



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

Name of School Food Authority: Coral  
 Community Charter

School Site(s) reviewed:	Coral Community Charter
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Date of On-Site Review:	<b>Date: 11/5/2018</b>
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Date Corrective Action Plan Was provided to SFA:	<b>Date: 12/03/2018</b>
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**Date your Corrective Action Plan Response is due to NMPED:** **Due Date: January 11, 2019**

**COMMENDATIONS**

PERFORMANCE STANDARD 1
Meal counts maintained and consolidated correctly.

PERFORMANCE STANDARD 2
Accommodation of special dietary needs;

GENERAL AREAS
Use of civil rights statement on program paperwork; Acquiring professional standard requirements;

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

- Recommended use of USDA Professional Standards Training Tracker Tool.
- Update NSLP application to reflect actual breakfast and lunch start times.
- Post menu in more visible and accessible area for students (change made while on-site).
- Suggested use of hairnet. \* Coral Community Charter falls under the City of Albuquerque Environmental Health Department jurisdiction; Per conversation with Health Inspector, "Food Service handlers must use an effective hair restraint, defined as ponytail or braid."- Confirmed that they are not in violation per City of Albuquerque Environmental Health Department.



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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>
For the menu review week, all meal choices did not have all required meal components available. The breakfast menu offered to the K-12 grade group did not contain a fruit. This finding may result in fiscal action due to incomplete meals being counted for reimbursement.
<b>Technical Assistance Provided</b>
During the review, the components of 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 all required components are offered. 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>
<b>Regulation / Citation Summary</b>
220.8(c) Meal pattern for school breakfasts. A school must offer the food components and quantities required in the breakfast meal pattern established. K-12: 1 C of fruit daily.
<b>SFA Suggested Guidance for Compliance</b>
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, a process for sites to reference when they do not have one of the



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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 #2

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

### Technical Assistance Provided

The school must modify the lunch menu to include at least 3/4 cup of vegetables daily. The school must provide the State Agency with a copy of the updated menu and vegetable recipes to certify compliance prior to the beginning of SY 2020; the SFA's menus will remain out of compliance until reviewed and approved by PED staff.

### Regulation / Citation Summary

210.10(c)(2)(iii) Vegetables component. Schools must offer vegetables daily as part of the lunch menu. Fresh, frozen, or canned vegetables and dry beans and peas (legumes) may be offered to meet this requirement.

### SFA Suggested Guidance for Compliance

Review all planned menus to ensure that they meet the minimum weekly vegetable sub-group requirements. Remove all vegetable sub-group crediting for condiments (i.e. Ketchup).

### SFA Response

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### Finding #3

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

### Technical Assistance Provided

The school must modify the lunch menu to include at least 1/2 cup of dark green vegetables. The school must provide the State Agency with a copy of the updated menu and vegetable recipes to certify compliance prior to the beginning of SY 2020; the SFA's menus will remain out of compliance until reviewed and approved by PED staff.

### Regulation / Citation Summary

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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: 3/4 cup of vegetable.
<b>SFA Suggested Guidance for Compliance</b>
Review all planned menus to ensure that they meet the minimum weekly vegetable sub-group requirement. Remove all vegetable sub-group crediting for condiments (i.e. Ketchup).
<b>SFA Response</b>
<b>Finding #4</b>
The total weekly lunch calories exceeded the target range of 600-650 calories.
<b>Technical Assistance Provided</b>
The school should review the lunch menu items offered and limit higher calorie lunch items offered throughout the week. Provide the State Agency with a plan for review of higher calorie menu items.
<b>Regulation / Citation Summary</b>
210.10(f) Dietary specifications— (1) Calories. School lunches offered to each age/grade group must meet, on average over the school week, the minimum and maximum calorie levels specified: K-5: 550-650, 6-8: 600-700, 9-12: 750-850.
<b>SFA Suggested Guidance for Compliance</b>
Limit the serving size of condiments (i.e. Ranch Dressing) to 1 TBSP per student.
<b>SFA Response</b>

<b>Finding #5</b>
The total weekly saturated fat exceeded the target of less than 10%.
<b>Technical Assistance Provided</b>
The school should review the lunch items offered and decrease the offering of higher saturated fat food items.
<b>Regulation / Citation Summary</b>
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.
<b>SFA Suggested Guidance for Compliance</b>
Decrease the offerings of higher saturated fat items such as cheese and processed meats, and limit the serving size of condiments (i.e. Ranch Dressing) to 1 TBSP per student.
<b>SFA Response</b>



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<b>Finding #6</b>
Offer versus Serve is not being implemented correctly.
<b>Technical Assistance Provided</b>
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.
<b>Regulation / Citation Summary</b>
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.
<b>SFA Suggested Guidance for Compliance</b>
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 at the senior high school(s). 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.
<b>SFA Response</b>

<b>Finding #7</b>
Not all selected applications were approved correctly. The SFA did not calculate the income and household size correctly.
<b>Technical Assistance Provided</b>
During the review, determining applications was discussed with the SFA. When determining eligibility, the SFA must ensure that the household has listed the amounts, source, and frequency of current income for each household member; otherwise, the application is incomplete. For more information, see the Eligibility Manual for School Meals, Chapter 3. When determining the total household income the SFA must use all income provided on the application.
<b>Regulation / Citation Summary</b>



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245.6(c)(4) Calculating income. The local educational agency must use the income information provided by the household on the application to calculate the household's total current income. When a household submits an application containing complete documentation, as defined in §245.2, and the household's total current income is at or below the eligibility limits specified in the Income Eligibility Guidelines as defined in §245.2, the children in that household must be approved for free or reduced price benefits, as applicable.

### **SFA Suggested Guidance for Compliance**

To come into compliance with the requirements for determining applications, the SFA must provide the State Agency with an assurance that staff administering the free and reduced lunch program 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.

Applications found to be incorrectly determined during the review must be corrected, and the corrected application and date of the correction must be submitted to the State Agency. If the

SFA is unable to correct the error because of missing/incomplete information from the household, after allowing the household an adequate amount of time to respond, the SFA must send a letter of adverse action and advise the State Agency of the date that this letter was sent.

### **SFA Response**

### **Finding #8**

Storage violations were observed on-site. The SFA had food that was not dated upon delivery. 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 upon delivery.

### **Regulation / Citation Summary**

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.

### **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 #9

The SFA does not have a Local School Wellness Policy.

### 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 policy 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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Signature of Reviewer: Vanessa Martinez Date: 3 December, 2018  
Signature of SFA Representative: \_\_\_\_\_ Date: \_\_\_\_\_

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

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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.