

### Administrative Review Summary and Corrective Actions

SFA Name:	Bonduel School District	
SFA Code/ ID Number:	580602	
Administrative Review Conducted on:	November 28,2017	

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on November 28,2017 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 5, 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

**Bonduel School District** 

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SFA Code/ID Number:	580602	
Administrative Review Conducted on:	November 28,2017	
Commenc	dations & Suggestions	
Thank you for completing the Paid Lunch Equity Tool eac	ch year and adhering to the pricing requirements for both paid	
student lunches and adult meals.		

Food Service staff very helpful and accommodating to students.

The variety of fruits and vegetables that the Food Service staff provided for the students was very appealing.

## 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 Prices

SFA Name:

The SFA reported the incorrect paid lunch prices on their SY 16-17 DPI contract. The SFA listed paid lunch prices of \$2.70 and \$2.95, but the SFA actually charged \$2.95 & \$3.15. The SFA should correct the contract, and ensure they are more careful when reporting prices to DPI in the future. The current year's contract has the correct prices listed.

SFA was provided guidance on where to find the USDA civil rights complaint form online.

The SFA was reminded that all snacks served a la carte should be run through the Smart Snack Calculator and a copy sould be maintained on file.



SFA Name:	Site(s) Selected for Review:			
Bonduel School District	1 Bonduel Middle School	NSLP Grade Group: 6-8	SBP Grade Group: 6-8	□ N/A
SFA ID Number:	2 N/A	NSLP Grade Group:	SBP Grade Group:	N/A
580602	3 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	□ N/A
Week of Menu Review:				
10/2/17 - 10/6/17				

# 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, the lunch menu did not meet the minimum grain requirements. The minimum portion size was not met and 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.

#### **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 CNR Internal Use **Required Criteria for Response to Findings SFA Response** 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.



Required Corrective Actions- Menu Review				
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.		i		

### Menu Review Findings: Breakfast

For the week of menu review, the breakfast menu did not meet the minimum grain requirements. The minimum portion size was not met and 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 **CNR Internal** Required Criteria for Response to Findings **SFA Response** 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:	Bonduel School District		Administrative Review Condu	ucted: Nove	mber 28,2017
SFA Code/ID:	580602		Site(s) Selected for Review:	Bonduel Mid	dle School
				N/A	4
				N/A	1
Date Corrective Action	Plan was provided to SFA:	1/5/2018	Due Date for Corre	ective Action Plan:	<u>2/5/2018</u>

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 Appy. In		rnal Use 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.		Αρρν.	mus.	
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.				



## Finding #2: Benefit Issuance

Not all selected applications were approved correctly. Not all applications included the names of all household members.

#### **Technical Assistance**

Complete applications must include the appropriate documentation. 245.2 Documentation means: (1) The completion of a free and reduced price school meal or free milk application which includes: (I) For households applying on the basis of income and household size, names of all household members; income received by each household member, identified by source of the income (such as earnings, wages, welfare, pensions, support payments, unemployment compensation, and social security and other cash income); the signature of an adult household member; and the last four digits of the social security number of the adult household member who signs the application or an indication that the adult does not possess a social security number.

Eligibility Manual, Chapter 3: Establishing Eligibility CNR Internal Use Required SFA Response **SFA Response** Appv. Intel's 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 staff approving applications understand the requirements. 4. Describe how all applications will be determined correctly moving forward. 5. Provide copies of each of the corrected applications, with the date corrected indicated, and letters to the household(s) if there is a change in eligibility status.

Finding #3: 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 ensure that the School Nutrition staff complete the required amount of training annually. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs. Wisconsin DPI has a tracker available online as does USDA.

For detailed regulation see: 210.30(d) Continuing education/training standards for all staff			
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. Submit a copy of the completed training tracker for all food service			
employees.			

# Finding #3:

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 CNR Internal Use 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. Train all appropriate staff involved with the food service operation. 4. Provide a statement of assurance that civil rights training will be provided annually to all appropriate staff

Check the confirmation check box, sign and date the form (typing in your signature is acceptable) and upload the signed copy to chrsupport.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
P.O. Box 31060
Mesa, AZ 85275
866-941-6368
adminreview@cnresource.com

