



Administrative Review Summary and Corrective Actions

SFA Name:	St. Charles School
SFA Code/ ID Number:	517415
Administrative Review Conducted on:	January 26,2018

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on January 26, 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 **3/27/18**. 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

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Commendations & Suggestions

All staff are very friendly and are providing a great variety of food for the students. They know most of the students by name and use their names while coming thru line serving line. The students seem to enjoy personal communication.

The atmosphere in the cafeteria is very relaxing for the students to enjoy their lunch.

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.

Resource Management - The SFA made multiple mistakes when filing their annual financial report to DPI. Total labor expenditures were not added correctly, and the SFA did not record two reimbursement checks in their ledger. The SFA needs to improve their internal controls. The bookkeeper should be completing monthly reconciliations between the bank and ledger balances, and the annual financial report's ending balance should equal the reconciled ending balance per the ledger. A second person should review the annual financial report, and compare to the SFA's internal accounting records. It is also suggested that the SFA creates a digital copy of their ledger, such as in an excel document, to make it easier to add up revenues and expenses at the end of the year, find mistakes, etc.

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.

It is strongly recommended that the SFA download the Income Eligibility Manual for School Meals and review the verification section. Recommend the SFA attend trainings or complete online training on verification requirements. The SFA should focus on, but not limited to, reviewing the timeline for verification, how to identify error prone applications, how to determine how many applications to verify, the what confirming official duties are, what the verifying official duties are, paperwork requirements, etc. Visit this website for training opportunities: <https://dpi.wi.gov/school-nutrition/training> . Visit this link for the eligibilty manual: <https://www.fns.usda.gov/2017-edition-eligibility-manual-school-meals> . Please use this tracker for verification: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/verification-forms.docx>

The SFA should use all verification letter templates provided by Wisconsin DPI moving forward.

SFA Name: <i>St. Charles School</i>	Site(s) Selected for Review: 1 <i>St. Charles School</i>	NSLP Grade Group: K-8	SBP Grade Group: <input checked="" type="checkbox"/> N/A
SFA ID Number: 517415	2 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group: <input type="checkbox"/> N/A
Week of Menu Review: 12/4/17 - 12/8/17	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 weekly requirement for grain. A grain was offered daily, however the weekly minimum requirement 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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Administrative Review Conducted: January 26,2018
 Site(s) Selected for Review: St. Charles School
N/A
N/A

Date Corrective Action Plan was provided to SFA: 2/27/2018

Due Date for Corrective Action Plan: 3/29/2018

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: Benefit Issuance			
The SFA does not have a procedure for extending free school meal eligibility to all children who are members of a household in which one person in that household is receiving SNAP, TANF, or FDPIR benefits, as the SFA is not making the required effort to the extent possible to identify additional children in these households.			
Technical Assistance			
During the review, documenting extended eligibility was discussed with the SFA. Per USDA the SFA must make and effort, to the extent possible, to identify additional children in the same household of those certified for assistance program benefits. The SFA must base extended eligibility on allowable records as outlined in USDA memo SP 25-2010. The SFA must maintain documentation for extended eligibility, the SFA may use a variety of methods to maintain this documentation. Some SFAs, write the name of the student that the benefits are extended to next to the student from the same household on the direct certification list. In this case the SFA should document the date added, the SFA representative's signature or initials with the name of the added student. Other SFAs maintain a consolidated list of students that have been extended eligibility, in this case the list includes: the name of the student, the name of the student that eligibility is extended through, and the date added. The list should have the name of the SFA representative that determined the extended eligibility.			
245.6(b)(7) 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 extend eligibility from one student to other household members only based on district records, a household application, or a parent's signed attestation.			

Finding #2: Verification			
There was no documentation on file to show that verification was completed.			
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. All paperwork regarding verification must be maintained on file. Visit this website for a paper copy of the verification collection report: https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification .			
CFR 245.6a(C)(1) General.			
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 detailed steps the SFA will take in order to complete verification.			
4. Submit the correct numbers that should be on the FNS-742 (Verification Collection Report) as of October 1, 2017. (You will NOT need to go online to alter the VCR online.)			

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.			
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.			
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Finding #4: Verification

The confirming official may not also be the determining official.

Technical Assistance

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.

For detailed regulation see: 245.6a(e)(1)(i) Confirmation

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 confirming official will not also be the determining official.			
4. Provide the person(s) by position(s) who will be the determining official for all applications, the confirming official for verification, and the verifying official.			

Finding #5: Civil Rights

The SFA is attempting to resolve complaints alleging discrimination within the FNS School Meal Programs.

Technical Assistance

During the review the process for receiving and processing complaints alleging discrimination was discussed with the SFA. The SFA should not attempt to resolve complaints in-house and should forward all complaints to the appropriate outside agency.

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.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a statement of assurance that all alleged civil rights complaints regarding the meal programs will not be handled			

Finding #6: 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.

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. Provide civil rights training to all appropriate staff.			
4. Provide a statement of assurance that civil rights training will be provided annually to all appropriate staff.			

Finding #7: Professional Standards

No individual has been designated as food service director and the required training hours have not been completed

Technical Assistance

To be in compliance, the SFA must assign someone as the director. The SFA must ensure that the School Nutrition Program Director completes the required amount of training annually. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

210.30(b) Minimum standards for program directors.

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 hours.			
4. Write a statement of assurance that the new director meets the hiring standards as set by USDA. Include what qualifications this person has.			

Finding #8: 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.			

Finding #9: Food Safety

The SFA did not have the most recent food safety inspection report posted in a publicly visible location.

Technical Assistance

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.

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 most recent food safety inspection is posted in a visible location.			

Finding #10: 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.

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			
4. Provide documentation justifying the limited exception(s) for the noncompliant food items that were identified during the review.			

Finding #11: 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 #12: Verification

The applications subject to verification were not properly selected in accordance with the standard sample used, as the SFA did not verify the correct number of applications.

Technical Assistance

During the review, verifying the correct number of applications was discussed with the SFA. The SFA must choose the number of applications to review in accord with the process outlined in the Eligibility Manual for School Meals, Chapter 4. The SFA should select error prone applications first.

245.6a(c)(3) Standard sample size.

Required SFA Response	SFA Response	CNR Internal Use	
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Required Corrective Actions- Review Areas

Required SFA Response	SFA Response	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 identify error prone applications.			

Finding #13: Resource Management

The SFA incorrectly reported financial information on the annual food service financial report to the State Agency.

Technical Assistance

The SFA should ensure that all financial information submitted to the State Agency as part of their annual food service financial report (AFR) is reported accurately. During the resource management review, the following mistakes were found on the financial report.

1. The ending balance for SY 15-16's AFR (-\$1,617.53) did not match the beginning balance for SY 16-17's AFR (\$10,079.41). The SFA was unable to explain the difference. The ending balance of one year should always roll over to the beginning balance of the following year.
2. The beginning balance for SY 16-17's AFR (\$10,079.41) did not match the SFA's bank balance as of July 1, 2016 (13,458.01). The ending balance for the AFR (\$5,015.94) did not match the SFA's bank balance as of June 30, 2017 (\$1,335.90). The SFA was unable to explain the difference. The SFA should be able to reconcile the cash balance to the reported balance on the AFR.
3. The SFA determined they did not add up labor expenditures correctly and did not include two reimbursements in revenue on their SY 15-16 AFR.

210.14(c) Financial assurances.

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Confirm you have read through the DPI instructions on completing the AFR. Instructions can be found under "Annual Food Service			
2. Submit a revised, corrected version of the food service financial report to the State Agency.			
3. Provide reports showing the ledger balance for June 30, 2016 and June 30, 2017. These should match the beginning and ending balances per the SY 16-17 AFR. If they do not, explain the difference.			
4. List the steps the SFA will take to more carefully monitor the reporting process to ensure accuracy on future financial reports.			

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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