State of New Mexico Public Education Department

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Christopher N. Ruszkowski Susana Martinez
Secretary of Education Governor

Administrative Review Summary and Corrective Actions

SFA Name:	House Municipal Schools
SFA Code/ ID Number:	050000
Administrative Review Conducted on:	Wednesday, October 25, 2017
SFA Contact Name and Title:	Lisa Downey, Business Manager
CNR Reviewer:	Debbie Hawkins

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 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,

Cay Other RD

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

CN Resource 1930 N Arboleda, 101, Mesa, Arizona 85213 p. 866 941 6368 | f. 480 325 9967

Administrative Review Technical Assistance Summary

SFA Name:	House Municipal Schools
SFA Code/ID Number:	050000
Administrative Review Conducted on:	Wednesday, October 25, 2017
SFA Contact Name and title:	Lisa Downey, Business Manager
CNR Reviewer:	Debbie Hawkins

Commendations & Suggestions

Great job meeting all fruit and vegetable requirements for the week of menu review!

Thank you for your kind accommodations during the review. You were able to pull the required information quickly which is appreciated.

The school was bright and cheerful and the students seemed happy to be there.

All areas of concern were addressed quickly. Your willingness to make the necessary changes to the serving line and other program areas demonstrate a great desire to run the program according to program regulations.

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.

Confirmation Review - technical assistance was provided that a Confirmation Review should be an actual review of the application to determine if it was determined correctly, not just a signature.

Eligibility - technical assistance provided to update eligibility on the electronic system once the letter is sent to the family.

Meal Components - technical assistance was provided to the kitchen staff to make sure they are using the correct serving utensils for each item served.

Special Dietary Needs - technical assistance was provided that a milk substitute must be offered for students with lactose intolerance. The preschool student does not usually participate, but the parent sends milk when they do. TA provided that the SFA must offer the milk substitute in order to claim the meal for reimbursement. The student did not participate on the day of review.

And Justice for All Poster - the site had an old civil rights poster. They were provided with the updated poster and it was posted immediately.

Professional Standards - technical assistance was provided regarding tracking professional standards training. The SFA was informed about the USDA tool and where to find it.

Extended Eligibility - technical assistance provided regarding extending SNAP benefits to every member of a household, not just the dependents of the person receiving the benefits. There were no students who did not have the appropriate benefits.

Local Wellness Policy - Local Wellness Policies were discussed with the SFA. The SFA is required to perform an assessment of the Local Wellness Policy at a minimum at least once every three years. The results of the assessment must be made available to the public.



NSLP Grade Group:

SFA Name: *House Municipal Schools* SFA ID Number: Site(s) Selected for Review:

1 House Municipal School

2 N/A

NSLP Grade Group: 9-12

NSLP Grade Group:

3 N/A

SBP Grade Group: 9-12	□ N/A
SBP Grade Group:	☐ N/A
SBP Grade Group:	□ N/A

Week of Menu Review: 9/11-17 - 9/14/17

Menu Review	Findings:	Lunch
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Site 1:

050000

- 1. For the week of menu review, the lunch menu did not meet the minimum grain requirements. The minimum portion size was not met and not all grains offered at lunch were whole grain-rich. This contributed to not meeting the following requirements: daily grain, weekly grain, and whole grain-rich. This is a repeat finding.
- 2. 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. This is a repeat finding.
- 3. For the week of menu review, the lunch menu did not meet milk requirements. Fluid milk offered must be low-fat (1% milk fat or less, unflavored) or fat-free (flavored or unflavored). 1% chocolate milk was served. This was a finding on the day of review as well.

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 CNR Internal Use **Required Criteria for Response to Findings SFA Response** Арру. 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.		ĺ

Menu Review Findings: Breakfast

1. For the week of menu review, the breakfast menu did not meet milk requirements. Fluid milk offered must be low-fat (1% milk fat or less, unflavored) or fat-free (flavored or unflavored). 1% chocolate milk was served. This was a finding on the day of review as well.

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 School Breakfast 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 220.10

Required Criteria for Response to Findings SFA Response		CNR Internal	
Required Criteria for Response to Findings	31 A Nesponse	Appv	Intls.
1. Provide a 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 as applicable.			
2. Provide a written process for sites to reference when they do not have one of the planned menu items or there are insufficient quantities on the serving day.			
3. Provide a 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.			













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

SFA Name:	House Municipal Schoo	ols	Administrative Review C	.onauctea: _	vvednesday	, October 25,	2017
SFA Code/ID:	050000		Site(s) Selected for Review:		House Municip	al School	
			•		N/A		
					N/A		
Date Corrective Action	Plan was provided to SFA:	11/21/2017	Due Date for	Corrective A	ction Plan:	12/21/201	<u>.7</u>
The following pag	es address the findings that wer	e identified during the A	dministrative Review. There is	an area for a	a response for e	ach finding.	
	· ·	•	or each in the spaces provided		•	O	
	F-		I December 1				
		nding #1: Certification ar					
Not all selected applications wer	e approved correctly. The SFA d		·				
		Technical Assi					
During the review, determining a		•	•	· ·		_	
confirming official. When deteri	mining eligibility a careful review	of the income amount	isted and the family size must	be used to d	etermine eligibi	lity based on	the
most current Income Eligibility G	Guidelines. This application was	chosen for Verification a	nd the documentation provide	ed by the fam	nily validated the	e income info	rmation
on the application.							
For a	detailed regulation see: Eligibilit	v Manual Chapter 3 Det	erminina Eliaibility for Applicat	tions based o	n income		
	SFA Response		SFA Respons			CNR In	ternal Use
·	·		SFA RESPONS			Арру.	Intls.
1. Provide the date that the find		e or					
the planned date of completion.							
2. Provide the name(s) and title(s) of the SFA representative(s) t	hat					
will ensure compliance.							
3. Provide a copy of the letter se	ent to the family notifying them	of the					
change in eligibility.							

Finding #2: Certification and Benefit Issuance

Technical Assistance

During the review the SFA was informed that the hearing official may not have any part in determining the applications.



The hearing official may not also be the confirming official.

For detail	led regulation see: 245.7(a)(2)(vii)		
Required SFA Response	SFA Response	CNR Inte	ernal Use
Required SIA Response	STA RESPONSE	Арру.	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 hearing official will			
not also be involved in determining the applications.			
4. Provide the person, by position, who will be the hearing official and			
confirming official.			

Finding #3: Meal Counting and Claiming

The breakfast point of service did not provide an accurate meal count by eligibility status. This is a systemic error. Milk and juice were in a separate room from the serving line. Students were counted before it could be determined that they had at least 1/2 cup of fruit and other components of a reimbursable meal.

Technical Assistance

To be in compliance, the SFA must ensure that meal counts taken 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. The SFA determined to move the milk cooler to the serving line area and all students will be required to go through the line to pick up their breakfast items. The point of service will be located at the end of the serving line. Students will be required to have all components before their meals are counted.

For detailed regu	ılation see: 210.7(c)(1) Lunch count system.		
Required SFA Response	SFA Response	CNR Inte	ernal Use
nequired of A neopolise	STATESPONSE	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 breakfast meal counts for 30 days, beginning October 30,			
2017.			

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. 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: 220.8(a)(2) Unit pricing. CNR Internal Use Appv. Intls.



Required Corrective Actions- Review Areas



Finding #7: Local School Wellness Policy

The SFA does not have a Local School Wellness Policy that contains all the required components.

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 regula	tion see: 210.31 Local School Wellness Policy		
Required SFA Response	SFA Response	CNR Internal Use	
·	SITTRESPONSE	Арру.	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.			

Finding #8: Food Safety and Storage

Storage violations were observed on-site. The SFA had food that was not dated upon delivery.

Technical Assistance

During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated upon delivery, including freezer items.

For detailed	regulation see: 210.13(d) (d) Storage.		
Required SFA Response	A Response		ernal Use Intls.
Provide the date that the finding was brought into compliance or the planned date of completion.		Appv.	iiitis.
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			



delivery date.

Finding #9: Summer Food Outreach

The SFA has not performed SFSP outreach.

Technical Assistance

It was determined during the review that the SFA has not performed SFSP outreach. The SFA must perform SFSP outreach before the end of the school year. Methods of outreach such as posting SFSP information on the SFA's website, parent newsletters and district-wide emails were discussed with the SFA.

Schools may fulfill this requirement through Robo calls, flyers or other methods that notify the community of locations of summer meal sites.

Methods to locate sites that serve free meals to children during the summer include the following:

- •Call 211
- •Call 1.866.3Hungry or 1.877.8Hambre
- •Visit the website: www.fns.usda.gov/summerfoodrocks (note, this replaces the whyhunger.org website)
- •Use the site locator for smartphones Rangeapp.org

For detailed regulation see, 210 12(d) Outroach activities (2)

Tor detailed regula	ation see: 210.12(a) Outreach activities. (2)	CNID	
Required SFA Response	SFA Response	CNR Internal L	
· · · ·		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 will cooperate with			
Summer Food Service Program sponsors to conduct outreach on the			
availability of the Summer Food Service Program.			

Finding #10: Verification

Not all applications selected for review were verified correctly. The SFA did not determine the correct eligibility based on household income and size.

Technical Assistance

During the review, properly determining the correct eligibility, based on household income and size, was discussed with the SFA. To determine eligibility, the SFA must follow the procedures for processing applications and submitted eligibility documents as outlined in the Eligibility Manual for School Meals, Chapter 3, as well as the procedures for verifying applications as outlined in Chapter 4.

For detailed regulation see: Eligibility Manual Chapter 2A

Required SFA Response SFA Response	SEA Paspansa	CNR Internal Use	
	SFA RESPONSE	Appv.	Intls.
1. Provide the date that the finding was brought into compliance or			
the planned date of completion.			





Finding #13: Resource Management

The SFA did not provide the requested documentation to complete the Maintenance of the NonProfit School Food Service Account portion of the resource management review. The reviewer was unable to determine compliance with net cash resource limitations.

Technical Assistance

The SFA was asked to submit a Statement of Revenues & Expenditures for SY 16-17, as well as a Balance Sheet as of June 30, 2016. The SFA only submitted a summary expense report for Fund 21000, and did not submit any revenue or fund balance information, despite repeated requests by the reviewers. The SFA had an excess cash balance during the SY 15-16 per their audit report, and the reviewer was unable to confirm if the SFA is still out of compliance. The SFA must submit a revenue report for Fund 21000 for SY 16-17, as well as the Balance Sheet for Fund 21000 as of June 30, 2016. Alternately, the SFA could submit the entire Fund 21000 trial balance for SY 16-17. If the SFA's ending fund balance exceeds the 3 month average expenses, the SFA must submit a spend-down plan explaining how they will reduce the excess balance. 3 month average expenses can be determined by taking total expenses for the year, dividing by 9 operating months, and multiplying by 3. The SFA received an excess net cash resource finding on their previous Administrative Review.

For detailed regulation see: 210.14(b) Net cash resources. CNR Internal Use **SFA Response** Required SFA Response Appv. 1. Provide the Statement of Revenues for Fund 21000 for SY 16-17. This should include all revenues that accrued to the food service fund, including USDA reimbursements, student sales, and adult meal sales. 2. Provide the Balance Sheet for Fund 21000 as of June 30, 2016. This should include all asset, liability, and equity accounts for Fund 21000. 3. If the SFA's ending fund balance exceeded the three month average expenses, the SFA must 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.



reimbursement or until the resolution of an audit

Finding #14: Resource Management

The SFA incorrectly completed the Paid Lunch Equity Tool, therefore the tool did not determine compliance with paid lunch equity requirements.

Technical Assistance

During the review, it was determined that the SFA did not correctly calculate the weighted average paid lunch requirement price (most commonly calculated using the Paid Lunch Equity Tool) in order to determine compliance with paid lunch equity requirements. The SFA's submitted tool was incomplete and contained significant errors. They did not fill out the Unrounded Requirement Finder tab, and their October 2016 paid lunch prices on the Price Calculator tab do not match the prices reported to PED. The SFA should properly train staff on how to complete the Paid Lunch Equity Tool, in order to correctly determine if a paid lunch price increase is necessary. Further technical assistance was provided during the review, including the reviewer sending a corrected copy of the PLE Tool to the SFA.

Finding #15: Resource Management

The SFA did not charge enough for paid lunches, or did not transfer enough non-federal funds into the food service account to make up for a paid lunch price deficiency.

Technical Assistance

The SFA did not increase paid lunch prices as required by paid lunch equity requirements (calculated using the Paid Lunch Equity Tool), and did not transfer sufficient

will ensure compliance.

non-federal funds into the food service account to make up for this paid lunch price deficiency. The SFA's revised PLE tool showed a weighted average price requirement of \$2.48 for the SY 17-18, but the SFA's current weighted average price is only \$2.38. The SFA should have increased prices by \$.10. The SFA should ensure the Paid Lunch Equity Tool is completed annually, and if the tool shows a paid lunch price increase is necessary, the SFA must raise the weighted average paid lunch price as required (no more than \$.10 per year is required). If the SFA chooses to not raise paid lunch prices as required, they must complete the NonFederal Calculator tab of the Paid Lunch Equity Tool to determine how much non-federal funds is required to make up for the price deficiency. Appropriate non-federal fund sources include state funding received for student lunches and breakfasts, general funds, and funds provided by community organizations. Nonprogram food sales cannot be used to offset the cost of paid lunches.

For detailed regulation see:						
Required SFA Response	SFA Response	CNR Inte	rnal Use Intls.			
1. Provide documentation showing that paid lunch prices have been increased as necessary, or that sufficient nonfederal funds have been transferred into the food service account. If prices will not be increased until a later date (such as the beginning of the next semester), provide written assurance of the new paid lunch price(s) and the date that the new price(s) will be implemented.						
2. Explain the internal controls you have put in place to ensure paid lunch equity requirements are met in the future. This could include training on how to complete and interpret the Paid Lunch Equity Tool, improving communication between food service staff and school administrators, and having a written timeline for when the tool will be completed and paid lunch price decisions will be made.						

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:		Date:			
Signature of CN Resource Reviewer:	Debbíe Hawkins	Date:	October 25, 2017		

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





Required Corrective Actions- Review Areas



CN Resource P.O. Box 31060 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

