



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Litchfield Elementary District

CTD: 07-04-79

Sites: Barbara B. Robey Elementary School, Corte Sierra Elementary School and Western Sky Middle School

Contacts: Dr. Carter Davidson , Superintendent and Dr. Mary Venable, Director

Review Dates: March 17-19, 2026

Exit Conference Date: March 19, 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

No findings.

Performance Standard 1: Meal Counting and Claiming – Critical Area

No findings.

Performance Standard 2: Meal Components & Quantities – Critical Area

1	On the day of review, it was observed that 6 lunches counted for reimbursement did not contain all of the required meal components at Western Sky Middle School. Specifically, 6 lunches were missing 1/2 fruit or vegetable. This contributed toward fiscal action calculations and resulted in termination of performance-based reimbursement (extra 9 cents) until sufficient corrective action is received.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. The Recognizing a Reimbursable Meal at the Point of Service 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 in the Operations section.	<i>Please provide a written description of the changes that have been made to ensure that all lunches counted for reimbursement contain all of the required meal components. Additionally, the certificate of completion of Recognizing a Reimbursable Meal at the Point of Service must be submitted.</i>
		The Recognizing a Reimbursable Meal at the Point of Service Webinar Slides can also be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion in the Operations section.	

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| <p>2 On the day of review, it was observed that breakfasts counted for reimbursement did not contain all of the required meal components at Barbara B. Robey Elementary School. Specifically, 4 breakfast were missing 1/2 fruit or vegetable. This contributed toward fiscal action calculations.</p> | <p>4 Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue. Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. The Recognizing a Reimbursable Breakfast Meal at the Point of Service Recorded Webinar can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion in the Operations section.</p> <p>The Recognizing a Reimbursable Breakfast Meal at the Point of Service Webinar Slides can also be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion in the Operations section.</p> | <p><i>Please provide a written description of the changes that have been made to ensure that all breakfasts counted for reimbursement contain all of the required meal components.</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

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| <p>3 Meals counted for reimbursement during a field trip are not served through an adequate point of service.</p> | <p>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.</p> | <p><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></p> |
| <p>4 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 for Barbara B. Robey Elementary School, Corte Sierra Elementary School, and Western Sky Middle School.</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><i>Please provide a completed daily edit check worksheet for the most recently submitted claim month for Barbara B. Robey Elementary School, Corte Sierra Elementary School, and Western Sky Middle School. Additionally, please provide written assurance that the attendance factor reflected on the daily edit check worksheet will be updated annually.</i></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.

Meal Pattern & Nutritional Quality: Offer Versus Serve

No findings.

Meal Pattern & Nutritional Quality: Meal Components and Quantities

No findings.

Resource Management

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| 5 Indirect costs were incorrectly calculated. Specifically, the correct indirect cost rate was applied to an incorrect direct cost base, due to an inaccurate total expenditure amount and inaccurate food cost amount used in the direct cost base calculation. As a result, the SFA calculated allowable indirect costs as \$505,163.31, which did not exceed the allowable indirect cost amount. | 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> |
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General Program Compliance: Civil Rights

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| 6 The public media release was not provided to local media, the unemployment office, and/or and local employers considering large layoffs. | Discussed requirements and timeframe for public media release, and best options locally for submitting the release to prior to the start of the school year. The Public Media Release template can be found on ADE's website at https://www.azed.gov/hns/nslp/forms/ under the Organizational accordion. | <i>Please provide written procedures that will be followed each year for distributing the public media release, including who will be responsible for ensuring it is sent to the appropriate local media and what local media it will be sent to.</i> |
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General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

- 7 The Local Wellness Policy did not contain all required elements. Specifically, the Local Wellness Policy did not contain goals for nutrition promotion.
- 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. Team Nutrition Resources can be found at <http://www.teamnutrition.usda.gov/>. 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.
- Please provide a written plan for how specific goals for nutrition promotion 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.*
- 8 Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the Local Wellness Policy. Specifically, parents, students, and the general public, were not made aware of their ability to participate in the development, review, and update of the Local Wellness Policy.
- Discussed feasible means of notifying potential stakeholders of their ability to participate. SFA decided to inform potential stakeholders through newsletter and the district website. 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.
- Please provide a written description of how all potential stakeholders, including parents, students, and the general public, will be made aware of their ability to participate in the development, review, update, and implementation of the Local Wellness Policy.*
- 9 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

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| 10 The school fundraisers were not in compliance with HNS 20-2019: Revision to Arizona Department of Education Policy on Specially Exempted Fundraisers. Specifically, fundraisers involving food and/or beverages that do not meet Smart Snacks Standards were conducted during the school day at Barbara B. Robey Elementary School, without submitting the request to the State agency. | Discussed that all exemption requests for fundraisers conducted during the school day (defined as the midnight before to 30 minutes after the school day) must be submitted to the State agency. Referred to HNS 20-2019: Revision to Arizona Department of Education Policy on Specially Exempted Fundraisers that can be found on ADE's website at https://www.azed.gov/hns/memos . The Online Course: Smart Snacks and Competitive Foods Standards in Arizona 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 procedures that will be followed when conducting a school sponsored fundraiser involving food and/or beverages. Additionally, the certificate of completion of Online Course: Smart Snacks and Competitive Foods Standards in Arizona must be submitted.</i> |
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General Program Compliance: Professional Standards

No findings.

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

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| 11 The following products observed Barbara B. Robey Elementary School, were in violation of the Buy American Provision (e.g., were non-domestic) and documentation justifying a Buy American exception were not maintained on file for the following items: Sun Cup juices (contain concentrations from Poland, Spain, Ukraine, Austria, Argentina, Chile, Mexico, China and/or Turkey). | 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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| 12 Reports are not submitted to the State agency as required. Specifically, the submitted site application in CNPWeb indicated that Corte Sierra Elementary School is implementing the NSLP meal pattern for At-Risk Supper; however, the CACFP meal pattern is implemented. | Discussed steps required to update the site application in CNPWeb to reflect current practice of CACFP meal patter for At-Risk Supper, including notifying the assigned specialist approving applications of the update. | <i>Please resubmit a site application for Corte in CNPWeb indicating the current practice of CACFP meal pattern. Additionally, please provide written assurance that the site application in CNPWeb will be updated to accurately reflect current practices whenever site operations change.</i> |
| 13 Production records did not contain all required sections. Specifically, the breakfast and lunch production records for Barbara B. Robey Elementary School and Corte Sierra Elementary School and the lunch production records for Western Sky Middle School did not contain portion size per serving. | Discussed required sections of production records. 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 and lunch production records for 5 consecutive days for Barbara B. Robey Elementary School and Corte Sierra Elementary School, and lunch production records for 5 consecutive days for Western Sky Middle School. Additionally, the certificate of completion of Production Record Overview must be provided.</i> |

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

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| 14 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> |
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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

<p>15 Production records do not support that the At-Risk Afterschool Meals served meet meal pattern requirements. Specifically, 1.5 oz eq of meat/meat alternate is required for ages 3-5, and 2 oz eq meat/meat alternate is required for ages 6-12; however, the SFA only served 1 oz eq of meat/meat alternate during the month of the review on February 2, 2026, and February 5, 2026.</p>	<p>Discussed the meal pattern requirements of At-Risk Afterschool Meals. The meal pattern chart can be found on ADE's website at https://www.azed.gov/hns/afterschool under the Meal Pattern accordion. Step-by-Step Instruction: How to Plan a Supper Menu Using the CACFP Meal Pattern can be found on ADE's website at https://www.azed.gov/hns/afterschool/trainingforSFAs under the How-To Guides accordion.</p>	<p><i>Please provide copies of completed At-Risk Afterschool Meals production records for 5 consecutive days. Additionally, please provide written assurance that the At-Risk Afterschool Meals meal pattern will be adhered to at all times. Additionally, the certificate of completion for Step-by-Step Instruction: How to Plan a Supper Menu Using the CACFP Meal Pattern must be provided.</i></p>
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Comments/Recommendations:

Congratulations on the successful completion of your Administrative Review! Your dedication, preparation, and collaborative approach throughout the process were truly commendable. You are making a meaningful impact through your implementation of the National School Lunch Program, and it was a pleasure to visit your schools. Your continued commitment to excellence is helping to shape a brighter future for the students you serve—thank you for all that you do. To further strengthen program operations and support ongoing compliance, the following best-practice recommendations are encouraged:

Point of Service (POS) Procedures

Reinforce the requirement that each reimbursable meal must include a minimum of three meal components, one of which must be at least ½ cup of fruit or vegetable. Meals that do not meet these requirements must not be claimed for reimbursement.

Visual Aids and Tools

Utilize clear visual aids at the point of service to help staff and students easily identify required components and portion sizes, supporting accurate meal selection and claiming.

“Stop and Correct” Process

Implement a structured “stop and correct” procedure to ensure incomplete meals are addressed before students exit the serving area and before meals are counted at the point of service. These enhancements will help reinforce strong internal controls, promote accurate meal counting and claiming, and ensure students consistently receive complete, nutritious meals each day.

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	\$6.68	Disregarded
National School Lunch Program	\$563.50	Disregarded

