



Administrative Review Summary and Corrective Actions

SFA Name:	Freedom Area School District
SFA Code/ ID Number:	441953
Administrative Review Conducted on:	Saturday, December 15, 2018

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on December 15, 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 **February 12, 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

Great job meeting the whole grain-rich requirement for lunch, for the week of menu review.

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 Food Service staff at Freedom High School was very helpful and knowledgeable about food service requirements.

Greg the Food Service Director was very accommodating during the review. He was eager to demonstrate his knowledge of the all programs he is responsible for.

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.

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. The results of the assessment must be made available to the public.

During the review, health inspections were discussed with the SFA. The SFA must post a copy of the most recent food safety inspection in a publicly visible location at the site.

SFA Name: <i>Freedom Area School District</i>	Site(s) Selected for Review: 1 <i>Freedom High School</i>	NSLP Grade Group: 9-12	SBP Grade Group: 9-12	<input type="checkbox"/> N/A
SFA ID Number: 441953	2 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
Week of Menu Review: 11/13/17 - 11/17/17	3 <i>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 daily and weekly requirements for grain. A grain was offered daily, however the minimum daily and weekly requirements were not met.
- 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 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.			
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Menu Review Findings: Breakfast

1. 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 and whole grain-rich.
2. For the week of menu review, the breakfast 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 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 as applicable.			
2. Provide a written process for sites to reference when they do not have one of the planned menu items or there are insufficient quantities on the serving day.			
3. Provide a 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: Freedom Area School District
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Administrative Review Conducted: Saturday, December 15, 2018
 Site(s) Selected for Review: Freedom High School
N/A
N/A

Date Corrective Action Plan was provided to SFA: 1/12/2018

Due Date for Corrective Action Plan: 2/12/2018

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: Resource Management			
The SFA sold nonprogram foods, but did not determine compliance with nonprogram food requirements.			
Technical Assistance			
The SFA has not determined compliance with nonprogram food revenue requirements. The DPI NonProgram Food Revenue Tool should be completed every year. You can use a 5-day reference period to complete the tool. This tool should include adult/staff meals, a la carte, extra milks, and extra entrees as your nonprogram foods. If the tool shows you are out of compliance, you need to increase nonprogram food prices. A copy of the DPI tool and instructions can be found on the DPI financial website under "NonProgram Food Revenue": https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial			
For detailed regulation see: 210.14(f) Revenue from nonprogram foods.			
Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Watch the Nonprogram Foods Revenue Tool webinar (https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html) and provide a copy of the completed quiz questions.			
2. Submit a completed copy of the DPI NonProgram Food Revenue Tool. If the tool shows you are out of compliance, include a written statement explaining how nonprogram food prices will be increased to come into 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.			
4. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			

Finding #2: Meal Counting

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.

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 #3: Civil Rights

The SFA is using the incorrect civil rights statement. They are using an outdated version of the statement.

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 statement on all Program material.

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

4. Provide an example to show that the non-discrimination statement has been added. Ex: any letter to the household.			
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Finding #4: Professional Standards

The employees outside of the school nutrition program whose responsibilities include duties related to the operation of the school nutrition program did not receive training applicable to their duties related to the program.

Technical Assistance

During the review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that employees outside of the School Nutrition programs (whose responsibilities include duties related to the operation of the School Nutrition program) receive adequate training specific to the task they perform. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

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 names, length, and date of trainings that have been completed/planned to meet the required training applicable to their			

Finding #5 : Professional Standards

The SFA is not tracking training hours.

Technical Assistance

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 Guide to Professional Standards for School Nutrition Programs.

210.30(g) School food authority oversight.

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 track the hours of training completed by all School Nutrition staff.			
4. Provide a copy of the tracker that will be used by the SFA.			

Required Corrective Actions- Review Areas

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

CN Resource

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