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Christopher N. Ruskowski Susana Martinez
Secretary of Education Governor

Administrative Review Summary and Corrective Actions

SFA Name:	Saint Francis of Assisi-Lumberton
SFA Code/ ID Number:	054148
Administrative Review Conducted on:	Wednesday, February 14, 2018
SFA Contact Name and Title:	Madeline Lyon/Principal
CNR Reviewer:	Gavin Mack

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:	Saint Francis of Assisi-Lumberton
SFA Code/ID Number:	054148
Administrative Review Conducted on:	Wednesday, February 14, 2018
SFA Contact Name and title:	Madeline Lyon/Principal
CNR Reviewer:	Gavin Mack

Commendations & Suggestions

Great job meeting the whole grain-rich requirement for the lunch menu, for the week of menu review!

Thank you for being so kind and accommodating.

SFA was very open to suggestions and guidance given onsite.

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- USDA recipes were submitted but after further discussion, it is clear that these recipes are not always followed. For example, a USDA recipe for tacos was submitted, but the cafeteria staff indicated this recipe was actually not followed. This is also true of the seasoned chicken wrap.

Please maintain standardized recipes for menu items. If you choose to make changes to USDA recipes, you may do so by indicating the changes on the USDA recipe.

Menu Review- it is necessary to indicate the serving's sizes on the production records more clearly and accurately. For example, the production record shows 2 oz. as the serving size for yogurt, but the label that was provided was for a 6 oz. yogurt. The PR should state 1 each- 6 oz. yogurt as the serving size.

Also, please look through the printed menu to be sure that it is accurate as far as what is served for crediting foods. For example, the printed menu states that 1% milk is served, but the labels provided do not reflect that. This is also true for the pancakes, which is stated as whole wheat on the printed menu. Accurately record correct serving sizes for all menu items.

Menu Review- other notes:

Bacon is not a creditable food. It can be served, but is considered an extra item and does not credit towards the meal pattern requirements, while it still contributes towards the nutrient requirements.

The bread used for the toast weighs 26 g, which credits as 0.75 oz. eq. bread/grains. Consider serving a 28 gram slice of bread so it meets 1 oz. eq. grain if served alone.

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 SFA's website. They can also send it out in a newsletter.

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.

Certification and Benefit Issuance - During the review, the benefit issuance document was discussed with the SFA. The SFA was informed that the list should identify how the eligibility for each student was determined. This can be through direct certification, application, etc. The benefit issuance document should also reflect the date that any changes were made within the system.

Meal Counting and Claiming - During the review, training for cashiers and substitute cashiers was discussed. The SFA does not provide training to cashiers and substitute cashiers. It is recommended that the SFA provide training annually or as needed to cashiers and substitute cashiers. The SFA acknowledged the technical assistance and will implement needed changes.

SFA Name:	Site(s) Selected for Review:	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/>	N/A
<i>Saint Francis of Assisi-Lumberton</i>	1 <i>Saint Francis School</i>	K-8	K-8	<input type="checkbox"/>	N/A
SFA ID Number:	2 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/>	N/A
<i>054148</i>	3 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/>	N/A
Week of Menu Review:	1/8/18 - 1/11/18				

Menu Review Findings: Lunch

Site 1:

1. For the week of menu review, the lunch menu did not meet the minimum daily and weekly requirements for grain. A grain was offered daily, however the minimum daily and weekly requirements were not met.
2. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the starchy vegetable subgroup.
3. 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

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, weekly grain, starchy vegetable subgroup, 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.			
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Menu Review Findings: Breakfast

1. For the week of menu review, the breakfast menu did not meet the minimum grain requirements. The minimum portion size was not met and 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 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	
		Appv	Intls.
1. Provide a written statement that the daily grain, weekly grain, whole grain-rich, 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.			
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Required Corrective Actions- Review Areas
New Mexico Public Education
Coordinated School Health & Wellness
Administrative Review Corrective Action Plan

SFA Name: Saint Francis of Assisi-Lumberton
 SFA Code/ID: 054148

Administrative Review Conducted: Wednesday, February 14, 2018
 Site(s) Selected for Review: Saint Francis School
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			
The hearing official is the same SFA representative that made the original eligibility determination.			
Technical Assistance			
During the review, hearing official requirements were discussed with the SFA. The hearing official must be a different individual from the one who made the original eligibility determination. The SFA must ensure that all documents and public releases mentioning the hearing official are updated.			
For detailed regulation see: 245.7(a)(2)(vii)Hearing official			
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 person by position who will be the hearing official and the determining official.			

Finding #2: Certification and Benefit Issuance			
The SFA is not performing direct certification.			
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 documentation contains the following information: the name of the child; a statement certifying that the child is a member of a household receiving assistance under SNAP, FDPIR or TANF; information in sufficient detail to match the child attending school in the local educational agency with the name of a child who is a member of one of the applicable programs; the signature of the official from the applicable program; and the date that the official signed the certification statement.			

The SFA must perform at least 3 Direct Certification matches according to the timeframes established by the State Agency. The SFA may elect to complete additional direct certification matches however at a minimum they must complete 3 match within the set timeframe. The SFA must maintain Direct Certification lists on file or 3 years after the date of the fiscal year to which they pertain, except that if audit findings have not been resolved, the documentation must be maintained as long as required for resolution of the issues raised by the audit.

For detailed regulation see: 245.6(b)(3) 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 all directly certified documentation will be complete.			
4. Provide a statement of understanding that the SFA will perform Direct Certification matches according to the required timeframes moving forward.			
5. Provide a statement of understanding that all Direct Certification lists will be maintained on file.			

Finding #3: Certification and Benefit Issuance

The SFA does not have a procedure for extending free school meal eligibility to all children who are members of a household in which one person in that household is receiving SNAP, TANF, or FDPIR benefits, as the SFA is not making the required effort to the extent possible to identify additional children in these households.

Technical Assistance

During the review, documenting 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.

For detailed regulation see: 245.6(b)(7) 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 the SFA will extend eligibility from one student to other household members only based on district records, a household application, or a parent's signed attestation.			
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Finding #4: Certification and Benefit Issuance

Updates are not made to the point of service benefit issuance document(s) in a timely manner.

Technical Assistance

During the review, updating the point of service benefit issuance document was discussed with the SFA. When eligibility changes, the SFA must make these updates in a timely manner. 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.

For detailed regulation see: 245.6(c)(6) 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 the SFA will always update the point of service document/system when there is a			

Finding #5: Certification and Benefit Issuance

Changes are not being made to the point of service benefit issuance document in a correct manner to reflect the expiration of 30 days of carryover eligibility. The SFA is not allowing students a full 30 operating days of carryover eligibility before the SFA is changing the eligibility.

Technical Assistance

During the review, updating the point of service and expiring carryover eligibility at the appropriate time was discussed with the SFA. When a new eligibility is established (either through direct certification or a meal benefit application), the new status takes precedence over the status of the prior year's eligibility. The SFA must then make the appropriate updates at the point of service.

For detailed regulation see: Eligibility Manual, Chapter 3: Establishing 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 written plan to ensure that changes to the point of service will be made when new current school year meal benefit information is obtained and if nothing is received, the status will be changed to paid after the 30 day carryover period expires.			
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Finding #6: Verification

The SFA did not complete verification by November 15.

Technical Assistance

During the review, completing verification on time was discussed with the SFA. The SFA must complete verification by November 15.

For detailed regulation see: 245.6a(b) Deadline and extensions

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 steps the SFA will take to perform verification that include specific dates for completion.			

Finding #7: 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 civil rights statement to appear on all Program material was discussed with the SFA. The SFA must use the statement on all Program material.

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 #8: 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 #9: 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 #10: 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 #11: 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 duties in the program.			

Finding #12: 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	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 #13: Food Safety

The SFA does not have a food safety plan.

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. The SFA must have a food safety plan available at each site so that food service staff may stay in compliance with food safety requirements and procedures.

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 statement that a complete food safety plan has been developed and is available at each site within the SFA.			
4. Provide the following Standard Operating Procedures (SOP) from the food safety plan: Receiving Deliveries, Washing Hands and Date Marking Ready-to-Eat, Potentially Hazardous Foods.			

Finding #14: Resource Management

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

Technical Assistance

The SFA has priced their adult meals below the cost of producing these meals. Adult meals should be priced at least at the student price plus per-meal reimbursements and the value of commodities received. In the current year, the SFA priced adult lunches at \$3.20, but should have charged at least \$3.83 (\$3.20 student price + \$.39 federal reimbursement + \$.2325 value of commodities). Adult breakfasts are priced at \$1.50, but the SFA should be charging at least \$1.80 (\$1.50 student price + \$.30 federal reimbursement). The SFA should increase adult meal prices to an appropriate level. Reimbursement rates and the commodities value per-meal can be found on the USDA website:

<https://www.fns.usda.gov/school-meals/rates-reimbursement>

<https://www.fns.usda.gov/fdd/value-donated-foods-notice>

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

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.

1. Provide the date that the finding was brought into compliance or the planned date of completion. This should include documentation showing the new adult meal price.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a written statement outlining the SFA's adult meal pricing policy. This policy should establish guidelines for an annual reassessment of adult meal prices in line with FNS Instruction 782-5.			

Finding #15: Resource Management

The SFA does not track the food service fund balance. Compliance with net cash resource requirements could not be determined.

Technical Assistance

The SFA must track the balance of the nonprofit food service account in order to meet the requirement for having a separate financial account for the nonprofit school food service program and to determine compliance with net cash resource requirements. When the food service program operates at a surplus, tracking food service revenues & expenditures separately from other SFA operations is not sufficient. The SFA must track the profits accumulated by the program, as these profits can only be used to improve & operate the nonprofit school food service program. If the SFA does not maintain a separate bank account or use fund accounting, the SFA must find a way to track the food service account balance. Suggestions include adding an asset account in the accounting ledger specifically designated for the cash belonging to the food service program, or tracking the surpluses manually in an annual report of Financial Position. Additional information was provided in an email to the SFA during the review.

If the SFA's ending fund balance exceeds the 3 month average expenses, the SFA must submit a spend-down plan explaining how they will reduce the excess balance. 3 month average expenses can be determined by taking total expenses for the year, dividing by 9 operating months, and multiplying by 3.

For detailed regulation see: 214.10 (a) Nonprofit School Food Service, (b) Net Cash Resources, and (c) Financial Assurances

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Submit a Statement of Financial Position/Balance Sheet (as of June 30, 2017) showing the ending cash balance for food service. If you do not track the food service balance in your accounting system, you will need to figure out how much money in your school bank account belongs to the food service program. Any profits earned by food service can only be used by food service, so it is important to separate food service funds from general school funds.			

<p>2. If the SFA's ending fund balance exceeded the three month average expenses, the SFA must 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.</p>			
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Finding #16: Resource Management

The SFA charged unallowable costs to the food service account.

Technical Assistance

Expenses charged to the food service account must be necessary, reasonable and allocable. During the review, it was determined that the SFA charged unallowable costs to the food service program (see list below). The SFA is responsible for ensuring no unallowable purchases are made using food service funds, and should have internal controls in place to prevent such unallowable costs from occurring. Examples of internal controls include staff training on allowable costs, developing written policies & procedures so only trained, authorized personnel can approve food service expenses, and segregation of duties. An extensive list of allowable and unallowable costs can be found in 2 CFR Part 200, Subpart E.

(1) The SFA erroneously charged \$70.00 on 10/2/16 to the food expense account to pay for staff meals at a fundraising event. The SFA's principal stated this was a mistake, and will be corrected. The expense should have been recorded to a non-food service expense account.

(2) The SFA purchased creamer for teacher coffee through SYSCO on 10/27/16 for a total of \$47.86. The SFA should not purchase coffee or creamer using food service funds, as this is not necessary for the National School Lunch Program. Any perks offered to school staff, such as free coffee, should be paid out of the school's general budget. The SFA should charge these expenses to a non-food service expense account in Quickbooks, or repay the food service expense account for these unallowable purchases.

For detailed regulation see: 2 CFR 200 Subpart E

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide documentation showing the food service account was reimbursed for the \$70.00 staff meal expense.			
2. Explain how internal controls have been improved to prevent unallowable costs from being charged to the food service account in the future. This could include additional staff training, written policies & procedures on charging expenses to the food service account, a list of unallowable costs that will no longer be charged to food service, improved segregation of duties, etc.			
3. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance in the future.			

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: Gavin Mack

Date: _____
 Date: February 14, 2018

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



Administrative Review Team

CN Resource

P.O. Box 31060

Mesa, AZ 85275

866-941-6368

adminreview@cnresource.com

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>