



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; Carla Fisher, Chief Financial Officer; Gloria Perkins, Food Service Manager

Review Date: October 30, 2019

Review Period: September 2019

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 & Benefit Issuance- Critical Area

No findings.

Performance Standard 1: Meal Counting & Claiming- Critical Area

No findings.

Performance Standard 2: Meal Components & Quantities- Critical Area

1	<p><u>Day of Review- SBP:</u> On the day of review, it was observed that 1 breakfast meal counted for reimbursement at middle/high school campus did not contain all of the required meal components: specifically, student did not select a fruit. This 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. 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. The Recognizing a Reimbursable Meal at the Point of Service Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/snparchivedwebinars/.</p>	<p><i>Please provide a written description of the changes that have been made to ensure that all meals counted for reimbursement contain all of the required meal components.</i></p>
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| <p>2 <u>Review Period- NSLP</u>: Grain quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, on one day during review period less than 2 oz.eq. grain was offered to students in grades 9-12 (2 oz.eq. needed to meet minimum daily grain requirement): hot dog bun served on 9/9 only credits as 1 oz.eq. grain. This was determined to be a repeat finding from cycle one 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 (i.e. changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. 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/trainingps/online/. The Using Appropriate Serving Utensils Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/snparchivedwebinars/. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><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.</i></p> |
| <p>3 <u>Review Period- NSLP</u>: M/MA quantities observed during the review period did not meet minimum amounts required by the meal pattern. Specifically, on one day during review period, only 1.5 M/MA was offered/served to students in grades 9-12 (2 M/MA needed to meet minimum daily M/MA requirement): the chicken & rice soup entrée served on 9/10 only contributed 1.5 M/MA towards meal pattern. This was determined to be a repeat finding from cycle one 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 (i.e. changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that M/MA quantities meet minimum daily amounts required by the 9-12 meal pattern.</i></p> |
| <p>4 <u>Review Period- NSLP</u>: Weekly minimum grain requirement was not met for week of lunch menu review. 9.5 oz.eq. grain served when 10 oz.eq. grain needed to meet minimum weekly amount required by the 9-12 meal pattern. This was determined to be a repeat finding from cycle two 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 (i.e. changes in serving utensils, recipes, etc.). Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p> | <p><i>Please provide a written description of the changes that have been made to ensure that weekly minimum grain quantities meet minimum amounts required by the 9-12 lunch meal pattern.</i></p> |

5	<u>Review Period- NSLP:</u> Weekly minimum M/MA requirement was not met for week of lunch menu review. 9.5 M/MA served when 10 M/MA needed to meet minimum weekly amount required by the 9-12 meal pattern. This was determined to be a repeat finding from cycle two 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.e. changes in serving utensils, recipes, etc.). Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).	<i>Please provide a written description of the changes that have been made to ensure that weekly M/MA meet minimum amounts required by the 9-12 lunch meal pattern.</i>
6	<u>Review Period- SBP:</u> On multiple days during week of review, fluid milk was not available in at least two varieties at breakfast. This was not a repeat finding from cycle two and did not contribute towards fiscal action calculations.	Discussed variety requirement (even for Pre-K) and feasible options for compliance. Allowable milk varieties are fat-free unflavored, fat-free flavored, 1% unflavored and 1% flavored. Please note that repeated violations involving milk requirements may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).	<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>
7	Students in grades 7-8 share a cafeteria with students in grades 9-12. SFA is menu planning so that students in 7-8 are receiving the 9-12 meal pattern. Students in grades 7-8 and 9-12 are recorded on the same lunch production records and reviewer did not observe serving utensils being switched out on day of review to accommodate the K-8 lunch meal pattern for students in 7-8th grade.	Discussed allowable meal pattern grade groups per the grades served and feasible options for structuring the meal service to comply with quantity requirements (i.e. recipes changes, portion size changes, how to differentiate between students in different groups). Per the SNP Manual & SP 10-2012 (v.9)-schools must plan menus for students using the following grade groups: K-5, 6-8, K-8, K-12 (b-fast only), and 9-12. No customization of the of the established grade groups is allowed. The school meal patterns for each grade group are intended to result in age-appropriate and nutritious meals that promote healthy weight. Discussed that 6-8 menu and 9-12 menu can be somewhat similar but portion sizes for students in 6-8 vs. 9-12 should differ because there are caloric differences between the 6-8 and 9-12 grade groups.	<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>

Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area

No findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

No findings

Meal Access & Reimbursement: Verification

No findings.

Meal Access & Reimbursement: Meal Counting & Claiming

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| 8 | The attendance factor on the daily edit check does not match the attendance factor on the monthly reimbursement claims. | 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 http://www.azed.gov/hns/nslp/forms/ . The Step by Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at http://www.azed.gov/hns/nslp/trainings/online/ . | <i>Please provide a completed daily edit check worksheet for the month of February 2020. Additionally, please provide written assurance that daily edit checks will be conducted.</i> |
| 9 | SFA is serving Pre-K students meals in their classroom but section 6 of SFA's CNPWeb sponsor application (Method of Meal Counting Description/POS Description) does not indicate that meals are served in the classroom. Therefore, this alternate point of service has not been approved by ADE. | Referred them to update site application in CNPWeb and contact their assigned specialist to let them know of the changes. | <i>Please submit a new site/sponsor application in CNPWeb that accurately reflects the alternate point of service. Additionally, please provide written assurance that site and sponsor applications in CNPWeb will accurately reflect the most current practices in operation.</i> |

Meal Pattern & Nutritional Quality: Offer Versus Serve

No findings.

Meal Pattern & Nutritional Quality: Meal Components & Quantities

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| 10 | During lunch service (at middle/high school) cashier walked away from POS to empty trash cans. Reviewer stopped multiple students that did not have a fruit or vegetable on tray and asked them to go back and grab missing component. Reviewer spoke with SNP Director/Manager and explained that cashier should not be leaving post during meal service because cashier should be verifying that all students claimed for reimbursement have a reimbursable meal. All students claimed for reimbursement received a reimbursable meal so no fiscal action was assessed. | Suggested adding an additional trash can to service area or having a custodian or teacher remove trash bag when full (if this happens during meal service). | None required at this time. |
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Resource Management

11	Lunch 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.	Discussed ways to determine adult meal prices which included a per meal cost analysis or pricing adult meals to reflect the amount of reimbursement received for a free meal plus the per meal value of entitlement and bonus commodities for non-pricing programs.	<i>The SFA has increased adult lunch price to the appropriate level for SY19-20- \$3.75. No further corrective action is required.</i>
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General Program Compliance: Civil Rights

12	The shortened USDA nondiscrimination statement used on monthly menus is not the most current USDA statement.	Discussed where to find nondiscrimination statement on ADE's website at http://www.azed.gov/hns/civilrights/ .	<i>Please provide an updated program material with the correct nondiscrimination statement. Additionally, please provide written assurance that all program materials have been updated with the proper language.</i>
13	The Civil Rights Compliance form is not being completed every year by December 15 and kept on file.	Discussed requirement for completing form and how to collect racial/ethnic data from program participants. Showed where form can be found on ADE's website at http://www.azed.gov/hns/civilrights/ . The Step by Step Instruction: How to Complete the Civil Rights Compliance Form can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/ .	<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>
14	The 'And Justice for All' poster was not displayed at each point of service. Specifically, the 'And Justice for All' poster is not hung in a prominent location in the middle/high school cafeteria and is not visible to program participants.	Discussed requirements of where poster must be placed and where to find a printable 'And Justice For All' poster on ADE's website at http://www.azed.gov/hns/civilrights/ .	<i>Please provide pictures to demonstrate the posters are now displayed near all points of service. If unable to provide pictures, please specify where the report has been posted. Additionally, please provide written assurance that the 'And Justice For All' poster has been displayed near all points of service where program participants can view it.</i>

General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

15	The LWP did not contain goals for nutrition promotion.	Discussed feasible options for nutrition promotion goals that can be written into the LWP. Discussed activity ideas which included offering contests, surveys, promotions and/or taste testing, providing information to families to encourage consumption of healthy foods at home, and displaying nutrition and health posters throughout campus. Team Nutrition Resources can be found at http://teamnutrition.usda.gov .	<i>None required at this time.</i>
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16	The LWP did not contain policies for food and beverage marketing.	Discussed updating the LWP to include policies that allow marketing and advertising of only those foods and beverages that meet Smart Snacks Standards during the school day. Explained that this requirement applies to posters, menu boards, coolers, etc.	<i>None required at this time.</i>
17	The LWP does not specify how and when a review and update of the policy is to occur.	Discussed the best setting and timeframe for the periodic review and update of the LWP as well as how this can be included in the LWP.	<i>None required at this time.</i>
18	Potential stakeholders are not made aware of their ability to participate in the development, review, update and implementation of the LWP.	Discussed feasible means of notifying potential stakeholders of their ability to participate.	<i>None required at this time.</i>
19	A recent assessment of the implementation of the 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. Sample evaluation tools can be found on ADE's website at http://www.azed.gov/hns/nslp/lwp/ . Also discussed feasible means for notifying the public of the results of the most recent assessment.	<i>None required at this time.</i>

General Program Compliance: Competitive Food Services

20	The school fundraisers were not in compliance with HNS 20-2019: Revision to Arizona Department of Education Policy on Specially Exempted Fundraisers. Specifically, on the day of review, reviewer saw a poster advertising a Senior class fundraiser. Senior class was selling Halloween candy grams available for purchase (during the school day)- the candy grams would be distributed, during the school day, on Oct. 31st. Candy does not meet Smart Snack standards and, per HNS 20-2019, the SFA did not submit a waiver request to ADE for a specially exempt fundraiser.	HNS 20-2019: Revision to Arizona Department of Education Policy on Specially Exempted Fundraisers that can be found on ADE's website at http://www.azed.gov/hns/nslp/smartsnacks/ . The Online Course: Smart Snacks and Competitive Foods Standards in Arizona can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/ .	<i>Please provide written assurance that fundraisers will be in compliance with HNS 20-2019 Revision to Arizona Department of Education Policy on Specially Exempted Fundraisers. Additionally, the certificate of completion of Online Course: Smart Snacks and Competitive Foods Standards in Arizona must be submitted.</i>
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General Program Compliance: Professional Standards

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| 21 | 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. Trainings for School Nutrition Professionals can be found on ADE's website at http://www.azed.gov/hns/nslp/training/ . The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/ . | 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. |
| 22 | Professional Standards training hours are not being adequately tracked. Reviewer was provided with a schedule showing topics that have been covered and are going to be covered during school in-service for the 2019/20 SY for food service staff. However, schedule does not meet professional standards training tracking requirements. Schedule does not track training hours for each individual employee and does not contain: employee names, titles, school name/address, key areas/topics, training learning codes, subjects, etc. | Referred to ADE's Training Tracking forms found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/ . The Online Course: Designing Your Employee Training Plan: A Course for School Nutrition Directors can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/ . | 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. |

General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

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| 23 | The most recent food safety inspection report was not posted in a publicly visible location in the middle/high school cafeteria. | Discussed making copies of most recent report and feasible places for posting. | Please provide written assurance that the most recent food safety inspection report has been posted in a location where the program participants can view it. Additionally, please specify where the report has been posted. |
| 24 | Temperature logs for food storage areas are not being maintained. Specifically, temperature logs are not being kept for cooler in cafeteria kitchen at middle/high school campus. | Discussed requirements for maintaining food storage area temperature logs, sample templates, and who would be responsible. Temperature logs for food storage areas must be maintained for 6 months. Monitoring forms can be found on ADE's website at http://www.azed.gov/hns/nslp/foodsafety/ . | Please provide a copy of the temperature log that will be used for food storage areas as well as written assurance that logs will be kept daily and maintained on-file for 6 months. |

25	The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed school: Tropical Fruit (product of Thailand) and Mandarin Oranges (product of China). Additionally, documentation justifying a Buy American exception was not maintained/on file.	Discussed the Buy American provision requirements and procedures to ensure compliance. Referred to SP38-2017, Buy American Webinar and FAQ. Funds used from the non-profit food service account must be used to procure food products that comply with the Buy American Provision. Additional information on the requirements of this provision, including ADE's prototype Buy American exception document, can be found on ADE's website at http://www.azed.gov/hns/nsfp/forms/ . Buy American Recorded Webinar and FAQ can be found on ADE's website at http://www.azed.gov/hns/sfp/ .	<i>Please provide a written description of the changes that have been made to procurement and/or recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i>
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General Program Compliance: Reporting & Recordkeeping

26	The following product could not be credited towards the meal pattern due to insufficient documentation: sausage patty. The sausage patty was served with 1 cup of oatmeal which credited as 2 oz.eq. grain at breakfast- minimum daily SBP requirements were met and fiscal action was not assessed.	Discussed requirements regarding processed product documentation and provided examples. Guidance on Product Formulation Statements and CN Labels can be found on ADE's website under the Processed Product Documentation section found at www.azed.gov/hns/nsfp/mealpattern . The CN Labels and Product Formulation Statements Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nsfp/trainingps/snparchivedwebinars/ . Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).	<i>Please provide a CN label and/or Product Formulation Statement (PFS) for sausage patty. If unable to provide a CN Label or PFS, please provide a written statement indicating the sausage patty will no longer be served. Additionally, please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation. Additionally, the certificate of completion of CN Labels and Product Formulation Statements must be submitted.</i>
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27	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 or the number of leftover/used servings for each menu item served (including condiments). Furthermore, it appears that the recorded amounts of portions served and leftover are based on total meal counts rather than physical counts of the items remaining.	Reviewer was able to determine that meal components were offered every day during the review period. Discussed requirements and reviewed production record-keeping processes and suggested changes. Discussed required sections of production records. Parts of a Production Record Guidance can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpattern/ . Production Record for Multiple Grades can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpattern/ . The Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/snparchivedwebinars/ . Please note, future violations with incomplete production records may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).	<i>Please provide copies of completed breakfast or lunch 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 & Summer Food Service Program Outreach

28	Although monthly menus are posted on school website and the parent letter/media release is distributed at the beginning of each school year, the SFA is not providing reminders throughout the school year about the availability of the SBP.	Discussed methods of notifying families of the availability of the SBP at the start of and throughout the school year and determined which was most feasible. Additionally, discussed SBP reminders must include: serving times, SBP cost and availability.	<i>Please provide a description of how households will be notified of the availability of the SBP at the beginning of and during the school year, and written assurance that this will occur.</i>
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Other Federal Program Reviews: Afterschool Snack Program

29	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: http://www.azed.gov/hns/nslp/ascspl/ .	<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>
30	The Afterschool Snack Program 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 http://www.azed.gov/hns/nslp/ascspl/ .	<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>

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2020 if applicable.

Other Federal Program Reviews: Fresh Fruit & Vegetable Program

Not applicable.

Other Federal Program Reviews: Special Milk Program

Not applicable.

Other Federal Program Reviews: At-Risk Afterschool Meals

Not applicable.

Comments/Recommendations:

Congratulations! Cibecue Community School, Inc. has completed the Administrative Review in the 2019-2020 SY. 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.

Based on your menu documentation provided for the week of review, it appears that you have opted to utilize the flexibility to serve a select number of enriched grain rich items. Please consider switching to serve 100% whole grain-rich items and join your peers who have already signed ADE's Whole Grain Pledge at: <https://www.surveymonkey.com/r/WholeGrainRichPledge>. ADE appreciates your efforts in providing quality meals to Arizona students. Thank you!

To stay on track with NSLP requirements, check out the NSLP at a Glance Calendar & Monthly Checklist on our website at <http://www.azed.gov/hns/nslp/>.

Training: In-person classes, Web-based training, and How-To guides can be found on ADE's website at <http://www.azed.gov/hns/nslp/trainings/>.

Fiscal Action Assessed?

☒ No- SBP ☐ Yes- SBP \$2.20
☐ No- NSLP ☒ Yes- NSLP **\$2,156.00**

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by **May 27, 2020** to Taryn Kunkel at Taryn.Kunkel@azed.gov or AZ Dept. of Education/Health & Nutrition 1701 N. 4th St. Flagstaff, AZ 86004.



4/14/2020

Reviewer Signature

Date



4/15/2020

Program Director Signature

Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the National School Lunch Program Administrative Review Appeal Procedures found here:

<https://cms.azed.gov/home/GetDocumentFile?id=58dbe2581130c01500d4b08b>

Kathy Hoffman, Superintendent of Public Instruction
1535 West Jefferson Street, Phoenix, Arizona 85007 • (602) 542-5460 • www.azed.gov
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