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<https://webnew.ped.state.nm.us/bureaus/student-success-wellness/>

Howie C. Morales
Lieutenant Governor

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Governor

Administrative Review Summary and Corrective Actions

SFA Name:	Chaves County Juvenile Detention Center
SFA Code/ ID Number:	004001
Administrative Review Conducted on:	Tuesday, February 26, 2019
SFA Contact Name and Title:	Lt. Pete Hernandez, Delia Gurrola
CNR Reviewer:	Casey O'Neill

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on 2/26/19; 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 **Friday May 3, 2019**. 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 **Friday May 3, 2019**.

Thank you,



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

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Administrative Review Technical Assistance Summary

SFA Name:	Chaves County Juvenile Detention Center
SFA Code/ID Number:	004001
Administrative Review Conducted on:	Tuesday, February 26, 2019
SFA Contact Name and title:	Lt. Pete Hernandez, Delia Gurrola
CNR Reviewer:	Casey O'Neill

Commendations & Suggestions

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

Great job serving all whole grain-rich products for the week of menu review!

RCCI's with safety concerns can apply for a waiver with PED to be able to serve the 9-12 meal pattern to all program participants. Contact PED for more information.

SFA was open to all technical assistance provided to make sure they were properly following the guidelines.

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

Menu Review- the SFA must ensure that Child Nutrition labels or Product Formulation Statements for processed products are being maintained in order to document an item's compliance with the meal pattern. The SFA should have a folder or a binder to keep labels for all menu items, this allows for easy reference when determining menu compliance. Vendor labels were submitted from Sysco for most food products. Please secure manufacturer labels.

Civil Rights - During the review the requirement for the "And Justice for All" poster were discussed with the SFA. The poster must be on display in all serving/dining areas, the poster must be displayed in a location that is visible to students was discussed with the SFA, and the poster must be 11" wide x 17" high. The SFA was provided with a copy of the current "And Justice for All" poster and posted it in a publicly visible location on the day of review. No further action required.

Local School Wellness Policy - 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. As the SFA has adopted the policy from Roswell School District, the SFA needs to make sure the policy is labeled as their own and does not contain language from Roswell School District in it.

Local School Wellness Policy - The SFA has an example assessment at the end of its policy, but has not filled it out. 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.

Resource Management - The SFA should compile an annual food service financial report showing all food service revenues (USDA reimbursements) and food service expenditures (food, supplies, labor, equipment, etc.). This report should show the profit/deficit for the year, as well as the breakdown between program (SBP, NSLP, snack program) and nonprogram (nonreimbursable dinners) food costs. The SFA must ensure federal funds are only used to pay for program costs.

SFA Name: <i>Chaves County Juvenile Detention Center</i>	Site(s) Selected for Review: 1 <i>Chaves County Juv. Det. Center</i>	NSLP Grade Group: 6-8, 9-12	SBP Grade Group: K-12	<input type="checkbox"/> N/A
SFA ID Number: <i>004001</i>	2 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
Week of Menu Review: <u>1/7/19 - 1/13/19</u>	3 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A

Menu Review Findings: Lunch

1. For the week of menu review, the 9-12 lunch menu did not meet the minimum daily requirement for meat/meat alternate. A meat/meat alternate was offered daily, however the minimum required portion size was not met.
2. For the week of menu review, the 9-12 lunch menu did not meet the minimum daily requirement for grain. A grain was 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 grain and meat/meat alternate requirements are 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.			
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**New Mexico Public Education
Student Success & Wellness Bureau
Administrative Review Corrective Action Plan**

SFA Name: Chaves County Juvenile Detention Center
SFA Code/ID: 004001

Administrative Review Conducted: Tuesday, February 26, 2019
Site(s) Selected for Review: Chaves County Juv. Det. Center
N/A
N/A

Date Corrective Action Plan was provided to SFA: 4/3/2019

Due Date for Corrective Action Plan: 5/3/2019

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: Meal Counting and Claiming			
The SFA has claimed meals in error based on inaccurate counting and/or claiming procedures. The counts by category were not correctly used in the claim for reimbursement. This is a systemic error. The SFA was claiming based on the number enrolled and not the number served.			
Technical Assistance			
During the review, counting and claiming were discussed with the SFA. The SFA has claimed meals in error based on inaccurate counting and/or claiming procedures. The counts by category were not correctly used in the claim for reimbursement. To be in compliance, the SFA must ensure that meal counts are being recorded accurately and that claims are being filed correctly. Proper counting and claiming procedures were reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.			
For detailed regulation see: 210.7(c) Reimbursement limitations.			
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 detailed explanation of the new/revised process that will be implemented at the point of service to ensure an accurate counting and claiming system.			

Finding #2: Meal Components and Quantities	
Signage is not posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal for breakfast and lunch. Offer versus Serve reimbursable meal signage is not posted, including the requirement for students to select at least 1/2 cup fruit or vegetable	

Technical Assistance

During the review, the importance of signage was discussed with the SFA. The SFA must ensure that signage is posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal. The requirement for Offer versus Serve meal signage was reviewed with the SFA. Requirements include identifying, near or at the beginning of the serving line(s), the food items that constitute a reimbursable meal, including the requirement that students must take at least 1/2 cup of the fruit or vegetable component.

For detailed regulation see: 220.8(a)(2) Unit pricing.

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 that meal signage has been posted.			

Finding #3: Afterschool Snack Program

The program was not monitored within the first 4 weeks of operation. The program 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. The monitoring form can be found at: <https://webnew.ped.state.nm.us/wp-content/uploads/2018/09/Afterschool-Snack-Program-Monitoring-Form.pdf>

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.			
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			
4. The SFA must also complete the monitoring reviews and submit them or, if early in the year, must provide the date when monitoring			

Finding #4: Meal Components and Quantities

The lunch meal service is not structured to comply with the required age/grade group meal pattern requirements when serving multiple menus and/or age/grade groups.

Technical Assistance

During the review, serving multiple age/grade groups was discussed with the SFA. The SFA must ensure, if multiple age/grade groups are served, that menus are planned to meet the requirements of the meal pattern for each age/grade group that is served. RCCI's with safety concerns can apply for a waiver with PED to be able to serve the 9-12 meal pattern to all program participants.

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.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a statement that includes; a statement that all menus will be reviewed to ensure that all required components are planned in the minimum portion size required for the grade group.			

Finding #5: Resource Management

Federal funds were used to pay for non-reimbursable meals served for free.

Technical Assistance

Federal funds received from reimbursements of meals claimed under the SBP & NSLP were partially used to pay for the non-reimbursable juvenile dinners served by the SFA. The SFA's reimbursable food costs for the year were \$16,876 and nonreimbursable food costs were \$7,137. The SFA received a total of \$18,873 from USDA reimbursements. These revenues were used to pay for all of the program meal costs and the remaining funds (\$1,996) were used to offset costs of the nonreimbursable meals.

Nonreimbursable meal costs cannot be absorbed with federal funds. Federal funds should only be used to operate/improve the child nutrition programs (SBP, NSLP). Any federal funds remaining after paying for the reimbursable breakfast, lunches, and snacks must accumulate in the food service account and be spent on allowable costs to operate/improve the child nutrition programs. The SFA should pay for nonreimbursable meals with general (non-federal) funds. If the SFA incurs other allowable costs to operate/improve the child nutrition programs, such as labor, supplies, equipment, etc., the SFA should charge these expenses to the food service account.

For detailed regulation see: 7 CFR 210.14(a) Nonprofit school food service

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Explain how the SFA will ensure federal funds are not used to pay for nonreimbursable meals.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			

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: Casey O'Neill

Date: February 26, 2019

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>