



New Mexico Public Education Department
Student Success & Wellness Bureau
Administrative Review Corrective Action Plan

Name of School Food Authority: **La Academia Dolores Huerta**
School Site(s) reviewed: La Academia Dolores Huerta

Date of On-Site Review: **October 16, 2017**

Date Corrective Action Plan Was provided to SFA: **November 9, 2017**

Date your Corrective Action Plan Response is due to NMPED: December 10, 2017

COMMENDATIONS

PERFORMANCE STANDARD 1
CEP paperwork in order.

PERFORMANCE STANDARD 2
SFA had proper signage in food service area with regard to offer vs serve and what is considered a reimbursable meal.
The kitchen staff did a wonderful job serving the meals to the students.

GENERAL AREAS
SFA posted most recent food safety inspection reports posted in visible area.
Potable water was available during breakfast and lunch.

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
For Breakfast, meal count totals by category have not been combined or recorded correctly. This is a systemic error. School is always claiming 50 meals and no more than 50 meals, even when more kids come through the serving line.
Technical Assistance Provided
During the review, claiming was discussed with the SFA. Meal count totals by category have not been combined or recorded correctly. This is a non-systemic error. To be in compliance, the SFA must ensure that meal counts are being recorded accurately. Consolidating meal counts by category was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.
Regulation / Citation Summary
210.7(c)(1) Lunch count system. To ensure that the Claim for Reimbursement accurately reflects the number of lunches and meal supplements served to eligible children, the school food authority shall, at a minimum:(iii) Base Claims for Reimbursement on lunch counts, taken daily at the point of service, which correctly identify the number of free, reduced price and paid lunches served to eligible children; (iv) Correctly record, consolidate and report those lunch and supplement counts on the Claim for Reimbursement.
SFA Suggested Guidance for Compliance
To come into compliance with the requirements for counting and claiming, the SFA must provide the State Agency with an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. Additionally, SFA staff will need to complete the Meal Counting and Claiming training found in the School Nutrition Toolbox at http://www.schoolnutritiontoolbox.org/snt-v3/index.php .
SFA Response

Finding #2
On the day of review, the 6-8 lunch menu did not meet the 3/4 cup daily vegetable requirement. Vegetables were provided, however the minimum required portion size was not met by the vendor. (Cravings Catering Menu)
Technical Assistance Provided
During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/
Regulation / Citation Summary
210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: 6-8: 3/4 cup of vegetable.



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SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all portion sizes planned meet at least the minimum required amount for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the day of review with the corrections that were made to the menu to bring it into compliance moving forward.

SFA Response

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Finding #3

On-site monitoring was not completed for all or some of the sites within the SFA.

Technical Assistance Provided

During the review, the requirement for on-site monitoring was reviewed with the SFA. It was determined that the SFA did not complete on-site monitoring by the approved extension deadline. Since the SFA has multiple sites they are required to monitor the lunch counting and claiming system for each site in the SFA prior to February 1st of each year unless an extension was requested by the SFA and approved by the State Agency.

Regulation / Citation Summary

210.8(a)(1) On-site reviews. Every school year, each school food authority with more than one school shall perform no less than one on-site review of the lunch counting and claiming system employed by each school under its jurisdiction. The on-site review shall take place prior to February 1 of each school year. Further, if the review discloses problems with a school's meal counting and claiming procedures, the school food authority shall: ensure that the school implements corrective action; and, within 45 days of the review, conducts a follow-up on-site review to determine that the corrective action resolved the problems. Each on-site review shall ensure that the school's claim is based on the counting system authorized by the State agency under §210.7(c) of this part and that the counting system, as implemented, yields the actual number of reimbursable free, reduced price and paid lunches, respectively, served for each day of operation.

SFA Suggested Guidance for Compliance

As the corrective action response the SFA must complete the monitoring review for all sites within the SFA. Submit copies of the monitoring forms with the response. Please submit a process that will be put in place moving forward to ensure that all on-site reviews are completed prior to February 1st of each year. Please identify the name(s) and title(s) of the person(s) who will be responsible for completing on-site monitoring.

SFA Response

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Finding # 4
The SFA did not complete on-site monitoring by February 1st and an extension was not requested.
Technical Assistance Provided
During the review, the requirement for on-site monitoring was reviewed with the SFA. It was determined that the SFA is not completing on-site monitoring for all or some of the sites within the SFA. Since the SFA has multiple sites, they are required to monitor the lunch counting and claiming system for each site in the SFA prior to February 1st of each year. The SFA was provided with the link to the USDA memo that includes a sample monitoring form. If the SFA chooses to create their own monitoring form, at a minimum it must include all information that is on the USDA monitoring form. http://www.fns.usda.gov/sites/default/files/SP14-2011_os.pdf
Regulation / Citation Summary
210.8(a)(1) On-site reviews. Every school year, each school food authority with more than one school shall perform no less than one on-site review of the lunch counting and claiming system employed by each school under its jurisdiction. The on-site review shall take place prior to February 1 of each school year. Further, if the review discloses problems with a school's meal counting and claiming procedures, the school food authority shall: ensure that the school implements corrective action; and, within 45 days of the review, conducts a follow-up on-site review to determine that the corrective action resolved the problems. Each on-site review shall ensure that the school's claim is based on the counting system authorized by the State agency under §210.7(c) of this part and that the counting system, as implemented, yields the actual number of reimbursable free, reduced price and paid lunches, respectively, served for each day of operation.
SFA Suggested Guidance for Compliance
As the corrective action response the SFA must complete the monitoring review for all sites within the SFA. Submit copies of the monitoring forms with the response. Please submit a process that will be put in place moving forward to ensure that all on-site reviews are completed prior to February 1st of each year. Additionally, please submit a process that will be put in place should an extension need to be requested from the State Agency. Please identify the name(s) and title(s) of the person(s) who will be responsible for completing on-site monitoring.
SFA Response

Finding # 5
The SFA is not tracking training hours.
Technical Assistance Provided
During the on-site review, training requirements were discussed with the SFA. To be in compliance, the SFA must track the hours of training completed by all School Nutrition staff. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.
Regulation / Citation Summary
210.30(g) School food authority oversight. Each school year, the school food authority director must document compliance with the requirements of this section for all staff with responsibility for school nutrition programs, including directors, managers, and staff. Documentation must be adequate to establish, to the State's satisfaction during administrative reviews, that employees are meeting the minimum professional standards.



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SFA Suggested Guidance for Compliance

To come into compliance with the requirements for Professional Standards, the SFA must provide the State Agency with an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency, indicating how the SFA will ensure that training is now being tracked.

SFA Response

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Finding # 6

Storage violations were observed on-site at the vendor facility (Cravings). The vendor had food that was not dated upon delivery.

Technical Assistance Provided

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

Regulation / Citation Summary

210.13(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.

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

To come into compliance with this finding the vendor/SFA must submit an assurance that the vendor/SFA is aware of the requirements for food storage and holding within the food safety guidelines. The assurance must include: a statement that all food and chemicals will be kept separately; a statement that all food items will be dated with the delivery date as well as the date the product was opened; a statement that all food will be stored at least 6 inches off of the floor; and a statement that all storage areas including coolers, freezers and storage rooms will be kept within the allowable temperature ranges. The assurance should also include a statement that temperature logs will be maintained for all storage areas. Submit copies of completed temperature logs with the corrective action response.

SFA Response

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Finding # 7

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

Technical Assistance Provided

During the review, storage requirements were discussed with the SFA. The SFA must ensure that



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all food is dated once opened.

Regulation / Citation Summary

210.13(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.

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

To come into compliance with this finding the vendor/SFA must submit an assurance that the vendor/SFA is aware of the requirements for food storage and holding within the food safety guidelines. The assurance must include: a statement that all food and chemicals will be kept separately; a statement that all food items will be dated with the delivery date as well as the date the product was opened; a statement that all food will be stored at least 6 inches off of the floor; and a statement that all storage areas including coolers, freezers and storage rooms will be kept within the allowable temperature ranges. The assurance should also include a statement that temperature logs will be maintained for all storage areas. Submit copies of completed temperature logs with the corrective action response.

SFA Response

Finding # 8

The "And Justice for All" poster posted is outdated. Correct poster needs to be posted.

Technical Assistance Provided

During the review the requirement for the "And Justice for All" poster were discussed with the SFA. The poster must be on display in all serving/dining areas, the poster must be displayed in a location that is visible to students was discussed with the SFA, and the poster must be 11" wide x 17" high. (The State Office just ordered more posters, once received one will be delivered to you)

Regulation / Citation Summary

FNS Instruction 113-1 Section B Methods of Public Notification. Each State agency, local agency, or other subrecipient serving the public must take the actions below to inform the general public, potentially eligible populations, community leaders, grassroots organizations, and referral sources about FNS programs and applicable CR requirements. 1 Prominently display the USDA nondiscrimination poster "And Justice for All," or an FNS approved substitute, except in family day care homes. If a State agency elects to produce its own posters, either due to unavailability from USDA/FNS or State agency preference, the reproduction must be approximately the same size as the applicable "And Justice for All" poster (11" width and 17" height).

SFA Suggested Guidance for Compliance

To come into compliance with this requirement, the SFA must provide the State Agency with a statement that the correct "And Justice for All" poster has been posted in a visible location with the serving/dining area.

SFA Response



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Signature of
Reviewer:

Laura Henry

Date: November 9, 2017

Signature of
Nutritionist

Date: _____

Signature of
SFA

Representative:

Date: _____

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

Name of Reviewer: **Laura Henry, Staff Manager**
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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.