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Christopher N. Ruszkowski Susana Martinez
Secretary of Education Governor

Administrative Review Summary and Corrective Actions

SFA Name:	Crystal Boarding School
SFA Code/ ID Number:	608000
Administrative Review Conducted on:	Wednesday, October 25, 2017
SFA Contact Name and Title:	Diane Bydonnie, FSD
CNR Reviewer:	Danielle Reidy

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 the same day/or enter date of exit conference.

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

CN Resource

1930 N Arboleda, 101, Mesa, Arizona 85213

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Administrative Review Technical Assistance Summary

SFA Name:	Crystal Boarding School
SFA Code/ID Number:	608000
Administrative Review Conducted on:	Wednesday, October 25, 2017
SFA Contact Name and title:	Diane Bydonnie, FSD
CNR Reviewer:	Danielle Reidy

Commendations & Suggestions

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

The paid adult lunch price of \$4.00 meets adult meal pricing requirements. Thank you for increasing prices since the last Administrative Review.

Great work serving all whole grain-rich products for the week of menu review.

The SFA does a great job running an efficient meal service line.

The SFA has a great relationship with students.

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

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

Resource Management - Adult Meals

The SFA should keep a running total of adult meal sales, as these nonprogram food sales are included in "total revenue" for the food service program. The SFA submitted individual adult meal cash receipts, but did not have a consolidated report showing the total adult meal sales for the year. The SFA should know how much revenue they are generating from nonprogram (adult meal) sales.

Meal Counting and Claiming - To be in compliance, the SFA must ensure that meal counts taken daily at the point of service correctly identify the number of free, reduced priced and paid lunches served. Tracking students accurately at the point of service was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.

Civil Rights - During the on-site review the requirement to provide a yearly civil rights training was discussed with the SFA. The SFA must provide civil rights training at least once a year to all frontline staff and supervisor and maintain all required documentation. The SFA has plans to complete the training for all program staff this school year.

Civil Rights - During the review the requirement for the "And Justice for All" poster were discussed with the SFA. The new poster was hanging in the office and an old poster was hanging in the cafeteria. The SFA immediately posted the correct poster in the cafeteria.

Local School Wellness Policy - During the review, Local Wellness Policies were discussed with the SFA. 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.

Food Safety - During the review, Buy American requirements were discussed with the SFA. The SFA must purchase, to the maximum extent practicable, domestic commodities or products. "Domestic commodity or product" is defined as an agricultural commodity that is produced in the U.S. and a food product that is processed in the U.S. substantially using agricultural commodities produced in the U.S. There are limited exceptions to the Buy American provision which allow for the purchase of foods not meeting the "domestic" standard in circumstances when use of domestic foods is truly not practicable. The SFA must keep documentation justifying the limited exception(s). These exceptions, as determined by the SFA, are:

- The product is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality; or
- Competitive bids reveal the costs of a U.S. product are significantly higher than the non-domestic product.

SFA Name:	Site(s) Selected for Review:	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
<i>Crystal Boarding School</i>	1 <i>Crystal Boarding School</i>	K-8	K-8	<input type="checkbox"/> N/A
SFA ID Number:	2 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
<i>608000</i>	3 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
Week of Menu Review:				
<i>9/11/17 - 9/15/17</i>				

Menu Review Findings: Lunch

Site 1:

For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the dark green vegetable subgroup.

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 are 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: Crystal Boarding School
 SFA Code/ID: 608000

Administrative Review Conducted: Wednesday, October 25, 2017
 Site(s) Selected for Review: Crystal Boarding School
N/A
N/A

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						
The SFA did not provide a Statement of Revenues & Expenditures for the nonprofit school food service account. The resource management comprehensive review form could not be completed.						
Technical Assistance						
The SFA was requested to submit a food service Statement of Revenues and Expenditures for the SY 16-17. This is required in order to complete the Maintenance of the Food Service Account section of the comprehensive review form. The statement should include a summary of all revenues received and expenditures incurred by the food service program from July 1 to June 30, broken down by category (USDA reimbursements, food purchases, labor costs, etc.), as well as a bottom line profit and/or loss for the year. If the SFA does not have such a report on file, they must contact the BIE and request a report for the deposits recorded to 167A2100FF and the expenses recorded to 167A2100DD.						
The SFA was able to provide manual records showing total USDA reimbursements, individual adult meal cash receipts, and all food purchases, but the reviewer could not confirm these were properly recorded to the food service ledger. The SFA did not know the total revenues and total expenditures for the food service program. This is a repeat finding from the SY 15-16 Administrative Review, and no improvements were found during this review. The SFA needs to take action to ensure proper financial management of federal funds awarded under the National School Lunch Program. This should include conducting an annual budget review of the food service program and requesting regular financial reports from the BIE. Additionally, free food service financial management training can be found through the Institute of Child Nutrition's "Financial Management: A Course for School Food Service Directors" (http://www.nfsmi.org/).						
<i>For detailed regulation see: 210.19(a)(1) Assurance of compliance for finance.</i>						
Required SFA Response	SFA Response	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="2" style="font-size: small;">CNR Internal Use</td> </tr> <tr> <td style="font-size: x-small;">Appv.</td> <td style="font-size: x-small;">Intls.</td> </tr> </table>	CNR Internal Use		Appv.	Intls.
CNR Internal Use						
Appv.	Intls.					

<p>1. Provide a food service Statement of Revenues & Expenditures for the SY 16-17. This must include all revenues received and expenditures incurred by the food service program from July 1 to June 30, broken down by category.</p>			
<p>2. Provide written assurance that the business technician understands how to conduct a year end review of the food service program. This should include assurance that the business technician knows who at the BIE they should contact with questions about the food service program's finances.</p>			

Finding #2: 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 claimed that another department paid for the free staff meals, but could not provide documentation to prove this. 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 program. These meals should accrue as nonprogram revenue to the food service account. Per FNS Instruction 782-5, the SFA should be charging at least \$3.47 (\$3.24 USDA reimbursement + \$.23 commodities). The SFA was sent a copy of the October 2015 PED memo concerning Program Adult Meals. This memo clarifies that lunch duty staff cannot eat for free, as they do not meet the definition of a program adult.

For detailed regulation see: FNS Instruction 782-5, Rev. 1

Required SFA Response	SFA Response	<i>CNR Internal Use</i>	
		<i>Appv.</i>	<i>Intls.</i>

<p>Provide documentation showing that the SFA has either started to reimburse the food service account for the free nonprogram adult meals or has discontinued their policy of offering free nonprogram adult meals. If the food service program will be reimbursed, include:</p> <ol style="list-style-type: none"> 1) The source of the nonfederal funds (the general fund, outside organization, etc.). 2) The frequency at which the food service program will be reimbursed (weekly, monthly, etc.). 3) The rate the food service program will charge for these meals. 4) If the reimbursement will come from an internal school transfer, provide an explanation showing that you know how to request a journal entry for an inter-departmental transfer through the BIE. 			
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Finding #3: Resource Management

The SFA did not reimburse the food service account for catering expenses.

Technical Assistance

The food service program used funds from the nonprofit school food service to cater food or beverages for internal school departments, officials, events, meetings and/or for external organizations, but was not reimbursed for these purchases. This is an unallowable use of food service funds. If catering services are provided, the food and labor expenses incurred must be reimbursed to the food service account. The food service department should bill the receiving department or organization and ensure payment is received in full for every catering event. This includes board meeting snacks requested by the principal, and meals provided to programs such as FACE. Internal fund transfers can be requested through the BIE with a journal entry request to move expenses between school departments.

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

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
<p>1. Provide documentation showing that the SFA has implemented a procedure for reimbursing the food service account for catering expenses. This could include a sample invoice or catering request form, and a sample journal entry request form to be sent to the BIE for interdepartmental catering reimbursements.</p>			

2. Provide written assurance that the business technician understands how to process catering reimbursement requests through the BIE. This could include written instructions from the BIE.			
3. Provide written assurance that the food service staff have been trained to file reimbursement requests for any catering services provided.			

Finding #4: Resource Management

The SFA could not demonstrate that adult meal revenues accrued to the food service account.

Technical Assistance

The SFA provided cash receipts showing the adult meal payments collected for SY 16-17, but was unable to provide a revenue report showing the cash was deposited into the food service account. The SFA needs to provide documentation showing that the collections were sent to the BIE and properly recorded to the SFA's food service revenue account (167A2100FF). The amount should total \$499.25 for the SY 16-17.

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

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide a revenue report showing the \$499.25 in adult meal sales were deposited to the food service account.			

Finding #5: Civil Rights

The SFA did not submit a public release.

Technical Assistance

During the review the requirement for a public release to be submitted for publishing was discussed with the SFA. At or near the beginning of each year, the SFA must submit a public release to the local media, the unemployment office and any major employers who are contemplating large layoffs in the attendance area of the school.

For detailed regulation see: 245.5(a)(1) Public Release

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 of assurance that a public release will be submitted for publishing at or near the beginning of each school year.			
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Finding #6: Civil Rights

The SFA has not collected racial/ethnic data on an annual basis.

Technical Assistance

During the review the requirement to collect racial/ethnic data was discussed with the SFA. The SFA must collect racial/ethnic on an annual basis through the mechanism of their choosing.

For detailed regulation see: FNS Instruction 113-1 Appendix B Section F

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 of assurance that this information will be collected annually.			
4. Provide a copy of the completed racial/ethnic data collection sheet.			

Finding #7: Professional Standards

The school nutrition staff did not meet the training requirements, and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements.

Technical Assistance

During the review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that the School Nutrition staff complete the required amount of training annually. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

For detailed regulation see: 210.30(d) Continuing education/training standards for all staff

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 food safety training hours.			

Finding #8: Food Safety

The SFA does not have a food safety plan. This a repeat finding from the Administrative Review conducted during SY 2015-16

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 #9: Food Safety

The SFA did not request two health inspections for each school year. The is a repeat finding from the Administrative Review conducted during SY 2015-16

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. Provide a written statement that the SFA has requested two health inspections for the current school year and will annually request two inspections be completed moving forward.			
4. Provide a copy of the inspection request.			

Finding #10: Food Safety

Storage violations were observed on-site. The SFA had food that was opened and not dated with date opened.

Technical Assistance

During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated once opened.

For detailed regulation see: 210.13(d) (d) Storage.

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 all food items are dated with the date the product was opened.			

Finding #11: Special Provisions

The SFA's documentation does not support the Identified Student Percentages and claiming percentages at the time of the latest CEP approval, as the SFA did not have documentation to support the total enrollment that was used to establish the Identified Student Percentages.

Technical Assistance

During the review, having the proper documentation for all Identified Students was discussed with the SFA. To be in compliance, the SFA must maintain source documentation for all directly certified students, such as direct certification lists and/or other lists certifying that students are categorically eligible for free school meals, including lists of students who are designated as homeless or migrant. The SFA must also maintain documentation of the total enrollment used to establish the Identified Student Percentages.

For detailed regulation see: SP 15-2016: CEP State Agency 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 statement of understanding that the SFA must keep all proper documentation used to establish the Identified Student Percentages and claiming percentages.			

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

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: _____

Date: _____

Signature of CN Resource Reviewer: *Danielle Reidy*

Date: October 25, 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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 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>