



New Mexico Public Education Department
Student Success & Wellness Bureau
Administrative Review Corrective Action Plan

Name of School Food Authority (SFA):	Santo Nino Catholic School
School Sites reviewed:	Santo Nino Catholic School
Date of On-Site Review:	November 14, 2017
Date Corrective Action Plan Was provided to SFA:	November 28, 2017
Date your Corrective Action Plan Response is due to NMPED:	December 28, 2017

COMMENDATIONS

PERFORMANCE STANDARD 1
Used correct Income Guidelines to determine eligibility
Used correct household notification for eligible students
Eligibility for students at the Point of Service was not overt

PERFORMANCE STANDARD 2
Meal components for meal pattern were available on the day of review
Signage posted on reimbursable tray
Two types of milk offered at each meal

GENERAL AREAS
Potable water available in service area
HACCP plan available at the selected school sites
Professional Standards maintained by Food Service Management Company

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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Please provide a detailed response to each finding in the spaces provided

Finding #1			
Breakfast and lunch meal pattern was not met for Grade 6 for the week of review. The meal pattern was short by one (1) ounce of whole grain for the week.			
Regulation / Citation Summary			
§210.10 Meal requirements for lunches and requirements for afterschool snacks.			
(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established in the following table:			
Meal pattern	Lunch meal pattern		
	Grades K-5	Grades 6-8	Grades 9-12
	Amount of food ^a per week (minimum per day)		
Fruits (cups) ^b	2½ (½)	2½ (½)	5 (1)
Vegetables (cups) ^b	3¼ (¼)	3¼ (¼)	5 (1)
Dark green ^c	½	½	½
Red/Orange ^c	¼	¼	1¼
Beans and peas (legumes) ^c	½	½	½
Starchy ^c	½	½	½
Other ^{c,d}	½	½	¼
Additional Veg to Reach Total ^c	1 ^e	1 ^e	1½ ^e
Grains (oz eq) ^f	8-9 (1)	8-10 (1)	10-12 (2)
Meats/Meat Alternates (oz eq)	8-10 (1)	9-10 (1)	10-12 (2)
Fluid milk (cups) ^g	5 (1)	5 (1)	5 (1)
SFA Suggested Guidance for Compliance			
In order for the SFA to come into compliance the SFA to ensure regulation is being met by:			
<ul style="list-style-type: none"> Describe preventative measures to avoid this occurrence in the future. List the person and title that is responsible for ensuring meal pattern is being followed for all grades. 			
SFA Response			



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Finding #2

Error prone applications were not pulled for verification.

Regulation / Citation Summary

§245.6a Verification requirements

(c) Verification requirement—(1) General. The local educational agency must verify eligibility of children in a sample of household applications approved for free and reduced price meal benefits for that school year.

(3) Standard sample size. Unless eligible for an alternative sample size under paragraph (d) of this section, the sample size for each local educational agency shall equal the lesser of: (i) Three (3) percent of all applications approved by the local educational agency for the school year, as of October 1 of the school year, selected from error prone applications;

SFA Suggested Guidance for Compliance

In order for the SFA to come into compliance the SFA to ensure regulation is being met by:

- Describe preventative measures to avoid this occurrence in the future.
- List the person and title that is responsible for ensuring that error prone applications will be used for verification.

SFA Response

Finding #3

Benefit Issuance list didn't distinguish correct eligibility between free income and free categorically free.

Regulation / Citation Summary

§210.7 Reimbursement for school food authorities.

(c) Reimbursement limitations. To be entitled to reimbursement under this part, each school food authority shall ensure that Claims for Reimbursement are limited to the number of free, reduced price and paid lunches and meal supplements that are served to children eligible for free, reduced price and paid lunches and meal supplements, respectively, for each day of operation.

(1) Lunch count system. To ensure that the Claim for Reimbursement accurately reflects the number of lunches and meal supplements served to eligible children, the school food



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authority shall, at a minimum:

(ii) Maintain a system to issue benefits and to update the eligibility of children approved for free or reduced price lunches and meal supplements. The system shall:

(A) Accurately reflect eligibility status as well as changes in eligibility made after the initial approval process due to verification findings, transfers, reported changes in income or household size, etc.; and

SFA Suggested Guidance for Compliance

In order for the SFA to come into compliance the SFA to ensure regulation is being met by:

- Describe preventative measures to avoid this occurrence in the future.
- List the person and title that is responsible for ensuring the initial Benefit Issuance list is maintained.

SFA Response

Finding #4

Meal counts for October 2017 and September 2017 were different than the claims that were submitted.

Regulation / Citation Summary

§210.8 Claims for reimbursement.

(a) *Internal controls.* The school food authority shall establish internal controls which ensure the accuracy of meal counts prior to the submission of the monthly Claim for Reimbursement. At a minimum, these internal controls shall include: an on-site review of the meal counting and claiming system employed by each school within the jurisdiction of the school food authority; comparisons of daily free, reduced price and paid meal counts against data which will assist in the identification of meal counts in excess of the number of free, reduced price and paid meals served each day to children eligible for such meals; and a system for following up on those meal counts which suggest the likelihood of meal counting problems.

(2) *School food authority claims review process.* Prior to the submission of a monthly Claim for Reimbursement, each school food authority shall review the lunch count data for each school under its jurisdiction to ensure the accuracy of the monthly Claim for Reimbursement. The objective of this review is to ensure that monthly claims include only the number of free, reduced price and paid lunches served on any day of operation to



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children currently eligible for such lunches.

(i) Any school food authority that was found by its most recent administrative review conducted in accordance with §210.18, to have no meal counting and claiming violations may:

(A) Develop internal control procedures that ensure accurate meal counts. The school food authority shall submit any internal controls developed in accordance with this paragraph to the State agency for approval and, in the absence of specific disapproval from the State agency, shall implement such internal controls. The State agency shall establish procedures to promptly notify school food authorities of any modifications needed to their proposed internal controls or of denial of unacceptable submissions. If the State agency disapproves the proposed internal controls of any school food authority, it reserves the right to require the school food authority to comply with the provisions of paragraph (a)(3) of this section;

SFA Suggested Guidance for Compliance

In order for the SFA to come into compliance the SFA to ensure regulation is being met by:

- Describe preventative measures to avoid this occurrence in the future.
- List the person and title that is responsible for ensuring the initial Benefit Issuance list is maintained.
- Submit November 2017 meal counts for breakfast and lunch

SFA Response

Empty response area for the School Food Authority.

Finding #5

There was no indication that the thermometer was being calibrated in accordance with HACCP on file and storage violations were observed to include no dates on food items; tortillas, bread and oatmeal.

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)



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Establish corrective actions; (vi) Establish verification procedures; and (vii) Establish a recordkeeping system. (2) A school food authority with a food safety program based on the process approach to HACCP must ensure that its program includes: (i) Standard operating procedures to provide a food safety foundation; (ii) Menu items grouped according to process categories; (iii) Critical control points and critical limits; (iv) Monitoring procedures; (v) Corrective action procedures; (vi) Recordkeeping procedures; and (vii) Periodic program review and revision.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for food safety:

- SFA must provide the State Agency with an assurance that the appropriate staff understand the requirements for a food safety plan to include documenting calibration of thermometer and dating of all foods.
- Submit the name and title of the SFA representative that will oversee this process and ensure compliance.
-

SFA Response

Finding #6

No evidence of edit checks being completed.

Regulation / Citation Summary

§210.8 Claims for reimbursement.

(a) *Internal controls.* The school food authority shall establish internal controls which ensure the accuracy of meal counts prior to the submission of the monthly Claim for Reimbursement. At a minimum, these internal controls shall include: an on-site review of the meal counting and claiming system employed by each school within the jurisdiction of the school food authority; comparisons of daily free, reduced price and paid meal counts against data which will assist in the identification of meal counts in excess of the number of free, reduced price and paid meals served each day to children eligible for such meals; and a system for following up on those meal counts which suggest the likelihood of meal counting problems.

(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



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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

In order for the SFA to come into compliance the SFA to ensure regulation is being met by:

- Describe preventative measures to avoid this occurrence in the future.
- List the person and title that is responsible for ensuring that edit checks will be performed monthly.
- Submit edit checks for October and November 2017

SFA Response

[Empty response box]

Technical Assistance Provided

- Ensure on the application if there is a question about the case number for categorical eligibility that it is verified by the SFA
- Verification amount exceeded the required amount. SFA sampled 10% rather than the 3% of error prone applications
- It was unclear if SFA was Offer vs. Serve (OVS) due to most students getting milk. SFA will need to implement OVS correctly: for breakfast 3 out of 4 items and lunch 3 out of 5 components 1/2 c. of fruit or vegetable required for reimbursable tray
- Production records need to properly indicate component for substitutions on fruit as production records should be an accurate indication of what is being served during that meal
- Direct Certification needs to be obtained from PED to directly certify students who are eligible.

Signature of Reviewer:

Date:

11/28/17

Signature of SFA Representative:

Date:



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

**Name of Reviewer: Claudia Duran, 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.