



Administrative Review Summary and Corrective Actions

SFA Name:	St. Paul Lutheran School
SFA Code/ ID Number:	587850
Administrative Review Conducted on:	November 29, 2017

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on November 29, 2017 at an exit conference summarizing the findings that 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 28, 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

Outstanding job meeting all of the requirements for the meal pattern. All daily and weekly meal component and food quantity requirements were met for the week of menu review.

Food Service staff is very friendly they have a great they have a great repour with the students.

The office staff is knowledgeable and very detailed in there record keeping of the lunch program.

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

Resource Management - Paid Lunch Equity Tool

The SFA made an error on their Paid Lunch Equity Tool. The SFA included reduced meals on the price calculator. Only paid

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>

During the on-site review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to be reviewed and updated on a periodic basis to ensure that the policy reflects current requirements and SFA practices.

During the review, correctly identifying error-prone applications and ensuring the software is using the correct Income Eligibility Guidelines was discussed with the SFA. The SFA must identify error-prone applications in accord with the process outlined in the Eligibility Manual for School Meals, Chapter 4.

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Administrative Review Conducted: November 29,2017
 Site(s) Selected for Review: 0
0
0

Date Corrective Action Plan was provided to SFA: 12/28/2017

Due Date for Corrective Action Plan: 1/28/2017

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 charged unallowable costs to the food service account.						
Technical Assistance						
Expenses charged to the food service account must be necessary, reasonable and allocable. During the review, it was determined that the SFA charged unallowable costs to the food service program (see list below). The SFA is responsible for ensuring no unallowable purchases are made using food service funds, and should have internal controls in place to prevent such unallowable costs from occurring. Examples of internal controls include staff training on allowable costs, developing written policies & procedures so only trained, authorized personnel can approve food service expenses, and segregation of duties. An extensive list of allowable and unallowable costs can be found in 2 CFR Part 200, Subpart E. DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50. For both public and private schools in Wisconsin, any overhead costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate.						
<p>(1) The SFA charged \$5.00 per operating day to the food service account for water, electricity, and gas, but did not have the documentation to substantiate this allocation. Although the cost is reasonable and necessary, the cost must also be allocable. Costs must be assigned to cost objectives based on the benefit received (DPI does not allow indirect costing). This could be done through a separate meter for the kitchen utilities, or a current usage study. The SFA will need to provide this documentation as part of their corrective action response, or the cost will be considered unallowable due to it not being allocable. The total utility expense charged to Fund 50 for SY 16-17 was \$850.00. Since the SFA's general fund transfer exceeded this amount, the SFA will not need to transfer additional funds to cover the reimbursement of the unallowable cost. They will need to provide assurance that this expense will not be charged to food service in the future. (2) The SFA charged hourly rates for teachers, administrative staff and the janitor based on monthly time estimations. 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.</p>						
<i>For detailed regulation see: 210.14(a) Nonprofit school food service.</i>						
Required SFA Response	SFA Response	<table border="1"> <tr> <td colspan="2" style="font-size: small;">CNR Internal Use</td> </tr> <tr> <td style="font-size: x-small;">Appv.</td> <td style="font-size: x-small;">Intls.</td> </tr> </table>	CNR Internal Use		Appv.	Intls.
CNR Internal Use						
Appv.	Intls.					

<p>1. Provide written assurance that the food service account will not be charged any unallowable costs charged in the current or future school years. If the SFA has new documentation to support all or a portion of the utility expenses as allowable to the food service account, the SFA may provide this documentation. Examples include usage studies, or other calculations/documents showing that the expenses were reasonable, necessary, and allocable to the food service program.</p>			
<p>2. Provide written assurance that going forward the SFA will 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.</p>			
<p>3. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance in the future.</p>			

Finding #2: Professional Training			
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.			
<i>210.30(g) School food authority oversight.</i>			
Required SFA Response	SFA Response	CNR Internal Use	
1. Provide the date that the finding was brought into compliance or the planned date of completion.		Appv.	Intls.
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 #3: Civil Right			
The SFA must use the current civil rights statement on all Program materials. The SFA is not using the civil rights statement on all Program materials.			
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			
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.			
3. Provide a written statement that the non-discrimination statement has been added to all nutrition program materials.			

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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