

**State of New Mexico
Public Education Department**

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Howie C. Morales
Lieutenant Governor

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Governor

Administrative Review Summary and Corrective Actions

SFA Name:	Clayton Municipal Schools
SFA Code/ ID Number:	084000
Administrative Review Conducted on:	Tuesday, February 12, 2019
SFA Contact Name and Title:	Cassy Scott, Food Service Department Manager
CNR Reviewer:	Sarah Thomas

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on February 12, 2019; 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 10, 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 **Wednesday, April 10, 2019**.

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:	Clayton Municipal Schools
SFA Code/ID Number:	084000
Administrative Review Conducted on:	Tuesday, February 12, 2019
SFA Contact Name and title:	Cassy Scott, Food Service Department Manager
CNR Reviewer:	Sarah Thomas

Commendations & Suggestions

The POS at Alvis Elementary ran very quickly and smoothly. The employee documenting the meals had a great relationship with students.

The cafeteria staff is eager to use more scratch cooking for their menus and include local preferences into their menu creation process.

Thank you for completing the paid lunch equity tool, and for raising paid lunch prices as required.

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

Menu Review- recipes are not standardized, and not all are in written standardized format. Items on the menu that need standardized recipes include the Breakfast Burrito and Hot Roll recipe, which did not include a yield. This information was obtained from the sponsor in order to complete the menu review.

Standardize the recipes so that true yields and portion sizes can be determined. To be standardized recipes must include:

- All ingredients in recipe.
- Correct measures and specific weight/measure of each ingredient.
- Serving/portion size(s) for each age/grade group.
- The true yield made by recipe.
- Clear and complete preparations steps / directions.

Certification and Benefit Issuance - The SFA is not date stamping applications with the date received. Upon reviewing applications, they are being processed within a ten-day window. Provided technical assistance.

Verification - Provided technical assistance regarding confirmation reviews that confirmation reviews must either be conducted on 100% of applications or only those selected for verification.

Resource Management - The SFA incorrectly reported paid lunch prices to PED. The SFA did not update the site application with the new paid lunch price of \$2.40. The issue was corrected during the review, and the SFA was advised to implement a review process of the site application to ensure accurate pricing data is submitted to the State Agency in the future.

Required Corrective Actions- Menu Review

SFA Name: Clayton Municipal Schools
 SFA ID Number: 084000
 Week of Menu Review: 1/14/19/- 1/18/19

Site(s) Selected for Review:

1 Alvis Elementary School	NSLP Grade Group: K-5	SBP Grade Group: K-12	<input type="checkbox"/> N/A
2 N/A	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
3 N/A	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A

Menu Review Findings: Lunch

1. For the week of menu review, the lunch menu did not meet the minimum daily and weekly requirements for grain. A grain was offered daily, however the minimum daily and weekly requirements were not met.
2. For the week of menu review, the 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.
3. For the week of menu review, the lunch menu did not meet the whole grain-rich requirement
4. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the dark green vegetable subgroup.

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 and weekly grain, daily meat/meat alternate, whole grain-rich, and dark green vegetable subgroup 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.			

Menu Review Findings: Breakfast

For the week of menu review, the breakfast menu did not meet the whole grain-rich requirement.

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 School Breakfast 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 220.10

Required Criteria for Response to Findings	SFA Response	CNR Internal	
		Appv	Intls.
1. Provide a written statement that the whole grain-rich 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
Student Success & Wellness Bureau
Administrative Review Corrective Action Plan

SFA Name: Clayton Municipal Schools
 SFA Code/ID: 084000

Administrative Review Conducted: Tuesday, February 12, 2019
 Site(s) Selected for Review: Alvis Elementary School
N/A
N/A

Date Corrective Action Plan was provided to SFA: 3/11/2019

Due Date for Corrective Action Plan: 4/10/2019

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: Certification and Benefit Issuance			
Changes are not being made to the point of service benefit issuance document in an appropriate manner to reflect the 30 days of carryover eligibility. Students are only given 20 days of rollover.			
Technical Assistance			
During the review, properly handling the status of children for whom an application has not been submitted was discussed with the SFA. A student is only eligible for carryover benefits if during the previous school year they were enrolled within the SFA and were receiving free or reduced meal benefits. Additionally, if a new student is enrolled in the SFA and they have other household members that attended in the previous year, the carryover status may be extended to this child. Carryover status applies for the first 30 operating days of the school year or until a new application is approved, whichever comes first.			
For detailed regulation see: 245.6(c) Application, eligibility and certification			
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 plan to ensure that changes to the point of service will be made when new current school year meal benefit information is obtained and if nothing is received, the status will be changed to paid after the 30 day carryover period expires.			

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Finding #2: Certification and Benefit Issuance

The SFA does not have a procedure for extending free school meal eligibility to all children who are members of a household in which one person in that household is receiving SNAP, TANF, or FDPIR benefits, as the SFA is not making the required effort to the extent possible to identify additional children in these households.

Technical Assistance

During the review, documenting extended eligibility was discussed with the SFA. Per USDA the SFA must make an effort, to the extent possible, to identify additional children in the same household of those certified for assistance program benefits. The SFA must base extended eligibility on allowable records as outlined in USDA memo SP 25-2010. The SFA must maintain documentation for extended eligibility, the SFA may use a variety of methods to maintain this documentation. Some SFAs, write the name of the student that the benefits are extended to next to the student from the same household on the direct certification list. In this case the SFA should document the date added, the SFA representative's signature or initials with the name of the added student. Other SFAs maintain a consolidated list of students that have been extended eligibility, in this case the list includes: the name of the student, the name of the student that eligibility is extended through, and the date added.

For detailed regulation see: SP 25-2010: Q&A on Extending Categorical Eligibility

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 will extend eligibility from one student to other household members only based			

Finding #3: Certification and Benefit Issuance

The SFA annualized income when it should have been determined at its stated frequency. In some cases when applications indicated multiple income frequencies, the income was not appropriately annualized. The SFA did not use the correct conversion factors for applications with more than one income frequency.

Technical Assistance

During the review, making determinations based on the stated frequency was discussed with the SFA. When determining eligibility, the SFA may not annualize income unless income sources are listed at different frequencies. If there are multiple income sources with more than one frequency, the LEA must annualize, that is, calculate all income as for an entire year, by multiplying: Weekly income by 52; or Bi-weekly income (received every two weeks) by 26; or Semi-monthly income (received twice a month) by 24; or Monthly income by 12. When determining eligibility, the SFA must utilize the correct income version factors as outlined in the Eligibility Manual for School Meals, Chapter 3. If there are multiple income sources with more than one frequency, the LEA must annualize, that is, calculate all income as for an entire year, by multiplying: Weekly income by 52; or Bi-weekly income (received every two weeks) by 26; or Semi-monthly income (received twice a month) by 24; or Monthly income by 12.

For detailed regulation see: 245.6(c)(4) Application, eligibility and certification

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.

Required Corrective Actions- Review Areas

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 income will not be annualized when it should be determined at its stated frequency			
4. Provide a statement of understanding that income will be annualized correctly when more than one income frequency is on an application.			
5. Provide a statement of understanding that income will be calculated using the correct conversion factors when more than one income frequency is on an application.			

Finding #4: Certification and Benefit Issuance

Not all selected applications were approved correctly. Not all income based applications included the last four digits of the social security number of an adult household member, or an indication of none. Not all applications included the names of all household members or a discrepancy in household size was present.

Technical Assistance

During the review, determining applications was discussed with the SFA. When determining eligibility, the SFA must ensure that the household has included the last four digits of the social security number of an adult household member (or an indication of none); otherwise, the application is incomplete. Discussed that when a discrepancy in household count is indicated on the application, clarification must be sought. For more information, see the Eligibility Manual for School Meals, Chapter 3.

For detailed regulation see: Eligibility Manual, Chapter 3: Establishing Eligibility

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 the staff approving applications understand the requirements.			
4. Describe how all applications will be determined correctly moving forward.			
5. Provide copies of the letters to the household(s) if there is a change in eligibility status.			

Finding #5: Certification and Benefit Issuance

Not all selected applications had documentation to support the eligibility determination.

Technical Assistance

During the review, determining applications and maintaining appropriate documentation was discussed. All determining documentation must be retained by the SFA.

For detailed regulation see: For detailed regulation see: Eligibility Manual, Chapter 3: Establishing Eligibility

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 all eligibility determinations will be supported by the appropriate documentation.			

Finding #6: Verification

The confirming official may not also be the determining official.

Technical Assistance

During the review the SFA was informed that the confirming official may not also be the determining official. The SFA should review the current Income Eligibility Manual for additional verification requirements. The SFA was also reminded that the hearing official may not be the determining, confirming, nor the verifying official.

For detailed regulation see: 245.6a(e)(1)(i) Confirmation

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 confirming official will not also be the determining official.			
4. Provide the person(s) by position(s) who will be the determining official for all applications, the confirming official for verification, and the verifying official.			

Finding #7: Verification

The SFA's verification process is not being conducted according to USDA guidelines. The SFA did not establish the sample pool accurately by selecting from error-prone applications.

Technical Assistance

During the review, establishing the sample pool was discussed with the SFA. The SFA must establish the sample pool exactly as described in the Eligibility Manual for School Meals, Chapter 4.

For detailed regulation see: Eligibility Manual, Chapter 4A

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 steps the SFA will take to establish the sample pool for verification.			

Finding #8: Verification

Not all applications selected for review were verified correctly. The SFA did not determine the correct eligibility based on household income provided and using net, rather than gross income.

Technical Assistance

During the review, properly determining the correct eligibility, based on household income and size, was discussed with the SFA. To determine eligibility, the SFA must follow the procedures for processing applications and submitted eligibility documents as outlined in the Eligibility Manual for School Meals, Chapter 3, as well as the procedures for verifying applications as outlined in Chapter 4.

For detailed regulation see: Eligibility Manual Chapter 2A

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 will determine applications selected for verification based on the net household income.			

Finding #9: 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 or lunch.

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.

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 #10: 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.

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.

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 to ensure an accurate counting and claiming system.			

Finding #11: 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.

For detailed regulation see: §245.5(a)(1) Public Release

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 #12: Civil Rights

The SFA does not have a procedure in place for handling civil rights complaints.

Technical Assistance

During the review the requirement for the SFA to have a complaint procedure was discussed. The procedure must indicate: that any person or representative alleging discrimination based on a prohibited basis has the right to file a complaint; all complaints, written or verbal, must be forwarded to the appropriate Regional or FNS OCR Director, unless an approved State complaint procedure is in place; in the event a complainant makes the allegations verbally or in person and refuses or is not inclined to place such allegations in writing, the person to whom the allegations are made must write up the elements of the complaint for the complainant. The procedure must also identify the outside agency to which the complaints are forwarded.

For detailed regulation see: FNS Instruction 113-1 Section XV Complaint 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 written procedure for how the SFA will handle any alleged civil rights complaints.			

Finding #13: Professional Standards

The School Nutrition Program Director 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 the School Nutrition Program Director completes 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 directors.

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 #14: Professional Standards

The 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, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that the 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(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 #15: 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 #16: Professional Standards

The employees outside of the school nutrition program whose responsibilities include duties related to the operation of the school nutrition program did not receive training applicable to their duties related to the program.

Technical Assistance

During the review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that employees outside of the School Nutrition programs (whose responsibilities include duties related to the operation of the School Nutrition program) receive adequate training specific to the task they perform. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

For detailed regulation see: SP 39-2015: Question 29

Required SFA Response	SFA Response	CNR Internal Use	
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Required Corrective Actions- Review Areas

Required SFA Response	SFA Response	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 applicable to their duties in the program.			

Finding #17: Food Safety, Storage, and Buy American

The SFA does not have a food safety plan. The SFA did not have a copy of their written food safety plan available at the reviewed site(s).

Technical Assistance

During the review, the food safety plan was discussed with the SFA. The SFA must have a complete food safety plan that includes all of the required sections as specified by USDA. 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. 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.

For detailed regulation see: 210.13(c) Food safety program.

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 a complete food safety plan has been developed and is available at each site within the SFA.			
4. Provide the following Standard Operating Procedures (SOP) from the food safety plan: Receiving Deliveries, Washing Hands and Date			
5. Provide a statement that a complete food safety plan is available at each site within the SFA.			

Finding #18: Food Safety, Storage, and Buy American

The SFA does not have documentation to show that they requested the two required health inspections from the applicable agency per school year.

Technical Assistance

During the review, health inspections were discussed with the SFA. The SFA must request two health inspections for each site for each school year and must maintain documentation of this request.

For detailed regulation see: 210.13(b) Food safety inspections.

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 SFA has requested two health inspections for the current school year and will annually request two inspections be completed moving forward.			
4. Provide a copy of the inspection request.			

Finding #19: Food Safety, Storage, and Buy American

Temperature logs are not being maintained for all food storage areas.

Technical Assistance

During the 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 six (6) months.

For detailed regulation see: 210.15(b)(5) Records from the food safety program

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 SFA understands the requirements for food safety documentation, including that all			

Finding #20: Food Safety, Storage, and Buy American

Storage violations were observed on-site.

1. The SFA had food that was not stored 6 inches off the floor.
2. Storage violations were observed on-site. The SFA had food that was not dated upon delivery.

Technical Assistance

During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is stored at least six (6) inches off the floor. The SFA must ensure that all food is dated upon delivery, especially when items are removed from their original box.

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 written statement that all food is stored at least six (6) inches off of the floor.			
4. Provide a written statement that all food items are dated with the delivery date.			

Finding #21: Meal Components and Quantities

On the day of review, meals that were claimed at the point of service for reimbursement did not meet all required portion sizes per component for lunch. All required components were available. This finding may result in fiscal action due to incomplete meals claimed for reimbursement.

Technical Assistance

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 USDA FNS website can be used for training materials, resources and guidance on the meal pattern. <http://healthymeals.nal.usda.gov/>

For detailed regulation see: 210.10(c)(2) Food components

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 the SFA will ensure that all meals claimed for reimbursement contain at least the minimum number of required components in the minimum portion size for the specific grade group.			
4. Provide a step by step process that will be implemented at the point of service to ensure that all meals claimed for reimbursement contain the minimum components in the minimum portion size for the specific grade group.			

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: Required Corrective Actions- Review Areas
Sarah Thomas

Date: February 12, 2019 33

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
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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>