



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Oracle Elementary District
CTD: 11-03-02
Site: Mountain Vista School

Contacts: Crystle Nehrmeyer, Superintendent and Chasity Brownrigg, Food Service Director

Review Date: February 18, 2026

Exit Conference Date: February 18, 2026

Review Period: January 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

1	Meal count totals were not correctly combined and recorded at breakfast and lunch during the review period. This was deemed a non-systemic error and contributed toward fiscal action calculations.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue.	<i>Please provide a written description of changes to the system that have been implemented to ensure that meal count totals are correctly combined and recorded, including the date of implementation.</i>
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Performance Standard 2: Meal Components & Quantities – 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

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| 2 | 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, \$4.00 was charged for adult lunches when a minimum of \$5.015 should be charged for adult lunches. | 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 \$18.27 of non-Federal funds were used to cover the price of serving adult meals served during the review period.</i> |
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General Program Compliance: Civil Rights

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| 3 | Procedures for receiving and processing complaints alleging discrimination within the school meal programs do not meet requirements. Specifically, complaints are investigated and handled internally when Civil Rights complaints are required to be forwarded to an approved third party. | 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> |
| 4 | The USDA nondiscrimination statement used on program materials is not the most current USDA statement. Specifically, the procedures for complaints 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 procedures for complaints with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i> |

General Program Compliance: SFA On-Site Monitoring

Not Applicable.

General Program Compliance: Local Wellness Policy

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| 5 | The Local Wellness Policy did not contain all required elements. Specifically, the Local Wellness Policy did not contain policies for food and beverage marketing, a description of policy leadership, and a description of public updates. | 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. Additionally, discussed that local wellness policies are required to include a description of public involvement, public updates, policy leadership, and evaluation plan. 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 policies for food and beverage marketing, a description of policy leadership, and a description of public updates will be added to the Local Wellness Policy. The plan should include draft language of the elements 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> |
| 6 | The public was not notified of the results of the most recent assessment of the implementation of the Local Wellness Policy. | Discussed requirement to make the most recent assessment available to the public. Also discussed feasible means for notifying the public of the results of the most recent assessment on the implementation of the Local Wellness Policy. The SFA noted updating the school website as a method of notifying the public when assessments are completed. The USDA's Local Wellness Policy Outreach Toolkit can be found at https://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit . | <i>Please provide the notification provided to the public of the results of the most recent assessment of the implementation of the Local Wellness Policy. Additionally, please provide written assurance that the public will be notified of results each time the Local Wellness Policy is assessed.</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

<p>7 The following products observed at Mountain Vista 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: blueberries, product of Mexico.</p>	<p>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.</p>	<p><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></p>
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General Program Compliance: Reporting and Recordkeeping

<p>8 Production record crediting is inaccurate. Specifically, the following items did not reflect correct crediting information: Cheese Omelet, Sausage Links, Breakfast Cereal Bar, French Toast Sticks, Biscuit and Gravy, Craisins, Twisted Queso Meatball Sub, Orange Chicken, Dinner Roll, Chicken, Sloppy Joes, Nachos, Roasted California Blend, Beef and Broccoli, and Orange.</p>	<p>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.</p>	<p><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></p>
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General Program Compliance: School Breakfast Program and Summer Food Service Program Outreach

<p>9 Households were not notified of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year.</p>	<p>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/.</p>	<p><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></p>
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Other Federal Program Reviews: Afterschool Snack Program

<p>10 Snack counts were not correctly combined and recorded during the review period. This contributed 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.</p>	<p><i>Please provide a written description of changes to the system that have been implemented to ensure that snack count totals are correctly combined and recorded, including the date of implementation.</i></p>
<p>11 Production records do not support that the Afterschool Snack Program (ASP) meal pattern was met. Specifically, 1/2 cup of fruit was served when 3/4 cup fruit/vegetable is required at snack.</p>	<p>Discussed the meal pattern requirements of the ASP. The ASP meal pattern chart can be found on ADE's website at https://www.azed.gov/hns/afterschool under the Meal Pattern accordion.</p>	<p><i>Please provide Afterschool Snack Program (ASP) production records for 5 consecutive days that demonstrate that the ASP meal pattern requirements have been met. Additionally, please provide written assurance that the ASP meal pattern will be adhered to at all times.</i></p>

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| 12 An Afterschool Snack Program (ASP) monitoring review was not conducted within the first four weeks of operation. | Discussed Afterschool Snack Program (ASP) monitoring requirements. A sample ASP monitoring form can be found on ADE's website at https://www.azed.gov/hns/nslp/forms under the Operational accordion. | <i>Please provide written steps that will be taken to ensure that the Afterschool Snack Program will be monitored once within the first four weeks of operation, including the individual responsible for completing the monitoring review. Additionally, please provide written assurance that documentation of monitoring reviews will be maintained for a minimum of 5 years.</i> |
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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! Oracle Elementary District has completed the administrative review for the 2025-2026 school year. It is recommended that trainings in Meal Counting, Local Wellness Policy, and Afterschool Snack Program are completed throughout the year. It is also recommended that internal compliance checks are conducted periodically in these critical areas to maintain program integrity. Thank you for your cooperation during the review process.

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	Disregarded
National School Lunch Program	\$29.52	Disregarded

Please submit corrective action response by April 17, 2026 to Jackie Rodriguez at Jackie.Rodriguez@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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