



## Administrative Review Summary and Corrective Actions

SFA Name:	St. Ignatius School
SFA Code/ ID Number:	447351
Administrative Review Conducted on:	Friday, December 15, 2017

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

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.

Staff were friendly and helpful during the review. Thank you for your efforts!

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

Strongly recommend that at least one person review how to determine applications, direct certification and verification. Recommend watching webinars provided by Wisconsin DPI, reviewing the Eligibility Manual for School Meals, and attending training on these topics when available.

GOALS is a training program designed for specific positions. We strongly recommend that you sign up for the Food Service Director's training program. <https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills>

WEBCASTS provided by DPI

a. Verification- [https://media.dpi.wi.gov/school-nutrition/verification/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html)

b. Free/Reduced eligibility- [https://media.dpi.wi.gov/school-nutrition/getting-started-free\\_reduced-price-meal-eligibility/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/getting-started-free_reduced-price-meal-eligibility/story_html5.html)

c. Filling out the application- [https://media.dpi.wi.gov/school-nutrition/filling-out-household-application-for-eligibility/story\\_html5.html](https://media.dpi.wi.gov/school-nutrition/filling-out-household-application-for-eligibility/story_html5.html)

d. Direct Certification- <https://www.youtube.com/watch?v=yv0XFNO4lwY>

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- recipes are not standardized, and not all are in written standardized format. Items on your menu that need standardized recipes include:

- Chop Suey Casserole
- Chili
- Peanut Butter and Jelly Sandwich
- Ham Sandwich

Standardize your recipes so that true yields and portion sizes can be determined.

To be standardized recipes must include:

- All ingredients in recipe.
- Correct measures and specific weight/measure of each ingredient.
- Serving/portion size(s) for each age/grade group.
- The true yield made by recipe.
- Clear and complete preparations steps / directions.

It is acceptable to use USDA recipes, but any changes by the school need to be noted on the recipe so recipe results and portions are standardized. Items not used in a recipe need to be noted as such.

A sponsor must maintain manufacturer nutrient information and nutrition facts labels. Nutrition facts labels for some items were not available for review. A complete manufacturer label was not available for the cornbread muffin.

#### Resource Management - Financial Reporting

The SFA incorrectly reported financial information to DPI on their annual financial reports. The beginning balances input into the reports for SY 14-15, SY 15-16, and SY 16-17 did not match the ending balances of the previous years. The SFA corrected the reports during the review. In the future, the SFA should ensure that the beginning balance matches the ending balance of the previous year.

Verification- During the review the SFA was informed that the confirming official may not also be the determining official. The SFA should review the current Income Eligibility Manual for additional verification requirements. The SFA was also reminded that the hearing official may not be the determining, confirming, nor the verifying official. The SFA was also informed of how to determine error prone applications.

During the review the requirement of maintaining a medical statement on file for students with life-threatening allergies was discussed with the SFA. The SFA must maintain a medical statement on file. When a medical statement is provided the SFA is required to accommodate physical and mental disabilities which substantially limit one or more major life activities including severe food allergies that result in anaphylaxis.

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

Civil Rights- During the review the requirement for the correct and updated "And Justice for All" poster was discussed with the SFA.

Food Safety- 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.

Food Safety- All items in the dry storage room, refrigerators, and freezers must be dated when they are received.

Edit Checks- As a reminder, the monthly edit check is required for breakfast and lunch each month. Recommend using Wisconsin DPI's template which is available on their website and was provided to you post review.

CLAIMING ON DPI WEBSITE: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/claiming> [Download and use the "Monthly Edit Check Form"]

SFA Name: <i>St. Ignatius School</i>	Site(s) Selected for Review: 1 <i>St. Ignatius School</i>	NSLP Grade Group: K-8	SBP Grade Group: <input checked="" type="checkbox"/> N/A
SFA ID Number: 447351	2 <i>NA</i>	NSLP Grade Group:	SBP Grade Group: <input type="checkbox"/> N/A
Week of Menu Review: 11/6/17 - 11/10/17	3 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group: <input type="checkbox"/> N/A

**Menu Review Findings: Lunch**

**Site 1:**

1. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for meat/meat alternate. A meat/meat alternate was offered daily, however the weekly minimum requirement was not met.
2. For the week of menu review, 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.
3. 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.
4. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the dark green vegetable subgroup.
5. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the beans/legumes vegetable subgroup.

**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.			

**Required Corrective Actions- Menu Review**

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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 Site(s) Selected for Review: St. Ignatius School  
NA  
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: Verification			
The SFA did not complete verification.			
Technical Assistance			
During the review, completing verification was reviewed with the SFA. The SFA was informed that they must complete verification according to regulations and within the correct timeframe. The SFA should review the current Income Eligibility Manual for additional verification information. Review the DPI website for verification information and forms.			
<i>For detailed regulation see: CFR 245.6a(C)(1) General.</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. List the steps the SFA will take in order to complete verification.			
4. Submit copies of the letters sent to the household and any supporting document submitted from the household.			
5. Revise your verification report on the DPI website by 1/31/18.			
Finding #2: 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 most current civil rights statement to appear on all Program material was discussed with the SFA. The SFA must use the most current statement on all Program material. Per USDA requirements the new Non-discrimination statement must be on all program materials no later than September 30, 2016. The SFA was provided with the USDA link to the new non-discrimination statement. <http://www.fns.usda.gov/fns-nondiscrimination-statement>

*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 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.			

### Finding #3: Offer vs Serve

Offer versus Serve is not being implemented correctly.

#### Technical Assistance

During the review, the meal pattern requirements for Offer versus Serve were reviewed with the SFA. Requirements include that the SFA must offer the five food components specified in the meal pattern, and students must be allowed the option to deny two items, except that they must take at least a 1/2 cup of either the fruit or vegetable component or 1/2 cup combination of fruit and vegetable. Student may deny any component(s) of his/her choosing.

*For detailed regulation see: 210.10 (e) Offer versus serve.*

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 Offer vs Serve has been reviewed and that all meals counted for reimbursement will have the required components.			
4. Provide a statement of assurance that servers and cashiers will not require the students to take milk.			

### Finding #4: Professional Standards

The SFA is not tracking training hours.



### Technical Assistance

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. Recommend visiting Wisconsin DPI's website for an example tracker.

*For detailed regulation see: 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.			

### Finding #5: Civil Rights

The SFA did not provide the yearly civil rights training for the appropriate staff.

### Technical Assistance

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.

*For detailed regulation see: FNS Instruction 113-1 Section XI Training*

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. Train all staff in the missing required topics of civil rights.			
4. Provide a statement of assurance that all required topics will be covered in future civil rights trainings.			

### Finding #6: Meal Components and Quantities

Signage is not posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal for lunch.

### Technical Assistance

During the review, the importance of signage was discussed with the SFA. The SFA must ensure that signage is posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal. The signage should also include information for Offer vs Serve. Recommend visiting the Wisconsin DPI website.

*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 statement that meal signage has been posted.			

#### Finding #7: 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 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			

#### Finding #8: Food Safety

The SFA did not request two health inspections for each school year.

#### Technical Assistance

During the review, health inspections were discussed with the SFA. The SFA must request two health inspections for each site for each school year and must maintain documentation of this request.

*For detailed regulation see: 210.13(b) Food safety inspections.*

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 has requested two health inspections for the current school year and will annually request two			
4. Provide a copy of the inspection request.			

### Finding #9: Meal Counting and Claiming

The meal counting system as implemented is allowing for overt identification of students receiving free and reduced price benefits.

#### Technical Assistance

The implemented meal counting system is allowing for overt identification of students receiving free and reduced priced benefits. To be in compliance, the SFA must ensure that the meal counting system does not allow for overt identification. A child's eligibility status must not be disclosed at any point in the process of providing free or reduced price meal. The SFA acknowledged the finding and will implement needed changes immediately.

*For detailed regulation see: SP 45-2012: Preventing Overt Identification*

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 process and paperwork has been changed to prevent overt identification. In the statement describe the new process that has been implemented.			
4. Subit a copy of your revised roster template.			

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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