



ARIZONA DEPARTMENT OF
EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Bullhead City School District

CTD: 08-04-15

Site: Coyote Canyon School
Fox Creek Jr High School

Contacts: Dr. Carolyn Stewart, Superintendent
Cassandra Peluso, Administrative Assistant

Review Date: October 21-22, 2025

Exit Conference Date: October 22, 2025

Review Period: September 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

<p>1 Meals served to preschool students at Coyote Canyon School did not meet meal pattern requirements. Specifically, low-fat and/or fat-free milk was served to 1-year-old preschool students at breakfast and lunch on September 2-4, 8-11, 15-18, 22-25, & 29-30, 2025, and on the day of review, October 21, 2025. This contributed toward fiscal action calculations.</p>	<p>Discussed the updated preschool meal pattern. Specifically, that low fat and fat free milk is not allowable for 1 year olds.. Referred to SP 01-2018 Updated Infant and the updated preschool meal patterns in the National School Lunch Program and School Breakfast Program; Questions and Answers. CACFP Meal Pattern can be found on ADE's website at https://www.azed.gov/hns/cacfp under the Meal Pattern accordion.</p>	<p><i>Please provide one week of breakfast/lunch production records that demonstrate that allowable fluid whole milk was served to preschool students at Coyote Canyon School. Additionally, please provide written assurance that low-fat and fat-free milk will not be served to 1-year-old preschool students.</i></p>
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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

No Findings.

Meal Pattern & Nutritional Quality: Offer Versus Serve

No Findings.

Meal Pattern & Nutritional Quality: Meal Components and Quantities

No Findings.

Resource Management

No Findings.

General Program Compliance: Civil Rights

No Findings.

General Program Compliance: SFA On-Site Monitoring

No Findings.

General Program Compliance: Local Wellness Policy

2 The Local Wellness Policy did not contain all required elements. Specifically, the Local Wellness Policy did not contain policies for food and beverage marketing.	Discussed updating the Local Wellness Policy to include policies that allow marketing and advertising of only those foods and beverages that meet Smart Snacks Standards during the school day. Explained that this requirement applies to exterior vending machines, posters, menu boards, coolers, trash cans and cups used for beverage dispensing. 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 n policies for food and beverage marketing 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>
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3 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.

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.

General Program Compliance: Competitive Food Services

No Findings.

General Program Compliance: Professional Standards

No Findings.

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

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| 4 | Production records and other documentation do not support that all snacks counted for reimbursement contained two different components. Specifically, Nurtigrain Strawberry Bar, a non-creditable, unallowable grain-based dessert that was served on September 18, 2025, at Coyote Canyon School and Fox Creek Jr High School, and documentation indicated that only one component (fruit) was served. This contributed towards fiscal action calculations. | Discussed the meal pattern requirements of the ASP and the requirement that a snack must contain two components if it is to be claimed for reimbursement. Discussed grain-based desserts such as cookies, sweet pie crusts, doughnuts, cereal bars, breakfast bars, granola bars, sweet rolls, toaster pastries, cakes, and brownies are not creditable as part of the reimbursable meal but may be served as an extra meal item. The ASP meal pattern chart can be found on ADE's website at https://www.azed.gov/hns/afterschool under the Meal Pattern accordion. | <i>Please provide Afterschool Snack Program (ASP) production records from Coyote Canyon School and Fox Creek Jr High School for 5 consecutive days that demonstrate that each snack provided to students contains at least two creditable components. Additionally, please provide written assurance that all snacks claimed for reimbursement will contain at least 2 creditable components.</i> |
| 5 | Production records and other documentation do not support that all snacks counted for reimbursement contained three different components at Coyote Canyon School. Specifically, infants were served one component (fruit/vegetable) when three components (breastmilk and/or formula, meat/meat alternate, and fruit/vegetable) are required for infant snacks. This contributed towards fiscal action calculations. | Discussed the meal pattern requirements of the ASP when serving infants and the requirement that a snack must contain three components if it is to be claimed for reimbursement. Referred to the Infant Meal Pattern Chart and Feeding Infants in the CACFP Guide found on ADE's website at https://www.azed.gov/hns/cacfp/programfor ms/ under the Feeding Infants section. | <i>Please provide Infant Afterschool Snack Program (ASP) production records from Coyote Canyon School for 5 consecutive days that demonstrate that each snack provided to students contains at least two creditable components. Additionally, please provide written assurance that all snacks claimed for reimbursement will contain at least 3 creditable components.</i> |

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2026 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 your collaboration during the administrative review for program year 2025–2026. It was a pleasure working with your team on-site; each staff member demonstrated a genuine commitment to nourishing students, and that dedication was evident in every interaction. I encourage you to explore the Professional Standards Trainings and Tracker Tool, which offers a variety of resources to support your continued growth, especially in understanding and implementing age-appropriate meal patterns.

I was especially impressed by the use of family-style feeding in each classroom I visited. The children clearly enjoyed the experience, and it fostered a positive, engaging mealtime environment. Also, that Broccoli Ranch salad was a standout; I'm confident it will be a favorite!

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		
Program	Total Fiscal Action	Assessed or Disregarded
School Breakfast Program	\$182.28	Disregarded
National School Lunch Program	\$927.66	Assessed

Please submit corrective action response by **December 21, 2025** to Danielle Kirksey at Danielle.Kirksey@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.