



New Mexico Public Education Department
Coordinated School Health & Wellness Bureau
Administrative Review Corrective Action Plan

Name of School Food Authority: **Cimarron Municipal Schools**
School Site reviewed: **Cimarron Elementary**

Date of On-Site Review: **November 3, 2016**

Date Corrective Action Plan Was provided to SFA: **January 31, 2017**

Date your Corrective Action Plan Response is due to NMPED: **March 3, 2017**

COMMENDATIONS

PERFORMANCE STANDARD 1
Correct Income Eligibility Guidelines used
Household notification was provided to eligible students per regulations
Edit checks are being performed as required

PERFORMANCE STANDARD 2
Meals looked appetizing
Production records continuously maintained
Two types of fluid milk available at each meal service

GENERAL AREAS
Civil Rights poster and training in compliance
On-site monitoring form completed as required
Potable water available and free

The following pages address the findings that were identified during your Administrative Review. For each finding you will be presented with the following:

- A summary of the regulation / requirement
- Suggested guidance for the SFA in order to achieve compliance
- The finding, and details specific to the SFA regarding the finding
- SFA area for reply to state how, when and by whom corrections will be made
- The Code of Federal Regulations citation number or alternate resource citation



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Please provide a detailed response to each finding in the spaces provided

Finding #1

Students that were directly certified didn't receive household notification of eligibility that they were directly certified

Regulation / Citation Summary

7 CFR 245.6 (b) (5) (ii)(A)

(b) Direct certification. In lieu of requiring a household to complete the free and reduced price meal or free milk application, as specified in paragraph (a) of this section, the local educational agency must certify children as eligible for free meals or free milk in accordance with paragraph (b)(1)(i) of this section or may certify children as eligible for free meals or free milk in accordance with paragraph (b)(2) of this section. If a household also submits an application for directly certified children, the direct certification eligibility determination will take precedence.

(5) Direct certification documentation. (i) The required documentation for direct certification is provided in paragraph (2) of the definition of *Documentation* in §245.2.

(ii) (A) Beginning in School Year 2012-2013, direct certification with *SNAP* shall be conducted using a data matching technique only. Letters to households for direct certification may be used only as an additional means to notify households of children's eligibility based on receipt of *SNAP* benefits. The last period that letters to households may be used as the primary method for direct certification is School Year 2011-2012. While such notices cannot be the primary method used by a state to document receipt of *SNAP*, the local educational agency shall accept such a letter if presented by a household.

SFA Suggested Guidance for Compliance

1. Describe preventative measures to avoid this occurrence in the future.
2. List the person and title that is responsible for the Direct Certification report compliance.

SFA Response

Finding #2

Household notification for denied students wasn't sent in accordance with regulation.

Regulation / Citation Summary

§245.6 Application, eligibility and certification of children for free and reduced price meals and free milk. (c) *Determination of eligibility*



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(7) *Denied applications and the notice of denial.* When the application furnished by a family is not complete or does not meet the eligibility criteria for free or reduced price benefits, the local educational agency must document and retain the reasons for ineligibility and must retain the denied application. In addition, the local educational agency must promptly provide written notice to each family denied benefits. At a minimum, this notice shall include:

(i) The reason for the denial of benefits, e.g. income in excess of allowable limits or incomplete application;

(ii) Notification of the right to appeal;

(iii) Instructions on how to appeal; and

(iv) A statement reminding parents that they may reapply for free or reduced price benefits at any time during the school year.

(8) *Appeals of denied benefits.* A family that wishes to appeal an application that was denied may do so in accordance with the procedures established by the local educational agency as required by §245.7. However, prior to initiating the hearing procedure, the family may request a conference to provide the opportunity for the family and local educational agency officials to discuss the situation, present information, and obtain an explanation of the data submitted in the application or the decision rendered. The request for a conference shall not in any way prejudice or diminish the right to a fair hearing. The local educational authority shall promptly schedule a fair hearing, if requested.

SFA Suggested Guidance for Compliance

1. Describe preventative measures to avoid this occurrence in the future.
2. List the person and title that is responsible for the sending out denial letters to households

SFA Response

Finding #3

Dates on food items missing in dry storage and in refrigerator

Regulation / Citation Summary

7 CFR 210.13 Facilities management (d)

(d) *Storage.* The school food authority shall ensure that the necessary facilities for



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storage, preparation and service of food are maintained. Facilities for the handling, storage, and distribution of purchased and donated foods shall be such as to properly safeguard against theft, spoilage and other loss

SFA Suggested Guidance for Compliance

1. Describe preventative measures to avoid this occurrence in the future.
2. List the person and title that is responsible for putting the dates on the food products

SFA Response

Finding #4

Verification of free and reduced applications was not performed in SY 15-16.

Regulation / Citation Summary

§245.6a Verification requirements.

(c) *Verification requirement*—(1) *General*. The local educational agency must verify eligibility of children in a sample of household applications approved for free and reduced price meal benefits for that school year.

(3) *Standard sample size*. Unless eligible for an alternative sample size under paragraph (d) of this section, the sample size for each local educational agency shall equal the lesser of:

(i) Three (3) percent of all applications approved by the local educational agency for the school year, as of October 1 of the school year, selected from error prone applications; or

(ii) 3,000 error prone applications approved by the local educational agency for the school year, as of October 1 of the school year.

(iii) Local educational agencies shall not exceed the standard sample size in paragraphs (c)(3)(i) or (c)(3)(ii) of this section, as applicable, and, unless eligible for one of the alternative sample sizes provided in paragraph (c)(4) of this section, the local educational agency shall not use a smaller sample size than those in paragraphs (c)(3)(i) or (c)(3)(ii) of this section, as applicable.

(iv) If the number of error-prone applications exceeds the required sample size, the local educational agency shall select the required sample at random, i.e., each application has an equal chance of being selected, from the total number of error-prone applications.



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SFA Suggested Guidance for Compliance
<ol style="list-style-type: none">1. Describe preventative measures to avoid this occurrence in the future.2. List the person and title that is responsible for verification
SFA Response

Finding #5
The requirement of total fruit (including juice) served daily is a minimum of 1 cup. For breakfast, fruit served daily is .5 cup, which is not meeting the minimum requirements.
Regulation / Citation Summary
7 CFR 210.10 Nutrition standards and menu planning approaches for lunches and requirements for after school snacks
SFA Suggested Guidance for Compliance
<ol style="list-style-type: none">1. Correct the fruit (including juice) served to meet 1 cup daily, which will then total 4 cups weekly. (Four day School week.)2. Provide all required documentation (Production Records, Recipes, Labels, etc).
SFA Response

Finding #6
Cimarron Elementary School is meeting all daily requirements for WG Rich- Grains. However, the weekly requirement is 6.5oz. The school is currently serving 6oz of WG Rich- Grains weekly, which is not meeting the minimum requirements.
The required amount served of Vegetables - Vegetable Subgroup Other is .5 cup weekly. The site is currently serving .25 cups of Vegetable- Other weekly.



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Regulation / Citation Summary
7 CFR 210.10 Nutrition standards and menu planning approaches for lunches and requirements for after school snacks
SFA Suggested Guidance for Compliance
<ol style="list-style-type: none">1. Correct the amount of Vegetables- Subgroup Other served weekly by adding or adjusting current recipes. Provide the proper documentation of the changes (Production Records, Recipes, Labels, etc.)2. Correct the amount of WG Rich Grains served throughout the week by adding or adjusting current recipes. Provide proper documentation of the changes (Production Records, Recipes, Labels, etc.).3. Take the Nutritional Quality and Meal Pattern Compliance for Menu Planners course and Post Test. Please provide the certificate of completion once the course is completed.
SFA Response

Finding #7
Production records must contain documentation of all items served for each meal, including all components and condiments served. Condiments served are not on the current production records.
Regulation / Citation Summary
7 CFR 210.10 Nutrition standards and menu planning approaches for lunches and requirements for after school snacks
SFA Suggested Guidance for Compliance
<ol style="list-style-type: none">1. Take the Production Record Course and Post Test. Please submit certificate of completion once the course has been completed.2. Update production records to include condiments. This must include the amount planned for the day as well as the amount used for the day. Please provide documentation of the updates.
SFA Response



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Finding #8

1. The maximum amount of calories allowed for Breakfast for the K-5 age group is 500. The average calories of Cimarron Elementary School is 533kcal, which is over the amount allowed.
2. The maximum amount of sodium allowed for Breakfast for the K-5 age group is less than or equal to 540mg. The average amount of sodium served at Cimarron Elementary School is 597mg.

Regulation / Citation Summary

7 CFR 210.10 Nutrition standards and menu planning approaches for lunches and requirements for after school snacks

SFA Suggested Guidance for Compliance

1. **Correct the menu by replacing or finding substitutes for current menu items in order to meet the calorie and sodium requirements. Provide all documentation needed in order to show corrections in menu (Production Records, Recipes, Labels, etc). Take the Nutritional Quality and Meal Pattern Compliance for Meal Planners course and Post Test. Submit the certificate of completion once completed.**

SFA Response

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Finding #9

Hairnets were not worn by kitchen staff who were preparing and serving food for meals served to children on the day of the review

Regulation / Citation Summary

7 CFR 210.13 Facilities management

(a) Health standards. The school food authority shall ensure that food storage, preparation and service is in accordance with the sanitation and health standards established under State and local law and regulations.

SFA Suggested Guidance for Compliance

1. **Describe preventative measures to prevent this occurrence in the future.**
2. **Provide an update to the SFA Policy if one is in place.**

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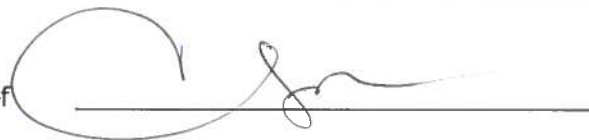
SFA Response

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Technical Assistance Provided

- Provide children with summer food outreach such as flyers, web postings.
- Confirmation of applications needs to occur

Signature of Reviewer:



Date:

1/31/17

Signature of Nutritionist

Allison Scobbie

Date:

01/27/17

Signature of SFA Representative:

Date:

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

**Name of Reviewer: Claudia Duran, Health Educator
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Please insert your detailed responses, save, print, sign, and scan/email or mail the signed copy to your Reviewer at the address above by the due date indicated. Thank you.