



## Administrative Review Summary and Corrective Actions

SFA Name:	St. Anne's School
SFA Code/ ID Number:	557369
Administrative Review Conducted on:	Friday, November 17, 2017

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on 11/17/2017; 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 15, 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:	St. Anne's School
SFA Code/ID Number:	557369
Administrative Review Conducted on:	Friday, November 17, 2017

### Commendations & Suggestions

The variety of different vegetables offered to the students was great to see. The students filling their trays with the healthy options.

The Food Service Managers records were well kept and easily attained.

The Kitchen was well organized.

### 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 - Paid Lunch Equity Tool**

The SFA incorrectly completed the Paid Lunch Equity Tool for SY 17-18. The SFA included adult meals on the Price Calculator tab, and input the incorrect SY 10-11 paid lunch price on the Unrounded Requirement Finder tab. Adult meals should not be included on the tool, as they are not program paid meals. Additional technical assistance was sent to the SFA via email, along with a copy of the revised tool. The SFA submitted the corrected tool to DPI as requested.

**Resource Management - Paid Lunch Price**

The SFA reported the incorrect paid lunch price in their DPI contract. The SFA listed a price of \$2.75, but actually increased prices to \$3.00. They corrected the contract during the review, but should ensure they are more careful when reporting prices to DPI in the future.

**Edit Checks -** During the review, edit checks were discussed with the SFA. To be in compliance, the SFA must ensure that edit checks are completed daily. How to complete edit checks to ensure meal counts do not exceed attendance adjusted eligible and/or total enrollment was reviewed with the SFA. The SFA was shown the DPI manual edit check to be able to use daily and for preparing the claim. It will simplify their current method.

**Civil Rights -** Technical assistance was provided to the SFA to keep a copy of the USDA Non-Discrimination Complaint Form on file should they ever need to use it.

**Local 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 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.

SFA Name: <i>St. Anne's School</i>	Site(s) Selected for Review: 1 <i>St. Anne's School</i>	NSLP Grade Group: K-5, K-8	SBP Grade Group: <input checked="" type="checkbox"/> N/A
SFA ID Number: 557369	2 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group: <input type="checkbox"/> N/A
Week of Menu Review: 10/9/17 - 10/13/17	3 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group: <input type="checkbox"/> N/A

**Menu Review Findings: Lunch**

**Site 1:**  
 Grades 5-8: 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.  
 Grades K-4: 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 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.

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 SFA Code/ID: 557369

Administrative Review Conducted: Friday, November 17, 2017  
 Site(s) Selected for Review: St. Anne's School  
N/A  
N/A

Date Corrective Action Plan was provided to SFA: 12/15/2017

Due Date for Corrective Action Plan: 1/15/2018

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": <a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial">https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial</a>			
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 ( <a href="https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html">https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html</a> ) 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: Resource Management**

The SFA's adult meal price is not in compliance with FNS Instruction 782-5, Rev. 1.

**Technical Assistance**

The SFA has priced their adult meals below the cost of producing these meals. Adult meals should be priced at least at the student price plus per-meal reimbursements and the value of commodities received. In the current year, the SFA priced adult lunches at \$3.50, but should have charged at least \$3.65 (\$3.00 student price + \$.37 federal reimbursement + \$.2325 value of commodities + \$.0482 state reimbursement). The DPI Adult Meal Memo was sent to the SFA in an email. This memo, along with updated reimbursement rates and the value of commodities can be found on DPI's Financial Management website: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>

*For detailed regulation see: FNS Instruction 782-5, Rev. 1*

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. This should include documentation showing the new adult meal price.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a written statement outlining the SFA's adult meal pricing policy. This policy should establish guidelines for an annual reassessment of adult meal prices in line with FNS Instruction 782-5.			
4. Revise the adult meal price in your DPI contract.			

### Finding #3: 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 #4: Local School Wellness Policy

The SFAs Local Wellness Policy does not contain all of the required components.

#### Technical Assistance

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. <http://www.fns.usda.gov/tn/local-school-wellness-policy>

*For detailed regulation see: 210.31 Local school wellness policy*

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 completed Local Wellness Policy.			
4. If the SFA needs more time to finish the Local Wellness Policy, provide a timeline for when parts of the plan will be completed.			



### Finding #5: Summer Food Service Program 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.			

### 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.)			
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**Finding #7:**

Meal count totals by category have not been combined or recorded correctly. This is a non-systematic error. The SFA uses 2 different counting methods. 1 in cafeteria, 1 in office. The SFA did not compare the counts correctly and underclaimed by 1 free meal and overclaimed by 2 paid meals.

**Technical Assistance**

During the review, accurate meal counts were discussed with the SFA. Meal count totals by category have not been combined or recorded correctly. This is a non-systematic error. To be in compliance, the SFA must ensure that meal counts are being recorded accurately. Consolidating meal counts by category was reviewed with the SFA. 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 explains the new/revised process that will be implemented to ensure that meal counts are correctly combined and recorded for the claim for reimbursement.			

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.



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