



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: San Carlos Unified District

CTD: 04-02-20

Site: San Carlos Middle School

Contacts: Deborah Dennison Superintendent and Shelly Fuller, Food Service Director

Review Date: February 26, 2025

Exit Conference Date: February 26, 2025

Review Period: January 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
Performance Standard 1: Certification and Benefit Issuance – Critical Area			
	No finding.		

Performance Standard 1: Meal Counting and Claiming – Critical Area

No finding.

Performance Standard 2: Meal Components & Quantities – Critical Area

1	Food quantities served at lunch for grades 6-8 during the review period did not meet minimum amounts required by the meal pattern. Specifically, 1/4 cup of Dark Green vegetable vegetable was served during the week of review when 1/2 cup is required weekly at lunch for grades 6-8. 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 Dark green vegetable subgroup quantities at lunch meet minimum amounts required by the meal pattern.</i>
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2	Food quantities served at lunch for grades 6-8 during the review period did not meet minimum amounts required by the meal pattern. Specifically, 1/2 cup Red/Orange vegetable was served during the week of review when 3/4 cups is required weekly at lunch for grades 6-8. 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 Red/Orange vegetable subgroup quantities at lunch meet minimum amounts required by the meal pattern.</i>
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Performance Standard 2: Dietary Specifications and Nutrient Analysis – Critical Area

No finding.

Meal Access & Reimbursement: Certification and Benefit Issuance

No finding.

Meal Access & Reimbursement: Verification

No finding.

Meal Access & Reimbursement: Meal Counting and Claiming

3	Daily edit checks at San Carlos Middle School are not being conducted appropriately. Specifically, daily edit check provided by SFA had an attendance factor of 84.79% when the attendance factor in CNPWeb is 81.89%.	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 https://www.azed.gov/hns/nslp/forms under the Operational accordion. The Step-by-Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Please provide a completed daily edit check worksheet for the most recently submitted claim month for San Carlos Middle School. 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

No finding.

Meal Pattern & Nutritional Quality: Meal Components and Quantities

No finding.

Resource Management

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| 4 | Compliance with the revenue from nonprogram food requirements via either the Nonprogram Food Revenue Tool or 5-Day Reference Period as described in FNS Policy Memo SP 20-2016 was not assessed. | 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 https://www.azed.gov/hns/nsfp/forms/ under the Financial accordion. | Please complete and submit either the USDA Nonprogram Food Revenue Tool or 5-Day Reference Period to support compliance with revenue from nonprogram food requirements. |
| 5 | 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 lunches are priced at \$4.75 when they should be priced at \$4.84. | 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 https://www.azed.gov/hns/nsfp/forms/ under the Financial accordion. | 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 \$0.45 of non-Federal funds were used to cover the price of serving adult meals served during the review period. |

General Program Compliance: Civil Rights

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| 6 | The USDA nondiscrimination statement used on program materials is not the most current USDA statement. Specifically, the Summer Feeding outreach and Parent Letter for School meals did not contain the most current USDA nondiscrimination statement. | Discussed where to find nondiscrimination statement on ADE's website at https://www.azed.gov/hns/civilrights and whether long or short statement would be most appropriate. | Please provide an updated Summer Feeding outreach with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language. |
| 7 | The Civil Rights Compliance Form, specific to School Nutrition Programs is not being completed every year by December 15 and kept on file. | Discussed requirement for completing form and how to collect racial/ethnic data from program participants. The form can be found on ADE's website at https://www.azed.gov/hns/civilrights . The Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form can be found on ADE's website at https://www.azed.gov/hns/nsfp/training under the Online Training Library accordion. | Please provide a written description of how the Civil Rights Compliance form will be completed by December 15 each year and maintained, including the individual who will be responsible for completing the form. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form must be submitted. |

General Program Compliance: SFA On-Site Monitoring

No finding.

General Program Compliance: Local Wellness Policy

No finding.

General Program Compliance: Competitive Food Services

No finding.

General Program Compliance: Professional Standards

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| 8 | Professional Standards training hours are not being adequately tracked. Specifically, there is no comprehensive tracking system in place. Employee trainings are received through a variety of sources (in person and through multiple software programs) and while these records are kept separately there is no system to combine trainings and ensure that hours are met per employee annually. | Discussed feasibility of different tracking methods for the school year. Suggested creating their own training tracker with all required information or upgrading current software system which does provide a sufficient tracking report. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion. | Please provide a written description of how Professional Standards training hours will be tracked and utilized to ensure that all School Nutrition Program staff meet their training requirements. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided. |
| 9 | The School Nutrition Programs director has not completed annual training on Federal procurement standards. | 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 https://www.azed.gov/hns/nslp/training under the Build Your Employees Training Plans accordion. Procurement Basics training can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion. | Please provide the certificate of completion of Procurement Basics (or an equivalent training on Federal procurement standards) for the School Nutrition Program director. Additionally, please provide written assurance that annual training on Federal procurement standards will be completed annually. |

General Program Compliance: Water

No finding.

General Program Compliance: Food Safety, Storage and Buy American

No finding.

General Program Compliance: Reporting and Recordkeeping

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| 10 | Production record crediting is inaccurate. Specifically, fruit and vegetable contributions served at breakfast and lunch on the day of review February 26, 2025 were recorded in ounces when meal pattern contributions for fruit and vegetables are measured in cups. | 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 https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. | <i>Please provide a production record that reflects the correct crediting information for fruit and vegetable. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on production records.</i> |
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General Program Compliance: School Breakfast Program and Summer Food Service Program Outreach

No finding.

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:

The review of San Carlos Unified School District's operations was a positive experience. The systems in place to support compliance are strong and noteworthy. To improve further, it is recommended that the district create a system to track staff training—especially in production recordkeeping and the crediting of vegetables and vegetable subgroups. It is also advised to conduct yearly internal checks on revenue from nonprogram foods to ensure continued compliance.

The fruit and vegetable bar offered to students was especially impressive. To help avoid future issues with vegetable subgroup crediting, it is recommended that staff keep daily records of the items served.

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	\$0.00
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$0.00

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by May 12, 2025 to Ana Gandarilla-Begay at Ana.gandarilla-begay@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
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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
“We are a service organization committed to raising academic outcomes and empowering parents.”

This institution is an equal opportunity provider.