



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

SFA Name: _____ Walatowa High Charter School
 Administrative Review Conducted on: _____ 4/28/2017
 Site(s) Selected for Review: _____ Walatowa High Charter School

Date Corrective Action Plan was provided to SFA: _____ 5/15/2017
Due Date for Corrective Action Plan: _____ 6/14/2017

The following pages address the findings that were identified during your Administrative Review.

For each finding you will be presented with the following:

- The finding, and details specific to the SFA regarding the finding*
- The Code of Federal Regulations citation number or alternate resource citation*
- A summary of the regulation / requirement*
- 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*

Please provide a detailed response to each finding in the space provided.

Finding #1
410. For the week of menu review, the 9-12 lunch menu did not meet the minimum daily requirement of 2 ounce equivalent meat/meat alternate. A meat/meat alternate was provided, however the minimum required portion size was not met on Wednesday. This is a repeat finding. Fiscal action may apply.
Technical Assistance Provided
During the review, the portion sizes required by 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 at least the minimum portion size is planned for the specific grade group. 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 and Summary

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: 9-12: 2 oz. equivalent meat/meat alternate.

SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide 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 portion sizes planned meet at least the minimum required amount for the specific grade group, 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 week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide the following documentation to support the changes: updated production records to show that at least 2 oz. equivalent of meat/meat alternate will be offered with each meal choice daily. Provide pertaining recipes and nutrition facts labels/CN labels for any added products.

SFA Response

Finding #2

410. For the week of menu review, the 9-12 lunch menu did not meet the minimum daily requirement of 2 ounce equivalent grain. A grain was provided, however the minimum required portion size was not met on four days. Not all grain products served were Whole Grain Rich and creditable towards the grain requirements. This is a repeat finding. Fiscal action may apply.

Technical Assistance Provided

During the review, the portion sizes required by 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 at least the minimum portion size is planned for the specific grade group. 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 and Summary

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: 9-12: 2 oz. equivalent daily grain.

SFA Suggested Guidance for Compliance
<p>To come into compliance with meal pattern requirements, the SFA must provide 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 portion sizes planned meet at least the minimum required amount for the specific grade group, 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 week of review with the corrections that were made to the menu to bring it into compliance moving forward. labels for the added product/s. Provide the following documentation to support the changes: updated production records to show that at least 2 oz. equivalent of Whole Grain Rich grain products will be offered with each meal choice daily. Provide pertaining nutrition facts labels for any added products.</p>
SFA Response

Finding #3
<p>410. For the week of menu review, the 9-12 lunch menu did not meet the minimum weekly requirement of 10 ounce equivalent grain. This is a repeat finding. Fiscal action may apply.</p>
Technical Assistance Provided
<p>During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement meet the weekly requirements as well as the daily requirements for grains required for the specific grade group. The SFA should review all menus to ensure that at least the minimum daily and weekly requirement is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include how to determine the total number of weekly servings if there are multiple menu items each day. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/</p>
Regulation / Citation and Summary
<p>210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: 9-12: minimum of 10 oz. equivalent of grains per week.</p>
SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide 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 weekly requirements for grains are met for the specific grade group, 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 week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

SFA Response

Finding #4

410. For the week of menu review, the 9-12 lunch menu did not meet the 100% Whole Grain Rich requirement for grains. Not all grains served were Whole Grain Rich. The following menu items were not Whole Grain Rich: Hoagie Bun, Corn Tortilla, and Wheat Crackers. This is a repeat finding.

Technical Assistance Provided

During the review requirements for the meal pattern were reviewed with the SFA. All grains provided as part of the reimbursable meal must be Whole Grain Rich. To be considered Whole Grain Rich the item it must be comprised of at least 50% whole grain ingredients. An easy way to determine if a pre-purchased item is whole grain is to look at the ingredient list. If the first ingredient is whole grain, it is a Whole Grain Rich product. If the first ingredient is water, but the second is a whole grain it is also a Whole Grain Rich product. If the SFA is using a recipe as long as the whole grain ingredient is the largest by weight of all of the grain ingredients combined it is a Whole Grain Rich product. For additional information on whole grains visit the USDA FNS website. <http://healthymeals.nal.usda.gov/menu-planning/whole-grains>

Regulation / Citation and Summary

220.8(c)(2)(iv) Grains component. (A) Enriched and whole grains. All grains must be made with enriched and whole grain meal or flour, in accordance with the most recent FNS guidance on grains. Whole grain-rich products must contain at least 50 percent whole grains and the remaining grains in the product must be enriched.

SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance with the Whole Grain Rich requirements. The plan should include; a statement that only Whole Grain Rich grain products will be used as part of the reimbursable meal, a statement that all labels/recipes/manufacture statements will be kept on file to document the Whole Grain Rich compliance, and a statement that additional menu training will be provided to SFA staff. Provide the outline for the training and the dates that the training(s) will be completed. In the plan include the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. In addition to the plan please submit a revised menu from the week of review that clearly identifies the products that have been changed to bring the menu into compliance, submit any needed supporting documentation such as labels, recipes, and/or manufacturer statements.

SFA Response

Finding #5

410. For the week of menu review, the 9-12 lunch menu did not meet the minimum daily requirement of 1 cup vegetable. Vegetables were provided, however the minimum required portion size was not met on Wednesday. This is a repeat finding. Fiscal action may apply.

Technical Assistance Provided

During the review, the portion sizes required by 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 at least the minimum portion size is planned for the specific grade group. 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 and Summary

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: 9-12: 1 cup of creditable vegetable.

SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide 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 portion sizes planned meet at least the minimum required amount for the specific grade group, 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 week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide the following documentation to support the changes: updated production records showing that at least 1 cup of creditable vegetables will be offered daily.

SFA Response

Finding #6

410. For the week of menu review, the 9-12 lunch menu did not meet the minimum weekly requirement of 1 1/4 cup red/orange vegetable subgroup.

Technical Assistance Provided

During the review, the portion sizes required by 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. This includes meeting the weekly requirements for the vegetables sub-groups. Over the course of the standard school week the SFA must at a minimum meet the required servings for each sub-group. The SFA should review all menus to ensure that at least the minimum serving for each sub-group is planned for the specific grade group. 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 and Summary

210.10(c)(iii) Vegetables component. Vegetable offerings at lunch over the course of the week must include the vegetable subgroups, as defined in this section in the quantities specified in the meal pattern in paragraph (c) of this section: 9-12: 1 and 1/4 C red/orange.

SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide 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 weekly requirements for vegetable subgroups are met for the specific grade group, 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 week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide the following documentation to support the changes: updated production records to show that at least 1/8 cup of red/orange vegetables were added to the menu this week, to total 1 1/4 cup for the week.

SFA Response

Finding #7

800. The SFA is using the incorrect civil rights statement. They are using an outdated version of the statement on the Public Release and notification letter sent home to parents. This is a repeat finding.

Technical Assistance Provided

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.

Regulation / Citation and 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 written assurance 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 as part of the corrective action.

SFA Response

Finding #8
<p>The SFA is not tracking training hours so there is no way to determine if professional standard training hours have been completed for the director, manager, full time staff, new staff, and non-nutrition staff personnel.</p>
Technical Assistance Provided
<p>During the on-site review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that the School Nutrition staff complete the required amount of training annually. In addition, 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.</p>
Regulation / Citation and Summary
<p>210.30(d) Continuing education/training standards for all staff with responsibility for school nutrition programs. Each school year, the school food authority must ensure that all staff with responsibility for school nutrition programs that work an average of at least 20 hours per week, other than school nutrition program directors and managers, completes annual training in areas applicable to their job. Beginning July 1, 2016, six hours of annual training are required. Part-time staff working an average of less than 20 hours per week must complete four hours of annual training beginning July 1, 2015.</p> <p>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.</p> <p>210.30(c) Continuing education/training standards for all school nutrition program managers. Each school year, the school food authority must ensure that all school nutrition program managers have completed annual continuing education/training. Beginning July 1, 2016, ten hours of annual training are required.</p>
SFA Suggested Guidance for Compliance
<p>To come into compliance with the requirements for Professional Standards, the SFA must provide written assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Include the training that will take place for each employee to meet the requirement. Also include the method that will be used to track all training hours. Please submit the written assurance, the plan for trainings and a sample of the tracking method that will be used, as corrective action.</p>
SFA Response

Finding #9
<p>1400. The SFA does not have a food safety plan. This is a repeat finding.</p>
Technical Assistance Provided
<p>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.</p>

Regulation / Citation and Summary
<p>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.</p>
SFA Suggested Guidance for Compliance
<p>To come into compliance with the requirements for food safety, the SFA must provide written 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 and that the food safety plan will be available at each site within the SFA. In addition to the assurance an electronic copy of the Standard Operating Procedures for delivery of the meals, keeping temperature logs and hand washing must be submitted for review.</p>
SFA Response

Finding #10
<p>1404. The SFA did not request two health inspections for each school year.</p>
Technical Assistance Provided
<p>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.</p>
Regulation / Citation and Summary
<p>210.13(b) Food safety inspections. Schools shall obtain a minimum of two food safety inspections during each school year conducted by a State or local governmental agency responsible for food safety inspections. Sites participating in more than one child nutrition program shall only be required to obtain two food safety inspections per school year if the nutrition programs offered use the same facilities for the production and service of meals.</p>
SFA Suggested Guidance for Compliance
<p>To come into compliance with the requirements for food safety, the SFA must provide written assurance that the appropriate staff understand these requirements, and that moving forward the SFA will annually request that two inspections be completed. Please a copy of request for the two inspections along with the written assurance, as corrective action.</p>

SFA Response

Finding #11
704. The SFA had an excess of three months' average expenditures in its year-end net cash resources.
Technical Assistance Provided
Three-month average expenses were \$8,935.02 (total expenditures of \$26,805.05 divided by 9 months, multiplied by 3 months), and the ending net cash resources were \$18,862.42, resulting in an excess balance of \$7,942.63. The SFA is currently not charging the food service labor expenses to Fund 21000. Charging the allowable food service wages and benefits would reduce the excess. If this causes the food service program to operate at a loss, the operational fund can make transfers into Fund 21000 to support the program and zero out any negative balance.
Regulation / Citation and Summary
7 CFR 210.14 (b) Net cash resources. The school food authority shall limit its net cash resources to an amount that does not exceed 3 months' average expenditures for its nonprofit school food service or such other amount as may be approved by the State agency in accordance with §210.19(a).
SFA Suggested Guidance for Compliance
As the corrective action response, please explain how you will lower the nonprofit school food service net cash resource balance to a level at or below 3 months' average expenditures. Additionally, explain the internal controls that have been put into place to ensure that the food service net cash resource balance will remain under 3-months' average expenses or prior approval will be received from the State Agency if an excess balance is expected.
SFA Response

Signature of Reviewer: Debbie Hawkins

Date: 4/28/17

Signature of SFA Representative: _____

Date: _____

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



Administrative Review Team

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Please insert your detailed responses, save, print, sign, scan and upload the signed copy to cnrsupport.com by the due date indicated. Thank you.