



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Palo Verde Elementary District

CTD: 07-04-49

Site: Palo Verde Elementary School

Contacts: Robert Aldridge, Superintendent and Mary Mogen, Food Service Director

Review Date: March 25, 2026

Exit Conference Date: March 25, 2026

Review Period: February 2026

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

Not applicable.

Performance Standard 1: Meal Counting and Claiming – Critical Area

No findings.

Performance Standard 2: Meal Components & Quantities – Critical Area

<p>1 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 6.75 oz eq meat/meat alternate was served on February 3-6, 2026 when 7.0 oz eq is required weekly at lunch for grades K-8. 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.</p>	<p><i>Please provide a written description of the changes that have been made to ensure that weekly meat/meat alternate quantities at lunch meet minimum amounts required by the meal pattern.</i></p>
	<p>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 in the Menu Planning/ Meal Pattern section.</p>	
<p>2 Meals served to preschool students did not meet requirements. Specifically, the following unallowable grain-based dessert were served to preschool students on February 4, 2026: Mini Donuts. This contributed toward fiscal action calculations.</p>	<p>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. Referred to SP 01-2018 Updated Infant and Preschool Meal Patterns in the National School Lunch Program and School Breakfast Program; Questions and Answers.</p>	<p><i>Please provide one week of breakfast production records which demonstrates that allowable grain items were served to preschool students. Additionally, please provide a written description of the changes that have been made to ensure grain-based dessert items will not be served to preschool students.</i></p>

Meal pattern requirements for CACFP can be found on ADE's website at <https://www.azed.gov/hns/cacfp> under the Meal Pattern accordion.

Team Nutrition Training: Grain-Based Desserts in the CACFP can be found on ADE's website at <https://www.azed.gov/hns/cacfp/cacfptraining> under the Nutrition Virtual Trainings accordion.

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

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| <p>3 Daily edit checks are not being conducted appropriately. Specifically, the attendance factor on the daily edit check does not match the attendance factor on the monthly reimbursement claims.</p> | <p>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.</p> <p>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 in the Counting & Claiming section.</p> | <p><i>Please provide a completed daily edit check worksheet for the most recently submitted claim month. Additionally, please provide written assurance that the attendance factor reflected on the daily edit check worksheet will be updated annually.</i></p> |
| <p>4 Daily edit checks are not being conducted appropriately. Specifically, students were divided by eligibility status when the site is operating under the Community Eligibility Provision.</p> | <p>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.</p> <p>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 in the Counting & Claiming section.</p> | <p><i>Please provide a completed daily edit check worksheet for the most recently submitted claim month. 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></p> |

5 Meals counted for reimbursement during a field trip are not served and recorded through an adequate point of service.	Discussed that meals provided during field trips must be served through an adequate point of service that documents students who received reimbursable meals on the field trip. Additionally discussed that preorder or attendance counts are not acceptable methods of obtaining meal counts.	<i>Please provide a written description of procedures that have been implemented when providing meals for field trips, including how the meals will be counted and claimed.</i>
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Meal Pattern & Nutritional Quality: Offer Versus Serve

No findings.

Meal Pattern & Nutritional Quality: Meal Components and Quantities

6 Offer versus Serve (OVS) was implemented at breakfast for preschool students who were not comingled with other grade groups.	Discussed preschool meal service requirements. Specifically, Offer versus Serve (OVS) is not allowable for preschoolers who are not co-mingled with other grade groups. 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.	<i>Please provide a written description demonstrating how the correct meal service (i.e., serve only or family style) will be implemented for preschool students. Additionally, please provide written assurance that moving forward, OVS will not be implemented for preschool students.</i>
	Additional resources for the updated preschool meal pattern can be found at https://www.azed.gov/hns/cacfp/programfor.ms/ in the Building a Menu section.	

Resource Management

7 Indirect costs were incorrectly calculated. Specifically, the correct indirect cost rate was applied to an incorrect direct cost base. This did not result in excess charges to the nonprofit school food service account.	Discussed proper classification of direct/indirect costs. Reviewed requirements that indirect costs be charged consistently across the SFA as required in 2 CFR 200.412-414. Referred to the USDA's Indirect Cost Guidance Manual located at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion, which can be used as a resource when determining allowable indirect costs.	<i>Please provide the calculation or tool that will be used to determine the amount of indirect costs charged to the nonprofit school food service account.</i>
8 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, SFA is charging \$2.50 for breakfast when the minimum price of \$3.25 should be charged. SFA is charging \$5.00 for lunch when the minimum price of \$5.02 should be charged.	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 \$13.49 of non-Federal funds were used to cover the price of serving adult meals served during the review period.</i>

General Program Compliance: Civil Rights

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| 9 | The USDA nondiscrimination statement not printed on appropriate program materials. Specifically, the menu did not include the 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 menu with the nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated to include the appropriate nondiscrimination statement.</i> |
| 10 | Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, SFA complaint procedures indicates that complaints are resolved within the district rather than forwarding to an outside agency. | Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., ADE, Food & Nutrition Services Southwest Regional Office, FNS Office of Civil Rights, or USDA Office of Civil Rights). The SFA's procedures must note whether an allegation is made verbally or in person. The SFA staff member receiving the allegation must transcribe the complaint. The SFA's procedures for receiving a complaint cannot prevent a complaint from being accepted. Additionally, the SFA's procedures must not indicate that they attempt to resolve the complaint themselves nor can the SFA's complaint process be a prerequisite for accepting a complaint. Additional guidance can be found on ADE's website at https://www.azed.gov/hns/civilrights . The Step-by-Step Instruction: How to File a Civil Rights Complaint 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 the updated process and procedures for processing complaints alleging discrimination which meets requirements. Additionally, the certificate of completion of Step-by-Step Instruction: How to File a Civil Rights Complaint must be submitted.</i> |

General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

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| 11 | The Local Wellness Policy did not contain all required elements. Specifically, the Local Wellness Policy did not contain goals for nutrition promotion or policies for food and beverage marketing. | Discussed feasible options for nutrition promotion goals that can be written into the Local Wellness Policy. Discussed activity ideas which included offering contests, surveys, promotions and/or taste testing, providing information to families to encourage consumption of healthy foods at home, and displaying nutrition and health posters throughout campus. Additionally 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 specific goals for nutrition promotion and 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> |
| 12 | The recent assessment of the implementation of the Local Wellness Policy did not meet the Final Rule requirements. Specifically, the assessment did not determine compliance with the wellness policy and progress made in attaining the goals of the wellness policy. | Discussed requirement to complete an assessment once every three years, at a minimum. The assessment must determine compliance with the wellness policy, how the wellness policy compares to model wellness policies, 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, including determining compliance with the wellness policy and progress made in attaining the goals of the 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> |

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

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| 13 | Production record crediting is inaccurate. Specifically, the following items did not reflect correct crediting information: fruit served February 3-6, 2026 during breakfast, juice served February 3-6, 2026 during breakfast, Pop tart served February 3, 2026 and February 6, 2026 during breakfast, cereal served February 4, 2026 and February 5, 2026 during breakfast, and peanut butter and jelly sandwich served February 3-6, 2026 during lunch. | 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 one full operating week demonstrating that it is no longer included.</i> |
| 14 | Production records provided do not indicate different offerings for different grade groupings. Specifically, the site provides different items for preschool, K-4, and 5-8 at breakfast, and the breakfast production records do not specify what is provided to each grade grouping. Additionally, preschool is not comingled at breakfast and lunch and separate production records are not kept to document compliance with the CACFP meal pattern. | Discussed using multiple production records or the Production Record for Multiple Grade Groupings found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion. | <i>Please provide copies of completed breakfast and lunch production records for one full operating week demonstrating that offerings for each grade grouping are documented separately. Additionally, the certificate of completion of Production Record Overview must be provided.</i> |
| 15 | Production records were not completed appropriately. Specifically, the production records for breakfast did not specify whether cereal or cereal bars were provided each day and did not specify what type of cereal or Pop-Tart were provided when cereals and Pop-Tarts of varying grain contributions were provided. | Discussed required sections of production records and importance of specifying items served to document meal pattern compliance. Production Record Templates can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Menu Planning accordion. The Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion. | <i>Please provide copies of completed breakfast production records for one full operating week demonstrating that breakfast offerings are specified.</i> |

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

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| 16 | Sufficient outreach to families regarding the availability of the School Breakfast Program (SBP) was not conducted at the beginning of the school year. Specifically, documentation was not provided to show that families were notified of the details of the School Breakfast Program. | 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 the updated documentation that will be used when notifying families of the availability of the School Breakfast Program (SBP). Additionally, please provide written assurance that families will be notified of the availability of the SBP at the beginning 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 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! Palo Verde Elementary District has completed the Administrative Review for the 2025-2026 program year. Thank you for your hospitality throughout the review process. It is recommended that the critical areas of the program are monitored internally to ensure ongoing compliance.

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	\$20.58	Disregarded
National School Lunch Program	\$0.00	Not Applicable

Please submit corrective action response by May 5, 2026 to Samantha Herzog at Samantha.Herzog@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

Tom Hirono, Superintendent of Public Instruction
1535 West Jefferson Street • Phoenix Arizona 85007 • www.azed.gov
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