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Christopher N. RuszkowskiSusana MartinezSecretary of EducationGovernor

Administrative Review Summary and Corrective Actions

SFA Name:	Pueblo Pintado School	
SFA Code/ ID Number:	625000	
Administrative Review Conducted on:	Wednesday, November 1, 2017	
SFA Contact Name and Title:	Josephine Delgadito, Food Service Director	
CNR Reviewer:	Richard Cummard	

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on November 1, 2017; an exit conference summarizing the findings took place on the same day.

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 Friday, January 12, 2018. 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 Friday, January 12, 2018.

Thank you,

Carl Other , RD

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

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# Administrative Review Technical Assistance Summary

SFA Name:	Pueblo Pintado School	
SFA Code/ID Number:	625000	
Administrative Review Conducted on:	Wednesday, November 1, 2017	
SFA Contact Name and title:	Josephine Delgadito	
CNR Reviewer:	Richard Cummard	

#### **Commendations & Suggestions**

Outstanding job meeting all of the requirements for the lunch menu. All daily and weekly meal component and food quantity requirements were met for the week of menu review for lunch.

Great job with meal service

Great job with food storage

Fantastic job with training documentation and tracking of the training

## Other areas of Technical Assistance (Does NOT require SFA Response)

Menu Review- Technical assistance was provided in an email to the SFA with the breakfast menu review results. Suggestions were provided to bring the menus into compliance.

Local School Wellness Policy - Technical assistance was provided that when assessment of the Policy has been completed, that it needs to be made available to the public. SFA will need to provide supporting documentation such a s flyer, email, or website link with the assessment of the wellness policy to show that it has been made available to the public. 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. 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.

Civil Rights - Public release was only program material viewed. Technical Assistance provided that any and all program material related to the FNS program will need to contain the most recent non-discrimination statement.

Civil Rights - Technical assistance provided to SFA that any civil rights training documentation must contain the topics covered.

Food Safety - Technical assistance provided that once SFA formulates a food safety plan, it will need to be implemented.

Local School 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 School 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.

Food Safety - During the 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 six (6) months.

Food Safety - During the review, health inspections were discussed with the SFA. The SFA must post a copy of the most recent food safety inspection in a publicly visible location at the site.



## **Required Corrective Actions- Menu Review**

SFA Name:	Site(s) Selected for Review:			
Pueblo Pintado School	1 Pueblo Pintado School	NSLP Grade Group: K-8	SBP Grade Group: K-8	🗌 N/A
SFA ID Number:	2 N/A	NSLP Grade Group:	SBP Grade Group:	🗌 N/A
625000	3 N/A	NSLP Grade Group:	SBP Grade Group:	🗌 N/A
Week of Menu Review:				
9/11/17 - 9/15/17				

# 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.

## **Technical Assistance**

During the Administrative Review the results of the menu review were provided in a detailed Menu Review Results Report. Recommendations were included to bring all areas into compliance. All menus served within the SFA for the School Breakfast Program must meet all daily and weekly meal pattern requirements for the specific grade group. The SFA was encouraged to provide training as needed to ensure compliance. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews, may result in fiscal action.

For detailed regulations see: 7 CFR 220.10					
Required Criteria for Response to Findings	SFA Response	CNR Ir	nternal		
	Sirricopolise	Арру	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.		







**Required Corrective Actions- Review Areas** 

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

SFA Name:	Pueblo Pintado Schoo	<u> </u>	Administrative Review Conducto	ed: Wednesday, N	November 1, 2	2017
SFA Code/ID:	625000		Site(s) Selected for Review:	Pueblo Pintado	School	
				N/A		
				N/A		
Date Corrective Action F	lan was provided to SFA:	11/21/2017	Due Date for Correct	ive Action Plan:	<u>1/12/2018</u>	<u>.</u>
The following page	•	•	dministrative Review. There is an area or each in the spaces provided .	for a response for ea	ch finding.	
		Finding #1: - Civi	l Rights			
The SFA does not have a procedu	re in place for handling civil rig	hts complaints				
		Technical Assis	tance			
discrimination based on a prohibi Director, unless an approved Stat	ted basis has the right to file a e complaint procedure is in pla g, the person to whom the alle	complaint; all complaints ce; in the event a compla gations are made must w	sed. The procedure must indicate: tha , written or verbal, must be forwarded inant makes the allegations verbally c rite up the elements of the complaint	d to the appropriate R or in person and refus	Regional or FN es or is not ind	IS OCR clined
	For detailed regulation	n see: FNS Instruction 11.	3-1 Section XV Complaint Procedures			
Required	SFA Response		SFA Response		CNR Inte Appv.	ernal Use Intls.
<ol> <li>Provide the date that the findir the planned date of completion.</li> </ol>	ng was brought into compliance	e or				
<ol><li>Provide the name(s) and title(s will ensure compliance.</li></ol>	) of the SFA representative(s) t	hat				
<ol> <li>Provide a statement of assurar complaints regarding the meal pr</li> </ol>	5 5	ernally				

## Finding #2: Professional Standards

The new director(s) hired on or after July 1, 2015 did not meet the hiring standard requirements.

**Technical Assistance** 

During the review, hiring requirements were discussed with the SFA. To be in compliance, the SFA must ensure that any new director hired meets the new Professional Standards. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

For detailed regulation see: 210.30(b) Minimum standards for all school nutrition program directors.				
Required SFA Response	SFA Response	CNR Internal Use Appv. Intls.		
1. Provide the date that the finding was brought into compliance or the planned date of completion.		Арру.		
<ol><li>Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</li></ol>				
<ol> <li>Provide a statement of understanding that the SFA must ensure that any new director hired meets the new Professional Standards hiring requirements.</li> </ol>				
4. Provide any supporting documentation to show hiring requirements and training requirements are met. If training requirements have not been satisfied, a plan for how the new director will meet the training requirement must be submitted.				

### Finding #3: Professional Standards

The new school Nutrition Program Director did not complete food safety training within 30 days of being hired, and no previous food safety certification was obtained in the last 5 years

## **Technical Assistance**

During the review, hiring requirements with regards to food safety training were discussed with the SFA. To be in compliance, the SFA must ensure that any new director meets the new Professional Standards, including completing the required number of food safety training hours. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

For detailed regulation see:			
Required SFA Response	SFA Response	CNR Internal Us	
	ыллеэролье	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 food safety training hours.			
			1

Finding #4: Food Safety



The SFA's food safety plan does not contain the required elements.

**Technical Assistance** 

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.

A school food authority with a food safety program based on the process approach to HACCP must ensure that its program includes:

Standard operating procedures to provide a food safety foundation;

Menu items grouped according to process categories;

Critical control points and critical limits;

Monitoring procedures;

Corrective action procedures;

Recordkeeping procedures;

Periodic program review and revision.

For detailed regulation see: 210.13(c) Food safety program.				
Required SFA Response	SFA Response	CNR Inte	ernal Use	
	51 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 written statement that the food safety plan has been				
updated to include the required elements.				
4. Provide documentation that demonstrates the food safety plan has				
been updated and now contains all the required elements.				

Finding #5: Reporting and Record Keeping			
Records were not retained for 3 years after the final Claim for Reimburg	Records were not retained for 3 years after the final Claim for Reimbursement for the fiscal year or until resolution of any audits. The SFA did not maintain CEP		
documentation to support the established ISP.			
Technical Assistance			
Records must be retained for three (3) years after the final Claim for Re	imbursement for the fiscal year or until the resolution of any audits. It was determi	ned that the	
SFA was not retaining records for 3 years after the final Claim for Reimb	pursement. The requirement for the SFA to retain records for the required time per	iod was	
discussed with the SFA.			
For detailed regulation see: 210.23 (c) Retention of records.			
Required SFA Response	SFA Response	CNR Internal Use Appy. Intls.	
	Ар		

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1 Required	Corrective Actions- Review Areas	28
1. Provide the date that the finding was brought into compliance or the planned date of completion.		
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.		
3. Provide a written statement that includes: an indication that records will now be maintained for required time period and that a process that has been put into place to ensure that all required records will be maintained for 3 years after the final claim for reimbursement or until the resolution of an audit		

Finding #6: After	school Snac	ks Program
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Point-of-service snack counts by student/benefit category have not been maintained. Teachers mark off the total number of snacks received prior to service as the meal count.

## **Technical Assistance**

During the review, the requirements for maintaining point-of-service snack counts by student/benefit category were discussed with the SFA. The SFA must maintain documentation of point-of-service snack counts by student and benefit category. This finding may result in fiscal action.

For detailed regu	ılation see: SP 99-4: 7 CFR section 210.23©		
Required SFA Response	SFA Response	CNR Inte Appv.	ernal Use Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a statement of understanding that the SFA must maintain documentation of point-of-service snack counts by student and benefit category.			
4. Provide point of service meal count sheets for the month of December 2017 for Pueblo Pintado School			

Finding #7: Afterschool Snacks Program
Snacks have not been properly counted and claimed. Not all snacks counted/claimed were reimbursable. The SFA only offered one component per snack.
Technical Assistance
During the review, the requirements for properly counting and claiming snacks were discussed with the SFA. The SFA must count and claim only snacks that are
reimbursable. The afterschool snack meal pattern was discussed with the SFA and how to identify reimbursable snacks. This finding may result in fiscal action.
For detailed regulation see: 210.10(o)(2) Afterschool snacks

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Required	Corrective Actions- Review Areas		2
Required SFA Response	SFA Response	_	ernal Use
1. Provide the date that the finding was brought into compliance or		Appv.	Intls.
the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that			
will ensure compliance.			
3. Provide a statement of understanding that the SFA will follow			
proper counting and claiming methods for snacks.			
4. Provide point of service meal count sheets for the month of			
December 2017 for Pueblo Pintado School			
	-		
	g #8: Afterschool Snacks Program		
	uirements. The snack meal service was not held after school hours, and there wa	s no excep	otion
for expanded learning time programs			
	Technical Assistance		
-	d after school hours was discussed with the SFA. The SFA must hold the snack mea		
school hours, unless there is an exception for expanded learning time p	programs. SP 04-2011: A school operating longer than the traditional school day n	nay be elig	gible
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## **Technical Assistance**

During the review, production record, component, and portion size requirements were discussed with the SFA. The SFA must complete production records and serve snacks as described in 7 CFR 210.10(a)(3) and 7 CFR 210.10(o)(2). How to review nutrition labels, ingredient labels, CN labels, and use the food buying guide was

discussed for meal pattern compliance. This finding may result in fiscal action.

For detailed regulation see: 210.10(a)(3) Production and menu records.			
Required SFA Response	SFA Response	CNR Internal Us	
1. 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 understanding that the SFA must complete production records for the snack program that contain all required information.			
4. Provide 1 week of completed production records for all meal services at the reviewed site(s).			
5. Provide revised snack menus for the next time this menu would be offered to show compliance with the snack meal pattern.			

Finding	g #10: Afterschool Snacks Program		
The program is not monitored twice per year.			
The program was not monitored within the first 4 weeks of operation.			
	Technical Assistance		
During the review, program monitoring was discussed with the SFA. Th	e SFA must monitor the program twice per year.		ľ
During the review, program monitoring was discussed with the SFA. Th	e SFA must monitor the program within the first 4 weeks of operation.		
For detailed regulati	on see: 210.9(c) Afterschool care requirements.		
Required SFA Response	SFA Response	CNR Inte Appv.	ernal Use Intls.
1. Provide the date that the finding was brought into compliance or			
the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that			
will ensure compliance.			
3. Provide a statement of understanding that the SFA must monitor			
the Afterschool Snack Program twice per year, and once within the			
first 4 weeks of operation.			
4. The SFA must also complete the monitoring reviews and submit			
them or, if early in the year, must provide the date when monitoring			
will occur.			

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Finding #11: Resource Management

The SFA offers nonprogram adult meals for free without collecting reimbursement.

# **Technical Assistance**

Only food service employees may eat for free at the cost of the food service program. Any other staff members, visiting adults, or "lunch duty" staff must pay for the full cost of their meal, as outlined in FNS Instruction 782-5. 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 + \$.2325 commodities). The SFA was sent a copy of the October 2015 PED memo concerning Program Adult Meals. This memo clarifies that lunch duty staff cannot eat for free, as they do not meet the definition of a program adult.

For detailed regulation see: FNS Instruction 782-5, Rev. 1			
Required SFA Response	SFA Response	CNR Internal Use Appv. Intls.	
<ul> <li>Provide documentation showing that the SFA has either started to reimburse the food service account for the free nonprogram adult meals or has discontinued their policy of offering free nonprogram adult meals. If the food service program will be reimbursed, include:</li> <li>1) The source of the nonfederal funds (the general fund, outside organization, etc.).</li> <li>2) The frequency at which the food service program will be reimbursed (weekly, monthly, etc.).</li> <li>3) The rate the food service program will charge for these meals.</li> <li>4) If the reimbursement will come from an internal school transfer, provide an explanation showing that you know how to request a journal entry for an inter-departmental transfer through the BIE.</li> </ul>			

Finding #12: Resource Management
The SFA's adult meal price is not in compliance with FNS Instruction 782-5, Rev. 1.
Technical Assistance
The SFA has priced their adult meals below the cost of producing these meals. Adult meals should be priced at least at the free student per-meal reimbursements and
the value of commodities received. The SFA should be charging at least \$3.47 (\$3.24 USDA reimbursement + \$.2325 commodities). The SFA's adult lunch price of \$3.00
is not meeting this requirement. The SFA should increase adult meal prices to an appropriate level.
Reimbursement rates and the commodities value per-meal can be found on the USDA website:



https://www.fns.usda.gov/school-meals/rates-reimbursement https://www.fns.usda.gov/fdd/value-donated-foods-notices

For detailed regulation see: FNS Instruction 782-5, Rev. 1			
Required SFA Response	SFA Response	CNR Internal Use	
· · · ·	or A Response	Appv.	Intls.
1. Provide the date that the finding was brought into compliance or			
the planned date of completion. This should include documentation			
showing the new adult meal price.			
2. Provide the name(s) and title(s) of the SFA representative(s) that			
will ensure compliance.			
3. Provide a written statement outlining the SFA's adult meal pricing			
policy. This policy should establish guidelines for an annual			
reassessment of adult meal prices in line with FNS Instruction 782-5.			

Find	ing #13: Resource Management		
The SFA could not demonstrate that adult meal revenues accrued to th	ne food service account.		
	Technical Assistance		
	ected for October 11-13 2017, but was unable to provide a revenue report shou numentation showing that the collections were sent to the BIE and properly re \$36.00 in cash collected, and \$6.00 in payroll deductions.		
For detailed regulation	n see: 210.14(f) Revenue from nonprogram foods.		
Required SFA Response	SFA Response	CNR Inte Appv.	ernal Us Intls.
1. Provide a revenue report showing the \$42.00 in adult meal sales were deposited to the food service account.			

Check the confirmation check box, sign and date the form (typing in your signature is acceptable) and upload the signed copy to cnrsupport.com by the due date indicated.

By checking this box you confirm that all of the above responses have been reviewed and are representative of practices within the SFA. In addition the SFA ensures that additional training will be provided to all applicable staff to bring all finding areas into compliance moving forward.

Signature of SFA Representative:

Signature of CN Resource Reviewer:

<u>Ri</u>chard Cummard

Date: Date:

November 1, 2017

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































## 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 210School Breakfast Program:USDA FNS 7 CFR 220Determining Eligibility:USDA FNS 7 CFR 245

## Certification and Benefit Issuance:

2017-2018 Federal Income Eligibility Guidelines: <u>https://www.fns.usda.gov/school-meals/fr-041017</u>
2017-2018 USDA prototype Household Application and supporting forms: <u>https://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals</u>

### Verification:

2017-2018 USDA prototype Household Application and supporting forms: <u>https://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals</u>

<u>Counting and Claiming:</u> 2017-2018 USDA Reimbursement Rates: https://www.fns.usda.gov/school-meals/rates-reimbursement

Menu Compliance: USDA Nutrition Standards for School Meals: https://www.fns.usda.gov/school-meals/nutrition-standards-school-meals Whole Grain Resource Guide: https://fns-prod.azureedge.net/sites/default/files/WholeGrainResource.pdf Meal Pattern Guide by Grade Group: https://fns-prod.azureedge.net/sites/default/files/dietaryspecs.pdf *Offer vs Serve:* USDA Offer versus Serve Guidance Manual: https://fns-prod.azureedge.net/sites/default/files/SP57-2014a.pdf

Resource Management: 2017-2018 USDA Paid Lunch Equity Tool: https://www.fns.usda.gov/school-meals/paid-lunch-equity-sy2017-18-calculations-and-revised-tool USDA Non-Program Food Revenue Tool: https://www.fns.usda.gov/guidance-paid-lunch-equity-and-revenue-nonprogram-foods *Civil Rights:* USDA Non-Discrimination Statement https://www.fns.usda.gov/fns-nondiscrimination-statement USDA-FNS Accommodating Children with Disabilities in the School Meal Programs https://fns-prod.azureedge.net/sites/default/files/cn/SP40-2017a1.pdf *On-Site Monitoring:* USDA On-Site Monitoring forms for National School Lunch and School Breakfast Programs:

https://fns-prod.azureedge.net/sites/default/files/cn/SP56-2016os.pdf

<u>Wellness Policy:</u> USDA Wellness Policy Implementation Tools and Resources: <u>https://www.fns.usda.gov/tn/implementation-tools-and-resources</u>

<u>Smart Snacks:</u> USDA Guide to Smart Snacks: <u>https://fns-prod.azureedge.net/sites/default/files/tn/USDASmartSnacks.pdf</u>

<u>Professional Standards:</u> USDA Professional Standards tools and references: <u>https://www.fns.usda.gov/school-meals/professional-standards</u>

*Food Safety:* USDA Food Safety Resources: <u>https://www.fns.usda.gov/ofs/food-safety</u> Institute of Child Nutrition Food Safety Plan: <u>http://www.theicn.org/ResourceOverview.aspx?ID=75</u> *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\_

<u>Afterschool Snack Program:</u> USDA Webpage for the Afterschool Snack Program: <u>https://www.fns.usda.gov/school-meals/afterschool-snacks</u>

<u>Special Milk Program:</u> USDA Webpage for the Special Milk Program: <u>https://www.fns.usda.gov/smp/special-milk-program</u>

<u>Fresh Fruit and Vegetable Program:</u> USDA Fresh Fruit and Vegetable Program Handbook: <u>https://fns-prod.azureedge.net/sites/default/files/handbook.pdf</u>



<u>Community Eligibility Provision and Provision II:</u> USDA Community Eligibility Guidance and Updated FAQs: <u>https://www.fns.usda.gov/community-eligibility-provision-guidance-and-updated-gas-1</u>