



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Cottonwood Day School

CTD: 01-43-05

Site: Cottonwood Day School

Contacts: David Propst, School Principal and Selina Yazzie, Lead Cook

Review Date: March 26, 2025

Exit Conference Date: March 26, 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
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.	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.
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Performance Standard 2: Meal Components & Quantities – Critical Area

2	During the week of review, at least 80% of grains served at lunch were not whole grain-rich. Specifically, only 77% of grains served at lunch during February 3-7, 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 https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion.	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.
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| <p>3 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 1/4 cup Red/Orange vegetables was served on February 3-7, 2025 when 3/4 cup is required weekly at lunch for grades K-8. This was a repeat finding from the previous cycle and therefore did 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 Lunch Program can be found on ADE's website at http://www.azed.gov/hns/nslp under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that weekly Red/Orange vegetable quantities at lunch meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.</i></p> |
| <p>4 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 1/2 cup of vegetables was served on February 6, 2025 and 3/8 cup of vegetables was served on February 7, 2025 when 3/4 cup is required daily at lunch for grades K-8. This was determined to be a repeat finding from the previous cycle and contributed toward fiscal action calculations.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at http://www.azed.gov/hns/nslp under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that daily vegetable quantities at lunch meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.</i></p> |

<p>5 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 7.75 oz equivalent of Meat/Meat Alternate was served February 3-7, 2025 when 9 oz equivalent is required weekly at lunch for grades K-8. This was determined to be a repeat finding from the previous cycle and contributed toward fiscal action calculations.</p>	<p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at http://www.azed.gov/hns/nslp under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action.</p>	<p><i>Please provide a written description of the changes that have been made to ensure that weekly Meat/Meat Alternate quantities at lunch meet minimum amounts required by the meal pattern.</i></p>
<p>6 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 7.75 oz equivalent grain was served February 3-7, 2025 when a minimum of 8 oz equivalent grain is required weekly at lunch for grades K-8. This was determined to be a repeat finding from the previous cycle and contributed toward fiscal action calculations.</p>	<p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at http://www.azed.gov/hns/nslp under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/training under the Online Training Library accordion. Please note that repeated violations involving food quantities may result in fiscal action.</p>	<p><i>Please provide a written description of the changes that have been made to ensure that weekly grain quantities at lunch meet minimum amounts required by the meal pattern.</i></p>

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

No Findings.

Meal Access & Reimbursement: Certification and Benefit Issuance

7	Direct certification matches were not conducted according the proper time frames. Specifically, direct certification was not conducted by April 1st as required for all school food authorities on an annual basis.	Discussed that direct certification must be conducted, at a minimum: at or around the beginning of the school year, three months after the beginning of the school year, and six months after the beginning of the school year. Referred to Direct Certification for Assistance Programs section in USDA's Eligibility Manual for School Meals found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion. The NSLP At A Glance Calendar for School Food Authorities can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Calendar and Checklists accordion.	<i>Please provide a written description of the changes that have been implemented to ensure direct certification will be conducted according to the proper timeframes. Additionally, please provide written assurance that, moving forward, direct certification will be run at or around April 1st each school year.</i>
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Meal Access & Reimbursement: Verification

No Findings.

Meal Access & Reimbursement: Meal Counting and Claiming

8	The site application in CNPWeb does not accurately reflect the program operations that were observed on site. Specifically, the site application indicated participation in the Afterschool Snack Program when actually Cottonwood Day School is not serving Afterschool Snack.	Discussed requirement to report current procedures to the State agency and the ability to do so through updating applications in CNPWeb and contacting the Health and Nutrition Services Specialist to alert them of the changes.	<i>Please submit a new site application in CNPWeb that accurately reflects the program operations. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i>
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Meal Pattern & Nutritional Quality: Offer Versus Serve

Not Applicable.

Meal Pattern & Nutritional Quality: Meal Components and Quantities

No Findings.

Resource Management

9	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, prices have not been evaluated since previous food service director was replaced resulting in \$3.75 being charged for lunch when a minimum of \$4.84 should be charged for lunch.	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 https://www.azed.gov/hns/nslp/forms/ 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 of non-Federal funds were used to cover the price of serving adult meals served during the review period.</i>
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General Program Compliance: Civil Rights

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| 10 The public media release was not provided to local media, the unemployment office, and/or and local employers considering large layoffs. | Discussed requirements and timeframe for public media release, and best options locally for submitting the release to prior to the start of the school year. The Public Media Release template can be found on ADE's website at https://www.azed.gov/hns/nslp/forms/ under the Organizational accordion. | <i>Please provide written procedures that will be followed each year for distributing the public media release, including who will be responsible for ensuring it is sent to the appropriate local media and what local media it will be sent to.</i> |
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General Program Compliance: SFA On-Site Monitoring

Not Applicable.

General Program Compliance: Local Wellness Policy

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| 11 The public is not being notified of the existence and contents of the Local Wellness Policy. | Discussed feasible means of notifying the public about the Local Wellness Policy such as posting it on the school website. SFA mentioned they could include announcements of the LWP at the next parent and community gatherings held at the school. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at https://www.azed.gov/hns/nslp/training 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 Local Wellness Policy.</i> |
| 12 A recent assessment of the implementation of the Local Wellness Policy 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 Local Wellness Policy, how the LEA's Local Wellness Policy 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 https://www.azed.gov/hns/nslp/forms under the Local Wellness Policy accordion. Local Wellness Policy Assessment: Making it Meaningful Webinar can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training accordion. | <i>Please provide a written plan for conducting an assessment of the implementation of the Local 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> |

General Program Compliance: Competitive Food Services

Not Applicable.

General Program Compliance: Professional Standards

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| <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 https://www.azed.gov/hns/nslp/training 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 https://www.azed.gov/hns/nslp/training 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 Full-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 6 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 https://www.azed.gov/hns/nslp/training 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 https://www.azed.gov/hns/nslp/training 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 full-time School Nutrition Program staff are registered for.</i></p> |
| <p>15 Employees outside of the School Nutrition Program with responsibilities that include duties related to the operation of the School Nutrition Program have not received applicable training nor has sufficient training been planned. Specifically, the security, school janitor, and school health tech who help with meal counting did not receive program training and training is not planned for the remainder of the school year.</p> | <p>Discussed 4 hour training requirement, employee's job duties, and applicable trainings that could be provided and feasible timeline. Training Curriculum for Arizona Child Nutrition Professionals Operating the National School Lunch and School Breakfast Program can be found on ADE's website at https://www.azed.gov/hns/nslp/training 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 https://www.azed.gov/hns/nslp/training 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 employees outside of the School Nutrition Program with responsibilities related to the operation of the School Nutrition Programs will receive.</i></p> |

16	The School Nutrition Programs director has not completed annual training on Federal procurement standards.	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 https://www.azed.gov/hns/nslp/training under the Build Your Employees Training Plans accordion. Procurement Basics training can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Please provide the certificate of completion of Procurement Basics (or an equivalent training on Federal procurement standards) for the School Nutrition Programs director. Additionally, please provide written assurance that annual training on Federal procurement standards will be completed annually.</i>
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General Program Compliance: Water

No Findings.

General Program Compliance: Food Safety, Storage and Buy American

17	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 https://www.azed.gov/hns/nslp/forms under the Food/Health Safety accordion.	<i>Please provide a copy of a written food safety plan.</i>
18	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>Please provide a photo demonstrating that the most recent food safety inspection report has been posted in a location where the program participants can view it. Additionally, please provide written assurance that it will be updated each time the school receives a food safety inspection.</i>
19	The following products observed at Cottonwood Day 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: Watermelon from Mexico.	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 https://www.azed.gov/hns/nslp/forms under the Operational accordion. Buy American Recorded Webinar and FAQ can be found on ADE's website at https://www.azed.gov/hns/nslp/training 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>

General Program Compliance: Reporting and Recordkeeping

- 20 Production record serving size is inaccurate. Discussed ensuring serving sizes reflected on production records are consistent with recipes, labels, and any pre-packaged food products served. Additionally discussed the serving size and portion section is a required element of a production record and therefore should be accurate to what was actually served during the meal service. Production record resources can be found on ADE's website at <https://www.azed.gov/hns/nslp/forms> under the Menu Planning accordion. *Please provide a written description of changes made to ensure serving size is correctly reflected on production records.*
- Specifically, the following items did not reflect correct serving size information: Homemade Salsa and Tortilla Chips.

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

No Findings.

Other Federal Program Reviews: Afterschool Snack Program

Not Applicable.

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2025 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! Cottonwood Day School has completed the administrative review for the 2024-2025 school year. It is recommended that trainings in Meal Components and Quantities are completed throughout the year. It is also recommended that internal compliance checks are conducted periodically in these critical areas to maintain program integrity. Thank you for your patience and 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?

☒ No- SBP

☐ Yes- SBP

\$59.64

☐ No- NSLP ☒ Yes- NSLP \$2,528.78

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by June 6, 2025 to Jackie Rodriguez at Jackie.Rodriguez@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.

Reviewer Signature Date

Program Director Signature Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the [School Food Authority Appeal Procedure for the Administrative Review](#) found under the Reviews Conducted by the State Agency accordion on ADE's National School Lunch and School Breakfast Program webpage.

Tom Horne, Superintendent of Public Instruction
1535 West Jefferson Street • Phoenix Arizona 85007 • www.azed.gov
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