

**State of New Mexico**  
**Public Education Department**  
300 Don Gaspar  
Santa Fe, New Mexico 87501-2786  
Telephone (505) 827-5800  
[www.ped.state.nm.us](http://www.ped.state.nm.us)

Christopher N. Ruskowski      Susana Martinez  
Secretary of Education      Governor

**Administrative Review Summary and Corrective Actions**

SFA Name:	Zuni Public Schools
SFA Code/ ID Number:	089000
Administrative Review Conducted on:	Tuesday, February 13, 2018
SFA Contact Name and Title:	Joy Bobelu, FSD
CNR Reviewer:	Danielle Reidy

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 (Menu and Review) require a written response and must be submitted in writing to CN Resource, by **Wednesday, April 11, 2018**. Please complete the responses electronically. If any additional responses are needed, please respond on district letterhead. In addition to responding to the findings please ensure that additional training is provided to all staff to bring all finding areas into compliance. Failure to submit the required materials by the due date may result in the withholding of claims. Should corrective actions not be submitted, a follow-up review may take place to ensure all required corrective actions were completed and implemented system-wide as appropriate.

Any potential fiscal action will be calculated once the corrective action responses have been received and approved.

I appreciate the courtesies extended by you and your personnel during the review. If you have questions or need assistance concerning the school food service program, please call our office. Please respond to the Administrative Review Corrective Actions by **Wednesday, April 11, 2018**.

Thank you,



**Casey O'Neill, RD, SNS, Senior Child Nutrition Specialist**

**CN Resource**  
**1930 N Arboleda, 101, Mesa, Arizona 85213**  
**p 866 941.6368 f 480 325.9967**

## Administrative Review Technical Assistance Summary

SFA Name:	Zuni Public Schools
SFA Code/ID Number:	089000
Administrative Review Conducted on:	Tuesday, February 13, 2018
SFA Contact Name and title:	Joy Bobelu, FSD
CNR Reviewer:	Danielle Reidy

### Commendations & Suggestions

Outstanding job meeting all of the requirements for breakfast. All daily and weekly meal component and food quantity requirements were met for the week of menu review for the breakfast menu.
The site does a great job serving a high volume of students in a friendly and efficient manner.
The food service staff was open to all suggestions and showed a willingness to learn about the Program.

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

Menu Review- technical assistance was provided in an email to the SFA with the menu review results. Suggestions were provided to bring the menus into compliance.
Meal Counting and Claiming - During the review, edit checks were discussed with the SFA. 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.
Meal Counting and Claiming - During the review, training for cashiers and substitute cashiers was discussed. The SFA does not provide annual training to cashiers and substitute cashiers. It is recommended that the SFA provide training annually or as needed to cashiers and substitute cashiers.
Local School 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.
Food Safety - During the review, the food safety plan was discussed with the SFA. The SFA must have a food safety plan available at each site so that food service staff may stay in compliance with food safety requirements and procedures.
Food Safety - During the review, health inspections were discussed with the SFA. The SFA must post a copy of the most recent food safety inspection in a publicly visible location at the site.
Buy American - During the review, Buy American requirements were discussed with the SFA. The SFA must purchase, to the maximum extent practicable, domestic commodities or products. "Domestic commodity or product" is defined as an agricultural commodity that is produced in the U.S. and a food product that is processed in the U.S. substantially using agricultural commodities produced in the U.S. There are limited exceptions to the Buy American provision which allow for the purchase of foods not meeting the "domestic" standard in circumstances when use of domestic foods is truly not practicable. The SFA must keep documentation justifying the limited exception(s). These exceptions, as determined by the SFA, are: <ul style="list-style-type: none"> <li>• The product is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality; or</li> <li>• Competitive bids reveal the costs of a U.S. product are significantly higher than the non-domestic product.</li> </ul>

Resource Management - 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 for adult lunches (\$3.31 USDA reimbursement + \$.2325 commodities). The SFA's adult lunch price of \$3.50 is slightly below this requirement. Adult breakfasts are also slightly underpriced (\$2.09 for the current year). The SFA should reevaluate adult meal prices every year based on the USDA reimbursement rate plus the value of commodities.

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>

SFA Name: Zuni Public Schools	Site(s) Selected for Review: 1 <i>Shiwi Tsana Elementary</i>	NSLP Grade Group: K-5	SBP Grade Group: K-5	<input type="checkbox"/> N/A
SFA ID Number: 089000	2 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
Week of Menu Review: 1/8/18 - 1/12/18	3 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A

### Menu Review Findings: Lunch

#### Site 1:

For the week of menu review and the day of review, the lunch menu did not meet the minimum daily vegetable requirement. Vegetables were offered daily, however the minimum required portion size was not met.

#### Technical Assistance

During the Administrative Review the results of the menu review were provided in a detailed Menu Review Results Report. Recommendations were included to bring all areas into compliance. All menus served within the SFA for the National School Lunch Program must meet all daily and weekly meal pattern requirements for the specific grade group. The SFA was encouraged to provide training as needed to ensure compliance. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews, may result in fiscal action.

*For detailed regulations see: 7 CFR 210.10*

Required Criteria for Response to Findings	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide a written statement that the daily vegetable requirement is now met. Include details to describe what specific changes were made to the menu to correct all menu review findings and bring the menu into compliance.			
2. Submit any necessary documentation to demonstrate that the menu findings listed under step 1 are now corrected. This documentation may include: production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes. Reference the menu review results report for specific details and suggestions to bring the menu into compliance.			
3. List the steps that will be taken when a site does not have one of the planned menu items or there are insufficient quantities on the serving day.			
4. Provide a written statement that the serving line will be visually reviewed prior to service to confirm that all required components are available.			
5. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.			



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

SFA Name: Zuni Public Schools  
 SFA Code/ID: 089000

Administrative Review Conducted: Tuesday, February 13, 2018  
 Site(s) Selected for Review: Shiwi Tsana Elementary  
N/A  
N/A

Date Corrective Action Plan was provided to SFA: 3/12/2018

Due Date for Corrective Action Plan: 4/11/2018

The following pages address the findings that were identified during the Administrative Review. There is an area for a response for each finding.

***Please enter the detailed response for each in the spaces provided .***

Finding #1: Civil Rights			
The SFA is using the incorrect civil rights statement. They are using an outdated version of the statement.			
Technical Assistance			
During the review the requirement for the civil rights statement to appear on all Program material was discussed with the SFA. The SFA must use the statement on all Program material.			
For detailed regulation see: FNS Instruction 113-1 IX A 3 Nondiscrimination Statement.			
Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a written statement that the non-discrimination statement has been added to all nutrition program materials.			
4. Provide a copy of a menu to show that the correct non-discrimination statement has been added.			

Finding #2: Civil Rights			
The SFA did not submit a public release.			
Technical Assistance			
During the review the requirement for a public release to be submitted for publishing was discussed with the SFA. At or near the beginning of each year, the SFA must submit a public release to the local media, the unemployment office and any major employers who are contemplating large layoffs in the attendance area of the school.			

<i>For detailed regulation see: §245.5(a)(1) Public Release</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 statement of assurance that a public release will be submitted for publishing at or near the beginning of each school year.			

### Finding #3: Civil Rights

The SFA did not provide the yearly civil rights training for the appropriate staff.

#### Technical Assistance

During the on-site review the requirement to provide a yearly civil rights training was discussed with the SFA. The SFA must provide civil rights training at least once a year to all frontline staff and supervisor and maintain all required documentation.

*For detailed regulation see: FNS Instruction 113-1 Section XI Training*

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 civil rights training to all appropriate staff.			
4. Provide a statement of assurance that civil rights training will be provided annually to all appropriate staff.			
5. Provide a copy of the sign in sheet for the training.			

### Finding #4: SFA On-site Monitoring

On-site monitoring was not completed for all or some of the sites within the SFA for breakfast and lunch .

#### Technical Assistance

During the review, the requirement for on-site monitoring was reviewed with the SFA. It was determined that the SFA is not completing on-site monitoring for all or some of the sites within the SFA. Since the SFA has multiple sites, they are required to monitor the lunch counting and claiming system for each site in the SFA prior to February 1st of each year. The SFA was provided with the link to the USDA memo that includes a sample monitoring form. If the SFA chooses to create their own monitoring form, at a minimum it must include all information that is on the USDA monitoring form. <https://fns-prod.azureedge.net/sites/default/files/cn/SP56-2016os.pdf>

*For detailed regulation see: 210.8(a)(1) On-site reviews and 220.11(d)(1)On-site reviews*

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 all on-site monitoring will be completed for all sites by February 1, each year moving forward.			
4. Provide the on-site monitoring forms that have been completed for the current school year.			

#### Finding #5: Professional Standards

The School Nutrition Program Director, Manager and school nutrition staff did not meet the training requirements, and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements.

#### Technical Assistance

During the review, annual training hour requirements were discussed with the SFA. To be in compliance, the SFA must ensure that all school nutrition staff complete the required amount of training annually. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

*For detailed regulation see: 210.30(b)(3) Continuing education/training standards for program director; 210.30(c) Continuing education/training standards for program managers; 210.30(d) Continuing education/training standards for all staff*

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. List the names, length, and date of trainings that have been completed/planned to meet the required training hours.			

#### Finding #6: Professional Standards

The SFA is not tracking training hours.

#### Technical Assistance

During the review, training requirements were discussed with the SFA. To be in compliance, the SFA must track the hours of training completed by all School Nutrition staff. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

*For detailed regulation see: 210.30(g) School food authority oversight.*

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			

2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a statement of understanding that the SFA must track the hours of training completed by all School Nutrition staff.			
4. Provide a copy of the tracker that will be used by the SFA.			

### Finding #7: Special Provisions

The SFA did not maintain documentation on file to support the Identified Student Percentage.

### Technical Assistance

During the review, having the proper documentation for all Identified Students was discussed with the SFA. To be in compliance, the SFA must maintain source documentation for all directly certified students, such as direct certification lists and/or other lists certifying that students are categorically eligible for free school meals, including lists of students who are designated as homeless or migrant, as well as total student enrollment.

*For detailed regulation see: SP 15-2016: CEP State Agency Procedures*

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 keep all proper documentation used to establish the Identified Student Percentages and claiming percentages.			

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: *Danielle Reidy*

Date: February 13, 2018

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



Administrative Review Team

CN Resource  
P.O. Box 31060  
Mesa, AZ 85275  
866-941-6368





## 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>