



# ARIZONA DEPARTMENT OF EDUCATION

## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Immaculate Conception School

CTD: 14-20-02

Site: Immaculate Conception School

Contacts: Sherri Dhal, Superintendent and Gustavo Trujillo, School Food Director

Review Date: March 17, 2025

Exit Conference Date: March 17, 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
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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, 2 applications should have been verified using the Alternate 1 sampling method, but 4 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.	Please provide written procedures for how the verification sample size will be determined in the future.
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2 Documentation to support that a confirmation review took place prior to any other verification activity was not maintained.	Discussed how to document the confirmation review by using the 'Office Use Only' section on household applications. Discussed requirement for having a designated individual separate from the initial eligibility determination confirm the eligibility of an application selected for verification. Referred to The 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> under the Online Training Library accordion. Additionally, referred to Verification Tracking Form found on ADE's website at <a href="http://www.azed.gov/hns/nslp/forms">http://www.azed.gov/hns/nslp/forms</a> under the Eligibility Documents for School Meal Benefits accordion.	<i>Please provide written procedures for how the confirmation review will be conducted, including the individual (title) who will be responsible for conducting the confirmation review and how it will be documented. Additionally, please provide written assurance that all applications selected for verification will undergo this process.</i>
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**Meal Access & Reimbursement: Meal Counting and Claiming**

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3 A local meal charge policy has not been developed.	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 <a href="https://www.azed.gov/hns/memos">https://www.azed.gov/hns/memos</a> .	<i>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.</i>
4 Daily edit checks are not being conducted appropriately. Specifically, the attendance factor on the daily edit check does not match the attendance factor on the monthly reimbursement claims.	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 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 the attendance factor reflected on the daily edit check worksheet will be updated annually.</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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| 5 | The Financial Management System utilized was insufficient to accurately identify and track all expenditures of the nonprofit school food service program. Specifically, salaries/benefits, food/milk purchases, utilities and communications, furniture/equipment, vehicles/trans. equipment, and other expenditures were not provided to support figures reported on the Food Service Annual Financial Report.   | Discussed feasibility for designating a separate financial account for the nonprofit school food service, as well as the requirement to differentiate revenues and expenditures of the nonprofit school food service program if a separate account cannot be designated. Discussed the importance of establishing a financial management system and internal controls needed to accurately track all revenues and expenditures of the nonprofit school food service program.  | <i>Please provide a written description of steps that will be taken to ensure all revenues and expenditures of the nonprofit school food service account are easily identifiable as required in 7 CFR 210.14.</i>  |
| 6 | After assessing compliance with revenue from nonprogram foods, the SFA did not take additional steps to sufficiently increase its nonprogram food prices, add sufficient non-Federal funds to its nonprofit school food service account, or other actions to adequately resolve the problem when its revenue ratio was less than its food cost ratio.   | Discussed that assessing compliance with revenue from nonprogram foods requirements ensures that revenues from the sales of nonprogram foods generate at least the same proportion of SFA revenues as they contribute to SFA food costs. Referred to Nonprogram Food Revenue Tool & Calculator 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 documentation to support that nonprogram food prices have been increased to an appropriate level, sufficient non-Federal funds have been added to the nonprofit school food service account, and/or other actions to adequately resolve the problem were taken.</i>  |
| 7 | 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 breakfast was priced at \$2.50 when the Adult Meal Pricing Tool for Pricing Sites indicated a minimum of \$2.70 for adult breakfast. | Discussed ways to determine adult meal prices which included a per meal cost analysis and pricing utilizing the Adult Meal Pricing Tool. 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 February 2025 at Immaculate Conception 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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*Not applicable*

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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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8 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>Food safety certification was completed on 9/14/23. No further corrective action is required.</i>
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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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9 Reports are not submitted to the State agency as required. Specifically, the submitted sponsor application in CNPWeb indicated that school meal application provided by ADE was being utilized when sponsor is utilizing electronic/online school meal application.	Discussed steps required to update the sponsor application in CNPWeb to reflect current practice of electronic/online school meal application, including notifying the assigned specialist approving applications of the update.	<i>Please resubmit a sponsor application in CNPWeb indicating the current practice of electronic/online school application. Additionally, please provide written assurance that the sponsor application in CNPWeb will be updated to accurately reflect current practices whenever program operations change.</i>
10 Production record crediting is inaccurate. Specifically, the following items did not reflect correct crediting information: breakfast donut.	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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*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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