



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Tonto Basin Elementary District

CTD: 04-03-33

Site: Tonto Basin Elementary

Contacts: Barbara Warren, Superintendent and Kandie Dahlgren Food Service Director

Review Date: March 31, 2025

Exit Conference Date: March 31, 2025

Review Period: February 3-6, 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			
1	Meal eligibility was not extended to all members of a household when one person in that household matched in SNAP in direct certification. Specifically, one student in the household matched for free benefits through SNAP; however, their sibling was recorded as reduced on the benefit issuance document utilized at the point of service. This contributed toward fiscal action calculations.	Discussed that meal benefits are only extended to children in the same household as an individual currently certified to receive Assistance Program (SNAP, FDPIR, TANF, or Medicaid) benefits. Referred to Assistance Program Participants in The Direct Certification Process section in USDA's Eligibility Manual for School Meals found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion.	<i>Corrections have been made to certification errors. Please describe the process that will be implemented to ensure that only eligibility benefits from an Assistance Program (SNAP/TANF/FDPIR/Medicaid) will be extended to children who are members of the household.</i>
2	Multiple denied applications were denied incorrectly. Specifically, three students were documented as paid on the benefit issuance document (BID) and point of service (POS), when all three should have received reduced benefits based off of an income application.	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 https://www.azed.gov/hns/nslp under the Guidance Manuals accordion. The Step-by-Step Instruction: How to Process Household Applications can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.	<i>Corrections have been made to the certification status. Please describe the process that will be implemented to reduce the amount of errors that occur while determining the eligibility status for each student. Additionally, the certificate of completion of Step-by-Step Instruction: How to Process Household Applications must be submitted.</i>

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| <p>3 In one instance, the eligibility determined was not transferred correctly to the benefit issuance document. Specifically, a student was certified as free on the Direct Certification list, but recorded as reduced on the BID. This contributed toward fiscal action calculations.</p> | <p>Discussed best practices for ensuring eligibility status is transferred to the benefit issuance document on a regular basis. The Step-by-Step Instruction: How to Create a Benefit Issuance Document (BID) can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.</p> | <p><i>Corrections have been made to the benefit issuance document. Please provide a written description of the process that will be implemented to ensure that the benefit issuance document matches all current students and their eligibility status. Additionally, the certificate of completion of Step-by-Step Instruction: How to Create a Benefit Issuance Document (BID) must be submitted.</i></p> |
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Performance Standard 1: Meal Counting and Claiming – Critical Area

No finding.

Performance Standard 2: Meal Components & Quantities – Critical Area

No finding.

Performance Standard 2: Dietary Specifications and Nutrient Analysis – Critical Area

No finding.

Meal Access & Reimbursement: Certification and Benefit Issuance

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| <p>4 The benefit issuance document is not being updated in a timely manner to reflect changes in eligibility. withdrawn students. Specifically, 2 students remained on BID although they had withdrawn from the school.</p> | <p>Discussed potential changes that can be made to system to ensure that updates are made in a timely manner. Additionally, discussed that schools must make a determination and notify the household of its eligibility status within 10 days of receiving the application. The Step-by-Step Instruction: How to Create a Benefit Issuance Document (BID) can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion.</p> | <p><i>Please provide written procedures for updating the benefit issuance document to reflect changes in eligibility for withdrawn students in a timely manner.</i></p> |
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Meal Access & Reimbursement: Verification

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| 5 | The person designated as the verification confirming official is the same person who made the initial eligibility determination. | Discussed that the confirmation review must be done by an individual other than the individual who made the initial eligibility determination. The Online Training: Verification Review found on ADE's website at https://www.azed.gov/hns/nslp/training 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 https://www.azed.gov/hns/nslp under the Guidance Manuals accordion. | <i>Please provide the name and title of the individual designated as the confirming official. Additionally, please provide written assurance that the person designated as the confirming official will not be the same person who made the initial eligibility determination.</i> |
| 6 | Verification procedures were not followed correctly. Specifically, households for whom benefits were to be reduced or terminated as a result of verification were not provided 10 calendar days advance notification prior to the actual reduction or termination. | Discussed that if benefits are decreased during verification, SFAs must provide 10 days advance notification to households prior to the actual reduction or termination of benefits. Referred to ADE's Verification Tracking Form and Online Training: Verification Review on ADE's website at https://www.azed.gov/hns/nslp/training 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 https://www.azed.gov/hns/nslp under the Guidance Manuals accordion. | <i>Please provide the written procedures for ensuring that households for whom benefits are to be reduced or terminated will be given 10 calendar days written advance notice of the change.</i> |
| 7 | Verification activities were not completed by November 15. Specifically, households were not notified of the results of verification until January 27, 2025. | 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 https://www.azed.gov/hns/nslp/forms under the Calendars and Checklists accordion. | <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> |

Meal Access & Reimbursement: Meal Counting and Claiming

No finding.

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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| 8 | 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/nslp/forms/ under the Financial accordion. | <i>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.</i> |
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General Program Compliance: Civil Rights

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| 9 | The USDA nondiscrimination statement used on program materials is not the most current USDA statement. Specifically, the Notification of Benefits Letter 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. | <i>Please provide an updated Notification of Benefits Letter with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i> |
| 10 | Sufficient services are not provided to Limited English Proficient (LEP) households. | 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 https://www.azed.gov/hns/memos . | <i>Please describe the services that will be available to LEP households henceforth.</i> |

General Program Compliance: SFA On-Site Monitoring

Not applicable

General Program Compliance: Local Wellness Policy

11	A recent assessment of the implementation of the Local Wellness Policy has not been conducted nor have plans been developed to complete the assessment.	Discussed requirement to complete an assessment once every three years, at a minimum. The assessment must measure how the LEA is complying with their Local Wellness Policy, how the LEA's Local Wellness Policy compares to the model wellness policy, and progress made in attaining the goals of the wellness policy. Additionally, discussed feasible means for notifying the public of the results of the most recent assessment. Sample evaluation tools can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Local Wellness Policy accordion. Local Wellness Policy Assessment: Making it Meaningful 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 conducting an assessment of the implementation of the Local Wellness Policy. This plan must include who will be designated as the oversight official, who will be invited to participate in the assessment process, and the date by which the assessment is expected to be completed.</i>
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General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

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| 12 | 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> |
| 13 | 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. | <i>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.</i> |
| 14 | The School Nutrition Programs director has have 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. | <i>Please provide the certificate of completion of Procurement Basics (or an equivalent training on Federal procurement standards) for the School Nutrition Programs director. Additionally, please provide written assurance that annual training on Federal procurement standards will be completed annually.</i> |

General Program Compliance: Water

No finding.

General Program Compliance: Food Safety, Storage and Buy American

No finding.

General Program Compliance: Reporting and Recordkeeping

No finding.

General Program Compliance: School Breakfast Program and Summer Food Service Program Outreach

15	Households were not notified of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year.	Discussed methods of notifying families of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year and determined which was most feasible. Summer feeding locations can be found at https://www.azhealthzone.org/ .	<i>Please provide a written description of how households will be notified of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year, including the documentation that will be used for the notification. Additionally, please provide written assurance that this will occur at the end of each school year.</i>
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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:

Thank you for participating in the National School Lunch Program and School Breakfast Program. The efforts of Tonto Basin Elementary District to support student nutrition are appreciated. To enhance program operations and strengthen compliance, it is recommended that the district establish formal training plans for all staff involved in the administrative and operational aspects of the Child Nutrition Programs.

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 30, 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
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