



# ARIZONA DEPARTMENT OF EDUCATION

## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Pima County Juvenile Court Center  
CTD: 10-10-01  
Site: Pima County Juvenile Court

Contacts: Suzette Williams, Director of Detention Services & George Hogan, Support Services Manager

Review Date: October 28, 2025

Exit Conference Date: October 28, 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
<b>Performance Standard 1: Certification and Benefit Issuance – Critical Area</b>			

*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 systemic error and contributed towards fiscal action calculations. A full recalculation of breakfasts and lunches served for the months of July 2025- November 2025 will be conducted at Pima County Juvenile Court.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue.	Appropriate changes to the procedures of meal counting and claiming have been made and a recalculation was conducted.
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### Performance Standard 2: Meal Components & Quantities – Critical Area

2	Yogurt provided to students on the day of review exceeded the allowable added sugar limits. Specifically, Yoplait Harvest Peach yogurt served on the day of review at breakfast contained 2.75 grams of added sugar per ounce when no more than 2 grams of added sugars per ounce is allowable.	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 <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> .	Please provide the Nutrition Facts label for the product that will replace Yoplait Harvest 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.
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- 3 During the week of review, at least 80% of grains served at lunch were not whole grain-rich. Specifically, only 77.27% of grains served at lunch during September 8-14, 2025 were whole grain-rich, due to enriched elbow pasta served on September 10, 2025 and enriched tortilla served on September 13, 2025.
- 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 <https://www.azed.gov/hns/nslp/forms> under the Menu Planning accordion.
- Please provide one week of 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 lunch were whole grain-rich.*
- 4 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 5/8 cup vegetable was served on September 9, 2025, and 7/8 cup vegetable was served on September 14, 2025, when 1 cup is required daily at lunch for grades 9-12. 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 Lunch Program can be found on ADE's website at <http://www.azed.gov/hns/nslp> under the Meal Pattern accordion. The Step-by-Step Instruction: How to Plan a Lunch 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.
- Please provide a written description of the changes that have been made to ensure that daily vegetable quantities at lunch meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.*
- 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.
- 5 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 1.5 oz eq Meat/ Meat Alternate was served on September 9, 2025 when 2 oz eq is required daily at lunch for grades 9-12. 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 Lunch 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 Meat/ Meat Alternate quantities at lunch meet minimum amounts required by the meal pattern.*

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| <p>6 Food quantities served at lunch during the review period did not meet minimum amounts required by the meal pattern. Specifically, 1.0 oz eq of Grain was served on September 10, 2025, and 1.75 oz eq of Grain was served on September 13, 2025, when 2 oz eq is required daily at lunch for grades 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><i>Please provide a written description of the changes that have been made to ensure that daily Grain quantities at lunch meet minimum amounts required by the meal pattern.</i></p>   |
| <p>7 Yogurt provided to students during the review period exceeded the allowable added sugar limits. Specifically, Yoplait Harvest Peach yogurt served on September 10 and 11, 2025 during the week of review at breakfast contained 2.75 grams of added sugar per ounce when no more than 2 grams of added sugars per ounce is allowable.</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 <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 Yoplait Harvest 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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**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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*No findings.*

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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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| <p>8 Signage which explains what constitutes a reimbursable meal was not displayed to students at Breakfast and Lunch.</p> | <p>Discussed feasible options for signage and potential content as well as the plan for creating and posting near the point of service. Printable reimbursable meal signage 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 the sign that will be displayed to students that demonstrates what constitutes a reimbursable meal at breakfast and lunch. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i></p> |
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**Resource Management**

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No findings.

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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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Not applicable

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**General Program Compliance: Local Wellness Policy**

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| 9 | 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, how the wellness policy compares to model wellness policies, 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, how the wellness policy compares to model wellness policies, 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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No findings.

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**General Program Compliance: Professional Standards**

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| 10 | Full-time School Nutrition Program staff have not met the training requirements for the current school year (July 1, 2025 - June 30, 2026), and sufficient plans for meeting the requirements have not been developed to complete the annual training requirements. | Discussed 6 hour training 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 full-time School Nutrition Program staff are 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> |
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<p>11 The School Nutrition Programs director, management, and/or staff tasked with National School Lunch Program procurement responsibilities have not completed annual training on Federal procurement standards.</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 School Nutrition Programs director, management, and/or 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></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 Pima County Juvenile Court 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: Canned Pineapple Chunks from Thailand and Canned Tropical Fruit from the Philippines.</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>13 Production record crediting is inaccurate. Specifically, the following items did not reflect correct crediting information: Sausage, English Muffin, served at breakfast during the week of review. Additionally at lunch during the week of review the bread used in grilled cheese, chicken in chicken noodle soup, sub roll, turkey used in sub, potato salad, ground beef and pasta in chili mac and cheese, chicken tenders, hot dog, hot dog bun, taco filling, and tortillas crediting information was incorrect on the production record.</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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**General Program Compliance: School Breakfast Program and Summer Food Service Program Outreach**

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<p>14 Sufficient outreach to families regarding the availability of the School Breakfast Program (SBP) was not conducted at the beginning of the school year. Specifically, youth handbook did not explicitly describe the availability of School Breakfast program.</p>	<p>Discussed methods of notifying families of the availability of the School Breakfast Program (SBP) at the start of the school year. Additionally, discussed SBP outreach should include: serving times, locations where breakfast is available, and SBP costs.</p>	<p><i>Please provide the updated documentation that will be used when notifying families of the availability of the School Breakfast Program (SBP). Additionally, please provide written assurance that families will be notified of the availability of the SBP at the beginning of each school year.</i></p>
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**Other Federal Program Reviews: Afterschool Snack Program**

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<p>15 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>
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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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*Not applicable*

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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:

Thank you, Pima County Juvenile Justice Center, for your participation in the School Breakfast Program (SBP), National School Lunch Program (NSLP), and Afterschool Snack Program (ASP). The State agency commends your commitment to youth in care and recognizes your use of scratch cooking and a four-week menu cycle, which provides variety and enhances meal quality. During the review, several opportunities for improvement were identified. The State agency recommends simplifying meal counting procedures/consolidation to reduce errors and enhance accuracy. Additionally, training on meal pattern crediting and recipe development is encourage to support compliance in future program years.

**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	\$2,369.64	Assessed
National School Lunch Program	\$14,827.44	Assessed

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Reviewer Signature                      Date

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Program Director 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)  
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This institution is an equal opportunity provider.