# State of New Mexico Public Education Department

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Christopher N. Ruszkowski Susana Martinez Secretary of Education Governor

#### Administrative Review Summary and Corrective Actions

SFA Name:	Melrose Public Schools		
SFA Code/ ID Number:	014000		
Administrative Review Conducted on:	Wednesday, February 14, 2018		
SFA Contact Name and Title:	Kaoma Burnett, 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 14, 2018 an exit conference summarizing the findings took place on the same day of exit conference.

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,

Cay Offul RD

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:	Melrose Public Schools		
SFA Code/ID Number:	014000		
Administrative Review Conducted on:	Wednesday, February 14, 2018		
SFA Contact Name and title:	Kaoma Burnett, Food Service Director		
CNR Reviewer:	Jamie Hawkins		

## Commendations & Suggestions

The staff was friendly and accommodating.

The students were well behaved and knew what items needed to be on their trays.

There were no resource management findings. Thank you for completing the Paid Lunch Equity Tool each year and adhering to the pricing requirements for both paid student lunches and adult meals.

## 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.

Menu Review- recipes are not all standardized and not all are in written standardized format. Standardize your recipes so that true yields and portion sizes can be determined.

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 extended eligibility was discussed with the SFA. Per USDA the SFA must make and 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.

Certification and Benefit Issuance - 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.

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.

Verification - During the on-site review, making needed changes based on the confirmation reviews was discussed with the SFA. The SFA must make such changes in accord with the process outlined in the Eligibility Manual for School Meals, Chapter 4.



Civil Rights - 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

Local Wellness Policy - During the review, Local Wellness Policies were discussed with the SFA. 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.

Local Wellness Policy - During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to perform an assessment of the Local Wellness Policy at a minimum at least once every three years. The results of the assessment must be made available to the public.

Offer versus Serve - 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 incompliance with Offer vs. Serve procedures.

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, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated upon delivery.



SFA Name:

Melrose Public Schools

SFA ID Number:

014000

Week of Menu Review:

1/8/18 - 1/11/18

(-,			
1 Melrose Jr High School	NSLP Grade Group: 6-8	SBP Grade Group: 6-8	□ N/A
2 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	□ N/A
3 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	□ N/A

## Menu Review Findings: Lunch

- 1. For the week of menu review, the lunch menu did not meet the minimum grain requirements. The minimum portion size was not met and not all grains offered at lunch were whole grain-rich. This contributed to not meeting the following requirements: daily grain, weekly grain, and whole grain-rich.
- 2. For the week of menu review, the lunch 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 lunch menu did not meet the minimum daily vegetable requirement. Vegetables were offered daily, however the minimum required portion size was not met.
- 4. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the red/orange vegetable subgroup.

Site(s) Selected for Review:

- 5. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the beans/legumes vegetable subgroup.
- 6. For the week of menu review and day of review, the lunch menu did not meet milk requirements. Fluid milk offered must be low-fat (1% milk fat or less, unflavored) or fat-free (flavored or unflavored).

#### **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 Inte	ernal Use
Required effected for Response to Findings	3177 Nessponse	Арру.	Intls.
1. Provide a written statement that the daily grain, weekly grain, whole grain-rich, fruit, vegetable, milk, and red/orange 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.		

## Menu Review Findings: Breakfast

- 1. For the week of menu review, not all grains offered at breakfast were whole grain-rich. This contributed to not meeting the following requirements: daily grain, weekly grain, and whole grain-rich. Meat/meat alternate products may credit towards the weekly grain requirement, once the daily grain requirement is met with a whole grain-rich product.
- 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 and day of review, the breakfast menu did not meet milk requirements. Fluid milk offered must be low-fat (1% milk fat or less, unflavored) or fat-free (flavored or unflavored).

#### **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	
Required effected for Response to Findings	31 A Nesponse	Appv	Intls.
1. Provide a written statement that the daily grain, weekly grain,			
whole grain-rich, fruit, and milk 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.		



7





# New Mexico Public Education Coordinated School Health & Wellness Administrative Review Corrective Action Plan

SFA Name: Melrose Public Schools		Administrative Review Conduct	t <b>ed:</b> Wednesday	, February 14, 2018	
SFA Code/ID: 014000		Site(s) Selected for Review:	Melrose Jr Hi	gh School	
		_		N/A	i
				N/A	i.
Date Corrective Action Plan	was provided to SFA:	3/12/2018	Due Date for Correct	ive Action Plan:	4/11/2018
					<u>.,,</u>
The following pages as	ddress the findings that were	identified during th	e Administrative Review. There is an are	ea for a response for	r each finding

The following pages address the findings that were identified during the Administrative Review. There is an area for a response for each finding <u>Please enter the detailed response for each in the spaces provided</u>.

## Finding #1: 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 (note, this replaces the whyhunger.org website)
- Use the site locator for smartphones Rangeapp.org

For detailed regulation see: 210.12(d) Outreach activities. (2)			
Required 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 #2: Certification and Benefit Issuance

Not all selected applications were approved correctly. Not all applications included the signature of an adult household member and the SFA did not calculate the income and household size correctly.

#### **Technical Assistance**

During the review, determining applications was discussed with the SFA. When determining eligibility, the SFA must ensure that the application includes the signature of an adult household member; otherwise, the application is incomplete and the SFA must ensure that the household has listed the amounts, source, and frequency of current income for each household member; otherwise, the application is incomplete. For more information. For more information, see the Eligibility Manual for School Meals, Chapter 3.

For detailed regulation see: 245.6(a)(7) Application, eligibility and certification of children for free and reduced price meals and free milk

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Required SFA Response SFA Response		Appv.	ernal Use 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 #3: Certification and Benefit Issuance

The SFA's notice of adverse action did not contain all required information.

#### Technical Assistance

During the review, the notice of adverse action was discussed with the SFA. In its notice, the SFA must include the information as outlined in the Eligibility Manual for School Meals, Chapter 4.

 For detailed regulation see: 245.6a(j) Adverse action.

 Required SFA Response
 CNR Internal Use Appv. Intls.

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

 2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.
 Image: CNR Internal Use Appv. Intls.



kequile	ed Corrective Actions- Review Areas		
3. Provide a statement of understanding that the SFA's notice of adverse action must include the information outlined in the Eligibility Manual for School Meals, Chapter 4.			
4. Provide a copy of the revised notice of adverse action.			
5: 1: 44.24.16		•	
On the day of review, it was observed that items in the salad bar are r	Components and Quantities: Day of Review		
on the day of review, it was observed that items in the salad bar die r	Technical Assistance		
required components in the minimum portion size required for the sp students to make sure they know what is required for a reimbursable	sed with the SFA. The SFA must ensure that all meals counted for reimbursement of the secific grade group. The SFA should consider providing additional signage and train meal. The SFA should also provide additional training to the point of service staff used for training materials, resources and guidance on the meal pattern.	ning to	the
For detailed regu	lation see: 210.10(c)(2) Food components		
Required SFA Response	SFA Response	CNR Inte Appv.	rnal Use Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.		7 1,5 15 1	
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 ensure that all meals claimed for reimbursement contain at least the minimum number of required components in the minimum portion size for the specific grade group.			
4. Provide a step by step process that will be implemented at the point of service to ensure that all meals claimed for reimbursement contain the minimum components in the minimum portion size for the specific grade group.			
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 t indicated.	he due	date
By checking this box you confirm that all of the above responses have been review provided to all applicable staff to bring all finding areas into compliance moving	ewed and are representative of practices within the SFA. In addition the SFA ensures that additional trainforward.	ining will	be
Signature of SFA Representative:	Date:		
Signature of CN Resource Reviewer:			



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





## **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:

 $\underline{https://www.fns.usda.gov/community-eligibility-provision-guidance-and-updated-qas-1}$ 

