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Christopher N. Ruskowski      Susana Martinez  
Secretary of Education      Governor

**Administrative Review Summary and Corrective Actions**

SFA Name:	Estancia Municipal Schools
SFA Code/ ID Number:	080000
Administrative Review Conducted on:	Tuesday, February 27, 2018
SFA Contact Name and Title:	Marla Lovato, School Nutrition Program Director
CNR Reviewer:	Richard Cumnard

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on February 27, 2108; 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 (Menu and Review) require a written response and must be submitted in writing to CN Resource, by **Friday, April 20, 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 **Friday, April 20, 2018**.

Thank you,



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

**CN Resource**  
**1930 N Arboleda, 101, Mesa, Arizona 85213**  
**p 866 941.6368 f 480 325.9967**

## Administrative Review Technical Assistance Summary

SFA Name:	Estancia Municipal Schools
SFA Code/ID Number:	080000
Administrative Review Conducted on:	Tuesday, February 27, 2018
SFA Contact Name and title:	Marla Lovato, School Nutrition Program Director
CNR Reviewer:	Richard Cumnard

### Commendations & Suggestions

Great job with appropriate meal signage.
Outstanding job operating Offer vs. Serve.
Great job with meal service.
Thank you for your kind accommodations during the review.

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

Menu Review- technical assistance was provided in an email to the SFA with the menu review results. Suggestions were provided to bring the menus into compliance.
Local School Wellness Policy - technical assistance provided that the SFA must perform an assessment on the implementation of the Local School Wellness Policy at least once every three (3) years. The assessment must be made available to the public once completed.
Offer vs Serve - technical assistance provided to the SFA that formal training (at least) annually should be conducted for entire kitchen staff.
Civil Rights - technical assistance provided to the SFA to post most current "And Justice For All" poster in prominent location at meal service. The poster was moved prior to lunch. No further action is required.
Food Safety - technical assistance provided to the SFA that all boxed food product should be dated upon receipt, and that all loose product should be dated when it is removed from the box.

SFA Name: <i>Estancia Municipal Schools</i>	Site(s) Selected for Review: 1 <i>Upper Elementary</i>	NSLP Grade Group: K-8	SBP Grade Group: K-12	<input type="checkbox"/> N/A
SFA ID Number: <i>080000</i>	2 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
Week of Menu Review: <i>1/8/18 -/1/12/18</i>	3 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A

**Menu Review Findings: Lunch**

- Site 1:**
1. For the week of menu review, the lunch menu did not meet the minimum daily vegetable requirement. Vegetables were offered daily, however the minimum required portion size was not met.
  2. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the beans/legumes vegetable subgroup.

**Technical Assistance**

During the Administrative Review the results of the menu review were provided in a detailed Menu Review Results Report. Recommendations were included to bring all areas into compliance. All menus served within the SFA for the National School Lunch Program must meet all daily and weekly meal pattern requirements for the specific grade group. The SFA was encouraged to provide training as needed to ensure compliance. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews, may result in fiscal action.

*For detailed regulations see: 7 CFR 210.10*

Required Criteria for Response to Findings	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide a written statement that the daily vegetable and beans/legumes vegetable subgroup requirements are now met. Include details to describe what specific changes were made to the menu to correct all menu review findings and bring the menu into compliance.			
2. Submit any necessary documentation to demonstrate that the menu findings listed under step 1 are now corrected. This documentation may include: production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes. Reference the menu review results report for specific details and suggestions to bring the menu into compliance.			
3. List the steps that will be taken when a site does not have one of the planned menu items or there are insufficient quantities on the serving day.			
4. Provide a written statement that the serving line will be visually reviewed prior to service to confirm that all required components are available.			

5. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.			
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### Menu Review Findings: Breakfast

1. For the week of menu review, the breakfast menu did not meet the minimum daily grain requirements. The minimum portion size was not met. This contributed to not meeting the daily grain requirement.
2. For the week of menu review, the breakfast menu did not meet the minimum daily fruit requirement. Fruit was offered daily, however the minimum required portion size was not met.
3. For the week of menu review, the breakfast menu did not meet the requirement of no more than 50% of the fruit offerings may be in the form of juice.

### Technical Assistance

During the Administrative Review the results of the menu review were provided in a detailed Menu Review Results Report. Recommendations were included to bring all areas into compliance. All menus served within the SFA for the School Breakfast Program must meet all daily and weekly meal pattern requirements for the specific grade group. The SFA was encouraged to provide training as needed to ensure compliance. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews, may result in fiscal action.

*For detailed regulations see: 7 CFR 220.10*

Required Criteria for Response to Findings	SFA Response	CNR Internal	
		Appv	Intls.
1. Provide a written statement that the daily grain, fruit, and fruit juice requirements are now met. Include details to describe what specific changes were made to the menu to correct all menu review findings and bring the menu into compliance.			
2. Submit any necessary documentation to demonstrate that the menu findings listed under step 1 are now corrected. This documentation may include: production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes. Reference the menu review results report for specific details and suggestions to bring the menu into compliance.			
3. List the steps that will be taken when a site does not have one of the planned menu items or there are insufficient quantities on the serving day.			
4. Provide a written statement that the serving line will be visually reviewed prior to service to confirm that all required components are available.			
5. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.			



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

SFA Name: Estancia Municipal Schools  
 SFA Code/ID: 080000

Administrative Review Conducted: Tuesday, February 27, 2018  
 Site(s) Selected for Review: Upper Elementary  
N/A  
N/A

Date Corrective Action Plan was provided to SFA: 3/21/2018

Due Date for Corrective Action Plan: 4/20/2018

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: Civil Rights			
The SFA does not have a procedure in place for handling civil rights complaints.			
Technical Assistance			
During the review the requirement for the SFA to have a complaint procedure was discussed. The procedure must indicate: that any person or representative alleging discrimination based on a prohibited basis has the right to file a complaint; all complaints, written or verbal, must be forwarded to the appropriate Regional or FNS OCR Director, unless an approved State complaint procedure is in place; in the event a complainant makes the allegations verbally or in person and refuses or is not inclined to place such allegations in writing, the person to whom the allegations are made must write up the elements of the complaint for the complainant. The procedure must also identify the outside agency to which the complaints are forwarded.			
For detailed regulation see: FNS Instruction 113-1 Section XV Complaint Procedures			
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 all alleged civil rights complaints regarding the meal programs will not be handled internally and that the complaints will be forwarded to the appropriate agency.			

Finding #2: Meal Counting and Claiming	
The SFA does not conduct a daily edit check for each meal service. Meals were claimed in excess of enrolled students three days during the review period.	

### Technical Assistance

During the review, edit checks were discussed with the SFA. The SFA does not conduct a daily edit check for each meal service. To be in compliance, the SFA must ensure that edit checks are completed daily. How to complete edit checks to ensure meal counts do not exceed attendance adjusted eligible and/or total enrollment was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.

*For detailed regulation see: 210.8(a)(3) Edit checks.*

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 SFA will complete a daily edit check and will maintain edit check records for a minimum of 3 years plus the current school year.			
4. Provide one month of completed edit checks for the site(s) selected for review as supporting documentation for this finding.			

### Finding #3: Civil Rights

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

### Technical Assistance

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.

*For detailed regulation see: FNS Instruction 113-1 Section XI Training*

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 civil rights training to all appropriate staff.			
4. Provide a statement of assurance that all required topics will be covered in future civil rights trainings.			

### Finding #4: Local School Wellness Policy

The SFAs Local Wellness Policy does not contain all of the required components. The Wellness Policy does not include a plan for measuring implementation. The Wellness Policy does not include the following components: School Meals, Foods sold outside of school meals program adhering to Smart Snacks, Foods provided but not sold, and triennial assessment at least once every three (3) years.

### Technical Assistance

During the review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to contain the following: a designation of one or more SFA officials in charge of school compliance oversight; a plan for measuring compliance; goals for nutrition education, nutrition promotion, other school based

activities to promote student wellness, and physical activity; and guidance for all foods available on school campus. The SFA should also contact the state agency to determine if there are any additional requirements from the state or if they have any state specific resources. The SFA was provided with the USDA link for Wellness Policies. <http://www.fns.usda.gov/tn/local-school-wellness-policy>

*For detailed regulation see: 210.31 Local school wellness policy*

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 copy of the completed Local Wellness Policy.			
4. If the SFA needs more time to finish the Local Wellness Policy, provide a timeline for when parts of the plan will be completed.			

#### Finding #5: Professional Standards

The School Nutrition Program Director did not meet the training requirements, and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements.

#### Technical Assistance

During the review, annual training hour requirements were discussed with the SFA. To be in compliance, the SFA must ensure that the School Nutrition Program Director completes the required amount of training annually. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

*For detailed regulation see: 210.30(b)(3) Continuing education/training standards for program directors.*

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. List the names, length, and date of trainings that have been completed/planned to meet the required training hours.			

#### Finding #6: Professional Standards

The School Nutrition Program Manager did not meet the training requirements and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements.

#### Technical Assistance

During the review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that the School Nutrition Program Manager completes the required amount of training annually. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

*For detailed regulation see: 210.30(c) Continuing education/training standards for program managers.*

Required SFA Response	SFA Response	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. List the names, length, and date of trainings that have been completed/planned to meet the required training hours.			

#### Finding #7: Professional Standards

The school nutrition staff did not meet the training requirements, and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements.

#### Technical Assistance

During the review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that the School Nutrition staff complete the required amount of training annually. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

*For detailed regulation see: 210.30(d) Continuing education/training standards for all staff*

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. List the names, length, and date of trainings that have been completed/planned to meet the required training hours.			

#### Finding #8: Professional Standards

The SFA is not tracking training hours.

#### Technical Assistance

During the review, training requirements were discussed with the SFA. To be in compliance, the SFA must track the hours of training completed by all School Nutrition staff. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

*For detailed regulation see: During the review, training requirements were discussed with the SFA. To be in compliance, the SFA must track the hours of training completed by all School Nutrition staff. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.*

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 understanding that the SFA must track the hours of training completed by all School Nutrition staff.			
4. Provide a copy of the tracker that will be used by the SFA.			

### Finding #9: Record Keeping

During the review, having the proper documentation for all Identified Students was discussed with the SFA. To be in compliance, the SFA must maintain source documentation for all directly certified students, such as direct certification lists and/or other lists certifying that students are categorically eligible for free school meals, including lists of students who are designated as homeless or migrant.

### Technical Assistance

During the review, having the proper documentation for all Identified Students was discussed with the SFA. To be in compliance, the SFA must maintain source documentation for all directly certified students, such as direct certification lists and/or other lists certifying that students are categorically eligible for free school meals, including lists of students who are designated as homeless or migrant.

*For detailed regulation see: 210.23 (c) Retention of records.*

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 understanding that the SFA must keep all proper documentation used to establish the Identified Student Percentages and claiming percentages.			
4. Provide a written statement that includes: an indication that records will now be maintained for required time period and that a process that has been put into place to ensure that all required records will be maintained for 3 years after the final claim for reimbursement or until the resolution of an audit			

### Finding #10: Food Safety

The SFA did not have the most recent food safety inspection report posted in a publicly visible location.

### Technical Assistance

During the review, health inspections were discussed with the SFA. The SFA must post a copy of the most recent food safety inspection in a publicly visible location at the site.

*For detailed regulation see: 210.13(b) Food safety inspections.*

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 most recent food safety inspection is posted in a visible location.			
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### Finding #11: Food Safety

The SFA does not have documentation to show that they requested the two required health inspections from the applicable agency per school year.

#### Technical Assistance

During the review, health inspections were discussed with the SFA. The SFA must request two health inspections for each site for each school year and must maintain documentation of this request.

*For detailed regulation see: 210.13(b) Food safety inspections.*

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 annually request two inspections be completed and all documentation will be retained on file for the required time period.			

### Finding #12: Resource Management

The SFA's adult meal price is not in compliance with FNS Instruction 782-5, Rev. 1.

#### Technical Assistance

Adult meals should be priced at least at the per-meal USDA reimbursements and the value of commodities received. The SFA should be charging at least \$3.55 for an adult lunch (\$3.31 USDA reimbursement + \$.2325 commodities). The SFA's adult lunch price of \$3.00 is not meeting this requirement. The adult breakfast price should be at least \$2.09 (USDA reimbursement for student breakfast) but the SFA is only charging \$1.00. 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>

*For detailed regulation see: FNS Instruction 782-5, Rev. 1*

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. This should include documentation showing the new adult meal price.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			

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.

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: \_\_\_\_\_ *Richard Cumard* \_\_\_\_\_

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](mailto: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>