



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

Name of School Food Authority:	SFA South Valley Preparatory
School Site(s) reviewed:	Sites Reviewed South Valley Preparatory
Date of On-Site Review:	Date May 9, 2018
Date Corrective Action Plan Was provided to SFA:	Date July 13, 2018
Date your Corrective Action Plan Response is due to NMPED:	Due Date August 13, 2018

COMMENDATIONS

PERFORMANCE STANDARD 1
SFA had Provision 2 documentation and state letter of base year.

PERFORMANCE STANDARD 2
SFA is doing a good job at feeding students locally grown food.
Students really enjoyed their food and there was very little food waste.

GENERAL AREAS

Other areas of Technical Assistance (NOT requiring Corrective Action)

- Ensure that there is always two different types of milk offered during the meal service.
- Provided non-discrimination statement that should be on all program material including menu. Short statement for menu.
- Both a breakfast and lunch poster need to be displayed in the lunchroom showing what constitutes a reimbursable meal.
- Discussed ways SFA can reduce food cost. SFA is losing money by purchasing local and organic.



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

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

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

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

Finding #1
The SFA is operating an alternate point of service without State Agency approval. The POS was at the beginning of the line and not the end of the line.
Technical Assistance Provided
During the review, alternate points of service were discussed with the SFA. The SFA is operating alternate points of service without State Agency approval. To be in compliance, the SFA must move the POS to the end of the line where a reimbursable meal can be determined or receive approval from the State Agency prior to operating an alternate point of service. The SFA acknowledged the finding and will implement needed changes immediately.
Regulation / Citation Summary
210.7(c)2) Point of service alternatives. (i) State agencies may authorize alternatives to the point of service lunch counts provided that such alternatives result in accurate, reliable counts of the number of free, reduced price and paid lunches served, respectively, for each serving day. State agencies are encouraged to issue guidance which clearly identifies acceptable point of service alternatives and instructions for proper implementation. School food authorities may select one of the State agency approved alternatives without prior approval. (ii) In addition, on a case-by-case basis, State agencies may authorize school food authorities to use other alternatives to the point of service lunch count; provided that such alternatives result in an accurate and reliable lunch count system. Any request to use an alternative lunch counting method which has not been previously authorized under paragraph (2)(i) is to be submitted in writing to the State agency for approval. Such request shall provide detail sufficient for the State agency to assess whether the proposed alternative would provide an accurate and reliable count of the number of lunches, by type, served each day to eligible children. The details of each approved alternative shall be maintained on file at the State agency for review by FNS.
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, along with a request for the alternate point of service approval. The plan must include the name and title of the SFA representative that will ensure compliance moving forward. Additionally, SFA staff will need to complete the Meal Counting and Claiming training found in the School Nutrition Toolbox at http://www.schoolnutritiontoolbox.org/snt-v3/index.php .
SFA Response



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

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Finding #2

The school did not meet the minimum weekly vegetable sub-group requirement for the week of review.

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; 1/2 C bean/peas/legumes; 1/2 C of other; 1/2 C starchy; 3/4 C red/orange.

SFA Suggested Guidance for Compliance

The school must modify the lunch menu to include at least 1/2 cup of dark green, 3/4 cup red/orange, 1/2 cup bean/pea, 1/2 cup starchy, 3/4 cup other vegetable per week for grades K-8. The school must provide the State Agency with a copy of the updated menu, recipes and production records to identify compliance. Review all planned menus to ensure that they meet the minimum weekly vegetable sub-group requirements. The week of review was missing 1/4 c bean/pea and 1/8 c starchy vegetable. Modification of the recipes and/or serving size is needed to meet the weekly vegetable sub-group requirements.

SFA Response

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Finding #3

The production records are incomplete, not all required fields are correctly documented. Leftover information and comments such as added orange slices were not added to production record.

Technical Assistance Provided

During the review, production records were discussed with the SFA. The SFA must ensure that all sites are keeping accurate and complete production records for the meals they produce. The records must be completed throughout meal service and maintained everyday. At a minimum the production records should include the name of the item, the recipe or item number, the portion size, the number of planned portions, the component contribution amount



New Mexico Public Education Department

Student Success & Wellness Bureau

Administrative Review Corrective Action Plan

and the number of actual servings. All kitchen staff should be trained on completing productions records so that everyone can complete the records.
Regulation / Citation Summary
210.10(a)(3) Production and menu records. Schools or school food authorities, as applicable, must keep production and menu records for the meals they produce. These records must show how the meals offered contribute to the required food components and food quantities for each age/grade group every day. Labels or manufacturer specifications for food products and ingredients used to prepare school meals must indicate zero grams of trans fat per serving (less than 0.5 grams). Schools or school food authorities must maintain records of the latest nutritional analysis of the school menus conducted by the State agency. Production and menu records must be maintained in accordance with FNS guidance
SFA Suggested Guidance for Compliance
To bring this area into compliance the SFA must submit a written assurance that includes; a statement that the SFA is aware of the production records requirement, a statement that production records will be maintained for all meals produced, a process for completing the productions records, and a statement that additional training will be provided to the SFA staff, include the training outline and the dates that the trainings will be held. 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 a week of completed production records for review.
SFA Response

Finding #4
For the week of menu review, the 6-8 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: 6-8: minimum of 8 oz. equivalent of grains per week.
SFA Suggested Guidance for Compliance
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 and meat/meat alternates 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



New Mexico Public Education Department

Student Success & Wellness Bureau

Administrative Review Corrective Action Plan

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 #5

Based on the targeted menu review, the menu for grade group 6-8 did not meet the dietary specification for saturated fat for lunch.

Technical Assistance Provided

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.

Regulation / Citation Summary

210.10(f)(2) Saturated fat. School lunches offered to all age/grade groups must, on average over the school week, provide less than 10 percent of total calories from saturated fat.

SFA Suggested Guidance for Compliance

Recommendations: Decrease the offerings of higher saturated fat items such as cheese and add more lean meat/meat alternate entrée items.

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.

SFA Response

Finding #6

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 Provided



New Mexico Public Education Department

Student Success & Wellness Bureau

Administrative Review Corrective Action Plan

During the on-site 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.

Regulation / Citation Summary

210.30(d) Continuing education/training standards for all staff with responsibility for school nutrition programs.

Each school year, the school food authority must ensure that all staff with responsibility for school nutrition programs that work an average of at least 20 hours per week, other than school nutrition program directors and managers, completes annual training in areas applicable to their job. For the school year beginning July 1, 2015, staff must complete four hours of annual training. Beginning July 1, 2016, six hours of annual training are required. Part-time staff working an average of less than 20 hours per week must complete four hours of annual training beginning July 1, 2015. The annual training must include, but is not limited to, the following topics, as applicable to their position and responsibilities: (1) Free and reduced price eligibility; (2) Application, certification, and verification procedures; (3) The identification of reimbursable meals at the point of service; (4) Nutrition; (5) Health and safety standards; and (6) Any specific topics identified by FNS, as needed, to address Program integrity or other critical issues.

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 the appropriate training is completed and the dates of all future trainings.

SFA Response

Finding #7

The SFA is not tracking training hours.

Technical Assistance Provided

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



New Mexico Public Education Department

Student Success & Wellness Bureau

Administrative Review Corrective Action Plan

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Finding #8

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 Provided

During the on-site 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.

Regulation / Citation Summary

210.30(b)(3) Continuing education/training standards for all school nutrition program directors. Each school year, the school food authority must ensure that all school nutrition program directors, (including acting directors, at the discretion of the State agency) complete annual continuing education/training. For the school year beginning July 1, 2015, program directors must complete eight hours of annual training. Beginning July 1, 2016, twelve hours of annual training are required. The annual training must include, but is not limited to, administrative practices (including training in application, certification, verification, meal counting, and meal claiming procedures), as applicable, and any other specific topics identified by FNS, as needed, to address Program integrity or other critical issues. Continuing education/training required under this paragraph is in addition to the food safety training required in the first year of employment under paragraph (b)(1)(v) of this section.

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 the appropriate training is completed and the dates of all future trainings.

SFA Response

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Finding #9

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 Provided

During the review the requirement for the most current civil rights statement to appear on all Program material was discussed with the SFA. The SFA must use the most current statement on all Program material. Per USDA requirements the new Non-discrimination statement must be on all program materials no later than September 30, 2016. The SFA was provided with the USDA link to the new non-discrimination statement. <http://www.fns.usda.gov/fns-nondiscrimination-statement>

Regulation / Citation Summary

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



New Mexico Public Education Department

Student Success & Wellness Bureau

Administrative Review Corrective Action Plan

<p>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.</p>
<p style="text-align: center;">SFA Suggested Guidance for Compliance</p>
<p>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.</p>
<p style="text-align: center;">SFA Response</p>

<p style="text-align: center;">Finding #10</p>
<p>The SFA is not implementing their food safety plan.</p>
<p style="text-align: center;">Technical Assistance Provided</p>
<p>During the review, the food safety plan was discussed with the SFA. The SFA must have a food safety plan that complies with the requirements as outlined in 7 CFR 210.13(c), and the SFA must ensure that all elements of the plan are implemented. The SFA should be following the procedures as outlined in the plan and maintaining all required records.</p>
<p style="text-align: center;">Regulation / Citation Summary</p>
<p>210.13(c) Food safety program. The school food authority must develop a written food safety program that covers any facility or part of a facility where food is stored, prepared, or served. The food safety program must meet the requirements in paragraph (c)(1) or paragraph (c)(2) of this section, and the requirements in §210.15(b)(5). (1) A school food authority with a food safety program based on traditional hazard analysis and critical control point (HACCP) principles must: (i) Perform a hazard analysis; (ii) Decide on critical control points; (iii) Determine the critical limits; (iv) Establish procedures to monitor critical control points; (v) Establish corrective actions; (vi) Establish verification procedures; and (vii) Establish a recordkeeping system. (2) A school food authority with a food safety program based on the process approach to HACCP must ensure that its program includes: (i) Standard operating procedures to provide a food safety foundation; (ii) Menu items grouped according to process categories; (iii) Critical control points and critical limits; (iv) Monitoring procedures; (v) Corrective action procedures; (vi) Recordkeeping procedures; and (vii) Periodic program review and revision.</p>
<p style="text-align: center;">SFA Suggested Guidance for Compliance</p>
<p>To come into compliance with the requirements for food safety, the SFA must provide the State Agency with an assurance that the appropriate staff understand the requirements for implementing the food safety plan. The assurance should include; a statement that the food safety plan will be implemented at each site, a statement that proper documentation practices will be established at each site, and that training will be completed for all appropriate SFA staff. Provide the agenda and sign-in sheets from the trainings.</p>
<p style="text-align: center;">SFA Response</p>



New Mexico Public Education Department

Student Success & Wellness Bureau

Administrative Review Corrective Action Plan

Finding #11
Temperature logs are not being kept on file for at least 6 months.
Technical Assistance Provided
During the on-site review, temperature logs were discussed with the SFA. The SFA must maintain temperature logs for all food storage areas, in accordance with the requirements of the local health department. The completed temperature logs must be kept on file for a minimum of 6 months.
Regulation / Citation Summary
210.15(b)(5) The SFA must maintain records from the food safety program for a period of six months following a month's temperature records to demonstrate compliance with §210.13(c), and records from the most recent food safety inspection to demonstrate compliance with §210.13(b).
SFA Suggested Guidance for Compliance
To come into compliance with the requirements for food safety, the SFA must provide the State Agency with an assurance that the appropriate staff understand the requirements for food safety documentation. The assurance should include; a statement that the food safety plan will be implemented at each site, a statement that proper documentation practices will be established at each site, a statement that all temperature documents will be maintained for a minimum of 6 months, and that training will be completed for all appropriate SFA staff. Provide the agenda and sign-in sheets from the trainings.
SFA Response

Finding #12
Offer versus Serve is not being implemented correctly. Some meals were incomplete due to insufficient quantities offer and/or selected by the students.
Technical Assistance Provided
Requirements under Offer vs. Serve include that the SFA must offer the five food components specified in the meal pattern, and students must be allowed the option to deny two items, except that they must take at least a 1/2 cup of either the fruit or vegetable component or 1/2 cup combination of fruit and vegetable. During the review, it was determined that the SFA is not following these requirements. The requirement as well as examples of the findings and possible solutions were reviewed with the SFA.
Regulation / Citation Summary
210.10 (e) Offer versus serve. School lunches must offer daily the five food components specified in the meal pattern in paragraph (c) of this section. Under offer versus serve, students must be allowed to decline two items at lunch, except that the students must select at least 1/2 cup of either the fruit or vegetable component. Senior high schools (as defined by the State educational agency) must participate in offer versus serve. Schools below the senior high level may participate in offer versus serve at the discretion of the school food authority.
SFA Suggested Guidance for Compliance
To come into compliance with the requirements of Offer vs. Serve, the SFA must submit a written process that has been put in to place to ensure Offer vs Serve is now being implemented correctly. 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.



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

SFA Response	

Signature of Reviewer: _____ Date: _____

Signature of Nutritionist _____ Date: _____
Signature of SFA Representative: _____ Date: _____

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

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