

**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:	Questa Independent Schools
SFA Code/ ID Number:	079000
Administrative Review Conducted on:	Tuesday, February 5, 2019
SFA Contact Name and Title:	Pat Aragon, Food Service Director
CNR Reviewer:	Debbie Hawkins, David Christensen, Emily Lott

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on February 5, 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:	Questa Independent Schools
SFA Code/ID Number:	079000
Administrative Review Conducted on:	Tuesday, February 5, 2019
SFA Contact Name and title:	Patricia Aragon, Food Service Director
CNR Reviewer:	Debbie Hawkins, David Christensen, Emily Lott

Commendations & Suggestions

Outstanding job meeting all meal pattern requirements for breakfast. All daily and weekly breakfast meal component and food quantity requirements were met for the week of menu review.
Great job serving all whole grain-rich products for breakfast and lunch week of menu review!
Thank you for your kind accommodations during the review. We appreciate you being organized.
The students were well trained to take the required components and seemed to enjoy the meals. It was fun to see how well they got along.

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

Meal Signage - Initially meal signage was not posted for breakfast. Technical assistance was provided regarding the requirement and signage was posted prior to lunch meal service. No further CA is required.
Local Wellness Policy - Technical assistance was provided regarding posting the policy to the school website once it is approved.
Fresh Fruit and Vegetable Program - A review of program requirements was provided as they are getting ready to start the FFVP.
Professional Standards - There is no one assigned as director of the program. Technical assistance provided that someone must assume oversight and complete the appropriate professional standards hours.
Food Safety - Initially the food safety inspections were filed away. Technical assistance was provided regarding posting the most current inspection in a public place. The inspection was posted prior to lunch service. No further corrective action is required.

Required Corrective Actions- Menu Review

SFA Name: *Questa Independent Schools*
 SFA ID Number: *079000*
 Week of Menu Review: *12/3/18 - 12/6/18*

Site(s) Selected for Review:

<i>1 Rio Costilla Southwest Learning Acc</i>	NSLP Grade Group: K-8	SBP Grade Group: K-8	<input type="checkbox"/> N/A
<i>2 N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
<i>3 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 weekly requirement for the starchy 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 weekly starchy vegetable subgroup requirement is now met. Include details to describe what specific changes were made to the menu to correct all menu review findings and bring the menu into compliance.			
2. Submit any necessary documentation to demonstrate that the menu findings listed under step 1 are now corrected. This documentation may include: production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes. Reference the menu review results report for specific details and suggestions to bring the menu into compliance.			
3. List the steps that will be taken when a site does not have one of the planned menu items or there are insufficient quantities on the serving day.			
4. Provide a written statement that the serving line will be visually reviewed prior to service to confirm that all required components are available.			
5. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.			



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

SFA Name: Questa Independent Schools

SFA Code/ID: 079000

Administrative Review Conducted: Tuesday, February 5, 2019

Site(s) Selected for Review: Rio Costilla Southwest Learning Academy

 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: 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.			
<i>For detailed regulation see: 210.13(b) Food safety inspections.</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 written statement that the SFA will annually request two inspections be completed and all documentation will be retained on			

Finding #2: 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, including meal count documents.	
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.			
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.			

Finding #3: Resource Management

The SFA had an excess net cash resource balance of \$60,866.

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 \$76,849, and ending net cash resources were \$137,735. Detailed explanations for how these numbers were calculated were provided in an email to the SFA. The SFA will need to submit a spend-down plan explaining how they will reduce the excess balance through allowable expenses. This should include estimated dates and amounts of any planned expenses, as well as an expected timeline for spending down the balance. Examples of allowable expenses include purchasing new equipment, improving food quality, upgrading food service software, implementing additional food service training, attending food service conferences, increasing food service wages and benefits where appropriate, etc. in order to improve the food service program. The SFA should implement internal controls to better monitor compliance with net cash resource limitations.

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

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
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.			
2. Provide a written statement explaining the internal controls that have been put into place to better monitor compliance with net cash resource limitations.			
3. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			

Finding #4: 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

Required Corrective Actions- Review Areas

commodities received. The SFA priced adult lunches at \$2.75 but should charge at least \$3.625 (\$3.39 USDA reimbursements + \$.2350 commodities). The SFA is in the process of increasing adult meal prices and will need to provide documentation showing that the price increase was approved by the school board. 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: Debbie Hawkins

Date: February 5, 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>