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Christopher N. Ruszkowski Susana Martinez
Secretary of Education Governor

Administrative Review Summary and Corrective Actions

SFA Name:	Tohaali ¹ Community School
SFA Code/ ID Number:	635000
Administrative Review Conducted on:	Monday, February 13, 2017
SFA Contact Name and Title:	Dorothy Martinez/Supervisor
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 13, 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 (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

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Administrative Review Technical Assistance Summary

SFA Name:	Tohaali' Community School
SFA Code/ID Number:	635000
Administrative Review Conducted on:	Monday, February 13, 2017
SFA Contact Name and title:	Dorothy Martinez/Supervisor
CNR Reviewer:	Gavin Mack

Commendations & Suggestions

Outstanding job meeting all of the requirements for both breakfast and lunch. All daily and weekly meal component and food quantity requirements were met for the week of menu review.

Staff was very kind and accommodating.

They do a great job running the program.

Other areas of Technical Assistance (Does NOT require SFA Response)

Menu Review- the production records do not always provide adequate information as recorded. Be sure menus and production records are accurate and updated to include what was actually served daily. There were several menu items that were not served and were listed on the menu and production records. The menu and many production records did not include daily menu substitutions.

Menu Review- meal pattern crediting is not always accurate as recorded on the recipes that were submitted. Verify the crediting information on your recipes. For example, the following recipes have crediting that is not accurate: the amount of vegetables in the beef vegetable soup, the amount of meat/meat alternate in the chicken noodle soup, and amount of vegetable in the chili. The meal pattern requirements are met, this is just for your information.

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

Local Wellness Policy - During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to perform an assessment of the Local Wellness Policy at a minimum once every three years. The results of the assessment need to be made available to the public. The SFA should use the results of the assessment to determine any changes or updates that need to be made to the wellness policy.

Local Wellness Policy - During the review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to be made available to the public. The easiest method would be to post the wellness policy on the SFAs website. They can also send it out in a newsletter.

Resource Management - Adult Meal Deposits

Money orders for adult meal sales should be submitted in a timely manner. During the review, it was determined that the SFA waited long periods of time before submitting the deposits. Adult meal sales from SY 16-17 were not submitted until the following school year. It is suggested that cash is deposited on a weekly basis, if possible. The business technician should confirm that the revenues were properly recorded to the food service revenue code in the accounting system.



Required Corrective Actions- Review Areas
New Mexico Public Education
Coordinated School Health & Wellness
Administrative Review Corrective Action Plan

SFA Name: Tohaali' Community School
 SFA Code/ID: 635000

Administrative Review Conducted: Monday, February 13, 2017
 Site(s) Selected for Review: Tohaali' Community School

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: 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:			
<ul style="list-style-type: none"> •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 			
<i>For detailed regulation see: 210.12(d) Outreach activities. (2)</i>			
Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a written statement that the SFA will cooperate with Summer Food Service Program sponsors to conduct outreach on the availability of the Summer Food Service Program.			

Finding #2: Afterschool Snack Program			
The program was not monitored within the first 4 weeks of operation and is not monitored twice per year.			
Technical Assistance			
During the review, program monitoring was discussed with the SFA. The SFA must monitor the program within the first 4 weeks of operation and twice per year.			
For detailed regulation see: 210.9(c) Afterschool care requirements.			
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 monitor the Afterschool Snack Program twice per year, and once within the first 4 weeks of operation.			
4. The SFA must also complete the monitoring reviews and submit them or, if early in the year, must provide the date when monitoring will occur.			

Finding #3: Meal Counting and Claiming			
The point of service did not provide an accurate meal count by eligibility status. This is a non-systemic error. The SFA was using tray counts as the POS for breakfast on the day of review due to being short staffed. All meals observed were reimbursable.			
Technical Assistance			
To be in compliance, the SFA must ensure that meal counts taken at the point of service correctly identify the number of free, reduced priced and paid lunches served. Tracking students accurately at the point of service was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.			
For detailed regulation see: 210.7(c)(1) Lunch count system.			
Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide the new/revised process, in writing, that will be implemented at the point of service to ensure accurate meal counts by category.			

Finding #4: 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 free student per-meal reimbursements and the value of commodities received. The SFA should be charging at least \$3.55 (\$3.31 USDA reimbursement + \$.2325 commodities). The SFA's adult lunch price of \$3.00 is not meeting this requirement. 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:

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			
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 #5: Resource Management

The SFA could not demonstrate that adult meal revenues accrued to the food service account.

Technical Assistance

The SFA did not provide all the documents requested for the Nonprogram Food section of the resource management comprehensive review. The SFA needs to provide documentation showing that the adult meal collections were sent to the BIE and properly recorded to the SFA's food service revenue account (167A2100FF). The SFA needs to submit the documentation showing the deposits collected from the August 2017 adult meal sales (such as a deposit slip or money order), and the revenue report showing the sales accrued to the food service revenue account.

For detailed regulation see:

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide documentation showing the adult meal deposits received from the August 2017 adult meal sales, such as deposit slips or money orders.			
2. Provide a revenue report showing the adult meal sales were deposited to the food service account.			

Finding #6: Resource Management

The SFA offers nonprogram adult meals for free, including meals to lunch monitors, parents, and visitors.

Technical Assistance

Only food service employees may eat for free at the cost of the food service program. Any other staff members, visiting adults, or "lunch duty" staff must pay for the full cost of their meal, as outlined in FNS Instruction 782-5. If they will not be charged directly, the food service program must be reimbursed for the full cost of these meals. The SFA should bill the department or organization that will pay for the free meals and ensure the non-federal funds are received by the food service program. These meals should accrue as nonprogram revenue to the food service account. Per FNS Instruction 782-5, the SFA should be charging at least \$3.55 (\$3.31 USDA reimbursement + \$.2325 commodities). The SFA was sent a copy of the October 2015 PED memo concerning Program Adult Meals. This memo clarifies that lunch duty staff cannot eat for free, as they do not meet the definition of a program adult.

For detailed regulation see:

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide assurance that the SFA has discontinued their policy of offering free nonprogram adult meals to lunch monitors, parents, and visitors.			
2. If another department/budget will pay for the nonprogram meals instead of directly charging the adults, explain: 1) The source of the nonfederal funds (the general fund, outside organization, etc.). 2) The frequency at which the food service program will be reimbursed (weekly, monthly, etc.). 3) The rate the food service program will charge for these meals.			

Finding #7: Resource Management

The SFA does not separate nonprogram food costs from program food costs.

Technical Assistance

The food service program used funds from the nonprofit school food service to purchase food or beverages for dinners, snacks for away-game sport events, and dorm activities such as cocoa night and movie night, but was not reimbursed for these purchases. This is an unallowable use of food service funds.

If nonprogram foods are purchased through the food service account, the expenses incurred must be reimbursed to the food service account. The food service department should separate the nonprogram (non-reimbursable) food purchases in the accounting ledger, and either reimburse the food service account or charge the expenses to a different budget. Only allowable costs for the USDA Child Nutrition Programs may be charged to the food service account.

For detailed regulation see:

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

1. Provide a written statement of understanding that all nonprogram food expenses incurred by the food service program will be repaid in full. This includes any non-reimbursable foods such as dinners, desserts, snacks for sports games, and dorm activity snacks.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Submit an explanation on how the National School Lunch Program, Student Breakfast Program, and Afterschool Snack Program expenses will be separated from nonprogram foods purchased by the SFA for non-reimbursable meals and snacks. This could include separating the reimbursable meal food from the non-reimbursable meal food on the purchase invoices, recording the non-reimbursable meal food to a separate expense account or fund, tracking the non-reimbursable meal food in a spreadsheet, etc.			

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: _____

Date: _____

Signature of CN Resource Reviewer: _____

Date: _____

February 13, 2017

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



Administrative Review Team

CN Resource

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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>