

Student Success & Wellness Bureau
Administrative Review Corrective Action Plan

Name of School Food Authority:	SFA Dora Consolidated Schools	

School Site(s) reviewed: Sites Reviewed

Dora High

Date of On-Site Review: Date 2/22/18

Date Corrective Action Plan

Was provided to SFA:

Date 4/11/18

Date your Corrective Action Plan Response is due to NMPED:

Due Date 5/12/18

COMMENDATIONS

PERFORMANCE STANDARD 1

All household notification letters of eligibility were available and had all required components.

Use of Direct Certification and Benefit Issuance list.

Meals accurately consolidated and claimed.

PERFORMANCE STANDARD 2

Offer versus serve being implemented correctly.

Salad bar looked great and students seemed to like it a lot.

GENERAL AREAS

On-site monitoring form completed. Recordkeeping maintained for 3 years.

The SFAs Wellness Policy met all requirements.

Potable water available.

Other areas of Technical Assistance (NOT requiring Corrective Action)

- Cafeteria had salt packets out for students to grab. Let Food Service Director (FSD) additional salt should not be placed out in condiment or salad bar area.
- Reminded FSD that all food in storage needs to be dated. Some foods were dated but more recent delivery was not.
- Menus must be posted in cafeteria for students to see.
- Old Civil Rights poster posted. Emailed new green poster and school will print out in the poster size to post.
- School must track all program related trainings for each staff on a tracking sheet on a yearly basis.



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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

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

Finding #1

The applications subject to verification were not properly selected in accordance with the alternate sample size option used, as the SFA did not verify the correct number of applications. Applications chosen for verification were selected by closing eyes and pointing. Error Prone applications were not selected.

Technical Assistance Provided

During the review, verifying the correct number of applications was discussed with the SFA. The SFA must choose the number of applications to review in accord with the process outlined in the Eligibility Manual for School Meals, Chapter 4. Gave school a copy of the eligibility manual for school meals.

Regulation / Citation Summary

245.6a(c)(3) Standard sample size. Unless eligible for an alternative sample size under paragraph (d) of this section, the sample size for each local educational agency shall equal the lesser of: (i) Three (3) percent of all applications approved by the local educational agency for the school year, as of October 1 of the school year, selected from error prone applications; or (ii) 3,000 error prone applications approved by the local educational agency for the school year, as of October 1 of the school year. (iii) Local educational agencies shall not exceed the standard sample size in paragraphs (c)(3)(i) or (c)(3)(ii) of this section, as applicable, and, unless eligible for one of the alternative sample sizes provided in paragraph (c)(4) of this section, the local educational agency shall not use a smaller sample size than those in paragraphs (c)(3)(i) or (c)(3)(ii) of this section, as applicable. (iv) If the number of error-prone applications exceeds the required sample size, the local educational agency shall select the required sample at random, i.e., each application has an equal chance of being selected, from the total number of error-prone applications.

SFA Suggested Guidance for Compliance

To come into compliance with the requirements for verifying the correct number of applications, the SFA must provide the State Agency with an assurance that staff conducting verification 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.

SFA Response



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Finding #2

Applications did not have verifying or confirming official signatures. The confirming official may not also be the determining or verifying official.

Technical Assistance Provided

During the review the SFA was informed that the confirming official may not also be the determining or the verifying official. The SFA should review the current Income Eligibility Manual for additional verification requirements. The SFA was also reminded that the hearing official may not be the determining, confirming, nor the verifying official.

Regulation / Citation Summary

CFR 245.6a(e)(1)(i) Confirmation of a household's initial eligibility. Prior to conducting any other verification activity, an individual, other than the individual who made the initial eligibility determination, shall review for accuracy each approved application selected for verification to ensure that the initial determination was correct. If the initial determination was correct, the local educational agency shall verify the approved application.

SFA Suggested Guidance for Compliance

To bring this area into compliance the SFA must provide the State Agency an assurance that the staff understands this requirement. The SFA must submit the person(s) by position(s) who will be the determining official for all applications, the confirming official for verification, and the verifying official.

SFA Response

Finding #3

The SFA did not provide the yearly civil rights training for the appropriate staff.

Technical Assistance Provided

During the on-site review the requirement to provide a yearly civil rights training was discussed with the SFA. The SFA must provide civil rights training at least once a year to all frontline staff and supervisor and maintain all required documentation.

Regulation / Citation Summary

FNS Instruction 113-1 Section XI Training is required so that people involved in all levels of administration of programs that receive Federal financial assistance understand civil rights related laws, regulations, procedures, and directives. Persons responsible for reviewing CR compliance must receive training to assist them in performing their review responsibilities. This training may be carried out as part of ongoing technical assistance. The FNS Regional OCR and

State agencies will be responsible for training State agency staffs. State agencies are responsible for training local agencies. Local agencies are responsible for training their sub-recipients, including "frontline staff." "Frontline staff" who interact with program applicants or participants, and those persons who supervise "frontline staff," must be provided civil rights training on an annual basis. Specific subject matter must include, but not be limited to: A. Collection and use of data, B. Effective public notification systems, C. Complaint procedures, D. Compliance review techniques, E. Resolution of noncompliance, F. Requirements for reasonable accommodation of persons with disabilities, G. Requirements for language assistance, H. Conflict resolution, and I. Customer service.

SFA Suggested Guidance for Compliance

To come into compliance with this requirement, the SFA must submit to the State Agency the process that will be put into place to ensure that the yearly civil rights training will be provided to all SFA staff and that the training will cover the required topics. Provide supporting



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Auministrative	Review Collective Action Figh	
	ed topics will be covered, such as an agenda or	
a copy of the training. SFA Response		
Findi	ng #4	
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		
Signature of Reviewer:	Date:	
Signature of SFA Representative:	Date:	

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



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Name of Reviewer: Name

Student Success & Wellness Bureau

120 S. Federal Place, Suite 207

Santa Fe, NM 87501 Phone: 505-827-1829

Email:

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.