



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Littleton Elementary District
CTD: 07-04-65
Sites: Collier Elementary School and Littleton Elementary School

Contacts: Louis Laffitte Jr., Superintendent and Rochelle Corry, Finance Director

Review Dates: February 12-13, 2026

Exit Conference Date: February 13, 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
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 5 lunches counted for reimbursement did not contain all of the required meal components at Littleton Elementary School. 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. 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.	<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>
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Performance Standard 2: Dietary Specifications and Nutrient Analysis – Critical Area

No findings.

Meal Access & Reimbursement: Certification and Benefit Issuance

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| 2 | An individual separate from the application approval process has not been designated as the hearing official. | Discussed that the hearing official must be an individual who was not involved in determining the eligibility under appeal. Additionally discussed appropriate school officials who could be designated. Referred to Hearing Procedure section in USDA's Eligibility Manual for School Meals found on ADE's website at https://www.azed.gov/hns/nslp under the Guidance Manuals accordion in the USDA Manuals and Handbooks section. | <i>Please provide the name and title of the individual designated as the hearing official. Additionally, please provide documentation to demonstrate where households are notified of the hearing official.</i> |
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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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| 3 | Indirect costs were incorrectly calculated. Specifically, the correct indirect cost rate was applied to an incorrect direct cost base. Based on expenditures from School Year 2024-2025, the direct cost base was \$471,044.62 allowing \$84,788.03 of indirect costs to be charged to the nonprofit school food service account. However, the SFA did not subtract subawards in excess of \$50,000 from their calculation resulting in a direct cost base of \$2,890,066.62. and \$500,000.00 in indirect costs charged to the nonprofit school food service account, which exceeds the allowable amount by \$415,211.79. | 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. Additionally, please provide supporting documentation which reflects that \$415,211.79 of indirect costs charged in excess of the allowable rate have been returned to the nonprofit school food service account.</i> |
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General Program Compliance: Civil Rights

No findings.

General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

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| 4 | The Local Wellness Policy did not contain all required elements. Specifically, the Local Wellness Policy did not contain policies for food and 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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General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

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| 5 | 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> |
| 6 | The School Nutrition Program 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 https://www.azed.gov/hns/nslp/training 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 https://www.azed.gov/hns/nslp/training 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 School Nutrition Program 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> |

7 The School Nutrition Programs staff tasked with National School Lunch Program procurement responsibilities 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 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>
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General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

No findings.

General Program Compliance: Reporting and Recordkeeping

8 Reports are not submitted to the State agency as required. Specifically, the submitted site application in CNPWeb indicated that Littleton Elementary School is OVS at breakfast when the site is Serve Only at breakfast.	Discussed steps required to update the site application in CNPWeb to reflect current practice of Serve Only at breakfast, including notifying the assigned specialist approving applications of the update.	<i>Please resubmit a site application for Littleton Elementary School in CNPWeb indicating the current practice of Serve Only at breakfast. Additionally, please provide written assurance that the site application in CNPWeb will be updated to accurately reflect current practices whenever site operations change.</i>
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General Program Compliance: School Breakfast Program and Summer Food Service Program Outreach

No findings.

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

No findings.

Other Federal Program Reviews: At-Risk Afterschool Meals

No findings.

Comments/Recommendations:

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

Point of Service (POS) Procedures

Update POS procedures to support staff in accurately identifying reimbursable meals under Offer vs. Serve (OVS). Reinforce the requirement that students must select a minimum of three components, and one of those must be at least ½ cup of fruit or vegetable. Meals missing these required components cannot be claimed for reimbursement.

Visual Aids & Tools

Post component charts at each serving line to help staff and students identify required meal components quickly and consistently.

“Stop and Correct” Process

Implement a structured “stop and correct” procedure to ensure incomplete meals are corrected before students leave the serving area and before meals are counted at POS.

These enhancements will support stronger internal controls, promote accurate meal claiming, and help ensure students 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	\$0.00	Not Applicable
National School Lunch Program	\$15.23	Disregarded

