



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

Name of School Food Authority:	SFA Corona Public Schools
School Site(s) reviewed:	Sites Reviewed Corona High School
Date of On-Site Review:	Date February 1, 2018
Date Corrective Action Plan Was provided to SFA:	Date April 9, 2018
Date your Corrective Action Plan Response is due to NMPED:	Due Date: May 10, 2018

COMMENDATIONS

PERFORMANCE STANDARD 1
SFA submitted FNS-742 in a timely manner.
SFA maintained P2 documentation and household applications.

PERFORMANCE STANDARD 2
SFA had list of students with special dietary needs and accommodates those students.
All food storage properly maintained and labeled.

GENERAL AREAS
Civil Rights poster posted in visible area.
Wellness Policy was approved by the States Wellness Coordinator.
Potable water is made available to all students in dining area.

Other areas of Technical Assistance (NOT requiring Corrective Action)

- **Provided TA on the implementation of Offer vs. Serve and the benefits of it.**
- **Provided guidance and information on the BuyAmerican provision.**

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



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- 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

Please provide a detailed response to each finding in the spaces provided

Finding #1
On the day of review, all required components were not available to all students prior to lunch service. The SFA did not have enough milk for students and was able to go to the store to purchase more milk before the meal service, however the milk purchased was whole milk and that does not meet the meal pattern requirements.
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 consider providing additional signage and training to students to make sure they know what is required for a reimbursable meal. The SFA should also provide additional training to the point of service staff on the requirements of a reimbursable meal. 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) Food components. Schools must offer students in each age/grade group the food components specified: fruits, vegetables, meats/meat alternates, grains, and fluid milk.
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 #2
On the day of review, fluid milk was not available in at least two varieties on all serving lines for lunch. There was milk available throughout the meal, however there was only one option.
Technical Assistance Provided
During the review, the fluid milk requirements were discussed with the SFA. The SFA must ensure that fluid milk is available in at least two varieties on all serving lines. The milk varieties could be flavor, fat content, lactose free, etc. The SFA must ensure that they have enough of



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each variety to last though the entire meal service, the last student through the line should still have a varieties of milk to select from.

Regulation / Citation Summary

210.10(d) Fluid milk requirement—(1) Types of fluid milk. (i) Schools must offer students a variety (at least two different options) of fluid milk. 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.

SFA Suggested Guidance for Compliance

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.

SFA Response

Finding #3

On the day of review, fluid milk was offered at lunch that was not 1% white or nonfat white/flavored. Whole milk was purchased at the local store and poured in cups.

Technical Assistance Provided

During the review, the fluid milk requirements were discussed with the SFA. The SFA must ensure that fluid milk is available in at least two varieties on all serving lines. The milk varieties could be flavor, fat content, lactose free, etc. The SFA must ensure that they have enough of each variety to last through the entire meal service, the last student through the line should still have a varieties of milk to select from.

Regulation / Citation Summary

210.10(d) Fluid milk requirement—(1) Types of fluid milk. (i) Schools must offer students a variety (at least two different options) of fluid milk. 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.

SFA Suggested Guidance for Compliance

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.

SFA Response



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Finding #4
On the day of review, the SFA provided milk substitutions during lunch service that were not allowable. Whole milk was offered.
Technical Assistance Provided
During the on-site review, milk substitutes were discussed with the SFA. The SFA must ensure that any substitute provided in place of fluid milk meets the nutrition requirements in 7 CFR 210.10(d)(1). The milk substitutes must meet or exceed the amount set by USDA for the following nutrients: Calcium, Protein, Vitamin A, Vitamin D, Magnesium, Phosphorus, Potassium, Riboflavin, and Vitamin B-12.
Regulation / Citation Summary
210.10(d)(3) Fluid milk substitutes. If a school chooses to offer one or more substitutes for fluid milk for non-disabled students with medical or special dietary needs, the nondairy beverage(s) must provide the nutrients listed in this section.
SFA Suggested Guidance for Compliance
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.
SFA Response

Finding #5
For the menu review week, all meal choices did not have all required meal components available. The lunch menu offered to the K-8 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
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.
SFA Suggested Guidance for Compliance



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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

Finding #6

For the menu review week, all meal choices did not have all required meal components available. The lunch menu offered to the K-8 grade group 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 review the lunch menu offered to the K-8 grade group did not meet the minimum weekly red/orange vegetable requirement to include at least $\frac{3}{4}$ cup red/orange vegetable per week for grades K-8.

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 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: K-8: $\frac{3}{4}$ C red/orange.

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 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

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Finding # 8

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily requirement of 1 cup fruit. Fruit 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: 1 cup of fruit.

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

Finding # 9

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



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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)(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

The school must modify the lunch menu to include at least 1 ¼ cup red/orange vegetable per week for grades 9-12. The school must provide the State Agency with a copy of the updated menu.

SFA Response

Finding # 10
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
The school must modify the lunch menu to include at least two grain equivalents with each menu option daily for grades 9-12. The school must provide the State Agency with a copy of the updated menu.
SFA Response



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Finding # 11
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.
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 meat/meat alternate.
SFA Suggested Guidance for Compliance
The school must modify the lunch menu to include at least two meat/meat alternate equivalents with each menu option daily for grades 9-12. The school must provide the State Agency with a copy of the updated menu.
SFA Response

Finding # 12
For the week of menu review, the 9-12 lunch menu did not meet the minimum weekly requirement of 8 ounce equivalent grain.
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 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/
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: minimum of 10 oz. equivalent of grains per week.



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SFA Suggested Guidance for Compliance

The school must modify the lunch menu to include at least 8 grain equivalents per week for grades 9-12. The school must provide the State Agency with a copy of the updated menu.

SFA Response

Finding # 13

For the week of menu review, the 9-12 lunch menu did not meet the minimum weekly requirement of 8 ounce equivalent meat/meat alternate.

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 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/>

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: minimum of 10 oz. equivalent of meat/meat alternate per week.

SFA Suggested Guidance for Compliance

The school must modify the lunch menu to include at least 8 meat/meat alternate equivalents per week for grades 9-12. The school must provide the State Agency with a copy of the updated menu.

SFA Response

Finding # 14

For the week of menu review, the 9-12 lunch menu did not meet the minimum weekly requirement of 4 cups of fruit.

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 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



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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/>

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: minimum of 4 cups equivalent of fruit per week.

SFA Suggested Guidance for Compliance

The school must modify the lunch menu to include at least 4 cups of fruit per week for grades 9-12. The school must provide the State Agency with a copy of the updated menu.

SFA Response

Finding # 15

For the week of menu review, the K-8 lunch menu did not meet the minimum daily requirement of 1 ounce equivalent grain on two of the days. 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: K-8: 1 oz. equivalent daily grain.

SFA Suggested Guidance for Compliance

The school must modify the lunch menu to include at least one grain equivalents with each menu option daily for grades K-8. The school must provide the State Agency with a copy of the updated menu.

SFA Response



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Finding # 16

For the week of menu review, the K-8 lunch menu did not meet the minimum daily requirement of 1/2 cup fruit. Fruit was provided, however the minimum required portion size was not met on two days.

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: K-8: 1/2 cup of fruit.

SFA Suggested Guidance for Compliance

The school must modify the lunch menu to include at least 1/2 cup of fruit with each menu option daily for grades K-8. The school must provide the State Agency with a copy of the updated menu.

SFA Response

Finding # 17

For the menu review week, the K-8 breakfast menu did not meet the 100% Whole Grain Rich requirement. Not all grains provided were Whole Grain Rich.

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 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. Effective July 1, 2013 (SY 2013-2014), schools may substitute meats/meat alternates for grains, after the daily grains requirement is met, to meet the weekly grains requirement. One ounce equivalent of meat/meat alternate is equivalent to one ounce equivalent of grains.



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SFA Suggested Guidance for Compliance

The school must review all grain products offered to ensure that they are whole grain rich. The school must provide the State Agency with a whole grain label for the assorted donuts.

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 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/manufacturer 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 # 18

Based on the targeted menu review, the menu for grade group 9-12 did not meet the dietary specification for calories for lunch.

Technical Assistance Provided

During the review, appropriate calorie ranges were discussed with the SFA (Handout was provided with meal pattern requirements). Meeting the calorie ranges is required to ensure that all menus are in compliance with dietary specifications. The calorie requirements for lunch are: K-5: 550-650, 6-8: 600-700, 9-12: 750-850.

Regulation / Citation Summary

210.10(f) Dietary specifications—(1) Calories. School lunches offered to each age/grade group must meet, on average over the school week, the minimum and maximum calorie levels specified: K-5: 550-650, 6-8: 600-700, 9-12: 750-850.

SFA Suggested Guidance for Compliance

The school must modify recipes and provide the correct portion sizes for grades 9-12.

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, at a minimum the required serving size for the specific grade group will be met for each component, the average weekly calories will fall within the USDA established range for the specific grade group, that the weekly menu will not exceed the USDA established sodium restriction for the specific grade group, that the weekly menu will provide no more than 10% Saturated Fat, and that all products and ingredients used to prepare school meals will contain zero grams of trans fats. 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. Submit any additional information that is needed to



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demonstrate compliance such as production records, recipes, labels, or Child Nutrition labels.

SFA Response

Finding # 19

Offer versus Serve is not being implemented correctly. Some meals were incomplete due to insufficient quantities offered. Separate portions are not planned or offered for grades K-8 and 9-12 at lunch. Grades K-12 are offered the same portion serving sizes for all menu components.

Technical Assistance Provided

Requirements under Offer vs. Serve include that the SFA must offer the five food components specified in the meal pattern, and students must be allowed the option to deny two items, except that they must take at least a 1/2 cup of either the fruit or vegetable component or 1/2 cup combination of fruit and vegetable. During the review, it was determined that the SFA is not following these requirements. The requirement as well as examples of the findings and possible solutions were reviewed with the SFA.

Regulation / Citation Summary

210.10 (e) Offer versus serve. School lunches must offer daily the five food components specified in the meal pattern in paragraph (c) of this section. Under offer versus serve, students must be allowed to decline two items at lunch, except that the students must select at least 1/2 cup of either the fruit or vegetable component. Senior high schools (as defined by the State educational agency) must participate in offer versus serve. Schools below the senior high level may participate in offer versus serve at the discretion of the school food authority.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements of Offer vs. Serve, the SFA must submit a written process that has been put in to place to ensure Offer vs Serve is now being implemented correctly at the high school. In addition to the new process 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 new process and the date the training was completed.

SFA Response

Finding # 20

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. 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.



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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

Finding # 21

Production records do not demonstrate that the components and planned portion sizes met the meal pattern requirements on each day of the review period. Separate production records are not maintained for grades K-8 and 9-12.

Technical Assistance Provided

During the review, production record, component, and portion size requirements were discussed with the SFA. The SFA must complete production records and serve snacks as described in 7 CFR 210.10(a)(3) and 7 CFR 210.10(o)(2). How to review nutrition labels, ingredient labels, CN labels, and use the food buying guide was discussed for meal pattern compliance. This finding may result in fiscal action.

Regulation / Citation Summary

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.

SFA Suggested Guidance for Compliance

Separate production records must be maintained for grades K-8 and 9-12. Please provide the state agency a copy of the separate production records.
Submit a copy of the completed sign in sheet and agenda for the training along with the date that the training was completed.

SFA Response



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Finding # 22
The SFA is not implementing their food safety plan by not maintaining calibration logs.
Technical Assistance Provided
Pointed out thermometer calibration log on page 84 of the SFAs HACCP Plan. During the review, the food safety plan was discussed with the SFA. The SFA must have a food safety plan that complies with the requirements as outlined in 7 CFR 210.13(c), and the SFA must ensure that all elements of the plan are implemented. The SFA should be following the procedures as outlined in the plan and maintaining all required records.
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 implementing the food safety plan. 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, and that training will be completed for all appropriate SFA staff. Provide the agenda and sign-in sheets from the trainings.
SFA Response



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Signature of Reviewer: _____ Date: _____

Signature of SFA Representative: _____ Date: _____

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

Name of Reviewer: Name
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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.