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:	Mariano Lake Community School
SFA Code/ ID Number:	617000
Administrative Review Conducted on:	Thursday, October 26, 2017
SFA Contact Name and Title:	Olsen Charley, Head Cook
CNR Reviewer:	Jamie Hawkins

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on October 26, 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,

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 P 000 271.0000 1 700 020.2207

Administrative Review Technical Assistance Summary

SFA Name:	Mariano Lake Community School
SFA Code/ID Number:	617000
Administrative Review Conducted on:	Thursday, October 26, 2017
SFA Contact Name and title:	Olsen Charley, Head Cook
CNR Reviewer:	Jamie Hawkins

Commendations & Suggestions

Great job serving all whole grain-rich products on the lunch menu, for the week of menu review.

The kitchen staff was friendly and a pleasure to work with.

The mural on the wall of the cafeteria was breathtaking.

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.

Local Wellness Policy - During the review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to be made available to the public. The easiest method would be to post the wellness policy on the SFAs website. They can also send it out in a newsletter.

Local Wellness Policy - During the on-site review, Local Wellness Policies were discussed with the SFA. 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 Wellness Policy - During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to allow certain parties - parents, students, representatives of the school food authority, teachers of physical education, school health professions, the school board, school administrators, and the general public - to participate in the development, implementation, periodic review, and update of the Local Wellness Policy.

Local Wellness Policy - During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to allow certain parties - parents, students, representatives of the school food authority, teachers of physical education, school health professions, the school board, school administrators, and the general public - to participate in the development, implementation, periodic review, and update of the Local Wellness Policy. The SFA must reach out to these parties to make them aware of their ability to participate.

Local 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.

Local 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 at least once every three years. The results of the assessment must be made available to the public.

Professional Standards - 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.



Professional Standards - During the 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.

Buy American- The SFA must maintain paperwork stating the pineapple and mandarin oranges are not available domestically from the manufacturer/vendor. This requirement was discussed with the SFA.

Food Safety- The SFA was informed that all boxes and containers may not be on the floors of the dry storage room, walk in refrigerators, or walk in freezers.



SFA Name:

Mariano Lake Community School

SFA ID Number:

617000

Week of Menu Review:

2.12(3) 22.23124 13. 1121.211			
1 Mariano Lake Comm. School	NSLP Grade Group: K-8	SBP Grade Group: K-8	□ N//
2 N/A	NSLP Grade Group:	SBP Grade Group:	□ N//
3 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	□ N//

Menu Review Findings: Lunch

Site 1:

9/11/17 - 9/15/17

- 1. For the week of menu review, the lunch menu did not meet the minimum daily vegetable requirement. Vegetables were offered daily, however the minimum required portion size was not met.
- 2. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the beans/legumes vegetable subgroup.

Site(s) Selected for Review:

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** 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.

Menu Review Findings: Breakfast

- 1. For the week of menu review, not all grains offered at breakfast were whole grain-rich. This contributed to not meeting the following requirements: daily grain and whole grain-rich.
- 2. For the week of menu review, the breakfast menu did not meet the minimum daily fruit requirement. Fruit was offered daily, however the minimum required portion size was not met.

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 CNR Internal **Required Criteria for Response to Findings SFA Response** 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. 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.





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

SFA Name:	Mariano Lake Community School	Administrative Review Conducted	: Thursday, October	26, 202	17
SFA Code/ID: 617000		Site(s) Selected for Review: Mariano Lake Comm. School			
		N/A			
			N/A		
Data Carractive Astic	n Dian was provided to CEA.	Due Date for Corrective	Astion Dlan.		
Date Corrective Actio	n Plan was provided to SFA:	Due Date for Corrective	e Action Plan:		
The following pa		d during the Administrative Review. There is an area fo led response for each in the spaces provided.	r a response for each findi	ing.	
		inding #1: Civil Rights			
The SFA is using the incorrect of	civil rights statement. They are using an outd				
		Technical Assistance			
Program material.	nent for the civil rights statement to appear	on all Program material was discussed with the SFA. Th	ne SFA must use the stater	nent or	n all
	For detailed regulation see: FNS In	nstruction 113-1 IX A 3 Nondiscrimination Statement.			
Require	ed SFA Response	SFA Response		CNR Inte Appv.	rnal Use Intls.
1. Provide the date that the fir the planned date of completio	nding was brought into compliance or n.			- / /	
2. Provide the name(s) and titl	e(s) of the SFA representative(s) that				
will ensure compliance.					
3. Provide a written statement	that the non-discrimination statement				
has been added to all nutritior	program materials.				
4. Provide an example to show	that the non-discrimination statement				
has been added. Ex: any letter	to the household.				

Finding #2: Civil Rights

The SFA public release did not contain the correct non-discrimination statement.

Technical Assistance

During the review the requirement for the most current civil rights statement to appear on all Program material was discussed with the SFA. The SFA must use the most

current statement on all Program material. Per USDA requirements the new Non-discrimination statement must be on all program materials no later than September 30, 2016. The SFA was provided with the USDA link to the new non-discrimination statement. http://www.fns.usda.gov/fns-nondiscrimination-statement

For detailed regulation see: §245.5(a)(1) Public Release			
Required SFA Response	SFA Response	CNR Internal U	
Provide the date that the finding was brought into compliance or the planned date of completion.		Appv.	Intls.
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.			

Finding #3: Civil Rights

The SFA does not have a procedure in place for handling civil rights complaints

Technical Assistance

During the review the requirement for the SFA to have a complaint procedure was discussed. The procedure must indicate: that any person or representative alleging discrimination based on a prohibited basis has the right to file a complaint; all complaints, written or verbal, must be forwarded to the appropriate Regional or FNS OCR Director, unless an approved State complaint procedure is in place; in the event a complainant makes the allegations verbally or in person and refuses or is not inclined to place such allegations in writing, the person to whom the allegations are made must write up the elements of the complaint for the complainant. The procedure must also identify the outside agency to which the complaints are forwarded.

For detailed regulation see: FNS Instruction 113-1 Section XV Complaint Procedures				
Required SFA Response SFA Response			CNR Internal Use	
Required 5177 Nesponse	STATICSPOTISC	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 procedure for how the SFA will handle any alleged				
civil rights complaints.				

Finding #4: Local Wellness Policy

The SFAs Local Wellness Policy does not contain all of 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 regulation 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 #5: Civil Rights

The SFA did not provide the yearly civil rights training for the appropriate staff.

Technical Assistance

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.

Findin	g #6:	Civil	Rights
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The SFA has not collected racial/ethnic data on an annual basis.

Technical Assistance

During the review the requirement to collected 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	For detailed regulation see: FNS Instruction 113-1 Appendix B Section F				
Required SFA Response	SFA Response	CNR Internal Us			
Required 51 A Response	31 A Nesponse	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 copy of the completed racial/ethnic data collection sheet.					
4. Provide a statement of assurance that this information will be			_		
collected annually.					

Finding #7: Professional Standards

The School Nutrition Program Manager 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, annual training hour requirements were discussed with the SFA. To be in compliance, the SFA must ensure that the School Nutrition Program Director completes the required amount of training annually. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

Finding #8: 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	ı see:
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Required SEA Response

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Required Corrective Actions- Review Areas			
Nequileu 31 A Nesponse	or viceshouse	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 #9: Meal Counting and Claiming

The SFA has claimed meals in error based on inaccurate counting and/or claiming procedures. The counts by category were not correctly used in the claim for reimbursement.

Technical Assistance

During the review, counting and claiming were discussed with the SFA. The SFA has claimed meals in error based on inaccurate counting and/or claiming procedures. The counts by category were not correctly used in the claim for reimbursement. To be in compliance, the SFA must ensure that meal counts are being recorded accurately and that claims are being filed correctly. Proper counting and claiming procedures were reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.

For detailed regulation see: 210.7(c) Reimbursement limitations.

Required SFA Response	SFA Response	CNR Internal Use			
Required of A Response		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 detailed explanation of the new/revised process that will					
be implemented at the point of service to ensure an accurate					
counting and claiming system.					

Finding #10: Food Safety

The SFA did not request two health inspections for each school year.

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.

letailed		

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



Finding #11: Resource Management

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

Technical Assistance

The SFA provided adult meal counts showing the adult meals served for March 2016, but did not 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).

For detailed regulation see: 210.14(f) Revenue from nonprogram foods.			
Required SFA Response	SFA Response		ernal Use
1. Provide a revenue report showing the March 2016 adult meal sales were deposited to the food service account.		Appv.	Intls.

Finding #12: Resource Management

The SFA offers visitor meals for free.

Technical Assistance

The SFA is offering meals for free to family members that come once a month to eat with their students. Only food service employees may eat for free at the cost of the food service program. Any other staff members, visitors, or "lunch duty" staff must pay for the full cost of their meal, as outlined in FNS Instruction 782-5. It is suggested that the SFA starts to charge the visitors the full price of their meal. 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 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).

For detailed regulation and 210 14(f) Revenue from nonnegative foods

For detailed regulation see: 210.14(j) kevenue from nonprogram foods.				
Required SFA Response	SFA Response		CNR Internal Use	
	SI A Nesponse	Appv.	Intls.	



Finding #13: Resource Management

The SFA did not reimburse the food service account for meals provided to the FACE program.

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.



Finding #14:

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 167A2100DD.

The SFA did not know the total revenues and total expenditures for the food service program. This is a repeat finding from the previous 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/).

| CNR Internal Use | Countries | Countries



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







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 CN Resource NUTRITION PROGRAMS SIMPLIFIED



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

<u>School Breakfast and Summer Food Service Program Outreach:</u>

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

