



**ARIZONA DEPARTMENT OF  
EDUCATION**

**Health and Nutrition Services Division**

**Administrative Review Summary Report**

School Food Authority Name: Palominas Elementary School District 49

CTD: 02-03-49

Site: Coronado Elementary School

**Contacts:**

Review Date: December 16, 2025

Exit Conference Date: December 16, 2025

Review Period: November 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**

1	<p>Student eligibility certification was incorrectly determined. Specifically, one application was certified as free when the reported income qualified for reduced price meal benefits. This contributed toward fiscal action calculations.</p>	<p>Discussed errors found and required corrective action. Referred to Processing Applications, Reviewing Applications Based on Income, Assessing Completeness of Categorically Eligible Applications, Determining Eligibility for Categorically Eligible Applications section(s) in USDA's Eligibility Manual for School Meals found on ADE's website at <a href="https://www.azed.gov/hns/nslp">https://www.azed.gov/hns/nslp</a> under the Guidance Manuals accordion in the USDA Manuals and Handbooks section.</p>	<p><i>Please provide an updated benefit issuance document demonstrating the date that this correction was made. Please describe the process that will be implemented to reduce the amount of errors that occur while determining the eligibility status for each student.</i></p>
2	<p>The eligibility for one student was not transferred correctly to the benefit issuance document. Specifically, a student matched in direct certification as Medicaid reduced but was listed on the benefit issuance document as free. This contributed toward fiscal action calculations.</p>	<p>Discussed best practices for ensuring eligibility status is transferred to the benefit issuance document on a regular basis. The Step-by-Step Instruction: How to Create a Benefit Issuance Document (BID) can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion in the Certification and Benefit Issuance section.</p>	<p><i>Please provide an updated benefit issuance document demonstrating the date that this correction was made. Please provide a written description of the process that will be implemented to ensure that the benefit issuance document matches all current students and their eligibility status.</i></p>

**Performance Standard 1: Meal Counting and Claiming – Critical Area**

*No Findings.*

**Performance Standard 2: Meal Components & Quantities – Critical Area**

3	<p>Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 1/2 cup of the red/orange vegetable subgroup was served during November 3-6, 2025, when 3/4 cup red/orange vegetables are 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 <a href="http://www.azed.gov/hns/nslp">http://www.azed.gov/hns/nslp</a> under the Meal Pattern accordion.</p> <p>The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion in the Menu Planning/ Meal Pattern section.</p>	<p><i>Please provide a written description of the changes that have been made to ensure that weekly red/orange vegetable subgroup quantities at lunch meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.</i></p>
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The Using Appropriate Serving Utensils Recorded Webinar can be found on ADE's website at

<http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion in the Operations section.

The Using Appropriate Serving Utensils Webinar Slides can be found on ADE's website at

<http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion in the Operations section. Please note that repeated violations involving food quantities may result in fiscal action.

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**Performance Standard 2: Dietary Specifications and Nutrient Analysis – Critical Area**

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*No Findings.*

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**Meal Access & Reimbursement: Certification and Benefit Issuance**

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*No Findings.*

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**Meal Access & Reimbursement: Verification**

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*No Findings.*

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**Meal Access & Reimbursement: Meal Counting and Claiming**

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| <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.</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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational accordion. The Step-by-Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion in the Counting &amp; Claiming section.</p> | <p><i>Corrected on-site. Please provide written assurance that the attendance factor reflected on the daily edit check worksheet will be updated annually.</i></p> |
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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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*No Findings.*

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**Meal Pattern & Nutritional Quality: Meal Components and Quantities**

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*No Findings.*

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**Resource Management**

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| <p>5 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, adult breakfast was priced at \$2.50 when it should have been at least \$2.96.</p> | <p>Discussed ways to determine adult meal prices which included a per meal cost analysis and pricing utilizing the Adult Meal Pricing Tool. The paid meal price plus the amount of reimbursement received for a paid meal plus the per meal value of entitlement and bonus commodities for pricing programs. Referred to Adult Meal Pricing Tool located on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms/">https://www.azed.gov/hns/nslp/forms/</a> under the Financial accordion.</p> | <p><i>Adult breakfast price corrected on site using ADE's Adult Meal Pricing Tool. Please provide documentation supporting that \$0.46 of non-Federal funds were used to cover the price of adult breakfasts served during the review period, November 2025.</i></p> |
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| 6 | The balance in the nonprofit school food service account as of June 30, 2024, was not provided to support an exemption from Paid Lunch Equity requirements.   | Discussed that for SY 2025-2026, SFAs with a positive or zero balance in the nonprofit school food service account as of June 30, 2024, are exempt from PLE pricing requirements found at 7 CFR 210.14(e).<br>SFAs must maintain documentation (such as a financial ledger) that supports a positive or zero balance in the nonprofit school food service account as of June 30, 2024.  | <i>Please provide the fund balance of the nonprofit school food service account as of June 30, 2024.</i>  |
| 7 | Supporting documentation for the USDA Nonprogram Food Revenue Tool to demonstrate compliance with revenue from nonprogram food requirements was not provided. | Discussed that assessing compliance with revenue from nonprogram foods requirements ensures that revenues from the sales of nonprogram foods generate at least the same proportion of SFA revenues as they contribute to SFA food costs. Referred to Nonprogram Food Revenue Tool & Calculator located on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms/">https://www.azed.gov/hns/nslp/forms/</a> under the Financial accordion. | <i>Please complete and submit either the USDA Nonprogram Food Revenue Tool or 5-Day Reference Period along with supporting documentation for figures inputted in the tool to demonstrate compliance with revenue from nonprogram food requirements.</i> |

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**General Program Compliance: Civil Rights**

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*No Findings.*

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**General Program Compliance: SFA On-Site Monitoring**

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*No Findings.*

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**General Program Compliance: Local Wellness Policy**

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*No Findings.*

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**General Program Compliance: Competitive Food Services**

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*No Findings.*

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**General Program Compliance: Professional Standards**

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| 8 | The Food Service Management Company 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 <a href="https://theicn.org/icn-resources-a-z/food-safety/">https://theicn.org/icn-resources-a-z/food-safety/</a> .  | <i>Food safety certification was completed on December 15, 2025. No further corrective action is required.</i>   |
| 9 | The Food Service Management Company Director did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.                    | Discussed 12 hour requirement and feasibility for attending upcoming applicable trainings. Training Curriculum for Arizona Child Nutrition Professionals Operating the National School Lunch and School Breakfast Program can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Build Your Employees Training Plans accordion. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion. | <i>Please provide the expected date that the training requirement will be met as well as the name, date and content information of trainings that the Food Service Management Company Director is registered for. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i> |

<p>10 Employees outside of the School Nutrition Program with responsibilities that include duties related to the operation of the School Nutrition Program have not received applicable training nor has sufficient training been planned. Specifically, the AzEds Coordinator and Business Manager have no trainings completed or planned for the current school year.</p>	<p>Discussed 4 hour training requirement, employee's job duties, and applicable trainings that could be provided and feasible timeline. Training Curriculum for Arizona Child Nutrition Professionals Operating the National School Lunch and School Breakfast Program can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Build Your Employees Training Plans accordion. The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion.</p>	<p><i>Please provide the expected date that the training requirement will be met as well as the name, date and content information of trainings that employees outside of the School Nutrition Program with responsibilities related to the operation of the School Nutrition Programs will receive.</i></p>
<p>11 AzEds Coordinator and Business Manager tasked with National School Lunch Program Procurement responsibilities have not completed annual training on Federal procurement standards for the current school year.</p>	<p>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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Build Your Employees Training Plans accordion. Procurement Basics training can be found on ADE's website at <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion.</p>	<p><i>Please provide the certificate of completion of Procurement Basics (or an equivalent training on Federal procurement standards) for the AzEds Coordinator and Business Manager 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></p>

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**General Program Compliance: Water**

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*No Findings.*

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**General Program Compliance: Food Safety, Storage and Buy American**

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<p>12 The following products observed at Coronado 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: La Victoria Salsa (product of Mexico) and Jack Pot Tropical Fruit Cocktail (product of Thailand).</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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> 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**

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*No Findings.*

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

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*No Findings.*

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**Other Federal Program Reviews: Afterschool Snack Program**

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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! Palominas Elementary School District 49 has successfully completed the administrative review for the 2025-2026 School Year! It is recommended to ensure training trackers are updated annually. Thank you so much for your cooperation and responsiveness during the review process. It is apparent that you care for your students and take great pride in providing nutritious meals. Well done!

**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 April 24, 2026, to Megan Hoovler at [Megan.Hoovler@azed.gov](mailto:Megan.Hoovler@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.

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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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