

**State of New Mexico
Public Education Department**

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Howie C. Morales
Lieutenant Governor

Michelle Lujan Grisham
Governor

Administrative Review Summary and Corrective Actions

| | |
|-------------------------------------|----------------------------------|
| SFA Name: | Gallup Catholic School |
| SFA Code/ ID Number: | 043087 |
| Administrative Review Conducted on: | Wednesday, February 13, 2019 |
| SFA Contact Name and Title: | Vanessa Shirley, Kitchen Manager |
| CNR Reviewer: | Jenna Lin, RDN |

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on 2/13/19; an exit conference summarizing the findings took place on the same day.

The Administrative Review (AR) is a comprehensive evaluation of the Local Education Agency's (LEA's) National School Lunch Program (NSLP) and School Breakfast Program (SBP). The AR consists of two performance standards. While findings were identified, the two performance standards reviewed were found to be satisfactory. During the Administrative Review, compliance with the new meal pattern requirements is also evaluated, at this time there are no menu findings that warrant the termination of the performance based reimbursement.

This summary includes a comprehensive list of the technical assistance that was provided throughout the review as well as all findings that require a written response from the SFA. All items listed on the red Corrective Action tabs (Menu and Review) require a written response and must be submitted in writing to CN Resource by 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
p 866 941.6368 f 480 325.9967

Administrative Review Technical Assistance Summary

| | |
|-------------------------------------|----------------------------------|
| SFA Name: | Gallup Catholic School |
| SFA Code/ID Number: | 043087 |
| Administrative Review Conducted on: | Wednesday, February 13, 2019 |
| SFA Contact Name and title: | Vanessa Shirley, Kitchen Manager |
| CNR Reviewer: | Jenna Lin, RDN |

Commendations & Suggestions

Staff was friendly and accommodating to reviewer onsite.

Kitchen was clean.

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

Menu Review- a Child Nutrition (CN) Label or Product Formulation Statement was not available for the Turkey served on the Turkey Stromboli on Friday. Therefore, meal pattern crediting could not be determined at met. Choose a product with either a CN Label or Product Formulation Statement in order to determine meal pattern crediting.

Verification - technical assistance provided regarding the determining, confirming and verifying officials. The determining official may not also be the confirming official.

Civil Rights - technical assistance was provided regarding requirement to provide resources for LEP families including finding forms in appropriate language on the USDA website.

Resource Management - The SFA did not submit the Resource Management Offsite Assessment Tool until the on-site review, which was over 5 weeks past the initial deadline. The SFA also failed to respond to follow-up questions and documentation requests. Several documents were submitted for the incorrect timeframe requested. The food service director needs to work closely with the business department to respond to requests from the reviewers in a timely manner. Failure to respond resulted in a comprehensive review in three of the resource management sections and multiple findings.

Required Corrective Actions- Menu Review

SFA Name:
Gallup Catholic School
 SFA ID Number:
 043087
 Week of Menu Review:
 1/7/19 - 1/11/19

| Site(s) Selected for Review: | | | |
|------------------------------|-------------------------------|-----------------------|---|
| 1 | <i>Gallup Catholic School</i> | NSLP Grade Group: K-8 | SBP Grade Group: K-8 <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 fruit requirement. Fruit 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.
3. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the dark green vegetable subgroup.
4. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the red/orange vegetable subgroup.
5. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the beans/legumes vegetable subgroup.
6. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for meat/meat alternate. A meat/meat alternate was offered daily, however the weekly minimum requirement was not met.
7. For the week of menu review, the lunch menu did not meet the whole grain-rich requirement
8. The vegetable component was missing for the lunch meal served on 1/10/19
9. For the day of review, the lunch menu did not meet the minimum daily requirements for the fruit and vegetable components. This was a finding during week of menu review as well.

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 fruit, daily vegetable, dark green, red orange and beans/legumes vegetable subgroups, weekly meat/meat alternate, and whole grain-rich 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. | | | |

Not all selected applications v



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

SFA Name: Gallup Catholic School
 SFA Code/ID: 043087

Administrative Review Conducted: Wednesday, February 13, 2019
 Site(s) Selected for Review: Gallup Catholic School
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: Certification and Benefit Issuance | | | |
|---|--------------|------------------|--------|
| At the beginning of the year, the SFA does not properly handle the status of children who have not submitted an application for the current school year. The SFA has been giving meal benefits to these students when there is no documentation to support a "free" or "reduced price" status. These students were not on carry-over status. | | | |
| Technical Assistance | | | |
| During the review, properly handling the status of children for whom an application has not been submitted was discussed with the SFA. If a child has not submitted and application or is not on the Direct Certification list the student will either receive carryover status from the previous year if applicable or will be considered "paid" until an application is received and approved based on the information provided on the application. 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 only applies for the first 30 operating days of the school year or until a new application is approved, whichever comes first. The SFA may not backdate eligibility statuses for students who submit an application after the beginning of the school year. | | | |
| <i>For detailed regulation see: 245.6(c) Application, eligibility and certification</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 not provide benefits to the students before a complete application has been received. | | | |



Finding #2: 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. Applications with case numbers that was not consistent with the format used in the state. Three applications were approved prior to July 1st of the current school year.

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. For more information, see the Eligibility Manual for School Meals, Chapter 3. When determining eligibility, the SFA may not approve applications that are inconsistent or unclear. For more information, see the Eligibility Manual for School Meals, Chapter 3. When determining eligibility, the SFA may approve an Assistance Program application only if it contains a valid case number, consistent with the format used in that state. For more information, see 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 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 does not have a benefit issuance list that identifies how the eligibility was determined, dates or dates when changes were made i.e. end of 30 day carryover period.

Technical Assistance

During the review, the benefit issuance document was discussed with the SFA. The SFA was informed that the list should identify how the eligibility for each student was determined. This can be through direct certification, application, etc. In addition, documentation must indicate the date changes are made.

For detailed regulation see: 245.6(ii)(b)(7) Application, eligibility and certification; 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 copy of the benefit issuance list that identifies how the eligibility was determined and date determined. | | | |

Finding #4: Certification and Benefit Issuance

The SFA does not perform direct certification as required.

Technical Assistance

During the review, direct certification documentation was discussed with the SFA. To be in compliance with the requirements for direct certification documentation, the SFA must ensure that the list comes from the proper agency. SFA staff, unless they are specifically designated as the homeless liaison, may not decide that a child is homeless and thereby is eligible for free meal benefits. The SFA must perform at least 3 Direct Certification matches according to the timeframes established by the State Agency. The SFA may elect to complete additional direct certification matches however at a minimum they must complete 3 match within the set timeframe. None of the Direct Certification lists have been retained on file by the SFA. The SFA must maintain Direct Certification lists on file or 3 years after the date of the fiscal year to which they pertain, except that if audit findings have not been resolved, the documentation must be maintained as long as required for resolution of the issues raised by the audit.

For detailed regulation see: 245.6(b)(3) 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 eligibility determinations may only be made based off of documentation from the appropriate agency. Students found to be incorrectly determined during the review must have their status corrected. Show that the status has been corrected. | | | |
| 4. Provide a statement of understanding that the SFA will perform Direct Certification matches according to the required timeframes moving forward. | | | |
| 5. Provide a statement of understanding that all Direct Certification lists will be maintained on file. | | | |

Finding #5: 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

Required Corrective Actions- Review Areas

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 (monthly, weekly, bi weekly, or 2 x per mo.) | | | |

Finding #6: Certification and Benefits Issuance

The SFA did not accurately transfer the correct benefit from the eligibility determination document to the Point of Service benefit issuance document. One student was approved for free benefits based on the application, but the point of service document showed reduced-price benefits.

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.

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. | | | |

Finding #7: Meal Counting and Claiming (Edit Checks)

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: 245.6(e) 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 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: Verification

The SFA did not complete verification. The SFA does not have a verification notification letter. The SFA did not complete verification by November 15.

Technical Assistance

During the review, completing verification was reviewed with the SFA. The SFA was informed that they must complete verification according to regulations and within the correct timeframe. The SFA should review the current Income Eligibility Manual for additional verification information. During the review, the content of the verification notification letter was discussed with the SFA. In its notification letter, the SFA must include the information outlined in the Eligibility Manual for School Meals, Chapter 4. During the review, completing verification on time was discussed with the SFA. The SFA must complete verification by November 15.

For detailed regulation see: CFR 245.6a(C)(1) General; 245.6a(f) Verification procedures; 245.6a(b) Deadline and extensions

| 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 in order to complete verification. | | | |
| 4. Provide a statement of understanding that the SFA's verification notification letter must include the information outlined in the Eligibility Manual for School Meals, Chapter 4. | | | |
| 5. Provide a copy of the revised verification notification letter. | | | |
| 6. List the steps the SFA will take to perform verification that include specific dates for completion. | | | |

Finding #9: Meal Counting and Claiming

The SFA is claiming incomplete meals for reimbursement. Ten (10) meals on the day of review did not include a milk.

Technical Assistance

During the review, claiming reimbursable meals was discussed with the SFA. The SFA is claiming incomplete meals for reimbursement. To be in compliance, the SFA must ensure that the only meals claimed for reimbursement are those that contain the minimum number of required components in at least the minimum portions as required by grade group. The meal pattern was reviewed with the SFA.

For detailed regulation see: 210.9(b) Agreement

| 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 includes a statement that the SFA is no longer claiming incomplete/non-reimbursable meals for reimbursement, and a description of the new process that has been implemented to ensure compliance. | | | |

Finding #10: Civil Rights

The SFA must use the current civil rights statement on all Program materials. The SFA is not using the civil rights statement on the menus sent home to families.

Technical Assistance

During the review the requirement for the most current civil rights statement to appear on all Program material was discussed with the SFA. The SFA must use the most current statement on all Program material. Per USDA requirements the new Non-discrimination statement must be on all program materials no later than September 30, 2016. The SFA was provided with the USDA link to the new non-discrimination statement. <http://www.fns.usda.gov/fns-nondiscrimination-statement>

For detailed regulation see: FNS Instruction 113-1 IX A 3 Nondiscrimination Statement.

| 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 non-discrimination statement has been added to all nutrition program materials. | | | |
| 4. Include a copy of the March menu that includes the non-discrimination statement. | | | |

Finding #11: Civil Rights

The SFA is not maintaining a medical statement on file for students with life-threatening allergies.

Technical Assistance

During the review the requirement of maintaining a medical statement on file for students with life-threatening allergies was discussed with the SFA. The SFA must maintain a medical statement on file.

For detailed regulation see: 210.10(m)(1) Exceptions for Disability Reasons

| 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 assurance that medical statements will be kept on file for each child. | | | |

Finding #12: Civil Rights

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.

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. | | | |
| 5. Provide a copy of the sign in sheet for the training. | | | |

Finding #13: Civil Rights

The "And Justice for All" poster is not visible by the students.

Technical Assistance

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.

For detailed regulation see: FNS Instruction 113-1 Section B

| 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 the posters must be visible to all customers. | | | |

Finding #14: Civil Rights

The SFA is attempting to resolve complaints alleging discrimination within the FNS School Meal Programs.

Technical Assistance

During the review the process for receiving and processing complaints alleging discrimination was discussed with the SFA. The SFA should not attempt to resolve complaints in-house and should forward all complaints to the appropriate outside agency.

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 statement of assurance that all alleged civil rights complaints regarding the meal programs will not be handled | | | |

Finding #15: Meal Components and Quantities

Signage is not posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal for 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: 210.10(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 #16: Local Wellness Policy and School Meal Environment

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>. During the review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to be made available to the public. The easiest method would be to post the wellness policy on the SFAs website. They can also send it out in a newsletter. The Local Wellness Policy is required to be reviewed and updated on a periodic basis to ensure that the policy reflects current requirements and SFA practices.

For detailed regulation see: 210.31 Local school wellness policy;210.31(e) Local School Wellness Policy; 210.31(d) 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. | | | |
| 4. Provide the link or a copy of where/how the wellness policy was published for the public. | | | |

Finding #17: Professional Standards

The school nutrition manager and full-time 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 #18: 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 #19: 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 | |
|--|--------------|------------------|--------|
| | | 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 #20: Food Safety, Food Storage, and Buy American

The SFA does not have a food safety plan.

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.

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. | | | |

Finding #21: Food Safety, Food Storage, and Buy American

The SFA did not have the most recent food safety inspection report posted in a publicly visible location.

Technical Assistance

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.

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 most recent food safety inspection is posted in a visible location. | | | |

Finding #22: Food Safety, Food Storage, and Buy American

The SFA did not request two health inspections for each 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 | | | |
| 4. Provide a copy of the inspection request. | | | |

Finding #23: Food Safety, Food Storage, and Buy American

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

Technical Assistance

During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated upon delivery. 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 once opened.

For detailed regulation see: 210.13(d) (d) Storage.

| 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 items are dated with the delivery date. | | | |
| 4. Provide a written statement that all food is stored at least six (6) inches off of the floor. | | | |
| 5. Provide a written statement that all food items are dated with the date the product was opened. | | | |

Finding #24: Food Safety, Food Storage, and Buy American

The SFA is not in compliance with the Buy American provision. Noncompliant food items were observed and no documentation was available justifying the limited exception(s).

Technical Assistance

During the review, Buy American requirements were discussed with the SFA. The SFA must purchase, to the maximum extent practicable, domestic commodities or products. “Domestic commodity or product” is defined as an agricultural commodity that is produced in the U.S. and a food product that is processed in the U.S. substantially using agricultural commodities produced in the U.S. There are limited exceptions to the Buy American provision which allow for the purchase of foods not meeting the “domestic” standard in circumstances when use of domestic foods is truly not practicable. The SFA must keep documentation justifying the limited exception(s). These exceptions, as determined by the SFA, are:

- The product is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality; or
- Competitive bids reveal the costs of a U.S. product are significantly higher than the non-domestic product.

For detailed regulation see: 210.21(d) Buy American

| 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 Buy American provision. As part of the statement, the SFA must state that documentation justifying the limited exception(s) is now maintained on file for the noncompliant food items identified during the review. | | | |
| 4. Provide documentation justifying the limited exception(s) for the noncompliant food items that were identified during the review. | | | |

Finding #25: Resource Management

The food service account was not repaid for uncollectible meal accounts written off as bad debt.

Technical Assistance

The SFA has a policy of sending unpaid meal balances to a collection agency, and does not have a process to repay the food service account with nonfederal funds. The revenue earned from the sale of unpaid meals should accrue to the food service account. Bad debt is an unallowable cost to the food service program, and any meal accounts determined to be uncollectible should be repaid to the food service account with general school funds. This should be an actual transfer of funds and/or recognition of revenue, not just an absorption of the food service deficit by the school. The food service budget cannot absorb the cost of unpaid meals. Food service should recognize the revenue earned by the sale of all meals, including those meal balances left unpaid. If the SFA operates on a cash basis of accounting, they must have a system in place to ensure the food service account receives payment from the school budget for any meal accounts sent to a collections agency.

For detailed regulation see: 2 CFR 225 Appendix B

| Required SFA Response | SFA Response | CNR Internal Use | |
|--|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Submit a report showing all unpaid meal balances sent to a collection agency in SY 17-18. | | | |

| | | | |
|--|--|--|--|
| 2. Provide a written statement explaining how the SFA will ensure the uncollectible meal accounts will be repaid to food service with non-federal funds. | | | |
| 3. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance. | | | |

Finding #26: Resource Management

The SFA did not use the USDA Paid Lunch Equity Tool or comparable mechanism to evaluate its need to raise its paid lunch prices.

Technical Assistance

The SFA submitted a blank Paid Lunch Equity Tool to PED for SY 18-19. The SFA should complete the tool annually, evaluate the need to raise paid lunch prices and/or use nonfederal funds, and retain documentation of compliance for at least three years.

For detailed regulation see: 7 CFR 210.14 (e) Pricing Paid Lunches

| Required SFA Response | SFA Response | CNR Internal Use | |
|---|--------------|------------------|--------|
| | | Appv. | Intls. |
| 1. Provide assurance that you have received a copy of the SY 18-19 PLE Tool completed by the reviewer, read through the technical assistance given by the reviewer, and are aware of how to correctly complete & evaluate the tool for next year. | | | |
| 2. Submit the PLE Tool to PED via the PED Nutrition Application web system. | | | |
| 3. Explain how internal controls have been put into place to ensure the tool will be completed correctly every year. | | | |
| 4. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance with paid lunch equity requirements. | | | |

Finding #27: Resource Management

The SFA asserted that nonprogram adult meals were served for free, and they did not provide documentation showing these meals were repaid to the food service account.

Technical Assistance

The SFA stated on the Offsite Assessment Form that teachers eat for free, as approved by the principal. The SFA did not respond to requests for clarification on this policy. Only food service employees may eat for free at the cost of the food service program. Any other staff members, visiting adults, or "lunch duty" staff 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 cafeteria supervisors cannot eat for free, as they do not meet the definition of a program adult. If adults will not be charged directly, the food

Required Corrective Actions- Review Areas

service program must be reimbursed for the full cost of these meals. The SFA should bill the department or organization that will pay for the free meals and ensure the non-federal funds are received by the food service program. These meals should accrue as nonprogram revenue to the food service account.

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 receive free meals. Include any additional comments necessary to clarify the statement that teachers eat for free, as approved by the principal. | | | |
| 2. If any of the employees receiving free meals do not meet the PED definition of a program adult, provide a signed statement on school letterhead explaining the procedures for ensuring the food service account is repaid for the nonprogram adult meals. This should include the source of the nonfederal funds, the frequency at which the food service program is reimbursed (weekly, monthly, etc.), and the rate the food service program charges for these meals. | | | |

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: Jenna Jin

Date: February 13, 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>