



# ARIZONA DEPARTMENT OF EDUCATION

## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Show Low Unified District

CTD: 09-02-10

Site: Nikolaus Homestead Elementary School

Contacts: Joe Farnsworth, Superintendent and Robyn Hubbard, Foodservice Director

Review Date: April 30, 2025

Exit Conference Date: April 30, 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
<b>Performance Standard 1: Certification and Benefit Issuance – Critical Area</b>			
1	Student eligibility was determined utilizing incomplete information. Specifically, 2 applications with 4 students were certified as free utilizing invalid case numbers.	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 <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals accordion. Required completing the training: Step-by-Step Instruction: How to Process Household Applications 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>Corrections have been made to certification errors. Please describe the process that will be implemented to ensure the completeness of household applications. Additionally, the certificate of completion of Step-by-Step Instruction: How to Process Household Applications must be submitted.</i>

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

No Findings.

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**Performance Standard 2: Meal Components & Quantities – Critical Area**

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| <p>2 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 5 oz eq meat/meat alternate was served each week in the month of March (3/325-3/6/35, 3/17/25-3/20/25, 3/24/25-3/27/25) when 6.5 oz eq meat/meat alternate is required weekly at lunch for grades K-5. This was not a repeat finding from the previous cycle and therefore did not contribute toward fiscal action calculations.</p> | <p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a 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. The Using Appropriate Serving Utensils Recorded Webinar &amp; Webinar Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion. 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 M/MA 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> |
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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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| <p>3 Direct verification procedures were not followed correctly. Specifically, direct verification was conducted on the entire student population.</p> | <p>Discussed requirement to conduct direct verification only on selected applications prior to contacting households. Additionally, discussed how to conduct direct verification in ADEConnect CNP Direct Certification/Direct Verification. Referred to Step-by-Step Instruction: How to Conduct Direct Verification in CNP Direct Certification/Direct Verification 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. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised 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.</p> | <p><i>Please provide written procedures that will be implemented during verification to ensure that direct verification will only be conducted on applications selected for verification.</i></p> |
| <p>4 Verification activities were not completed by November 15. Specifically, direct verification was not run until January 9, 2025.</p>               | <p>Discussed requirement for completion of verification activities by November 15, including the notification of verification results. Referred to Verification Best Practices Calendar and Online Training: Verification Review found at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Calendars and Checklists accordion.</p>   | <p><i>Please provide written assurance that verification will be completed by November 15 each year, as well as the steps that will be taken to ensure this requirement is adhered to.</i></p>    |

Meal Access & Reimbursement: Meal Counting and Claiming		
No Findings.		
Meal Pattern & Nutritional Quality: Offer Versus Serve		
No Findings.		
Meal Pattern & Nutritional Quality: Meal Components and Quantities		
No Findings.		
Resource Management		
5	Operating losses as the result of bad debt from unpaid student meal accounts were not restored by non-Federal revenues. Specifically, \$973.25 of encumbered bad debt from unpaid student meal accounts at the end of School Year 2023-2024 was not restored by non-Federal revenues.	<p>Discussed that when local officials determine further collection efforts for delinquent debt are useless or too costly, the debt must be reclassified as “bad debt.” Once a delinquent debt is reclassified as a bad debt, it must be written off as an operating loss and restored using non-Federal funds. The nonprofit school food service account may not be used to cover costs related to the bad debt, such as continued legal and collection costs. Instead, these losses must be restored using non-Federal funds. These funds may come from the school district’s general fund, special funding from State or local governments, or any other non-Federal sources. Referred to USDA Memo SP 23-2017: Unpaid Meal Charges: Guidance and Q&amp;A.</p> <p><i>Please provide a written policy for calculating and restoring bad debt from unpaid student meal accounts. Additionally, please provide supporting documentation which reflects that the amount of bad debt encumbered in School Year 2023-2024 was restored to the nonprofit school food service account using non-Federal funds.</i></p>
General Program Compliance: Civil Rights		
6	The public media release was not provided to local media, the unemployment office, and/or local employers considering large layoffs.	<p>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 <a href="https://www.azed.gov/hns/nslp/forms/">https://www.azed.gov/hns/nslp/forms/</a> under the Organizational accordion.</p> <p><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></p>
7	Households are not made aware of Limited English Proficiency (LEP) services provided by the school food authority.	<p>Discussed requirement that once aware of an LEP individual’s needs, the LEA is responsible for ensuring that their application and other household materials are available in the language the LEP individual can understand. Referred to SP 37-2016 which can be found on ADE’s Memos webpage at <a href="https://www.azed.gov/hns/memos">https://www.azed.gov/hns/memos</a>.</p> <p><i>Notification of free language assistance was added to the food service webpage during the on-site review. No further corrective action is required.</i></p>

8	Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, complaints are handled internally when they should be sent to an outside agency.	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>The updated process and procedures for processing complaints alleging discrimination which meets requirements was updated on the food service webpage during the on-site review. No further corrective action is required.</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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9	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, representatives of the school food authority, the school board, school administrators, general public, teachers of physical education, and/or 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. Also discussed feasible means for notifying stakeholders such as posting the notice on the food service webpage. 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 parents, students, representatives of the school food authority, the school board, school administrators, general public, teachers of physical education, and/or school health professionals, will be made aware of their ability to participate in the development, review, update, and implementation of the Local Wellness Policy.</i>
10	The public was not notified of the results of the most recent assessment of the implementation of the Local Wellness Policy.	Discussed requirement to make the most recent assessment available to the public. Also discussed feasible means for notifying the public of the results of the most recent assessment on the implementation of the Local Wellness Policy such as posting it on the school website. The USDA's Local Wellness Policy Outreach Toolkit can be found at <a href="https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit">https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit</a> .	<i>The results of the most recent assessment of the implementation of the Local Wellness Policy were posted on the food service website during the on-site review. No further corrective action is required.</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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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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No Findings.

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**General Program Compliance: Reporting and Recordkeeping**

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| 11 | Production record crediting is inaccurate. Specifically, the following item did not reflect correct crediting information: Egg, Cheese, and Turkey Ham Breakfast Burrito. | 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. | 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. |
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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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| 12 | Production records do not support that the Afterschool Snack Program (ASP) meal pattern was met. Specifically, insufficient fruit/vegetable quantities were served on 3/3/25 through 3/5/25. Specifically, only 1/2 cup fruit/vegetable was served when 3/4 cup is required for afterschool snack. | Discussed the meal pattern requirements of the ASP. 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. | Please provide Afterschool Snack Program (ASP) production records for 5 consecutive days that demonstrate that the ASP meal pattern requirements have been met. Additionally, please provide written assurance that the ASP meal pattern will be adhered to at all times. |
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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! Show Low Elementary District 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 National School Lunch Program, School Breakfast Program, and Afterschool Snack Program. 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	\$26.95
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$124.31

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by June 30, 2025 to Megan Hoovler at [Megan.Hoovler@azed.gov](mailto:Megan.Hoovler@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.