



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Naco Elementary District

CTD: 02-03-23

Site: Naco Elementary School

Contacts: Jonathan Watts, Superintendent and Kimberly Coutts, Cafeteria Manager

Review Date: January 21, 2026

Exit Conference Date: January 21, 2026

Review Period: December 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

1	Breakfast cereals provided to students during the review period exceeded the allowable added sugar limits. Specifically, Honey Nut Cheerios served on December 2, 2025 contained 9.5 grams of added sugar per dry ounce when no more than 6 grams of added sugars per dry ounce is allowable.	Discussed that beginning July 1, 2025, breakfast cereals may have no more than 6 grams of added sugars per dry ounce. Referred to USDA's Added Sugars webpage at https://www.fns.usda.gov/cn/school-nutrition-standards-updates/added-sugars .	<i>Please provide the Nutrition Facts label for the product that will replace Honey Nut Cheerios. Additionally, please provide written assurance that all breakfast cereals provided to students will contain no more than 6 grams of added sugars per dry ounce.</i>
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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

Not applicable.

Meal Pattern & Nutritional Quality: Meal Components and Quantities

No findings.

Resource Management

No findings.

General Program Compliance: Civil Rights

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| 2 | The USDA nondiscrimination statement used on program materials is not the most current USDA statement. Specifically, the menus 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 menus with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i> |
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General Program Compliance: SFA On-Site Monitoring

Not applicable.

General Program Compliance: Local Wellness Policy

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| 3 | The Local Wellness Policy did not contain all required elements. Specifically, the Local Wellness Policy did not contain policies for 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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<p>4 A recent assessment of the implementation of the Local Wellness Policy has not been conducted nor have plans been developed to complete the assessment.</p>	<p>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. Discussed plan to use ADE templates for the assessment of the LWP. 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.</p>	<p><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></p>
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General Program Compliance: Competitive Food Services

Not applicable.

General Program Compliance: Professional Standards

<p>5 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.</p>	<p>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.</p>	<p><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></p>
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| 6 | The School Nutrition Programs director and Business Manager 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 and staff tasked with National School Lunch Program procurement responsibilities. Additionally, please provide written assurance that annual training on Federal procurement standards will be completed annually.</i> |
| 7 | 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> |

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

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| 8 | The following products observed at Naco Elementary School were in violation of the Buy American Provision (i.e., were non-domestic) and documentation justifying a Buy American exception were not maintained on file: Mandarin Oranges, Pineapples (Indonesia), Jalapenos (Mexico). | Discussed that funds used from the nonprofit school food service account must be used to procure food products that comply with the Buy American Provision. Additionally discussed procedures for documenting a Buy American exception. Referred to SP 09-2025, Buy American Accommodation Process for School Year 2025-2026. Additional information on the requirements of this provision, including the Buy American Exemption Summary Tool, can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational accordion. | <i>Please provide a written description of the changes that have been made to procurement and/or recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i> |
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General Program Compliance: Reporting and Recordkeeping

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| 9 | Production record crediting is inaccurate. Specifically, the following items did not reflect correct crediting information: Banana Bar, French Toast Bar, Honey Nut Cheerios, Drumstick, Pizza. | 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 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> |
| 10 | Records have not been retained for 5 years after the final claim for reimbursement for the fiscal year has been submitted or until resolution of any audits. Specifically, SFA did not have any records related to the program on file before school year 2024-2025. | Discussed that Arizona has a retention requirement of 5 years for documentation relating to Federal programs. Additionally discussed that documentation must be retained until the resolution of any audits. | <i>Please provide a written policy describing the retention procedures that will be implemented.</i> |
| 11 | Reports are not submitted to the State agency as required. Specifically, the submitted site application in CNPWeb indicated that Naco Elementary School is serving meals to Pre-K when the site does not have Pre-K students enrolled. | Discussed steps required to update the site application in CNPWeb to reflect current practice of Pre-K student participation, including notifying the assigned specialist approving applications of the update. | <i>Please resubmit a site application for Naco Elementary School in CNPWeb indicating the current practice of Pre-K student participation. Additionally, please provide written assurance that the site application in CNPWeb will be updated to accurately reflect current practices whenever site operations change.</i> |

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

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| 12 | Outreach to families regarding the availability of the School Breakfast Program (SBP) was not conducted at the beginning of the school year. | Discussed methods of notifying families of the availability of the School Breakfast Program (SBP) at the start of the school year. Additionally, discussed SBP outreach should include: serving times, locations where breakfast is available, and SBP costs. | <i>Please provide a written description of how households will be notified of the availability of the School Breakfast Program at the beginning 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 beginning of each school year.</i> |
| 13 | 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> |

Other Federal Program Reviews: Afterschool Snack Program

Not applicable.

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:

Congratulations! Naco Elementary District has completed the administrative review for the 25-26 school year. Thank you for your hospitality and organization during the review process. It is evident that you are working hard to ensure your students are fed healthy meals in a welcoming 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		
Program	Total Fiscal Action	Assessed or Disregarded
School Breakfast Program	\$0.00	Not Applicable
National School Lunch Program	\$0.00	Not Applicable

Please submit corrective action response by March 2, 2026 to Keith Daly at keith.daly@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 _____

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
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