



## Administrative Review Summary and Corrective Actions

SFA Name:	St. Anthony's School
SFA Code/ ID Number:	427376
Administrative Review Conducted on:	Thursday, November 30, 2017

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on November 30, 2017; 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 **1/29/18**. 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:	St. Anthony's School
SFA Code/ID Number:	427376
Administrative Review Conducted on:	Thursday, November 30, 2017

Commendations & Suggestions
Great job meeting all fruit and vegetable requirements 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.
Thank you for being prepared and well organized for the review.

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.
Certification and Benefit Issuance - During the review, updating the point of service was discussed with the SFA. When eligibility changes, the SFA must make these updates at the point of service. When there is an increase in benefits the SFA should make the change immediately, if there is a decrease or termination in benefits the household should be provided 10 days of adverse action before the status is changed.
Civil Rights - During the on-site review the requirement to provide a yearly civil rights training was discussed with the SFA. The SFA must provide civil rights training at least once a year to all frontline staff and supervisor and maintain all required documentation.
Local School Wellness Policy - During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to allow certain parties - parents, students, representatives of the school food authority, teachers of physical education, school health professions, the school board, school administrators, and the general public - to participate in the development, implementation, periodic review, and update of the Local Wellness Policy.
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 at least once every three years. The results of the assessment must be made available to the public.
During the review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to contain the following: a designation of one or more SFA officials in charge of school compliance oversight; a plan for measuring compliance; goals for nutrition education, nutrition promotion, other school based activities to promote student wellness, and physical activity; and guidance for all foods available on school campus. The SFA should also contact the state agency to determine if there are any additional requirements from the state or if they have any state specific resources. The SFA was provided with the USDA link for Wellness Policies. <a href="http://www.fns.usda.gov/tn/local-school-wellness-policy">http://www.fns.usda.gov/tn/local-school-wellness-policy</a>
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. For further information, please see the USDA's
During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated once opened.
During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated upon delivery.

SFA Name:	Site(s) Selected for Review:		
St. Anthony's School	1 St. Anthony's School	NSLP Grade Group: K-5	SBP Grade Group: <input checked="" type="checkbox"/> N/A
SFA ID Number:	2 N/A	NSLP Grade Group:	SBP Grade Group: <input type="checkbox"/> N/A
427376	3 N/A	NSLP Grade Group:	SBP Grade Group: <input type="checkbox"/> N/A
Week of Menu Review:	10/2/17 - 10/6/17		

**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 and whole grain-rich.

**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 all menus will be reviewed to ensure that all components are offered in at least the minimum amount required to meet the daily and weekly requirements.			
2. 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.			
3. Provide a written statement that the serving line will be visually reviewed prior to service to confirm that all required components are available.			
4. Submit the position title(s) of the SFA representative(s) that will oversee this area and ensure future compliance.			
5. Submit 1 week of menus and production records that indicate all menu items, the portion size and the component contribution for each item.			
6. Provide labels, ingredient lists, CN labels, product formulation statements, and revised or new recipes as needed for any items that have been added to the menu, if they have replaced an item, indicate the item that it replaced.			

SFA Name: St. Anthony's School  
 SFA Code/ID: 427376

Administrative Review Conducted: Thursday, November 30, 2017  
 Site(s) Selected for Review: St. Anthony's School  
N/A  
N/A

Date Corrective Action Plan was provided to SFA: 12/29/2017

Due Date for Corrective Action Plan: 1/29/2018

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			
At the beginning of the year, the SFA does not properly handle the status of children who received benefits the previous school year. The SFA has not been implementing the 30-day carry-over status. All students, regardless of the previous years status revert to paid status at the beginning of the new school year.			
Technical Assistance			
During the review, properly handling the status of children for whom an application has not been submitted was discussed with the SFA. If a child has not submitted and application or is not on the Direct Certification list the student will either receive carryover status from the previous year if applicable or will be considered "paid" until an application is received and approved based on the information provided on the application. A student is only eligible for carryover benefits if during the previous school year they were enrolled within the SFA and were receiving free or reduced meal benefits. Additionally, if a new student is enrolled in the SFA and they have other household members that attended in the previous year, the carryover status may be extended to this child. Carryover status only applies for the first 30 operating days of the school year or until a new application is approved, whichever comes first. The SFA may not backdate eligibility statuses for students who submit an application after the beginning of the school year.			
For detailed regulation see: 245.6(c) 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 statement of understanding that the SFA will implement the 30-day carryover status for students who were enrolled in the SFA and were receiving free or reduced meal benefits.			

Finding #2: Verification

The SFA's verification process is not being conducted according to USDA guidelines. The SFA did not establish the sample pool accurately. The SFA is not selecting from error prone applications.

#### Technical Assistance

During the review, establishing the sample pool was discussed with the SFA. The SFA must establish the sample pool exactly as described in the Eligibility Manual for School Meals, Chapter 4.

*For detailed regulation see: Eligibility Manual, Chapter 4A*

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 establish the sample pool for verification.			

#### Finding #3: Verification

The SFA does not have documentation demonstrating that a confirmation review took place.

#### Technical Assistance

During the review, documenting the confirmation review was discussed with the SFA. The SFA must conduct confirmation reviews and maintain documentation that these took place.

*For detailed regulation see: 245.6a(e) Activities prior to household notification*

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 will complete a confirmation review on all applications that are selected for verification.			

#### Finding #4: Meal Counting and Claiming

The SFA is not providing meals to students during field trips though students are scheduled to be in school during this time.

#### Technical Assistance

During the review, claiming meals during field trips was discussed with the SFA. The SFA is not providing meals to students during field trips though students are scheduled to be in school during this time. To be in compliance, the SFA must ensure that meals are provided to students during field trips if students are normally scheduled to be in school during the time of the field trip. The SFA acknowledged the finding and will implement needed changes immediately.

<i>For detailed regulation see: 210.9(b) Agreement.</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 make meals available to all students during field trips that occur during the normal school day.			

### Finding #5: Meal Counting and Claiming

The SFA does not have a meal charge policy on file.

#### Technical Assistance

During the review the requirement for a meal charge policy was discussed with the SFA. Per the USDA memo 46-2016 all SFAs are required to have a written policy on file.

*For detailed regulation see: SP 46-2016: Unpaid Meal Charges*

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 copy of the SFA created meal charge policy.			

### Finding #6: Civil Rights

The SFA does not have a procedure in place for handling civil rights complaints.

#### Technical Assistance

During the review the requirement for the SFA to have a complaint procedure was discussed. The procedure must indicate: that any person or representative alleging discrimination based on a prohibited basis has the right to file a complaint; all complaints, written or verbal, must be forwarded to the appropriate Regional or FNS OCR Director, unless an approved State complaint procedure is in place; in the event a complainant makes the allegations verbally or in person and refuses or is not inclined to place such allegations in writing, the person to whom the allegations are made must write up the elements of the complaint for the complainant. The procedure must also identify the outside agency to which the complaints are forwarded.

*For detailed regulation see: FNS Instruction 113-1 Section XV Complaint Procedures*

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 procedure for how the SFA will handle any alleged civil rights complaints.			

**Finding #7: Food Safety, Storage & 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 #8: SBP and SFSP 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](http://www.fns.usda.gov/summerfoodrocks) (note, this replaces the [whyhunger.org](http://whyhunger.org) website)
- Use the site locator for smartphones - [Rangeapp.org](http://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](http://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*  
 CN Resource  
 P.O. Box 31060  
 Mesa, AZ 85275  
 866-941-6368  
[adminreview@cnresource.com](mailto:adminreview@cnresource.com)