and resulted in an expanded review of the entire month of September 2023. This was determined to be a repeat finding from the previous cycle 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 (e.g., changes in serving utensils, recipes, etc.). 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 Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> 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 written description of the changes that have been made to ensure that fruit daily quantities meet minimum amounts required by the meal pattern.</i>   |

- 6 Quantities observed during the review period did not meet minimum amounts required by the 9-12 meal pattern. Specifically, weekly 5c fruit requirement was not met for lunch, only 3c fruit were served. This was determined to be a systemic issue and resulted in an expanded review of the entire month of September 2023. This was determined to be a repeat finding from the previous cycle 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 (e.g., changes in serving utensils, recipes, etc.). 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 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides 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).
- Please provide a written description of the changes that have been made to ensure that fruit weekly quantities meet minimum amounts required by the meal pattern.*
- 7 Quantities observed during the review period did not meet minimum amounts required by the 9-12 meal pattern for lunch. Specifically, only 1/2c daily vegetable was served on 9/19/23, 3/4c was served on 9/21/23 and 9/22/23 instead of the daily 1c requirement. This was determined to be a systemic issue and resulted in an expanded review of the entire month of September 2023. This was determined to be a repeat finding from the previous cycle 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 (e.g., changes in serving utensils, recipes, etc.). 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 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides 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).
- Please provide a written description of the changes that have been made to ensure that vegetable daily quantities meet minimum amounts required by the meal pattern.*

- 8 Quantities observed during the review period did not meet minimum amounts required by the 9-12 meal pattern for lunch. Specifically, weekly vegetable required was not met, only 3 7/8c vegetable were served instead of the required weekly 5c. This was determined to be a systemic issue and resulted in an expanded review of the entire month of September 2023. This was determined to be a repeat finding from the previous cycle 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 (e.g., changes in serving utensils, recipes, etc.). 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 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides 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).
- Please provide a written description of the changes that have been made to ensure that vegetable weekly quantities meet minimum amounts required by the meal pattern.*
- 9 Quantities observed on the review period did not meet minimum amounts required by the meal pattern for lunch. Specifically, weekly subgroup vegetable requirement was not met for dark green and starchy, only 1/4c was served instead of the required 1/2c for both subgroups for all grades K-12. This was determined to be a systemic issue and resulted in an expanded review of the entire month of September 2023. This was determined to be a repeat finding from the previous cycle 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 (e.g., changes in serving utensils, recipes, etc.). 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 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides 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).
- Please provide a written description of the changes that have been made to ensure that dark green and starchy vegetable subgroup weekly quantities meet minimum amounts required by the meal pattern.*

- 10 Quantities observed during the review period did not meet minimum amounts required by the 9-12 meal pattern for lunch. Specifically, only 1oz eq daily m/ma was served on 9/18/23, 9/20/23, and 9/22/23 instead of the required daily 2oz eq m/ma. This was determined to be a systemic issue and resulted in an expanded review of the entire month of September 2023. This was determined to be a repeat finding from the previous cycle 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 (e.g., changes in serving utensils, recipes, etc.). 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 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides 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).
- Please provide a written description of the changes that have been made to ensure that grain quantities meet minimum daily amounts required by the meal pattern.*
- 11 Quantities observed during the review period did not meet minimum amounts required by the 9-12 meal pattern for lunch. Specifically, weekly m/ma requirement was not met, only 7 oz eq was served instead of the required 10 oz eq m/ma. This was determined to be a systemic issue and resulted in an expanded review of the entire month of September 2023. This was determined to be a repeat finding from the previous cycle 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 (e.g., changes in serving utensils, recipes, etc.). 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 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides 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).
- Please provide a written description of the changes that have been made to ensure that meat/ meat alternate quantities meet weekly minimum amounts required by the meal pattern.*

- 12 Quantities observed during the review period did not meet minimum amounts required by the 9-12 meal pattern for lunch. Specifically, daily grain requirement was not met on 9/18/23 only 1.5oz eq was served and on 9/20/23 and 9/22/23 only 1oz eq grain instead of the required 2oz eq. This was determined to be a systemic issue and resulted in an expanded review of the entire month of September 2023. This was determined to be a repeat finding from the previous cycle 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 (e.g., changes in serving utensils, recipes, etc.). 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 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides 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).
- Please provide a written description of the changes that have been made to ensure that grain quantities meet minimum weekly amounts required by the meal pattern.*
- 13 Quantities observed during the review period did not meet minimum amounts required by the 9-12 meal pattern for lunch. Specifically, weekly grain requirement was not met, only 9oz eq was served instead of the required 10oz eq. This was determined to be a systemic issue and resulted in an expanded review of the entire month of September 2023. This was determined to be a repeat finding from the previous cycle 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 (e.g., changes in serving utensils, recipes, etc.). 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 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides 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).
- Please provide a written description of the changes that have been made to ensure that grain quantities meet minimum weekly amounts required by the meal pattern.*

- 14 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, only 1/4c vegetable was served instead of the 3/4c daily requirement on Tuesday 9/19/23 for grades K-8 for lunch. This was determined to be a repeat finding from the previous cycle 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 (e.g., changes in serving utensils, recipes, etc.). 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 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides 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).
- Please provide a written description of the changes that have been made to ensure that daily vegetable quantities meet minimum amounts required by the meal pattern.*



<p>15 Quantities observed on the review period did not meet minimum amounts required by the meal pattern. Specifically, weekly m/ma requirement was not met for grades K-8, only 7oz eq was served instead of the required 9oz eq for lunch. 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 (e.g., changes in serving utensils, recipes, etc.). 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 Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar &amp; Webinar Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> 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 meat/ meat alternate quantities meet weekly minimum amounts required by the meal pattern.</i></p>
--	--	--

---

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

---

No findings.

---

**Meal Access & Reimbursement: Certification and Benefit Issuance**

---

Not applicable.

---

**Meal Access & Reimbursement: Verification**

---

Not applicable.

---

**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**

---

<p>16 Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast and lunch.</p>	<p>Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning accordion.</p>	<p><i>Please provide the sign that will be displayed to students that demonstrates what constitutes a reimbursable meal at breakfast and lunch. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i></p>
---	---	--

---

**Resource Management**

---

- |  |  |  |
|--|--|--|
| 17 Documentation was not provided to support the usage of Supply Chain Assistance funds. | Discussed that the attestation statement signed by the SFA detailed that the SFA will use Supply Chain Assistance (SCA) funds only for purchasing unprocessed or minimally processed domestic food products and that SFAs are required to maintain purchasing and other related records for review and audit purposes. Referred to SP 03-2022: Allocation of Supply Chain Assistance (SCA) Funds to Alleviate Supply Chain Disruptions in the School Meal Programs located on ADE's website at <a href="https://www.azed.gov/hns/memos">https://www.azed.gov/hns/memos</a> . | <i>Please provide documentation demonstrating how the \$31,260.47 of Supply Chain Assistance funds were spent.</i> |
|--|--|--|

---

**Procurement**

---

- |  |  |   |
|--|--|---|
| 18 The SFA did not provide written codes of conduct for procurement within the program.  | Discussed that non-Federal entities must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award, and administration of contracts.   | <i>Please provide written codes of conduct that are consistent with 2 CFR 200.318.</i>  |
| 19 The SFA did not provide documented procurement procedures.  | Discussed that non-Federal entities must have and use documented procurement procedures, consistent with State, local, and tribal laws and regulations and the standards of the Code of Federal Regulations for the acquisition of property or services required under a Federal award or subaward. The non-Federal entity's documented procurement procedures must conform to the procurement standards identified in 2 CFR 200.317 through 2 CFR 200.327.  | <i>Please provide written procurement procedures that are consistent with 2 CFR 200.317 through 2 CFR 200.327.</i>  |
| 20 Small purchase procedures were not in compliance with procurement requirements. Specifically, no solicitation, evaluation, or award documentation was provided for the following small purchases: Shamrock Foods.             | Discussed that all procurement transactions for the acquisition of property or services required under a Federal award must be conducted in a manner providing full and open competition consistent with the standards of this 2 CFR 200.319 and 2 CFR 200.320. Additionally discussed that non-Federal entities must have written procedures for procurement transactions. These procedures must ensure that all solicitations incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. | <i>Please provide a written description of solicitation procedures that will be followed prior to making a small purchase including the title of the individual within the SFA responsible for conducting the solicitation for all small purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.</i> |
| 21 The SFA did not maintain oversight to ensure that contractors performed in accordance with the terms, conditions, and specifications of their contracts or purchase orders for the following small purchases: Shamrock Foods. | Discussed that non-Federal entities must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.   | <i>Please provide a written description of the processes implemented to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.</i>  |

- |    |  |  |  |
|----|--|--|--|
| 22 | The SFA did not maintain oversight to ensure that food purchases complied with the Buy American provision for the following small purchases: Shamrock Foods and Sams.  | Discussed that the non-Federal entity should, to the greatest extent practicable under a Federal award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States. Domestic preferences for procurements must be included in all subawards including all contracts and purchase orders for work or products. | <i>Please provide a written description of the processes implemented to ensure sufficient oversight with Buy American compliance when making small purchases.</i>  |
| 23 | The SFA did not submit documentation of a performed cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold. Specifically, a cost or price analysis documentation was not provided for the following goods/services: Ecolabs. | Discussed that a cost or price analysis must be performed for every procurement action in excess of the Simplified Acquisition Threshold, including contract modifications, before receiving bids or proposals. A price analysis will be used to determine the reasonableness of the proposed contract price.  | <i>Please provide a written description of the procurement procedures that will be implemented for conducting the cost or price analysis prior to any formal procurement action. Additionally, please provide written assurance that all records will be maintained for 5 years.</i> |

---

**General Program Compliance: Civil Rights**

---

- |    |   |  |   |
|----|---|--|---|
| 24 | The current USDA nondiscrimination statement was not present on all appropriate program materials. Specifically, the most current statement was not printed on the posted menus and the statement was missing from the Local Wellness Policy. | Discussed where to find nondiscrimination statement on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> 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**

---

- |    |  |   |  |
|----|--|---|--|
| 25 | A recent assessment of the implementation of the Local Wellness Policy (LWP) has not been conducted. | Discussed requirement to complete an assessment once every three years, at a minimum. The assessment must measure how the LEA is complying with their LWP, how the LEA's LWP 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Local Wellness Policy accordion. Local Wellness Policy Assessment: Making it Meaningful Webinar can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training accordion. | <i>Please provide a written plan for conducting an assessment of the implementation of the LWP. 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**

---

- 26 The School Nutrition Program Director hired after July 1, 2015 did not complete the required 8 hours of food safety training within 30 days of being hired or within 5 years prior to hire date. Discussed requirement and feasibility for attending an available certification training within current school year. Food Safety Online Training Library can be found on ICN's website at <https://theicn.org/icn-resources-a-z/food-safety/>. *Please provide the expected date that food safety certification training will be completed by the School Nutrition Program Director.*

---

**General Program Compliance: Water**

---

No findings.

---

**General Program Compliance: Food Safety, Storage and Buy American**

---

- 27 Documentation was not maintained to support that the school received two food safety inspections from the local health department each school year, or that the school requested two food safety inspections each year from the local health department. Discussed that each site operating must obtain two food safety inspections from the local health department per school year or maintain documentation to show that two food safety inspections were requested from the local health department each school year. *Please provide a written description of how you will ensure that two food safety inspections from the local health department will be obtained each school year.*

---

**General Program Compliance: Reporting and Recordkeeping**

---

- 28 Lunch production records provided do not indicate different portion sizes for different grade groupings K-8 and 9-12. 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 accordion. 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 accordion. *Please provide copies of completed lunch Production Record for Multiple Grade Groupings for 5 consecutive days. Additionally, the certificate of completion of Production Record Overview must be provided.*
- 29 Production record crediting is inaccurate. Specifically, Spanish Rice served at lunch on 9/19/23 credited as 1/2 oz eq grain and 1/2c of vegetable; however, the production record indicated it contained 1/2c vegetable. 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 accordion. *Please provide a production record that reflects the correct crediting information for Spanish Rice. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.*

- |    |   |  |  |
|----|---|--|--|
| 30 | Production record crediting is inaccurate. Specifically, Hamburger Stew served at lunch on 9/20/23 credited as 1oz eq m/ma, 2oz eq grain and 1 1/8c vegetable; however, the production record indicated it contained 6oz eq of grain. | 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning accordion. | <i>Please provide a production record that reflects the correct crediting information for Hamburger Stew. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i> |
| 31 | Production record crediting is inaccurate. Specifically, celery served at lunch on 9/21/23 credited as 3/8c vegetable; however, the production record indicated it contained 1/2c vegetable.  | 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning accordion. | <i>Please provide a production record that reflects the correct crediting information for celery. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i>         |
| 32 | Production record crediting is inaccurate. Specifically, cherry tomato served at lunch on 9/22/23 credited as 1/2c vegetable; however, the production record indicated it contained 1/4c vegetable.                                   | 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning accordion. | <i>Please provide a production record that reflects the correct crediting information for cherry tomato. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i>  |

---

**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 2024 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! St. Peter Indian Mission School has completed the Administrative Review for the 2023-2024 school year. Thank you for your hospitality through the review process. 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 type="checkbox"/> No- SBP	<input checked="" type="checkbox"/> Yes- SBP	\$1,244.88
<input type="checkbox"/> No- NSLP	<input checked="" type="checkbox"/> Yes- NSLP	\$3,227.70

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by February 12, 2024 to Berenice Camacho Castaneda, [Berenice.Camachocastaneda@azed.gov](mailto:Berenice.Camachocastaneda@azed.gov)

---

Reviewer Signature \_\_\_\_\_ Date \_\_\_\_\_

---

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 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](http://www.azed.gov)  
"We are a service organization committed to raising academic outcomes and empowering parents."

This institution is an equal opportunity provider.