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Christopher N. Ruskowski Susana Martinez
Secretary of Education Governor

Administrative Review Summary and Corrective Actions

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|-------------------------------------|----------------------------------|
| SFA Name: | Cloudcroft Municipal Schools |
| SFA Code/ ID Number: | 48000 |
| Administrative Review Conducted on: | Tuesday, February 27, 2018 |
| SFA Contact Name and Title: | Ardia Gray/Food Service Director |
| CNR Reviewer: | Debbie Hawkins |

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on February 27, 2018; an exit conference summarizing the findings took place on the same day.

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 (Review) require a written response and must be submitted in writing to CN Resource, by **Wednesday, April 11, 2018**. 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 **Wednesday, April 11, 2018**.

Thank you,



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

CN Resource
1930 N Arboleda, 101, Mesa, Arizona 85213
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Administrative Review Technical Assistance Summary

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|-------------------------------------|----------------------------------|
| SFA Name: | Cloudcroft Municipal Schools |
| SFA Code/ID Number: | 48000 |
| Administrative Review Conducted on: | Tuesday, February 27, 2018 |
| SFA Contact Name and title: | Ardia Gray/Food Service Director |
| CNR Reviewer: | Debbie Hawkins |

Commendations & Suggestions

Outstanding job meeting all of the requirements for breakfast and lunch. All daily and weekly meal component and food quantity requirements were met for the week of menu review.

It was very evident that the food service staff enjoy their jobs and enjoy the students and are able to call them by name.

The food was fresh and delicious, thank you for taking such care to feed the children.

Thank you for being prepared and organized for the review. It made it easy to review all the required documentation.

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

Hearing Official - technical assistance was provided as a reminder that the hearing official should not have any part in processing the applications.

Civil Rights - technical assistance was providing civil rights training. Any staff member that has duties related to the child nutrition programs should receive civil rights training each year, along with program staff.

Wellness Policy - technical assistance was provided regarding assessing the wellness policy on a triennial basis. It is due for assessment this year.

Extended Eligibility - technical assistance was provided regarding accurately documenting extended eligibility for students who reside in the same household as someone that comes up as a match on a Direct Certification list.



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

SFA Name: Cloudcroft Municipal Schools
 SFA Code/ID: 48000

Administrative Review Conducted: Tuesday, February 27, 2018
 Site(s) Selected for Review: Cloudcroft High School
0
0

Date Corrective Action Plan was provided to SFA: 3/12/2018

Due Date for Corrective Action Plan: 4/11/2018

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 | | | |
|---|--------------|------------------|--------|
| The SFA sold nonprogram foods, but did not determine compliance with nonprogram food requirements. | | | |
| Technical Assistance | | | |
| The SFA submitted an incomplete USDA NonProgram Food Revenue Tool. The "Cost of Nonprogram Food" and "Total Nonprogram Food Revenue" cells were left blank, therefore the tool did not determine compliance. You can use a 5-day reference period to complete the tool. This tool should include adult/staff meals, a la carte, extra milks, and extra entrees/sides 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. An additional CN Resource excel workbook was sent to the SFA to help complete the USDA tool. | | | |
| For detailed regulation see: 210.14(f) Revenue from nonprogram foods. | | | |
| Required SFA Response | SFA Response | CNR Internal Use | |
| | | Appv. | Intls. |
| 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. | | | |
| 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |
| 3. Provide written assurance that the SFA has received a copy of USDA memo SP 20-2016 on nonprogram foods. | | | |

| | | | |
|---|--|--|--|
| <p>4. 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 #2: 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. This is a repeat finding from the previous Administrative Review. Adult meals should be priced at least at the student price plus per-meal USDA reimbursements and the value of commodities received. The SFA should be charging at least \$3.38 (\$2.75 student price + \$.39 USDA reimbursement + \$.2325 commodities). The SFA's adult lunch price of \$3.00 is not meeting this requirement. The SFA should increase adult meal prices to an appropriate level.

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. |
| <p>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.</p> | | | |
| <p>2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.</p> | | | |
| <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> | | | |

Finding #3: 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 #4: SFSP Outreach

The SFA has not performed SFSP outreach.

Technical Assistance

It was determined during the review that the SFA has not performed SFSP outreach. The SFA must perform SFSP outreach before the end of the school year. Methods of outreach such as posting SFSP information on the SFA's website, parent newsletters and district-wide emails were discussed with the SFA. Schools may fulfill this requirement through Robo calls, flyers or other methods that notify the community of locations of summer meal sites. Methods to locate sites that serve free meals to children during the summer include the following:

- Call 211
- Call 1.866.3Hungry or 1.877.8Hambre
- Visit the website: www.fns.usda.gov/summerfoodrocks (note, this replaces the whyhungry.org website)
- Use the site locator for smartphones - Rangeapp.org

For detailed regulation see: 210.12(d) Outreach activities. (2)

| 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 will cooperate with Summer Food Service Program sponsors to conduct outreach on the availability of the Summer Food Service Program. | | | |

Finding #5: Certification and Benefit Issuance

Not all selected applications were approved correctly. The SFA did not base its determination on all sources of income listed on the application and three were miscategorized.

Technical Assistance

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: 245.6(c)(4) Application, eligibility and certification of children for free and reduced price meals and free milk

| 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. Provide copies of each of the corrected applications, with the date corrected indicated, and letters to the household(s) if there is a change in eligibility status. | | | |

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: _____
 Signature of CN Resource Reviewer: Debbie Hawkins

Date: _____
 Date: February 27, 2018

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



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>