



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

SFA Name: _____ Ojo Encino Day School _____
 Administrative Review Conducted on: _____ 11/16/2016 _____
 Sites Selected for Review: _____ Ojo Encino Day School _____

Date Corrective Action Plan was provided to SFA: _____

Due Date for Corrective Action Plan: _____ 23-Mar-17 _____

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	A summary of the regulation / requirement
The Code of Federal Regulations citation number or alternate resource citation	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 spaces provided.

Finding #1
314. The SFA was not following their State Agency approved application. Instead of using a manual POS system as outlined in their application they used tray counts for most of the review month. As of the last week of October, they switched to the proper manual POS and on the day of review (November 16) it was being completed accurately and in accordance with their application.
Technical Assistance Provided
During the review, the State Agency approved application was discussed with the SFA. The SFA is not following their State Agency approved application. To be in compliance, the SFA must ensure that it is following the State Agency approved application. The SFA must contact the State Agency to get approval for any changes in the program since the last application was approved. The SFA acknowledged the finding and has already implement needed changes.
Regulation / Citation and Summary

210.7(a) General. Reimbursement payments to finance nonprofit school food service operations shall be made only to school food authorities operating under a written agreement with the State Agency.

SFA Suggested Guidance for Compliance

The SFA has already completed the necessary POS changes to be in compliance with their application. 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. Please submit the assurance and plan to the State Agency. The plan must include: an indication that the SFA is now following the State Agency approved application, a description of the process that has been implemented, a description of the training that was provided to staff to inform them of the process, the date the training was completed and the name and title of the SFA representative that will ensure compliance moving forward. 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

1219. 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. SYSCO has a form for tracking training that can be provided at no cost since Ojo Encino is a customer.

Regulation / Citation and 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.

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 #3
1400. The SFA does not have a food safety plan.
Technical Assistance Provided
During the review, the food safety plan was discussed with the SFA. The SFA must have a complete food safety plan that includes all of the required sections as specified by USDA. The SFA must have a food safety plan available at each site so that food service staff may stay in compliance with food safety requirements and procedures.
Regulation / Citation and Summary
210.13(c) Food safety program. The school food authority must develop a written food safety program that covers any facility or part of a facility where food is stored, prepared, or served. The food safety program must meet the requirements in paragraph (c)(1) or paragraph (c)(2) of this section, and the requirements in §210.15(b)(5). (1) A school food authority with a food safety program based on traditional hazard analysis and critical control point (HACCP) principles must: (i) Perform a hazard analysis; (ii) Decide on critical control points; (iii) Determine the critical limits; (iv) Establish procedures to monitor critical control points; (v) Establish corrective actions; (vi) Establish verification procedures; and (vii) Establish a recordkeeping system. (2) A school food authority with a food safety program based on the process approach to HACCP must ensure that its program includes: (i) Standard operating procedures to provide a food safety foundation; (ii) Menu items grouped according to process categories; (iii) Critical control points and critical limits; (iv) Monitoring procedures; (v) Corrective action procedures; (vi) Recordkeeping procedures; and (vii) Periodic program review and revision.
SFA Suggested Guidance for Compliance
To come into compliance with the requirements for food safety, the SFA must provide the State Agency with an assurance that the appropriate staff understand the requirements for a food safety plan. The assurance should include; a statement that the food safety plan will contain all required fields, that the food safety plan will be available at each site within the SFA, and that training will be completed for all appropriate SFA staff. In addition to the assurance an electronic copy of the food safety plan must be submitted for review.
SFA Response

Finding #4
1407. Temperature logs are not being maintained for all food storage areas.
Technical Assistance Provided

During the on-site review, temperature logs were discussed with the SFA. The SFA must maintain temperature logs for all food storage areas, in accordance with the requirements of the local health department. The completed temperature logs must be kept on file for a minimum of 6 months.

Regulation / Citation and Summary

210.15(b)(5) The SFA must maintain records from the food safety program for a period of six months following a month's temperature records to demonstrate compliance with §210.13(c), and records from the most recent food safety inspection to demonstrate compliance with §210.13(b).

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for food safety, the SFA must provide the State Agency with an assurance that the appropriate staff understand the requirements for food safety documentation. The assurance should include; a statement that the food safety plan will be implemented at each site, a statement that proper documentation practices will be established at each site, a statement that all temperature documents will be maintained for a minimum of 6 months, and that training will be completed for all appropriate SFA staff. Provide the agenda and sign-in sheets from the trainings.

SFA Response

Finding #5

700. The SFA was unable to show they have a separate financial account for the nonprofit school food service program.

Technical Assistance Provided

The SFA was unable to provide the financial documents needed to complete the resource management comprehensive review, including a Statement of Revenues & Expenditures and the detailed general ledger from the month selected for Allowable Cost testing. The SFA should set up a system in-house to track the financial transactions for the food service program. This should include a record of all revenues accrued to the food service account (USDA reimbursements and adult meal sales) and all expenditures purchased using the food service funds. The Institute of Child Nutrition has some helpful, free resources about financial management for a food service program. Their "Financial Management: A Course for School Food Service Directors" can be found at <http://www.nfsmi.org/> under School Nutrition Programs.

Regulation / Citation and Summary

7 CFR 210.19 Additional responsibilities. (a) General Program Management (1) Assurance of compliance for finances. Each State agency shall ensure that school food authorities comply with the requirements to account for all revenues and expenditures of their nonprofit school food service. School food authorities shall meet the requirements for the allowability of nonprofit school food service expenditures in accordance with this part and, 7 CFR part 3015 and 7 CFR part 3016, or 7 CFR part 3019, as applicable.

SFA Suggested Guidance for Compliance

To come into compliance with the nonprofit school food service program requirements, the SFA must submit documentation that demonstrates a separate account has been established for the food service account. Documentation should include a report from the general ledger showing the food service revenue and expenditure accounts. If the SFA does not use accounting software to maintain a general ledger, they must show how they are tracking all food service receipts and disbursements.

SFA Response

Finding #6

Resource Management Comprehensive Review: NonProgram Food Compliance
The SFA did not complete the USDA Nonprogram Food Revenue Tool.

Technical Assistance Provided

The SFA did not complete the NonProgram Food Revenue Tool. The NonProgram Food Revenue Tool should be completed every year to determine compliance with nonprogram food revenue requirements. 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 correctly each year. This should include a timeframe for when the tool will be completed, and proper training for the person responsible for completing the tool.

SFA Response

Finding #7
810. The SFA must use the current civil rights statement on all Program materials. The SFA is not using the civil rights statement on all Program materials.
Technical Assistance Provided
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
Regulation / Citation and Summary
FNS Instruction 113-1 IX A 3 Nondiscrimination Statement. All information materials and sources, including Web sites, used by FNS, State agencies, local agencies, or other subrecipients to inform the public about FNS programs must contain a nondiscrimination statement. It is not required that the nondiscrimination statement be included on every page of the program information Web site. At the minimum, the nondiscrimination statement, or a link to it, must be included on the homepage of the program information.
SFA Suggested Guidance for Compliance
To come into compliance with civil rights requirements, the SFA must submit an assurance to the State Agency that the current non-discrimination statement has been added to all program materials. In addition, the SFA must submit a sample of program materials, such as a menu or letter to households with the statement added to the State Agency.
SFA Response

Finding #8
404. 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

Finding #9

1408. Storage violations were observed on-site. The SFA had food that was not dated upon delivery.

Technical Assistance Provided

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

Regulation / Citation and 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 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 SFA must submit an assurance that the 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

Signature of Reviewer: _____

Date: _____

Signature of SFA Representative: Rich Crandall

Date: 11/16/2016

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



Coordinated School Health & Wellness Bureau

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Please insert your detailed responses, save, print, sign, and scan/email or mail the signed copy to your NMPEI address above by the due date indicated. Thank you.

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