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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:	Eunice Public Schools
SFA Code/ ID Number:	032000
Administrative Review Conducted on:	Wednesday, February 27, 2019
SFA Contact Name and Title:	Cynthia Sims, Business Manager
CNR Reviewer:	Casey O'Neill, CNR

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on 2/27/2019; 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 **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

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

SFA Name:	Eunice Public Schools
SFA Code/ID Number:	032000
Administrative Review Conducted on:	Wednesday, February 27, 2019
SFA Contact Name and title:	Cynthia Sims, Business Manager
CNR Reviewer:	Casey O'Neill, CNR

Commendations & Suggestions

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

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

The SFA was organized well and prepared for the review.

The SFA was open to all technical assistance and willing to implement it immediately.

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

Civil Rights - During the review the requirement for the SFA to have a complaint procedure was discussed. The SFA follows the instructions outlined in the USDA non-discrimination statement. The SFA should also keep a copy of the PED NSLP Complaint Form on file to utilize as well. The form can be found on the PED website at:

<https://webnew.ped.state.nm.us/wp-content/uploads/2018/08/NSLP-Complaint-Form-2018.pdf>

Food Safety - 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. The SFA moved the health inspection to a publicly visible location during the review. No further action required.

SFA Name:	Site(s) Selected for Review:		
<i>Eunice Public Schools</i>	1 <i>Mettie Jordan Elementary</i>	NSLP Grade Group: K-5	SBP Grade Group: K-5 <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>032000</i>	3 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group: <input type="checkbox"/> N/A
Week of Menu Review:	1/14/19 - 1/18/19		

Menu Review Findings: Lunch

For the week of menu review, the lunch menu did not meet the minimum weekly requirement for grain. A grain was offered daily, however the weekly minimum requirement 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 weekly grain 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: Eunice Public Schools
 SFA Code/ID: 032000

Administrative Review Conducted: Wednesday, February 27, 2019
 Site(s) Selected for Review: Mettie Jordan Elementary
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: Certification and Benefit Issuance			
The Direct Certification letter used by the SFA does not include the correct USDA non-discrimination statement.			
Technical Assistance			
During the review, the requirements of the Direct Certification letter were discussed with the SFA. The SFA must include the information in the letter as outlined in the Eligibility Manual for School Meals, Chapter 2.			
For detailed regulation see: 245.6(c)(6)(ii) 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 copy of the revised Direct Certification letter that includes the correct non-discrimination statement.			

Finding #2: Certification and Benefit Issuance			
The SFA had multiple application errors. 6 applications with Pre-K students who were approved for free meal benefits, and the application was determined at a different benefit status. There were 6 applications that the SFA miscalculated the income on the application. 1 application was denied correctly, but the students were on the benefit issuance list as free. 5 applications were approved without an adult signature. 1 of the applications was also missing a SSN and an indication of the total members of the household. 1 application was approved as free and did not have an SSN.			
Technical Assistance			
Complete applications must include the appropriate documentation. 245.2 Documentation means: (1) The completion of a free and reduced price school meal or			

free milk application which includes: (i) For households applying on the basis of income and household size, names of all household members; income received by each household member, identified by source of the income (such as earnings, wages, welfare, pensions, support payments, unemployment compensation, and social security and other cash income); the signature of an adult household member; and the last four digits of the social security number of the adult household member who signs the application or an indication that the adult does not possess a social security number. 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 change in eligibility status.			

Finding #3: Certification and Benefit Issuance

The SFA did not use the correct conversion factors for applications with more than one income frequency.

Technical Assistance

During the review, the conversion factors were discussed with the SFA. 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.
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 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 direct certifications were correctly certified. The direction certification list did not include the names of all students who were marked as categorically free based on direct certification. 2 students were listed on the benefit issuance document as directly certified and the SFA had a denied application on file for those students.

Technical Assistance

During the review, direct certification was discussed with the SFA. The SFA may not determine students as categorically free based on direct certification if their names are not included on the appropriate direct certification list/documentation.

For detailed regulation see: SP 25-2010: Q&A 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 direct certification list will include the full name of all students who were marked as categorically free based on direct certification.			

Finding #5: Certification and Benefit Issuance

The SFA did not accurately transfer the correct benefit from the eligibility determination document to the Point of Service benefit issuance document. The SFA had all Pre-K students listed on the BID as free, even if the application they were on was determined at a different benefit status. The SFA had 5 students approved for free benefits with no source documentation on file for where the benefit came from.

Technical Assistance

During the review, accurately updating the point of service was discussed with the SFA. The SFA must transfer the correct benefit from the eligibility determination document to the Point of Service benefit issuance document. Updates to the point of service document must be made in a timely fashion. The SFA must ensure they have source documentation on file to support the benefits provided to students listed on the benefit issuance document.

For detailed regulation see: 210.8(a) Claims for Reimbursement

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 plan for how the point of service will always have the correct benefit information.			
4. Provide a statement of understanding that the SFA will only have students with an approved benefit and source documentation on file list on its benefit issuance document.			

Finding #6: Verification			
The verified applications on file do not match the number reported on the most recent FNS-742.			
Technical Assistance			
During the review, details of the fields in the FNS 742 were discussed with the SFA. The SFA was informed that they must complete the FNS 742 according to the verification requirements and to the instructions for this form. The FNS 742 must accurately represent how many applications the SFA has on file.			
<i>For detailed regulation see: 245.6a(h) Verification reporting and recordkeeping requirements.</i>			
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 staff conducting verification understand how to correctly fill out the FNS 742.			
4. Provide a copy of the revised FNS 742.			

Finding #7: Verification			
The SFA does not have documentation demonstrating that a confirmation review took place.			
Technical Assistance			
During the review, documenting the confirmation review was discussed with the SFA. The SFA must conduct confirmation reviews and maintain documentation that these took place.			
<i>For detailed regulation see: 245.6a(e) Activities prior to household notification</i>			
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 complete a confirmation review on all applications that are selected for verification.			

Finding #8: Verification			
The SFA did not complete verification by November 15.			
Technical Assistance			
During the review, completing verification on time was discussed with the SFA. The SFA must complete verification by November 15.			
<i>For detailed regulation see: 245.6a(b) Deadline and extensions</i>			

Required Corrective Actions- Review Areas

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 perform verification that include specific dates for completion.			

Finding #9: Meal Counting and Claiming

The point of service did not provide an accurate meal count by eligibility status for the K-2 students. The students have their reimbursable meal verified at the POS, but are not counted until they sit down by a teacher walking around with a roster list. This is a systematic error.

Technical Assistance

To be in compliance, the SFA must ensure that meal counts taken daily at the point of service correctly identify the number of free, reduced priced and paid lunches served. Tracking students 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 by category.			

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. The SFA overclaimed 3 meals at breakfast and 3 meals at lunch during the review month.

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 #11: Offer Versus Serve

Offer versus Serve is not being implemented correctly. Teachers were requiring students to take a milk even if they did not want one or need one for a reimbursable meal.

Technical Assistance

During the review, the meal pattern requirements for Offer versus Serve were reviewed with the SFA. Requirements include that the SFA must offer the five food components specified in the meal pattern, and students must be allowed the option to deny two items, except that they must take at least a 1/2 cup of either the fruit or vegetable component or 1/2 cup combination of fruit and vegetable.

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 statement of assurance that Offer vs Serve has been reviewed and that students will not be forced to take an item when they already have a reimbursable meal.			

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: Casey O'Neill

Date: _____
 Date: February 27, 2019

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



Administrative Review Team

CN Resource

P.O. Box 31060

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>