



Administrative Review Summary and Corrective Actions

SFA Name:	Baldwin-Woodville School District
SFA Code/ ID Number:	550231
Administrative Review Conducted on:	Thursday, November 16, 2017

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on Thursday November 16, 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 **January 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.

Thank you,

CN Resource

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Administrative Review Technical Assistance Summary

SFA Name:	Baldwin-Woodville School District
SFA Code/ID Number:	550231
Administrative Review Conducted on:	Thursday, November 16, 2017

Commendations & Suggestions

SFA was well prepared. Had all documents needed. Very knowledgeable.

Staff was friendly to students. Worked with them on lunch account balances without making them feel bad.

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 - Labor Allocation

The SFA needs to maintain an updated time study to support the labor allocation for the 2 administrative workers. Prior to the review, the SFA did not have a recent time study to support the 40% and 9% allocations for administrative workers who spent part of their time working for the food service program. During the review, the SFA was able to provide time sheets that verified these percentages. DPI does not allow indirect costs to be charged to the food service account, so the SFA must maintain documentation showing the direct benefit the food service program receives from expenses charged to the food service account. Time sheets are the preferable method for allocating employee salaries across multiple cost centers, but an annual time study will suffice.

Resource Management - Paid Lunch Equity Tool

The SFA made an error on their Paid Lunch Equity Tool for SY 17-18. The "Price 2" on the Unrounded Requirement Finder tab did not match the price input into Step 1. A revised copy of the tool was sent to the SFA, along with additional technical assistance. Next year the SFA should input \$2.08 into Step 1 of the SY 18-19 PLE Tool. Alternately, the SFA could input \$1.57 into the SY 10-11 price box on the Unrounded Requirement Finder tab, and copy and paste the "Price 2" into Step 1. Either method should result in the same price being input into Step 1.

Resource Management - Adult Meals

The SFA misreported the adult breakfast price in their DPI contract for SY 17-18. The SFA reported a price of \$2.40, but actually charges \$2.25. They corrected their contract to reflect the correct price, so no further action is necessary. The SFA should be more careful when reporting meal prices on their DPI contract, to ensure that DPI receives accurate pricing information for both adults and students.

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.

Professional standards tracker- recommend adding a column to have total hours added up automatically.

SFA Name: Baldwin-Woodville School District
 SFA ID Number: 550231
 Week of Menu Review: 10/2/17 - 10/6/17

Site(s) Selected for Review:			
1	Baldwin High School	NSLP Grade Group: 9-12	SBP Grade Group: 9-12 <input type="checkbox"/> N/A
2	N/A	NSLP Grade Group:	SBP Grade Group: <input type="checkbox"/> N/A
3	N/A	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 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.

2. For the week of menu review, the lunch menu did not meet the minimum daily requirement for grain. A grain 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.

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: Baldwin-Woodville School District
 SFA Code/ID: 550231

Administrative Review Conducted: Thursday, November 16, 2017
 Site(s) Selected for Review: Baldwin High School
N/A
N/A

Date Corrective Action Plan was provided to SFA: 12/14/2017

Due Date for Corrective Action Plan: 1/14/2018

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: Resource Management			
The SFA sold nonprogram foods, but did not correctly determine compliance with nonprogram food requirements.			
Technical Assistance			
The SFA submitted the USDA NonProgram Food Revenue Tool for SY 16-17, but it was completed incorrectly. The SFA did not include federal and state aid in "Total Revenue," did not include adult lunch revenue in "NonProgram Food Revenue," and included adult meal food costs in "Cost for Reimbursable Meal Food" instead of "Cost for NonProgram Food." It is highly suggested that the SFA recalculates compliance for the current school year using the DPI tool. This tool can be completed using a 5-day reference period, which makes it easier to separate adult meal costs from reimbursable meal costs. This tool should include adult/staff meals, a la carte, extra milks, and extra entrees as your nonprogram foods. Catering does not need to be included. 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 corrected copy of the 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: Civil Rights

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

Technical Assistance 113-1 Section XV Complaint Procedures

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.			
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 #3: 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.

For detailed regulation see: 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 internally and that the complaints will be forwarded to the appropriate agency.			

Finding #4: 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.			

Finding #5: Meal Counting and Claiming

The SFA is not claiming meals served during field trips properly because the count is not taken at the point of service

Technical Assistance

During the review, claiming meals during field trips was discussed with the SFA. The SFA is not claiming meals served during field trips properly because the count is not taken at the point of service. To be in compliance, the SFA must ensure that meals served during field trips are claimed based on accurate counts taken at the point of service. The SFA acknowledged the finding and will implement needed changes immediately.

For detailed regulation see: 210.7(c)(1) Lunch count system.

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 #6: Certification and Benefit Issuance

The SFA annualized income when it should have been determined at its stated frequency.

Technical Assistance

During the review, making determinations based on the stated frequency was discussed with the SFA. When determining eligibility, the SFA may not annualize income unless income sources are listed at different frequencies. If there are multiple income sources with more than one frequency, the LEA must annualize, that is, calculate all income as for an entire year, by multiplying: Weekly income by 52; or Bi-weekly income (received every two weeks) by 26; or Semi-monthly income (received twice a month) by 24; or Monthly income by 12.

For detailed regulation see: 245.6(c)(4) 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 income will not be annualized when it should be determined at its stated frequency (monthly, weekly, bi weekly, or 2 x per mo.)			

Finding #7: Verification

The SFA annualized income when it should have been determined at its stated frequency.

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.			

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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