



# ARIZONA DEPARTMENT OF EDUCATION

## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Gilbert Unified District

CTD: 07-02-41

Site: Boulder Creek Elementary, Gilbert Classical Academy 7-12, Harris Elementary School and Pioneer Elementary School

Contacts: Dr. Shane McCord, Superintendent and Bonnie Betz, Assistant Superintendent

Review Date: January 28-31, 2025

Exit Conference Date: January 31, 2025

Review Period: December 2024

Programs Reviewed:

National School Lunch  
 Fresh Fruit & Vegetable

School Breakfast  
 Special Milk

Afterschool Snack  
 At-Risk Afterschool Meals

No.	Review Observations & Findings	Technical Assistance Provided	Required Corrective Action
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#### Performance Standard 1: Certification and Benefit Issuance – Critical Area

No findings

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

No findings

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

No findings

#### 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

1 An incorrect number of applications were selected for verification based on the sampling method used. Specifically, 59 of application should have been verified using the Standard sampling method, but 60 were actually verified during verification in School Year 2024-2025.	Discussed correct calculation of sample size and which applications are subject to verification. Referred to the Verification Sample Size Calculators located in CNP Verification Reporting and Online Training: Verification Review found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> . 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.	<i>Please provide written procedures for how the verification sample size will be determined in the future.</i>
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**Meal Access & Reimbursement: Meal Counting and Claiming**

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| 2 | Alternate points of service that have not been approved by the State agency were observed while on site. Specifically, Grab N' Go breakfast carts was observed on site at Harris Elementary School when Breakfast in the Classroom was approved in the CNPWeb site application for Harris Elementary School. | Discussed requirement to receive approval from the State agency prior to implementing alternate points of service and the ability to do so through updating the site application in CNPWeb and contacting the Health and Nutrition Services Specialist to alert them of the changes. | <i>Harris Elementary School's CNPWeb site application has been updated to reflect Grab 'N' Go for breakfast. No further action is required.</i> |
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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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*No findings*

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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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| 3 | Indirect costs were incorrectly calculated. Specifically, the correct indirect cost rate was applied to an incorrect direct cost base. Calculation utilized incorrect figures for Other Food, USDA Commodities, and Total Expenditures, which resulted in an incorrect Direct Cost Base of \$7,640.325,81, instead of \$7,770.286.72.   | Discussed proper classification of direct/indirect costs. Reviewed requirements that indirect costs be charged consistently across the SFA as required in 2 CFR 200.412-414. Referred to the USDA's Indirect Cost Guidance Manual located at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals accordion, which can be used as a resource when determining allowable indirect costs.   | <i>Please provide the calculation or tool that will be used to determine the amount of indirect costs charged to the nonprofit school food service account.</i>  |
| 4 | 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, adult breakfasts were priced at \$2.75 and adult lunches were priced at \$4.75 at Harris Elementary School, a non-pricing site, when the Adult Meal Pricing Tool for Non-Pricing Sites indicated a minimum of \$2.84 for adult breakfasts and a minimum of \$4.82 for adult lunches. | 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. For Pricing Sites: the paid meal price plus the amount of reimbursement received for a paid meal plus the per meal value of entitlement and bonus commodities for 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 supporting that the difference between adult meal price charged and the required adult meal prices throughout the month of December 2024 at Harris Elementary School has been restored to nonprofit school food service account using non-Federal funds.</i> |

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**General Program Compliance: Civil Rights**

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*No findings*

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

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*No findings*

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**General Program Compliance: Local Wellness Policy**

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*No findings*

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**General Program Compliance: Competitive Food Services**

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*No findings*

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**General Program Compliance: Professional Standards**

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*No findings*

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**General Program Compliance: Water**

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*No findings*

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**General Program Compliance: Food Safety, Storage and Buy American**

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*No findings*

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**General Program Compliance: Reporting and Recordkeeping**

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| 5 | Reports are not submitted to the State agency as required. Specifically, the submitted site application in CNPWeb indicated that Pioneer Elementary School is serving Preschool students when the site is not serving Preschool students. | Discussed steps required to update the site application in CNPWeb to reflect current practice of not operating Preschool, including notifying the assigned specialist approving applications of the update. | <i>Corrections have been made to site application in CNPWeb. Please provide written assurance that the site application in CNPWeb will be updated to accurately reflect current practices whenever site operations change.</i> |
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**General Program Compliance: School Breakfast Program and Summer Food Service Program Outreach**

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*No findings*

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

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*Not applicable*

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**Other Federal Program Reviews: Seamless Summer Option**

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Will be reviewed in Summer 2025 if applicable.

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**Other Federal Program Reviews: Fresh Fruit and Vegetable Program**

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*Not applicable*

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**Other Federal Program Reviews: Special Milk Program**

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*Not applicable*

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**Other Federal Program Reviews: At-Risk Afterschool Meals**

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*Not applicable*

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Comments/Recommendations:

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Congratulations! Gilbert Unified 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 to do an extraordinary job implementing the National School Lunch Program and School Breakfast Program. It is evident that you are working hard to ensure your students are feed a variety of healthy and delicious meas 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?

No- SBP       Yes- SBP      \$0  
 No- NSLP       Yes- NSLP      \$0

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by April 4, 2025 to Berenice Camacho Castaneda, [Berenice.CamachoCastaneda@azed.gov](mailto:Berenice.CamachoCastaneda@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)  
“We are a service organization committed to raising academic outcomes and empowering parents.”

This institution is an equal opportunity provider.