



# ARIZONA DEPARTMENT OF EDUCATION

## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Williams Unified District

CTD: 03-02-02

Site: Williams High School

Contacts: Eric Evans, Superintendent and Sandra Angat, Food Service Director

Review Date: March 24, 2025

Exit Conference Date: March 24, 2025

Review Period: February 2025

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	Meal count totals were not correctly combined and recorded at breakfast and lunch during the review period. This was deemed a non-systemic error 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 such as having multiple individuals responsible for consolidating meal counts and/or switching to a system that does not require transferring counts from one format to another.	<i>Please provide a written description of changes to the system that have been implemented to ensure that meal count totals are correctly combined and recorded, including the date of implementation.</i>
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#### Performance Standard 2: Meal Components & Quantities – Critical Area

2	On the day of review, it was observed that 19 breakfasts counted for reimbursement did not contain all of the required meal components. Specifically, breakfasts were observed without a 1/2 cup fruit or vegetable and with only 2 items (e.g., 1-ounce grain item and fruit, milk and fruit, etc.). Additionally, cranberry juice cocktail (15% juice), which is not creditable toward meal pattern requirements, was used as the fruit component for multiple breakfasts counted for reimbursement. 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 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/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 ensure that all breakfasts counted for reimbursement contain all of the required meal components, including written assurance that cranberry juice cocktail will not be used to meet the fruit component at any meal service. Additionally, the certificate of completion of Recognizing a Reimbursable Breakfast Meal at the Point of Service must be submitted.</i>
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3	Fluid milk was not available in at least two varieties at breakfast or 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>
4	The following vegetable subgroup was not offered during the review period: Starchy. This was not a repeat finding from the previous cycle and therefore did not contribute toward fiscal action calculations.	Discussed vegetable subgroup requirements for the age/grade groups served. vegetable Subgroup Quick Guide 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 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 vegetable subgroups may result in fiscal action.	<i>Please provide one week of lunch production records which demonstrate compliance with the vegetable subgroups. Additionally, please provide written assurance that moving forward, all menus will be planned to meet the vegetable subgroup requirements. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.</i>
5	During the week of review, at least 80% of grains served at lunch were not whole grain-rich. Specifically, only 71.43% of grains served at lunch during February 3-6, 2025 were whole grain-rich.	Discussed requirement for at least 80% of grains served to be whole grain-rich, how to identify whole grain-rich items, and potential changes to the menu to increase whole grain-rich percentage. 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 lunch production records and supporting documentation (e.g., Child Nutrition label, Product Formulation Statement, ingredient lists, Nutrition Facts labels, etc.) that demonstrate at least 80% of grains served at lunch were whole grain-rich.</i>

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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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6	Offer versus Serve (OVS) was not implemented properly at breakfast. Specifically, meals were counted as reimbursable that were missing the required components for Offer versus 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 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>
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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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7	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, adults were charged \$2.50 for breakfast when the minimal required price is \$2.84 and adults were charged \$4.00 for lunch when the required price is \$4.84.	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.	<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 and documentation supporting that the difference between adult meal price charged and the required adult meal prices throughout the month of February 2025 has been restored to nonprofit school food service account using non-Federal funds.</i>
8	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 that assessing compliance with revenue from nonprogram foods requirements ensures that revenues from the sales of nonprogram foods generate at least the same proportion of SFA revenues as they contribute to SFA food costs. Referred to Nonprogram Food Revenue Tool & Calculator 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.	<i>Please complete and submit either the USDA Nonprogram Food Revenue Tool or 5-Day Reference Period to support compliance with revenue from nonprogram food requirements.</i>

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#### General Program Compliance: Civil Rights

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9	The USDA nondiscrimination statement not printed on appropriate program materials. Specifically, the public release did not include the USDA nondiscrimination statement.	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 public release (template) with the nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated to include the appropriate nondiscrimination statement.</i>
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#### General Program Compliance: SFA On-Site Monitoring

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*No findings.*

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#### General Program Compliance: Local Wellness Policy

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*No findings.*

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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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*No findings.*

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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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| 10 | The most recent food safety inspection report was not posted in a prominent location visible to all program participants.   | Discussed making copies of most recent report and feasible places for posting, such as the main dining area, meal service line, school bulletin board, or front office.   | <i>The most recent food safety inspection was posted in the school entrance hallway on the day of review. No further action is required.</i>   |
| 11 | The following products observed at Williams High School were in violation of the Buy American Provision (i.e., were non-domestic) and documentation justifying a Buy American exception were not maintained on file: 100% Pineapple Orange Juice (concentrates from USA, Brazil, Costa Rica, Mexico, Indonesia, Philippines, and/or Thailand), 100% Grape Juice (concentrate from USA, Spain, Argentina, Mexico and/or Chile), 15% Cranberry Cocktail (concentrate from USA, Child, and/or France), 100% Orange Juice (concentrate from USA, Brazil, Costa Rica, and/or Mexico), and Fajita Vegetable Blend (product of China). | Discussed that funds used from the nonprofit school food service account must be used to procure food products that comply with the Buy American Provision. Additionally discussed procedures for documenting a Buy American exception. Referred to SP38-2017, Buy American Webinar and FAQ. 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/nslp/forms">https://www.azed.gov/hns/nslp/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/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 procurement and/or 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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| 12 | Portion sizes recorded on the production record are inaccurate. Specifically, the following items did not reflect correct portion sizes: Beef Stroganoff, yogurt, and juice.   | Discussed ensuring consistency with recipes, labels, and production records to reflect what was actually served.   | <i>Please provide a written description of changes made to ensure portion sizes are correctly reflected on production records.</i>  |
| 13 | Production record crediting is inaccurate. Specifically, the following items did not reflect correct crediting information: Nutrigrain Bars, Rice Krispies, Pop-Tarts, Yogurt Chex, Craisins, French Toast Sticks, Craisins, Tomato Soup, Hard Boiled Egg, Tortilla Strips, and Lettuce. | Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Additionally discussed that crediting information is not a required element of a production record and therefore is not required to be included on the production record. 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 written description of changes made to ensure crediting is correctly reflected on production records. If the operation chooses not to include the optional crediting information on the production record moving forward, please provide production records for 5 consecutive days demonstrating that it is no longer included.</i> |

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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**

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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, Williams Unified District has successfully completed the administrative review for the 2024-2025 school year. It is recommended that trainings in meal counting, reimbursable meals, and meal pattern are completed throughout the year. It is also recommended that internal compliance checks are conducted periodically in these critical areas to maintain program integrity. Additionally, it is recommended that a system that allows for tracking of a la carte purchases and meals served at the point of service is implemented. Thank you for your cooperation during the review process

**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	\$8.52
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$1.06

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by May 14, 2025 to Kariann Sadlon at [Kariann.Sadlon@azed.gov](mailto:Kariann.Sadlon@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
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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.