

**State of New Mexico
Public Education Department**

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<https://webnew.ped.state.nm.us/bureaus/student-success-wellness/>

Howie C. Morales
Lieutenant Governor

Michelle Lujan Grisham
Governor

Administrative Review Summary and Corrective Actions

SFA Name:	Lindrith Area Heritage School
SFA Code/ ID Number:	056003
Administrative Review Conducted on:	Wednesday, February 6, 2019
SFA Contact Name and Title:	Rebecca Gibson/Administrator, Patrick Kelly/FSD
CNR Reviewer:	Danielle Reidy

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on February 6, 2019; an exit conference summarizing the findings took place on the same day.

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

This summary includes a comprehensive list of the technical assistance that was provided throughout the review as well as all findings that require a written response from the SFA. All items listed on the red Corrective Action tabs (Menu and Review) require a written response and must be submitted in writing to CN Resource by **Wednesday, April 10, 2019**. Please complete the responses electronically. If any additional responses are needed, please respond on district letterhead. In addition to responding to the findings please ensure that additional training is provided to all staff to bring all finding areas into compliance. Failure to submit the required materials by the due date may result in the withholding of claims. Should corrective actions not be submitted, a follow-up review may take place to ensure all required corrective actions were completed and implemented system-wide as appropriate.

Any potential fiscal action will be calculated once the corrective action responses have been received and approved.

I appreciate the courtesies extended by you and your personnel during the review. If you have questions or need assistance concerning the school food service program, please call our office. Please respond to the Administrative Review Corrective Actions by **Wednesday, April 10, 2019**.

Thank you,



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

CN Resource
1930 N Arboleda, 101, Mesa, Arizona 85213
p 866 941.6368 f 480 325.9967

Administrative Review Technical Assistance Summary

SFA Name:	Lindrith Area Heritage School
SFA Code/ID Number:	056003
Administrative Review Conducted on:	Wednesday, February 6, 2019
SFA Contact Name and title:	Rebecca Gibson/Administrator, Patrick Kelly/FSD
CNR Reviewer:	Danielle Reidy

Commendations & Suggestions

The SFA was open to all feedback and willing to implement any needed changes.

Staff has a great rapport with students.

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

Menu review- - the tortilla label provided was a Sysco vendor label that did not indicate the weight of each tortilla. CN Resource was able to confirm through Sysco that each tortilla credits at 1.75 oz. eq. of grain. Sponsors should obtain complete nutrition fact labels and maintain for records.

Menu review- a Child Nutrition (CN) Label or Product Formulation Statement (PFS) was not available for the Fajita Chicken product. Therefore, meal pattern requirements could not be determined as met on 1 day. Choose a product that has either a Child Nutrition (CN) Label or Product Formulation Statement (PFS) in order to determine meal pattern crediting.

Menu review- production records did not provide adequate information as recorded. It is a requirement of the federal regulations to maintain production records. Only 1 type of milk is listed as being offered, however in response it was determined that another variety was offered daily. Include all menu items offered with planned and served numbers on daily production records.

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.

Local School Wellness Policy - During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to allow certain parties - parents, students, representatives of the school food authority, teachers of physical education, school health professions, the school board, school administrators, and the general public - to participate in the development, implementation, periodic review, and update of the Local Wellness Policy.

Local School Wellness Policy - During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to allow certain parties - parents, students, representatives of the school food authority, teachers of physical education, school health professions, the school board, school administrators, and the general public - to participate in the development, implementation, periodic review, and update of the Local Wellness Policy. The SFA must reach out to these parties to make them aware of their ability to participate.

Local School Wellness Policy - During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to perform an assessment of the Local Wellness Policy at a minimum once every three years. The results of the assessment need to be made available to the public. The SFA should use the results of the assessment to determine any changes or updates that need to be made to the wellness policy.

Civil Rights - During the review, civil rights requirements were discussed. The SFA must display the most current version of the "And Justice for All" poster. Outdated posters should be removed.

Resource Management - Adults were not charged for meals in SY 17-18. The SFA started to collect adult meal sales in SY 18-19, before the review. The SFA should create written procedures for tracking, billing, and collecting payment for adult meals, to ensure a lapse in adult meal payments does not occur again. It is important to have written procedures in place, in case of employee turnover.

Summer Food Service Program Outreach- Technical assistance provided that although the sponsor does not offer the summer feeding program, they should let families know how to find summer feeding sites.

Required Corrective Actions- Menu Review

SFA Name:
Lindrith Area Heritage School
 SFA ID Number:
 056003
 Week of Menu Review:
 12/3/18 - 12/6/18

Site(s) Selected for Review:

1 <i>Lindrith Area Heritage School</i>	NSLP Grade Group: K-8	SBP Grade Group: K-8	<input type="checkbox"/> N/A
2 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
3 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A

Menu Review Findings: Lunch

1. For the week of menu review, the lunch menu did not meet the minimum daily and weekly requirements for meat/meat alternate. A meat/meat alternate was offered daily, however the minimum daily and weekly requirements were not met.
2. For the week of menu review, the lunch menu did not meet the minimum daily 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 daily fruit requirement. Fruit was offered daily, however the minimum required portion size was not met.
4. For the week of menu review, the lunch menu did not meet the requirement of no more than 50% of the fruit offerings may be in the form of juice.
5. For the week of menu review meals counted for reimbursement did not contain all of the required components. The lunch meal offered on 3 days did not contain a fruit. This finding may result in fiscal action due to incomplete meals being counted for reimbursement.
6. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the dark green vegetable subgroup.
7. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the beans/legumes vegetable subgroup.

Technical Assistance

During the Administrative Review the results of the menu review were provided in a detailed Menu Review Results Report. Recommendations were included to bring all areas into compliance. All menus served within the SFA for the National School Lunch Program must meet all daily and weekly meal pattern requirements for the specific grade group. The SFA was encouraged to provide training as needed to ensure compliance. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews, may result in fiscal action.

For detailed regulations see: 7 CFR 210.10

Required Criteria for Response to Findings	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide a written statement that the daily & weekly meat/meat alternate, daily vegetable, daily fruit (juice), and dark green and beans/legumes vegetable subgroup requirements are now met. Include details to describe what specific changes were made to the menu to correct all menu review findings and bring the menu into compliance.			

<p>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.</p>			
<p>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.</p>			
<p>4. Provide a written statement that the serving line will be visually reviewed prior to service to confirm that all required components are available.</p>			
<p>5. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.</p>			

Menu Review Findings: Breakfast

1. For the week of menu review, the breakfast menu did not meet the minimum daily fruit requirement. Fruit was offered daily, however the minimum required portion

2. For the week of menu review and on the day of review, the breakfast menu did not meet the 50% Whole Grain Rich requirement. More than half the grains provided were not whole grain rich.

Technical Assistance

During the Administrative Review the results of the menu review were provided in a detailed Menu Review Results Report. Recommendations were included to bring all areas into compliance. All menus served within the SFA for the School Breakfast Program must meet all daily and weekly meal pattern requirements for the specific grade group. The SFA was encouraged to provide training as needed to ensure compliance. Please note that per USDA guidance any repeat menu findings in future Administrative Reviews, may result in fiscal action.

For detailed regulations see: 7 CFR 220.10

Required Criteria for Response to Findings	SFA Response	CNR Internal	
		Appv	Intls.
<p>1. Provide a written statement that the daily fruit 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.</p>			

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: Lindrith Area Heritage School
 SFA Code/ID: 056003

Administrative Review Conducted: Wednesday, February 6, 2019
 Site(s) Selected for Review: Lindrith Area Heritage School
N/A
N/A

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

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

The following pages address the findings that were identified during the Administrative Review. There is an area for a response for each finding.

Please enter the detailed response for each in the spaces provided .

Finding #1: 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.			
<i>For detailed regulation see: 210.8(a)(3) Edit checks.</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 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 #2: Meal Components and Quantities	
Signage is not posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal for breakfast.	
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: 220.8(a)(2) Unit pricing. & 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 #3: Civil Rights

The SFA is using the incorrect civil rights statement. They are using an outdated version of the statement.

Technical Assistance

During the review the requirement for the civil rights statement to appear on all Program material was discussed with the SFA. The SFA must use the statement on all Program material.

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.			

Finding #4: Civil Rights

The SFA did not submit a public release.

Technical Assistance

During the review the requirement for a public release to be submitted for publishing was discussed with the SFA. At or near the beginning of each year, the SFA must submit a public release to the local media, the unemployment office and any major employers who are contemplating large layoffs in the attendance area of the school.

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

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			

3. Provide a statement of assurance that a public release will be submitted for publishing at or near the beginning of each school year.

Finding #5: Civil Rights

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

Technical Assistance

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

For detailed regulation see: FNS Instruction 113-1 Section XV Complaint Procedures

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a written procedure for how the SFA will handle any alleged civil rights complaints.			

Finding #6: Civil Rights

The SFA does not require medical statements for students with special dietary needs.

Technical Assistance

During the review, medical statements were discussed with the SFA. Medical statements, including the appropriate information and signature, must be kept on file before the school may make a substitution.

For detailed regulation see: 7 CFR Part 15b.3(i), Accommodating Children With Special Dietary Needs

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 written assurance that medical statements will be kept on file for all students with special dietary needs.			

Finding #7: 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 #8: Local School Wellness Policy

The SFAs Local Wellness Policy does not contain all of the required components. The Wellness Policy does not include goals for other school-based activities to promote student wellness.

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>

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 #9: Professional Standards

The new school Nutrition Program Director did not complete at least 8 hours of food safety training within 30 days of being hired, and did not have documentation that 8 hours of training had been completed within 5 years prior to the start date.

Technical Assistance

During the review, hiring requirements with regards to food safety training were discussed with the SFA. To be in compliance, the SFA must ensure that any new

director meets the new Professional Standards, including completing the required number of food safety training hours. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

For detailed regulation see: 210.30(b)(1)(v) School nutrition program directors

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. List the names, length, and date of trainings that have been completed/planned to meet the required food safety training hours.			

Finding #10: Professional Standards

The School Nutrition Program Director did not meet the training requirements, and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements.

Technical Assistance

During the review, annual training hour requirements were discussed with the SFA. To be in compliance, the SFA must ensure that the School Nutrition Program Director completes the required amount of training annually. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

For detailed regulation see: 210.30(b)(3) Continuing education/training standards for program directors.

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. List the names, length, and date of trainings that have been completed/planned to meet the required training hours.			

Finding #11: 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 #12: Food Safety

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.			
4. Provide the following Standard Operating Procedures (SOP) from the food safety plan: Receiving Deliveries, Washing Hands, and Date Marking Ready-to-Eat, Potentially Hazardous Foods.			

Finding #13: Water

Free potable water is not available to students for lunch and for breakfast.

Technical Assistance

During the review, the requirements for potable water were discussed with the SFA. It was determined that free potable water is not available to students for lunch and breakfast. To be in compliance, the school must ensure that free potable water is made available to students during the meal service wherever meals are served, without restriction.

For detailed regulation see: 210.10(a)(1)(i) Requirements for lunch and 220.8(a)(1) General nutrition requirements.

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 process that will be implemented to ensure that all student have access to water during the meal period.			
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Finding #14: Food Safety

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 #15: Food Safety

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

Technical Assistance

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

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

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a written statement that the SFA will annually request two inspections be completed and all documentation will be retained on file for the required time period.			

Finding #16: Food Safety

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

Technical Assistance

During the review, temperature logs were discussed with the SFA. The SFA must maintain temperature logs for all food storage areas, in accordance with the requirements of the local health department. The completed temperature logs must be kept on file for a minimum of six (6) months.

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

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

Required SFA Response	SFA Response	Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a written statement that the SFA understands the requirements for food safety documentation, including that all temperature documents must be maintained for a minimum of six (6) months.			

Finding #17: Food Safety

Storage violations were observed on-site. The SFA had food that was not dated upon delivery.

Technical Assistance

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

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.			

Finding #18: Reporting and Record Keeping

Records were not retained for 3 years after the final Claim for Reimbursement for the fiscal year or until resolution of any audits. Provision 2 base year documentation, public release documentation, training records, and food safety inspections have not been maintained onsite.

Technical Assistance

Records must be retained for three (3) years after the final Claim for Reimbursement for the fiscal year or until the resolution of any audits. It was determined that the SFA was not retaining records for 3 years after the final Claim for Reimbursement. The requirement for the SFA to retain records for the required time period was discussed with the SFA.

For detailed regulation see: 210.23 (c) Retention of records.

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.			

<p>3. Provide a written statement that includes: an indication that records will now be maintained for required time period and that a process that has been put into place to ensure that all required records will be maintained for 3 years after the final claim for reimbursement or until the resolution of an audit.</p>			
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Finding #19: Resource Management

The SFA had an excess net cash resource balance of \$2,726.78.

Technical Assistance

The SFA may not accumulate net cash resources exceeding three months' average expenditures unless they receive prior approval from PED. The three month average expenses for the year were \$2,165.41 and ending net cash resources were \$4,892.19. Detailed explanations on how to calculate compliance with net cash resources were provided in an email during the review. The SFA will need to submit a detailed spend-down plan explaining how they will reduce the excess balance through allowable expenses. All allowable food service costs should accrue to Fund 21000, including labor. If this causes the food service fund to operate at a deficit, an operating transfer should be made to zero out any negative balance and show that the general fund supports food service operations.

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

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

Finding #20: Resource Management

Adult meals were underpriced.

Technical Assistance

Adult meals must be priced above cost. When cost data is not available, the SFA should charge at least the free per-meal reimbursements plus the value of commodities received. The SFA priced adult lunches at \$3.50 but should charge at least \$3.625 (\$3.39 USDA reimbursements + \$.2350 commodities). Adult breakfasts were priced at \$2.00, but the SFA should charge at least \$2.14. If the school board chooses to underprice adult meals, the deficiency must be supplemented by transferring nonfederal (general) funds into the food service account.

For detailed regulation see: FNS Instruction 782-5

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



1. Provide documentation showing that adult meal prices have increased as required, or show how the SFA is using non-federal funds to make up for the adult meal price deficiency.			
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: _____

Date: _____

Signature of CN Resource Reviewer: _____

Danielle Reidy

Date: _____

February 6, 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

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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>