



**ARIZONA DEPARTMENT OF  
EDUCATION**

**Health and Nutrition Services Division**

**Administrative Review Summary Report**

School Food Authority Name: Desert Sky Community School, Inc.

CTD: 10-87-32

Site: Desert Sky Community School

Contacts: Zoraida Gonzalez, Administrator; Cathy Rex, Board President

Review Date: October 22, 2024

Exit Conference Date: November 1, 2024

Review Period: September 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**

*No findings.*

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

1	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">ADE's website at 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">ADE's website at https://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion.	<i>Please provide a completed daily edit check worksheet for the most recently submitted claim month. Additionally, please provide written assurance that daily edit checks will be conducted. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete Daily Edit Checks must be submitted.</i>
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**Performance Standard 2: Meal Components & Quantities – Critical Area**

2	Fluid milk was not available prior to meal service in at least two varieties at breakfast on the day of review. Additionally, fluid milk was not available through the meal service in at least two varieties at lunch on the day of review. This was not a repeat finding from the previous cycle and therefore did not contribute toward fiscal action calculations.	Discussed variety requirement and feasible options for compliance. Allowable milk varieties are fat-free, unflavored; fat-free, flavored; low-fat (1%), unflavored; and low-fat (1%) flavored. Please note that repeated violations involving milk requirements may result in fiscal action.	<i>Please provide one week of breakfast and lunch production records that demonstrate that fluid milk was available in at least two varieties. Additionally, please provide written assurance that fluid milk will always be available in at least two varieties at breakfast and lunch.</i>
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| <p>3 Food quantities served at breakfast during the review period did not meet minimum amounts required by the meal pattern. Specifically, 6 oz eq of grain was served during the week of review when 7 oz eq of grain is required weekly at breakfast for grades K-5. This was not a repeat finding from the previous cycle and therefore did not contribute toward fiscal action calculations.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). 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.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that grain quantities at breakfast 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> |
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**Performance Standard 2: Dietary Specifications and Nutrient Analysis – Critical Area**

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*No findings.*

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

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No findings.

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**Meal Access & Reimbursement: Verification**

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*No findings.*

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

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No findings.

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

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| <p>4 Cafeteria staff have not been properly trained on Offer versus Serve (OVS) meal service for breakfast and lunch.</p> | <p>Discussed that schools are expected to conduct training for point of service and serving line staff so they can help students select the required food components/food items in the quantities needed for reimbursable lunches and breakfasts. Additionally discussed that this could be included in the annual training requirements for program staff. Referred to USDA's Offer Versus Serve Manual located 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.</p> | <p><i>Please provide a written description of how cafeteria staff will be trained on OVS. Additionally, the certificate of completion of Meal or No Meal and Meal or No Meal - Breakfast Edition must be submitted.</i></p> |
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**Meal Pattern & Nutritional Quality: Meal Components and Quantities**

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No findings.

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**Resource Management**

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<p>5 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 agencies) was sufficient to cover the overall cost of the meal. Specifically, adult meal prices are \$4.75 when the adult meal price tool for high rate reimbursement is \$4.85 at minimum .</p>	<p>Discussed ways to determine adult meal prices which included a per meal cost analysis and pricing utilizing the Adult Meal Pricing Tool. For Non-Pricing Sites: pricing adult meals to reflect the amount of reimbursement received for a free meal plus the per meal value of entitlement and bonus commodities for non-pricing programs. Referred to Adult Meal Pricing Tool located on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms/">https://www.azed.gov/hns/nslp/forms/</a> under the Financial accordion.</p>	<p><i>Please provide a written description of the steps which have been taken to increase adult meal prices, including the exact formula used to price adult meals. Additionally, please provide documentation demonstrating the prices have been increased to the appropriate level.</i></p>
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**General Program Compliance: Civil Rights**

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<p>6 The USDA nondiscrimination statement used on program materials is not the most current USDA statement. Specifically, the Notification of Benefits did not contain the most current USDA nondiscrimination statement.</p>	<p>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.</p>	<p><i>Please provide an updated Notification of Benefits with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i></p>
<p>7 The Civil Rights Compliance Form did not use school data for completion. Specifically, zip code census data was used instead of school specific data to complete the form.</p>	<p>Discussed requirement for completing form and how to collect racial/ethnic data from program participants. The form can be found on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a>. The Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form 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.</p>	<p><i>Please provide a written description of how the Civil Rights Compliance form will be completed by December 15 each year and maintained, including the individual who will be responsible for completing the form. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form must be submitted.</i></p>

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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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<p>8 Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the Local Wellness Policy. Specifically, students and the general public were not made aware of their ability to participate in the development, review, and update of the Local Wellness Policy.</p>	<p>Discussed feasible means of notifying potential stakeholders of their ability to participate. Plan for announcing participation at school assemblies and posting around school neighborhood. 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.</p>	<p><i>Please provide a written description of how all potential stakeholders, including students and the general public, will be made aware of their ability to participate in the development, review, update, and implementation of the Local Wellness Policy.</i></p>
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| 9  | The recent assessment of the implementation of the Local Wellness Policy did not meet the Final Rule requirements. Specifically, the assessment did not determine how the wellness policy compares to model wellness policies and progress made in attaining the goals of the wellness policy. | Discussed requirement to complete an assessment once every three years, at a minimum. The assessment must determine compliance with the wellness policy, how the wellness policy compares to model wellness policies, and progress made in attaining the goals of the wellness policy. Plan to use Rudd Center and ADE assessment resources. 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 Local Wellness Policy, including determining how the wellness policy compares to model wellness policies and progress made in attaining the goals of the wellness policy. 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> |
| 10 | The public was not notified of the results of the most recent assessment of the implementation of the Local Wellness Policy.   | 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 Local Wellness Policy. Plan to post on school website after completion to meet final rule. 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 the notification provided to the public of the results of the most recent assessment of the implementation of the Local Wellness Policy. Additionally, please provide written assurance that the public will be notified of results each time the Local Wellness Policy is assessed.</i>  |

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**General Program Compliance: Competitive Food Services**

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*No findings.*

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**General Program Compliance: Professional Standards**

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| 11 | 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 <a href="https://theicn.org/icn-resources-a-z/food-safety/">https://theicn.org/icn-resources-a-z/food-safety/</a> . | <i>Please provide the expected date that food safety certification training will be completed by the School Nutrition Program Director.</i> |
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| <p>12 School Nutrition Programs director has not completed annual training on Federal procurement standards.</p>  | <p>Discussed that school nutrition program directors, management, and staff tasked with National School Lunch Program procurement responsibilities must complete annual training on Federal procurement standards annually. Additionally discussed that procurement training may count towards the professional standards training standards. 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. Procurement Basics training 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.</p> | <p><i>Please provide the certificate of completion of Procurement Basics (or an equivalent training on Federal procurement standards) for School Nutrition Programs director. Additionally, please provide written assurance that annual training on Federal procurement standards will be completed annually.</i></p>   |
| <p>13 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.</p>   | <p>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.</p>   | <p><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></p> |
| <p>14 Part-time School Nutrition Program staff have not met the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed to complete the annual training requirements.</p> | <p>Discussed 4 hour training 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.</p>   | <p><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 part-time School Nutrition Program staff are registered for.</i></p>  |



<p>15 Professional Standards training hours are not being adequately tracked. Specifically, there is no comprehensive tracking system in place. Employees do not have a current plan of tracking their current and future training hours to combine trainings and ensure that hours are met per employee annually.</p>	<p>Discussed feasibility of different tracking methods for the school year. Suggested utilizing ADE training tracker forms or 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.</p>	<p><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 a written description of how Professional Standards training hours will be tracked and utilized to ensure that all School Nutrition Program staff meet their training requirements.</i></p>
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**General Program Compliance: Water**

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*No findings.*

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

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*No findings.*

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**General Program Compliance: Reporting and Recordkeeping**

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<p>16 Reports are not submitted to the State agency as required. Specifically, the submitted site application in CNPWeb during the week of review indicated that Desert Sky Community School is not operating offer versus serve when the site is operating offer versus serve.</p>	<p>Discussed steps required to update the site application in CNPWeb to reflect current practice of offer versus serve, including notifying the assigned specialist approving applications of the update.</p>	<p><i>Updated application is submitted and approved. Please provide written assurance that the site application in CNPWeb will be updated to accurately reflect current practices whenever site operations change.</i></p>
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<p>17 The caterer is completing production records for breakfast and lunch when the caterer does not serve breakfast and lunch and is not present at breakfast and lunch meal service to count the actual amount of items served and the actual amount of items left over.</p>	<p>Discussed importance of the server (whether SFA or caterer depending on meal service) completing production records before meal service to document the actual amount of items served and after meal service to record the actual amount of items left over.</p>	<p><i>Please provide a written description of the changes that have been made to procedures for completing production records to ensure items served and items left over are accurately recorded. Additionally, the certificate of completion of Production Record Overview must be provided.</i></p>
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<p>18 Production records did not reflect actual items served on the day of review. Specifically, the production record indicated that chocolate milk was available at breakfast when only low-fat, unflavored milk was provided at breakfast on October 22, 2024.</p>	<p>Discussed requirement for production records to accurately reflect actual items served. 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 &amp; 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.</p>	<p><i>Please provide a written description of the changes that have been made to procedures for completing production records to ensure actual items served are accurately recorded.</i></p>
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**General Program Compliance: School Breakfast Program and Summer Food Service Program Outreach**

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*No findings.*

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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 2025 if applicable.

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

*Not applicable.*

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

*Not applicable.*

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

*Not applicable.*

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Comments/Recommendations:

Congratulations! Desert Sky Community School has completed the Administrative Review for the 2025 program year. Thank you for your hospitality throughout the review process. It is recommended that the meal pattern and professional standards areas of the program are monitored internally to ensure ongoing compliance.

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

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

Fiscal Action Assessed?

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| <input checked="" type="checkbox"/> No- SBP  | <input type="checkbox"/> Yes- SBP  | \$0 |
| <input 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 6, 2025 to Destinee Williams at [Destinee.Williams@azed.gov](mailto:Destinee.Williams@azed.gov). The response must be on organizational letterhead and signed by an authorized representative and must indicate that corrective actions will be implemented SFA-wide.

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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)

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