



New Mexico Public Education Department

Student Success & Wellness Bureau

Administrative Review Corrective Action Plan

Name of School Food Authority: **Health Leadership High School**

School Site(s) reviewed: **Health Leadership High School**

Date of On-Site Review: **30, October, 2018**

Date Corrective Action Plan Was provided to SFA: **31, December, 2018**

Date your Corrective Action Plan Response is due to NMPED: 31, January, 2019

COMMENDATIONS

PERFORMANCE STANDARD 1
SFA claims are maintained and submitted according to FNS requirements
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 in compliance with the Buy American Provision
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 (TA) with their edit check process and applying the correct attendance factor percentage.**
- **TA was given with providing the up to date Civil Rights poster in the meal service area and throughout the school.**

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



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- 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 have a Local School Wellness Policy.
Technical Assistance Provided
<p>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.</p>
Regulation / Citation Summary
<p>210.30 Local School Wellness Policy. (c) Content of the plan. At a minimum, local school wellness policies 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.</p>



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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

Finding #2

The SFA is not implementing their food safety plan. SFA is not calibrating their digital 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



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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

Finding #3

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).



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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 #4
The SFA is not maintaining a medical statement on file for students with special dietary needs that do not rise to the level of a disability.
Technical Assistance Provided
During the review, medical statements were discussed with the SFA. The medical statement for students with special dietary needs that do not rise to the level of a disability must be signed by a physician, physician assistant, nurse practitioner, or other professional specified by the State agency.
Regulation / Citation Summary
Accommodating Children With Special Dietary Needs In The School Nutrition Programs: School food authorities, institutions or sponsors may, at their discretion, make substitutions for individual participants who are not "handicapped persons", as defined in 7 CFR Part 15b.3(i), but who are unable to consume a food item because of medical or other special dietary needs. Such substitutions may only be made on a case-by-case basis when supported by a statement signed by a recognized medical authority. For these nonhandicapped participants, the supporting statement shall include: A. An identification of the medical or other special dietary need which restricts the participant's diet; and B. The food or foods to be omitted from the participant's diet, and the food or choice of foods that may be substituted.



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SFA Suggested Guidance for Compliance

To come into compliance with this requirements for special dietary needs, the SFA must provide the State Agency with an assurance that appropriate staff understand the requirement, and the SFA must put a plan in place to ensure future compliance. The plan must include the SFA's process for students that have life threatening allergies and the SFA's process for student with special dietary needs that do not rise to a level of a disability. Each process should include; the type of documentation that must be maintained on file, how the sites will be informed of the child's specific needs, the process that will be used to ensure that the SFA is meeting the requirements for both groups of dietary needs, and the name and title of the SFA representative that will oversee compliance.

SFA Response



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Signature of
Reviewer:

Date: 1/3/19

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
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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.