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Christopher N. Ruskowski      Susana Martinez  
Secretary of Education      Governor

**Administrative Review Summary and Corrective Actions**

SFA Name:	Quemado Independent Schools
SFA Code/ ID Number:	003000
Administrative Review Conducted on:	Wednesday, February 14, 2018
SFA Contact Name and Title:	Nichole Sanders, FSD
CNR Reviewer:	Danielle Reidy

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.

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:	Quemado Independent Schools
SFA Code/ID Number:	003000
Administrative Review Conducted on:	Wednesday, February 14, 2018
SFA Contact Name and title:	Nichole Sanders, FSD
CNR Reviewer:	Danielle Reidy

### Commendations & Suggestions

Great job meeting the whole grain-rich requirement for breakfast and lunch!
Kitchen was well organized and clean.

### 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, updating the point of service was discussed with the SFA. When eligibility changes, the SFA must make these updates at the point of service within specific timeframes. When there is an increase in benefits the SFA should make the change immediately, if there is a decrease or termination in benefits the household should be provided 10 days of adverse action before the status is changed.
Local School 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.
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 once opened, including storage bins.
Buy American Provision - During the review, Buy American requirements were discussed with the SFA. The SFA must purchase, to the maximum extent practicable, domestic commodities or products. "Domestic commodity or product" is defined as an agricultural commodity that is produced in the U.S. and a food product that is processed in the U.S. substantially using agricultural commodities produced in the U.S. There are limited exceptions to the Buy American provision which allow for the purchase of foods not meeting the "domestic" standard in circumstances when use of domestic foods is truly not practicable. The SFA must keep documentation justifying the limited exception(s). These exceptions, as determined by the SFA, are: <ul style="list-style-type: none"> <li>• The product is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality; or</li> <li>• Competitive bids reveal the costs of a U.S. product are significantly higher than the non-domestic product.</li> </ul>
Resource Management - Adult Breakfasts The SFA offers adult breakfasts for free, and does not make a general fund transfer to repay the food service account. Adult meal sales should accrue as revenue to Fund 21000. The SFA's operational fund does support the food service account, so the SFA should calculate the annual costs of the adult breakfasts to document that the operational support exceeds the cost of the adult breakfasts. The SFA should take the number of adult breakfasts served during the year, and multiply by the free USDA reimbursement rate for breakfasts (\$2.09 in SY 17-18) to determine total adult breakfast costs

Resource Management - Reporting Paid Lunch Prices

The SFA misreported paid lunch prices to PED. The SFA reported a SY 17-18 paid lunch price of \$2.30 on their site application in the nutrition portal, but actually charged \$2.40. It is suggested that a second employee reviews the site application for accuracy before submitting the form. Paid lunch prices must be accurately reported to the State Agency.

SFA Name: *Quemado Independent Schools*  
 SFA ID Number: *003000*  
 Week of Menu Review: *1/9/18 - 1/12/18*

Site(s) Selected for Review:	NSLP Grade Group:	SBP Grade Group:	
1 <i>Quemado Elementary</i>	K-8	K-8	<input type="checkbox"/> N/A
2 <i>N/A</i>			<input type="checkbox"/> N/A
3 <i>N/A</i>			<input type="checkbox"/> N/A

**Menu Review Findings: Lunch**

For the week of menu 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). 2% white milk was served.

**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 milk requirement is 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**

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). 2% white milk was served.

### 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 milk requirement is 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: Quemado Independent Schools  
 SFA Code/ID: 003000

Administrative Review Conducted: Wednesday, February 14, 2018  
 Site(s) Selected for Review: Quemado Elementary  
N/A  
N/A

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			
Not all selected applications were approved correctly. The SFA did not calculate the income correctly.			
Technical Assistance			
During the review, determining applications was discussed with the SFA. When determining eligibility, 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, see the Eligibility Manual for School Meals, Chapter 3. When determining the total household income the SFA must use all income provided on the application.			
<i>For detailed regulation see: 245.6(c)(4) Application, eligibility and certification of children for free and reduced price meals and free milk</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 that the staff approving applications understand the requirements.			
4. Describe how all applications will be determined correctly moving forward.			

Finding #2: Certification and Benefit Issuance			
The SFA annualized income when it should have been determined at its stated frequency.			
Technical Assistance			
During the review, making determinations based on the stated frequency was discussed with the SFA. When determining eligibility, the SFA may not annualize income unless income sources are listed at different frequencies. 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 not be annualized when it should be determined at its stated frequency (monthly, weekly, bi weekly, or 2 x per mo.)			

**Finding #3: Verification**

Not all applications selected for review were verified correctly. The SFA accepted a bank statement which indicated net income, not total gross income.

**Technical Assistance**

During the review, the importance of obtaining written evidence was discussed with the SFA. The SFA must obtain written evidence of total gross income.

*For detailed regulation see: 245.6a(f)(2) Documentation timeframe.*

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 is required to obtain written evidence of total gross income.			

**Finding #4: Meal Counting and Claiming**

The SFA is not claiming meals served during field trips properly because the count is not taken at the point of service.

**Technical Assistance**

During the review, claiming meals during field trips was discussed with the SFA. The SFA is not claiming meals served during field trips properly because the count is not taken at the point of service. To be in compliance, the SFA must ensure that meals served during field trips are claimed based on accurate counts taken at the point of service. The SFA acknowledged the finding and will implement needed changes immediately.

*For detailed regulation see: 210.7(c)(1) Lunch count system.*

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 includes: a statement that the SFA will properly claim field trips meals based on the point of service and a description of the process that will be used as the point of service for all field trips.			
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**Finding #5: Meal Counting and Claiming**

The point of service for breakfast did not provide an accurate meal count by eligibility status. This is a non-systematic error. Preschool and kindergarten students eat breakfast in the cafeteria and meals are recorded by teachers after the class goes back to the classroom.

**Technical Assistance**

To be in compliance, the SFA must ensure that meal counts taken daily at the point of service correctly identify the number of free, reduced priced and paid lunches served. Tracking students accurately at the point of service was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.

*For detailed regulation see: 210.7(c)(1) Lunch count system.*

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 the new/revised process, in writing, that will be implemented at the point of service to ensure accurate meal counts by category.			

**Finding #6: Meal Components and Quantities**

On the day of review, fluid milk was not available in at least two varieties on all serving lines for lunch. There was milk available throughout the meal, however there was only one option available toward the end of meal service.

**Technical Assistance**

During the review the milk requirement discussed with the SFA. Two types of milk must be available on all serving lines throughout the entire meal service.

*For detailed regulation see: 7 CFR 210.10*

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 two types on milk will be available on all serving lines throughout the entire meal service.			

**Finding #7: Offer versus Serve**



Offer versus Serve reimbursable meal signage is posted for breakfast but does not include 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 for breakfast now includes verbiage that students must select at least 1/2 cup fruit or vegetable.			

#### Finding #8: Civil Rights

The SFA is using the incorrect civil rights statement. They are using an outdated version of the statement.

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 a copy of the <i>Letter to Households: Notification Selection for Verification</i> to show that the non-discrimination statement has been added.			
5. Provide a copy of the Notice to Households Approval/Denial Letter to show that the non-discrimination statement has been updated.			

Finding #9: Civil Rights			
The SFA did not submit a public release.			
Technical Assistance			
During the review the requirement for a public release to be submitted for publishing was discussed with the SFA. At or near the beginning of each year, the SFA must submit a public release to the local media, the unemployment office and any major employers who are contemplating large layoffs in the attendance area of the school.			
For detailed regulation see: §245.5(a)(1) Public Release			
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 a public release will be submitted for publishing at or near the beginning of each school year.			

Finding #10: 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.			
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 #11: Food Safety			
Temperature logs are not being maintained for all food storage areas.			
Technical Assistance			
During the review, temperature logs were discussed with the SFA. The SFA must maintain temperature logs for all food storage areas, in accordance with the requirements of the local health department. The completed temperature logs must be kept on file for a minimum of six (6) months.			

*For detailed regulation see: 210.15(b)(5) Records from the 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 SFA understands the requirements for food safety documentation, including that all temperature documents must be maintained for a minimum of six (6) months.			

**Finding #12: SFSP 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 website)
- Use the site locator for smartphones - 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			

**Finding #13: Fresh Fruit and Vegetable Program**

The school is not widely publicizing the Fresh Fruit and Vegetable Program.

**Technical Assistance**

During the review, program publicity was discussed with the SFA. To be in compliance, the school participating in the FFVP must ensure that the program is widely publicized so that students and their families are aware of this opportunity. The SFA was informed to review the current year's FFVP Handbook for additional guidance.

*For detailed regulation see: RICHARD B. RUSSELL NATIONAL SCHOOL LUNCH ACT SEC. 19. [42 U.S.C. 1769a] FRESH FRUIT AND VEGETABLE PROGRAM (e) NOTICE OF AVAILABILITY.*

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 is now publicizing the Fresh Fruit and Vegetable Program.			
4. Provide supporting documentation as needed to demonstrate the methods of publication.			

**Finding #14: 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 \$17,950. 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's food service fund was not charged for the fully allowable amount of food service expenses incurred in SY 16-17, as the operational fund paid for a portion of these expenses. Charging allowable food service expenses to Fund 21000 instead of Fund 11000 is one step the SFA can take to reduce the excess cash balance. The SFA can also 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 <u>expected timeline for spending down the balance.</u>			
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.			

**Finding #15: Resource Management**

The SFA did not submit a point of sale report as requested.

**Technical Assistance**

During the review, the SFA was requested to submit a point of sale report from the current school year. A point of sale report is used to confirm that the SFA properly tracks nonprogram sales, identify any a la carte items sold, and to confirm the adult meal price. The SFA did not submit the point of sale report, and will need to submit a copy as part of the corrective action response.

*For detailed regulation see: 210.19(a)(1) Assurance of compliance for finances.*

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Submit a sample point of sale report for at least one week from the current year, showing the adult meal and a la carte sales.			

### Finding #16: Resource Management

The SFA sold nonprogram foods, but did not determine compliance with nonprogram food requirements.

#### Technical Assistance

The SFA has not determined compliance with nonprogram food revenue requirements. The USDA NonProgram Food Revenue Tool should be completed every year. You can use a 5-day reference period to complete the tool. This tool should include adult/staff meals (including the free adult breakfasts), a la carte, extra milks, extra entrees, and vended machine items as your nonprogram foods. If the tool shows you are out of compliance, you need to increase nonprogram food prices. A copy of the tool and a link to USDA memo SP 20-2016 was sent in an email during this review. Both documents can be found on the USDA website. An additional CN Resource excel workbook was sent to the SFA to help complete the USDA tool.

*For detailed regulation see: 210.14(f) Revenue from nonprogram foods.*

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide a written statement of understanding that the USDA Nonprogram Food Revenue Tool will be completed each year. This should include a timeframe for when the tool will be completed and assurance that the SFA will take the necessary steps to come into compliance if the tool shows they did not generate sufficient nonfederal revenue.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide written assurance that the SFA has received a copy of the USDA NonProgram Food Revenue Tool and the most recent USDA nonprogram foods memo.			

<p>4. Submit a completed copy of the USDA NonProgram Food Revenue Tool, including the calculations and documentation used to complete the tool. If the tool shows you are out of compliance, include a written statement explaining how nonprogram food prices will be increased to come into compliance.</p>			
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**Finding #17: Resource Management**

The SFA incorrectly completed the Paid Lunch Equity Tool, therefore the tool did not determine compliance with paid lunch equity requirements.

**Technical Assistance**

During the review, it was determined that the SFA did not correctly calculate the weighted average paid lunch requirement price (calculated using the Paid Lunch Equity Tool) in order to determine compliance with paid lunch equity requirements. The SFA input the incorrect price into Step 1 on the Unrounded Requirement Finder tab of the SY 17-18 PLE Tool. They input the current paid lunch price, instead of the unrounded requirement price. The SFA should properly train staff on how to complete the Paid Lunch Equity Tool, in order to correctly determine if a paid lunch price increase is necessary. Training is available through the State Agency, and further technical assistance was provided in an email during the review to help the SFA correctly complete the tool. A corrected copy of the tool was emailed to the SFA.

*For detailed regulation see: 210.14(e) Pricing paid lunches.*

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Confirm you received the corrected Paid Lunch Equity Tool for SY 17-18.			
2. Provide assurance that you have read through the technical assistance given by the reviewer, understand the error that was made on the tool, and are aware of how to correctly complete the tool for next year.			
3. Upload the corrected PLE tool to the 2018 application in the Nutrition Portal. Provide a statement saying this has been completed.			

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: \_\_\_\_\_ *Danielle Reidy*

Date: \_\_\_\_\_  
 Date: February 14, 2018

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



CN Resource  
P.O. Box 31060  
Mesa, AZ 85275  
866-941-6368  
[adminreview@cnresource.com](mailto:adminreview@cnresource.com)

**Required Corrective Actions- Review Areas**

## 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>