



Administrative Review Summary and Corrective Actions

SFA Name:	Lutheran Social Services WI and Up, Inc.
SFA Code/ ID Number:	589129
Administrative Review Conducted on:	December 12,2017

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on December 12, 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 22, 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

SFA Name:	Lutheran Social Services WI and Up, Inc.
SFA Code/ID Number:	589129
Administrative Review Conducted on:	December 12,2017

Commendations & Suggestions

The SFA was organized and well prepared for the review.

The SFA had a great variety of fruits and vegetables for breakfast and lunch for the students.

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.

Menu Review- for clarity on the production records, consider entering the serving size of the meat/meat alternate in the serving size column, not the oz. eq. meat/meat alternate in the serving size column. For example, with the pulled pork on Tuesday, enter a 4 oz. serving size of pulled pork in the serving size column and 2 oz. eq meat/meat alternate in the component contribution column.

Resource Management - Labor Allocation

The SFA does not need to remove the labor expenses allocated for student dinners from the food service account. All food service labor expenses can be recorded on the DPI food service financial report. The labor allocation for student dinners (and adult meals) can be recorded on the Nonprogram Foods row.

Resource Management - NonProgram Meals

The SFA must ensure sufficient non-federal funds are transferred into the food service account to pay for non-program foods. This includes student dinners, free adult meals, and any other non-reimbursable foods purchased by the food service program. Every year, the SFA should calculate the cost of student dinners and other non-program foods, and report this amount in the "Transfer from Non-Food Service Account-Non-Program Food Revenue" column on the DPI annual financial report. To calculate student dinner costs, the SFA should take the number of dinners served and multiply by the average cost per meal (including food and labor).

Food Safety Plan - technical assistance was provided regarding the required sections of the food safety plan including menu items grouped according to the process categories.

Wellness Policy - technical assistance was required regarding the assessment of the wellness policy. The policy should be assessed on at least triennially. Documentation of the assessment must kept on file and made available to the public. Recommend keeping the assessment in the same folder as the wellness policy.

SFA Name: <i>Lutheran Social Services WI and Up, Inc.</i>	Site(s) Selected for Review: 1 <i>Visions Jr. Sr. High School</i>	NSLP Grade Group: 9-12	SBP Grade Group: 9-12	<input type="checkbox"/> N/A
SFA ID Number: 589129	2 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
Week of Menu Review: 11/6/17 - 11/12/17	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 daily and weekly requirements for grain. A grain was offered daily, however the minimum daily and weekly requirements were 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.			

Menu Review Findings: Breakfast			
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.			
<i>For detailed regulations see: 7 CFR 220.10</i>			
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: Lutheran Social Services WI and Up, Inc.
 SFA Code/ID: 589129

Administrative Review Conducted: December 12,2017
 Site(s) Selected for Review: Visions Jr. Sr. High School
N/A
N/A

Date Corrective Action Plan was provided to SFA: 1/22/2018

Due Date for Corrective Action Plan: 2/22/2018

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:Civil Rights			
The SFA did not include the current civil rights statement on the posted menu as required.			
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.			
4. Provide an example to show that the non-discrimination statement has been added to the menu.			

Finding #3: 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. The SFA also misreported adult meal prices in their DPI contract. Adult meals should be priced at least at the per-meal reimbursements and the value of commodities received. In the current year, the SFA priced adult lunches at \$3.00, but should have charged at least \$3.65 (\$3.31 federal reimbursement + \$.2325 value of commodities + \$.0482 state reimbursement). The SFA reported an adult lunch price of \$4.50 for the current year, which does not match what they are currently charging or what they should be charging.

Additionally, the SFA served free meals to "lunch duty" staff. Only food service employees may eat for free at the cost of the food service program. Any other staff members, visiting adults, or "lunch duty" staff must pay for the full cost of their meal, as outlined in FNS Instruction 782-5. If they will not be charged directly, the SFA must transfer sufficient non-federal funds to pay for these nonprogram meals. The amount needed to pay for these free adult meals should be reported under the "Transfer from Non-Food Service Account-Non-Program Food Revenue" column on the DPI annual financial report.

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 adult meal price was brought into compliance or the planned date of completion. This should include documentation showing the new adult meal price.			
2. Provide written assurance that you will report sufficient non-federal funds to pay for the free non-program adult meals in the "Transfer from Non-Food Service Account-Non-Program Food Revenue" column on the DPI annual financial report.			
3. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
4. 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. If non-federal funds will be used to pay for free adult meals, explain how you will ensure sufficient funds are transferred into the food service account. This should include tracking the number of free adult meals served and the rate at which the food service account will be reimbursed.			
5. Revise the adult meal price in your DPI contract.			

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

CN Resource

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