



# ARIZONA DEPARTMENT OF EDUCATION

## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Mingus Mountain Estate Residential Center, Inc.

CTD: 13-21-16

Site: Mingus Mountain Youth Treatment Center

Contacts: Brandon Watkins, Principal and David Sapp, Food Service Director

Review Date: January 29, 2025

Exit Conference Date: January 29, 2025

Review Period: December 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
Performance Standard 1: Certification and Benefit Issuance – Critical Area			
No findings.			
Performance Standard 1: Meal Counting and Claiming – Critical Area			
No findings.			
Performance Standard 2: Meal Components & Quantities – Critical Area			
1	Fluid milk was not available in at least two allowable varieties at breakfast and lunch on the day of review. Specifically, reduced-fat, unflavored milk was provided at breakfast and lunch leaving only one allowable milk type available (low-fat, flavored milk). 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.	Please provide one week of breakfast and lunch production records that demonstrate that allowable fluid milk was available in at least two varieties. Additionally, please provide written assurance that allowable fluid milk will always be available in at least two varieties at breakfast and lunch.
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			

2	The point of service described in the CNPWeb site application does not reflect current point of service observed on site. Specifically, the CNPWeb site application described Serve Only per CNPWeb site application when it was observed during breakfast that the point of service was Offer Versus Serve.	Discussed CNPWeb sponsor application must accurately reflect current practices. Additionally, discussed steps to take to update the application.	<i>A new site application in CNPWeb that accurately reflects the alternate point of services was submitted and approved. Additionally, provide written assurance that the CNPWeb site application will be updated to reflect current practices should they change.</i>
3	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">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">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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#### Meal Pattern & Nutritional Quality: Offer Versus Serve

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4	Cafeteria staff have not been properly trained on Offer versus Serve (OVS) meal service.	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.	<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 - Breakfast Edition must be submitted.</i>
5	Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast and lunch.	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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Menu Planning accordion.	<i>Both breakfast and lunch reimbursable meal signage were posted on day of review.</i>
6	Offer versus Serve (OVS) was not implemented properly. Specifically, OVS is not being implemented at lunch for grades 9-12 and a waiver has not been submitted to the State agency demonstrating that the school system does not accommodate OVS.	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 at lunch. Additionally, please provide written assurance that moving forward, OVS will be implemented for grades 9-12 at lunch.</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 nonprogram adults were not priced in a manner that was sufficient to cover the overall cost of the meal as required. Specifically, during the review period, nonprogram adult meals were not priced in accordance with the requirements for revenue from nonprogram foods. The SFA determined by the food cost only divided by the total meals served to calculate an average price of \$3.50 per meal when the minimum requirement for School Year 2024-2025 is \$4.84 per meal.	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 (\$1.34 x 1,577) \$2,113.18 of non-Federal funds were used to cover the price of serving adult meals during the review period.</i>
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**General Program Compliance: Civil Rights**

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8	Procedures for receiving and processing complaints alleging discrimination within the school meal programs are not in place.	Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., ADE, Food & Nutrition Services Southwest Regional Office, FNS Office of Civil Rights, or USDA Office of Civil Rights). The SFA's procedures must note whether an allegation is made verbally or in person. The SFA staff member receiving the allegation must transcribe the complaint. The SFA's procedures for receiving a complaint cannot prevent a complaint from being accepted. Additionally, the SFA's procedures must not indicate that they attempt to resolve the complaint themselves nor can the SFA's complaint process be a prerequisite for accepting a complaint. Additional guidance 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 File a Civil Rights Complaint 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 process and procedures for processing complaints alleging discrimination within Federal School Meal Programs. Additionally, the certificate of completion of Step-by-Step Instruction: How to File a Civil Rights Complaint must be submitted.</i>
9	Program staff have not been trained on civil rights topics.	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 <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> .	<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>

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

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| 10 On-site monitoring of the lunch meal counting and claiming procedures for all sites within the SFA are not being conducted each year prior to February 1. Specifically, on-site monitoring was not conducted at Mingus Mountain Youth Treatment Center in School Year 2023-2024. | Discussed that every school year, each school food authority with more than one school shall perform no less than one on-site review of the counting and claiming system for each school under its jurisdiction prior to February 1. The Internal On-Site Monitoring Form - Lunch template 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. Discussed who would be responsible for completing this each year.  | <i>Please provide a completed Internal On-Site Monitoring Form of the Meal Counting and Claiming System for lunch at Mingus Mountain Youth Treatment Center. Additionally, please provide a written description of the process that has been put in place to ensure that all sites receive an on-site review of the meal counting and claiming procedures at lunch each year prior to February 1.</i>  |
| 11 On-site reviews of the breakfast meal counting and claiming procedures are not being conducted each year prior to February 1. Specifically, on-site monitoring was not conducted at Mingus Mountain Youth Treatment Center in School Year 2023-2024.                             | Discussed that every school year, school food authority with more than one school shall perform no less than one on-site review of the counting and claiming system for at least 50 percent of schools operating the School Breakfast Program under its jurisdiction prior to February 1. The Internal On-Site Monitoring Form - Breakfast template 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. Discussed who would be responsible for completing this each year. | <i>Please provide a completed Internal On-Site Monitoring Form of the Meal Counting and Claiming System for breakfast at Mingus Mountain Youth Treatment Center. Additionally, please provide a written description of the process that has been put in place to ensure that sites operating the School Breakfast Program receive an on-site review of the meal counting and claiming procedures at breakfast each year prior to February 1.</i> |

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**General Program Compliance: Local Wellness Policy**

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| 12 The Local Wellness Policy did not contain all required elements. Specifically, goals for nutrition promotion and goals for other school-based activities that promote student wellness. Additionally, the Local Wellness Policy did not contain a description of public involvement, public updates, policy leadership, and evaluation plan.   | Discussed feasible options for nutrition promotion goals that can be written into the Local Wellness Policy. Discussed activity ideas which included offering contests, surveys, promotions and/or taste testing, providing information to families to encourage consumption of healthy foods at home, and displaying nutrition and health posters throughout campus. Team Nutrition Resources can be found at <a href="http://www.teamnutrition.usda.gov/">http://www.teamnutrition.usda.gov/</a> . The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training accordion. | <i>Please provide a written plan for how specific goals for nutrition promotion, goals for other school-based activities that promote student wellness, and 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> |
| 13 Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the Local Wellness Policy. Specifically, school administrators, teachers of physical education, school health professionals, and program staff 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training accordion.  | <i>Please provide a written description of how all potential stakeholders, including school administrators, teachers of physical education, school health professionals, and program staff will be made aware of their ability to participate in the development, review, update, and implementation of the Local Wellness Policy.</i>   |

14	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 <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. 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>
15	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. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training accordion.	<i>Please provide a written description of how the public will be notified of the existence and contents of the Local Wellness Policy.</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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16	The School Nutrition Program Director hired on or 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>17 School Nutrition Programs director and manager tasked with National School Lunch Program procurement responsibilities have 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 for School Nutrition Programs director and manager 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></p>   |
| <p>18 Full-time School Nutrition Program staff did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed. Specifically, the full-time staff hired after January 1 did not meet half of the annual training requirements nor were sufficient plans developed to complete half of the annual training requirements.</p> | <p>Discussed 3 hour requirement for full-time staff hired after January 1 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 full-time School Nutrition Program staff are registered for.</i></p>  |
| <p>19 Professional Standards training hours are not being tracked on an annual basis.</p>  | <p>Referred to USDA's Professional Standards Training Tracker Tool and to ADE's Training Tracking forms 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 Professional Standards accordion. Additionally discussed ability to create a custom training tracker with all required elements. 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 written assurance that Professional Standards training hours will be tracked for all School Nutrition Program staff on an annual basis. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</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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| 20 | Production record crediting is inaccurate. Specifically, the following items did not reflect correct crediting information: Chicken Fajitas, Southwest Chicken Salad, Southwest Salad with Cheese Breadstick, and the Yogurt Parfait. | 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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| 21 | Outreach to families regarding the availability of the School Breakfast Program (SBP) was not conducted at the beginning of the school year. | Discussed methods of notifying families of the availability of the School Breakfast Program (SBP) at the start of the school year. Additionally, discussed SBP outreach should include: serving times, locations where breakfast is available, and SBP costs.  | <i>Please provide a written description of how households will be notified of the availability of the School Breakfast Program at the beginning of the school year, including the documentation that will be used for the notification. Additionally, please provide written assurance that this will occur at the beginning of each school year.</i>     |
| 22 | Households were not notified of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year.              | Discussed methods of notifying families of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year and determined which was most feasible. Summer feeding locations can be found at <a href="https://www.azhealthzone.org/">https://www.azhealthzone.org/</a> . | <i>Please provide a written description of how households will be notified of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year, including the documentation that will be used for the notification. Additionally, please provide written assurance that this will occur at the end of each school year.</i> |

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

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| 23 | Production records and other documentation do not support that all snacks counted for reimbursement contained two different components. Specifically, documentation indicated that no creditable components were served on December 2, 3, 4, 5, and 7 2024. This contributed towards fiscal action calculations. | Discussed the meal pattern requirements of the ASP and the requirement that a snack must contain two components if it is to be claimed for reimbursement. The ASP meal pattern chart can be found on ADE's website at <a href="https://www.azed.gov/hns/afterschool">https://www.azed.gov/hns/afterschool</a> under the Meal Pattern accordion. | <i>Please provide Afterschool Snack Program (ASP) production records for 5 consecutive days that demonstrate that each snack provided to students contains at least two components. Additionally, please provide written assurance that all snacks claimed for reimbursement will contain at least 2 different components.</i>                                |
| 24 | An Afterschool Snack Program (ASP) monitoring review was not conducted twice during the school year. Specifically, no monitoring of the ASP was conducted in School Year 2023-2024 at Mingus Mountain Youth Treatment Center.  | Discussed Afterschool Snack Program (ASP) monitoring requirements. A sample ASP monitoring form 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.   | <i>Please provide written steps that will be taken to ensure that the Afterschool Snack Program will be monitored twice each school year, including the individual responsible for completing the monitoring review. Additionally, please provide written assurance that documentation of monitoring reviews will be maintained for a minimum of 5 years.</i> |

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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! Mingus Mountain Youth Treatment Center has completed the administrative review for the 2024-2025 school year. Thank you for your hospitality, organization, and sense of urgency during the review process. Your team works marvelously together in order to do an outstanding job implementing the Child Nutrition Programs. It is evident that you are working hard to ensure your students are fed healthy, delicious meals in a supportive environment.

**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	\$0
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$383.57

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by May 5, 2025, to Liz McLaughlin at [Liz.McLaughlin@azed.gov](mailto:Liz.McLaughlin@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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