



# ARIZONA DEPARTMENT OF EDUCATION

## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Dennehotso Boarding School  
CTD: 09-40-03  
Site: Dennehotso Boarding School

Contacts: Evangeline Bradley-Wilkinson, Principal and Patricia Begay, School Cook Supervisor

Review Date: March 26, 2026

Exit Conference Date: March 26, 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	Meal count totals were not correctly combined and recorded at breakfast and lunch during the review period. This was deemed a non-systemic error and 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.	<i>Please provide a written description of changes to the system that have been implemented to ensure that 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	Fluid milk was not available in at least two varieties at breakfast during the review period. Specifically, only 1% unflavored milk was offered at breakfast on February 2, 2026. This was not a repeat finding from the previous cycle and therefore did not contribute toward fiscal action calculations.	Discussed variety requirement and feasible options for compliance. Allowable milk varieties are fat-free, unflavored; fat-free, flavored; low-fat (1%), unflavored; and low-fat (1%) flavored. Please note that repeated violations involving milk requirements may result in fiscal action.	<i>Please provide one week of breakfast production records that demonstrate that fluid milk was available in at least two varieties. Additionally, please provide written assurance that fluid milk will always be available in at least two varieties at breakfast.</i>
3	Breakfast cereals provided to students during the review period exceeded the allowable added sugar limits. Specifically, Honey Nut Cheerios served on February 2, 2026, contained 9 grams of added sugar per dry ounce when no more than 6 grams of added sugars per dry ounce is allowable.	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> .	<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>

#### 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.

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

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- 4 Daily edit checks are not being conducted appropriately. Specifically, the attendance-adjusted enrollment is not calculated and the daily edit check did not contain all servings in the month for February 2026.
- 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 at on ADE's website at <https://www.azed.gov/hns/nslp/forms> under the Operational accordion.
- The Step-by-Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at <https://www.azed.gov/hns/nslp/training> under the Online Training Library accordion in the Counting & Claiming section.
- Please provide a completed daily edit check worksheet for the most recently submitted claim month. 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.*

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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 and Quantities**

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*No Findings.*

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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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- 5 The Local Wellness Policy did not contain all required elements. Specifically, the Local Wellness Policy did not contain a description of 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.
- Please provide a written plan for how a description of policy leadership 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.*

<p>6 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 how the wellness policy compares to model wellness policies.</p>	<p>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.</p>	<p><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 how the wellness policy compares to model wellness policies. 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></p>
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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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<p>7 The Business Manager tasked with National School Lunch Program procurement responsibilities has 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 Business Manager 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>8 Documentation was not maintained to support that the school received two food safety inspections from the local health department each school year, or that the school requested two food safety inspections each year from the local health department.</p>	<p>Discussed that each site operating must obtain two food safety inspections from the local health department per school year or maintain documentation to show that two food safety inspections were requested from the local health department each school year.</p>	<p><i>Please provide documentation to support that two food safety inspections were received during the school year or documentation to support that two food safety inspections were requested from the local health department each school year will be maintained. Additionally, please provide written assurance that two food safety inspections will be requested from the local health department each year and documentation of the request will be kept on file for 5 years.</i></p>
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9 The most recent food safety inspection report was not posted in a prominent location visible to all program participants.	Discussed making copies of most recent report and feasible places for posting, such as the main dining area, meal service line, school bulletin board, or front office.	<i>Corrected on site. The most recent food safety inspection was posted on the bulletin board in the cafeteria during the on-site visit. Please provide written assurance that it will be updated each time the school receives a food safety inspection.</i>
10 The following products observed at Dennehotso 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: Baby Corn - Thailand, Tuna - Thailand, Kiwi - Greece, and Grapes - Peru.	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.	<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**

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11 Production records are inaccurate. Specifically, production records indicate that 1/2 cup salad was served on February 3, 2026 when 1 cup salad was served.	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.	<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>
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**General Program Compliance: School Breakfast Program and Summer Food Service Program Outreach**

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12 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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*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:

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Congratulations, Dennehotso Boarding School! You have successfully completed the National School Lunch Program Administrative Review for school year 2025-2026. Well done! It is recommended to focus on the maintaining sufficient documentation regarding the Food Safety Inspections and Buy American exceptions as discussed. It is evident that your team works very hard to provide nutritious meals to your students. Keep it up!

**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	\$0.00	Not Applicable
National School Lunch Program	\$0.00	Not Applicable

Please submit corrective action response by June 25, 2026, to Megan Hoovler at [Megan.Hoovler@azed.gov](mailto:Megan.Hoovler@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  
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