

**State of New Mexico
Public Education Department**

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Lieutenant Governor

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Governor

Administrative Review Summary and Corrective Actions

SFA Name:	Pine Hills Ramah Navajo School Board
SFA Code/ ID Number:	624000
Administrative Review Conducted on:	Tuesday, February 12, 2019
SFA Contact Name and Title:	Dr. Loretta Lynch, Principal; Emma Yazzie, Head Cook
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; February 12, 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
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Administrative Review Technical Assistance Summary

SFA Name:	Pine Hills Ramah Navajo School Board
SFA Code/ID Number:	624000
Administrative Review Conducted on:	Tuesday, February 12, 2019
SFA Contact Name and title:	Dr. Loretta Lynch, Principal; Emma Yazzie, Head Cook
CNR Reviewer:	Jenna Lin, RDN

Commendations & Suggestions

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

Staff was friendly and accommodating.

Kitchen was clean.

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

Menu Review- recipes are not standardized, and not all are in written standardized format. Standardize the recipes so that true yields and portion sizes can be determined. To be standardized recipes must include:

- All ingredients in recipe.
- Correct measures and specific weight/measure of each ingredient.
- Serving/portion size(s) for each age/grade group.
- The true yield made by recipe.
- Clear and complete preparations steps / directions.

Civil Rights - During the review the requirement for the SFA to provide appropriate services to LEP households of various different languages was discussed. The SFA must make reasonable efforts to provide the potential household letter and applications in appropriate languages or have a translator available to assist households.

Professional Standards - 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. Ensure that forms are filled out to completion.

Required Corrective Actions- Menu Review

SFA Name:
Pine Hills Ramah Navajo School Board
 SFA ID Number:
 624000
 Week of Menu Review:
 1/7/19 - 1/10/19

Site(s) Selected for Review:

1 <i>Pine Hill School</i>	NSLP Grade Group: K-8, 9-12	SBP Grade Group: K-12	<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 grain. A grain 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 weekly requirement for the dark green 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 grain, weekly grain, and dark green 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.			
2. Submit any necessary documentation to demonstrate that the menu findings listed under step 1 are now corrected. This documentation may include: production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes. Reference the menu review results report for specific details and suggestions to bring the menu into compliance.			
3. List the steps that will be taken when a site does not have one of the planned menu items or there are insufficient quantities on the serving day.			
4. Provide a written statement that the serving line will be visually reviewed prior to service to confirm that all required components are available.			

5. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

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

SFA Name: Pine Hills Ramah Navajo School Board
 SFA Code/ID: 624000

Administrative Review Conducted: Tuesday, February 12, 2019
 Site(s) Selected for Review: Pine Hill 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 is claiming incomplete meals for reimbursement. Several students at breakfast and lunch did not have a milk on their tray.			
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 #2: Meal Components and Quantities	
Proper signage is not posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal for breakfast.	
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.

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 breakfast meal signage and lunch Offer vs Serve signage has been posted.			

Finding #3: Offer vs Serve

Offer vs. Serve is not being implemented properly. The SFA was not implementing Offer versus Serve for the required 9-12 grade group and does not have a waiver from the state.

Technical Assistance

During the review, requirements for Offer versus Serve were reviewed with the SFA. Requirements include that Senior high schools, grades 9-12, must participate in Offer vs. Serve.

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

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a written statement that Offer vs Serve is now being implemented for students in grades 9-12.			

Finding #4: Offer vs Serve

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

Technical Assistance

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

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

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide the date that the finding was brought into compliance or the planned date of completion.			

2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. List the steps the SFA will take to ensure that all staff will be trained annually on Offer versus Serve.			

Finding #5: Offer vs Serve

Offer versus Serve reimbursable meal signage is not posted, including the requirement for students to select at least 1/2 cup fruit or vegetable.

Technical Assistance

During the review, the requirement for Offer versus Serve meal signage was reviewed with the SFA. Requirements include identifying, near or at the beginning of the serving line(s), the food items that constitute a reimbursable meal, including the requirement that students must take at least 1/2 cup of the fruit or vegetable component.

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 written statement that Offer versus Serve reimbursable meal signage is now posted. In the statement provide the location where signage was posted.			

Finding #6: Civil Rights

The SFA did not maintain completed records of all the civil rights trainings.

Technical Assistance

During the on-site review the requirement to keep civil rights training documentation on file was reviewed with the SFA. The SFA must document the date the training was completed, the staff that attended and the topics that were covered.

For detailed regulation see: FNS Instruction 113-1 XI 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 a statement of assurance that a sign in sheet or other record to show civil rights training was provided will be maintained on file.			

Finding #7: Civil Rights

The SFA has not collected racial/ethnic data on an annual basis.

Technical Assistance

During the review the requirement to collected racial/ethnic data was discussed with the SFA. The SFA must collect racial/ethnic on an annual basis through the mechanism of their choosing.

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

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 racial/ethnic data collection sheet.			
4. Provide a statement of assurance that this information will be collected annually.			

Finding #8: 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:

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 #9: Local School Wellness Policy

The SFAs Local Wellness Policy does not contain all of the required components. The Wellness Policy does not have include a goals for nutrition education, nutrition promotion, school-based activities to promote student wellness or physical activity. The policy has not been made available to the public. There is no document available indicating that the policy has been reviewed and/or updated.

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

Required Corrective Actions- Review Areas

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 the link or copy of the completed Local Wellness Policy.			

Finding #10: Food Safety, 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 #11: Food Safety, Storage, and Buy American

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 #12: Food Safety, Storage, and Buy American

Storage violations were observed on-site. 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 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 date the product was opened.			

Finding #13: Food Safety, Storage, and Buy American

Storage violations were observed on-site. The SFA had improper storing order of cold food items.

Technical Assistance

During the review, storage requirements were discussed with the SFA. The SFA must ensure the following order of cold storage from top to bottom: breads, produce, cooked meats, raw meats.

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 cold storage will be properly ordered.			

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

By checking this box you confirm that all of the above responses have been provided to all applicable staff to bring all finding areas into compliance moving forward. **Required Corrective Actions, Review Areas**... the SFA in addition the SFA ensures that additional training will be

Signature of SFA Representative: _____
 Signature of CN Resource Reviewer: *Jenna Jin*

Date: _____
 Date: February 12, 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>