



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

SFA Name: _____ Dzilh-Na-O-Dith-Hle Community School
 Administrative Review Conducted on: _____ 4/26/2017
 Site(s) Selected for Review: _____ Dzilh-Na-O-Dith-Hle Community School

Date Corrective Action Plan was provided to SFA: _____ 5/15/2017
Due Date for Corrective Action Plan: _____ 6/14/2017

The following pages address the findings that were identified during your Administrative Review.

For each finding you will be presented with the following:

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

Please provide a detailed response to each finding in the space provided.

Finding #1
Resource Management Comprehensive Review: NonProgram Food Compliance The SFA did not complete the USDA Nonprogram Food Revenue Tool.
Technical Assistance Provided
The NonProgram Food Revenue Tool should be completed every year. You can use a one-week reference period instead of gathering numbers for an entire year. This tool should include adult meals as your nonprogram foods. If the tool shows you are out of compliance, you need to increase nonprogram food prices (even if you are meeting the USDA adult meal pricing guidelines). A copy of the tool and a link to the USDA memo was sent in an email during this review. Both documents can be found on the USDA website.
Regulation / Citation and Summary

7 CFR 210.14 (f) Revenue from non-program foods. Beginning July 1, 2011, school food authorities shall ensure that the revenue generated from the sale of non-program foods complies with the requirements in this paragraph.

(1) Definition of non-program foods. For the purposes of this paragraph, non-program foods are those foods and beverages; (i) Sold in a participating school other than reimbursable meals and meal supplements; and (ii) Purchased using funds from the nonprofit school food service account.

(2) Revenue from non-program foods. The proportion of total revenue from the sale of non-program foods to total revenue of the school food service account shall be equal to or greater than: (i) The proportion of total food costs associated with obtaining non-program foods (ii) The total costs associated with obtaining program and non-program foods from the account.

SFA Suggested Guidance for Compliance

As the corrective action response, please explain the process that will be put into place to ensure that the USDA Nonprogram Food Revenue Tool is completed each year. This should include a timeframe for when the tool will be completed, and the steps that will be taken if the tool shows you are out of compliance.

SFA Response

Finding #2

The site had products in storage that violated the Buy American provision and no documentation was available to show domestic alternatives were considered. Additionally, the SFA was not sure if the Buy American clause is part of the product specification language.

Technical Assistance Provided

The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf. The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

Regulation / Citation and Summary

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the "domestic" standard as described above ("non-domestic") in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

SFA Suggested Guidance for Compliance

To come into compliance with the Buy American requirement the SFA must provide a statement that they will ensure language is included in procurement documentation, ensure they are aware of and utilizing the procurement manual when communicating with distributors.

SFA Response

Finding #3

The SFA did not have the most recent food safety inspection report posted in a publicly visible location.

Technical Assistance Provided

During the review, health inspections were discussed with the SFA. The SFA must post a copy of the most recent food safety inspection in a publically visible location at the site.

Regulation / Citation and Summary

210.13(b) Food safety inspections. Schools shall obtain a minimum of two food safety inspections during each school year conducted by a State or local governmental agency responsible for food safety inspections. They shall post in a publicly visible location a report of the most recent inspection conducted, and provide a copy of the inspection report to a member of the public upon request.

SFA Suggested Guidance for Compliance

To come into compliance with this finding the SFA must submit a statement that the SFA will post the health inspection report in a visible location. The statement would also include; a statement that moving forward the most recent inspection will always be posted in a visible location. Provide the date that the inspection report was posted.

SFA Response

Finding #4

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

Technical Assistance Provided

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.

Regulation / Citation and Summary

220.8(a)(2) Unit pricing. Schools must price each meal as a unit. The price of a reimbursable lunch

does not change if the student does not take a food item or requests smaller portions. Schools must identify, near or at the beginning of the serving line(s), the food items that constitute the unit-priced reimbursable school meal(s).

SFA Suggested Guidance for Compliance

To come into compliance with the meal signage requirements the SFA must state that the proper signage has been posted. Please submit a copy of the signage used and indicate where in the serving line it was posted. Also please note the date that the signage was posted. Include the person by position that will oversee that the signage has been posted and how this person will keep all staff informed that signage is required.

SFA Response

Signature of Reviewer: Debbie Hawkins

Date: April 26, 2017

Signature of SFA Representative: _____

Date: _____

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



Administrative Review Team

CN Resource

P.O. Box 31060

Mesa, AZ 85275

866-941-6368

adminreview@cnresource.com

Please insert your detailed responses, save, print, sign, scan and upload the signed copy to cnrsupport.com by the due date indicated. Thank you.