



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

Name of School Food Authority: **Red River Charter School**
School Site(s) reviewed: Red River Charter School

Date of On-Site Review: **November 14, 2017**

Date Corrective Action Plan Was provided to SFA: **December 12, 2017**

Date your Corrective Action Plan Response is due to NMPED: January 12, 2017

COMMENDATIONS

PERFORMANCE STANDARD 1
SFA had sent out a public release to the local paper promoting the national school lunch program.

PERFORMANCE STANDARD 2
SFA had production records filled out correctly.

GENERAL AREAS
SFA had health inspection and food permits on site and up to date.
SFA had proper nondiscrimination statement posted at the serving area.

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

- A summary of the regulation / requirement
- The finding, and details specific to the SFA regarding the finding
- 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



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Finding #1

The SFA does not conduct a daily edit check for each meal service.

Regulation / Citation Summary

210.8(a)(3) Edit checks. (i) The following procedure shall be followed for school food authorities identified in paragraph (a)(2)(ii) of this section, by other school food authorities at State agency option, or, at their own option, by school food authorities identified in paragraph (a)(2)(i) of this section: the school food authority shall compare each school's daily counts of free, reduced price and paid lunches against the product of the number of children in that school currently eligible for free, reduced price and paid lunches, respectively, times an attendance factor.

SFA Suggested Guidance for Compliance

During the review, edit checks were discussed with the SFA. The SFA does not conduct a daily edit check for each meal service. To be in compliance, the SFA must ensure that edit checks are completed daily. How to complete edit checks to ensure meal counts do not exceed attendance adjusted eligible and/or total enrollment was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.

To come into compliance with the requirements for counting and claiming, the SFA must provide the State Agency with an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. The plan must include: an indication that the SFA is now conducting a daily edit check for each meal service, a description of the new process that has been implemented, a description of the training that was provided to staff to inform them of the new 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> and submit one week of completed edit checks.

SFA Response



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Finding #2

On-site monitoring was not completed.

Regulation / Citation Summary

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

SFA Suggested Guidance for Compliance

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

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

SFA Response



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Finding #3

The SFA is not tracking training hours.

Regulation / Citation Summary

210.30(g) School food authority oversight. Each school year, the school food authority director must document compliance with the requirements of this section for all staff with responsibility for school nutrition programs, including directors, managers, and staff. Documentation must be adequate to establish, to the State's satisfaction during administrative reviews, that employees are meeting the minimum professional standards.

SFA Suggested Guidance for Compliance

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.

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



Finding #4

The SFA does not have a food safety plan.

Regulation / Citation 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

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.

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



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Finding #5

Temperature logs are not being kept on file for at least 6 months.

Regulation / Citation 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

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.

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



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Finding #6

Production records were not complete for each day of the After School Snack Program.

Regulation / Citation Summary

210.10(a)(3) Production and menu records. Schools or school food authorities, as applicable, must keep production and menu records for the meals they produce. These records must show how the meals offered contribute to the required food components and food quantities for each age/grade group every day.

SFA Suggested Guidance for Compliance

During the review, production record requirements were discussed with the SFA. The SFA must complete production records as described in 7 CFR 210.10(a)(3). How to complete these records was discussed with the SFA. This finding may result in fiscal action.

To come into compliance with production record requirements, the SFA must provide an assurance that staff administering the Afterschool Snack Program understands these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan. Training for all afterschool snack program staff must be completed. Submit a copy of the completed sign in sheet and agenda for the training along with the date that the training was completed. The SFA must also submit revised production records to the State Agency, for each day of the review period.

SFA Response

Finding #7

The SFA does not have a reliable counting/claiming system.

Regulation / Citation Summary

210.7(c)(1)(v) The SFA shall ensure that Claims for Reimbursement do not request payment for any excess lunches produced, as prohibited in §210.10(a)(2), or non-Program lunches (i.e., a la carte or adult lunches) or for more than one meal supplement per child per day.

SFA Suggested Guidance for Compliance

During the review, claiming was discussed with the SFA. The SFA is claiming ineligible meals for reimbursement. To be in compliance, the SFA must ensure that no ineligible meals are claimed for reimbursement. Maintaining an accurate edit check and how to evaluate an edit check for accuracy was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.

SFA Response



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Finding #8

The SFA does not support documentation for the Identified Student Percentages and claiming percentages at the time of the review, as the SFA did not have documentation to support a directly certified status for all students who had been listed as Identified Students. (SFA was not able to support documentation on CEP establishment).

Regulation / Citation Summary

SP 15-2016: To determine if an ISP is accurate, State agencies must examine documentation submitted by the LEA to substantiate: (1) the number of identified students (numerator of the ISP), and (2) the number of enrolled students (denominator of ISP). Such source documentation includes direct certification lists and/or other lists certifying that students are categorically eligible for free school meals, such as lists of students who are designated as homeless or migrant.

SFA Suggested Guidance for Compliance

During the review, having the proper documentation for all Identified Students was discussed with the SFA. To be in compliance, the SFA must maintain source documentation for all directly certified students, such as direct certification lists and/or other lists certifying that students are categorically eligible for free school meals, including lists of students who are designated as homeless or migrant.

To come into compliance with the requirements for properly documenting the status of Identified Students in order to establish the ISP, the SFA must provide an assurance that staff administering the CEP lunch program understands these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan.

SFA Response



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Technical Assistance Provided

TA that was given was

1. **Was suggested to move to offer vs serve so there is no issue with reimbursable meals.**
2. **Milk need to be on ice during the serving hour.**
3. **Gave TA on the production record for lunch under the meal component section.**

Signature of Reviewer: _____ *Angelica Ruelas* _____ Date: 10/19/17

Signature of Nutritionist _____ Date: _____

Signature of SFA Representative: _____ Date: _____

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

**Name of Reviewer: Angelica Ruelas, Health Educator
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Please insert your detailed responses, save, print, sign, and scan/email or mail the signed copy to your Reviewer at the address above by the due date indicated. Thank you.