



# ARIZONA DEPARTMENT OF EDUCATION

## Health and Nutrition Services Division

### Administrative Review Summary Report

School Food Authority Name: Hotevilla Bacavi Community School  
CTD: 09-91-06  
Site: Hotevilla Bacavi Community School

Contacts: Julia Donald, Principal and Kristy Honie, Business Manager

Review Date: April 21, 2026

Exit Conference Date: April 21, 2026

Review Period: March 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>
2	Flavored milk provided to students on the day of review exceeded the allowable added sugar limits. Specifically, chocolate milk served on the day of review at breakfast and lunch contained 12 grams of added sugar per 8 fluid ounces when no more than 10 grams of added sugars per 8 fluid ounces is allowable.	Discussed that beginning July 1, 2025, flavored milk may have no more than 10 grams of added sugars per 8 fluid ounces. 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 chocolate milk. Additionally, please provide written assurance that all flavored milk provided to students will contain no more than 10 grams of added sugars per 8 fluid ounces.</i>

#### Performance Standard 2: Meal Components & Quantities – Critical Area

*No Findings.*

#### Performance Standard 2: Dietary Specifications and Nutrient Analysis – Critical Area

*No Findings.*

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

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| 3 | Direct certification is not conducted according to the proper time frames. Specifically, direct certification was not conducted on or around April 1 during School Year 2025-2026. | Discussed that direct certification must be conducted on or around April 1 each school year. Referred to Direct Certification for Assistance Programs section in USDA's Eligibility Manual for School Meals 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 accordion in the USDA Manuals and Handbooks section. The NSLP At A Glance Calendar 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 Calendar and Checklists accordion. | <i>The SFA conducted Direct Certification during on-site visit. Please provide a written description of the changes that have been implemented to ensure direct certification will be conducted according to the proper timeframes. Additionally, please provide written assurance that, moving forward, direct certification will be conducted on or around April 1 each school year.</i> |
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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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| 4 | Daily edit checks are not being conducted appropriately. Specifically, breakfast counts for March 26-31, 2026, and lunch counts for March 25-31, 2026, were missing from the daily edit check and the total meal counts did not match the March 2026 claim. | 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational accordion.<br><br>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 accordion in the Counting & Claiming section. | <i>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.</i> |
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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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*No Findings.*

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**Resource Management**

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| 5 | 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. Specifically, adult lunch was priced at \$4.00 when it should have been at least \$5.02. | Discussed ways to determine adult meal prices which included a per meal cost analysis and pricing utilizing the Adult Meal Pricing Tool to price 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 Adult Meal Pricing Tool located on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms/">https://www.azed.gov/hns/nslp/forms/</a> under the Financial accordion. | <i>The SFA completed ADE's Adult Meal Pricing Tool during the on-site visit to determine the new adult meal price. Please provide documentation supporting that \$1.02 (the difference between the required price of \$5.02, and charged price x adult meals provided of \$4.00) of non-Federal funds were used to cover the price of serving adult meals served during the review period.</i> |
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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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| 6 | The Local Wellness Policy did not contain all required elements. Specifically, the Local Wellness Policy did not contain a description of public updates, policy leadership, or evaluation plan.   | 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 <a href="https://www.azed.gov/hns/nslp/training">https://www.azed.gov/hns/nslp/training</a> under the Online Training accordion.   | <i>The SFA drafted language for adding public updates, policy leadership, and an evaluation plan to the Local Wellness policy during on-site visit. Please provide a written plan for how these elements will be added to the Local Wellness Policy, including 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> |
| 7 | The public is not being notified of the existence and contents of the Local Wellness Policy.   | Discussed feasible means of notifying the public about the Local Wellness Policy such as posting it on the school website. 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 accordion.  | <i>Please provide a written description of how the public will be notified of the existence and contents of the Local Wellness Policy.</i>   |
| 8 | Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the Local Wellness Policy. Specifically, the general public was not made aware of their ability to participate in the development, review, and update of the Local Wellness Policy. | Discussed feasible means of notifying potential stakeholders of their ability to participate. Specifically, listing the meeting dates, times, and locations on the district website. 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 accordion.  | <i>Please provide a written description of how all potential stakeholders, including the general public, will be made aware of their ability to participate in the development, review, update, and implementation of the Local Wellness Policy.</i>   |
| 9 | 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 <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. 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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*Not Applicable.*

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**General Program Compliance: Professional Standards**

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| 10 | 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 <a href="https://theicn.org/icn-resources-a-z/food-safety/">https://theicn.org/icn-resources-a-z/food-safety/</a> .  | <i>Please provide the expected date that food safety certification training will be completed by the School Nutrition Program Director.</i>  |
| 11 | The Business Specialist tasked with National School Lunch Program procurement responsibilities has 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 <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. | <i>Please provide the certificate of completion of Procurement Basics (or an equivalent training on Federal procurement standards) for the Business Specialist. Additionally, please provide written assurance that annual training on Federal procurement standards will be completed annually.</i> |

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**General Program Compliance: Water**

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*Not Applicable.*

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**General Program Compliance: Food Safety, Storage and Buy American**

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| 12 | A written food safety plan has not been developed. | Discussed required components of a food safety plan and resources available on ADE's website at <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Food/Health Safety accordion. | <i>Please provide a copy of a written food safety plan.</i> |
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**General Program Compliance: Reporting and Recordkeeping**

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| 13 | Reports are not submitted to the State agency as required. Specifically, the March 2026 reimbursement claim reflected 20 serving days when there were 17 serving days in the month.  | Discussed importance of accurate reporting on the reimbursement claims and who would be responsible for verifying the information before submitting each month.   | <i>Please provide steps that will be taken to ensure that the reimbursement claims will reflect accurate information prior to being submitted to ADE, including the title of the individual responsible for submitting reimbursement claims.</i> |
| 14 | Production records did not contain all required sections. Specifically, the production records for lunch on March 2, 2026, did not contain fruit varieties or planned, prepped and leftover quantities for the biscuit served. | 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 accordion. 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 accordion. | <i>Please provide copies of completed breakfast and lunch production records for 5 consecutive days.</i>   |

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

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*No Findings.*

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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! Hotevilla Bacavi Community School has successfully completed the administrative review for the 2025-2026 School Year! It is recommended to review adult meal prices annually at the beginning of each school year to ensure they are sufficiently priced according to federal regulations. Thank you so much for your cooperation and responsiveness during the review process. It is apparent that you care for your students and take great pride in providing nutritious meals. Well done!

**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	\$8.81	Disregarded
National School Lunch Program	\$0.00	Not Applicable

Please submit corrective action response by June 30, 2026, to [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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