



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

Name of School Food Authority: **Wingate High School**
School Site(s) reviewed: Wingate High School

Date of On-Site Review: **13, April, 2018**

Date Corrective Action Plan Was provided to SFA: **18, May, 2018**

Date your Corrective Action Plan Response is due to NMPED: 18, June, 2018

COMMENDATIONS

PERFORMANCE STANDARD 1
SFA is classified under Community Eligibility Provision. SFA showed all documentation regarding the established percentages with regard to their Identified Student Percentages or ISP.
SFA had proper documentation of their Public Release
SA verified that the FNS-742 Report had been conducted in a timely manner

PERFORMANCE STANDARD 2
SFA accommodated students with Special Dietary Needs
Production records continuously maintained as required
Two types of fluid milk offered at each meal service

GENERAL AREAS
SFA Wellness Policy in compliance with USDA regulations
SFA in compliance with Civil Rights and Professional Standards training
Potable water available and free

Other areas of Technical Assistance (NOT requiring Corrective Action)

- **SFA was given Technical Assistance with updating their Civil Rights Poster in the dining area.**
- **SFA needed some TA with administering their On-Site Monitoring forms.**



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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
- The finding, and details specific to the SFA regarding the finding
- The Code of Federal Regulations citation number or alternate resource citation
- 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

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

Finding #1
The SFA does not conduct a daily edit check for each meal service.
Technical Assistance Provided
During the review, edit checks were discussed with the SFA. The SFA does not conduct a daily edit check for each meal service. To be in compliance, the SFA must ensure that edit checks are completed daily. How to complete edit checks to ensure meal counts do not exceed attendance adjusted eligible and/or total enrollment was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.
Regulation / Citation Summary
210.8(a)(3) Edit checks. (i) The following procedure shall be followed for school food authorities identified in paragraph (a)(2)(ii) of this section, by other school food authorities at State agency option, or, at their own option, by school food authorities identified in paragraph (a)(2)(i) of this section: the school food authority shall compare each school's daily counts of free, reduced price and paid lunches against the product of the number of children in that school currently eligible for free, reduced price and paid lunches, respectively, times an attendance factor.
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. The plan must include: an indication that the SFA is now conducting a daily edit check for each meal service, a description of the new process that has been implemented, a description of the training that was provided to staff to inform them of the new process, the date the training was completed and 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 and submit one week of completed edit checks.
SFA Response



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Finding #2
For the week of menu review, the 9-12 lunch menu did not meet the minimum daily requirement of 1 cup vegetable. Vegetables were 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 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: 1 cup of vegetable.
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 portion sizes planned meet at least the minimum required amount 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 #3
<p>For the week of menu review, the 9-12 lunch menu did not meet the minimum weekly requirement of 1 1/4 cup red/orange vegetable subgroup.</p>
Technical Assistance Provided
<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. http://healthymeals.nal.usda.gov</p>
Regulation / Citation Summary
<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: 9-12: 1 and 1/4 C red/orange.</p>
SFA Suggested Guidance for Compliance
<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>
SFA Response



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Finding #4

On the day of review, the 9-12 lunch menu did not meet the 2 ounce equivalent daily meat/meat alternate requirement. A meat/meat alternate 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 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 meat/meat alternate.

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 portion sizes planned meet at least the minimum required amount 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 day of review with the corrections that were made to the menu to bring it into compliance moving forward.

SFA Response



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Finding #5
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.
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
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 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 #6
The SFA is not implementing their food safety plan. SFA is not calibrating their thermometer.
Technical Assistance Provided
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.
Regulation / Citation Summary
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.
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 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.
SFA Response



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Finding #7
Storage violations were observed on-site. The SFA had food that was opened and not dated with date opened.
Technical Assistance Provided
During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated once opened.
Regulation / Citation Summary
<p>210.13(a) Health standards. The school food authority shall ensure that food storage, preparation and service is in accordance with the sanitation and health standards established under State and local law and regulations.</p> <p>210.13(d) (d) Storage. The school food authority shall ensure that the necessary facilities for storage, preparation and service of food are maintained. Facilities for the handling, storage, and distribution of purchased and donated foods shall be such as to properly safeguard against theft, spoilage and other loss.</p>
SFA Suggested Guidance for Compliance
To come into compliance with this finding the SFA must submit an assurance that the SFA is aware of the requirements for food storage and holding within the food safety guidelines. The assurance must include: a statement that all food and chemicals will be kept separately; a statement that all food items will be dated with the delivery date as well as the date the product was opened; a statement that all food will be stored at least 6 inches off of the floor; and a statement that all storage areas including coolers, freezers and storage rooms will be kept within the allowable temperature ranges. The assurance should also include a statement that temperature logs will be maintained for all storage areas. Submit copies of completed temperature logs with the corrective action response.
SFA Response



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Finding #8
The meal service operation was not in compliance with all program requirements. The number of snacks was not accurately counted.
Technical Assistance Provided
During the review, the requirements for properly counting snacks were discussed with the SFA. The SFA must take and maintain accurate snack meal counts. This finding may result in fiscal action.
Regulation / Citation Summary
Afterschool Snacks in the National School Lunch Program (NSLP) and the At-Risk Component of the Child and Adult Care Food Program (CACFP), Questions and Answers, Edition 3: Accurate meal count records must be maintained.
SFA Suggested Guidance for Compliance
To come into compliance with the requirement to count and maintain accurate snack meal counts, the SFA must provide an assurance that staff administering the Afterschool Care Snack Program understand this requirement, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan. The plan must include the person by position who will ensure the number of snacks is counted correctly. The State Agency will determine the correct number of snacks that may be claimed for the day of review.
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: Jerome Armijo. Health Educator
Student Success & Wellness Bureau
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Santa Fe, NM 87501
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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.