

**State of New Mexico
Public Education Department**

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Administrative Review Summary and Corrective Actions

SFA Name:	Des Moines Municipal Schools
SFA Code/ ID Number:	085000
Administrative Review Conducted on:	Monday, February 11, 2019
SFA Contact Name and Title:	Kodi Sumpter, Superintendent
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 11, 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

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Administrative Review Technical Assistance Summary

SFA Name:	Des Moines Municipal Schools
SFA Code/ID Number:	085000
Administrative Review Conducted on:	Monday, February 11, 2019
SFA Contact Name and title:	Kodi Sumpter, Superintendent
CNR Reviewer:	Sarah Thomas

Commendations & Suggestions

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

During the on-site review, the meals served to students were colorful and delicious.

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

Certification and Benefit Issuance - A date stamp at the time of receipt of applications is necessary to ensure that applications are processed in a timely manner.

Certification and Benefit Issuance - Explained the 30-day rollover process for households that have not submitted a new application.

Certification and Benefit Issuance - Explained the process for extending benefits to all members of the household.

Offer vs. Serve: Explained the process of offer vs. serve and the requirement for OVS at the high school level.

Production Records - A review of production records for the review period and day of review show that records are not being fully completed. Total amount prepared should have quantities associated with each item, total amount prepared should be present for each menu item and leftovers should be filled in to provide a complete picture of the meal service.

Resource Management: The SFA did not calculate compliance with paid lunch equity requirements, as the Unrounded Requirement Finder tab of the Paid Lunch Equity Tool was not completed. This tab must be completed in order for the tool to calculate a requirement price. The tool was corrected by the reviewer and sent to the SFA in an email along with additional technical assistance. For next year, the SFA must increase prices to the amount listed in the gray "Required price increase for SY 20XX-XX (with 10 cent cap)" box on the Price Calculator tab of the SY 19-20 tool. If the school board chooses to not increase prices, the SFA must apply for an exemption or transfer general funds into Fund 21000 to pay for the deficiency (as calculated on the Nonfederal Calculator tab).



Required Corrective Actions- Review Areas
New Mexico Public Education
Student Success & Wellness Bureau
Administrative Review Corrective Action Plan

SFA Name: Des Moines Municipal Schools
 SFA Code/ID: 085000

Administrative Review Conducted: Monday, February 11, 2019
 Site(s) Selected for Review: Des Moines High School

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 expiration of 30 days of carryover eligibility. Changes are made at 15 operating days, rather than the required 30 days.			
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.			

Finding #2: Certification and Benefit Issuance
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Changes are not being made to the point of service benefit issuance document in an appropriate manner to reflect transfer students.

Technical Assistance

During the review, updating the point of service was discussed with the SFA. When transfer students arrive, appropriate documentation is necessary to determine their status rather than a verbal statement from the household.

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 written plan to ensure that changes to the point of service will be made when new current school year meal benefit			

Finding #3: 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. The SFA approved an application that was inconsistent/unclear regarding household composition.

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. When determining eligibility, the SFA may not approve applications that are inconsistent or unclear in regard to household members. 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 each of the corrected applications, with the date corrected indicated, and letters to the household(s) if there is a			

Finding #4: Certification and Benefit Issuance

The SFA annualized income when it should have been determined at its stated 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.

For detailed regulation see: 245.6(c)(4) 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 statement of understanding that income will not be annualized when it should be determined at its stated frequency			

Finding #5: Verification

The applications subject to verification were not properly selected in accordance with the sample size option used, as the SFA did not select their verification applications from the error-prone applications.

Technical Assistance

During the review, selecting the verification applications from the appropriate application pool was discussed. The SFA must choose the number of applications to review in accord with the process outlined in the Eligibility Manual for School Meals, Chapter 4.

For detailed regulation see: 245.6a(c)(3) Standard sample size.

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 size for verification and how the appropriate applications will be selected.			

Finding #6: 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 resulting in an overclaim of two breakfast meals.

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			

Finding #7: Offer versus Serve

Offer vs. Serve is not being implemented properly. The SFA was not implementing Offer versus Serve for the required 9-12 grade group.

Technical Assistance

During the review, requirements for Offer versus Serve were reviewed with the SFA. Requirements include that Senior high schools must participate in Offer vs. Serve.

For detailed regulation see: 210.10 (e) Offer versus serve.

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 Offer vs Serve is now being implemented at the senior high school(s).			

Finding #8: Offer versus Serve

The cafeteria staff has not been trained on Offer versus Serve.

Technical Assistance

During the review, the training requirement for Offer versus Serve was discussed. If the SFA is going to implement Offer vs. Serve, they should annually train their staff and train new staff as needed. On going training should be provided depending on needs to staff in order to be in compliance with Offer vs. Serve procedures.

For detailed regulation see: Offer vs. Serve Guidance Manual (Page 4)

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 ensure that all staff will be trained annually on Offer versus Serve.

Finding #9: SMART Snacks

The SFA is selling items that do not meet the Smart Snacks nutrition standards for beverages sold to elementary, middle and high school students during the school day.

Technical Assistance

During the review, beverage rules under Smart Snacks were discussed with the SFA. The SFA must ensure that all beverages meet the requirements, based on the level of the school (elementary, middle, high) where they are sold.

For detailed regulation see: 210.11 (m)(1-3)

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 ensure that all items sold to students during the day meet Smart Snacks nutrition standards.			

Finding #10: 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 #11: SFSP Outreach

The SFA has not performed SFSP outreach.

Technical Assistance

It was determined during the review that the SFA has not performed SFSP outreach. The SFA must perform SFSP outreach before the end of the school year. Methods of outreach such as posting SFSP information on the SFA's website, parent newsletters and district-wide emails were discussed with the SFA. Schools may fulfill this requirement through Robo calls, flyers or other methods that notify the community of locations of summer meal sites. Methods to locate sites that serve free meals to children during the summer include the following:

- Call 211
- Call 1.866.3Hungry or 1.877.8Hambre

For detailed regulation see: 210.12(d) Outreach activities. (2)

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 will cooperate with Summer Food Service Program sponsors to conduct outreach on the			

Finding #12: Resource Management

The SFA had an excess net cash resource balance of \$15,743. This is a repeat finding from the previous Administrative Review.

Technical Assistance

The SFA may not accumulate net cash resources exceeding three months' average expenditures unless they receive prior approval from PED. The three month average expenses for the year were \$18,869 and ending net cash resources were \$34,612. The SFA received a finding for excess net cash resources in SY 14-15. The SFA has failed to implement corrective action by sufficiently spending down the excess balance. Detailed explanations on how to calculate compliance with net cash resources were provided in an email during the review. The SFA will need to submit a detailed spend-down plan explaining how they will reduce the excess balance through allowable expenses. All allowable food service costs should accrue to Fund 21000, including labor. If this causes the food service fund to operate at a deficit, an operating transfer should be made to zero out any negative balance and show that the general fund supports food service operations. The SFA should implement internal controls to better monitor compliance with net cash resource limitations.

For detailed regulation see: 7 CFR 210.14(b) Net Cash Resources

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Attach a detailed spend down plan explaining how the nonprofit school food service balance will be spent down to a level at or below 3 months average expenditures.			
2. Provide a written statement explaining the internal controls that have been put into place to better monitor compliance with net cash resource limitations.			
3. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			

Finding #13: Resource Management

Required Corrective Actions- Review Areas

The SFA misclassified non-food service staff as program adults eligible for free meals.

Technical Assistance

The SFA listed up to 12 program adult lunches per day on the high school edit checks for December 2018. This is inconsistent with the number of food service employees employed by the district. Only food service employees may eat for free at the cost of the food service program. Any other staff members, including those on "lunch duty," must pay for the full cost of their meal, as outlined in FNS Instruction 782-5. The SFA was sent a copy of the October 2015 PED memo concerning Program Adult Meals. This memo clarifies that a staff member can only qualify as a food service employee if they spend at least 50% of their work time performing food service duties.

For detailed regulation see: FNS Instruction 782-5

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide a list of district employees by job title who meet the PED definition of program adults eligible for free meals. Include an explanation for how the SFA will ensure only these eligible program adults will receive meals for free with the meals marked under the "program adult" column of the edit checks.			
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: _____
 Signature of CN Resource Reviewer: Sarah Thomas

Date: _____
 Date: February 11, 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/USDSmartSnacks.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>