

**State of New Mexico**  
**Public Education Department**  
300 Don Gaspar  
Santa Fe, New Mexico 87501-2786  
Telephone (505) 827-5800  
[www.ped.state.nm.us](http://www.ped.state.nm.us)

Christopher N. Ruskowski      Susana Martinez  
Secretary of Education      Governor

**Administrative Review Summary and Corrective Actions**

SFA Name:	Fort Sumner Municipal Schools
SFA Code/ ID Number:	016000
Administrative Review Conducted on:	Tuesday, February 13, 2018
SFA Contact Name and Title:	Maggie Gauna, Food Service Director
CNR Reviewer:	Jamie Hawkins

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on February 13, 2018; an exit conference summarizing the findings took place on the same day..

The Administrative Review (AR) is a comprehensive evaluation of the Local Education Agency's (LEA's) National School Lunch Program (NSLP) and School Breakfast Program (SBP). The AR consists of two performance standards. While findings were identified, the two performance standards reviewed were found to be satisfactory. During the Administrative Review, compliance with the new meal pattern requirements is also evaluated, at this time there are no menu findings that warrant the termination of the performance based reimbursement.

This summary includes a comprehensive list of the technical assistance that was provided throughout the review as well as all findings that require a written response from the SFA. All items listed on the red Corrective Action tabs (Menu and Review) require a written response and must be submitted in writing to CN Resource, by **Wednesday, April 11, 2018**. Please complete the responses electronically. If any additional responses are needed, please respond on district letterhead. In addition to responding to the findings please ensure that additional training is provided to all staff to bring all finding areas into compliance. Failure to submit the required materials by the due date may result in the withholding of claims. Should corrective actions not be submitted, a follow-up review may take place to ensure all required corrective actions were completed and implemented system-wide as appropriate.

Any potential fiscal action will be calculated once the corrective action responses have been received and approved.

I appreciate the courtesies extended by you and your personnel during the review. If you have questions or need assistance concerning the school food service program, please call our office. Please respond to the Administrative Review Corrective Actions by **Wednesday, April 11, 2018**.

Thank you,



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

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

## Administrative Review Technical Assistance Summary

SFA Name:	Fort Sumner Municipal Schools
SFA Code/ID Number:	016000
Administrative Review Conducted on:	Tuesday, February 13, 2018
SFA Contact Name and title:	Maggie Gauna, Food Service Director
CNR Reviewer:	Jamie Hawkins

### Commendations & Suggestions

Outstanding job meeting all of the requirements for breakfast. All daily and weekly meal component and food quantity requirements were met for the week of menu review for the breakfast menu.
The staff was friendly and accommodating.
Great job promoting fruits and vegetables with your daily salad bar.

### 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.
Certification and Benefit Issuance - During the review, the requirements of the Direct Certification letter were discussed with the SFA. The SFA must include the information in the letter as outlined in the Eligibility Manual for School Meals, Chapter 2.
Certification and Benefit Issuance - During the review, documenting and notifying households of extended eligibility was discussed with the SFA. Per USDA the SFA must make an effort, to the extent possible, to identify additional children in the same household of those certified for assistance program benefits. The SFA must base extended eligibility on allowable records as outlined in USDA memo SP 25-2010. The SFA must maintain documentation for extended eligibility, the SFA may use a variety of methods to maintain this documentation. Some SFAs, write the name of the student that the benefits are extended to next to the student from the same household on the direct certification list. In this case the SFA should document the date added, the SFA representative's signature or initials with the name of the added student. Other SFAs maintain a consolidated list of students that have been extended eligibility, in this case the list includes: the name of the student, the name of the student that eligibility is extended through, and the date added. The list should have the name of the SFA representative that determined the extended eligibility.
Meal Counting and Claiming - During the review the requirement for a meal charge policy was discussed with the SFA. Per the USDA memo 46-2016 all SFAs are required to have a written policy on file.
Local Wellness Policy - During the review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to be made available to the public. The easiest method would be to post the wellness policy on the SFAs website. They can also send it out in a newsletter. The Local Wellness Policy is required to be reviewed and updated on a periodic basis to ensure that the policy reflects current requirements and SFA practices. The SFA is required to allow certain parties - parents, students, representatives of the school food authority, teachers of physical education, school health professions, the school board, school administrators, and the general public - to participate in the development, implementation, periodic review, and update of the Local Wellness Policy. The SFA must reach out to these parties to make them aware of their ability to participate. The SFA is required to perform an assessment of the Local Wellness Policy at a minimum once every three years. The results of the assessment need to be made available to the public. The SFA should use the results of the assessment to determine any changes or updates that need to be made to the wellness policy. The results of the assessment must be made available to the public.

Offer versus Serve Day of Review - During the review, the training requirement for Offer versus Serve was discussed. 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.

Civil Rights - During the review the requirement for the "And Justice for All" poster were discussed with the SFA. The poster must be on display in all serving/dining areas, the poster must be displayed in a location that is visible to students was discussed with the SFA, and the poster must be 11" wide x 17" high.

Food Safety - 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.

Food Safety - 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.

Food Safety - During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated upon delivery.

Meal Components and Quantities: Day of Review - During the review, using reduced-fat, low fat, fat-free mayonnaise, sour cream, and/or salad dressings instead of full-fat varieties and portion sizes for condiments (e.g. hot sauce, ketchup, mustard, salad dressing) should be controlled by placing items in portion cups, portion controlled packaging or the use of appropriate serving size utensils to limit portion size allowed per meal was discussed with the SFA.

#### Resource Management - Paid Lunch Price Reporting

Please make sure that paid lunch prices are accurately reported to PED. We suggest a second employee reviews the site applications for accuracy before submitting to PED. The paid lunch price on the site application for SY 17-18 (\$2.05) did not reflect the current year's paid lunch price of \$2.15. Additionally, the paid lunch price on the site application for SY 16-17 did not match the October 2016 price listed on the Paid Lunch Equity Tool.

SFA Name: <i>Fort Sumner Municipal Schools</i>	Site(s) Selected for Review: 1 <i>Fort Sumner Elementary</i>	NSLP Grade Group: K-5	SBP Grade Group: K-5	<input type="checkbox"/> N/A
SFA ID Number: <i>016000</i>	2	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
Week of Menu Review: <i>1/22/18 - 1/26/18</i>	3	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A

### Menu Review Findings: Lunch

#### Site 1:

1. For the week of menu review, not all grains offered at lunch were whole grain-rich. This contributed to not meeting the following requirements: daily grain and whole grain-rich.
2. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the dark green vegetable subgroup.
3. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the starchy 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 grain, whole grain-rich, and dark green and starchy 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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**Required Corrective Actions- Review Areas**  
**New Mexico Public Education**  
**Coordinated School Health & Wellness**  
**Administrative Review Corrective Action Plan**

SFA Name: Fort Sumner Municipal Schools  
 SFA Code/ID: 016000

Administrative Review Conducted: Tuesday, February 13, 2018  
 Site(s) Selected for Review: Fort Sumner Elementary  
0  
0

Date Corrective Action Plan was provided to SFA: 3/12/2018      **Due Date for Corrective Action Plan:** 4/11/2018

The following pages address the findings that were identified during the Administrative Review. There is an area for a response for each finding.

***Please enter the detailed response for each in the spaces provided .***

Finding #1: Certification and Benefit Issuance			
For transfer students in the middle of the school year, the SFA does not properly handle the status of the transfer students who have not submitted an application for the current school year. The SFA has been giving meal benefits to these students when there is no documentation to support a "free" or "reduced price" status.			
Technical Assistance			
During the review, properly handling the status of children for whom an application has not been submitted was discussed with the SFA. If a student has not submitted an application or is not on the Direct Certification list the student will either receive carryover status from the previous year if applicable or will be considered "paid" until an application is received and approved based on the information provided on the application. A student is only eligible for carryover benefits if during the previous school year they were enrolled within the SFA and were receiving free or reduced meal benefits. Additionally, if a new student is enrolled in the SFA and they have other household members that attended in the previous year, the carryover status may be extended to this child. Carryover status only applies for the first 30 operating days of the school year or until a new application is approved, whichever comes first. The SFA may not backdate eligibility statuses for students who submit an application after the beginning of the school year.			
<b><i>For detailed regulation see: 245.6(c) Application, eligibility and certification</i></b>			
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 will not provide benefits to the students before a complete application has been received.			

### Finding #2: Meal Counting and Claiming

The SFA does not conduct a daily edit check for each meal service.

#### 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 must use the current civil rights statement on all Program materials. The SFA is not using the civil rights statement on all Program materials.

#### Technical Assistance

During the review the requirement for the most current civil rights statement to appear on all Program material was discussed with the SFA. The SFA must use the most current statement on all Program material. Per USDA requirements the new Non-discrimination statement must be on all program materials no later than September 30, 2016. The SFA was provided with the USDA link to the new non-discrimination statement. <http://www.fns.usda.gov/fns-nondiscrimination-statement>

*For detailed regulation see: FNS Instruction 113-1 IX A 3 Nondiscrimination Statement.*

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 non-discrimination statement has been added to all nutrition program materials.			
4. Provide an example to show that the non-discrimination statement has been added. Ex: any letter to the household.			

### Finding #4: Civil Rights

The SFA is attempting to resolve complaints alleging discrimination within the FNS School Meal Programs.

Technical Assistance			
During the review the process for receiving and processing complaints alleging discrimination was discussed with the SFA. The SFA should not attempt to resolve complaints in-house and should forward all complaints to the appropriate outside agency.			
<i>For detailed regulation see: FNS Instruction 113-1 Section XV Complaint Procedures</i>			
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 #5: 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.			
<i>For detailed regulation see: FNS Instruction 113-1 Section XI Training</i>			
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 civil rights training will be provided annually to all appropriate staff.			
5. Provide a copy of the sign in sheet for the training.			

Finding #6: Local 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, goals for nutrition education, goals for nutrition promotion, goals for other school-based activities to promote student wellness, goals for physical activity, and nutrition guidance for all foods available on the school campus.			
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 #7: 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 #8: 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 #9: 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: 210.30(g) School food authority oversight.*

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 #10: Professional Standards

The employees outside of the school nutrition program whose responsibilities include duties related to the operation of the school nutrition program did not receive training applicable to their duties related to the program.

#### Technical Assistance

During the review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that employees outside of the School Nutrition programs (whose responsibilities include duties related to the operation of the School Nutrition program) receive adequate training specific to the task they perform. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

*For detailed regulation see: SP 39-2015: Question 29*

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 applicable to their			
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### Finding #11: Summer Food Service Program Outreach

The SFA has not performed SFSP outreach.

#### Technical Assistance

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

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

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

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a written statement that the SFA will cooperate with Summer Food Service Program sponsors to conduct outreach on the availability of the Summer Food Service Program.			

### Finding #12: Certification and Benefit Issuance

Not all selected applications were approved correctly. The SFA approved an application(s) with a case number that was not consistent with the format used in the state, and not all income based applications included the last four digits of the social security number of an adult household member, or an indication of none. There were 13 students receiving benefits that did not have eligibility documentation on file.

#### Technical Assistance

During the review, determining applications was discussed with the SFA. When determining eligibility, the SFA may approve an Assistance Program application only if it contains a valid case number, consistent with the format used in that state. For more information, see the Eligibility Manual for School Meals, Chapter 2 and the SFA must ensure that the household has included the last four digits of the social security number of an adult household member (or an indication of none); otherwise, the application is incomplete. For more information, see the Eligibility Manual for School Meals, Chapter 3.

*For detailed regulation see: Eligibility Manual, Chapter 2: The Basis of Eligibility, 245.6(a)(6) Application, eligibility and certification of children for free and reduced price meals and free milk*

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			

2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a statement that the staff approving applications understand the requirements.			
4. Describe how all applications will be determined correctly moving forward.			
5. Provide copies of each of the corrected applications, with the date corrected indicated, and letters to the household(s) if there is a change in eligibility status.			

### Finding #13: Certification and Benefit Issuance

The SFA did not use the correct conversion factors for applications with more than one income frequency.

#### Technical Assistance

During the review, the conversion factors were discussed with the SFA. When determining eligibility, the SFA must utilize the correct income version factors as outlined in the Eligibility Manual for School Meals, Chapter 3. If there are multiple income sources with more than one frequency, the LEA must annualize, that is, calculate all income as for an entire year, by multiplying: Weekly income by 52; or Bi-weekly income (received every two weeks) by 26; or Semi-monthly income (received twice a month) by 24; or Monthly income by 12.

*For detailed regulation see: 245.6(c)(4) Application, eligibility and certification*

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 income will be calculated using the correct conversion factors when more than one income frequency is on an application.			

### Finding #14: Certification and Benefit Issuance

The SFA does not have documentation from the SFA homeless liaison or from officials of homeless shelters where student(s) reside. Rather, SFA staff made the determination of these children's status as homeless.

#### Technical Assistance

During the review, direct certification documentation was discussed with the SFA. To be in compliance with the requirements for direct certification documentation, the SFA must ensure that the list comes from the proper agency. For further guidance, see the Eligibility Manual for School Meals, Chapter 2.

*For detailed regulation see: Eligibility Manual, Chapter 2: The Basics of Eligibility*

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 eligibility determinations may only be made based off of documentation from the appropriate agency. Students found to be incorrectly determined during the review must have their status corrected.			
4. Provide the date the correction was made.			

**Finding #15: Food Safety**

The SFA's food safety plan does not contain the required elements. The SFA's food safety plan is missing the process approach inventory logs.

**Technical Assistance**

During the review, the food safety plan was discussed with the SFA. The SFA must have a complete food safety plan that includes all of the required sections as specified by USDA.

A school food authority with a food safety program based on the process approach to HACCP must ensure that its program includes:

- Standard operating procedures to provide a food safety foundation;
- Menu items grouped according to process categories;
- Critical control points and critical limits;
- Monitoring procedures;
- Corrective action procedures;
- Recordkeeping procedures;
- Periodic program review and revision.

*For detailed regulation see: 210.13(c) Food safety program.*

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 food safety plan has been updated to include the required elements.			
4. Provide documentation that demonstrates the food safety plan has been updated and now contains all the required elements.			

**Finding #16: Offer versus Serve: Day of Review**

Offer versus Serve reimbursable meal signage is not posted, including the requirement for students to select at least 1/2 cup fruit or vegetable.

**Technical Assistance**

During the review, the requirement for Offer versus Serve meal signage was reviewed with the SFA. Requirements include identifying, near or at the beginning of the serving line(s), the food items that constitute a reimbursable meal, including the requirement that students must take at least 1/2 cup of the fruit or vegetable

component.

*For detailed regulation see: 210.10 (a)(2) Unit pricing.*

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 Offer versus Serve reimbursable meal signage is now posted. In the statement provide the location where signage was posted.			

### Finding #17: Resource Management

The SFA had an excess of three months average expenditures in its year-end net cash resources, and did not have approval from the State Agency.

#### Technical Assistance

The SFA must not accumulate net cash resources exceeding three months' average expenditures, unless they receive prior approval from the State Agency. During the review it was determined that the SFA had an excess cash balance of \$26,846 and did not have prior approval from the State Agency. Additional technical assistance was given during the review, explaining how to calculate compliance with net cash resource requirements. The SFA should submit a spend-down plan explaining how the net cash resources will be spent down to an appropriate level. The SFA can purchase new equipment, improve food quality, upgrade food service software, implement additional food service training, increase food service wages and benefits where appropriate, etc. in order to improve the food service program.

*For detailed regulation see: 210.14(b) Net cash resources.*

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Submit a spend-down plan explaining how the SFA will lower the nonprofit school food service fund balance to a level at or below 3 months average expenditures. This should include estimated dates and amounts of any planned purchases/costs, as well as an expected timeline for spending down the balance.			
2. Provide a written statement explaining the internal controls that have been put into place to ensure that the food service net cash resource balance will remain under 3-months' average expenses in the future or prior approval will be received from the State Agency if an excess balance is expected.			
3. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			

Check the confirmation check box, sign and date the form (typing in your signature is acceptable) and upload the signed copy to [cnrsupport.com](http://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: \_\_\_\_\_

Date: \_\_\_\_\_

Signature of CN Resource Reviewer: Jami Hoban \_\_\_\_\_

Date: \_\_\_\_\_

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>