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Christopher N. Ruszkowski Susana Martinez
Secretary of Education Governor

Administrative Review Summary and Corrective Actions

SFA Name:	Rehoboth Christian School
SFA Code/ ID Number:	43002
Administrative Review Conducted on:	Thursday, October 26, 2017
SFA Contact Name and Title:	Susan Eddy, FSD
CNR Reviewer:	Danielle Reidy

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on October 26, 2017; an exit conference summarizing the findings took place on the same day/or enter date of exit conference.

The Administrative Review (AR) is a comprehensive evaluation of the Local Education Agency's (LEA's) National School Lunch Program (NSLP) and School Breakfast Program (SBP). The AR consists of two performance standards. While findings were identified, the two performance standards reviewed were found to be satisfactory. During the Administrative Review, compliance with the new meal pattern requirements is also evaluated, at this time there are no menu findings that warrant the termination of the performance based reimbursement.

This summary includes a comprehensive list of the technical assistance that was provided throughout the review as well as all findings that require a written response from the SFA. All items listed on the red Corrective Action tabs (Menu and Review) require a written response and must be submitted in writing to CN Resource, by **Thursday, December 21, 2017**. Please complete the responses electronically. If any additional responses are needed, please respond on district letterhead. In addition to responding to the findings please ensure that additional training is provided to all staff to bring all finding areas into compliance. Failure to submit the required materials by the due date may result in the withholding of claims. Should corrective actions not be submitted, a follow-up review may take place to ensure all required corrective actions were completed and implemented system-wide as appropriate.

Any potential fiscal action will be calculated once the corrective action responses have been received and approved.

I appreciate the courtesies extended by you and your personnel during the review. If you have questions or need assistance concerning the school food service program, please call our office. Please respond to the Administrative Review Corrective Actions by **Thursday, December 21, 2017**.

Thank you,



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

CN Resource

1930 N Arboleda, 101, Mesa, Arizona 85213

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CN Resource 1930 N Arboleda, 101, Mesa, Arizona 85213 480 325.9966

Administrative Review Technical Assistance Summary

SFA Name:	Rehoboth Christian School
SFA Code/ID Number:	43002
Administrative Review Conducted on:	Thursday, October 26, 2017
SFA Contact Name and title:	Susan Eddy, FSD
CNR Reviewer:	Danielle Reidy

Commendations & Suggestions

Great job meeting all vegetable subgroup requirements for the week of menu review. A nice variety of vegetables were offered.

Resource Management - The SFA's accounting ledger was organized and easy to review. The SFA is properly separating nonprogram revenues from program revenues and their line descriptions made it easy to trace catering reimbursements.

The SFA was very helpful during the onsite review and open to all feedback.

Kitchen is very clean and well organized.

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

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

Verification - Technical assistance provided to the SFA that the confirming and verifying officials only need to review and sign off on the applications if they have been selected for verification.

Meal Components and Quantities - Daily grain requirements were discussed. Technical assistance provided to the SFA that the 1oz WG requirement must be met before a meat/meat alternate can be used toward the weekly grain requirement.

Civil Rights - The SFA is currently using an outdated version of the "And Justice for All" poster. Technical assistance provided to the SFA to contact the State for the most current version.

Local School Wellness Policy - During the review, Local Wellness Policies were discussed with the SFA. The SFA's wellness committee does not include a school board member. 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.

Professional Standards - Technical assistance provided to the SFA to update their training tracker to include key areas and key topics.

Food Safety - During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated once opened.

Food Safety - The temperature logs were missing for a few days during the month of the onsite review. 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.

SFA Name:	Site(s) Selected for Review:			
<i>Rehoboth Christian School</i>	1 <i>Rehoboth Christian School</i>	NSLP Grade Group: K-8, 9-12	SBP Grade Group: K-12	<input type="checkbox"/> N/A
SFA ID Number:	2 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
<i>43002</i>	3 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
Week of Menu Review:	<u>9/11/17 - 9/15/17</u>			

Menu Review Findings: Lunch

Site 1:
Grade Group K-8
 1. For the week of menu review, the lunch menu did not meet the minimum daily requirement for grain. A grain was offered daily, however the minimum required portion size was not met. This is a repeat finding.

Grade Group 9-12
 1. For the week of menu review, the lunch menu did not meet the minimum daily requirement for meat/meat alternate. A meat/meat alternate was offered daily, however the minimum daily required portion size was not met. This is a repeat finding.
 2. For the week of menu review, the lunch menu did not meet the minimum grain requirements. The minimum portion size was not met and not all grains offered at lunch were whole grain-rich. This contributed to not meeting the following requirements: daily grain, weekly grain, and whole grain-rich.
 3. For the week of menu review, the lunch menu did not meet the minimum daily fruit requirement. Fruit was offered daily, however the minimum required portion size was not met. This is a repeat finding.

Technical Assistance

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

For detailed regulations see: 7 CFR 210.10

Required Criteria for Response to Findings	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide a written statement that all menus will be reviewed to ensure that all components are offered in at least the minimum amount required to meet the daily and weekly requirements.			
2. List the steps that will be taken when a site does not have one of the planned menu items or there are insufficient quantities on the serving day.			
3. Provide a written statement that the serving line will be visually reviewed prior to service to confirm that all required components are available.			



4. Submit the position title(s) of the SFA representative(s) that will oversee this area and ensure future compliance.			
5. Submit 1 week of menus and production records that indicate all menu items, the portion size and the component contribution for each item.			
6. Provide labels, ingredient lists, CN labels, product formulation statements, and revised or new recipes as needed for any items that have been added to the menu, if they have replaced an item, indicate the item that it replaced.			

Menu Review Findings: Breakfast

Grade Group K-12

1. For the week of menu review, the breakfast menu did not meet the minimum daily fruit requirement. Fruit was offered daily, however the minimum required portion size was not met. This is a repeat finding.

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 Internal	
		Appv	Intls.
1. Provide a statement that all menus will be reviewed to ensure that all components are offered in at least the minimum amount required to meet the daily and weekly requirements as applicable.			
2. Provide a written process for sites to reference when they do not have one of the planned menu items or there are insufficient quantities on the serving day.			
3. Provide a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available.			
4. Submit the position title(s) of the SFA representative(s) that will oversee this area and ensure future compliance.			
5. Submit 1 week of menus and production records that indicate all menu items, the portion size and the component contribution for each item.			

6. Provide labels, ingredient lists, CN labels, product formulation statements, and revised or new recipes as needed for any items that have been added to the menu, if they have replaced an item, indicate the item that it replaced.

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Required Corrective Actions- Review Areas
New Mexico Public Education
Coordinated School Health & Wellness
Administrative Review Corrective Action Plan

SFA Name: Rehoboth Christian School
 SFA Code/ID: 43002

Administrative Review Conducted: Thursday, October 26, 2017
 Site(s) Selected for Review: Rehoboth Christian School
N/A
N/A

Date Corrective Action Plan was provided to SFA: 11/21/2017

Due Date for Corrective Action Plan: 12/21/2017

The following pages address the findings that were identified during the Administrative Review. There is an area for a response for each finding.

Please enter the detailed response for each in the spaces provided .

Finding #1: Resource Management		
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 or organization that will pay for the free meals and ensure the non-federal funds are received by the food service program. These meals should accrue as nonprogram revenue to the food service account. 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.		
<i>For detailed regulation see: FNS Instruction 782-5, Rev. 1</i>		
Required SFA Response	SFA Response	CNR Internal Use
		Appv. Intls.

<p>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:</p> <ol style="list-style-type: none"> 1) The source of the nonfederal funds (the general fund, outside organization, etc.). 2) The frequency at which the food service program will be reimbursed (weekly, monthly, etc.). 3) The rate the food service program will charge for these meals. 			
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Finding #2: Resource Management

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 student price plus per-meal reimbursements and the value of commodities received. The SFA should be charging at least \$3.72 (\$3.10 student price + \$.39 USDA reimbursement + \$.2325 commodities). The SFA's adult lunch price of \$3.10 is not meeting this requirement. The SFA should increase adult meal prices to an appropriate level. The SFA received a finding for underpriced adult meals on their previous Administrative Review, but has not come into compliance.

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-notice>

For detailed regulation see: FNS Instruction 782-5, Rev. 1

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. 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.			

<p>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.</p>			
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Finding #3: Resource Management

Resource Management - The SFA sold nonprogram foods, but did not determine compliance with nonprogram food requirements.

Technical Assistance

The SFA has not determined compliance with nonprogram food revenue requirements. The USDA NonProgram Food Revenue Tool should be completed every year. You can use a 5-day reference period to complete the tool. This tool should include adult/staff meals and extra milks as your nonprogram foods. If the tool shows you are out of compliance, you need to increase nonprogram food prices. A copy of the tool and a link to USDA memo SP 20-2016 was sent in an email during this review. Both documents can be found on the USDA website. The SFA was given technical assistance concerning the NonProgram Food Revenue Tool during their last Administrative Review, but has not yet completed the tool.

For detailed regulation see: 210.14(f) Revenue from nonprogram foods.

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
<p>1. Provide a written statement of understanding that the USDA Nonprogram Food Revenue Tool will be completed each year. This should include a timeframe for when the tool will be completed and assurance that the SFA will take the necessary steps to come into compliance if the tool shows they did not generate sufficient nonfederal revenue.</p>			
<p>2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p>			
<p>3. Submit a completed copy of the USDA NonProgram Food Revenue Tool, including the calculations and documentation used to complete the tool. If the tool shows you are out of compliance, include a written statement explaining how nonprogram food prices will be increased to come into compliance.</p>			

Finding #4: Certification & Benefit Issuance

Household notification of denied benefits is not consistent with FNS requirements, as it does not contain the required information.

Technical Assistance

During the review, household notification of eligibility status was discussed with the SFA. For all households that qualify for benefits must be notified within 10 days of receipt of the completed application, however it is not required that these households are notified in writing. The SFA must notify the household of denied benefits in writing, the notification must be provided within 10 days of receipt of a completed application. At a minimum the notification of denial letter must include The reason for the denial of benefits, e.g. income in excess of allowable limits or incomplete application, notification of the right to appeal, instructions on how to appeal, and a statement reminding parents that they may reapply for free or reduced price benefits at any time during the school year. For additional information on the notification letter the SFA should review the Eligibility Manual for School Meals, Chapter 3.

For detailed regulation see: 245.6(c)(6) Application, eligibility and certification

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.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Revise the notification of denied benefits to include all of the FNS requirements.			
4. Provide a copy of the revised letter.			

Finding #5: Certification & Benefit Issuance

The SFA does send a Direct Certification letter to households that have been identified on the Direct Certification list.

Technical Assistance

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.

For detailed regulation see: 245.6(c)(6)(ii) Application, eligibility and certification

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.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a copy of the revised Direct Certification letter that includes all of the USDA requirements.			

Finding #6: Verification

The SFA did not verify the correct number of applications.

Technical Assistance

During the review, the number of applications to be reviewed was discussed with the SFA. The SFA must verify exactly the number of applications as described in the Eligibility Manual for School Meals, Chapter 4.

For detailed regulation see: 245.6a(c)(3) Standard sample size.			
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.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a statement of assurance that the staff conducting verification understand(s) how to calculate the correct number of applications that must be verified.			

Finding #7: Verification

The verifying official is also the hearing official.

Technical Assistance

During the review the SFA was informed that the hearing official may not also be the determining, confirming official or verifying official. The SFA should review the current Income Eligibility Manual for additional verification requirements.

For detailed regulation see: 245.6a(e)(1)(i) Confirmation

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.			
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 verifying official will not also be the hearing official.			
4. Provide the person(s) by position(s) who will be the determining official for all applications, the confirming official for verification, and the verifying official.			

Finding #8: Meal Counting and Claiming

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

Technical Assistance

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.

For detailed regulation see:

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.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a statement that the SFA will complete a daily edit check and will maintain edit check records for a minimum of 3 years plus the current school year.			

Finding #9: Meal Components and Quantities

The production records are incomplete, not all required fields are correctly documented.

Technical Assistance

During the review, production records were discussed with the SFA. The SFA must ensure that all sites are keeping accurate and complete production records for the meals they produce. The records must be completed throughout meal service and maintained everyday. At a minimum the production records should include the name of the item, the recipe or item number, the portion size, the number of planned portions, the component contribution amount and the number of actual servings. All kitchen staff should be trained on completing productions records so that everyone can complete the records.

For detailed regulation see: 210.10(a)(3)Production and menu records.

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.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a statement that the SFA will maintain completed production records for all meal services. The records must be kept on file for a minimum of 3 years plus the current school year.			
4. Provide 1 week of completed production records for all meal services at the reviewed site(s).			

Finding #10: Offer Vs. Serve

The cafeteria staff has not been trained on Offer versus Serve.

Technical Assistance

During the review, the training requirement for Offer versus Serve was discussed. 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.

For detailed regulation see: Offer vs. Serve Guidance Manual (Page 4)

Required SFA Response	SFA Response	CNR Internal Use	
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Required SFA Response	SFA 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. List the steps the SFA will take to ensure that all staff will be trained annually on Offer versus Serve.			

Finding #11: Offer Vs. Serve

Offer versus Serve is not being implemented correctly. The SFA required students to take all meal components.

Technical Assistance

During the review, requirements for Offer versus Serve were reviewed with the SFA. Requirements include that Senior high schools must participate in Offer vs. Serve.

For detailed regulation see: 210.10 (e) Offer versus serve.

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.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a written statement that Offer vs Serve is now being implemented properly.			

Finding #12: Civil Rights

The SFA is using the incorrect civil rights statement. They are using an outdated version of the statement on letters and the Public Release.

Technical Assistance

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.

For detailed regulation see: FNS Instruction 113-1 IX A 3 Nondiscrimination Statement.

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.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a written statement that the non-discrimination statement has been added to all nutrition program materials.			
4. Provide an example to show that the non-discrimination statement has been added. Ex: any letter to the household.			

Finding #13: Civil Rights			
The SFA is attempting to resolve complaints alleging discrimination within the FNS School Meal Programs.			
Technical Assistance			
During the review the process for receiving and processing complaints alleging discrimination was discussed with the SFA. The SFA should not attempt to resolve complaints in-house and should forward all complaints to the appropriate outside agency.			
For detailed regulation see: FNS Instruction 113-1 Section XV Complaint Procedures			
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.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a statement of assurance that all alleged civil rights complaints regarding the meal programs will not be handled internally and that the complaints will be forwarded to the appropriate agency.			

Finding #14: Local School Wellness Policy			
The SFAs Local Wellness Policy does not contain all of the required components. The Wellness Policy does not include designation of one or more SFA officials in charge of school compliance oversight. The wellness policy does not contain guidance for all foods available on campus.			
Technical Assistance			
During the review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to contain the following: a designation of one or more SFA officials in charge of school compliance oversight; a plan for measuring compliance; goals for nutrition education, nutrition promotion, other school based activities to promote student wellness, and physical activity; and guidance for all foods available on school campus. The SFA should also contact the state agency to determine if there are any additional requirements from the state or if they have any state specific resources. The SFA was provided with the USDA link for Wellness Policies. http://www.fns.usda.gov/tn/local-school-wellness-policy			
For detailed regulation see: 210.31 Local school wellness policy			
Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a copy of the updated Local Wellness Policy.			

Finding #15: Smart Snacks			
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The SFA is selling items that do not meet the Smart Snacks nutrition standards for beverages sold to high school students during the school day.			
Technical Assistance			
During the review, beverage rules under Smart Snacks were discussed with the SFA. The SFA must ensure that all beverages meet the requirements, based on the level of the school (elementary, middle, high) where they are sold.			
<i>For detailed regulation see: 210.11 (m)(3) High schools.</i>			
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.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. List the steps the SFA will take to ensure that all items sold to students during the day meet Smart Snacks nutrition standards.			

Finding #16: Professional Standards			
The employees outside of the school nutrition program whose responsibilities include duties related to the operation of the school nutrition program did not receive training applicable to their duties related to the program.			
Technical Assistance			
During the review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that employees outside of the School Nutrition programs (whose responsibilities include duties related to the operation of the School Nutrition program) receive adequate training specific to the task they perform. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.			
<i>For detailed regulation see: SP 39-2015: Question 29</i>			
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.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. List the names, length, and date of trainings that have been completed/planned to meet the required training applicable to their duties in the program.			

Finding #17: Food Safety			
The SFA's food safety plan does not contain the required elements. Menu items are not grouped according to process approach.			
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 Internal Use	
		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 statement that a complete food safety plan is available at each site within the SFA.			

Finding #18: Food Safety

The SFA did not have the most recent food safety inspection report posted in a publicly visible location.

Technical Assistance

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.

For detailed regulation see: 210.13(b) Food safety inspections.

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.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a written statement that the most recent food safety inspection is posted in a visible location.			

Finding #19: Food Safety

During the review, health inspections were discussed with the SFA. The SFA must request two health inspections for each site for each school year and must maintain documentation of this request.

Technical Assistance

During the review, health inspections were discussed with the SFA. The SFA must request two health inspections for each site for each school year and must maintain documentation of this request.

<i>For detailed regulation see: 210.13(b) Food safety inspections.</i>			
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.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a written statement that the SFA has requested two health inspections for the current school year and will annually request two inspections be completed moving forward.			
4. Provide a copy of the inspection request.			

Finding #20: Reporting and Record Keeping

Health safety inspections have not been maintained on file.

Technical Assistance

Records must be retained for three (3) years after the final Claim for Reimbursement for the fiscal year or until the resolution of any audits. It was determined that the SFA was not retaining records for 3 years after the final Claim for Reimbursement. The requirement for the SFA to retain records for the required time period was discussed with the SFA.

For detailed regulation see: 210.23 (c) Retention of records.

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.			
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 #21: Certification and Benefit Issuance

Not all selected applications were approved correctly. Not all applications included the names of all household members.
Not all selected applications were approved correctly. The SFA did not calculate the income and household size correctly.

Technical Assistance

Complete applications must include the appropriate documentation. 245.2 Documentation means: (1) The completion of a free and reduced price school meal or free milk application which includes: (i) For households applying on the basis of income and household size, names of all household members; income received by each household member, identified by source of the income (such as earnings, wages, welfare, pensions, support payments, unemployment compensation, and social security and other cash income); the signature of an adult household member; and the last four digits of the social security number of the adult household member who signs the application or an indication that the adult does not possess a social security number.

During the review, determining applications was discussed with the SFA. When determining eligibility, the SFA must ensure that the household has listed the amounts, source, and frequency of current income for each household member; otherwise, the application is incomplete. For more information, see the Eligibility Manual for School Meals, Chapter 3. When determining the total household income the SFA must use all income provided on the application.

For detailed regulation see: Eligibility Manual, Chapter 3: Establishing Eligibility and 245.6(c)(4) Application, eligibility and certification

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.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a statement that the staff approving applications understand the requirements.			
4. Describe how all applications will be determined correctly moving forward.			

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: _____

Date: _____

Signature of CN Resource Reviewer: *Danielle Reidy*

Date: October 26, 2017

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



Required Corrective Actions- Review Areas

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 210](#)

School Breakfast Program: [USDA FNS 7 CFR 220](#)

Determining Eligibility: [USDA FNS 7 CFR 245](#)

Certification and Benefit Issuance:

2017-2018 Federal Income Eligibility Guidelines:

<https://www.fns.usda.gov/school-meals/fr-041017>

2017-2018 USDA prototype Household Application and supporting forms:

<https://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals>

Verification:

2017-2018 USDA prototype Household Application and supporting forms:

<https://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals>

Counting and Claiming:

2017-2018 USDA Reimbursement Rates:

<https://www.fns.usda.gov/school-meals/rates-reimbursement>

Menu Compliance:

USDA Nutrition Standards for School Meals:

<https://www.fns.usda.gov/school-meals/nutrition-standards-school-meals>

Whole Grain Resource Guide:

<https://fns-prod.azureedge.net/sites/default/files/WholeGrainResource.pdf>

Meal Pattern Guide by Grade Group:

<https://fns-prod.azureedge.net/sites/default/files/dietaryspecs.pdf>

Offer vs Serve:

USDA Offer versus Serve Guidance Manual:

<https://fns-prod.azureedge.net/sites/default/files/SP57-2014a.pdf>

Resource Management:

2017-2018 USDA Paid Lunch Equity Tool:

<https://www.fns.usda.gov/school-meals/paid-lunch-equity-sy2017-18-calculations-and-revised-tool>

USDA Non-Program Food Revenue Tool:

<https://www.fns.usda.gov/guidance-paid-lunch-equity-and-revenue-nonprogram-foods>

Civil Rights:

USDA Non-Discrimination Statement

<https://www.fns.usda.gov/fns-nondiscrimination-statement>

USDA-FNS Accommodating Children with Disabilities in the School Meal Programs

<https://fns-prod.azureedge.net/sites/default/files/cn/SP40-2017a1.pdf>

On-Site Monitoring:

USDA On-Site Monitoring forms for National School Lunch and School Breakfast Programs:

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

Wellness Policy:

USDA Wellness Policy Implementation Tools and Resources:

<https://www.fns.usda.gov/tn/implementation-tools-and-resources>

Smart Snacks:

USDA Guide to Smart Snacks:

<https://fns-prod.azureedge.net/sites/default/files/tn/USDASmartSnacks.pdf>

Professional Standards:

USDA Professional Standards tools and references:

<https://www.fns.usda.gov/school-meals/professional-standards>

Food Safety:

USDA Food Safety Resources:

<https://www.fns.usda.gov/ofs/food-safety>

Institute of Child Nutrition Food Safety Plan:

<http://www.theicn.org/ResourceOverview.aspx?ID=75>

Buy American Provision:

2017 USDA Memo on Compliance with Buy American Provision:

<https://fns-prod.azureedge.net/sites/default/files/cn/SP38-2017os.pdf>

School Breakfast and Summer Food Service Program Outreach:

<https://www.fns.usda.gov/sfsp/raise-awareness>

Afterschool Snack Program:

USDA Webpage for the Afterschool Snack Program:

<https://www.fns.usda.gov/school-meals/afterschool-snacks>

Special Milk Program:

USDA Webpage for the Special Milk Program:

<https://www.fns.usda.gov/smp/special-milk-program>

Fresh Fruit and Vegetable Program:

USDA Fresh Fruit and Vegetable Program Handbook:

<https://fns-prod.azureedge.net/sites/default/files/handbook.pdf>

Community Eligibility Provision and Provision II:

USDA Community Eligibility Guidance and Updated FAQs:

<https://www.fns.usda.gov/community-eligibility-provision-guidance-and-updated-qas-1>