



ARIZONA DEPARTMENT OF EDUCATION

Health and Nutrition Services Division

Administrative Review Summary Report

School Food Authority Name: Union Elementary District

CTD: 07-04-62

Site: Dos Rios Elementary

Contacts: Kristine Morris, Administrator and Kala Suchan, Food Service Director

Review Date: October 23, 2025

Exit Conference Date: October 23, 2025

Review Period: September 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

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 7 breakfasts counted for reimbursement did not contain all of the required meal components. This 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. 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 & 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 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. Additionally, the certificate of completion of Recognizing a Reimbursable Breakfast 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

No findings.

Meal Access & Reimbursement: Verification

No findings.

Meal Access & Reimbursement: Meal Counting and Claiming

No findings.

Meal Pattern & Nutritional Quality: Offer Versus Serve

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| 2 Offer versus Serve (OVS) was not implemented properly. Specifically, point of service staff did not ensure a reimbursable breakfast was selected during Breakfast in the Classroom service. | 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 https://www.azed.gov/hns/nslp under the Guidance Manuals accordion. | <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.</i> |
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Meal Pattern & Nutritional Quality: Meal Components and Quantities

No findings.

Resource Management

No findings.

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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| 3 The Local Wellness Policy did not contain all required elements. Specifically, the Local Wellness Policy did not contain a description of public involvement, public updates and policy leadership. | 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 a description of public involvement, public updates, policy leadership, and evaluation plan 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> |
| 4 The review and update of the Local Wellness Policy, as specified in the policy itself, is not occurring nor is documentation being kept on file to support this. | Discussed why the review and update is not occurring and what can be done to ensure this occurs as specified in the Local Wellness Policy. Discussed maintaining records to document compliance. 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 description of how the Local Wellness Policy will be reviewed and updated as well as how reviews and updates will be documented.</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

No findings.

General Program Compliance: Reporting and Recordkeeping

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| 5 Production record crediting is inaccurate. Specifically, the following items did not reflect correct crediting information: Cheeseburger and hamburger served on September 8, 2025; Tortilla chips, beans and carrot sticks served on September 10, 2025; and lunch meat and cheese, tater tots and carrots sticks served on September 11, 2025. | 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. | 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. |
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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

Not applicable

Other Federal Program Reviews: At-Risk Afterschool Meals

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| <p>6 Yogurt provided to students during the review period exceeded the allowable added sugar limits. Specifically, Yoplait Original Raspberry Peach yogurt served at At-Risk afterschool supper on September 9, 2025, contained 13 grams of added sugar per ounce when no more than 2 grams of added sugars per ounce is allowable. This contributed towards fiscal action calculations.</p> | <p>Discussed that beginning July 1, 2025, yogurt may have no more than 2 grams of added sugars per ounce. Referred to USDA's Added Sugars webpage at https://www.fns.usda.gov/cn/school-nutrition-standards-updates/added-sugars.</p> | <p><i>Please provide the Nutrition Facts label for the product that will replace Yoplait Original Raspberry and Peach yogurt. Additionally, please provide written assurance that all yogurt provided to students will contain no more than 2 grams of added sugars per ounce.</i></p> |
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Comments/Recommendations:

Thank you for your participation in the National School Lunch Program (NSLP), School Breakfast Program (SBP), and At-Risk Afterschool Supper Program. The State agency commends your commitment to operating these programs and serving your students with care and dedication.

Your attention to detail and responsiveness throughout the administrative review process is greatly appreciated.

To further strengthen program operations, it is recommended that teaching staff involved in the SBP receive additional training on identifying reimbursable meals. Additionally, please consider developing a plan to ensure compliance when substitute teachers are responsible for meal distribution in the classroom.

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	\$18.04	Disregarded
National School Lunch Program	\$188.60	Disregarded

Please submit corrective action response by January 7, 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
1535 West Jefferson Street • Phoenix Arizona 85007 • www.azed.gov
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This institution is an equal opportunity provider.