



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Incito Schools

CTD: 07-82-10

Site: Incito Schools

Contacts: Amanda Jelleson, Executive Director and Bethany Puccio, Assistant Principal

Review Date: April 24, 2025

Exit Conference Date: April 24, 2025

Review Period: March 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			
1	Student eligibility certification was incorrectly determined. Specifically, one application listed total household members that were inconsistent with the names listed on the application. This contributed toward fiscal action calculations.	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 https://www.azed.gov/hns/nslp under the Guidance Manuals accordion. Required completing the training: Step-by-Step Instruction: How to Process Household Applications found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<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>
2	Student eligibility was determined utilizing incomplete information. Specifically, multiple applications were certified without Social Security number information.	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 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.	<i>Corrections have been made to certification errors. Please describe the process that will be implemented to ensure the completeness of household applications.</i>

Performance Standard 1: Meal Counting and Claiming – Critical Area

No findings.

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| <p>3 Food quantities observed at breakfast on the day of review did not meet minimum amounts required by the meal pattern. Specifically, 1 whole fresh orange which credits as 1/2 cup fruit according to the Food Buying Guide, was served, when 1 cup is required daily at breakfast for grades K-8. 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 http://www.azed.gov/hns/nslp under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a Breakfast 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 and/or termination of performance-based reimbursement (extra 9 cents).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that daily fruit meal component 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> |
| <p>4 Fluid milk was not available in at least two varieties throughout the breakfast and lunch meal services on the day of review. This was not a repeat finding from the previous cycle and therefore did not contribute toward fiscal action calculations.</p> | <p>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.</p> | <p><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></p> |

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

No findings.

Meal Access & Reimbursement: Certification and Benefit Issuance

No findings.

Meal Access & Reimbursement: Verification

No findings.

Meal Access & Reimbursement: Meal Counting and Claiming

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| 5 | 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 https://www.azed.gov/hns/nslp/forms under the Operational accordion. The Step-by-Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion. | A completed daily edit check worksheet for the most recently submitted claim month was provided during the on-site visit. 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. |
| 6 | The method of meal counting described in the CNPWeb sponsor application does not reflect current meal counting procedures observed on site. Specifically, the CNPWeb sponsor application described using a checklist in the lunchroom and using the ADE Form, when it was observed that class roster is the current method of meal counting. | Discussed CNPWeb sponsor application must accurately reflect current practices. Additionally, discussed steps to take to update the application. | Please update the CNPWeb sponsor application to accurately describe the method of meal counting implemented. Additionally, provide written assurance that the CNPWeb sponsor application will be updated to reflect current practices should they change. |
| 7 | The point of service described in the CNPWeb sponsor application does not reflect current point of service observed on site. Specifically, the CNPWeb sponsor application indicated that the point of service is at the end of the serving line to ensure that all students take the minimum number of required components to make a reimbursable meal; however, it was observed that the point of service was at the beginning of the line prior to each student taking a reimbursable meal. | Discussed CNPWeb sponsor application must accurately reflect current practices. Additionally, discussed steps to take to update the application. | Please update the CNPWeb sponsor application to accurately describe the point of service. Additionally, provide written assurance that the CNPWeb sponsor application will be updated to reflect current practices should they change. |
| 8 | A local meal charge policy has not been developed. Specifically, SFA does not have a policy for unpaid meals. | Discussed the that school food authorities must have a written unpaid meal charge policy and that the policy must be communicated to all families with children within the SFA and all school or district-level staff members responsible for policy enforcement. Referred memos SP 29-2017, SP 29-2017a, SP 23-2017 and HNS 14-2017, which can be found on ADE's website at https://www.azed.gov/hns/memos . | Please provide a copy of the local meal charge policy implemented. Additionally, please provide written assurance that the policy will be communicated to all families with children within the SFA and all school or district-level staff members responsible for policy enforcement. |

Meal Pattern & Nutritional Quality: Offer Versus Serve

Not applicable.

Meal Pattern & Nutritional Quality: Meal Components and Quantities

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| 9 | Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast. | Discussed feasible options for signage and potential content as well as the plan for creating and posting near the point of service. Printable reimbursable meal signage can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. | <i>Signage was provided and posted during the on-site visit. No further corrective action is required.</i> |
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Resource Management

No findings.

General Program Compliance: Civil Rights

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| 10 | The USDA nondiscrimination statement used on program materials is not the most current USDA statement. Specifically, the summer and breakfast and summer outreach materials did not contain the most current USDA nondiscrimination statement. | Discussed where to find nondiscrimination statement on ADE's website at https://www.azed.gov/hns/civilrights and whether long or short statement would be most appropriate. | <i>Please provide an updated breakfast and summer outreach material with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i> |
| 11 | 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> |
| 12 | Documentation to support that program staff have been trained on civil rights topics has not been maintained. | Discussed that program staff must complete annual civil rights training that includes the following topics: collection and use of data; effective public notification systems; complaint procedures; compliance review techniques; resolution of noncompliance; requirements for reasonable accommodation of persons with disabilities; requirements for language assistance; conflict resolution; and customer service. Additionally discussed that documentation of annual training must be maintained for a minimum of five years. Online Course: Civil Rights Compliance for Child Nutrition Operators can be found on ADE's website at https://www.azed.gov/hns/civilrights . | <i>Please provide documentation to support that all program staff have completed appropriate civil rights training. Additionally, please provide written assurance that all food service staff will be trained at hire and as needed on civil rights compliance in Child Nutrition Programs on an annual basis.</i> |
| 13 | <i>The "And Justice for All" poster displayed was smaller than the USDA specified size of 11" by 17".</i> | Discussed USDA guidance states that the "And Justice for All" poster must not be printed on paper in a size smaller than 11 x 17 inches. Referred to HNS 08-2019 USDA Nondiscrimination And Justice for All Poster Clarification. | <i>Correction has been made, and no further action needed.</i> |

General Program Compliance: SFA On-Site Monitoring

Not applicable.

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| 14 | The Local Wellness Policy did not contain all the required elements. Specifically, the Local Wellness Policy did not contain policies for food and beverage marketing or a description of public involvement, public updates, policy leadership, and evaluation plan. | Discusse updating the Local Wellness Policy to include policies that allow marketing and advertising of only those foods and beverages that meet Smart Snacks Standards during the school day. Additionally discussed that local wellness policies are required to include a description of public involvement, public updates, policy leadership, and evaluation plan. 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 plan for how a policies for food and beverage marketing will be added, a description of public involvement, public updates, policy leadership, and evaluation plan will be added to the Local Wellness Policy. The plan should include draft language of the element to be added, who will be involved in updating the Local Wellness Policy and the date the update is expected to be completed. Additionally, provide written assurance that the Local Wellness Policy will be specific to your institution.</i> |
| 15 | Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the Local Wellness Policy. Specifically, parents, students, general public, teachers of physical education, and school health professionals were not made aware of their ability to participate in the development, review, and update of the Local Wellness Policy. | Discussed feasible means of notifying potential stakeholders of their ability to participate. 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 all potential stakeholders, including [list specific stakeholders that were not made aware of their ability to participate], will be made aware of their ability to participate in the development, review, update, and implementation of the Local Wellness Policy.</i> |
| 16 | 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. SFA decided to post on school website. The USDA's Local Wellness Policy Outreach Toolkit can be found at https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit . | <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> |

General Program Compliance: Competitive Food Services

Not applicable.

General Program Compliance: Professional Standards

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| 17 The School Nutrition Programs director, management, and staff tasked with National School Lunch Program procurement responsibilities have 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, management, and staff tasked with National School Lunch Program procurement responsibilities. 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

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| 18 The written food safety plan did not contain the required elements. Specifically, the food safety plan did not contain Standard Operating Procedures for Hot and Cold Holding for Time/Temperature Control for Safety Foods when serving food, using and Calibrating Thermometer, or Standard Operating Procedures for Record Keeping when receiving food from the caterer. | Discussed that required elements for the food safety plan include: written Standard Operating Procedures (SOPs), menu items grouped according to the Process Approach, identified Critical Control Points, and established Critical Limits. Referred to Prototype (Template) Hazard Analysis Critical Control Point (HACCP) Food Safety Plan located on ADE's website at https://www.azed.gov/hns/nslp/forms under the Food/Health Safety accordion. | <i>Please provide a copy of the updated food safety plan that contains all required elements.</i> |
| 19 Temperature logs for food storage areas are not being maintained for a minimum of 6 months. Specifically, temperature logs for walk-in refrigerator, milk cooler and a two door refrigerator were not maintained for a minimum of 6 months at October 2024 to April 2025. | Discussed requirements for maintaining food storage area temperature logs, sample templates, and who would be responsible. Temperature logs for food storage areas must be maintained for 6 months. Monitoring forms can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Food/Health Safety accordion. Additionally, discussed Food Safety Online Training Library can be found on ICN's website at https://theicn.org/icn-resources-a-z/food-safety/ . | <i>Please provide a copy of the temperature log that will be used for walk-in refrigerator, milk cooler and a two door refrigerator. Additionally, please provide written assurance that logs will be kept daily and maintained on file for 6 months.</i> |

General Program Compliance: Reporting and Recordkeeping			
20	Production records did not contain all required sections. Specifically, production records for breakfast did not contain the amount of items served and amount of items left over.	Discussed required sections of production records. Production Record Templates can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. The Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Please provide copies of completed breakfast production records for 5 consecutive days. Additionally, the certificate of completion of Production Record Overview must be provided.</i>
21	Production record crediting is inaccurate. Specifically, the following items did not reflect correct crediting information: Fresh Whole Orange.	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 https://www.azed.gov/hns/nslp/forms 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>
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 on completing the Administrative Review for the 2024-2025 school year. Thank you for your hard work and cooperation during this process. You are doing a wonderful job implementing the School Nutrition Programs and it was a pleasure visiting your school. 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	\$7.35
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$32.08

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **June 19, 2025** to Amy Dixon Banire at amy.dixonbanire@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

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
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