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**Administrative Review Summary and Corrective Actions**

SFA Name:	Dona Ana County Juvenile Detention Center
SFA Code/ ID Number:	017038
Administrative Review Conducted on:	Wednesday, February 27, 2019
SFA Contact Name and Title:	Lieutenant Matthew Cordoba
CNR Reviewer:	Rich Crandall

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on Wednesday, February 27, 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 April 27, 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 April 27, 2019.

Thank you,



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

**CN Resource**  
**1930 N Arboleda, 101, Mesa, Arizona 85213**  
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## Administrative Review Technical Assistance Summary

SFA Name:	Dona Ana County Juvenile Detention Center
SFA Code/ID Number:	017038
Administrative Review Conducted on:	Wednesday, February 27, 2019
SFA Contact Name and title:	Lieutenant Matthew Cordoba
CNR Reviewer:	Rich Crandall

### Commendations & Suggestions

Great work meeting the whole grain-rich requirement for the week of menu review.

Excellent job meeting all breakfast meal pattern requirements for the week of menu review.

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

**Food Safety and Storage** - During the review, health inspections were discussed with the SFA. The SFA must post a copy of the most recent food safety inspection in a publicly visible location at the site.

**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.

**Professional Standards** - The SFA should be sure to include all employees who are required to meet training hours in their tracking tool.

**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) and nonprogram (nonreimbursable dinners) food costs. The SFA must ensure federal funds are only used to pay for program costs.

**Required Corrective Actions- Menu Review**

SFA Name:	Site(s) Selected for Review:			
<i>Dona Ana County Juvenile Detention Center</i>	1 <i>Dona Ana County Juv. Det Ctr.</i>	NSLP Grade Group: K-8, 9-12	SBP Grade Group: K-12	<input type="checkbox"/> N/A
SFA ID Number:	2 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
<i>017038</i>	3 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
Week of Menu Review:	<u>1/6/19 - 1/12/19</u>			

**Menu Review Findings: Lunch**

1. 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.
2. For the week of menu review, the lunch menu did not meet the minimum daily vegetable requirement. Vegetables were 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 meat/meat alternate and daily vegetable 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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**Required Corrective Actions- Review Areas**  
**New Mexico Public Education**  
**Student Success & Wellness Bureau**  
**Administrative Review Corrective Action Plan**

SFA Name: Dona Ana County Juvenile Detention Center  
 SFA Code/ID: 017038

Administrative Review Conducted: Wednesday, February 27, 2019  
 Site(s) Selected for Review: Dona Ana County Juv. Det Ctr.  
N/A  
N/A

Date Corrective Action Plan was provided to SFA: 3/28/2019

Due Date for Corrective Action Plan: 4/27/2019

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 point of service did not provide an accurate meal count. The test tray was included in the daily meal counts on the day of review. The test tray was also included in the meal counts for every day in February 2019 and for the test month - January 2019. This is a systemic error.			
Technical Assistance			
To be in compliance, the SFA must ensure that meal counts taken at the point of service correctly identify the number of meals served and not include the test tray. This number cannot exceed daily enrollment at the detention center. Counting meals accurately at the point of service was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.			
For detailed regulation see: 210.7(c)(1) Lunch count system.			
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 the new/revised process, in writing, that will be implemented at the point of service to ensure accurate meal counts.			

Finding #2: Civil Rights Training			
The SFA did not provide the yearly civil rights training for the appropriate staff.			
Technical Assistance			
During the on-site review the requirement to provide a yearly civil rights training was discussed with the SFA. The SFA must provide civil rights training at least once a year to all frontline staff and supervisor and maintain all required documentation. A link was sent to the Civil Rights training page for NMPDE and USDA/FNS.			

*For detailed regulation see: FNS Instruction 113-1 Section XI Training*

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 civil rights training to all appropriate staff.			
4. Provide a statement of assurance that civil rights training will be provided annually to all appropriate staff.			

**Finding #3: Local School Wellness Policy**

The SFA does not have a Local School Wellness Policy.

**Technical Assistance**

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> and to the NMPDE Wellness Policy page. Modifications to the Wellness Policy can be made to accommodate the unique structure of the juvenile detention facility. Contact NMPDE for additional guidance.

*For detailed regulation see: 210.31 Local school wellness policy*

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 copy of the completed Local Wellness Policy.			

**Finding #4: Summer Food Outreach**

The SFA has not performed SFSP outreach.

**Technical Assistance**

It was determined during the review that the SFA has not performed SFSP outreach. Even though the SFA is a juvenile detention center, they must make students aware of summer feeding sites upon release. Methods of outreach such as posting SFSP information on the SFA's website and creating a flyer were discussed with the SFA. Schools may fulfill this requirement through 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
- Visit the website: [www.fns.usda.gov/summerfoodrocks](http://www.fns.usda.gov/summerfoodrocks) (note, this replaces the whyhunger.org website)
- Use the site locator for smartphones - Rangeapp.org

*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 availability of the Summer Food Service Program.			

**Finding #5: Professional Standards**

The School Nutrition Program Director, Nutrition Program Managers, and Nutrition Program 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, annual training hour requirements were discussed with the SFA. To be in compliance, the SFA must ensure that the School Nutrition Program Director, Managers and Staff complete the required amount of training annually. The USDA's Guide to Professional Standards for School Nutrition Programs was e-mailed to the Director.

*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. List the names, length, and date of trainings that have been completed/planned to meet the required training hours.			

**Finding #6: Meal Counting and Claiming**

There are days when the free, reduced price, or paid meal counts exceeded the number of free, reduced price, or paid eligible students, and there is not an acceptable explanation. The SFA claimed the test tray each meal.

**Technical Assistance**

During the review, edit checks were discussed with the SFA. There are days when the free, reduced price, or paid meal counts exceeded the number of free, reduced price, or paid eligible students, and there is not an acceptable explanation. To be in compliance, the SFA must ensure that edit checks are completed accurately.

Maintaining an accurate edit check was 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 statement that daily edit checks will be reviewed to determine if meal counts exceed the number of eligible students.			
4. Provide a statement that an explanation will be documented for each day that the meal counts exceed the number of eligible students.			

**Finding #7: Meal Counting and Claiming**

The SFA does not conduct a daily edit check for each meal service.

**Technical Assistance**

During the review, edit checks were discussed with the SFA. The SFA does not conduct a daily edit check for each meal service. To be in compliance, the SFA must ensure that edit checks are completed daily. How to complete edit checks to ensure meal counts do not exceed attendance adjusted eligible and/or total enrollment was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.

*For detailed regulation see: 210.8(a)(3) Edit checks.*

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 complete a daily edit check and will maintain edit check records for a minimum of 3 years plus the current school year.			
4. Provide one month of completed edit checks for the site(s) selected for review as supporting documentation for this finding.			

**Finding #8: 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 received a total of \$33,039 from USDA reimbursements. These revenues were used to pay for all of the program meal costs and the remaining funds



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 and lunches 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: \_\_\_\_\_  
 Signature of CN Resource Reviewer: Rich Crandall

Date: \_\_\_\_\_  
 Date: February 27, 2019

If you have any questions, feel free to contact CN Resource at your convenience. Thank you.



*Administrative Review Team*  
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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>