



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

Name of School Food Authority:	<b>SFA Shiprock Associated Schools Inc</b>
School Site(s) reviewed:	Sites Reviewed Shiprock Northwest High School
Date of On-Site Review:	<b>Date May 1, 2018</b>
Date Corrective Action Plan Was provided to SFA:	<b>Date June 14, 2018</b>
<b>Date your Corrective Action Plan Response is due to NMPED:</b>	<b>Due Date July 14, 2018</b>

**COMMENDATIONS**

PERFORMANCE STANDARD 1
Monthly edit checks maintained with meal counts and supporting documents.
PERFORMANCE STANDARD 2
Variety of OvS items available for HS students.
Students seemed to enjoy lunch. The staff was friendly and willing to learn.
GENERAL AREAS
SFA maintained proper temperature logs.
Water available during meal service.

**Other areas of Technical Assistance (NOT requiring Corrective Action)**

- **Not using short non-discrimination statement, sent SFA non-discrimination statements to be posted on all program materials.**
- **Creating tracking sheet to track hours properly for all staff. Each staff maintained folder of certificates.**
- **Provided Meal Pattern requirement breakdown charts.**
- **Post non-discrimination statement on website.**



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The following pages address the findings that were identified during your Administrative Review. For each finding you will be presented with the following:

- A summary of the regulation / requirement
- Suggested guidance for the SFA in order to achieve compliance
- The finding, and details specific to the SFA regarding the finding
- SFA area for reply to state how, when and by whom corrections will be made
- The Code of Federal Regulations citation number or alternate resource citation

**Please provide a detailed response to each finding in the spaces provided**

<b>Finding #1</b>
The SFA has not collected racial/ethnic data on an annual basis.
<b>Technical Assistance Provided</b>
During the review, the requirement to collect racial/ethnic data was discussed with the SFA. The SFA must collect racial/ethnic on an annual basis through the mechanism of their choosing.
<b>Regulation / Citation Summary</b>
FNS Instruction 113-1 Appendix B Section F The collection and reporting of data on the actual number of children applying for free and reduced-price meals or free milk, by ethnic/racial group, is required by DOJ Regulations, 28 CFR Part 42, and 9 AR. (a) The SFA or other program recipient agency will: (1) Develop a method for data collection. Methods include determination of the information by a school official through observation, personal knowledge, or voluntary self-identification by an applicant on the free and reduced-price meal or free milk application.
<b>SFA Suggested Guidance for Compliance</b>
To come into compliance with this requirement, the SFA must provide the State Agency with an assurance that the SFA will complete all racial/ethnic data collection and that the SFA will put plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency.
<b>SFA Response</b>

<b>Finding #2</b>
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.
<b>Technical Assistance Provided</b>
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



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USDA link to the new non-discrimination statement. <a href="http://www.fns.usda.gov/fns-nondiscrimination-statement">http://www.fns.usda.gov/fns-nondiscrimination-statement</a>
<b>Regulation / Citation Summary</b>
FNS Instruction 113-1 IX A 3 Nondiscrimination Statement. All information materials and sources, including Web sites, used by FNS, State agencies, local agencies, or other subrecipients to inform the public about FNS programs must contain a nondiscrimination statement. It is not required that the nondiscrimination statement be included on every page of the program information Web site. At the minimum, the nondiscrimination statement, or a link to it, must be included on the homepage of the program information.
<b>SFA Suggested Guidance for Compliance</b>
To come into compliance with civil rights requirements, the SFA must submit an assurance to the State Agency that the current non-discrimination statement has been added to all program materials. In addition, the SFA must submit a sample of program materials, such as a menu or letter to households with the statement added to the State Agency.
<b>SFA Response</b>

<b>Finding #3</b>
The "And Justice for All" poster is the incorrect poster. Green poster must be posted.
<b>Technical Assistance Provided</b>
During the review the requirement for the "And Justice for All" poster were discussed with the SFA. The poster must be on display in all serving/dining areas, the poster must be displayed in a location that is visible to students was discussed with the SFA, and the poster must be 11" wide x 17" high.
<b>Regulation / Citation Summary</b>
FNS Instruction 113-1 Section B Methods of Public Notification. Each State agency, local agency, or other subrecipient serving the public must take the actions below to inform the general public, potentially eligible populations, community leaders, grassroots organizations, and referral sources about FNS programs and applicable CR requirements. 1 Prominently display the USDA nondiscrimination poster "And Justice for All," or an FNS approved substitute, except in family day care homes. If a State agency elects to produce its own posters, either due to unavailability from USDA/FNS or State agency preference, the reproduction must be approximately the same size as the applicable "And Justice for All" poster (11" width and 17" height).
<b>SFA Suggested Guidance for Compliance</b>
To come into compliance with this requirement, the SFA must provide the State Agency with a statement that the correct "And Justice for All" poster has been posted in a visible location with the serving/dining area.
<b>SFA Response</b>

<b>Finding #4</b>
The SFA does not have a Local School Wellness Policy.



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### Technical Assistance Provided

During the review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to contain the following: a designation of one or more SFA officials in charge of school compliance oversight; a plan for measuring compliance; goals for nutrition education, nutrition promotion, other school based activities to promote student wellness, and physical activity; and guidance for all foods available on school campus. The SFA should also contact the state agency to determine if there are any additional requirements from the state or if they have any state specific resources. The SFA was provided with the USDA link for Wellness Policies. <http://www.fns.usda.gov/tn/local-school-wellness-policy>

### Regulation / Citation Summary

210.30 Local School Wellness Policy. (c) Content of the plan. At a minimum, local school wellness policies must contain: (1) Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. In developing these goals, local educational agencies must review and consider evidence-based strategies and techniques; (2) Standards for all foods and beverages provided, but not sold, to students during the school day on each participating school campus under the jurisdiction of the local educational agency; (3) Standards and nutrition guidelines for all foods and beverages sold to students during the school day on each participating school campus under the jurisdiction of the local educational agency that; (i) Are consistent with applicable requirements set forth under §§ 210.10 and 220.8 of this chapter; (ii) Are consistent with the nutrition standards set forth under § 210.11; (iii) Permit marketing on the school campus during the school day of only those foods and beverages that meet the nutrition standards under § 210.11; and (iv) Promote student health and reduce childhood obesity. (4) Identification of the position of the LEA or school official(s) or school official(s) responsible for the implementation and oversight of the local school wellness policy to ensure each school's compliance with the policy; (5) A description of the manner in which parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public are provided an opportunity to participate in the development, implementation, and periodic review and update of the local school wellness policy; and (6) A description of the plan for measuring the implementation of the local school wellness policy, and for reporting local school wellness policy content and implementation issues to the public, as required in paragraphs (d) and (e) of this section.

### SFA Suggested Guidance for Compliance

To come into compliance with the requirements for Local School Wellness Policies, the SFA must submit a written assurance that the appropriate staff understand the requirements for the wellness policy. The SFA must also develop a Local Wellness Policy that has all of the required areas and submit this to the State Agency. If the SFA needs additional time to develop the wellness policy and have it approved by the school board, the SFA must submit a detailed timeline that shows when each step will be completed. Once the policy is in place it must be submitted to the state agency for review. Submit the name and title of the SFA representative that will oversee this process and ensure compliance.

### SFA Response

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### Finding #5

The SFA is not tracking training hours.

### Technical Assistance Provided



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During the on-site 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.

### Regulation / Citation Summary

210.30(g) School food authority oversight. Each school year, the school food authority director must document compliance with the requirements of this section for all staff with responsibility for school nutrition programs, including directors, managers, and staff. Documentation must be adequate to establish, to the State's satisfaction during administrative reviews, that employees are meeting the minimum professional standards.

### SFA Suggested Guidance for Compliance

To come into compliance with the requirements for Professional Standards, the SFA must provide the State Agency with an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency, indicating how the SFA will ensure that training is now being tracked.

### SFA Response

### Finding #6

Records were not retained for 3 years after the final Claim for Reimbursement for the fiscal year or until resolution of any audits.

### Technical Assistance Provided

Records must be retained for three (3) years after the final Claim for Reimbursement for the fiscal year or until the resolution of any audits. It was determined that the SFA was not retaining records for 3 years after the final Claim for Reimbursement. The requirement for the SFA to retain records for the required time period was discussed with the SFA.

### Regulation / Citation Summary

210.23 (c) Retention of records. State agencies and school food authorities may retain necessary records in their original form or on microfilm. State agency records shall be retained for a period of 3 years after the date of submission of the final Financial Status Report for the fiscal year. School food authority records shall be retained for a period of 3 years after submission of the final Claim for Reimbursement for the fiscal year. In either case, if audit findings have not been resolved, the records shall be retained beyond the 3-year period as long as required for the resolution of the issues raised by the audit.

### SFA Suggested Guidance for Compliance

To come into compliance with reporting and recordkeeping requirements, the SFA must provide written assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan. The plan must include: an indication that records will now be maintained for required time period, the process that has been put into place to ensure that all required records will be maintained for 3 years after the final claim for reimbursement or until the resolution of an audit, and state the person(s) name(s)/title(s) who will oversee that all records are properly retained.

### SFA Response



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### Finding #7

Meal count totals by category have not been combined or recorded correctly. This is a non-systemic error. During the day of review, cashier walked away from end of serving line to clean a spill and missed some students causing her meal count for the day to be off.

### Technical Assistance Provided

During the review, accurate meal counts were discussed with the SFA. Meal count totals by category have not been combined or recorded correctly. This is a systemic error. To be in compliance, the SFA must ensure that meal counts are being recorded accurately. Consolidating meal counts by category was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.

### Regulation / Citation Summary

210.7(c)(1) Lunch count system. To ensure that the Claim for Reimbursement accurately reflects the number of lunches and meal supplements served to eligible children, the school food authority shall, at a minimum:(iii) Base Claims for Reimbursement on lunch counts, taken daily at the point of service, which correctly identify the number of free, reduced price and paid lunches served to eligible children; (iv) Correctly record, consolidate and report those lunch and supplement counts on the Claim for Reimbursement.

### SFA Suggested Guidance for Compliance

To come into compliance with the requirements for counting and claiming, the SFA must provide the State Agency with an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan to the State Agency. Additionally, SFA staff will need to complete the Meal Counting and Claiming training found in the School Nutrition Toolbox at <http://www.schoolnutritiontoolbox.org/snt-v3/index.php>.

### SFA Response

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### Finding #8

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

### Technical Assistance Provided

Requirements under Offer vs. Serve include identifying, near or at the beginning of the serving line(s), the food items that constitute a reimbursable meal, including the requirement that students must take at least 1/2 cup of the fruit or vegetable component. It was determined during the review that the SFA did not have meal signage posted that identifies the food items that constitute a reimbursable meal. The SFA acknowledged the finding and will implement needed changes immediately.

### Regulation / Citation Summary

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

### SFA Suggested Guidance for Compliance

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

### SFA Response

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<b>Finding #9</b>
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Signage is not posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal for breakfast.
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<b>Technical Assistance Provided</b>
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During the review, the importance of signage was discussed with the SFA. The SFA must ensure that signage is posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal.
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<b>Regulation / Citation Summary</b>
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220.8(a)(2) Unit pricing. Schools must price each meal as a unit. The price of a reimbursable lunch does not change if the student does not take a food item or requests smaller portions. Schools must identify, near or at the beginning of the serving line(s), the food items that constitute the unit-priced reimbursable school meal(s).
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<b>SFA Suggested Guidance for Compliance</b>
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To come into compliance with the meal signage requirements the SFA must state that the proper signage has been posted. Please submit a copy of the signage used and indicate where in the serving line it was posted. Also please note the date that the signage was posted. Include the person by position that will oversee that the signage has been posted and how this person will keep all staff informed that signage is required.
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<b>SFA Response</b>
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<b>Finding #10</b>
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Signage is not posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal for lunch.
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<b>Technical Assistance Provided</b>
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During the review, the importance of signage was discussed with the SFA. The SFA must ensure that signage is posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal.
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<b>Regulation / Citation Summary</b>
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210.10(a)(2) Unit pricing. Schools must price each meal as a unit. Schools need to consider participation trends in an effort to provide one reimbursable lunch and, if applicable, one reimbursable afterschool snack for each child every school day. If there are leftover meals, schools may offer them to the students but cannot get Federal reimbursement for them. Schools must identify, near or at the beginning of the serving line(s), the food items that constitute the unit-priced reimbursable school meal(s). The price of a reimbursable lunch does not change if the student does not take a food item or requests smaller portions.
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<b>SFA Suggested Guidance for Compliance</b>
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To come into compliance with the meal signage requirements the SFA must state that the proper signage has been posted. Please submit a copy of the signage used and indicate where in the serving line it was posted. Also please note the date that the signage was posted. Include the person by position that will oversee that the signage has been posted and how this person will keep all staff informed that signage is required.
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<b>Finding #12</b>
Based on the targeted menu review, the menu for grade group K-12 did not meet the dietary specification for saturated fat for breakfast.
<b>Technical Assistance Provided</b>
During the review, saturated fat levels were discussed with the SFA. All menus offered must meet the saturated fat requirements to be in compliance with the dietary specifications. On average over the school week, the menu must provide less than 10 percent of total calories from saturated fat. This applies to both breakfast and lunch.
<b>Regulation / Citation Summary</b>
220.8(f)(2) Saturated fat. Effective July 1, 2012 (SY 2012-2013), school breakfasts offered to all age/grade groups must, on average over the school week, provide less than 10 percent of total calories from saturated fat.
<b>SFA Suggested Guidance for Compliance</b>
Recommendation: Restrict high saturated fats breakfast entrée options.  To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all required components are planned, at a minimum the required serving size for the specific grade group will be met for each component, the average weekly calories will fall within the USDA established range for the specific grade group, that the weekly menu will not exceed the USDA established sodium restriction for the specific grade group, that the weekly menu will provide no more than 10% Saturated Fat, and that all products and ingredients used to prepare school meals will contain zero grams of trans fats. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Submit any additional information that is needed to demonstrate compliance such as production records, recipes, labels, or Child Nutrition labels.
<b>SFA Response</b>

<b>Finding #13</b>
Based on the targeted menu review, the menu for grade group K-12 did not meet the dietary specification for sodium for breakfast.
<b>Technical Assistance Provided</b>
During the review, appropriate sodium ranges were discussed with the SFA. The menus must meet the sodium requirements for the menus to be in compliance with the dietary specifications. The sodium requirements for breakfast are: K-5: <=540; 6-8: <=600; 9-12: <=640; K-12: <=540.
<b>Regulation / Citation Summary</b>
220.8(f)(3) Sodium. School breakfasts offered to each age/grade group must meet, on average over the school week, the levels of sodium specified: K-5: <=540; 6-8: <=600; 9-12: <=640, K-12: <=540.
<b>SFA Suggested Guidance for Compliance</b>
Recommendation: Keep high sodium entrees offered to two or less a week.  To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan



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should include; a statement that all menus will be reviewed to ensure that all required components are planned, at a minimum the required serving size for the specific grade group will be met for each component, the average weekly calories will fall within the USDA established range for the specific grade group, that the weekly menu will not exceed the USDA established sodium restriction for the specific grade group, that the weekly menu will provide no more than 10% Saturated Fat, and that all products and ingredients used to prepare school meals will contain zero grams of trans fats. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Submit any additional information that is needed to demonstrate compliance such as production records, recipes, labels, or Child Nutrition labels.

### SFA Response

### Finding #14

For the week of menu review, the K-8 lunch menu did not meet the minimum weekly requirement of 1/2 cup dark green vegetable subgroup.

### Technical Assistance Provided

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. This includes meeting the weekly requirements for the vegetables sub-groups. Over the course of the standard school week the SFA must at a minimum meet the required servings for each sub-group. The SFA should review all menus to ensure that at least the minimum serving for each sub-group is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. <http://healthymeals.nal.usda.gov/>

### Regulation / Citation Summary

210.10(c)(iii) Vegetables component. Vegetable offerings at lunch over the course of the week must include the vegetable subgroups, as defined in this section in the quantities specified in the meal pattern in paragraph (c) of this section: K-12: 1/2 C dark green.

### SFA Suggested Guidance for Compliance

Recommendations: review all planned menus to ensure that they meet the minimum weekly vegetable sub-group requirements on serving line.

To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all weekly requirements for grains are met for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.



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**SFA Response**

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**Finding #15**

For the week of menu review, the K-8 lunch menu did not meet the minimum weekly requirement of 3/4 cup red/orange vegetable subgroup.

**Technical Assistance Provided**

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. This includes meeting the weekly requirements for the vegetables sub-groups. Over the course of the standard school week the SFA must at a minimum meet the required servings for each sub-group. The SFA should review all menus to ensure that at least the minimum serving for each sub-group is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. <http://healthymeals.nal.usda.gov/>

**Regulation / Citation Summary**

210.10(c)(iii) Vegetables component. Vegetable offerings at lunch over the course of the week must include the vegetable subgroups, as defined in this section in the quantities specified in the meal pattern in paragraph (c) of this section: K-8: 3/4 C red/orange.

**SFA Suggested Guidance for Compliance**

Recommendations: review all planned menus to ensure that they meet the minimum weekly vegetable sub-group requirements on serving line.

To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all weekly requirements for grains are met for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

**SFA Response**

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### Finding #16

For the week of menu review, the K-8 lunch menu did not meet the minimum weekly requirement of 1/2 cup starchy vegetable subgroup.

#### Technical Assistance Provided

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. This includes meeting the weekly requirements for the vegetables sub-groups. Over the course of the standard school week the SFA must at a minimum meet the required servings for each sub-group. The SFA should review all menus to ensure that at least the minimum serving for each sub-group is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. <http://healthymeals.nal.usda.gov/>

#### Regulation / Citation Summary

210.10(c)(iii) Vegetables component. Vegetable offerings at lunch over the course of the week must include the vegetable subgroups, as defined in this section in the quantities specified in the meal pattern in paragraph (c) of this section: K-12: 1/2 C starchy.

#### SFA Suggested Guidance for Compliance

Recommendations: review all planned menus to ensure that they meet the minimum weekly vegetable sub-group requirements on serving line.

To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all weekly requirements for grains are met for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

#### SFA Response

### Finding #17

For the week of menu review, the K-8 lunch menu did not meet the minimum weekly requirement of 1/2 cup beans/legumes vegetable subgroup.

#### Technical Assistance Provided

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. This includes meeting the weekly requirements for the vegetables sub-groups. Over the course of the standard school week the SFA must at a minimum meet the required servings for each sub-group. The SFA should review all menus to ensure that at least the minimum serving for each



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<p>sub-group is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. <a href="http://healthymeals.nal.usda.gov/">http://healthymeals.nal.usda.gov/</a></p>
<p style="text-align: center;"><b>Regulation / Citation Summary</b></p>
<p>210.10(c)(iii) Vegetables component. Vegetable offerings at lunch over the course of the week must include the vegetable subgroups, as defined in this section in the quantities specified in the meal pattern in paragraph (c) of this section: K-12: 1/2 C bean/peas/legumes.</p>
<p style="text-align: center;"><b>SFA Suggested Guidance for Compliance</b></p>
<p>Recommendations: review all planned menus to ensure that they meet the minimum weekly vegetable sub-group requirements on serving line.</p> <p>To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all weekly requirements for grains are met for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.</p>
<p style="text-align: center;"><b>SFA Response</b></p>

<p style="text-align: center;"><b>Finding #18</b></p>
<p>For the week of menu review, the K-8 lunch menu did not meet the minimum weekly requirement of 1/2 cup other vegetable subgroup.</p>
<p style="text-align: center;"><b>Technical Assistance Provided</b></p>
<p>During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. This includes meeting the weekly requirements for the vegetables sub-groups. Over the course of the standard school week the SFA must at a minimum meet the required servings for each subgroup. The SFA should review all menus to ensure that at least the minimum serving for each sub-group is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. <a href="http://healthymeals.nal.usda.gov/">http://healthymeals.nal.usda.gov/</a></p>
<p style="text-align: center;"><b>Regulation / Citation Summary</b></p>
<p>210.10(c)(iii) Vegetables component. Vegetable offerings at lunch over the course of the week must include the vegetable subgroups, as defined in this section in the quantities specified in the meal pattern in paragraph (c) of this section: K-8: 1/2 C other vegetable.</p>



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### SFA Suggested Guidance for Compliance

Recommendations: review all planned menus to ensure that they meet the minimum weekly vegetable sub-group requirements on serving line.

To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all weekly requirements for grains are met for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

### SFA Response

### Finding #19

For the week of menu review, the K-8 lunch menu did not meet the minimum weekly requirement of 8 ounce equivalent grain.

### Technical Assistance Provided

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement meet the weekly requirements as well as the daily requirements for grains required for the specific grade group. The SFA should review all menus to ensure that at least the minimum daily and weekly requirement is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include how to determine the total number of weekly servings if there are multiple menu items each day. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. <http://healthymeals.nal.usda.gov/>

### Regulation / Citation Summary

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: K-8: minimum of 8 oz. equivalent of grains per week.

### SFA Suggested Guidance for Compliance

The school must modify the lunch menu to include at least eight grain equivalents per week for grade k-8. The school must provide the State Agency with a copy of the updated menu and/or recipes to support the 8 grain equivalent.

Recommendations: Review all planned menus to ensure that they meet the minimum weekly grain requirements.

### SFA Response



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<b>Finding #20</b>
Based on the targeted menu review, the menu for grade group K-8 did not meet the dietary specification for sodium for lunch.
<b>Technical Assistance Provided</b>
During the review, appropriate sodium ranges were discussed with the SFA. The menus must meet the sodium requirements for the menus to be in compliance with the dietary specifications. The sodium requirements for lunch are: K-5: <1,230, 6-8: <1,360; K-8: <1,230; 9-12: <1,420.
<b>Regulation / Citation Summary</b>
210.10(f)(3) Sodium. Schools lunches offered to each age/grade group must meet, on average over the school week, the levels of sodium specified: K-5: <1,230, 6-8: <1,360; K-8: <1,230; 9-12: <1,420.
<b>SFA Suggested Guidance for Compliance</b>
Provide the State Agency with a plan for review and reduction of higher sodium menu items offered.
Recommendations: Keep high sodium entrees offered to two or less per week.
<b>SFA Response</b>

<b>Finding #21</b>
For the week of menu review, the K-8 lunch menu did not meet the 100% Whole Grain Rich requirement for grains. Not all grains provided were Whole Grain Rich.
<b>Technical Assistance Provided</b>
During the review requirements for the meal pattern were reviewed with the SFA. All grains provided as part of the reimbursable meal must be Whole Grain Rich. The be considered Whole Grain Rich the item it must be comprised of at least 50% whole grain ingredients. An easy way to determine if a pre-purchased item is whole grain is to look at the ingredient list. If the first ingredient is whole grain, it is a Whole Grain Rich product. If the first ingredient is water, but the second is a whole grain it is also a Whole Grain Rich product. If the SFA is using a recipe as long as the whole grain ingredient is the largest by weight of all of the grain ingredients combined it is a Whole Grain Rich product. For additional information on whole grains visit the USDA FNS website. <a href="http://healthymeals.nal.usda.gov/menu-planning/whole-grains">http://healthymeals.nal.usda.gov/menu-planning/whole-grains</a>
<b>Regulation / Citation Summary</b>
210.10(c)(2)(iv) Grains component. (A) Enriched and whole grains. All grains must be made with enriched and whole grain meal or flour, in accordance with the most recent grains FNS guidance. Whole grain-rich products must contain at least 50 percent whole grains and the remaining grains in the product must be enriched.
<b>SFA Suggested Guidance for Compliance</b>
The school must modify the lunch menu to include all whole grain products or request a whole grain waiver from the State Agency.
Recommendations: Review all menu items offered to ensure that they are whole grain rich.
<b>SFA Response</b>



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### Finding #22

For the week of menu review, the K-8 lunch menu did not meet the minimum daily requirement of 1 ounce equivalent meat/meat alternate. The menu component analysis failed to verify that the daily and weekly meat/meat alternate component was provided.

#### Technical Assistance Provided

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern.  
<http://healthymeals.nal.usda.gov/>

#### Regulation / Citation Summary

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: K-8: 1 oz. equivalent meat/meat alternate.

#### SFA Suggested Guidance for Compliance

The school must ensure that all entrée items offered provide the minimum meat/meat alternate equivalent per day.

Recommendations: Review all planned menus and recipes to ensure that they meet the minimum meat/meat alternate. All entrees served should have a CN label or manufacturer product statement to verify the meat/meat alternate component.

#### SFA Response

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### Finding #23

Based on the targeted menu review, the menu for grade group K-8 did not meet the dietary specification for sodium for lunch.

#### Technical Assistance Provided

During the review, appropriate sodium ranges were discussed with the SFA. The menus must meet the sodium requirements for the menus to be in compliance with the dietary specifications. The sodium requirements for lunch are: K-5: <1,230, 6-8: <1,360; K-8: <1,230; 9-12: <1,420.

#### Regulation / Citation Summary

210.10(f)(3) Sodium. Schools lunches offered to each age/grade group must meet, on average over the school week, the levels of sodium specified: K-5: <1,230, 6-8: <1,360; K-8: <1,230; 9-12: <1,420.

#### SFA Suggested Guidance for Compliance

The school should review the lunch menu items offered for sodium content and reduce the higher sodium products offered. Provide the State Agency with a plan for review and reduction of higher sodium menu items.





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Recommendations: Keep high sodium entrees offered to two or less per week.

### SFA Response

### Finding #24

For the week of menu review, the 9-12 lunch menu did not meet the 100% Whole Grain Rich requirement for grains. Not all grains provided were Whole Grain Rich.

### Technical Assistance Provided

During the review requirements for the meal pattern were reviewed with the SFA. All grains provided as part of the reimbursable meal must be Whole Grain Rich. To be considered Whole Grain Rich the item it must be comprised of at least 50% whole grain ingredients. An easy way to determine if a pre-purchased item is whole grain is to look at the ingredient list. If the first ingredient is whole grain, it is a Whole Grain Rich product. If the first ingredient is water, but the second is a whole grain it is also a Whole Grain Rich product. If the SFA is using a recipe as long as the whole grain ingredient is the largest by weight of all of the grain ingredients combined it is a Whole Grain Rich product. For additional information on whole grains visit the USDA FNS website. <http://healthymeals.nal.usda.gov/menu-planning/whole-grains>

### Regulation / Citation Summary

220.8(c)(2)(iv) Grains component. (A) Enriched and whole grains. All grains must be made with enriched and whole grain meal or flour, in accordance with the most recent FNS guidance on grains. Whole grain-rich products must contain at least 50 percent whole grains and the remaining grains in the product must be enriched. Effective July 1, 2013 (SY 2013-2014), schools may substitute meats/meat alternates for grains, after the daily grains requirement is met, to meet the weekly grains requirement. One ounce equivalent of meat/meat alternate is equivalent to one ounce equivalent of grains.

### SFA Suggested Guidance for Compliance

The school must modify the lunch menu to include all whole grain products or request a whole grain waiver from the State Agency.

Recommendations: Review all menu items offered to ensure that they are whole grain rich.

### SFA Response

### Finding #25

For the week of menu review, the 9-12 lunch menu did not meet the minimum daily requirement of 2 ounce equivalent grain. A grain was provided, however the minimum required portion size was not met.

### Technical Assistance Provided

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the



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requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern.

<http://healthymeals.nal.usda.gov/>

### Regulation / Citation Summary

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: 9-12: 2 oz. equivalent daily grain.

### SFA Suggested Guidance for Compliance

The school must modify the lunch menu to include at least two grain equivalent per day for grades 9-12. The school must provide the State Agency with a copy of the updated menu.

Recommendations: Review all planned menus to ensure that they meet the minimum daily grain requirement on all serving lines.

### SFA Response

### Finding #26

For the week of menu review, the 9-12 lunch menu did not meet the minimum weekly requirement of 10 ounce equivalent grain.

### Technical Assistance Provided

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement meet the weekly requirements as well as the daily requirements for grains required for the specific grade group.

The SFA should review all menus to ensure that at least the minimum daily and weekly requirement is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include how to determine the total number of weekly servings if there are multiple menu items each day. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. <http://healthymeals.nal.usda.gov/>

### Regulation / Citation Summary

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: 9-12: minimum of 10 oz. equivalent of grains per week.

### SFA Suggested Guidance for Compliance

Corrective Action: The school must modify the lunch menu to include at least ten grain equivalents per week for grade 9-12. The school must provide the State Agency with a copy of the updated menu and/or recipes to support the 2 grain equivalent requirement for grades 9-12.

Recommendations: Review all planned menus to ensure that they meet the minimum weekly grain requirement.

### SFA Response



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### Finding #27

For the week of menu review, the 9-12 lunch menu did not meet the minimum weekly requirement of 10 ounce equivalent meat/meat alternate. The menu component analysis failed to verify that the daily and weekly meat/meat alternate component was provided.

### Technical Assistance Provided

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement meet the weekly requirements as well as the daily requirements for meat/meat alternates required for the specific grade group. The SFA should review all menus to ensure that at least the minimum daily and weekly requirement is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include how to determine the total number of weekly servings if there are multiple menu items each day. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. <http://healthymeals.nal.usda.gov/>

### Regulation / Citation Summary

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: 9-12: minimum of 10 oz. equivalent of meat/meat alternate per week.

### SFA Suggested Guidance for Compliance

Corrective Action: The school must ensure that all entrée items offered provide the minimum meat/meat alternate equivalent per day.

Recommendations: Review all planned menus and recipes to ensure that they meet the minimum meat/meat alternate. All entrees served should have a CN label or manufacturer product statement to verify the meat/meat alternate component.

### SFA Response

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### Finding #28

The school is not following the grade grouping as identified in the HHFKA of 2010. when serving multiple menus and/or age/grade groups.

### Technical Assistance Provided

During the review, serving multiple age/grade groups was discussed with the SFA. The SFA must ensure, if multiple age/grade groups are served, that menus are planned to meet the requirements of the meal pattern for each age/grade group that is served. If there are different menus served to the different grade groups with the same meal service the SFA must determine the changes that need to be made and how to determine which student receive which menu. For example if the K-5 student come through first and then the 6-8 students come through the serving line then the kitchen staff can make adjustments to portions between the different grade groups. Using different serving spoons or measuring cups may be all that is needed to meet the requirements depending on the menu offered.



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### Regulation / Citation Summary

210.10(c)(1) Age/grade groups. Schools must plan menus for students using the following age/grade groups: Grades K-5 (ages 5-10), grades 6-8 (ages 11-13), and grades 9-12 (ages 14-18). If an unusual grade configuration in a school prevents the use of these established age/grade groups, students in grades K-5 and grades 6-8 may be offered the same food quantities at lunch provided that the calorie and sodium standards for each age/grade group are met. No customization of the established age/grade groups is allowed.

### SFA Suggested Guidance for Compliance

The students in 7<sup>th</sup> & 8<sup>th</sup> grade must be offered the portion sizes for their grade group. Currently they are being offered portions equivalent to the 9-12 grade grouping

Recommendations: Provide the same portion size for 7<sup>th</sup> & 8<sup>th</sup> grade that are offered in K-6 grade.

### SFA Response

### Finding #29

For the week of menu review, the 9-12 lunch menu did not meet the minimum weekly requirement of 3/4 cup other vegetable subgroup.

### Technical Assistance Provided

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. This includes meeting the weekly requirements for the vegetables sub-groups. Over the course of the standard school week the SFA must at a minimum meet the required servings for each subgroup. The SFA should review all menus to ensure that at least the minimum serving for each sub-group is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. <http://healthymeals.nal.usda.gov/>

### Regulation / Citation Summary

210.10(c)(iii) Vegetables component. Vegetable offerings at lunch over the course of the week must include the vegetable subgroups, as defined in this section in the quantities specified in the meal pattern in paragraph (c) of this section: 9-12: 3/4 C other vegetable.

### SFA Suggested Guidance for Compliance

Recommendations: Review all planned menus to ensure that they meet the minimum weekly vegetable sub-group requirements on all serving lines.

The school must modify the lunch menu to include at least 1/2 cup of dark green, 1 1/4 cup red/orange, 1/2 cup bean/pea, 1/2 cup starchy, 3/4 cup other vegetable per week for grades 9-12. The school must provide the State Agency with a copy of the updated menu and/or vegetable recipes to identify compliance.

### SFA Response



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### Finding #32

Offer vs. Serve is not being implemented properly. The SFA was not implementing Offer versus Serve for the required 9-12 grade group. 9-12 grade group was being served all food components and additional items were put out as an option.

### Technical Assistance Provided

Requirements under Offer vs. Service include that Senior high schools must participate in Offer vs. Serve. During the review, it was determined that the SFA was not implementing Offer vs. Serve for their 9-12 grade group students. The requirements as well as the finding were reviewed with the SFA. Discussed that OvS students only have to take 3 of the 5 components but can take all 5 if wanted; not all 5 plus additional options.

### Regulation / Citation Summary

210.10 (e) Offer versus serve. School lunches must offer daily the five food components specified in the meal pattern in paragraph (c) of this section. Under offer versus serve, students must be allowed to decline two items at lunch, except that the students must select at least 1/2 cup of either the fruit or vegetable component. Senior high schools (as defined by the State educational agency) must participate in offer versus serve. Schools below the senior high level may participate in offer versus serve at the discretion of the school food authority.

### SFA Suggested Guidance for Compliance

To come into compliance with the requirements of Offer vs. Serve, the SFA must submit a written process that has been put in to place to ensure Offer vs Serve is now being implemented correctly. In addition to the new process the SFA must also provide the name and title of the SFA representative that will ensure compliance with this finding moving forward, an outline of the training that was provided to staff to inform them of the requirements and the new process and the date the training was completed.

### SFA Response

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Signature of Reviewer: \_\_\_\_\_ Date: \_\_\_\_\_  
Signature of SFA Representative: \_\_\_\_\_ Date: \_\_\_\_\_

**If you have any questions, feel free to contact me at your convenience. Thank you.**

**Name of Reviewer: Laura Henry, Staff Manager  
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Email:**

Please insert your detailed responses, save, print, sign, and scan/email or mail the signed copy to your Reviewer at the address above by the due date indicated. Thank you.