



**ARIZONA DEPARTMENT OF  
EDUCATION**

**Health and Nutrition Services Division**

**Administrative Review Summary Report**

School Food Authority Name: Legacy Education Group

CTD: 07-85-07

Site: East Valley High School

Contacts: Kathy Tolman, Director

Review Date: November 16, 2023

Review Period: October 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	The sponsor application in CNPWeb indicated that SFA is using the notification letters provided by ADE when the SFA is using a custom notification letter.	The sponsor application in CNPWeb indicated that SFA is using the notification letter provided by ADE when the SFA is using a custom notification letter.	<i>The sponsor application in CNPWeb indicated that SFA is using the notification letter provided by ADE when the SFA is using a custom notification letter.</i>
---	--	---	--

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

No findings.

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

2	Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast and lunch.	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.	<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>
---	---	--	---

- |   |  |  |   |
|---|--|--|---|
| 3 | On the day of review, it was observed that ten breakfasts counted for reimbursement did not contain all of the required meal components. This 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. 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. The Recognizing a Reimbursable Meal at the Point of Service and/or Recognizing a Reimbursable Breakfast Meal at the Point of Service Recorded Webinar & Webinar Slides 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 Library accordion. | <i>Please provide a written description of the changes that have been made to ensure that all breakfasts counted for reimbursement contain all of the required meal components. Additionally, the certificate of completion of Recognizing a Reimbursable Meal at the Point of Service must be submitted.</i> |
|---|--|--|---|

---

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

---

No findings.

---

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

---

No findings.

---

**Meal Access & Reimbursement: Verification**

---

- |   |  |  |  |
|---|--|--|--|
| 4 | The person designated as the confirming official is the same person who makes eligibility determinations.  | Discussed requirement for having a designated official for conducting confirmation reviews who is not the same person who determined eligibility. The Online Training: Verification Review 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 Library accordion. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals accordion. | <i>Please provide the name and title of the individual designated as the confirming official. Additionally, please provide written assurance that the person designated as the confirming official will not be the same person who determines eligibility.</i> |
| 5 | The most recent Verification Summary Report was not accurate. Specifically, the verification report states that selected applications were verify through direct verification, when the verification search history shows that only one application with one participant was verify. | Discussed that Verification Summary Report must reflect actual verification process and results, discussed specific discrepancies. Discussed attending ADE's Drop-in Workshop: Submitting for Verification. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals accordion.   | <i>Please provide a written description of the changes that have been implemented to ensure that the Verification Summary Report will accurately reflect the verification practices and results that occurred.</i>   |

6	Verification procedures were not followed correctly. Specifically, the SFA did not follow procedures after the result of verification.	Discussed proper verification procedures and referred to Verification Tracking Form and Online Training: Verification Review 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 Library accordion. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals accordion.	<i>Please provide a written description of changes to the system that have been implemented to ensure that verification will be conducted according to the required procedure. Additionally, the certificate of completion of Online Training: Verification Review must be submitted.</i>
7	Households selected for verification were not notified adequately. Specifically, household was not given a notice that documentation of income or receipt of assistance may be provided from any point in time between the month prior to application and the time the household is required to provide income documentation.	Discussed requirements for notifying households selected for verification and potential timelines. Referred to Notification of Verification Letter and Online Training: Verification Review 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 Library accordion. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals accordion.	<i>Please provide a copy of the notification letter. Additionally, provide written assurance that households selected for verification will be notified according to requirements.</i>

---

**Meal Access & Reimbursement: Meal Counting and Claiming**

---

8	Daily edit checks are not being conducted.	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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational accordion. The Step-by-Step Instruction: How to Complete Daily Edit Checks 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 Library accordion.	<i>Daily edit check was completed during on-site review for the month of review. Additionally, please provide written assurance that daily edit checks will be conducted.</i>
---	--	--	---

---

**Meal Pattern & Nutritional Quality: Offer Versus Serve**

---

9	Signage which explains what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable was not displayed to students at [breakfast/lunch].	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.	<i>Please provide the sign that has been displayed explaining what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i>
---	---	--	--

- |  |  |   |
|--|--|---|
| 10 Offer versus Serve (OVS) was not implemented properly at breakfast. Specifically, students were only taking one or two items, and not the minimum of 3 items, with one of the 3 being a ½ cup of fruit/vegetable. | Provided technical assistance on proper implementation of OVS and discussed with kitchen and point of service staff. Reviewed menu and discussed options for a reimbursable meal under OVS. USDA's Offer Versus Serve Manual, Effective beginning School Year 2015-2016 can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals accordion. | <i>Please provide a written description demonstrating how OVS will be implemented properly. Additionally, please provide written assurance that moving forward, OVS will be implemented properly.</i> |
| 11 Offer versus Serve (OVS) was not implemented properly. Specifically, staff has not been trained on how to recognize a reimbursable meals on Offer VS. Serve.  | Provided technical assistance on proper implementation of OVS and discussed with kitchen and point of service staff. Reviewed menu and discussed options for a reimbursable meal under OVS. USDA's Offer Versus Serve Manual, Effective beginning School Year 2015-2016 can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals accordion. | <i>Please provide a written description demonstrating how OVS will be implemented properly. Additionally, please provide written assurance that moving forward, OVS will be implemented properly.</i> |
| 12 Offer versus Serve (OVS) was not implemented properly. Specifically, students were not given the option to decline a component or receive a smaller or larger portion of any component.                           | Provided technical assistance on proper implementation of OVS and discussed with kitchen and point of service staff. Reviewed menu and discussed options for a reimbursable meal under OVS. USDA's Offer Versus Serve Manual, Effective beginning School Year 2015-2016 can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals accordion. | <i>Please provide a written description demonstrating how OVS will be implemented properly. Additionally, please provide written assurance that moving forward, OVS will be implemented properly.</i> |

---

**Meal Pattern & Nutritional Quality: Meal Components and Quantities**

---

No findings.

---

**Resource Management**

---

- |   |  |   |
|---|--|---|
| 13 The Financial Management System utilized was insufficient to accurately identify and track all revenues and expenditures of the nonprofit school food service program. Specifically, documents were not provided for review. | Discussed feasibility for designating a separate financial account for the nonprofit school food service, as well as the requirement to differentiate revenues and expenditures of the nonprofit school food service program if a separate account cannot be designated. Discussed the importance of establishing a financial management system and internal controls needed to accurately track all revenues and expenditures of the nonprofit school food service program. | <i>Please provide a written description of steps that will be taken to ensure all revenues and expenditures of the nonprofit school food service account are easily identifiable as required in 7 CFR 210.14.</i> |
|---|--|---|

**Procurement**

14 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>
15 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>
16 The SFA did not perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold. Specifically, a cost or price analysis was not conducted for the following goods/services: Blue Willo Catering.	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>
17 The Invitation for Bid did not include the required clauses. Specifically, the termination for cause and for convenience clause with the manner by which it will be effected and the basis for settlement was not included in the following contract solicitations in excess of \$10,000: Blue Willo Catering.	Discussed that all contracts in excess of \$10,000 must address termination for cause and for convenience by the non-Federal entity including the manner by which it will be effected and the basis for settlement.	<i>Please provide the clauses that will be included in future solicitations for formal purchases. Additionally, please provide written assurance that the required clauses will be included in all solicitations.</i>
18 The Invitation for Bid did not include the required clauses. Specifically, the Equal Employment Opportunity clause was not included in the following contract solicitations in excess of \$10,000: Blue Willo Catering.	Discussed that, except as otherwise provided under 41 CFR Part 60, all contracts that meet the definition of "federally assisted construction contract" in 41 CFR Part 60-1.3 must include the equal opportunity clause provided under 41 CFR 60-1.4(b), in accordance with Executive Order 11246, "Equal Employment Opportunity" (30 FR 12319, 12935, 3 CFR Part, 1964-1965 Comp., p. 339), as amended by Executive Order 11375, "Amending Executive Order 11246 Relating to Equal Employment Opportunity," and implementing regulations at 41 CFR part 60, "Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor."	<i>Please provide the clauses that will be included in future solicitations for formal purchases. Additionally, please provide written assurance that the Equal Employment Opportunity clause will be included in all solicitations in excess of \$10,000.</i>

- |  |   |   |
|--|---|---|
| <p>19 The Invitation for Bid did not include the required clauses. Specifically, the Debarment and Suspension clause was not included in the following solicitations: Blue Willo Catering.</p>   | <p>Discussed that a contract award must not be made to parties listed on the governmentwide exclusions in the System for Award Management (SAM), in accordance with the OMB guidelines. SAM Exclusions contains the names of parties debarred, suspended, or otherwise excluded by agencies, as well as parties declared ineligible under statutory or regulatory authority other than Executive Order 12549.</p> | <p><i>Please provide the clauses that will be included in future solicitations for formal purchases. Additionally, please provide written assurance that the Debarment and Suspension clause will be included in all solicitations.</i></p>   |
| <p>20 The SFA did not maintain records sufficient to detail the significant history of the procurement for formal purchases. Specifically, the request for proposals with required clauses, Buy American requirements, and written method for conducting evaluations of proposals was not provided for the following formal purchases: Blue Willo Catering.</p>            | <p>Discussed that non-Federal entities must maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to, the following: Rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.</p>  | <p><i>Please provide a written description of procurement procedures that will be implemented to ensure that sufficient records for the request for proposals with required clauses, Buy American requirements, and written method for conducting evaluations of proposals will be maintained for all formal purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.</i></p> |
| <p>21 The SFA did not have procedures for providing sufficient oversight of the procurement to ensure contractors performed in accordance with the terms, conditions, and specifications of their contracts. Specifically, procedures for providing sufficient oversight of the procurement were not provided for the following formal purchases: Blue Willo Catering.</p> | <p>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.</p>   | <p><i>Please provide a written description of procurement procedures that will be implemented to provide sufficient oversight of the terms, conditions, and specifications of awarded contracts. Additionally, please provide written assurance that all records will be maintained for 5 years.</i></p>  |

---

### General Program Compliance: Civil Rights

---

22 Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, the SFA procedures indicate that they attempt to resolve the complaint themselves.	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 <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> . The Step-by-Step Instruction: How to File a Civil Rights Complaint 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 Library accordion.	<i>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.</i>
23 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational accordion. Additionally, referred to Accommodating Children with Disabilities in the School Meal Program found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals accordion. Step-by-Step Instruction: How to Complete the Medical Statement for Students with Special Dietary Accommodations can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion.	<i>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.</i>

24 The "And Justice for All" poster was not displayed in a prominent location and was not visible to all program participants.	Discussed requirements of where poster must be placed and where to find a printable "And Justice For All" poster on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> . Referred to HNS 08-2019 USDA Nondiscrimination And Justice for All Poster Clarification.	<i>Please provide pictures to demonstrate the posters are now displayed in a prominent location and visible to all program participants. Additionally, 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**

---

25 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. [Note any methods the school may have decided to employ]. The Local Wellness Policy Final Rule: Guidance and Tools From ADE 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 description of how the public will be notified of the existence and contents of the LWP.</i>
26 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 <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 description of how the LWP will be reviewed and updated as well as how reviews and updates will be documented.</i>
27 A recent assessment of the implementation of the Local Wellness Policy (LWP) has not been conducted nor have plans been developed to complete the assessment.	Discussed requirement to complete an assessment once every three years, at a minimum. The assessment must measure how the LEA is complying with their 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>



28 A plan is not in place to notify the public of the results of the most recent assessment of the implementation of the Local Wellness Policy (LWP), when assessment is conducted.	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 <a href="https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit/">https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit/</a> .	<i>Please provide a written plan for how the public will be notified of the results of the most recent assessment of the implementation of the LWP.</i>
---	---	---

---

**General Program Compliance: Competitive Food Services**

---

No findings.		
29 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 <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 description of how the LWP will be reviewed and updated as well as how reviews and updates will be documented.</i>

---

**General Program Compliance: Professional Standards**

---

30 Professional Standards training hours are not being tracked on an annual basis. Specifically, professional standards training are not being tracked for manager, full-time, part-time and for employees that work outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program.	Referred to USDA's Professional Standards Training Tracker Tool and discussed requirements for tracking. - OR- Referred to ADE's Training Tracking forms 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 Professional Standards accordion -OR- Discussed creating their own training tracker with all required information. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors 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 Library accordion.	<i>Please provide the tracker that will be used to track Professional Standards training hours on an annual basis for all School Nutrition Program staff. Additionally, please provide written assurance that Professional Standards training hours will be tracked for all School Nutrition Program staff on an annual basis. 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**

---

31 A written food safety plan has not been developed.	Discussed required components of a food safety plan and resources available on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Food/Health Safety accordion.	<i>Please provide a copy of a written food safety plan.</i>
---	---	---

32 Storage violations were observed. Specifically, refrigerator holding milk does not have a thermometer inside to take internal temperature.	Discussed specific violations and feasible solutions. Referred to Arizona's School Food Safety Guidance 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 Food/Health Safety accordion. Additionally, discussed Food Safety Online Training Library can be found on ICN's website at <a href="https://theicn.org/icn-resources-a-z/food-safety/">https://theicn.org/icn-resources-a-z/food-safety/</a> .	<i>Please provide a written description of the changes that have been made to correct the storage violations found.</i>
33 Temperature logs for food storage areas are not being maintained.	Discussed requirements for maintaining food storage area temperature logs, sample templates, and who would be responsible. Temperature logs for food storage areas must be maintained for 6 months. Monitoring forms 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 Food/Health Safety accordion. Additionally, discussed Food Safety Online Training Library can be found on ICN's website at <a href="https://theicn.org/icn-resources-a-z/food-safety/">https://theicn.org/icn-resources-a-z/food-safety/</a> .	<i>Please provide a copy of the temperature log that will be used for food storage areas as well as written assurance that logs will be kept daily and maintained on-file for 6 months.</i>

---

**General Program Compliance: Reporting and Recordkeeping**

---

34 The Year-end statement of Revenue and Expenses for the Nonprofit School Food Service Account was not submitted to ADE on time.	Discussed reporting requirements for Year-end statement of Revenue and Expenses for the Nonprofit School Food Service Account and who would be responsible for submitting.	<i>Please provide written assurance that the Year-end statement of Revenue and Expenses for the Nonprofit School Food Service Account will be submitted on time to ADE as is required by October 15, each year, as well as the steps that will be taken to ensure this requirement is adhered to.</i>
35 <i>Production records for breakfast and lunch provided did not contain all required sections: Specifically, production records used/left over section is not completed adequately.</i>	Discussed required sections of production records. Production Record Templates 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. The Production Record Overview Recorded Webinar & Webinar Slides 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 Library accordion.	<i>Please provide copies of completed breakfast and lunch production records for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years. Additionally, the certificate of completion of Production Record Overview must be provided.</i>
36 <i>Production record crediting is inaccurate. Specifically, Caesar salad with chicken served at lunch on October 2nd 3rd 4th and 5th, 2023 credited as 2-7/8 cup dark green vegetable based on recipe analysis; however, the production record indicated it contained 1 cup dark green vegetable.</i>	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 cesar salad with chicken. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i>

37 <i>Temperature logs for food storage areas are not being maintained.</i>	Discussed requirements for maintaining food storage area temperature logs, sample templates, and who would be responsible. Temperature logs for food storage areas must be maintained for 6 months. Monitoring forms 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 Food/Health Safety accordion. Additionally, discussed Food Safety Online Training Library can be found on ICN's website at <a href="https://theicn.org/icn-resources-a-z/food-safety/">https://theicn.org/icn-resources-a-z/food-safety/</a> .	<i>Please provide a copy of the temperature log that will be used for food storage areas as well as written assurance that logs will be kept daily and maintained on-file for 6 months.</i>
38 <i>Published menu does not accurately reflect what is being served. Specifically, Lunch menu has juice and a side salad listed; however, these items were not provided.</i>	Discussed that although menus are subject to change, the menu should not list options that the SFA knows will not be offered.	<i>Please provide a lunch menu and 5 days of lunch production records to support the lunch menu.</i>

---

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

---

39 <i>Menus are not posted on district website and copies are available on-site; however, sufficient outreach to families regarding the availability of the School Breakfast Program (SBP) was not conducted at the beginning of or during the school year. Specifically, the serving times, locations where breakfast is available, and SBP costs is not communicated to families.</i>	Discussed methods of notifying families of the availability of the SBP at the start of and throughout the school year and determined. 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>
40 <i>Households were not notified of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year.</i>	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 and summer feeding locations can be found at <a href="https://www.azhealthzone.org/">https://www.azhealthzone.org/</a> .	<i>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.</i>
41 <i>Records documenting breakfast menu for the review period was not kept on file for the minimum required 5 years.</i>	Discussed record keeping requirements and timeframe of 5 years.	<i>Please provide written assurance that all documents pertaining to the school meal programs will be retained on file for at least 5 years, as is required by Arizona law, as well as a written plan for ensuring that this requirement is met.</i>

---

**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, Legacy Education Group has successfully completed the Administrative Review for the 23-24 school year. Thank you for your cooperation during the review process. Please remember that we have a variety of trainings online to assist you and your staff in operating a successful National School Lunch Program.

**To stay on track with NSLP requirements, check out the NSLP at a Glance Calendar & Monthly Checklist on our website at <https://www.azed.gov/hns/nslp/forms> under the Calendars and Checklists tab.**

**Training: In-person classes, web-based training, and how-to guides can be found on ADE's website at <https://www.azed.gov/hns/nslp/training>.**

Fiscal Action Assessed?

<input checked="" type="checkbox"/> No- SBP	<input type="checkbox"/> Yes- SBP	\$15.20
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$0

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **January 16, 2024** to Amy Dixon Banire at [Amy.DixonBanire@azed.gov](mailto:Amy.DixonBanire@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.

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.