



Administrative Review Summary and Corrective Actions

SFA Name:	Benet Lake Child/Adolescent Treatment Center
SFA Code/ ID Number:	302645
Administrative Review Conducted on:	March 20,2018

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on March 20,2018 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.

Section 207 of the Healthy, Hunger Free Kids Act amended section 22 of the NSLA (42 U.S.C.1769c) to require State agency to post a summary of the most recent final administrative review results for each SFA on the State agency's publicly available website, and the SFA is strongly encouraged to post a summary on the SFA's public website. To meet this requirement, a copy of the full Administrative Review Summary Report will be posted on the School Nutrition Team website at <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review> within 30 days of the SFA receiving the final AR report.

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 28, 2018**. 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.

Fiscal action is required to be calculated per 7 CFR 210.18 for critical violations to reclaim unearned reimbursement. In addition, withholding of program payments is required if documentation of corrective action is not received within 30 days of the date negotiated at the exit conference, or as later extended upon written request if extraordinary circumstances delay completion of corrective action within the originally negotiated timeframe. Uncorrected errors are subject to reclaim for the entire school year.

Any potential fiscal action will be calculated once the corrective action responses have been received and approved. You have the right to appeal the denial of all or part of a claim for reimbursement or withholding of funds. If applicable, appeal rights will be provided with the notification of the fiscal action calculation. Please note, there is the possibility of a follow-up review should corrective action not be completed or to verify corrective action was completed system-wide, as appropriate.

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.

Thank you,

Ahn Ei Sweeney, RD, SNS, Senior Vice President

CN Resource

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Administrative Review Technical Assistance Summary

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Commendations & Suggestions

Outstanding job meeting all of the requirements for breakfast and lunch. All daily and weekly meal component and food quantity requirements were met for the week of menu review.

Everyone was very helpful. They were willing to share the processes of all aspects of their duties.

All staff were well prepared for the review; they provided all information needed to successfully complete the review.

The meals were colorful and fresh.

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

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 assessment. After assessment they should post update on the SFA website.

Resource Management - Annual Financial Report

On the SY 16-17 AFR, the SFA reported the general fund support as part of School Food Revenue, instead of under the "Operating Transfer from Non-Food Service Account" column. The SFA should read through the DPI instructions on how to complete the report. Instructions can be found under "Annual Food Service Financial Report" on DPI's financial website: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>

Resource Management - Nonprogram Costs

The SFA should separate program food costs from nonprogram food costs. If possible, the SFA should have separate expense codes for program food costs and nonprogram food costs. Since the FSMC separates the costs of the reimbursable breakfasts and lunches from the costs of the non-reimbursable foods on their monthly invoices, the SFA can show that USDA funds are only being used to pay for reimbursable meal costs. The SFA should track the total costs charged by the FSMC for reimbursable meals, and report this amount as total expenses on their Annual Financial Report.

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Administrative Review Conducted: March 20,2018
 Site(s) Selected for Review: 0
0
0

Date Corrective Action Plan was provided to SFA: 3/28/2018

Due Date for Corrective Action Plan: 4/28/2018

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: 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.			
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 #2: Smart Snack

The SFA is selling items that do not meet the Smart Snacks nutrition standards for beverages sold to elementary, Middle, High school students during the school day.

Technical Assistance

During the review, beverage rules under Smart Snacks were discussed with the SFA. The SFA must ensure that all beverages meet the requirements, based on the level of the school (elementary, middle, high) where they are sold.

210.11 (m)(1) Elementary schools(2) Middle Schools (3) High Schools

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 items sold to students during the day meet Smart Snacks nutrition standards.			

Finding #3: 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 #4: Outreach

Breakfast outreach did not occur throughout the school year.

Technical Assistance

It was determined that the SFA has not performed breakfast outreach. Breakfast outreach must occur prior to or at the beginning of the school year, as well as throughout the school year. Examples of outreach such as posting the menus on the SFA's website, parent newsletters and district-wide emails were discussed with the SFA.

For detailed regulation see: 210.12(d) Outreach activities. (1)

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 conduct outreach on the availability of breakfast prior to or at the beginning of the school year and again multiple times throughout the year.			

Finding #5: Outreach

The SFA has not performed SFSP outreach.

Technical Assistance

It was determined during the review that the SFA has not performed SFSP outreach. The SFA must perform SFSP outreach before the end of the school year. Methods of outreach such as posting SFSP information on the SFA's website, parent newsletters and district-wide emails were discussed with the SFA. Schools may fulfill this requirement through Robo calls, flyers or other methods that notify the community of locations of summer meal sites. Methods to locate sites that serve free meals to children during the summer include the following:

- Call 211
- Call 1.866.3Hungry or 1.877.8Hambre
- Visit the website: www.fns.usda.gov/summerfoodrocks (note, this replaces the whyhunger.org website)
- Use the site locator for smartphones - Rangeapp.org

For detailed regulation see: 210.12(d) Outreach activities. (2)

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.			

Required Corrective Actions- Review Areas

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 cooperate with Summer Food Service Program sponsors to conduct outreach on the availability of the Summer Food Service Program.			

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.

If you have any questions, feel free to contact CN Resource at your convenience. Thank you.



Administrative Review Team

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