



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

SFA Name: Portales Municipal Schools

Administrative Review Conducted on: 4/25-26/2017

Site(s) Selected for Review: Portales Jr. High
James Elementary School

Date Corrective Action Plan was provided to SFA: 5/15/2017

Due Date for Corrective Action Plan: 6/14/2017

The following pages address the findings that were identified during your Administrative Review. For each finding you will be presented with the following:

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

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

Finding #1
410. For the week of menu review, the K-5 lunch menu did not meet the minimum daily requirement of 3/4 cup vegetable. Vegetables were provided, however the minimum required portion size was not met on Monday, Tuesday, and Thursday. Only 1/2 cup of vegetables were offered on these 3 days.
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 and Summary

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: K-5: 3/4 cup of vegetable.

SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide 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 week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide the following documentation to support the changes: updated production records showing and menu that at least 3/4 cup of creditable vegetables will be offered daily.

SFA Response

Finding #2

410. For the week of menu review, the K-5 lunch menu did not meet the minimum weekly requirement of 1/2 cup dark green vegetable subgroup. Only 1/4 cup of creditable dark green vegetables were served this week.

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. This includes meeting the weekly requirements for the vegetables sub-groups. Over the course of the standard school week the SFA must at a minimum meet the required servings for each sub-group. Keep in mind that leafy green vegetables are creditable at half volume. The SFA should review all menus to ensure that at least the minimum serving for each sub-group 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 and Summary

210.10(c)(iii) Vegetables component. Vegetable offerings at lunch over the course of the week must

include the vegetable subgroups, as defined in this section in the quantities specified in the meal pattern in paragraph (c) of this section: K-12: 1/2 cup creditable dark green.

SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide 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 weekly requirements for vegetable subgroups are met 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 week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide the following documentation to support the changes: updated production records and menus to show that at least 1/4 cup of creditable dark green vegetable were added to the menu this week, to total 1/2 cup for the week.

SFA Response

Finding #3

410. For the week of menu review, the K-5 lunch menu did not meet the minimum daily requirement of 1 ounce equivalent grain. A grain was provided, however the tortilla served on Tuesday and Friday was not whole grain rich.

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 and Summary

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: K-5: 1 oz. equivalent daily grain.

SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide 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 week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide the following documentation to support the changes: updated production records showing that at least 1 oz. equivalent of creditable grains will be offered daily. Please provide pertaining nutrition facts labels for any added products.

SFA Response

Finding #4

410. For the week of menu review, the K-5 lunch menu did not meet the minimum weekly requirement of 8 ounce equivalent grain.

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 meet the weekly requirements as well as the daily requirements for grains required for the specific grade group. The SFA should review all menus to ensure that at least the minimum daily and weekly requirement 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 how to determine the total number of weekly servings if there are multiple menu items each day. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. <http://healthymeals.nal.usda.gov/>

Regulation / Citation and Summary

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: K-5: minimum of 8 oz. equivalent of grains per week.

SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must 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 weekly requirements for grains are met 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 week of review with the corrections that were made to the menu to bring it into compliance moving forward. Submit documentation as described under finding #3 to demonstrate compliance to this finding as well.

SFA Response

Finding #5
410. For the week of menu review, the K-5 lunch menu did not meet the 100% Whole Grain Rich requirement for grains. Not all grains provided were Whole Grain Rich. The tortilla served on Tuesday and Friday was not Whole Grain Rich.
Technical Assistance Provided
During the review requirements for the meal pattern were reviewed with the SFA. All grains provided as part of the reimbursable meal must be Whole Grain Rich. To be considered Whole Grain Rich the item it must be comprised of at least 50% whole grain ingredients. An easy way to determine if a pre-purchased item is whole grain is to look at the ingredient list. If the first ingredient is whole grain, it is a Whole Grain Rich product. If the first ingredient is water, but the second is a whole grain it is also a Whole Grain Rich product. If the SFA is using a recipe as long as the whole grain ingredient is the largest by weight of all of the grain ingredients combined it is a Whole Grain Rich product. For additional information on whole grains visit the USDA FNS website. http://healthymeals.nal.usda.gov/menu-planning/whole-grains
Regulation / Citation and Summary
220.8(c)(2)(iv) Grains component. (A) Enriched and whole grains. All grains must be made with enriched and whole grain meal or flour, in accordance with the most recent FNS guidance on grains. Whole grain-rich products must contain at least 50 percent whole grains and the remaining grains in the product must be enriched.
SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance with the Whole Grain Rich requirements. The plan should include; a statement that only Whole Grain Rich grain products will be used as part of the reimbursable meal, a statement that all labels/recipes/manufacturer statements will be kept on file to document the Whole Grain Rich compliance, and a statement that additional menu training will be provided to SFA staff. Provide the outline for the training and the dates that the training(s) will be completed. In the plan include the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. In addition to the plan please submit a revised menu from the week of review that clearly identifies the products that have been changed to bring the menu into compliance, submit any needed supporting documentation such as labels, recipes, and/or manufacturer statements.

SFA Response

Finding #6

410. For the week of menu review, the 6-8 breakfast menu did not meet the minimum daily requirement of 1 ounce equivalent grain. A grain was provided, however the minimum required portion size was not met on Tuesday.

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 and Summary

220.8(c) Meal pattern for school breakfasts. A school must offer the food components and quantities required in the breakfast meal pattern established. K-12: 1 oz. equivalent of grains daily.

SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide 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 week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide the following documentation to support the changes: updated production records to show that at least 1 oz. equivalent of grain will be offered with each meal choice.

SFA Response

Finding #7

410. For the week of menu review, the 6-8 lunch menu did not meet the minimum weekly requirement of 9 ounce equivalent meat/meat alternate. The Chef Salad, which was offered daily, credited at 1.75 oz. equivalent meat/meat alternate. This meal choice resulted in a weekly meat/meat alternate shortage.

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 meet the weekly requirements for meat/meat alternates required for the specific grade group. The SFA should review all menus to ensure that at least the minimum daily and weekly requirement 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 how to determine the total number of weekly servings if there are multiple menu items each day. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. <http://healthymeals.nal.usda.gov/>

Regulation / Citation and 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: minimum of 9 oz. equivalent of meat/meat alternate per week.

SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide 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 weekly requirements for meat/meat alternates are met 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 week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

SFA Response

Finding #8

410. For the week of menu review, the 6-8 lunch menu did not meet the minimum daily requirement of 1 ounce equivalent grain. A grain was provided, however the tortilla served on Tuesday and Friday was not Whole Grain Rich.

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 and 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: 1 oz. equivalent daily grain.

SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide 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 week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide the following documentation to support the changes: updated production records showing that at least 1 oz. equivalent of creditable grains will be offered daily. Please provide pertaining nutrition facts labels for any added products.

SFA Response

Finding #9

410. For the week of menu review, the 6-8 lunch menu did not meet the minimum weekly requirement of 8 ounce equivalent grain.

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 meet the weekly requirements as well as the daily requirements for grains required for the specific grade group. The SFA should review all menus to ensure that at least the minimum daily and weekly requirement 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 how to determine the total number of weekly servings if there are multiple menu items each day. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. <http://healthymeals.nal.usda.gov/>

Regulation / Citation and 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: minimum of 8 oz. equivalent of grains per week.

SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide 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 weekly requirements for grains are met 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 week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

SFA Response

Finding #10

410. For the week of menu review, the 6-8 lunch menu did not meet the 100% Whole Grain Rich requirement for grains. Not all grains provided were Whole Grain Rich. The tortilla served on Tuesday and Friday was not Whole Grain Rich.

Technical Assistance Provided

During the review requirements for the meal pattern were reviewed with the SFA. All grains provided as part of the reimbursable meal must be Whole Grain Rich. To be considered Whole Grain Rich the item it must be comprised of at least 50% whole grain ingredients. An easy way to determine if a pre-purchased item is whole grain is to look at the ingredient list. If the first ingredient is whole grain, it is a Whole Grain Rich product. If the first ingredient is water, but the second is a whole grain it is also a Whole Grain Rich product. If the SFA is using a recipe as long as the whole grain ingredient is the largest by weight of all of the grain ingredients combined it is a Whole Grain Rich product. For additional information on whole grains visit the USDA FNS website. <http://healthymeals.nal.usda.gov/menu-planning/whole-grains>

Regulation / Citation and Summary

210.10(c)(2)(iv) Grains component. (A) Enriched and whole grains. All grains must be made with enriched and whole grain meal or flour, in accordance with the most recent grains FNS guidance. Whole grain-rich products must contain at least 50 percent whole grains and the remaining grains in the product must be enriched.

SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance with the Whole Grain Rich requirements. The plan should include; a statement that only Whole Grain Rich grain products will be used as part of the reimbursable meal, a statement that all labels/recipes/manufacturer statements will be kept on file to document the Whole Grain Rich compliance, and a statement that additional menu training will be provided to SFA staff. Provide the outline for the training and the dates that the training(s) will be completed. In the plan include the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. In addition to the plan please submit a revised menu from the week of review that clearly identifies the products that have been changed to bring the menu into compliance, submit any needed supporting documentation such as labels, recipes, and/or manufacturer statements.

SFA Response

Finding #11

704. The SFA had an excess of three months' average expenditures in its year-end net cash resources.

Technical Assistance Provided

Three-month average expenses were \$421,686 (total expenditures of \$1,265,058 divided by 9 months, multiplied by 3 months), and the ending net cash resources were \$708,618, resulting in an excess balance of \$286,932.

Regulation / Citation and Summary

7 CFR 210.14 (b)
 Net cash resources. The school food authority shall limit its net cash resources to an amount that does not exceed 3 months' average expenditures for its nonprofit school food service or such other amount as may be approved by the State agency in accordance with §210.19(a).

SFA Suggested Guidance for Compliance

As the corrective action response, please explain how you will lower the nonprofit school food service net cash resource balance to a level at or below 3 months' average expenditures. Additionally, explain the internal controls that have been put into place to ensure that the food service net cash resource balance will remain under 3-months' average expenses or prior approval will be received from the State Agency if an excess balance is expected.

SFA Response

Finding #12

710. The SFA is not charging enough for paid lunches and did not provide evidence that nonfederal funds were used to supplement paid lunch prices. Additionally, the SFA incorrectly completed the Paid Lunch Equity Tool.

Technical Assistance Provided

The SFA was required to raise paid lunch prices by \$.10 in both the review year and the current year. The SFA had errors on the Paid Lunch Equity Tools, which caused them to incorrectly evaluate the need to raise paid lunch prices. The SFA did not complete "Step 1" of the PLE Tool, where the weighted average price requirement is calculated. The reviewer corrected the tool, and determined that the SFA was required to charge at least \$1.60, but is only charging \$1.50. The SFA must either raise paid lunch prices as required by the tool, or use sufficient nonfederal funds to supplement the paid lunch price. Nonfederal fund requirements can be calculated on the "Nonfederal Calculator" tab of the PLE Tool and could include state and local funding (including general funds) transferred into the food service fund to support paid lunches. The SFA must be able to document this support with a fund transfer into the food service account.

Regulation / Citation and Summary

7 CFR 210.14 Resource management. (e) Pricing paid lunches. (3) Average lunch price is lower than the reimbursement difference. When the average price from the prior school year is lower than the difference in reimbursement rates as determined in paragraph (e)(1)(iii) of this section, the school food authority shall establish an average price for the current school year that is not less than the average price charged in the previous school year as adjusted by a percentage equal to the sum obtained by adding: (i) 2 percent; and (ii) The percentage change in the Consumers Price Index for All Urban Consumers used to increase the Federal reimbursement rate under section 11 of the Act for the most recent school year for which data are available. The percentage to be used is found in the annual notice published in the Federal Register announcing the national average payment rates, from the prior year. (4) Price Adjustments. (i) Maximum required price increase. The maximum annual average price increase required under this paragraph shall not exceed ten cents. (ii) Rounding of paid lunch prices. Any school food authority may round the adjusted price of the paid lunches down to the nearest five cents. (iii) Optional price increases. A school food authority may increase the average price by more than ten cents. (5) Reduction in average price for paid lunches. (i) Any school food authority may reduce the average price of paid lunches as established under this paragraph if the State agency ensures that funds are added to the nonprofit school food service account in accordance with this paragraph. The minimum that must be added is the product of: (A) The number of paid lunches claimed by the school food authority in the previous school year multiplied by (B) The amount required under paragraph (e)(3) of this section, as adjusted under paragraph (e)(4) of this section, minus the average price charged.

SFA Suggested Guidance for Compliance

As the corrective action response, explain your plan for raising paid lunch prices or designating nonfederal funds for paid lunch support. Additionally, explain the process that will be put into place to ensure that the Paid Lunch Equity Tool will be correctly evaluated before each school year to ensure the minimum required paid lunch price is charged or sufficient non-federal funding will be transferred to the food service account to support paid lunch prices. Identify by position title the person who will be responsible for ensuring paid lunch equity requirements are met.

SFA Response
Finding #13
Resource Management Comprehensive Review – NonProgram Food Revenue The SFA incorrectly completed the NonProgram Food Revenue Tool.
Technical Assistance Provided
The SFA did not correctly calculate total nonprogram and program food costs. The SFA took total food costs for the year and divided by the number of meals served, without considering the different costs to produce breakfasts and lunches. They also did not include extra milks and extra entrees as nonprogram foods. The SFA should follow the newest USDA guidelines for nonprogram food revenue requirements, which the reviewer sent to the Director of Student Nutrition in an email. This included a suggestion to complete the tool for a one-week timeframe rather than the entire year, and detailed instructions on how to calculate food cost using menu costing analysis. The Nonprogram Food Revenue Tool must be completed annually, and should include adult meals, extra milks, extra entrees, other a la carte, and vended meals as the nonprogram foods.
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, submit a corrected copy of the USDA Non-Program Food Revenue Tool, along with the backup documentation and calculations used to complete the tool. If the tool shows you are out of compliance, include the steps you have taken to raise non-program food prices as necessary. The tool can be completed for at least a 5-day reference period during the current school year, and should include adult meals, extra entrees, extra milks, and vended meals as non-program foods.

Additionally, explain the process that will be put into place to ensure that the USDA Nonprogram Food Revenue Tool is completed each year. This should include a timeframe for when the tool will be completed, the name by position of the person responsible for completing the tool, and the steps that will be taken if the tool shows you are out of compliance.

SFA Response

Finding #14

108. The hearing official is the same SFA representative that made the original eligibility determination.

Technical Assistance Provided

During the review, hearing official requirements were discussed with the SFA. The hearing official must be a different individual from the one who made the original eligibility determination. The SFA must ensure that all documents and public releases mentioning the hearing official are updated.

Regulation / Citation and Summary

245.7(a)(2)(vii) That the hearing shall be conducted and the decision made by a hearing official who did not participate in making the decision under appeal or in any previously held conference

SFA Suggested Guidance for Compliance

To come into compliance with the hearing official requirements, the SFA must designate another individual as the hearing official. Submit the name and title of the Hearing official. In addition please submit the names and titles of the staff that will serve as the Determining, Confirming and Verifying Official.

SFA Response

Finding #15

134. The SFA did not perform Direct Certification matches according to the required timeframes.

Technical Assistance Provided

<p>During the review, Direct Certification matches were discussed with the SFA. The SFA must perform at least 3 Direct Certification matches according to the timeframes established by the State Agency. The SFA may elect to complete additional direct certification matches however at a minimum they must complete 3 match within the set timeframe.</p>
<p>Regulation / Citation and Summary</p>
<p>245.6(b)(3) Frequency of direct certification contacts with SNAP. (ii) (A) Beginning in School Year 2011-2012, at a minimum, all local educational agencies must conduct direct certification as follows: (1) At or around the beginning of the school year; (2) Three months after the initial effort; and (3) Six months after the initial effort.</p>
<p>SFA Suggested Guidance for Compliance</p>
<p>To come into compliance with the requirements for Direct Certification matching, the SFA must provide an assurance that staff administering the free and reduced lunch program understand these requirements, and that the SFA will complete the Direct Certification matches at least 3 times a year at the state prescribed timeframes.</p>
<p>SFA Response</p>

<p>Finding #16</p>
<p>202. The SFA does not have an individual designated as the confirming official.</p>
<p>Technical Assistance Provided</p>
<p>During the review the SFA was informed that the confirming official may not also be the determining official. The SFA should review the current Income Eligibility Manual for additional verification requirements. The SFA was also reminded that the hearing official may not be the determining, confirming, nor the verifying official.</p>
<p>Regulation / Citation and Summary</p>
<p>CFR 245.6a(e)(1)(i) Confirmation of a household's initial eligibility. Prior to conducting any other verification activity, an individual, other than the individual who made the initial eligibility determination, shall review for accuracy each approved application selected for verification to ensure that the initial determination was correct. If the initial determination was correct, the local educational agency shall verify the approved application.</p>
<p>SFA Suggested Guidance for Compliance</p>
<p>To bring this area into compliance the SFA must provide an assurance that the staff understands this requirement. The SFA must submit the person(s) by position(s) who will be the determining official for all applications, the confirming official for verification, and the verifying official.</p>
<p>SFA Response</p>

Finding #17
800. The SFA is using the incorrect civil rights statement. They are using an outdated version of the statement. The correct statement is not on all program materials. This is a repeat finding.
Technical Assistance Provided
During the review the requirement for the civil rights statement to appear on all Program material was discussed with the SFA. The SFA must use the statement on all Program material.
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 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.
SFA Response

Finding #18
1601. The SFA has not performed SFSP outreach.
Technical Assistance Provided
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
Regulation / Citation and Summary
210.12(d)(2) School food authorities must cooperate with Summer Food Service Program sponsors to distribute materials to inform families of the availability and location of free Summer Food Service Program meals for students when school is not in session.

SFA Suggested Guidance for Compliance
To come into compliance with this requirement, the SFA must submit an assurance to the State Agency that the SFA will cooperate with Summer Food Service Program sponsors to conduct outreach on the availability of the Summer Food Service Program. Additionally, please state the name and position of the person who will oversee compliance in this area.
SFA Response

Finding #19
501. The cafeteria staff has not been trained on Offer versus Serve.
Technical Assistance Provided
If the SFA is going to implement Offer vs. Serve, they should annually train their staff and train new staff as needed. On going training should be provided depending on needs to staff in order to be in compliance with Offer vs. Serve procedures. It was determined during the review that the SFA is not offering training on Offer vs. Serve to the cafeteria staff. Offer vs. Serve training found in the School Nutrition Toolbox was discussed with the SFA and completing the training was recommended.
Regulation / Citation and Summary
Offer vs. Serve Guidance Manual (Page 4) Schools are expected to conduct training for cashiers and serving line staff so they can help students select the required food components/food items in the quantities needed for reimbursable lunches and breakfasts. Annual training is required to meet the professional standards requirements.
SFA Suggested Guidance for Compliance
To come into compliance with the requirements of Offer vs. Serve, the SFA must submit a written statement that training for all kitchen staff will be provided.. In addition the SFA must also provide the name and title of the SFA representative that will ensure compliance with this finding moving forward, an outline of the training that was provided to staff to inform them of the requirements and the date the training was completed.
SFA Response

Finding #20
110. The SFA does not have a Direct Certification letter. This is a repeat finding.
Technical Assistance Provided
During the review, the requirements of the Direct Certification letter were discussed with the SFA. The SFA must include the information in the letter as outlined in the Eligibility Manual for School Meals, Chapter 2.
Regulation / Citation and Summary
245.6(c)(6)(ii) Direct Certification. Households approved for benefits based on information provided by

the appropriate State or local agency responsible for the administration of the SNAP, FDPIR or TANF must be notified, in writing, that their children are eligible for free meals or free milk, that no application for free and reduced price school meals or free milk is required. The notice of eligibility must also inform the household that the parent or guardian must notify the local educational agency if they do not want their children to receive free benefits.

SFA Suggested Guidance for Compliance

To come into compliance with requirements for the Direct Certification letter, the SFA must provide an assurance that staff administering the free and reduced lunch program understand these requirements, and that the SFA will ensure that all letters moving forward will include all USDA required fields. Please submit the assurance and a copy of the updated Direct Certification letter.

SFA Response

Finding #21

128. The SFA annualized income when it should have been determined at its stated frequency.

Technical Assistance Provided

During the review, making determinations based on the stated frequency was discussed with the SFA. When determining eligibility, the SFA may not annualize income unless income sources are listed at different frequencies. If there are multiple income sources with more than one frequency, the LEA must annualize, that is, calculate all income as for an entire year, by multiplying: Weekly income by 52; or Bi-weekly income (received every two weeks) by 26; or Semi-monthly income (received twice a month) by 24; or Monthly income by 12.

Regulation / Citation and Summary

245.6(c)(4) Calculating income. The local educational agency must use the income information provided by the household on the application to calculate the household's total current income. Eligibility Manual, Chapter 3: If there is only one source of income, or if all sources are received in the same frequency, the LEA totals all sources and compares the total to the IEGs.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for determining applications, the SFA must provide written assurance that the SFA will determine applications based on the frequency of pay provided on the application when only one frequency is listed and that the SFA will use the correct conversions factors when multiple pay frequencies are provided to determine the annual income.

SFA Response

Finding #22

208. The SFA does not have documentation demonstrating that a confirmation review took place.

Technical Assistance Provided

During the review, documenting the confirmation review was discussed with the SFA. The SFA must conduct confirmation reviews and maintain documentation that these took place.

Regulation / Citation and Summary

245.6a(e) Activities prior to household notification—(1) Confirmation of a household's initial eligibility. (i) Prior to conducting any other verification activity, an individual, other than the individual who made the initial eligibility determination, shall review for accuracy each approved application selected for verification to ensure that the initial determination was correct. (ii) The requirements in paragraph (e)(1)(i) of this section are waived if the local educational agency is using a technology-based system that demonstrates a high level of accuracy in processing an initial eligibility determination based on the income eligibility guidelines for the National School Lunch Program.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for documenting confirmation reviews, the SFA must provide an assurance that staff conducting verification understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance that includes the person(s) by position(s) who will be completing the confirmation reviews and plan.

SFA Response

Empty box for SFA Response.

Signature of Reviewer: *Savin Math* Date: 4/26/2017

Signature of SFA Representative: _____ Date: _____

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



Administrative Review Team
CN Resource
P.O. Box 31060
Mesa, AZ 85275
866-941-6368
adminreview@cnresource.com

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

due date