



# ARIZONA DEPARTMENT OF EDUCATION

## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Vernon Elementary District

CTD: 01-03-09

Site: Vernon Elementary School

Contacts: Shad Housley, Administrator and Karol Coffman, Director

Review Date: March 18, 2026

Exit Conference Date: March 18, 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

1	Daily meal count sheets were not correctly consolidated at breakfast and lunch during the review period. This was deemed a non-systemic error and did not contribute 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 daily 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

2	Food quantities observed at breakfast on the day of review did not meet minimum amounts required by the meal pattern. Specifically, 1/2 cup of fruit was served at breakfast when 1 cup of fruit is required daily at breakfast for grades K-8. This was not a repeat finding from the previous cycle and therefore did not contribute 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 (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Breakfast 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.  The Step-by-Step Instruction: How to Plan a Breakfast 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.	<i>Please provide a written description of the changes that have been made to ensure that daily fruit quantities at breakfast meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Breakfast Menu must be submitted.</i>
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The Using Appropriate Serving Utensils Webinar and 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.

- 3 Food quantities served at breakfast during the review period did not meet minimum amounts required by the meal pattern. Specifically, 1/2 cup of fruit was served on February 2-4, 2026 when 1 cup is required daily at breakfast for grades K-8. This was deemed a systemic issue and additionally occurred on February 11, 12, 17, 18, 23, 24, 25, and 26, 2026. This was not a repeat finding from the previous cycle and therefore did not contribute 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 (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Breakfast Program can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern accordion.

*Please provide a written description of the changes that have been made to ensure that daily fruit quantities at breakfast meet minimum amounts required by the meal pattern.*

The Step-by-Step Instruction: How to Plan a Breakfast 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.

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.

- 4 Food quantities served at breakfast during the review period did not meet minimum amounts required by the meal pattern. Specifically, 2-1/2 cups of fruit was served February 2-5, 2026 when 4 cups is required weekly at breakfast for grades K-8. This was deemed a systemic issue and additionally occurred during every week throughout February 2026. This was not a repeat finding from the previous cycle and therefore did not contribute 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 (e.g., changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Breakfast Program can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern accordion.

*Please provide a written description of the changes that have been made to ensure that weekly fruit quantities at breakfast meet minimum amounts required by the meal pattern.*

The Step-by-Step Instruction: How to Plan a Breakfast 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.

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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| <p>5 During the week of review, at least 80% of grains served at breakfast and lunch were not whole grain-rich. Specifically, only 71.43% of grains served at breakfast and 76.47% of grains served at lunch during February 2-5, 2026 were whole grain-rich.</p>  | <p>Discussed requirement for at least 80% of grains served to be whole grain-rich, how to identify whole grain-rich items, and potential changes to the menu to increase whole grain-rich percentage. USDA's Whole Grain Resource for the National School Lunch and Breakfast Programs: A Guide to Meeting the Whole Grain-Rich Criteria 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 Menu Planning accordion.</p> | <p><i>Please provide one week of breakfast and lunch production records and supporting documentation (e.g., Child Nutrition label, Product Formulation Statement, ingredient lists, Nutrition Facts labels, etc.) that demonstrate at least 80% of grains served at breakfast lunch were whole grain-rich.</i></p> |
| <p>6 Breakfast cereals provided to students during the review period exceeded the allowable added sugar limits. Specifically, the Honey Nut Cheerios served on February 5, 2026 contained 9 grams of added sugar per dry ounce when no more than 6 grams of added sugars per dry ounce is allowable.</p> | <p>Discussed that beginning July 1, 2025, breakfast cereals may have no more than 6 grams of added sugars per dry ounce. Referred to USDA's Added Sugars webpage at <a href="https://www.fns.usda.gov/cn/school-nutrition-standards-updates/added-sugars">https://www.fns.usda.gov/cn/school-nutrition-standards-updates/added-sugars</a>.</p>   | <p><i>Please provide the Nutrition Facts label for the product that will replace Honey Nut Cheerios. Additionally, please provide written assurance that all breakfast cereals provided to students will contain no more than 6 grams of added sugars per dry ounce.</i></p>                                       |

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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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*No Findings.*

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**Meal Pattern & Nutritional Quality: Offer Versus Serve**

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| 7 | Offer versus Serve (OVS) was not implemented properly. Specifically, meals were pre-plated preventing students from refusing components and students were required to take milk at breakfast. | Provided technical assistance on proper implementation of OVS and discussed with kitchen and point of service staff. Reviewed menu and discussed options for a reimbursable meal under OVS. USDA's Offer Versus Serve Manual can be 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.   | <i>Please provide a written description demonstrating how OVS will be implemented properly. Additionally, please provide written assurance that moving forward, OVS will be implemented properly. If no longer implementing OVS, please provide a written description of changes that have been made to meal service to ensure only reimbursable meals are served.</i> |
| 8 | Cafeteria staff have not been properly trained on Offer versus Serve (OVS) meal service.  | Discussed that schools are expected to conduct training for point of service and serving line staff so they can help students select the required food components/food items in the quantities needed for reimbursable lunches and breakfasts. Additionally discussed that this could be included in the annual training requirements for program staff. Referred to USDA's Offer Versus Serve Manual located 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. | <i>Please provide a written description of how cafeteria staff will be trained on OVS. Additionally, the certificate of completion of Meal or No Meal and Meal or No Meal - Breakfast Edition must be submitted.</i>   |

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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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| 9  | 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, \$3.15 was charged for adult breakfast when a minimum of \$3.245 should be charged and \$4.95 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 <a href="https://www.azed.gov/hns/nslp/forms/">https://www.azed.gov/hns/nslp/forms/</a> 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 supporting that \$0.26 of non-Federal funds were used to cover the price of serving adult meals served during the review period.</i>   |
| 10 | A system or process to sufficiently separate nonprogram food revenue and costs from program food revenue and costs has not been implemented. Specifically, the SFA did not have a processes in place for tracking revenues and costs of individual items provided to students a la carte or assessing compliance with nonprogram food revenue.  | Discussed feasible methods for separating revenues and costs from program foods from revenues and costs from nonprogram foods. Discussed revenue from nonprogram foods requirements and provided with Nonprogram Food Revenue Tool. Referred to USDA Memo SP 39-2011: Guidance on Paid Lunch Equity and Revenue from Nonprogram Foods.  | <i>Please provide a description of the systems that will be developed to separate nonprogram food revenue from program food revenue. If no longer providing nonprogram foods to students, please provide a written description of changes that have been made to meal services to ensure only program foods (reimbursable meals) are provided.</i> |

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**General Program Compliance: Civil Rights**

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| 11 | The USDA nondiscrimination statement used on program materials is not the most current USDA statement. Specifically, the media release, program outreach letter, and announcement email did not contain the most current USDA nondiscrimination statement. | Discussed where to find nondiscrimination statement on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> and whether long or short statement would be most appropriate. | <i>Please provide an updated media release and program outreach letter with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i> |
| 12 | The USDA nondiscrimination statement not printed on appropriate program materials. Specifically, the notification letter and menus did not include the USDA nondiscrimination statement.   | Discussed where to find nondiscrimination statement on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> and whether long or short statement would be most appropriate. | <i>Please provide an updated notification letter with the nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated to include the appropriate nondiscrimination statement.</i> |

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

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*Not Applicable.*

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**General Program Compliance: Local Wellness Policy**

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| 13 | 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Local Wellness Policy accordion. Local Wellness Policy Assessment: Making it Meaningful Webinar 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 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> |
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**General Program Compliance: Competitive Food Services**

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*Not Applicable.*

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**General Program Compliance: Professional Standards**

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<p>14 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, teachers conducting meal counts and accounts payable assisting with program operations and documentation have not completed nor documented plans to complete at least four hours of job-specific training.</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. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</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>15 The following products observed at Vernon 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: Cucumbers and Oranges from Mexico and Grapes from Chile.</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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<p>16 Production record crediting is inaccurate. Specifically, the following items did not reflect correct crediting information: String Cheese, Egg, Biscuit, Boiled Egg, Chicken Alfredo, Sloppy Joe's, Cheese Slice, and Sandwich Bread.</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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> 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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17 Breakfast and Lunch production records provided do not list the two different milk varieties that were served.	Discussed the importance of documenting specific varieties and providing detailed descriptions for all menu items. Production Record Templates 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 Menu Planning accordion. The Production Record Overview Recorded Webinar & Webinar Slides 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 copies of completed breakfast and lunch production records for 5 consecutive days that lists two different milk varieties. Additionally, the certificate of completion of Production Record Overview must be provided.</i>
18 A standardized recipe sheet was not provided for the salad bar served February 3, 2026. Without sufficient documentation, the reviewer was unable to determine how it credited toward meal pattern components.	Discussed all menu items that contain more than one ingredient must have a standardized recipe. Standardized recipes must include the following information: recipe name, recipe number, ingredients and amounts, serving size, recipe yield, preparation instructions, HACCP process, and HACCP instructions. Standardized Recipe Template 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 Menu Planning accordion.	<i>Please provide an standardized recipe for the Salad Bar. Additionally, please provide written assurance that recipe sheets will be maintained for all menu items that contain more than one ingredient.</i>

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

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19 Households were not notified of the availability of the Summer Food Service Program (SFSP) prior to the end of the school year.	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 <a href="https://www.azhealthzone.org/">https://www.azhealthzone.org/</a> .	<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>
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**Other Federal Program Reviews: Afterschool Snack Program**

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*Not Applicable.*

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**Other Federal Program Reviews: Seamless Summer Option**

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Will be reviewed in Summer 2026 if applicable.

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**Other Federal Program Reviews: Fresh Fruit and Vegetable Program**

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20 The SFA did not complete the mandatory yearly Fresh Fruit and Vegetable Program (FFVP) training prior to beginning operations.	Discussed the requirement to participate in State agency training before beginning operations each new school year. Referred to Orientation to the Fresh Fruit and Vegetable Program that 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 Fresh Fruit and Vegetable Program accordion.	<i>Orientation to the Fresh Fruit and Vegetable Program (FFVP) training was completed in February 2026. Please provide written assurance that this training will be completed prior to beginning operations every year the SFA is participating in the FFVP.</i>
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**Other Federal Program Reviews: Special Milk Program**

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*Not Applicable.*

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**Other Federal Program Reviews: At-Risk Afterschool Meals**

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*Not Applicable.*

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**Comments/Recommendations:**

Congratulations, Vernon Elementary District has successfully completed the administrative review for the 2025-2026 school year. It is recommended that trainings in Meal Components and Quantities 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>.**

<b>Fiscal Action</b>		
<b>Program</b>	<b>Total Fiscal Action</b>	<b>Assessed or Disregarded</b>
School Breakfast Program	\$0.00	Not Applicable
National School Lunch Program	\$0.00	Not Applicable

Please submit corrective action response by May 25, 2026 to Jackie Rodriguez at [Jackie.Rodriguez@azed.gov](mailto: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.**

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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  
1535 West Jefferson Street • Phoenix Arizona 85007 • [www.azed.gov](http://www.azed.gov)  
"We are a service organization committed to raising academic outcomes and empowering parents."

USDA is an equal opportunity provider, employer, and lender.