



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

Name of School Food Authority:	Taos Day School
School Site reviewed:	Taos Day School
Date of On-Site Review:	October 11, 2017
Date Corrective Action Plan Was provided to SFA:	October 23, 2017
Date your Corrective Action Plan Response is due to NMPED:	November 27, 2017

COMMENDATIONS

PERFORMANCE STANDARD 1
Edit checks performed

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

GENERAL AREAS
Potable water available
HACCP plan available
SBP and SSO outreach performed

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



SFA Suggested Guidance for Compliance

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

1. Describe preventative measures to avoid this occurrence in the future.
2. List the person and title that is responsible for entering the claims on the Nutrition Portal.
3. Submit a copy of documentation that will be utilized as a means of communication between the ASSP and cafeteria staff to reflect the correct numbers of snacks that are being served.

SFA Response

Finding #3

Production records were not being filled out immediately after meal services. Some components substituted without the knowledge of the component being comparable. When substitutions are made, they need to be comparable to ensure that the weekly requirements are being met as designed by the nutritionist.

Regulation / Citation Summary

7CFR 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. Labels or manufacturer specifications for food products and ingredients used to prepare school meals must indicate zero grams of *trans* fat per serving (less than 0.5 grams). Schools or school food authorities must maintain records of the latest nutritional analysis of the school menus conducted by the State agency. Production and menu records must be maintained in accordance with FNS guidance.

(b) Meal requirements for school lunches. School lunches for children ages 5 and older must reflect food and nutrition requirements specified by the Secretary. Compliance with these requirements is measured as follows:

(1) On a daily basis:

(i) Meals offered to each age/grade group must include the food components and food quantities specified in the meal pattern in paragraph (c) of this section;

(ii) Food products or ingredients used to prepare meals must contain zero grams of *trans*



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fat per serving or a minimal amount of naturally occurring *trans* fat; and

(iii) The meal selected by each student must have the number of food components required for a reimbursable meal and include at least one fruit or vegetable.

(2) Over a 5-day school week:

(i) Average calorie content of meals offered to each age/grade group must be within the minimum and maximum calorie levels specified in paragraph (f) of this section;

(ii) Average saturated fat content of the meals offered to each age/grade group must be less than 10 percent of total calories; and

(iii) Average sodium content of the meals offered to each age/grade group must not exceed the maximum level specified in paragraph (f) of this section.

(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:

SFA Suggested Guidance for Compliance

To come into compliance with production record requirements, the SFA must provide an assurance that staff 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 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

[Empty response area]

Finding #4

Initial Direct Certification used to determine Community Eligibility Provision was not available for review.

Regulation / Citation Summary

§210.9 Agreement with State agency.

(19) Maintain direct certification documentation obtained directly from the appropriate State or local agency, or other appropriate individual, as specified by FNS, indicating that:

(i) A child in the *Family*, as defined in §245.2 of this chapter, is receiving benefits from *SNAP*, *FDPIR* or *TANF*, as defined in §245.2 of this chapter; if one child is receiving such benefits, all children in that family are considered to be directly certified;



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- (ii) The child is a homeless child as defined in §245.2 of this chapter;
- (iii) The child is a runaway child as defined in §245.2 of this chapter;
- (iv) The child is a migrant child as defined in §245.2 of this chapter;
- (v) The child is a Head Start child as defined in §245.2 of this chapter; or
- (vi) The child is a foster child as defined in §245.2 of this chapter.

(20) Retain eligibility documentation submitted by families for a period of 3 years after the end of the fiscal year to which they pertain or as otherwise specified under paragraph (b)(17) 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:

1. Describe preventative measures to avoid this occurrence in the future.
2. List the person and title that is responsible for ensuring the initial Direct Certification is retained.

SFA Response

Finding #5

Wellness policy was not made readily available to the public or assessed.

Regulation / Citation Summary

7 CFR 210.30 Local School Wellness Policy. (c) Content of the plan. At a minimum, local school wellness policies must contain: (1) Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. In developing these goals, local educational agencies must review and consider evidence-based strategies and techniques; (2) Standards for all foods and beverages provided, but not sold, to students during the school day on each participating school campus under the jurisdiction of the local educational agency; (3) Standards and nutrition guidelines for all foods and beverages sold to students during the school day on each participating school campus under the jurisdiction of the local educational agency that; (i) Are consistent with applicable requirements set forth under §§ 210.10 and 220.8 of this chapter; (ii) Are consistent with the nutrition standards set forth under § 210.11; (iii) Permit marketing on the school campus during the school day of only those foods and beverages that meet the nutrition standards under § 210.11; and (iv) Promote student health and reduce childhood obesity. (4) Identification of the



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position of the LEA or school official(s) or school official(s) responsible for the implementation and oversight of the local school wellness policy to ensure each school's compliance with the policy; (5) A description of the manner in which parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public are provided an opportunity to participate in the development, implementation, and periodic review and update of the local school wellness policy; and (6) A description of the plan for measuring the implementation of the local school wellness policy, and for reporting local school wellness policy content and implementation issues to the public, as required in paragraphs (d) and (e) of this section.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for Local School Wellness Policies, the SFA must submit a written assurance that the appropriate staff understands the requirements for the Wellness Policy. Provide the information where the Wellness Policy is available to the public and the assessment. Submit the name and title of the SFA representative that will oversee this process and ensure compliance.

SFA Response

Finding #6

The correct Civil Rights, non-discrimination statement were not being used on all program materials.

Regulation / Citation Summary

FNS Instruction 113-1 IX A 3 Nondiscrimination Statement. All information materials and sources, including Web sites, used by FNS, State agencies, local agencies, or other subrecipients to inform the public about FNS programs must contain a nondiscrimination statement. It is not required that the nondiscrimination statement be included on every page of the program information Web site. At the minimum, the nondiscrimination statement, or a link to it, must be included on the homepage of the program information.

SFA Suggested Guidance for Compliance

To come into compliance with civil rights requirements, the SFA must submit an assurance to the State Agency that the current non-discrimination statement has been added to all program materials. In addition, the SFA must submit a sample of program materials, such as a menu or letter to households with the statement added to the State Agency.



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SFA Response

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Finding #7

Food Temperatures missing on some days on the production records. The thermometer wasn't calibrated in accordance with HACCP on file.

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

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.

SFA Response

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Technical Assistance Provided

- **Substitutions on the Production records are currently being produced by Sysco and the SFA is making lots of substitutions which is changing the weekly meal pattern and is not in compliance with the weekly totals.**
- **Indicate every item that is served on the PR, including "extras" to get an accurate record of what is being served.**
- **Ensure that the counts for breakfast and afterschool are and actual count on what is being served.**
- **Tracking form for Professional Standards needs to be utilized by the head cook.**

Signature of
Reviewer:

Date: 10/23/17

Signature of
SFA
Representative:

Date: _____

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.