



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: Seba Dalkai School

Contacts: Lacey Yazzie, School Supervisor Cook; Maye Bigboy, Principal

Review Date: April 16, 2025

Exit Conference Date: April 16, 2025

Review Period: March 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

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| 1 | During the week of review, at least 80% of grains served at lunch were not whole grain-rich. Specifically, only 76.47% of grains served at lunch during March 3-7, 2025 were whole grain-rich. | 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/nsip/forms under the Menu Planning accordion. | <i>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.</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

Not applicable.

Meal Pattern & Nutritional Quality: Meal Components and Quantities

No findings.

Resource Management

No findings.

General Program Compliance: Civil Rights

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| 2 | The USDA nondiscrimination statement used on program materials is not the most current USDA statement. Specifically, the Notification of Benefits and Menu did not contain the most current USDA nondiscrimination statement. | Discussed where to find nondiscrimination statement on ADE's website at https://www.azed.gov/hns/civilrights and whether long or short statement would be most appropriate. | Please provide an updated Notification of Benefits and Menu with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language. |
| 3 | The Civil Rights Compliance Form is not being completed correctly. Specifically, the ethnicity data does not reflect total enrollment. | 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 https://www.azed.gov/hns/civilrights . The Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training Library accordion. | Please provide a written description of how the Civil Rights Compliance form will be completed to entirety by December 15 each year and maintained, including the individual who will be responsible for completing the form. Additionally, the certificate of completion of Step-by-Step Instruction: How to Complete the Civil Rights Compliance Form must be submitted. |
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General Program Compliance: SFA On-Site Monitoring

Not applicable.

General Program Compliance: Local Wellness Policy

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| 4 | A recent assessment of the implementation of the Local Wellness Policy has not been conducted nor have plans been developed to complete the assessment. | Discussed requirement to complete an assessment once every three years, at a minimum. The assessment must measure how the LEA is complying with their Local Wellness Policy, how the LEA's Local Wellness Policy compares to the model wellness policy, 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 https://www.azed.gov/hns/nslp/forms under the Local Wellness Policy accordion. Local Wellness Policy Assessment: Making it Meaningful Webinar can be found on ADE's website at https://www.azed.gov/hns/nslp/training under the Online Training accordion. | Please provide a written plan for conducting an assessment of the implementation of the Local 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. |
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General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

5 The School Nutrition Programs director and staff tasked with National School Lunch Program (Business Technician) 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 director and staff tasked with National School Lunch Program procurement responsibilities (Business Technician). Additionally, please provide written assurance that annual training on Federal procurement standards will be completed annually.</i>
6 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>The 8 hours of food safety training was completed on March 28, 2024. No further corrective action required.</i>
7 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>
8 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, the school clerk who fulfills duties when SFA Contact is not available and assists with point of service occasionally does not have the required training.	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 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 employees outside of the School Nutrition Program with responsibilities related to the operation of the School Nutrition Programs will receive.</i>

No findings.

General Program Compliance: Food Safety, Storage and Buy American

9	The following products observed at Seba Dalkai Boarding 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: Mandarin Oranges produced in China, Bananas produced in Mexico, and Cucumbers produced in Mexico.	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 SP38-2017, Buy American Webinar and FAQ. Additional information on the requirements of this provision, including ADE's prototype Buy American exception document, can be found on ADE's website at https://www.azed.gov/hns/nsip/forms under the Operational accordion. Buy American Recorded Webinar and FAQ can be found on ADE's website at https://www.azed.gov/hns/nsip/training under the Online Training Library accordion.	<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 and Recordkeeping

10	Reports are not submitted to the State agency as required. Specifically, the Annual Financial Report was not submitted to ADE on time.	Discussed reporting requirements for Annual Financial Report and who would be responsible for submitting by October 15 each year.	<i>Please provide steps that will be taken to ensure that the Annual Financial Report will be submitted to ADE by October 15 each year, including the title of the individual responsible for submitting it.</i>
11	Reports are not submitted to the State agency as required. Specifically, the submitted site application in CNPWeb indicated that Seba Dalkai School is operating the Afterschool Snack Program when the site is not operating the Afterschool Snack Program.	Discussed steps required to update the site application in CNPWeb to reflect current practice of not operating the Afterschool Snack Program, including notifying the assigned specialist approving applications of the update.	<i>An updated site application for Seba Dalkai School in CNPWeb indicating the current practice of not operating the Afterschool Snack Program was submitted. Please provide written assurance that the site application in CNPWeb will be updated to accurately reflect current practices whenever site operations change.</i>
12	The Food Service Annual Financial Report was submitted with inaccurate information. Specifically, the salaries reported were \$94,558.28 when \$91,797.31 was actually expended.	Reviewed and discussed errors with Food Service Director. Suggested internal controls to ensure the Food Service Annual Finance Report is accurate prior to submission.	<i>Please describe the steps that will be taken when completing the Food Service Annual Financial, including internal controls that will be implemented to ensure accuracy.</i>

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

13	Outreach to families regarding the availability of the School Breakfast Program (SBP) was not maintained from the beginning of the school year.	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.	<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 records will be maintained for at least 5 years.</i>
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| <p>14 Outreach to families regarding the availability of the Summer Food Service Program (SFSP) was not maintained from the previous school year.</p> | <p>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 https://www.azhealthzone.org/.</p> | <p><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 records will be maintained for at least 5 years.</i></p> |
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Other Federal Program Reviews: Afterschool Snack Program

Not applicable

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2025 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

Not applicable.

Comments/Recommendations:

Congratulations! Seba Dalkai Boarding School has completed the Administrative Review for the 2024-2025 program year. Thank you for your hospitality throughout 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>.

Fiscal Action Assessed?

☒ No- SBP ☐ Yes- SBP \$0

☒ No- NSLP ☐ Yes- NSLP \$0

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by June 13, 2025 to Destinee Williams at Destinee.Williams@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
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