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Christopher N. Ruzkowski Susana Martinez
Secretary of Education Governor

Administrative Review Summary and Corrective Actions

SFA Name:	Cuba Independent Schools
SFA Code/ ID Number:	062000
Administrative Review Conducted on:	Friday, November 3, 2017
SFA Contact Name and Title:	Rhiannon Chavez, Business Manager
CNR Reviewer:	Richard Cumnard

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on Friday, November 3, 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
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CN Resource 1930 N Arboleda, 101, Mesa, Arizona 85213 480 325.9966

Administrative Review Technical Assistance Summary

SFA Name:	Cuba Independent Schools
SFA Code/ID Number:	062000
Administrative Review Conducted on:	Friday, November 3, 2017
SFA Contact Name and title:	Rhiannon Chavez, Business Manager
CNR Reviewer:	Richard Cumnard

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.
Great job with the Food Service. Great variety of food offerings. Good POS setup.
Great Food Safety plan. Great job with Food Storage.

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

Lunch Menu Review- technical assistance was provided in an email to the SFA with the menu review results. Suggestions were provided to bring the lunch menus into compliance. The SFA submitted corrective action for the week of menu review, prior to the onsite review date. Corrective action was submitted for the following lunch menu review findings: daily and weekly meat/meat alternate, daily and weekly grains, and whole grain-rich. No further corrective action is needed.
Civil Rights- technical assistance provided that FNS staff needs to sign in to all training classes.
Local School Wellness Policy- technical assistance provided that 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.
Local School Wellness Policy- technical assistance provided that once an assessment of the implementation of the Local School Wellness Policy is completed, the public needs to be made aware of it via household correspondence, and/or posting it on SFA website
Professional Standards- technical assistance provided that all training documentation of FSMC employees that work at SFA location should also be retained by SFA.
Food Safety- technical assistance provided that SFA should have all food safety inspection documentation for all food safety inspections. If the SFA is missing an inspection report, they should request a copy from the health department.
Resource Management - Nonprogram Food Revenue Tool The SFA should consider completing the NonProgram Food Revenue Tool for a 5-day reference period instead of using a full year's data. Completing the tool for a full year requires the SFA to make estimations that lead to a less accurate tool. The SFA should follow the guidelines in USDA memo SP 20-2016, which explain the 5-day reference period and how to cost out the program and nonprogram foods. A link to USDA memo SP 20-2016 was sent in an email during this review and can be found on the USDA website.



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

SFA Name: Cuba Independent Schools
 SFA Code/ID: 062000

Administrative Review Conducted: Friday, November 3, 2017
 Site(s) Selected for Review: Cuba High School
Friday, November 3, 2017

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: Resource Management		
Technical Assistance		
The SFA offers nonprogram adult meals for free without collecting reimbursement.		
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 or organization that will pay for the free meals and ensure the non-federal funds are received by the food service program. These meals should accrue as nonprogram revenue to the food service account. The SFA was sent a copy of the October 2015 PED memo concerning Program Adult Meals. This memo clarifies that the SFA's lunch counters and custodians cannot eat for free, as they do not meet the definition of a program adult.		
For detailed regulation see: 2210.10(a)(3) Production and menu records.		
Required SFA Response	SFA Response	CNR Internal Use
		Appv. Intls.

<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. 			
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Finding #2: Resource Management

The SFA's adult meal price is not in compliance with FNS Instruction 782-5, Rev. 1.

Technical Assistance

The SFA has priced their adult meals below the cost of producing these meals. Adult meals should be priced at least at the free student per-meal reimbursements and the value of commodities received. The SFA should be charging at least \$3.47 (\$3.24 USDA reimbursement + \$.2325 commodities). The SFA's adult lunch price of \$3.00 is not meeting this requirement. The SFA should increase adult meal prices to an appropriate level.

Reimbursement rates and the commodities value per-meal can be found on the USDA website:

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

<https://www.fns.usda.gov/fdd/value-donated-foods-notice>

For detailed regulation see: 210.9(c) Afterschool care requirements.

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. This should include documentation			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a written statement outlining the SFA's adult meal pricing policy. This policy should establish guidelines for an annual reassessment of adult meal prices in line with FNS Instruction 782-5.			

Finding #3: Afterschool Snack Program

Based on the number of components listed and the number of meals claimed, production records do not support that each snack claimed for reimbursement met the 2 component per student requirements. There were 2 days that did not have 2 components offered for a total of 136 snacks.

Technical Assistance

During the review, production record, component, and portion size requirements were discussed with the SFA. The SFA has two days on their menu when carrot sticks are served with a 100% fruit juice product (Ice Dog or Sidekick). Per ASP regulations, both items come from the same component category and an additional component needs to be served (i.e. grain/bread, milk, or meat/meat alternate) for a reimbursable snack to be claimed. The SFA must complete production records and serve snacks as described in 7 CFR 210.10(a)(3) and 7 CFR 210.10(o)(2). This finding may result in fiscal action.

For detailed regulation see: 210.10(a)(3) Production and menu records.

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 complete production records for the snack program that contain all required information.			
4. Provide revised snack menus for the next time this menu would be offered to show compliance with the snack meal pattern.			

Finding #4: Afterschool Snack Program

The program is not monitored twice per year.

Technical Assistance

During the review, program monitoring was discussed with the SFA. The SFA must monitor the program twice per year.

For detailed regulation see: 210.9(c) Afterschool care requirements.

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 monitor the Afterschool Snack Program twice per year.			
4. The SFA must also complete the monitoring reviews and submit them or, if early in the year, must provide the date when monitoring will occur.			

Finding #5: Professional Standards

The part-time 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

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 training hours.			

Finding #6: Offer versus Serve

The cafeteria staff has not been trained on Offer versus Serve.

Technical Assistance

During the review, the training requirement for Offer versus Serve was discussed. If the SFA is going to implement Offer vs. Serve, they should annually train their staff and train new staff as needed. On going training should be provided depending on needs to staff in order to be in compliance with Offer vs. Serve procedures.

For detailed regulation see: Offer vs. Serve Guidance Manual (Page 4)

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 steps the SFA will take to ensure that all staff will be trained annually on Offer versus Serve.			

Finding #7: 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:

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.

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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: Richard Cumard

Date: _____
 Date: November 3, 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/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>