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Christopher N. Ruszkowski Susana Martinez
Secretary of Education Governor

Administrative Review Summary and Corrective Actions

SFA Name:	Central Consolidated
SFA Code/ ID Number:	067000
Administrative Review Conducted on:	10/25/2017-10/27/2017
SFA Contact Name and Title:	Margene Purcella
CNR Reviewer:	Gavin Mack

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on October 25, 2017; an exit conference summarizing the findings took place on October 27, 2017.

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 **Wednesday, December 20, 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 **Wednesday, December 20, 2017**.

Thank you,



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

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1930 N Arboleda, 101, Mesa, Arizona 85213
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Administrative Review Technical Assistance Summary

SFA Name:	Central Consolidated
SFA Code/ID Number:	067000
Administrative Review Conducted on:	10/25/2017-10/27/2017
SFA Contact Name and title:	Margene Purcella
CNR Reviewer:	Gavin Mack

Commendations & Suggestions

Outstanding job meeting all of the requirements for breakfast at all 3 sites. All daily and weekly meal component and food quantity requirements were met for the week of menu review for breakfast.

Excellent work meeting the whole grain-rich requirement for all breakfast and lunch menus, for the week of menu review.

Great job being so prepared and organized especially with the Professional Standards Information.

Staff members at all sites were very kind and accommodating.

The SFA does run a very efficient and organized program.

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

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

Resource Management - NonProgram Food Revenue Tool

The SFA incorrectly completed the USDA NonProgram Food Revenue Tool. The SFA did not input the cost of nonprogram food, and input the total food costs instead of the cost for reimbursable meal food. The reviewer sent the SFA an optional excel tool called the "Nonprogram Food Revenue Tool Breakdown" to help the SFA properly complete the USDA tool. During the review, the SFA correctly completed the USDA tool and found they were out of compliance. The SFA should reference the technical assistance provided during this review when completing the tool in the future, including the most recent USDA nonprogram food memo (<https://www.fns.usda.gov/nonprofit-school-food-service-account-nonprogram-food-revenue-requirements>). The SFA should ensure their staff are properly trained on how to complete the USDA NonProgram Food Revenue Tool.

Afterschool Snack Program- Teachers are not correctly indicating left over/second meals served for the after school snack program at all sites on the production record. Technical assistance provided to have the production record completely filled out.

Menu Review- Consider serving Newcomb Middle School smaller portions for lunch, following the 6-8 grade group requirements. Currently the middle school is served the same portions as the high school, which may result is excessive nutrients (calories, sodium, and saturated fat) for the middle school.

Local School Wellness Policy- During the review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to be made available to the public. The easiest method would be to post the wellness policy on the SFAs website. They can also send it out in a newsletter. The Local Wellness Policy is required to be reviewed and updated on a periodic basis to ensure that the policy reflects current requirements and SFA practices.

The SFA is required to allow certain parties - parents, students, representatives of the school food authority, teachers of physical education, school health professions, the school board, school administrators, and the general public - to participate in the development, implementation, periodic review, and update of the Local Wellness Policy.

The SFA is required to perform an assessment of the Local Wellness Policy at a minimum once every three years. The results of the assessment need to be made available to the public. The SFA should use the results of the assessment to determine any changes or updates that need to be made to the wellness policy.

SFA Name: <i>Central Consolidated</i>	Site(s) Selected for Review: 1 <i>Eva Stokely Elementary</i>	NSLP Grade Group: K-5	SBP Grade Group: K-5	<input type="checkbox"/> N/A
SFA ID Number: <i>067000</i>	2 <i>Nizhoni Elementary</i>	NSLP Grade Group: K-5	SBP Grade Group:	<input checked="" type="checkbox"/> N/A
Week of Menu Review: <u>9/11/17 - 9/15/17</u>	3 <i>Newcomb High School</i>	NSLP Grade Group: 6-12	SBP Grade Group: 6-12	<input type="checkbox"/> N/A

Menu Review Findings: Lunch

Site 1: Eva Stokely Elementary
For the week of menu review, the weekly grain based dessert requirement was not met for lunch. No more than 2 ounce equivalents of grain based desserts may be offered weekly.

Site 2: Nizhoni Elementary
For the week of menu review, the weekly grain based dessert requirement was not met for lunch. No more than 2 ounce equivalents of grain based desserts may be offered weekly.

Site 3: Newcomb High School (9-12)
For the week of menu review, the lunch menu did not meet the minimum daily and weekly requirements for meat/meat alternate. A meat/meat alternate was offered daily, however the minimum daily and weekly requirements were not met.

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 National School Lunch 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 210.10

Required Criteria for Response to Findings	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide a written 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.			
2. List the steps that will be taken when a site does not have one of the planned menu items or there is insufficient quantities on the serving day.			
3. Provide a written 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.			



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

SFA Name: Central Consolidated
 SFA Code/ID: 067000

Administrative Review Conducted: 10/25/2017-10/27/2017
 Site(s) Selected for Review: Eva Stokely Elementary
Nizhoni Elementary
Newcomb High School

Date Corrective Action Plan was provided to SFA: 11/20/2017

Due Date for Corrective Action Plan: 12/20/2017

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: Resource Management						
Resource Management - The SFA had an excess of three months average expenditures in its year-end net cash resources, and did not have approval from the State Agency.						
Technical Assistance						
The SFA must not accumulate net cash resources exceeding three months' average expenditures, unless they receive prior approval from the State Agency. During the review it was determined that the SFA had an excess cash balance of over \$1.39 million and did not have prior approval from the State Agency. Additional technical assistance was given during the review, explaining how to calculate compliance with net cash resource requirements. The SFA should submit a spend-down plan explaining how the net cash resources will be spent down to an appropriate level. The SFA can purchase new equipment, improve food quality, upgrade food service software, implement additional food service training, increase food service wages and benefits where appropriate, etc. in order to improve the food service program.						
<i>For detailed regulation see: 210.14(b) Net cash resources.</i>						
Required SFA Response	SFA Response	CNR Internal Use				
1. Submit a spend-down plan explaining how the SFA will lower the nonprofit school food service fund balance to a level at or below 3 months average expenditures. This should include estimated dates and amounts of any planned purchases/costs, as well as an expected timeline for spending down the balance.		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%; text-align: center;">Appv.</th> <th style="width: 50%; text-align: center;">Intls.</th> </tr> <tr> <td style="height: 50px;"></td> <td style="height: 50px;"></td> </tr> </table>	Appv.	Intls.		
Appv.	Intls.					

2. Provide a written statement explaining the internal controls that have been put into place to ensure that the food service net cash resource balance will remain under 3-months' average expenses in the future or prior approval will be received from the State Agency if an excess balance is expected.			
3. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			

Finding #2: Resource Management

Resource Management - The SFA purchased equipment over \$5,000 without prior approval from the State Agency.

Technical Assistance

The SFA must receive approval from their State Agency prior to purchasing any non-expendable personal property with a useful life of a year or longer and an acquisition cost of \$5,000 or more, using school food service funds. Purchasing equipment and other capital assets expose the program to greater risk than routine expenditures, therefore it is important to follow the State Agency's pre-approval process. The SFA purchased a convection steamer, an electric range, and a food service vehicle during the review year, for a total of \$42,055 in capital asset purchases without prior approval. The PED Equipment Over \$5,000 Approval Form can be found on the PED School Nutrition website: <http://www.ped.state.nm.us/nutrition/>.

For detailed regulation see: FNS Policy Memo SP 31-2014

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide written assurance that the SFA will request prior approval from their State Agency prior to purchasing capital assets with an acquisition cost of \$5,000 or more with food service funds.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			

Finding #3: Resource Management

Resource Management - The SFA has not sufficiently priced its nonprogram foods to be in compliance with revenue from nonprogram food requirements.

Technical Assistance

The SFA's NonProgram Food Revenue Tool showed that the SFA required additional nonprogram revenue to be in compliance. The SFA did not price its nonprogram foods at a sufficient rate to ensure its revenue ratio equaled or exceeded its food cost ratio. The SFA is charging less than the free reimbursement rate for the meals vended to the Head Start program. Therefore the SFA is generating less revenue per nonprogram meal served than the revenue received for a reimbursable program meal. The SFA should increase vended meal prices to at least the USDA free reimbursement rate to help ensure compliance with nonprogram revenue requirements.

For detailed regulation see: 210.14(f) Revenue from nonprogram foods.

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.

1. List the steps the SFA will take to increase nonprogram food revenues. This should include the specific price increases and the date the increases will take effect.			
2. Provide a written statement of understanding that the USDA Nonprogram Food Revenue Tool will be correctly completed every year to assess compliance with nonprogram food requirements, and that the SFA will take the necessary steps to come into compliance if the tool shows they did not generate sufficient nonfederal revenue.			
3. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			

Finding #4: Meal Components and Quantities- Day of Review

Signage is not posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal for breakfast at all sites. This is a repeat finding.

Technical Assistance

During the review, the importance of signage was discussed with the SFA. The SFA must ensure that signage is posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal.

For detailed regulation see:

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 meal signage has been posted.			

Finding #5: Local School 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.			

Check the confirmation check box, sign and date the form (typing in your signature is acceptable) and upload the signed copy to cnrsupport.com by the due date indicated.

By checking this box you confirm that all of the above responses have been reviewed and are representative of practices within the SFA. In addition the SFA ensures that additional training will be provided to all applicable staff to bring all finding areas into compliance moving forward.

Signature of SFA Representative: _____
 Signature of CN Resource Reviewer: Gavin Mack

Date: _____
 Date: October 27, 2017

If you have any questions, feel free to contact CN Resource at your convenience. Thank you.



Administrative Review Team
 CN Resource
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 866-941-6368
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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/ofsf/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>