



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

Name of School Food Authority:	Clovis Municipal Schools
School Site(s) reviewed:	Sandia Elementary Yucca Middle School Clovis High School
Date of On-Site Review:	Date: February 21 - 22, 2018

Date Corrective Action Plan Was provided to SFA:	Date: March 20, 2018
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Date your Corrective Action Plan Response is due to NMPED:	Due Date: April 20, 2018
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COMMENDATIONS

PERFORMANCE STANDARD 1
SFA used a electronic POS system at the High School.
SFA showed proper procedures when establishing base year for Provision 2 and CEP provision.

PERFORMANCE STANDARD 2
SFA had all meal components offered on day of review.
SFA had production records for breakfast and lunch filled out correctly.

GENERAL AREAS
SFA had health inspection and food permits on site and up to date.
SFA had proper nondiscrimination statement posted at the serving area.

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
The SFA does not have a reliable counting/claiming system at Yucca Middle School and Sandia Elementary School.
Technical Assistance Provided
During the review, claiming was discussed with the SFA. The SFA is claiming ineligible meals for reimbursement. To be in compliance, the SFA must ensure that no ineligible meals are claimed for reimbursement. Maintaining an accurate edit check and how to evaluate an edit check for accuracy was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.
Regulation / Citation Summary
210.7(c)(1)(v) The SFA shall ensure that Claims for Reimbursement do not request payment for any excess lunches produced, as prohibited in §210.10(a)(2), or non-Program lunches (i.e., a la carte or adult lunches) or for more than one meal supplement per child per day.
SFA Suggested Guidance for Compliance
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 is no longer claiming ineligible meals for reimbursement, 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 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



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Finding #2
<p>The point of service did not provide an accurate meal count by eligibility status. This is a systemic error. There was no set meal counting system, or any way of knowing how many meals are being served at Yucca Middle School</p>
Technical Assistance Provided
<p>During the review, an accurate point of service was discussed with the SFA. The point of service does not provide an accurate meal count by eligibility status. This is a systemic error. To be in compliance, the SFA must ensure that meal counts taken at the point of service correctly identify the number of free, reduced priced and paid lunches served. Tracking students accurately at the point of service was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.</p>
Regulation / Citation Summary
<p>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.</p>
SFA Suggested Guidance for Compliance
<p>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 will advise the State Agency that the systemic error has been corrected, 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 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.</p>
SFA Response



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Finding #3
<p>Meal count totals by category have not been combined or recorded correctly. This is a systemic error. There are no meal counts manager states she guesses the meal count based on total items left for lunch at Yucca Middle School.</p>
Technical Assistance Provided
<p>During the review, claiming was discussed with the SFA. Meal count totals b category have not been combined or recorded correctly. This is a non-systemic error. To be in compliance, the SFA must ensure that meal counts are being recorded accurately. Consolidating meal counts by category was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.</p>
Regulation / Citation Summary
<p>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.</p>
SFA Suggested Guidance for Compliance
<p>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 is now combining or recording meal count totals by category correctly, 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 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.</p>
SFA Response



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Finding #4
<p>On the day of review, meals counted for reimbursement did not contain all of the required components. The lunch offered to the K-8 grade group did not contain a fruit for most of meals taken. This finding may result in fiscal action due to incomplete meals being counted for reimbursement.</p>
Technical Assistance Provided
<p>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/</p>
Regulation / Citation Summary
<p>210.10(c)(2)(ii) Fruits component. Schools must offer fruits daily as part of the lunch menu. Fruits that are fresh; frozen without added sugar; canned in light syrup, water or fruit juice; or dried may be offered to meet the requirements of this paragraph. All fruits are credited based on their volume as served, except that 1/4 cup of dried fruit counts as 1/2 cup of fruit. Only pasteurized, full-strength fruit juice may be used, and may be credited to meet no more than one-half of the fruits component.</p>
SFA Suggested Guidance for Compliance
<p>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.</p>
SFA Response



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Finding #5
The cafeteria staff has not been trained on Offer versus Serve.
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. Ongoing 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 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



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Finding #6

For the menu review week, all meal choices did not have all required meal components available. The lunch menu offered to the 9-12 grade groups did not contain a grain. 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

210.10(c)(2) Schools must offer students in each age/grade group the food components specified. (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 grains FNS guidance. 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 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 week of review with the corrections that were made to the menu to bring it into compliance moving forward.

SFA Response



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Finding #7

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.

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 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

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 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 any needed documentation to support the changes such as labels, recipes, production records, etc.

SFA Response



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Finding #8
Storage violations were observed on-site. The SFA had food that was not dated upon delivery.
Technical Assistance Provided
During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated upon delivery.
Regulation / Citation Summary
210.13(a) Health standards. The school food authority shall ensure that food storage, preparation and service is in accordance with the sanitation and health standards established under State and local law and regulations. 210.13(d) (d) Storage. The school food authority shall ensure that the necessary facilities for storage, preparation and service of food are maintained. Facilities for the handling, storage, and distribution of purchased and donated foods shall be such as to properly safeguard against theft, spoilage and other loss.
SFA Suggested Guidance for Compliance
To come into compliance with this finding the SFA must submit an assurance that the SFA is aware of the requirements for food storage and holding within the food safety guidelines. The assurance must include: a statement that all food and chemicals will be kept separately; a statement that all food items will be dated with the delivery date as well as the date the product was opened; a statement that all food will be stored at least 6 inches off of the floor; and a statement that all storage areas including coolers, freezers and storage rooms will be kept within the allowable temperature ranges. The assurance should also include a statement that temperature logs will be maintained for all storage areas. Submit copies of completed temperature logs with the corrective action response.
SFA Response



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Finding #9
Storage violations were observed on-site. The SFA had food that was not stored 6 inches off the floor
Technical Assistance Provided
During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is stored at least 6 inches off the floor.
Regulation / Citation Summary
210.13(a) Health standards. The school food authority shall ensure that food storage, preparation and service is in accordance with the sanitation and health standards established under State and local law and regulations. 210.13(d) (d) Storage. The school food authority shall ensure that the necessary facilities for storage, preparation and service of food are maintained. Facilities for the handling, storage, and distribution of purchased and donated foods shall be such as to properly safeguard against theft, spoilage and other loss.
SFA Suggested Guidance for Compliance
To come into compliance with this finding the SFA must submit an assurance that the SFA is aware of the requirements for food storage and holding within the food safety guidelines. The assurance must include: a statement that all food and chemicals will be kept separately; a statement that all food items will be dated with the delivery date as well as the date the product was opened; a statement that all food will be stored at least 6 inches off of the floor; and a statement that all storage areas including coolers, freezers and storage rooms will be kept within the allowable temperature ranges. The assurance should also include a statement that temperature logs will be maintained for all storage areas. Submit copies of completed temperature logs with the corrective action response.
SFA Response



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Finding #10
Storage violations were observed on-site. The SFA had food that was opened and not dated with date opened.
Technical Assistance Provided
During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated once opened.
Regulation / Citation Summary
210.13(a) Health standards. The school food authority shall ensure that food storage, preparation and service is in accordance with the sanitation and health standards established under State and local law and regulations. 210.13(d) (d) Storage. The school food authority shall ensure that the necessary facilities for storage, preparation and service of food are maintained. Facilities for the handling, storage, and distribution of purchased and donated foods shall be such as to properly safeguard against theft, spoilage and other loss.
SFA Suggested Guidance for Compliance
To come into compliance with this finding the SFA must submit an assurance that the SFA is aware of the requirements for food storage and holding within the food safety guidelines. The assurance must include: a statement that all food and chemicals will be kept separately; a statement that all food items will be dated with the delivery date as well as the date the product was opened; a statement that all food will be stored at least 6 inches off of the floor; and a statement that all storage areas including coolers, freezers and storage rooms will be kept within the allowable temperature ranges. The assurance should also include a statement that temperature logs will be maintained for all storage areas. Submit copies of completed temperature logs with the corrective action response.
SFA Response



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Finding #11
Snack counts by category for the review period are not reasonable compared to snack counts for the day of review. The snack counts were not matching the claim or day count.
Technical Assistance Provided
During the review, the requirements for properly counting and claiming snacks were discussed with the SFA. The SFA must take and maintain accurate snack meal counts. This finding may result in fiscal action.
Regulation / Citation Summary
Afterschool Snacks in the National School Lunch Program (NSLP) and the At-Risk Component of the Child and Adult Care Food Program (CACFP), Questions and Answers, Edition 3: Accurate meal count records must be maintained.
SFA Suggested Guidance for Compliance
To come into compliance with the requirement to count and maintain accurate snack meal counts, the SFA must provide an assurance that staff administering the Afterschool Care Snack Program understands this requirement, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan. Additionally, the SFA must provide an explanation for why the meal counts for the day of review are not reasonable as compared to snack counts from the month of review. Training for all afterschool snack program 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 State Agency will determine the correct number of snacks that may be claimed for the review period and the day of review.
SFA Response

Other areas of Technical Assistance (NOT requiring Corrective Action)

- Hairnets must always be worn when working in a kitchen environment.
- Gloves must always be worn when handling RTE Foods.
- At Yucca Middle school the OVS poster was asked to be moved from the hallway to the serving line.
- At Yucca Middle school the Civil Rights poster was asked to be moved from the hallway to the serving line.
- TA was given at Yucca Middle school that students should not be allowed to put food back after being handled.
- TA was given at the high school that veggies should be added to the pizza tray to make the tray reimbursable.

