



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Rough Rock School Board, Inc.

CTD: 01-40-01

Site: Rough Rock High School

Contacts: Corena Owen, Business Manager and Crystal Wheeler, Lead Cook

Review Date: April 16, 2025

Exit Conference Date: April 16, 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
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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

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| 1 | Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 1/2 cup fruit was served on March 4, 5, & 6, 2025, when 1 cup is required daily at lunch for grades 9-12. This was deemed a systemic error and also occurred on March 10, 11, 12, 13, 24, 25, 26, 27, & 31, 2025. This was not a repeat finding from the previous cycle and therefore did not contribute toward fiscal action calculations. | 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 http://www.azed.gov/hns/nslp under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a Lunch 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. | <i>Please provide a written description of the changes that have been made to ensure that daily fruit 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. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.</i> |
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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, 7/8 cup vegetable was served on March 5, and 1/2 cup vegetable was served on March 6, 2025, when 1 cup is required daily at lunch for grades 9-12. 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 http://www.azed.gov/hns/nslp under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a Lunch 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.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that daily vegetable quantities at lunch meet minimum amounts required by the meal pattern.</i></p> |
| <p>3 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 2 1/2 cups fruit was served the week of March 3-6, 2025, when 4 cups are required weekly at lunch for grades 9-12. This was deemed a systemic error and also occurred during the weeks of March 10-13 and March 24 -27, 2025. 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 http://www.azed.gov/hns/nslp under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a Lunch 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.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that weekly fruit quantities at lunch meet minimum amounts required by the meal pattern.</i></p> |

<p>4 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 5/8 cup Other Vegetables was served the week of March 3-6, 2025, when 3/4 cup is required weekly at lunch for grades 9-12. <i>This was a repeat finding from the previous cycle and therefore contributed toward fiscal action calculations.</i></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 http://www.azed.gov/hns/nslp under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a Lunch 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.</p>	<p><i>Please provide a written description of the changes that have been made to ensure that weekly Other vegetable subgroups quantities at lunch meet minimum amounts required by the meal pattern.</i></p>
<p>5 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 3 5/8 cups vegetables were served the week of March 3-6, 2025, when 4 cups are required weekly at lunch for grades 9-12. 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 http://www.azed.gov/hns/nslp under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a Lunch 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.</p>	<p><i>Please provide a written description of the changes that have been made to ensure that weekly vegetable quantities at lunch meet minimum amounts required by the meal pattern.</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

6	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 lunch 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. Please provide written assurance that the CNPWeb site application will be updated to reflect current practices should they change.</i>
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Meal Pattern & Nutritional Quality: Offer Versus Serve

No findings

Meal Pattern & Nutritional Quality: Meal Components and Quantities

No findings

Resource Management

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 did not use a method to determine adult meal price of \$4.50 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 https://www.azed.gov/hns/nslp/forms/ 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 (\$0.34 x 28) \$9.52 of non-Federal funds were used to cover the price of serving adult meals during the review period.</i>
8	Documentation was not provided to support the usage of Supply Chain Assistance funds and a plan was not provided for the use of \$32,827.77 Supply Chain Assistance funds.	Discussed that the attestation statement signed by the SFA detailed that the SFA will use Supply Chain Assistance (SCA) funds only for purchasing unprocessed or minimally processed domestic food products and that SFAs are required to maintain purchasing and other related records for review and audit purposes. Referred to SP 03-2022: Allocation of Supply Chain Assistance (SCA) Funds to Alleviate Supply Chain Disruptions in the School Meal Programs located on ADE's website at https://www.azed.gov/hns/memos .	<i>Please provide documentation demonstrating how the \$32,827.77 of Supply Chain Assistance funds were spent and or a plan for how any remaining funds will be spent. Additionally, provide a written description of how documentation of expenses will be maintained.</i>

General Program Compliance: Civil Rights

No findings

General Program Compliance: SFA On-Site Monitoring

No findings

General Program Compliance: Local Wellness Policy

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| 9 | The Local Wellness Policy did not contain all required elements. Specifically, the Local Wellness Policy did not contain a description of policy leadership. | 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 description of policy leadership 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> |
| 10 | 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, and general public, 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 parents, students, and general public, will be made aware of their ability to participate in the development, review, update, and implementation of the Local Wellness Policy.</i> |

General Program Compliance: Competitive Food Services

No findings

General Program Compliance: Professional Standards

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| 11 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 https://theicn.org/icn-resources-a-z/food-safety/ . | <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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General Program Compliance: Water

No findings

General Program Compliance: Food Safety, Storage and Buy American

No findings

General Program Compliance: Reporting and Recordkeeping

No findings

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! Rough Rock School Board 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?

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| <input checked="" type="checkbox"/> No- SBP | <input type="checkbox"/> Yes- SBP |
| <input type="checkbox"/> No- NSLP | <input checked="" type="checkbox"/> Yes- NSLP \$994.26 |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by July 24, 2025, to Liz McLaughlin at 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.

Reviewer Signature Date

Program Director 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
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This institution is an equal opportunity provider.