



**ARIZONA DEPARTMENT OF  
EDUCATION**

**Health and Nutrition Services Division**

**Administrative Review Summary Report**

School Food Authority Name: Morristown Elementary District  
 CTD: 07-03-75  
 Site: Morristown Elementary School

Contacts: Dr. Jennifer Pretty, Superintendent/ Principal and Patricia Simpson

Review Date: April 15, 2024

Review Period: March 2024

Programs Reviewed:

- National School Lunch     
  School Breakfast     
  Afterschool Snack  
 Fresh Fruit & Vegetable     
  Special Milk     
  At-Risk Afterschool Meals

No.	Review Observations & Findings	Technical Assistance Provided	Required Corrective Action
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**Performance Standard 1: Certification and Benefit Issuance – Critical Area**

1	<p>Multiple applications were certified incorrectly or utilized incomplete information. This contributed toward fiscal action calculations.</p>	<p>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 <a href="https://www.azed.gov/hns/nsip">https://www.azed.gov/hns/nsip</a> 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 <a href="https://www.azed.gov/hns/nsip/training">https://www.azed.gov/hns/nsip/training</a> under the Online Training Library accordion.</p>	<p><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></p>
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**Performance Standard 1: Meal Counting and Claiming – Critical Area**

2	No finding.
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**Performance Standard 2: Meal Components & Quantities – Critical Area**

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3 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the weekly minimum meat/meat alternate requirement was not met at 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 <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. 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 weekly meat/meat alternate quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu</i>
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**Performance Standard 2: Dietary Specifications and Nutrient Analysis – Critical Area**

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No finding.

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

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No finding.

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**Meal Access & Reimbursement: Verification**

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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>
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<p>5 Documentation to support that a confirmation review took place was not maintained. Specifically, a conformation review was not conducted for selected applicant.</p>	<p>Discussed requirement for having a designated official confirm the eligibility of an application selected for verification. Referred to The Online Training: Verification Review found on ADE's website at <a href="https://www.azed.gov/hns/nsfp/training">https://www.azed.gov/hns/nsfp/training</a> under the Online Training Library accordion. Referred to Verification Tracking Form found on ADE's website at <a href="http://www.azed.gov/hns/nsfp/forms">http://www.azed.gov/hns/nsfp/forms</a> under the Eligibility Documents for School Meal Benefits 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/nsfp">https://www.azed.gov/hns/nsfp</a> under the Guidance Manuals accordion.</p>	<p><i>Please provide written procedures for how the confirmation review will be conducted and written a ssurance that all applications selected for verification will undergo a confirmation review by a separate designated official and that this confirmation review will be documented.</i></p>
<p>6 Households that failed to respond to verification were not given adequate follow-up. Specifically, the households who failed to respond to verification were not provided 10 calendar days before terminating benefits.</p>	<p>Discussed requirements for notifying households of adverse action, including timelines and dates to be included on the notice. Referred to Online Training: Verification Review found at <a href="https://www.azed.gov/hns/nsfp/training">https://www.azed.gov/hns/nsfp/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/nsfp">https://www.azed.gov/hns/nsfp</a> under the Guidance Manuals accordion.</p>	<p><i>Please provide written procedures for notifying households of a decrease in benefit status and written a ssurance that an adequate notice of adverse action will be provided to households that will have a decrease in benefits.</i></p>
<p>7 Verification procedures were not followed correctly. Specifically, households for whom benefits were to be reduced or terminated were not given 10 calendar days written advance notice of the change.</p>	<p>Discussed proper verification procedures and referred to ADE's Verification Tracking Form and Online Training: Verification Review on ADE's website at <a href="https://www.azed.gov/hns/nsfp/training">https://www.azed.gov/hns/nsfp/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/nsfp">https://www.azed.gov/hns/nsfp</a> under the Guidance Manuals accordion.</p>	<p><i>Please provide the written procedures for ensuring that households for whom benefits were to be reduced or terminated will be given 10 calendar days written advance notice of the change.</i></p>

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

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No finding.

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

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No finding.

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

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No finding.

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**Resource Management**

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| 8  | All revenue from nonprogram foods did not accrue to the nonprofit school foodservice account. Specifically, document was not provided to show that the seven-meal served to adults at the price of 3.75 per meal were transfer to the non-profit school foodservice account.   | Discussed requirement that all revenue from the sale of nonprogram foods must return to the non-profit school foodservice account if nonprogram foods were purchased through the non-profit school foodservice account as specified in 7 CFR 210.14(f). Reviewed current procedures for depositing revenue from the sale of nonprogram foods to the nonprofit school foodservice account and suggested changes. Explained that the revenue from the sale of the nonprogram foods must be returned to the non-profit school foodservice account for fiscal year 2024. | <i>Please provide a written description of the procedures that will be implemented to ensure that all revenue from the sale of nonprogram foods will accrue to the nonprofit school food service account. Additionally, please provide documentation which reflects that any revenue that did not previously accrue to the nonprofit school food service account for nonprogram foods [include dollar amount] has been reimbursed to this account.</i> |
| 9  | Compliance with the revenue from nonprogram food requirements via either the Nonprogram Food Revenue Tool or 5-Day Reference Period as described in FNS Policy Memo SP 20-2016 was not assessed.   | Discussed revenue from nonprogram food requirements and provided with Nonprogram Food Revenue Tool. Referred to FNS Instruction 782-5 REV. 1 for more information about pricing for nonprogram adult meals.  | <i>Please complete and submit either the USDA Nonprogram Food Revenue Tool or 5-Day Reference Period as evidence of compliance with revenue from nonprogram food requirements.</i>   |
| 10 | Meals served to teachers, administrators, custodians, and other adults were not priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or payroll funds, or funding from voluntary | Discussed ways to determine adult meal prices which included a per meal cost analysis and pricing utilizing the Adult Meal Pricing Tool. Non-Pricing Sites: pricing adult meals to reflect the amount of reimbursement received for a free meal plus the per meal value of   | <i>Please provide a written description of the steps which have been taken to increase adult meal prices and resolve the discrepancy, including the exact formula used to price adult meals. Additionally, please submit supporting documentation which reflects that prices have been increased to</i>  |

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**Procurement**

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| 11 | 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>Correction has been made, no further action needed..</i> |
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12 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>
13 Small purchase procedures were not in compliance with procurement requirements. Specifically, no solicitation, evaluation, or award documentation was provided for the following small purchases: (Aspin/Mohave) Shamrock Foods/Shamrock.	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, evaluation, and award 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>
14 The SFA did not maintain records sufficient to detail the significant history of the procurement for small purchases. Specifically, insufficient evaluation and award documentation was maintained for the following small purchases: (Aspin/Mohave) Shamrock Foods/Shamrock.	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.	<i>Please provide a written description of procurement procedures that will be implemented to ensure that sufficient records of the evaluation and award will be maintained for all small purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.</i>

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**General Program Compliance: Civil Rights**

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No finding.

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**General Program Compliance: SFA On-Site Monitoring**

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Not applicable.

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**General Program Compliance: Local Wellness Policy**

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| 15 | The Local Wellness Policy (LWP) did not contain all required elements. Specifically, the LWP did not contain policies for food and beverage marketing.                 | Discussed updating the LWP to include policies that allow marketing and advertising of only those foods and beverages that meet Smart Snacks Standards during the school day. Explained that this requirement applies to exterior vending machines, posters, menu boards, coolers, trash cans and cups used for beverage dispensing. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at <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 how n policies for food and beverage marketing will be added to the LWP. The plan should include draft language of the element to be added, who will be involved in updating the LWP and the date the update is expected to be completed. Additionally, provide written assurance that the LWP will be specific to your institution.</i> |
| 16 | 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>  |
| 17 | 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>  |

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**General Program Compliance: Competitive Food Services**

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No finding.

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**General Program Compliance: Professional Standards**

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| 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. | 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> 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 <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 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> |
| 19 | More than two hours per year from recorded webinars are being counted towards annual Professional Standard trainings.   | Discussed that only two hours per year from recorded webinars that do not include a self-administered quiz can be counted towards the annual Professional Standards 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> 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 <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 it will be ensured that appropriate trainings will be counted towards annual training requirements. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i>   |

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**General Program Compliance: Water**

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No finding.

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

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20	The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site Morristown Elementary School during the review period fore for Banana and mandarin Orange (Product of Mexico). Additionally, documentation justifying a Buy American exception was not maintained/on file.	Discussed the Buy American provision requirements and procedures to ensure compliance. Referred to SP38-2017, Buy American Webinar and FAQ. Funds used from the non-profit food service account must be used to procure food products that comply with the Buy American Provision. Additional information on the requirements of this provision, including ADE's prototype Buy American exception document, can be found on ADE's website at <a href="https://www.azed.gov/hns/nsfp/forms">https://www.azed.gov/hns/nsfp/forms</a> under the Operational accordion. Buy American Recorded Webinar and FAQ can be found on ADE's website at <a href="https://www.azed.gov/hns/nsfp/training">https://www.azed.gov/hns/nsfp/training</a> under the Online Training Library accordion.	<i>Please provide a written description of the changes that have been made to procurement recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i>
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**General Program Compliance: Reporting and Recordkeeping**

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No finding.

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

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No finding.

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**Other Federal Program Reviews: Afterschool Snack Program**

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Not applicable.

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**Other Federal Program Reviews: Seamless Summer Option**

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Will be reviewed in Summer 2024 if applicable.

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**Other Federal Program Reviews: Fresh Fruit and Vegetable Program**

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Not applicable.

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**Other Federal Program Reviews: Special Milk Program**

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Not applicable.

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**Other Federal Program Reviews: At-Risk Afterschool Meals**

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Not applicable.

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Comments/Recommendations:



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Congratulations on completing the Administrative Review! Thank you for your hard work and cooperation during this process. It was a pleasure visiting your school and seeing what a great job all of your staff are doing and the amount of delicious meals being served. You are all doing a wonderful job implementing the School Nutrition Programs and successfully navigating all of the current challenges. Please keep up the great work!

**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	\$376.00
<input type="checkbox"/> No- NSLP	<input checked="" type="checkbox"/> Yes- NSLP	\$1,583.95

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **June 10, 2024** to Amy Dixon Banire at [Amy.DixonBanire@azed.gov](mailto:Amy.DixonBanire@azed.gov).

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

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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.