

**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:	Saint Bonaventure School
SFA Code/ ID Number:	043141
Administrative Review Conducted on:	Thursday, February 14, 2019
SFA Contact Name and Title:	Celena Kahn-Hunter, Food Service Director
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 02/14/19; 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
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Administrative Review Technical Assistance Summary

SFA Name:	Saint Bonaventure School
SFA Code/ID Number:	043141
Administrative Review Conducted on:	Thursday, February 14, 2019
SFA Contact Name and title:	Celena Kahn-Hunter, Food Service Director
CNR Reviewer:	Jenna Lin, RDN

Commendations & Suggestions

Kitchen staff adapted quickly to an emergency situation.

Kitchen was clean.

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

Menu Review- many of the standardized recipes provided did not match the labels that were submitted or responses of how they were prepared. Recipes should be kept that include the actual ingredients ordered and any modifications made should be noted.

Meal Components and Quantities - Production record not filled out to completion or with proper conversions. Milk serving size not recorded on production record for PK-8. M/MA, vegetables, grains exceeded PK serving size for lunch. Exceeded PK grains for breakfast. M/MA, grains exceeded K-8 for lunch. TA provided.

Meal Components and Quantities - SFA stated that there is one student who has an MD note that she is lactose intolerant, but that the student chooses to bring her own milk. SFA does not have documentation on file for the student choosing to bring her own milk. Reviewer provided TA that documentation should be on file if the lactose intolerant student chooses to bring her own milk.

Civil Rights - During the review the requirement for the SFA to provide appropriate services to LEP households was discussed. Since the SFA has LEP households, they must make reasonable efforts to provide the household letter and applications in appropriate languages or have a translator available to assist households.

Local Wellness Policy and School Meal Environment - 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.

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. Cumulative totals should be filled in on tracker. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

Resource Management - The SFA included utilities and other shared expenses on the Statement of Activities for food service. Indirect costs cannot be charged to the child nutrition programs without an indirect cost rate assigned by PED. Indirect costs may be calculated for internal reporting purposes, but records submitted during reviews of the program should not show indirect costs were allocated to the food service account without an Indirect Cost Rate Agreement on file with PED. Any direct allocation of shared expenses must be based on proportional benefit and follow other allowable cost regulations. A cost driver such as square footage may be used to allocate the proportional benefit across multiple programs, as long as the cost driver is a reasonable reflection of actual usage. Additional technical assistance was provided via email.

Resource Management - Adult meal revenue should accrue to the food service program. The decision to use nonfederal funds for adult meals must be thoroughly documented. It is not sufficient to say the school pays for the adult meals by absorbing the food service program deficit. If adults will not be charged directly, the school must transfer funds into food service to pay for the meals. The calculation for adult meal food costs should reflect the actual number of free adult meals served multiplied by a sufficient adult meal price. The adult meal price should be at least the free USDA reimbursement rate + value of commodities. For SY 18-19, this comes to \$3.625 for lunch. The SFA's rate of \$1.60 per staff meal is not sufficient to cover adult meal costs. The adult meals paid by the school fund should accrue as revenue to the food service account. The "Adult Meals Served" line currently listed on the Combined Statement of Activities should be reported on the Food Service Statement of Activities, either under revenues or as a separate line credited to food service expenses.

Required Corrective Actions- Menu Review

SFA Name: *Saint Bonaventure School*
 SFA ID Number: *043141*
 Week of Menu Review: *1/7/19 - 1/11/19*

Site(s) Selected for Review:

1 <i>Saint Bonaventure School</i>	NSLP Grade Group: <i>K_5, 6-8</i>	SBP Grade Group: <i>K-8</i>	<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

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.

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 and weekly meat/meat alternate 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.			

Menu Review Findings: Breakfast

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.

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.
1. Provide a written statement that the fruit 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: Saint Bonaventure School
 SFA Code/ID: 043141

Administrative Review Conducted: Thursday, February 14, 2019
 Site(s) Selected for Review: Saint Bonaventure School
N/A
N/A

Date Corrective Action Plan was provided to SFA: 3/28/2019

Due Date for Corrective Action Plan: 4/28/2019

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 underclaimed on SBP, NSLP, and ASP.			
Technical Assistance			
During the review, edit checks were discussed with the SFA. The edit check is not completed. To be in compliance, the SFA must ensure that edit checks are completed accurately. Maintaining an accurate edit check and how to evaluate an edit check for accuracy was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.			
<i>For detailed regulation see: 210.7(c)(1) Lunch count system.</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			
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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 meal signage has been posted.			

Finding #3: 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 #4: Food Safety, 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 #5: Food Safety, 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 inspections be completed moving forward.			
4. Provide a copy of the inspection request.			

Finding #6: 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 #7: Food Safety, Storage, and Buy American

Storage violations were observed on-site. The SFA had food that was not stored 6 inches from the ceiling.

Technical Assistance

During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is stored at least six (6) inches from the ceiling.

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 is stored at least six (6) inches from the ceiling.			

Finding #8: The NSLP Afterschool Snack Service

Production records were not complete for each day of the review period.

Technical Assistance

During the review, production record requirements were discussed with the SFA. The SFA must complete production records as described in 7 CFR 210.10(a)(3). How to complete these records was discussed with the SFA. This finding may result in fiscal action.

For detailed regulation see: 210.10(a)(3) Production and menu 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 statement of understanding that the SFA must complete production records for the snack program that contain all required information.			
4. Provide revised production records for each day of the review period.			

Finding #9: The NSLP Afterschool Snack Service

The program is not monitored twice per year. The program was not monitored within the first 4 weeks of operation.

Technical Assistance

During the review, program monitoring was discussed with the SFA. The SFA must monitor the program twice per year. The SFA must monitor the program within the first 4 weeks of operation.

For detailed regulation see: SP 99-4: 7 CFR section 210.23(c).

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 monitor the Afterschool Snack Program twice per year, and once within the first 4 weeks of operation.			
4. The SFA must also complete the monitoring reviews and submit them or, if early in the year, must provide the date when monitoring will occur.			

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 14, 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>