



**Arizona Department of Education  
Health and Nutrition Services Division**

**Administrative Review Summary Report**

School Food Authority Name: Seba Dalkai Boarding School

CTD: 09-40-13

Site(s): Seba Dalkai School

Contacts: Maye Bigboy, Principal / Orlinda Cly, Cook

Review Date: May 10, 2022

Review Period: April 2022

Programs Reviewed:

National School Lunch  
 Fresh Fruit & Vegetable

School Breakfast  
 Special Milk

Afterschool Snack  
 At-Risk Afterschool Meals

| No. | Review Observations & Findings | Technical Assistance Provided | Required Corrective Action |
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**Performance Standard 1: Certification & Benefit Issuance - Critical Area**

Not Applicable

**Performance Standard 1: Meal Counting & Claiming - Critical Area**

No Findings

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

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| 1 During the week of review, all grains served at lunch were not whole grain rich. Specifically, a dinner roll was served on 4/7/22 that was not whole grain rich. | Discussed whole grain-rich requirements. 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 tab. | <i>Please provide written assurance that moving forward all grains served will be whole grain-rich.</i> |
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**Performance Standard 2: Dietary Specifications & Nutrient Analysis - Critical Area**

No Findings

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

Not Applicable

**Meal Access & Reimbursement: Verification**

Not Applicable

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

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| 2 | Daily edit checks are not being conducted appropriately. Specifically, the attendance factor was not used to attain an attendance-adjusted enrollment.   | 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational tab. 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 tab. | <i>Please provide a completed daily edit check worksheet for the month of May. Additionally, please provide written assurance that daily edit checks will be conducted. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete Daily Edit Checks must be submitted.</i> |
| 3 | The site application in CNPWeb does not accurately reflect the on-site operations. Specifically, the NSLP site application for Seba Dalkai School indicates participation in At-Risk snack, however, this program is not being operated. | Advised SFA to update site application in CNPWeb and contact their assigned specialist to let them know of the changes.   | <i>Please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i>   |

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

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Not Applicable

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

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| 4 | Signage which explains what constitutes a reimbursable meal was not displayed to students at breakfast and lunch. | Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS 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 tab. | <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> |
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**Resource Management**

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| 5 | The Financial Management System utilized was insufficient to accurately identify and track all revenues and expenditures of the nonprofit school food service program. Specifically, the reviewer was not able to determine compliance with Maintenance of the Nonprofit School Food Service Account due to not receiving sufficient documentation.  | Discussed feasibility for designating a separate financial account for the nonprofit school food service, as well as the requirement to differentiate revenues and expenditures of the nonprofit school food service program if a separate account cannot be designated. Discussed the importance of establishing a financial management system and internal controls needed to accurately track all revenues and expenditures of the nonprofit school food service program. | <i>Please provide a written description of steps that will be taken to ensure all revenues and expenditures of the nonprofit school food service account are easily identifiable as required in 7 CFR 210.14. Additionally, please provide the following documentation:<br/>- Year-end statement of Revenue and Expenses for the Nonprofit School Food Service Account (detailed General Ledger or comparable documentation) for the most recently completed school year<br/>- Supporting documentation for the selected sample of expenses<br/>- Description of how the deficit of the Nonprofit Food Service Account was resolved at the end of SY20-21</i> |
| 6 | 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 at lunch (breakfast price was sufficient). | Discussed ways to determine adult meal prices which included a per meal cost analysis or 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 HNS 27-2021 Guidance for Adult Meal Pricing in School Year 2021-2022 (SY 22).  | <i>Please provide a written description of the steps which have been taken to increase adult meal prices and resolve the discrepancy, including the exact formula used to price adult meals. Additionally, please submit supporting documentation which reflects that prices have been increased to the appropriate level.</i>  |

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**General Program Compliance: Civil Rights**

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| 7 | The public/media release was not provided to local media, the unemployment office and local employers considering large layoffs.  | Discussed schools operating SSO must provide public notification regarding the availability of school meals and the eligibility criteria at or near the beginning of the school year. For SY 2021-2022, schools participating in SSO should notify households that meals will be offered free through SSO. Referred to HNS 17-2021 & SP 15-2021 (Q10). Additionally, referred to the template release that 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 Outreach tab.  | <i>Please provide written procedures for distributing the public/media release and written assurance that the public/media release will be submitted to the local media, the unemployment office and local employers considering large layoffs prior to the start of each school year.</i>  |
| 8 | Sufficient documentation to support accommodations for special diets has not been maintained. Specifically, there is no form made available to accommodate students with dietary needs that diverge from meal pattern requirements. | Discussed requirements for accommodating special diets and the need for sufficient documentation. Referred to Medical Statement for Students with Special Dietary Accommodations 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 tab. Additionally, referred to Accommodating Children with Disabilities in the School Meal Program 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 tab. Step-by-Step Instruction: How to Complete the Medical Statement for Students with Special Dietary Accommodations 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 tab. | <i>Please provide written procedures for maintaining documentation supporting accommodations for special diets and written assurance that sufficient documentation to support accommodations for special diets will be maintained. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete the Medical Statement for Students with Special Dietary Accommodations must be submitted.</i> |
| 9 | The Civil Rights Compliance form was not completed correctly. Specifically, the ethnicity chart was not completed.  | Discussed requirement for completing form and how to collect racial/ethnic data from program participants. The form can be found on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> . The Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form 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 tab.  | <i>Please provide written assurance that the Civil Rights Compliance form will be completed by December 15 each year and kept on file for 5 years. Additionally, please indicate who will be responsible for completing this form. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form must be submitted.</i>                                       |

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

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| 10 | On-site reviews of the lunch meal counting and claiming procedures for all sites within the SFA are not being conducted each year prior to February 1.            | Discussed requirement and where to find a template Internal On-Site Monitoring Form-Lunch of the Meal Counting and Claiming System 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 tab. Discussed who would be responsible for completing this each year.     | <i>Please provide a completed Internal On-Site Monitoring Form of the Meal Counting and Claiming System. Additionally, please provide a written description of the process that has been put in place to ensure that all sites receive an on-site review of the meal counting and claiming procedures each year prior to February 1.</i>                                 |
| 11 | On-site reviews of the breakfast meal counting and claiming procedures for 50% of the sites within the SFA are not being conducted each year prior to February 1. | Discussed requirement and where to find a template Internal On-Site Monitoring Form-Breakfast of the Meal Counting and Claiming System 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 tab. Discussed who would be responsible for completing this each year. | <i>Please provide a completed Internal On-Site Monitoring Form of the Meal Counting and Claiming System. Additionally, please provide a written description of the process that has been put in place to ensure that 50% of the sites operating breakfast will receive an on-site review of the meal counting and claiming procedures each year prior to February 1.</i> |

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**General Program Compliance: Local Wellness Policy**

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| 12 The nutrition guidelines for all foods and beverages sold to students on the school campus during the school day are not consistent with the Federal regulations for school meal nutrition standards/Smart Snacks in school nutrition standards. | Discussed developing a LWP with nutrition guidelines for all foods and beverages sold to students that meet Federal regulations. The Local Wellness Policy Final Rule: Guidance and Tools From ADE 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 Tab.   | <i>Please provide a written description of the changes that will be made to the LWP to meet the requirements for nutrition guidelines for all food and beverages sold to students. The description should include draft language, who will be involved in updating the LWP and the date the update is expected to be completed.</i> |
| 13 The Local Wellness Policy (LWP) did not contain goals for nutrition promotion.   | Discussed feasible options for nutrition promotion goals that can be written into the LWP. Discussed activity ideas which included offering contests, surveys, promotions and/or taste testing, providing information to families to encourage consumption of healthy foods at home, and displaying nutrition and health posters throughout campus. Team Nutrition Resources can be found at <a href="http://www.teamnutrition.usda.gov/">http://www.teamnutrition.usda.gov/</a> . The Local Wellness Policy Final Rule: Guidance and Tools From ADE 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 Tab. | <i>None required at this time.</i>  |
| 14 The Local Wellness Policy (LWP) did not contain policies for food and beverage marketing.  | Discussed updating the LWP 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training Tab.   | <i>None required at this time.</i>  |
| 15 The public is not being notified of the existence and contents of the Local Wellness Policy (LWP).   | Discussed feasible means of notifying the public about the LWP. The Local Wellness Policy Final Rule: Guidance and Tools From ADE 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 Tab.  | <i>None required at this time.</i>  |
| 16 The Local Wellness Policy (LWP) does not specify how and when a review and update of the policy is to occur.   | Discussed the best setting and timeframe for the periodic review and update of the LWP as well as how this can be included in the LWP. The Local Wellness Policy Final Rule: Guidance and Tools From ADE 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 Tab.   | <i>None required at this time.</i>  |

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| 17 The required stakeholders are not being permitted to be involved in the review and update of the Local Wellness Policy (LWP).   | Discussed LEAs must permit participation by the general public and school community (including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators) in the wellness policy process. Guidance on assembling a Local Wellness Policy Team can be found on Team Nutrition's website at <a href="https://www.theicn.org/cnss/community-connection/assembling-the-team/">https://www.theicn.org/cnss/community-connection/assembling-the-team/</a> . The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at <a href="https://www.azed.gov/hns/nsfp/training">https://www.azed.gov/hns/nsfp/training</a> under the Online Training Tab. | <i>None required at this time.</i>   |
| 18 Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the Local Wellness Policy (LWP).   | Discussed feasible means of notifying potential stakeholders of their ability to participate. The Local Wellness Policy Final Rule: Guidance and Tools From ADE Webinar can be found on ADE's website at <a href="https://www.azed.gov/hns/nsfp/training">https://www.azed.gov/hns/nsfp/training</a> under the Online Training Tab.   | <i>None required at this time.</i>   |
| <b>General Program Compliance: Competitive Food Services</b>   |   |  |
| No findings  |   |  |
| <b>General Program Compliance: Professional Standards</b>  |   |  |
| No Findings  |   |  |
| <b>General Program Compliance: Water</b>   |   |  |
| No Findings  |   |  |
| <b>General Program Compliance: Food Safety, Storage and Buy American</b>   |   |  |
| 19 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools or at off-site storage facilities: Fruit cocktail (Malaysia, Chile). Additionally, documentation justifying a Buy American exception was not maintained/on file. | Discussed the Buy American provision requirements and procedures to ensure compliance. Referred to SP38-2017, Buy American Webinar and FAQ. Funds used from the non-profit food service account must be used to procure food products that comply with the Buy American Provision. Additional information on the requirements of this provision, including ADE's prototype Buy American exception document, can be found on ADE's website at <a href="https://www.azed.gov/hns/nsfp/forms">https://www.azed.gov/hns/nsfp/forms</a> under the Operational tab. Buy American Recorded Webinar and FAQ can be found on ADE's website at <a href="https://www.azed.gov/hns/nsfp/training">https://www.azed.gov/hns/nsfp/training</a> under the Online Training Library tab.   | <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> |

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**General Program Compliance: Reporting & Recordkeeping**

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| 20 | Production records for breakfast and lunch provided did not contain all required sections: Specifically, production records used/left over section is not completed adequately.  | Discussed required sections of production records. 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 tab. 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 tab. | <i>Please provide written assurance that all required sections of production records will be completed and that all records will be maintained for 5 years. Additionally, the certificate of completion of Production Record Overview must be provided.</i> |
| 21 | Production record crediting and recipe crediting are inconsistent. Specifically, crediting information on the recipe for baked chicken is not accurate and does not match the crediting information reported on the production record. | Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. 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 tab.  | <i>Please provide updated recipes and production records with consistent crediting for the baked drumstick.</i>   |
| 22 | Production record crediting information was not accurate for the following menu items: cornbread, chef salad, and nacho supreme. Crediting information was not reported on the recipes for these items.                                | Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. 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 tab.  | <i>Please provide updated recipes and production records with consistent crediting for the cornbread, chef salad, and nacho supreme.</i>  |

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

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| 23 | Outreach to families regarding the availability of the School Breakfast Program (SBP) was not conducted during the school year. | Discussed methods of notifying families of the availability of the SBP at the start of and throughout the school year. Additionally, discussed SBP reminders must include: serving times, locations where breakfast is available, and SBP costs. | <i>Please provide documentation that demonstrates how households are notified of the availability of the SBP during the school year. Additionally, please provide a written description of how households will be notified of the availability of the SBP at the beginning of and during the school year, and written assurance that this will occur.</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 2022 if applicable.

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**Other Federal Program Reviews: Fresh Fruit & 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:

Congratulations - Seba Dalkai Boarding School has completed the Administrative Review for SY21-22. Thank you for your hard work during the review process. Keep up the great work!

**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 Assessed?

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|--|--|
| <input checked="" type="checkbox"/> No- SBP      | <input type="checkbox"/> Yes- SBP      |
| <input checked="" type="checkbox"/> No- NSLP     | <input type="checkbox"/> Yes- NSLP     |
| <input checked="" type="checkbox"/> No- SSO SBP  | <input type="checkbox"/> Yes- SSO SBP  |
| <input checked="" type="checkbox"/> No- SSO NSLP | <input type="checkbox"/> Yes- SSO NSLP |

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by July 20, 2022 to Noelle Yeo at [Noelle.Yeo@azed.gov](mailto:Noelle.Yeo@azed.gov).

Noelle Yeo

 Digitally signed by Noelle Yeo  
Date: 2022.06.16 11:48:24 -07'00'

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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 on the National School Lunch Program Administrative Review tab on the ADE website.

Equity for all students to achieve their full potential  
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