



## Administrative Review Summary and Corrective Actions

SFA Name:	Wheatland Jt. #1 School District
SFA Code/ ID Number:	306412
Administrative Review Conducted on:	January 11,2018

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on January 11, 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 **March 9, 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.

## Administrative Review Technical Assistance Summary

SFA Name:	Wheatland Jt. #1 School District
SFA Code/ID Number:	306412
Administrative Review Conducted on:	January 11, 2018

Commendations & Suggestions
Thank you for completing the Paid Lunch Equity Tool each year and adhering to the pricing requirements for both paid student lunches and adult meals.
All staff worked well together for a nice meal service.
Thank you for taking the time to answer all of the questions during the day of review. Your efforts were appreciated.

Other areas of Technical Assistance (Does NOT require SFA Response)
Menu Review- technical assistance was provided in an email to the SFA with the menu review results. Suggestions were provided to bring the menus into compliance.
Menu Review- production records do not provide adequate information as recorded. It is a requirement of the federal regulations to maintain production records. -Salad Bar production records were inconsistent with what was originally provided. Although records were sent, the original documentation did not indicate that many different types of vegetables and salads were served. Include all food items served on all production records for each day. -Serving sizes do not match what is being offered, per communication with the SFA. On the salad bar, there are multiple different meat/meat alternate items offered each day. Each item served does not provide 1.5oz meat/meat alternate serving. For example, (see the ham Child Nutrition label), each portion of 1.2 oz. ham is required for a 1 oz. eq. If a serving of 1.5 oz. eq. is to be met, a 2 oz. portion of ham must be served. Be sure to check Child Nutrition labels and Product Formulation Sheets when planning the portion sizes of food items served.
Resource Management - Adult Meals The SFA misreported the adult lunch price in their DPI contract for SY 17-18. The SFA reported a price of \$3.52, but actually charges \$3.50. The SFA should be more careful when reporting meal prices on their DPI contract, to ensure that DPI receives accurate pricing information for both adults and students.
Resource Management - Nonprogram Food Revenue Tool The SFA made an error on their Nonprogram Food Revenue Tool. The selling prices + USDA reimbursements column for the program foods section was completed incorrectly. The SFA should use their current price + USDA reimbursement for each category. The rates were updated by the reviewer, and a revised copy of the tool was sent to the SFA. Updated reimbursement rates can be found on DPI's Financial Management website: <a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial">https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial</a>
The meal point of service software you are using has the attendance factor set to 100%. Please enter an accurate attendance factor for all of your schools. This will ensure a proper edit check can be completed each month.

SFA Name: *Wheatland Jt. #1 School District*  
 SFA ID Number: *306412*  
 Week of Menu Review: *12/4/17 - 12/8/17*

Site(s) Selected for Review:			
<i>1 Wheatland Center School</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**

**Site 1:**

- For the week of menu review, the lunch menu did not meet the minimum grain requirements. The minimum portion size was not met and not all grains offered at lunch were whole grain-rich. This contributed to not meeting the following requirements: daily grain, weekly grain, and whole grain-rich.
- 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.

**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, daily vegetable, 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.			
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, not all grains offered at breakfast were whole grain-rich. This contributed to not meeting the following requirements: daily grain, weekly grain, and whole grain-rich. Meat/meat alternate products may credit towards the weekly grain requirement, once the daily grain requirement is met with a whole grain-rich product.

### 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 daily grain, weekly grain, 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.			
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.			

SFA Name: Wheatland Jt. #1 School District  
 SFA Code/ID: 306412

Administrative Review Conducted: January 11,2018  
 Site(s) Selected for Review: Wheatland Center School  
N/A  
N/A

Date Corrective Action Plan was provided to SFA: 2/9/2018

Due Date for Corrective Action Plan: 3/11/2018

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: Benefit Issuance**

Changes are not being made to the point of service benefit issuance document in a correct manner regarding the 30 days of carryover eligibility. When a new eligibility is established (either through direct certification or a meal benefit application), the new status takes precedence over the status of the prior year’s eligibility. The SFA is not updating the eligibility on the 30th operating day.

**Technical Assistance**

During the review, updating the point of service and allowing a full 30 days of prior eligibility was discussed with the SFA. Students must be allowed a full 30 operating days of prior eligibility, and when this expires, the SFA must make the appropriate updates at the point of service.

**245.6(c)(2) Application, eligibility and certification**

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 plan to ensure that changes to the point of service will be made when new current school year meal benefit information is obtained and if nothing is received, the status will be changed to paid after the 30 day carryover period expires.			

**Finding #2: 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).

**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 #3: 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.

**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.			
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.			

**Finding #4: Resource Management**

The SFA has not sufficiently priced its nonprogram foods to be in compliance with revenue from nonprogram food requirements.

**Technical Assistance**

The SFA did not complete the NonProgram Food Revenue Tool prior to the review. During the review, the SFA completed the tool and it showed the SFA was out of compliance. The SFA needed \$162 in additional nonprogram revenue to be in compliance, which comes to an annual deficiency of approximately \$5,832.00. The SFA will need to increase extra milk, adult meal, and salad prices to come into compliance with the tool. The NonProgram Food Revenue Tool must be completed every year, and nonprogram food prices increased if the tool shows the SFA did not price its nonprogram foods at a sufficient rate to ensure its revenue ratio equaled or exceeded its food cost ratio. If nonprogram food prices will not be increased, the SFA should transfer nonfederal funds into the food service account. This would be reported under the "Transfer from Non-Food Service Account- NonProgram Food Revenue" column on the annual financial report.

*For detailed regulation see: 210.14(f) Revenue from nonprogram foods.*

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. List the steps the SFA will take to increase nonprogram food revenues. This should include the specific price increases and the date the increases will take effect.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a written statement of understanding that the DPI Nonprogram Food Revenue Tool will be completed each year. This should include a timeframe for when the tool will be completed and assurance that the SFA will take the necessary steps to come into compliance if the tool shows they did not generate sufficient nonfederal revenue.			

**Finding #5: Verification**

When a student’s eligibility changed due to verification, the SFA did not make updates of the eligibility status on the benefit issuance list.

**Technical Assistance**

During the review, updating eligibility that changed due to verification was discussed with the SFA. The SFA must update a student's eligibility that has changed due to verification.

*For detailed regulation see: 245.6a(f)(7) Eligibility changes.*

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

## Required Corrective Actions- Review Areas

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 update a student's eligibility that has changed due to verification.			
4. Provide copies of the letters of adverse action that were sent to the households.			
5. Provide a copy of the benefit issuance list that shows that the benefits were changed and when.			

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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