



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

Name of School Food Authority: **Tularosa Municipal Schools**  
School Site(s) reviewed: Tularosa Elementary School

Date of On-Site Review: **October 5, 2017**

Date Corrective Action Plan Was provided to SFA: **November 2, 2017**

**Date your Corrective Action Plan Response is due to NMPED: December 2, 2017**

**COMMENDATIONS**

**PERFORMANCE STANDARD 1**  
Lunch claiming counts are accurately being taken.

**PERFORMANCE STANDARD 2**  
SFA had proper signage in food service area with regard to performance standards 2. Students are also told what is on the menu each morning in the classroom. Offer vs. Serve worked well for the elementary.

**GENERAL AREAS**  
SFA posted most recent food safety inspection reports and USDA Justice For All Poster in visible area. Food Storage was properly kept with food dated appropriately. Potable water was available during breakfast and lunch.

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
- Suggested guidance for the SFA in order to achieve compliance
- The finding, and details specific to the SFA regarding the finding
- SFA area for reply to state how, when and by whom corrections will be made
- The Code of Federal Regulations citation number or alternate resource citation





## New Mexico Public Education Department

Student Success & Wellness Bureau

Administrative Review Corrective Action Plan

### SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all required components are planned, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the day of review with the corrections that were made to the menu to bring it into compliance moving forward.

### SFA Response

### Finding #3

On the day of review, meals counted for reimbursement did not contain all of the required components. The breakfast offered to the K-5 grade group did not contain a fruit. This finding may result in fiscal action due to incomplete meals being counted for reimbursement.

### Technical Assistance Provided

During the review, the components of the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that all required components are offered. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. <http://healthymeals.nal.usda.gov/>

### Regulation / Citation Summary

220.8(c)(2)(ii) Fruits component. Effective July 1, 2014 (SY 2014-2015), schools must offer daily the fruit quantities specified in the breakfast meal pattern in paragraph (c) of this section.

### SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all required components are planned, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the day of review with the corrections that were made to the menu to bring it into compliance moving forward.

### SFA Response



## New Mexico Public Education Department

Student Success & Wellness Bureau

Administrative Review Corrective Action Plan

<b>Finding #4</b>
On the day of review, fluid milk was not available in at least two varieties on all serving lines for breakfast. There was milk available throughout the meal; however, there was only one option.
<b>Technical Assistance Provided</b>
During the on-site review, the fluid milk requirements were discussed with the SFA. The SFA must ensure that fluid milk is offered that is 1% unflavored or nonfat unflavored or flavored. Milk that is above 1% fat content is not allowable for a reimbursable meal. The SFA must provide at least 2 different varieties of milk throughout the meal service.
<b>Regulation / Citation Summary</b>
220.8(d) Fluid milk requirement. A serving of fluid milk as a beverage or on cereal or used in part for each purpose must be offered for breakfasts. Schools must offer students a variety (at least two different options) of fluid milk. Effective July 1, 2012 (SY 2012-2013), all milk must be fat-free or low-fat. Milk with higher fat content is not allowed. Fat-free fluid milk may be flavored or unflavored, and low-fat fluid milk must be unflavored. Low fat or fat-free lactose-free and reduced-lactose fluid milk may also be offered.
<b>SFA Suggested Guidance for Compliance</b>
To come into compliance with the fluid milk requirements, the SFA must provide the State Agency with a written assurance that staff administering the Program 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, along with an indication that corrections have been made at this site, as well as system-wide, in order to bring the menus into compliance. Submit a copy of documentation (milk receipts, labels, menus, or production records) to demonstrate compliance.
<b>SFA Response</b>

<b>Finding #5</b>
The SFA has claimed meals in error based on inaccurate counting and/or claiming procedures. Breakfast is being served in the classroom and attendance is used to submit claim count.
<b>Technical Assistance Provided</b>
During the review, counting and claiming were discussed with the SFA. The SFA has claimed meals in error based on inaccurate counting and/or claiming procedures. To be in compliance, the SFA must ensure that meal counts are being recorded accurately and that claims are being filed correctly. Proper counting and claiming procedures were reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.
<b>Regulation / Citation Summary</b>
210.7(c)(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 authority shall, at a minimum: (iii) Base Claims for Reimbursement on lunch counts, taken daily at the point of service, which correctly identify the number of free, reduced price and paid lunches served to eligible children; (iv) Correctly record, consolidate and report those lunch and supplement counts on the Claim for Reimbursement.
<b>SFA Suggested Guidance for Compliance</b>
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 has corrected inaccurate counting and/or claiming procedures, 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



## New Mexico Public Education Department

Student Success & Wellness Bureau

Administrative Review Corrective Action Plan

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>.

### SFA Response

### Finding # 6

Signage is not posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal for breakfast.

### Technical Assistance Provided

During the review, the importance of signage was discussed with the SFA. The SFA must ensure that signage is posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal.

### Regulation / Citation Summary

220.8(a)(2) Unit pricing. Schools must price each meal as a unit. The price of a reimbursable lunch does not change if the student does not take a food item or requests smaller portions. Schools must identify, near or at the beginning of the serving line(s), the food items that constitute the unit-priced reimbursable school meal(s).

### SFA Suggested Guidance for Compliance

To come into compliance with the meal signage requirements the SFA must state that the proper signage has been posted. Please submit a copy of the signage used and indicate where in the serving line it was posted. Also please note the date that the signage was posted. Include the person by position that will oversee that the signage has been posted and how this person will keep all staff informed that signage is required.

### SFA Response

### Finding # 7

The staff has not been trained on Offer versus Serve when serving breakfast in the classroom.

### Technical Assistance Provided

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. It was determined during the review that the SFA is not offering training on Offer vs. Serve to the cafeteria staff. Offer vs. Serve training found in the School Nutrition Toolbox was discussed with the SFA and completing the training was recommended.

### Regulation / Citation Summary

Offer vs. Serve Guidance Manual (Page 4) Schools are expected to conduct training for cashiers and serving line staff so they can help students select the required food components/food items in the quantities needed for reimbursable lunches and breakfasts. Annual training is required to meet the professional standards requirements.

### SFA Suggested Guidance for Compliance

To come into compliance with the requirements of Offer vs. Serve, the SFA must submit a written statement that training for all kitchen staff will be provided.. In addition the SFA must also



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

provide the name and title of the SFA representative that will ensure compliance with this finding moving forward, an outline of the training that was provided to staff to inform them of the requirements and the date the training was completed.

**SFA Response**

**Finding # 8**

The School Nutrition Program Director did not meet the training requirements, and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements.

**Technical Assistance Provided**

During the on-site review, annual training hour requirements were discussed with the SFA. To be in compliance, the SFA must ensure that the School Nutrition Program Director completes the required amount of training annually. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

**Regulation / Citation Summary**

210.30(b)(3) Continuing education/training standards for all school nutrition program directors. Each school year, the school food authority must ensure that all school nutrition program directors, (including acting directors, at the discretion of the State agency) complete annual continuing education/training. For the school year beginning July 1, 2015, program directors must complete eight hours of annual training. Beginning July 1, 2016, twelve hours of annual training are required. The annual training must include, but is not limited to, administrative practices (including training in application, certification, verification, meal counting, and meal claiming procedures), as applicable, and any other specific topics identified by FNS, as needed, to address Program integrity or other critical issues. Continuing education/training required under this paragraph is in addition to the food safety training required in the first year of employment under paragraph (b)(1)(v) of this section.

**SFA Suggested Guidance for Compliance**

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 the appropriate training is completed and the dates of all future trainings.

**SFA Response**

**Finding # 9**

The SFA is not tracking training hours.

**Technical Assistance Provided**

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



## New Mexico Public Education Department

Student Success & Wellness Bureau

Administrative Review Corrective Action Plan

further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

### 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

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 # 10

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

### Technical Assistance Provided

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.

### 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

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



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

Signature of Reviewer: \_\_\_\_\_ Date: \_\_\_\_\_

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: Laura Henry, Staff Manager/Angelica Ruelas,  
Health Educator  
Student Success & Wellness Bureau  
120 S. Federal Place, Suite 207  
Santa Fe, NM 87501  
Phone: 505-827-1829  
Email: [Laura.Henry@state.nm.us](mailto:Laura.Henry@state.nm.us)**

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.