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Christopher N. Ruszkowski Susana Martinez
Secretary of Education Governor

Administrative Review Summary and Corrective Actions

SFA Name:	Beclabito Day School
SFA Code/ ID Number:	604000
Administrative Review Conducted on:	Tuesday, October 24, 2017
SFA Contact Name and Title:	Lynette Billie
CNR Reviewer:	Gavin Mack

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on Tuesday, October 24, 2017; an exit conference summarizing the findings took place on the same day.

The Administrative Review (AR) is a comprehensive evaluation of the Local Education Agency's (LEA's) National School Lunch Program (NSLP) and School Breakfast Program (SBP). The AR consists of two performance standards. While findings were identified, the two performance standards reviewed were found to be satisfactory. During the Administrative Review, compliance with the new meal pattern requirements is also evaluated, at this time there are no menu findings that warrant the termination of the performance based reimbursement.

This summary includes a comprehensive list of the technical assistance that was provided throughout the review as well as all findings that require a written response from the SFA. All items listed on the red Corrective Action tabs (Menu and Review) require a written response and must be submitted in writing to CN Resource, by **Thursday, December 21, 2017**. Please complete the responses electronically. If any additional responses are needed, please respond on district letterhead. In addition to responding to the findings please ensure that additional training is provided to all staff to bring all finding areas into compliance. Failure to submit the required materials by the due date may result in the withholding of claims. Should corrective actions not be submitted, a follow-up review may take place to ensure all required corrective actions were completed and implemented system-wide as appropriate.

Any potential fiscal action will be calculated once the corrective action responses have been received and approved.

I appreciate the courtesies extended by you and your personnel during the review. If you have questions or need assistance concerning the school food service program, please call our office. Please respond to the Administrative Review Corrective Actions by **Thursday, December 21, 2017**.

Thank you,



Casey O'Neill, RD, SNS, Senior Child Nutrition Specialist

CN Resource
1930 N Arboleda, 101, Mesa, Arizona 85213
p 866 941.6368 f 480 325.9967

Administrative Review Technical Assistance Summary

SFA Name:	Beclabito Day School
SFA Code/ID Number:	604000
Administrative Review Conducted on:	Tuesday, October 24, 2017
SFA Contact Name and title:	Lynette Billie
CNR Reviewer:	Gavin Mack

Commendations & Suggestions

Outstanding job meeting all of the requirements for the lunch menu. All daily and weekly meal component and food quantity requirements were met for the week of menu review for lunch.

The SFA was very kind and accommodating.

The Kitchen is very clean and well maintained.

Other areas of Technical Assistance (Does NOT require SFA Response)

Menu Review- technical assistance was provided in an email to the SFA with the breakfast menu review results. Suggestions were provided to bring the breakfast menu into compliance.

Wellness Policy: The SFA needs to work to improve the wellness policy and the process used to update and evaluate the process. The policy needs to be made available to the public. The easiest way to do this is to post it online. The SFA needs to establish a wellness team that consists of Administration, nurses, food service, Teachers, Students, parents and community members. The wellness team needs to evaluate the policy and make updates as needed. The SFA also needs to complete a documented assessment on the implementation of the policy at least once every 3 years. The results of the assessment need to be made available to the public once completed.

Counting and Claiming: The SFA requires a recalculation of their claims due to inaccurate claiming procedures and counting adult meals for reimbursement. Detailed technical assistance was provided regarding the recalculation procedures. The SFA must establish an accurate meal count process beginning immediately. They will need to submit 30 days of meal counts for breakfast and lunch. The corrected meal counts will be used to determine correct claims for the months of August, September and October.

Resource Management - Internal Catering

If the food service program uses funds from the nonprofit school food service to cater food or beverages for internal school departments, officials, events, meetings and/or for external organizations, the SFA must be reimbursed for these purchases. This includes board meeting snacks and meals provided to programs such as FACE. The food service department should bill the receiving department or organization and ensure payment is received in full for every catering event. Internal fund transfers can be requested through the BIE with a journal entry request to move expenses between school departments.

Professional Standards: The teachers are the point of service staff. They need additional training on how to properly count students, what qualifies as a reimbursable meal and how to document teacher meals separately. Also since the teachers have direct interaction with the students during meal service they need to complete the annual civil rights training.

SFA Name: Beclabito Day School Site(s) Selected for Review: 1 Beclabito Day School NSLP Grade Group: K-5 SBP Grade Group: K-5 N/A

SFA ID Number: 604000

Week of Menu Review: 9/11/17 - 9/15/17

Menu Review Findings: Breakfast

For the week of menu review, the breakfast menu did not meet the minimum grain requirements. The minimum portion size was not met and not all grains offered at breakfast were whole grain-rich. This contributed to not meeting the following requirements: daily grain and whole grain-rich.

Technical Assistance

During the Administrative Review the results of the menu review were provided in a detailed Menu Review Results Report. Recommendations were included to bring all areas into compliance. All menus served within the SFA for the School Breakfast Program must meet all daily and weekly meal pattern requirements for the specific grade group. The SFA was encouraged to provide training as needed to ensure compliance. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews, may result in fiscal action.

For detailed regulations see: 7 CFR 220.10

Required Criteria for Response to Findings	SFA Response	CNR Internal	
		Appv	Intls.
1. Provide a statement that all menus will be reviewed to ensure that all components are offered in at least the minimum amount required to meet the daily and weekly requirements as applicable.			
2. Provide a written process for sites to reference when they do not have one of the planned menu items or there are insufficient quantities on the serving day.			
3. Provide a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available.			
4. Submit the position title(s) of the SFA representative(s) that will oversee this area and ensure future compliance.			
5. Submit 1 week of menus and production records that indicate all menu items, the portion size and the component contribution for each item.			

6. Provide labels, ingredient lists, CN labels, product formulation statements, and revised or new recipes as needed for any items that have been added to the menu, if they have replaced an item, indicate the item that it replaced.

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Required Corrective Actions- Review Areas
New Mexico Public Education
Coordinated School Health & Wellness
Administrative Review Corrective Action Plan

SFA Name: Beclabito Day School
 SFA Code/ID: 604000

Administrative Review Conducted: Tuesday, October 24, 2017
 Site(s) Selected for Review: Beclabito Day School

Date Corrective Action Plan was provided to SFA: 11/21/2017

Due Date for Corrective Action Plan: 12/21/2017

The following pages address the findings that were identified during the Administrative Review. There is an area for a response for each finding.
Please enter the detailed response for each in the spaces provided .

Finding #1: Counting and Claiming			
Meal count totals by category have not been combined or recorded correctly. This is a systematic error. The SFA is claiming adult meals. A recalculation of the claim is required. 30 days of correct meal counts must be submitted to CNResource to complete the recalculation.			
Technical Assistance			
During the review, accurate meal counts were discussed with the SFA. The SFA cannot claim Adult meals. Meal count totals by category have not been combined or recorded correctly. This is a non-systematic error. To be in compliance, the SFA must ensure that meal counts are being recorded accurately. Consolidating meal counts by category was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.			
<i>For detailed regulation see: 210.7(c)(1) Lunch count system.</i>			
Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a statement that explains the new/revised process that will be implemented to ensure that meal counts are correctly combined and recorded for the claim for reimbursement.			

Finding #2: Counting and Claiming			
There are days when the free, reduced price, or paid lunch counts exceeded the number of attendance adjusted eligible students. This was for 50% or more of the serving days, and there was no acceptable explanation. A recalculation of the claim is required.			
Technical Assistance			
During the review, edit checks were discussed with the SFA. There are days when the free, reduced price, or paid lunch counts exceeded the number of attendance adjusted eligible students. This was for 50% or more of the serving days, and there was not acceptable explanation. To be in compliance, the SFA must ensure that edit			

checks are completed accurately. Maintaining accurate edit checks was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.

For detailed regulation see: 210.7(c) Reimbursement limitations.

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a detailed explanation of the new/revised process that will be implemented at the point of service to ensure an accurate counting and claiming system.			

Finding #3: Civil Rights

The SFA does not have a procedure in place for handling civil rights complaints.

Technical Assistance

During the review the requirement for the SFA to have a complaint procedure was discussed. The procedure must indicate: that any person or representative alleging discrimination based on a prohibited basis has the right to file a complaint; all complaints, written or verbal, must be forwarded to the appropriate Regional or FNS OCR Director, unless an approved State complaint procedure is in place; in the event a complainant makes the allegations verbally or in person and refuses or is not inclined to place such allegations in writing, the person to whom the allegations are made must write up the elements of the complaint for the complainant. The procedure must also identify the outside agency to which the complaints are forwarded.

For detailed regulation see: FNS Instruction 113-1 Section XV Complaint Procedures

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a written procedure for how the SFA will handle any alleged civil rights complaints.			

Finding #4: Wellness Policy

The SFAs Local Wellness Policy does not contain all of the required components. The Wellness Policy does not include a plan for measuring implementation and it does not include designation of one or more SFA officials in charge of school compliance oversight.

Technical Assistance

During the review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to contain the following: a designation of one or more SFA officials in charge of school compliance oversight; a plan for measuring compliance; goals for nutrition education, nutrition promotion, other school based activities to promote student wellness, and physical activity; and guidance for all foods available on school campus. The SFA should also contact the state agency to determine if there are any additional requirements from the state or if they have any state specific resources. The SFA was provided with the USDA link for Wellness Policies.

<http://www.fns.usda.gov/tn/local-school-wellness-policy>

For detailed regulation see: 210.31 Local school wellness policy

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a copy of the completed Local Wellness Policy.			
4. If the SFA needs more time to finish the Local Wellness Policy, provide a timeline for when parts of the plan will be completed.			

Finding #5: Professional Standards

Employees that work outside of the school nutrition program whose responsibility include duties related to the operation of the nutrition program did not receive the required annual civil right training. They also need additional training on proper point of service procedures.

Technical Assistance

During the review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that employees outside of the School Nutrition programs (whose responsibilities include duties related to the operation of the School Nutrition program) receive adequate training specific to the task they perform. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

For detailed regulation see: SP 39-2015: Question 29

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. List the names, length, and date of trainings that have been completed/planned to meet the required training applicable to their duties in the program.			

Finding #6: Food Safety

The SFA does not have a food safety plan.

Technical Assistance

During the review, the food safety plan was discussed with the SFA. The SFA must have a complete food safety plan that includes all of the required sections as specified by USDA. The SFA must have a food safety plan available at each site so that food service staff may stay in compliance with food safety requirements and procedures.

For detailed regulation see: 210.13(c) Food safety program.

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a statement that a complete food safety plan has been developed and is available at each site within the SFA.			
4. Provide the following Standard Operating Procedures (SOP) from the food safety plan: Receiving Deliveries, Washing Hands and Date Marking Ready-to-Eat, Potentially Hazardous Foods.			

Finding #7: Food Safety

The SFA does not have documentation to show that they requested the two required health inspections from the applicable agency per school year.

Technical Assistance

During the review, health inspections were discussed with the SFA. The SFA must request two health inspections for each site for each school year and must maintain documentation of this request.

For detailed regulation see: 210.13(b) Food safety inspections.

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Pr3. Provide a written statement that the SFA will annually request two inspections be completed and all documentation will be retained on file for the required time period.			

Finding #8: SFSP Outreach

The SFA has not performed SFSP outreach.

Technical Assistance

It was determined during the review that the SFA has not performed SFSP outreach. The SFA must perform SFSP outreach before the end of the school year. Methods of outreach such as posting SFSP information on the SFA's website, parent newsletters and district-wide emails were discussed with the SFA.

Schools may fulfill this requirement through Robo calls, flyers or other methods that notify the community of locations of summer meal sites.

Methods to locate sites that serve free meals to children during the summer include the following:

- Call 211

- Call 1-866-2Hungry or 1-877-8Home

- Call 1.800.574.HUNGRY or 1.877.8.FAMILY

- Visit the website: www.fns.usda.gov/summerfoodrocks (note, this replaces the whyhungry.org website)

- Use the site locator for smartphones - Rangeapp.org

For detailed regulation see: 210.12(d) Outreach activities. (2)

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a written statement that the SFA will cooperate with Summer Food Service Program sponsors to conduct outreach on the availability of the Summer Food Service Program.			

Finding #9: Community Eligibility Provision

The SFA has not maintained documentation for the Community Eligibility Provision enrollment on site.

Technical Assistance

Local educational agencies that elect to participate in the special assistance provisions set forth in this section must retain implementation records for each of the participating schools. Failure to maintain sufficient records may result in the State agency requiring the school to return to standard meal counting and claiming procedures and/or fiscal action.

For detailed regulation see: 245.9 (h) Special Assistance Certification and Reimbursement Alternatives

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a statement that moving forward the SFA will maintain all CEP data on-site, for the duration of their participation in CEP or for a minimum of 3 years plus the current school year, which ever is longer.			

Finding #10: Resource Management

The SFA offers nonprogram adult meals for free without collecting reimbursement.

Technical Assistance

Only food service employees may eat for free at the cost of the food service program. Any other staff members, visiting adults, or "lunch duty" staff must pay for the full cost of their meal, as outlined in FNS Instruction 782-5. If they will not be charged directly, the food service program must be reimbursed for the full cost of these meals. The SFA should bill the department that will pay for the free meals, submit the funds transfer request to the BIE, and ensure the funds are received by the food service



Required Corrective Actions- Review Areas
P.O. Box 31060
Mesa, AZ 85275
866-941-6368
adminreview@cnresource.com

Helpful Resources

The following are a list of links to resources that may be helpful when responding to the findings from the Administrative Review and helping to bring all finding areas into compliance.

USDA Federal Regulations:

National School Lunch Program: [USDA FNS 7 CFR 210](#)

School Breakfast Program: [USDA FNS 7 CFR 220](#)

Determining Eligibility: [USDA FNS 7 CFR 245](#)

Certification and Benefit Issuance:

2017-2018 Federal Income Eligibility Guidelines:

<https://www.fns.usda.gov/school-meals/fr-041017>

2017-2018 USDA prototype Household Application and supporting forms:

<https://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals>

Verification:

2017-2018 USDA prototype Household Application and supporting forms:

<https://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals>

Counting and Claiming:

2017-2018 USDA Reimbursement Rates:

<https://www.fns.usda.gov/school-meals/rates-reimbursement>

Menu Compliance:

USDA Nutrition Standards for School Meals:

<https://www.fns.usda.gov/school-meals/nutrition-standards-school-meals>

Whole Grain Resource Guide:

<https://fns-prod.azureedge.net/sites/default/files/WholeGrainResource.pdf>

Meal Pattern Guide by Grade Group:

<https://fns-prod.azureedge.net/sites/default/files/dietaryspecs.pdf>

Offer vs Serve:

USDA Offer versus Serve Guidance Manual:

<https://fns-prod.azureedge.net/sites/default/files/SP57-2014a.pdf>

Resource Management:

2017-2018 USDA Paid Lunch Equity Tool:

<https://www.fns.usda.gov/school-meals/paid-lunch-equity-sy2017-18-calculations-and-revised-tool>

USDA Non-Program Food Revenue Tool:

<https://www.fns.usda.gov/guidance-paid-lunch-equity-and-revenue-nonprogram-foods>

Civil Rights:

USDA Non-Discrimination Statement

<https://www.fns.usda.gov/fns-nondiscrimination-statement>

USDA-FNS Accommodating Children with Disabilities in the School Meal Programs

<https://fns-prod.azureedge.net/sites/default/files/cn/SP40-2017a1.pdf>

On-Site Monitoring:

USDA On-Site Monitoring forms for National School Lunch and School Breakfast Programs:

<https://fns-prod.azureedge.net/sites/default/files/cn/SP56-2016os.pdf>

Wellness Policy:

USDA Wellness Policy Implementation Tools and Resources:

<https://www.fns.usda.gov/tn/implementation-tools-and-resources>

Smart Snacks:

USDA Guide to Smart Snacks:

<https://fns-prod.azureedge.net/sites/default/files/tn/USDASmartSnacks.pdf>

Professional Standards:

USDA Professional Standards tools and references:

<https://www.fns.usda.gov/school-meals/professional-standards>

Food Safety:

USDA Food Safety Resources:

<https://www.fns.usda.gov/ofs/food-safety>

Institute of Child Nutrition Food Safety Plan:

<http://www.theicn.org/ResourceOverview.aspx?ID=75>

Buy American Provision:

2017 USDA Memo on Compliance with Buy American Provision:

<https://fns-prod.azureedge.net/sites/default/files/cn/SP38-2017os.pdf>

School Breakfast and Summer Food Service Program Outreach:

<https://www.fns.usda.gov/sfsp/raise-awareness>

Afterschool Snack Program:

USDA Webpage for the Afterschool Snack Program:

<https://www.fns.usda.gov/school-meals/afterschool-snacks>

Special Milk Program:

USDA Webpage for the Special Milk Program:

<https://www.fns.usda.gov/smp/special-milk-program>

Fresh Fruit and Vegetable Program:

USDA Fresh Fruit and Vegetable Program Handbook:

<https://fns-prod.azureedge.net/sites/default/files/handbook.pdf>

Community Eligibility Provision and Provision II:

USDA Community Eligibility Guidance and Updated FAQs:

<https://www.fns.usda.gov/community-eligibility-provision-guidance-and-updated-qas-1>