



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

Name of School Food Authority: **Jemez Mountain Public Schools**
School Site(s) reviewed: Gallina Elementary

Date of On-Site Review: **28, February, 2018**

Date Corrective Action Plan Was provided to SFA: **12, March, 2018**

Date your Corrective Action Plan Response is due to NMPED: 11, April, 2018

COMMENDATIONS

PERFORMANCE STANDARD 1
SFA is classified under Community Eligibility Provision. SFA showed all documentation regarding the established percentages with regard to their Identified Student Percentages or ISP.
SFA had proper documentation of their Public Release
SA verified that the FNS-742 Report had been conducted in a timely manner

PERFORMANCE STANDARD 2
SFA accommodated students with Special Dietary Needs
Production records continuously maintained as required
Two types of fluid milk offered at each meal service

GENERAL AREAS
SFA Wellness Policy in compliance with USDA regulations
SFA in compliance with Civil Rights and Professional Standards training
Potable water available and free

Other areas of Technical Assistance (NOT requiring Corrective Action)

- **SFA was provided TA with required meal components and quantities as per SBP and NSLP regulations.**
- **SFA was not offering enough fruit.**



New Mexico Public Education Department

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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 SFA does not conduct a daily edit check for each meal service.
Technical Assistance Provided
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.
Regulation / Citation Summary
210.8(a)(3) Edit checks. (i) The following procedure shall be followed for school food authorities identified in paragraph (a)(2)(ii) of this section, by other school food authorities at State agency option, or, at their own option, by school food authorities identified in paragraph (a)(2)(i) of this section: the school food authority shall compare each school's daily counts of free, reduced price and paid lunches against the product of the number of children in that school currently eligible for free, reduced price and paid lunches, respectively, times an attendance factor.
SFA Suggested Guidance for Compliance
To come into compliance with the requirements for counting and claiming, the SFA must provide the State Agency with an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. The plan must include: an indication that the SFA is now conducting a daily edit check for each meal service, a description of the new process that has been implemented, a description of the training that was provided to staff to inform them of the new process, the date the training was completed and the name and title of the SFA representative that will ensure compliance moving forward. Additionally, SFA staff will need to complete the Meal Counting and Claiming training found in the School Nutrition Toolbox at http://www.schoolnutritiontoolbox.org/snt-v3/index.php and submit one week of completed edit checks.
SFA Response



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

Finding #2

Offer versus Serve is not being implemented correctly. Some meals were incomplete due to insufficient quantities offer and/or selected by the students.

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 senior high school(s). 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

Empty box for SFA Response.



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

Finding #3
The SFA is not following their State Agency approved application. The SFA is not operating proper Offer vs. Serve requirements.
Technical Assistance Provided
During the review, the State Agency approved application was discussed with the SFA. The SFA is not following their State Agency approved application. To be in compliance, the SFA must ensure that it is following the State Agency approved application. The SFA must contact the State Agency to get approval for any changes in the program since the last application was approved. The SFA acknowledged the finding and will implement needed changes immediately.
Regulation / Citation Summary
210.7(a) General. Reimbursement payments to finance nonprofit school food service operations shall be made only to school food authorities operating under a written agreement with the State Agency.
SFA Suggested Guidance for Compliance
To come into compliance with the requirements for counting and claiming, the SFA must provide the State Agency with an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. The plan must include: an indication that the SFA is now following the State Agency approved application, a description of the new process that has been implemented, a description of the training that was provided to staff to inform them of the new process, the date the training was completed and the name and title of the SFA representative that will ensure compliance moving forward. Additionally, SFA staff will need to complete the Meal Counting and Claiming training found in the School Nutrition Toolbox at http://www.schoolnutritiontoolbox.org/snt-v3/index.php .
SFA Response



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

Finding #4

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

Technical Assistance Provided

Requirements under Offer vs. Serve 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. It was determined during the review that the SFA did not have meal signage posted that identifies the food items that constitute a reimbursable meal. The SFA acknowledged the finding and will implement needed changes immediately.

Regulation / Citation Summary

210.10 (a)(2) Schools must identify, near or at the beginning of the serving line(s), the food items that constitute the unit-priced reimbursable school meal(s).

SFA Suggested Guidance for Compliance

To come into compliance with the requirements of Offer vs. Serve, the SFA must state that reimbursable meal signage is now posted for the students and provide the location where it was posted.

SFA Response



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

Finding #5

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

Technical Assistance Provided

Requirements under Offer vs. Serve 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. It was determined during the review that the SFA did not have meal signage posted that identifies the food items that constitute a reimbursable meal. The SFA acknowledged the finding and will implement needed changes immediately.

Regulation / Citation Summary

210.10 (a)(2) Schools must identify, near or at the beginning of the serving line(s), the food items that constitute the unit-priced reimbursable school meal(s).

SFA Suggested Guidance for Compliance

To come into compliance with the requirements of Offer vs. Serve, the SFA must state that reimbursable meal signage is now posted for the students and provide the location where it was posted.

SFA Response



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

Finding #6
<p>The SFA is not implementing their food safety plan. SFA is not calibrating their digital thermometer.</p>
Technical Assistance Provided
<p>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.</p>
Regulation / Citation Summary
<p>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.</p>
SFA Suggested Guidance for Compliance
<p>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.</p>
SFA Response



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

Finding #7
Storage violations were observed on-site. The SFA had food that was opened and not dated with date opened.
Technical Assistance Provided
During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated once opened.
Regulation / Citation Summary
210.13(a) Health standards. The school food authority shall ensure that food storage, preparation and service is in accordance with the sanitation and health standards established under State and local law and regulations. 210.13(d) (d) Storage. The school food authority shall ensure that the necessary facilities for storage, preparation and service of food are maintained. Facilities for the handling, storage, and distribution of purchased and donated foods shall be such as to properly safeguard against theft, spoilage and other loss.
SFA Suggested Guidance for Compliance
To come into compliance with this finding the SFA must submit an assurance that the SFA is aware of the requirements for food storage and holding within the food safety guidelines. The assurance must include: a statement that all food and chemicals will be kept separately; a statement that all food items will be dated with the delivery date as well as the date the product was opened; a statement that all food will be stored at least 6 inches off of the floor; and a statement that all storage areas including coolers, freezers and storage rooms will be kept within the allowable temperature ranges. The assurance should also include a statement that temperature logs will be maintained for all storage areas. Submit copies of completed temperature logs with the corrective action response.
SFA Response



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

Finding #8
The SFA is not following their State Agency approved application. SFA indicated that Gallina Elementary is participating in Breakfast After the Bell (BAB). However upon review all students were eating in the Cafeteria before the bell.
Technical Assistance Provided
During the review, the State Agency approved application was discussed with the SFA. The SFA is not following their State Agency approved application. To be in compliance, the SFA must ensure that it is following the State Agency approved application. The SFA must contact the State Agency to get approval for any changes in the program since the last application was approved. The SFA acknowledged the finding and will implement needed changes immediately.
Regulation / Citation Summary
210.7(a) General. Reimbursement payments to finance nonprofit school food service operations shall be made only to school food authorities operating under a written agreement with the State Agency.
SFA Suggested Guidance for Compliance
To come into compliance with the requirements for counting and claiming, the SFA must provide the State Agency with an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. The plan must include: an indication that the SFA is now following the State Agency approved application, a description of the new process that has been implemented, a description of the training that was provided to staff to inform them of the new process, the date the training was completed and the name and title of the SFA representative that will ensure compliance moving forward. Additionally, SFA staff will need to complete the Meal Counting and Claiming training found in the School Nutrition Toolbox at http://www.schoolnutritiontoolbox.org/snt-v3/index.php .
SFA Response



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

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: Jerome Armijo. Health Educator
Student Success & Wellness Bureau
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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.