



**ARIZONA DEPARTMENT OF  
EDUCATION**

**Health and Nutrition Services Division**

**Administrative Review Summary Report**

School Food Authority Name: Cibecue Community School Inc.  
 CTD: 09-39-16  
 Site: Dishchii'bikoh Community School

Contacts: Marilou Areno, Superintendent and Dolores Baluyut, Business Manager

Review Date: April 23, 2024

Review Period: March 2024

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	Adult meals are being counted toward the claim for reimbursement. This contributed toward fiscal action calculations.	Discussed options for changes in the system that must be made to ensure that meals served to adults are not counted toward the claim.	<i>Please provide a written description of procedures that have been implemented to ensure that adult and non-student meals are not included in the claim for reimbursement.</i>
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**Performance Standard 2: Meal Components & Quantities – Critical Area**

2	Grain quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, on March 7, 2024, during the review period, less than 2 oz. grain was offered to students in grades 9-12, needed to meet minimum daily grain requirement): popcorn chicken served, only credits as 1 oz. grain. This was determined to be a repeat finding from cycle one 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 (e.g., changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. 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. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordingly.	<i>Please provide a written description of the changes that have been made to ensure that grain quantities meet minimum daily amounts required by the 9-12 meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.</i>
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- 3 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the daily fruit for 9-12 did not meet the daily quantities of 1 cup for the required meal patter. Only 1/2 cup fruit were served on March 7, 2024. This was determined to be a repeat finding from the previous cycle 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 (e.g., changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion.
- Please provide a written description of the changes that have been made to ensure that daily fruit quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu . Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.*
- 4 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the weekly fruit for 9-12 did not meet the weekly quantities of 5 cups for the required meal patter. Only 4 1/2 cups fruits were served on March 7, 2024. This was determined to be a repeat finding from the previous cycle 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 (e.g., changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training> under the Online Training Library accordion.
- Please provide a written description of the changes that have been made to ensure that daily fruit quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.*

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| <p>5 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the daily vegetable for 9-12 did not meet the quantities of 1 cup required by the meal pattern. On March 4-7, 2024, only 1/2 cups vegetables were served, and on March 8, 2024, only 3/8 cup was also served. This was determined to be a repeat finding from the previous cycle and 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 (e.g., changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. 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. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion.</p>   | <p><i>Please provide a written description of the changes that have been made to ensure that weekly vegetable quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu -AND-OR Step-by-Step Instruction: How to Plan a Breakfast Menu must be submitted. -AND-OR- Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.</i></p> |
| <p>6 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the weekly vegetable for 9-12 did not meet the weekly quantities of 5 cups, only 2 3/8 cups vegetables were served. This was determined to be a repeat finding from the previous cycle and 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 (e.g., changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. 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. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar &amp; Webinar Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a></p> | <p><i>Please provide a written description of the changes that have been made to ensure that weekly vegetable quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.</i></p>   |

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| <p>7 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the weekly dark green vegetable subgroup for K-8, and 9-12 did not meet the weekly quantities of 1/2 cup, only 1/4 cup dark-green was served. This was determined to be a repeat finding from the previous cycle and 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 (e.g., changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. 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. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar &amp; Webinar Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a></p> | <p><i>Please provide a written description of the changes that have been made to ensure that weekly dark green vegetable quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.</i></p> |
| <p>8 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the weekly red/orange vegetable subgroup for 9-12 did not meet the weekly quantities of 1 1/4 cups, only 1/8 cup was served. This was determined to be a repeat finding from the previous cycle and 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 (e.g., changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. 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. The Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion. The Using Appropriate Serving Utensils Recorded Webinar &amp; Webinar Slides can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a></p> | <p><i>Please provide a written description of the changes that have been made to ensure that weekly red/orange vegetable quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.</i></p> |

- 9 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the weekly red orange vegetable subgroup for 9-12 did not meet the weekly quantities of 1/14 cup, only 1/8 cup red/orange was served. This was determined to be a repeat finding from the previous cycle 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 (e.g., changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training>
- Please provide a written description of the changes that have been made to ensure that weekly red/orange vegetable quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.*
- 10 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the daily vegetable for K-8 did not meet the quantities of 3/4 cup required by the meal pattern. On March 5-7, 2024, only 1/2 cups vegetables were served, and on March 8, 2024, only 3/8 cup was also served. This was determined to be a repeat finding from the previous cycle 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 (e.g., changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training>
- Please provide a written description of the changes that have been made to ensure that daily vegetable quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.*

- 11 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the weekly vegetable for K-8 did not meet the quantities of 3 3/4 cups required by the meal pattern. only 2 7/8 cups were served. This was determined to be a repeat finding from the previous cycle 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 (e.g., changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training>
- Please provide a written description of the changes that have been made to ensure that weekly vegetable quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu, and the certificate of completion of Using Appropriate Serving Utensils must be submitted.*
- 12 Quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, the weekly red/orange vegetable subgroup for K-8 did not meet the weekly quantities of 3/4, only 5/8 cup was served. This was determined to be a repeat finding from the previous cycle 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 (e.g., changes in serving utensils, recipes, etc.). Discussed with cafeteria staff how to properly identify and count reimbursable meals, as well as procedures if a student does not select a reimbursable meal. 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. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at <http://www.azed.gov/hns/nslp/training>
- Please provide a written description of the changes that have been made to ensure that weekly red/orange vegetable quantities meet minimum amounts required by the meal pattern. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu. Additionally, the certificate of completion of Using Appropriate Serving Utensils must be submitted.*
- 13 During the week of review, at least 80% of grains served at were 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 <https://www.azed.gov/hns/nslp/forms> under the Menu Planning accordion.
- Please provide one week of [breakfast/lunch] production records and supporting documentation (CN Label, PFS, ingredient lists, Nutrition Facts labels, etc.) that demonstrate at least 80% of grains served at [breakfast/lunch] were whole grain-rich.*

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| 14 | The meal service was not structured to comply with the meal pattern requirements of the multiple grade groups that were served. SFA is menu planning so that students in 9-12 are receiving the 7-8 meal pattern, and contributed toward fiscal action calculations | Discussed allowable meal pattern grade groups per the grades served and feasible options for structuring the meal service to comply with quantity requirements (e.g., recipes changes, portion size changes, how to differentiate between students in different groups). Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 8 cents).   | <i>Please provide a written description of the changes that have been implemented to ensure that meal pattern requirements of the multiple grade groups served are met.</i>   |
| 15 | The following vegetable subgroup(s) was not offered during the review period: specifically, Beans/Peas(Legumes). This was determined to be a repeat finding from the previous cycle and contributed toward fiscal action calculations.                              | Discussed vegetable subgroup requirements for the age/grade groups served. vegetable Subgroup Quick Guide 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 Step-by-Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/training">http://www.azed.gov/hns/nslp/training</a> under the Online Training Library accordion. | <i>Please provide one week of lunch production records which demonstrate compliance with the vegetable subgroups. Additionally, please provide written assurance that moving forward, all menus will be planned to meet the vegetable subgroup requirements. Additionally, the certificate of completion of Step-by-Step Instruction: How to Plan a Lunch Menu must be submitted.</i> |

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

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No finding.

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

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No finding.

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**Meal Access & Reimbursement: Verification**

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No finding.

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

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| 16 | Daily edit checks are not being conducted. | 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 <a href="https://www.azed.gov/hns/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational accordion. 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. | <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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| 17 Offer versus Serve (OVS) was not implemented properly. Specifically, students were not given the option to decline component portion of any component.                              | Provided technical assistance on proper implementation of OVS and discussed with kitchen and point of service staff. Reviewed menu and discussed options for a reimbursable meal under OVS. USDA's Offer Versus Serve Manual, Effective beginning School Year 2015-2016 can be 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. | <i>Please provide a written description demonstrating how OVS will be implemented properly. Additionally, please provide written assurance that moving forward, OVS will be implemented properly.</i>  |
| 18 Signage which explains what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable 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 accordion.   | <i>Please provide the sign that has been displayed explaining what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i> |

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

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No finding.

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**Resource Management**

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| 19 All revenue from nonprogram foods did not accrue to the nonprofit school foodservice account. Specifically, SFA provided adult free meals; however, added adult meals to their claims and has no document to show revenue from nonprogram foods.                        | Discussed requirement that all revenue from the sale of nonprogram foods must return to the non-profit school foodservice account if nonprogram foods were purchased through the non-profit school foodservice account as specified in 7 CFR 210.14(f). Reviewed current procedures for depositing revenue from the sale of nonprogram foods to the nonprofit school foodservice account and suggested changes. Explained that the revenue from the sale of the nonprogram foods must be returned to the non-profit school foodservice account for fiscal year 2024. | <i>Please provide a written description of the procedures that will be implemented to ensure that all revenue from the sale of nonprogram foods will accrue to the nonprofit school food service account. Additionally, please provide documentation which reflects that any revenue that did not previously accrue to the nonprofit school food service account for nonprogram foods [include dollar amount] has been reimbursed to this account.</i> |
| 20 A system or process to sufficiently separate nonprogram food costs from program food costs has not been implemented. Specifically, SFA is not charging for adult meals, and a system or process is not in place to recover the cost of those meals by some other means. | Discussed revenue from nonprogram foods requirements and provided with Nonprogram Food Revenue Tool. Referred to FNS Instruction 782-5 REV. 1 for more information about pricing for nonprogram adult meals.   | <i>Please provide a description of the systems that will be developed to separate nonprogram food costs from program food costs and assurance that those systems will be implemented.</i>  |



21 Documentation was not provided to support the usage of Supply Chain Assistance funds.	<p>Discussed that the attestation statement signed by the SFA detailed that the SFA will use Supply Chain Assistance (SCA) funds only for purchasing unprocessed or minimally processed domestic food products and that SFAs are required to maintain purchasing and other related records for review and audit purposes.</p> <p>Referred to SP 03-2022: Allocation of Supply Chain Assistance (SCA) Funds to Alleviate Supply Chain Disruptions in the School Meal Programs located on ADE's website at <a href="https://www.azed.gov/hns/memos">https://www.azed.gov/hns/memos</a>.</p>	<i>Please provide documentation demonstrating how the \$ 29,735.41 of Supply Chain Assistance funds were spent.</i>
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**Procurement**

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22 The SFA did not provide written codes of conduct for procurement within the program.	<p>Discussed that non-Federal entities must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award, and administration of contracts.</p>	<i>Please provide written codes of conduct that are consistent with 2 CFR 200.318.</i>
23 The SFA did not provide documented procurement procedures.	<p>Discussed that non-Federal entities must have and use documented procurement procedures, consistent with State, local, and tribal laws and regulations and the standards of the Code of Federal Regulations for the acquisition of property or services required under a Federal award or subaward. The non-Federal entity's documented procurement procedures must conform to the procurement standards identified in 2 CFR 200.317 through 2 CFR 200.327.</p>	<i>Please provide written procurement procedures that are consistent with 2 CFR 200.317 through 2 CFR 200.327.</i>
24 Small purchase procedures were not in compliance with procurement requirements. Specifically, no solicitation, evaluation, or award documentation was provided for the following small purchases: Shamrock Foods and Sysco.	<p>Discussed that all procurement transactions for the acquisition of property or services required under a Federal award must be conducted in a manner providing full and open competition consistent with the standards of this 2 CFR 200.319 and 2 CFR 200.320. Additionally discussed that non-Federal entities must have written procedures for procurement transactions. These procedures must ensure that all solicitations incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured.</p>	<i>Please provide a written description of solicitation procedures that will be followed prior to making a small purchase including the title of the individual within the SFA responsible for conducting the solicitation for all small purchases. Additionally, please provide written assurance that all records will be maintained for 5 years.</i>

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| 25 | The SFA did not maintain oversight to ensure that contractors performed in accordance with the terms, conditions, and specifications of their contracts or purchase orders for the following small purchases: Shamrock Foods and Sysco. | Discussed that non-Federal entities must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.   | <i>Please provide a written description of the processes implemented to ensure contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.</i> |
| 26 | The SFA did not maintain oversight to ensure that food purchases complied with the Buy American provision for the following small purchases: Shamrock Foods and Sysco.  | Discussed that the non-Federal entity should, to the greatest extent practicable under a Federal award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States. Domestic preferences for procurements must be included in all subawards including all contracts and purchase orders for work or products. | <i>Please provide a written description of the processes implemented to ensure sufficient oversight with Buy American compliance when making small purchases.</i>  |

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**General Program Compliance: Civil Rights**

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| 27 | The USDA nondiscrimination statement used on program materials is not the most current USDA statement. Specifically on the monthly menu.  | Discussed where to find nondiscrimination statement on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> and whether long or short statement would be most appropriate.  | <i>Please provide an updated menu with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i>   |
| 28 | Program staff have not been trained on civil rights topics.   | Discussed requirement and how to document that requirement has been met. An acceptable civil rights power point training material can be found on ADE's website at <a href="https://www.azed.gov/hns/civilrights">https://www.azed.gov/hns/civilrights</a> .  | <i>Please provide written assurance that all food service staff will be trained at hire and as needed on Civil Rights Compliance in Child Nutrition Programs. Describe the process that will be implemented to ensure that this requirement is adhered to and properly documented.</i>  |
| 29 | The Civil Rights Compliance form is not being completed every year by December 15 and kept on file. Specifically, the Civil Rights Compliance form racial/ethnic data are not been 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 accordion. | <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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Not applicable.

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**General Program Compliance: Local Wellness Policy**

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| 30 | The Local Wellness Policy (LWP) did not contain all required elements. Specifically, the LWP did not contain specific goals for other school-based activities that promote student wellness.   | Discussed developing a LWP with goals for other school-based activities. Discussed other school-based activity ideas which included the Healthier US School Challenge, offering staff wellness training to inspire them to serve as role models, sponsoring health fairs and incorporating school gardens and/or the Farm to School Program. 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 plan for how specific goals for other school-based activities that promote student wellness will be added to the LWP. The plan should include draft language of the element to be added, who will be involved in updating the LWP, and the date the update is expected to be completed. Additionally, provide written assurance that the LWP will be specific to your institution.</i> |
| 31 | Potential stakeholders are not made aware of their ability to participate in the development, review, update, and implementation of the Local Wellness Policy (LWP). Specifically, the Local Wellness Policy is located in the employee handbook; therefore, the general public, parents and students were not made aware of their ability to participate in the development, review, and update of the LWP as specified in the Local Wellness Policy. | Discussed feasible means of notifying potential stakeholders of their ability to participate. This can be done by posting information 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 all potential stakeholders, including the general public, parents and students, will be made aware of their ability to participate in the development, review, update, and implementation of the LWP.</i>   |
| 32 | A recent assessment of the implementation of the Local Wellness Policy (LWP) 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 LWP, how the LEA's LWP 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 LWP. 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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- 33 The School Nutrition Program Director hired 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/>. *Please provide the expected date that food safety certification training will be completed by the School Nutrition Program Director.*
- 34 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. *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.*
- 35 Full-time School Nutrition Program staff have not met the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed. 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 <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. *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.*

36 Professional Standards training hours are not being tracked on an annual basis.	<p>Referred to USDA's Professional Standards Training Tracker Tool and discussed requirements for tracking. - OR- Referred to ADE's Training Tracking forms 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 Professional Standards accordion -OR- Discussed creating their own training tracker with all required information. 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.</p>	<p><i>Please provide the tracker that will be used to track Professional Standards training hours on an annual basis for all School Nutrition Program staff. Additionally, please provide written assurance that Professional Standards training hours will be tracked for all School Nutrition Program staff on an annual basis. Additionally, the certificate of completion of Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors must be provided.</i></p>
37 Part-time School Nutrition Program staff have not met the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.	<p>Discussed 4 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.</p>	<p><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 Part-time School Nutrition Program staff are registered for.</i></p>

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**General Program Compliance: Water**

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No finding.

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

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38 A written food safety plan has not been developed.	<p>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.</p>	<p><i>Please provide a copy of a written food safety plan.</i></p>
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| <p>39 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools. Specifically, fruit cocktail with pineapple may come from Indonesia, Malaysia, Thailand and the Philippines. Additionally, documentation justifying a Buy American exception was not maintained/on file. .</p> | <p>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/nslp/forms">https://www.azed.gov/hns/nslp/forms</a> under the Operational accordion. Buy American Recorded Webinar and FAQ 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 a written description of the changes that have been made to procurement 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>40 The site application in CNPWeb indicated that Dishchii'bikoh Community School is Served Only for all grades when the site is OVS for 9-12 grade for breakfast and lunch meal service.</p>   | <p>Discussed steps required to update the site application in CNPWeb to reflect current practice of OVS for 9-12 grade.</p>  | <p><i>Please resubmit a site application for Dishchii'bikoh Community School indicating that 9-12 is OVS for breakfast and lunch. Additionally, please provide written assurance that the site application in CNPWeb will accurately reflect current practices.</i></p>  |
| <p>41 Production records for both breakfast and lunch are inconsistent: Specifically, production records are not always completed to indicate the number of planned/prepared servings for each menu item served and the number of leftover/used servings.</p> | <p>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 &amp; 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.</p> | <p><i>Please provide copies of completed breakfast and lunch production records to indicate the number of planned/prepared servings for each menu item served and the number of leftover/used servings for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years. Additionally, the certificate of completion of Production Record Overview must be provided.</i></p> |
| <p>42 Production records for breakfast and lunch provided did not contain all required sections: Specifically, production records are not always completed to include the two types of milk that are served.</p>  | <p>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 &amp; 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.</p> | <p><i>Please provide copies of completed breakfast and lunch production records that include the two types of milk for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years. Additionally, the certificate of completion of Production Record Overview must be provided.</i></p>   |

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| 43 | Production record crediting is inaccurate. Specifically, pizza served on March 8, 2024 at lunch meal service, credited as 2.0 oz meat/meat alternate and 2.0 oz grain per product crediting information; however, the production record indicated it contained 1.0 oz meat/meat alternate and 1.0 grain. | 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 accordion.  | <i>Please provide a production record that reflects the correct crediting information for pizza. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i>                    |
| 44 | Production record crediting is inaccurate. Specifically, banana served at lunch service on March 7, 2024 credited as 1/2 cup per the food buying guide; however, the production record indicated it contained 1 cup of banana.   | 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 accordion.  | <i>Please provide a production record that reflects the correct crediting information for banana. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i>                   |
| 45 | Production record crediting is inaccurate. Specifically, pop corn chicken served at lunch on March 7, 2024 credited as 2.0 oz meat/meat alternate per product information; however, the production record indicated it contained 4.0 oz meat/meat alternate.   | 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 accordion.  | <i>Please provide a production record that reflects the correct crediting information for pop corn chicken. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i>         |
| 46 | Production record crediting is inaccurate. Specifically, assorted cereal cups served at breakfast on March 8, 2024 credited as 2.0 oz grain per product information; however, the production record indicated it contained 2.8 oz grain.   | 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 accordion.  | <i>Please provide a production record that reflects the correct crediting information for assorted cereal cups. Additionally, please provide a written description of changes made to ensure crediting is correctly reflected on recipes and production records.</i>     |
| 47 | Production records for breakfast did not contain all required sections: Specifically, production records provided do not indicate different portion sizes for different grade groupings.   | 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 production records for 5 consecutive days, as well as written assurance that all records will be maintained for 5 years. Additionally, the certificate of completion of Production Record Overview must be provided.</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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| 48 | The counting system employed does not result in accurate snack counts. Specifically, adult meals are bean counted in the snack counts. This contributed to fiscal action calculations. | Discussed ways to improve the counting system or alter it to ensure accurate counts are submitted in the claim for reimbursement. | <i>Please provide a written description of the system that will be implemented to ensure accurate snack counts are claimed for reimbursement.</i> |
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49 Snack production records are not being completed daily and maintained for 5 years, as is required.	Discussed record keeping requirements of the ASP. A sample production record for the ASP 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 copies of completed Afterschool Snack Program (ASP) production records for 5 consecutive days. Additionally, please provide written assurance that all records will be maintained for 5 years.</i>
50 The Afterschool Snack Program (ASP) monitoring review was not conducted within the first four weeks of operation and one additional time during the school year.	Discussed ASP monitoring requirements. A sample ASP monitoring form 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 written assurance that the ASP will be monitored once within the first four weeks of operation and one additional time during the school year, and that documentation to support this will be maintained.</i>
51 Production records and other documentation for March 4-8, 2024 do not support that all snacks counted for reimbursement contained two different components. Specifically, the production records for the month of review was not maintain for the reviewer to verify that all snacks counted for reimbursement contained two different components. This contributed towards fiscal action calculations.	Discussed the meal pattern requirements of the ASP and the requirement that a snack must contain two components if it is to be claimed for reimbursement. The ASP meal pattern chart can be found on ADE's website at <a href="https://www.azed.gov/hns/afterschool">https://www.azed.gov/hns/afterschool</a> under the Meal Pattern accordion.	<i>Please provide Afterschool Snack Program (ASP) production records for 5 consecutive days that demonstrate that each snack provided to students contains at least two components. Additionally, please provide written assurance that the ASP meal pattern will be adhered to at all times and that all snacks claimed for reimbursement will contain at least 2 different components.</i>

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**Other Federal Program Reviews: Seamless Summer Option**

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Will be reviewed in Summer 2024 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! Cibecue Community School, Inc. has completed the Administrative Review in the SY 2023-2024. It was a pleasure meeting you all- thank you for working so diligently to assure that your students are receiving nutritious meals. Please let me know if you have any questions. Thank you!



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?

<input type="checkbox"/> No- SBP	<input checked="" type="checkbox"/> Yes- SBP	\$22,006.53
<input type="checkbox"/> No- NSLP	<input checked="" type="checkbox"/> Yes- NSLP	\$38,969.40

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **July 20, 2024** to Amy Banire at [amy.dixonbanire@azed.gov](mailto:amy.dixonbanire@azed.gov).

\_\_\_\_\_  
Reviewer Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
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)  
"We are a service organization committed to raising academic outcomes and empowering parents."

This institution is an equal opportunity provider.