



Administrative Review Summary and Corrective Actions

SFA Name:	West Salem School District
SFA Code/ ID Number:	326370
Administrative Review Conducted on:	Wednesday, May 2, 2018

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on May 2, 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 **June 14, 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

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Commendations & Suggestions

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

Great work meeting the whole grain-rich requirement for breakfast and lunch, for the week of menu review!

There were no resource management findings. 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.

The SFA does a great job using local small businesses to procure fresh foods as well as growing some of their own food.

Menus offer a wide variety of items and all meals are well presented.

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

Menu Review- technical assistance was provided in an email to the SFA with the lunch menu review results. Suggestions were provided to bring the menus into compliance.

Menu Review- ensure recipes accurately list all items that are offered with each menu item and that the amounts of each item in your recipes are accurate to what you serve. For example, the Bistro Box recipes needed several clarifications to determine all items and serving sizes for each item. Also, several clarifications were needed to determine all items served with some of the entree salads and other menu items, particularly the grain component. Ensure that your recipes are complete and match what is being served.

Local School Wellness Policy - 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.

SFA Name:	Site(s) Selected for Review:			
West Salem School District	1 West Salem High School	NSLP Grade Group: 9-12	SBP Grade Group: 9-12	<input type="checkbox"/> N/A
SFA ID Number:	2 N/A	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
326370	3 N/A	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
Week of Menu Review:	3/5/18 - 3/9/18			

Menu Review Findings: Lunch

Site 1:
 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.

On the day of review, the lunch menu did not meet the minimum daily requirement for meat/meat alternate. A meat/meat alternate was offered daily, however the minimum required portion size was not met. The peanut butter bistro box and the hummus bistro box did not meet the daily minimum.

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.			

Required Corrective Actions- Menu Review

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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 Site(s) Selected for Review: West Salem High School
N/A
N/A

Date Corrective Action Plan was provided to SFA: 5/10/2018

Due Date for Corrective Action Plan: 6/14/2018

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: Certification and Benefit Issuance			
Not all selected applications were approved correctly. The SFA did not calculate the income correctly.			
Technical Assistance			
During the review, determining applications was discussed with the SFA. When determining eligibility, the SFA must ensure that the household has listed the amounts, source, and frequency of current income for each household member; otherwise, the application is incomplete. For more information, see the Eligibility Manual for School Meals, Chapter 3. When determining the total household income the SFA must use all income provided on the application.			
<i>For detailed regulation see: 245.6(c)(4) Application, eligibility and certification of children for free and reduced price meals and free milk</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 staff approving applications understand the requirements.			
4. Describe how all applications will be determined correctly moving forward.			
5. Provide copies of each of the corrected applications, with the date corrected indicated, and letters to the household(s) if there is a change in eligibility status.			

Finding #2: Certification and Benefit Issuance	
The SFA did not accurately transfer the correct benefit from the eligibility determination document to the Point of Service benefit issuance document.	
Technical Assistance	

During the review, accurately updating the point of service was discussed with the SFA. The SFA must transfer the correct benefit from the eligibility determination document to the Point of Service benefit issuance document. Updates to the point of service document must be made in a timely fashion.

For detailed regulation see: 210.8(a) Claims for Reimbursement

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 plan for how the point of service will always have the correct benefit information.			

Finding #3: Verification

The SFA's verification process is not being conducted according to USDA guidelines. The SFA did not maintain documentation to demonstrate compliance with the verification requirements.

Technical Assistance

During the review, maintaining documentation to demonstrate compliance with the verification requirements was discussed with the SFA. The SFA must maintain on file documentation for each household as described in the Eligibility Manual for School Meals, Chapter 6.

For detailed regulation see: 245.6a(h) Verification Reporting and Record Keeping Requirements

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 maintain records to demonstrate compliance with the verification requirements for each household.			

Finding #4: Verification

The SFA did not meet the follow-up requirements for households that failed to respond to the request for verification. The SFA did not document the follow-up.

Technical Assistance

During the on-site review, documenting follow-up attempts was discussed with the SFA. The SFA must make and document at least one follow-up attempt.

For detailed regulation see: 245.6a(f)(6) Follow-up attempts.

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 make and document at least one follow-up attempt for households that failed to respond to the request for verification.			

Finding #5: Meal Components and Quantities/Offer versus 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 is using the incorrect civil rights statement. They are using an outdated version of the statement on approval/denial letters and public release.

Technical Assistance

During the review the requirement for the civil rights statement to appear on all Program material was discussed with the SFA. The SFA must use the current statement on all Program material.

For detailed regulation see: FNS Instruction 113-1 IX A 3 Nondiscrimination Statement.

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 current non-discrimination statement has been added to all nutrition program materials.			

4. Provide a copy of an updated approval/denial letter to show that the non-discrimination statement has been added.			
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Finding #7: On-site Monitoring

The SFA did not complete on-site monitoring for breakfast by February 1st and an extension was not requested.

Technical Assistance

During the review, the requirement for on-site monitoring was reviewed with the SFA. It was determined that the SFA is not completing on-site monitoring for all or some of the sites within the SFA. Since the SFA has multiple sites, they are required to monitor the lunch counting and claiming system for each site in the SFA prior to February 1st of each year. The SFA was provided with the link to the USDA memo that includes a sample monitoring form. If the SFA chooses to create their own monitoring form, at a minimum it must include all information that is on the USDA monitoring form. <https://fns-prod.azureedge.net/sites/default/files/cn/SP56-2016os.pdf>

For detailed regulation see: 210.8(a)(1) On-site reviews.

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 on-site monitoring will be completed for all sites by February 1, each year moving forward.			
4. Provide the breakfast on-site monitoring forms that have been completed for the current school year.			

Finding #8: Smart Snacks

The SFA is selling items that do not meet the Smart Snacks nutrition standards for beverages sold to high school students during the school day. The SFA must also run all food and beverages through the Smart Snack Calculator and/or check against the Smart Snack Guidelines before selling 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. The SFA should keep all Smart Snack calculator printouts within their files.

For detailed regulation see: 210.11 (m)(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.			
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Finding #9: 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 #10: Summer Food Service 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.			
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.



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