



### Administrative Review Summary and Corrective Actions

SFA Name:	Shell Lake School District
SFA Code/ ID Number:	655306
Administrative Review Conducted on:	Wednesday, November 15, 2017

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on November 15, 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 12, 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:	Shell Lake School District
SFA Code/ID Number:	655306
Administrative Review Conducted on:	Wednesday, November 15, 2017

Commendations & Suggestions
Outstanding job meeting all of the requirements for breakfast. All daily and weekly meal component and food quantity requirements were met for the week of menu review, for the breakfast menu.
Great job meeting the whole grain-rich requirement for the week of menu review.
Thank you for you kind accommodations and preparations for the review. It was a pleasure to work with you. Your willingness to make the necessary adjustments to your program is appreciated.
The staff members were friendly and efficient and the students seemed to really enjoy their food.

Other areas of Technical Assistance (Does NOT require SFA Response)
Menu Review- technical assistance was provided in an email to the SFA with the lunch menu review results. Suggestions were provided to bring the menus into compliance.
Snack Meal Counts - Snack meal counts were incorrect for the individual sites, however the total number of snacks claimed for the district was correct. The error was due to problems with the rollover at the beginning of the school year. Technical assisatance provided to review snack number, per site, prior to submitting the claim.

SFA Name:	Site(s) Selected for Review:	NSLP Grade Group: K-8	SBP Grade Group: K-8
<u>Shell Lake School Distri</u>	<u>1 Shell Lake Elementary</u>		
SFA ID Number:	2 N/A	NSLP Grade Group:	SBP Grade Group:
<u>655306</u>	<u>3 N/A</u>		
Week of Menu Review:		NSLP Grade Group:	SBP Grade Group:
<u>10/2/17 - 10/6/17</u>			

**Menu Review Findings: Lunch**

**Site 1:**  
 For the week of menu review, the weekly grain based dessert requirement was not met for lunch. No more than 2 ounce equivalents of grain based desserts may be offered weekly.

**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			
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			
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			
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SFA Name: Shell Lake School District  
 SFA Code/ID: 655306

Administrative Review Conducted: Wednesday, November 15, 2017  
 Site(s) Selected for Review: Elementary School  
N/A  
N/A

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

Due Date for Corrective Action Plan: 1/12/2018

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 Paid Lunch Equity			
The PLE tool was run incorrectly and the lunch price(s) is/are not meeting the Paid Lunch Equity regulation.			
Technical Assistance			
The SFA did not increase paid lunch prices as required by paid lunch equity requirements (due to errors when calculating the Paid Lunch Equity Tool), and did not transfer sufficient non-federal funds into the food service account to make up for this paid lunch price deficiency. The SFA input the incorrect October 2016 prices on the Price Calculator tab, so the tool incorrectly applied the \$.10 cap to a lower average price, showing the SFA only needed to charge \$2.51. The SFA's actual requirement price after the correct \$.10 cap is applied is \$2.64. A corrected version of the tool was sent to the SFA with additional technical assistance. The SFA should have raised prices by \$.10 for the current year. The SFA should ensure the Paid Lunch Equity Tool is correctly completed annually, and if the tool shows a paid lunch price increase is necessary, the SFA must raise the weighted average paid lunch price as required (no more than \$.10 per year is required). If the SFA chooses to not raise paid lunch prices as required, they must complete the NonFederal Calculator tab of the Paid Lunch Equity Tool to determine how much non-federal funds is required to make up for the price deficiency.			
<i>For detailed regulation see: 210.14(e) Pricing paid lunches.</i>			
Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide documentation showing that paid lunch prices have been increased as necessary, or that sufficient nonfederal funds have been transferred into the food service account. If prices will not be increased until a later date (such as the beginning of the next semester or school year), provide written assurance that the new paid lunch prices will reflect the requirement price calculated using the Paid Lunch Equity Tool and the date that the new price(s) will be implemented.			

2. Upload the corrected PLE tool to the contract, update the student lunch price(s) on the contract (if prices have been increased), and submit for approval. Provide a statement saying this has been completed.			
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**Finding #2: Resource Management Non-Program Revenue**

The SFA has not sufficiently priced its nonprogram foods to be in compliance with revenue from nonprogram food requirements.

**Technical Assistance**

The SFA's NonProgram Food Revenue Tool showed that the SFA required additional nonprogram revenue to be in compliance. The SFA did not price its nonprogram foods at a sufficient rate to ensure its revenue ratio equaled or exceeded its food cost ratio. The tool showed an additional \$24 revenue from nonprogram foods was needed for the 5-day reference week, which comes to \$864 additional revenue for the year. The SFA can either raise nonprogram food prices or make a nonfederal fund transfer for \$864 to supplement nonprogram food prices for the year. Suggested price increases would be to increase extra milk prices by \$.10, propel prices by \$.25, and/or extra entree prices by \$.10.

Additionally, the SFA did not include adult meals in the nonprogram food section of the DPI tool. The reviewer was able to fill in this information with point of sale information the SFA provided, and a corrected version of the tool was sent to the SFA. The numbers listed above reflect the corrected tool. The SFA needs to view the Nonprogram Foods Revenue Tool webinar on the DPI website, to help ensure mistakes are not made when completing the tool in the future.

*For detailed regulation see: 210.14(f) Revenue from nonprogram foods.*

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. List the steps the SFA will take to increase nonprogram food revenues. This should include the specific price increases and the date the increases will take effect. If a nonfederal fund transfer will be made in lieu of raising prices, the SFA should provide documentation showing the transfer into Fund 50 occurred.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. 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.			

**Finding #3: Certification and Benefits Issuance**

Not all selected applications were approved correctly. The SFA approved two applications that were missing accurate FDPIR case numbers. In addition, an application was incorrectly determined based on family size.

**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:(ii) For a child who is receiving assistance under SNAP, FDPIR or TANF, as defined in this section, the child's name and appropriate SNAP or TANF case number or FDPIR case number or other FDPIR identifier and signature of an adult household member.

*For detailed regulation see: Eligibility Manual, Chapter 2: The Basis of Eligibility*

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 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			

#### Finding #4: Certification and Benefit Issuance Denial of Benefits

Household notification of denied benefits is not consistent with FNS requirements, as it does not contain the required information.

#### Technical Assistance

During the review, household notification of denied benefits was discussed with the SFA. The SFA must notify the household of denied benefits in writing, the notification must be provided within 10 days of receipt of a completed application. At a minimum the notification letter must include The reason for the denial of benefits, e.g. income in excess of allowable limits or incomplete application, notification of the right to appeal, instructions on how to appeal, and a statement reminding parents that they may reapply for free or reduced price benefits at any time during the school year. For additional information on the notification letter the SFA should review the Eligibility Manual for School Meals, Chapter 3.

*For detailed regulation see: 245.6(c)(6) 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 revised letter to the household for denied benefits that contains all of the required information.			

#### Finding #5: Certification and Benefit Issuance Household Notification Letters

Household notification of benefits and direct certification has an outdated non-discrimination statement.

#### 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>

*For detailed regulation see: 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.			
4. Provide an example to show that the non-discrimination statement has been added. Ex: any letter to the household.			

#### Finding #6: Civil Right Complaint Procedure

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

#### Technical Assistance

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 #7: Meal Counting and Claiming

The SFA and SA claims do not match. The SFA has a non-systematic claiming error.

#### Technical Assistance

During the review, claiming was discussed with the SFA. The SFA and State Agency claims do not match. The SFA has a non-systemic claiming error. To be in compliance, the SFA must ensure that claims are being filed accurately. The SFA must correctly consolidate the claim based on the edit checks from each site. 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
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**Required Corrective Actions- Review Areas**

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. Provide a statement explaining the error that led to the incorrect claims.			
4. Provide a process that will be implemented to ensure that all claims submitted for reimbursement are accurate.			

**Finding #8: On-Site Monitoring**

On-site monitoring was not completed for all or some of the sites within the SFA for breakfast and lunch for the previous school year. The review took place before the February 1st deadline of the current school year.

**Technical Assistance**

During the review, the requirement for on-site monitoring was reviewed with the SFA. It was determined that the SFA is not completing on-site monitoring for all or some of the sites within the SFA. Since the SFA has multiple sites, they are required to monitor the lunch counting and claiming system for each site in the SFA prior to February 1st of each year. The SFA was provided with the link to the USDA memo that includes a sample monitoring form. If the SFA chooses to create their own monitoring form, at a minimum it must include all information that is on the USDA monitoring form. <https://fns-prod.azureedge.net/sites/default/files/cn/SP56-2016os.pdf>

*For detailed regulation see: 210.8(a)(1) On-site reviews and 220.11(d)(1)On-site reviews*

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 all on-site monitoring will be completed for all sites by February 1, each year moving forward.			
4. Provide the on-site monitoring forms that have been completed for the current school year.			

**Finding #9: Wellness Policy**

The SFA does not have a Local School Wellness Policy.

**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>

<i>For detailed regulation see: 210.31 Local school wellness policy</i>			
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 #10: Afterschool Snack Program

The program is not monitored twice per year, including once within the first four weeks of operation.

#### Technical Assistance

During the review, program monitoring was discussed with the SFA. The SFA must monitor the program twice per year. Once within the first four weeks of operation and once before the end of the program.

*For detailed regulation see: 210.9(c) Afterschool care requirements.*

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 must monitor the Afterschool Snack Program twice per year, and once within the first 4 weeks of operation.			
4. The SFA must also complete the monitoring reviews and submit them or, if early in the year, must provide the date when monitoring will occur.			

### Finding #11: Afterschool Snack Program

The meal service operation was not in compliance with all program requirements. The purpose of the program is for the purpose of care and supervision of children, however there were several things going on and it was unclear if the programs met program requirements.

#### Technical Assistance

During the review, the requirement that the snack meal service be for the purpose of care and supervision of children was discussed with the SFA. The Afterschool Care Snack Program may not be for the purpose of extracurricular programs organized primarily for scholastic, cultural, or athletic programs, but must include educational and/or enrichment activities. Snacks should not be provided to students who are getting on the bus to go home.

**Required Corrective Actions- Review Areas**

<i>For detailed regulation see: 210.2 Afterschool care program</i>			
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 Afterschool Care Snack Program may not be for the purpose of extracurricular programs organized primarily for scholastic, cultural, or athletic programs, but must include defined educational and/or enrichment activities.			

**Finding #12: Verification**

Not all applications selected for review were verified correctly. The SFA did not determine the correct eligibility based on household income and size.

**Technical Assistance**

During the review, properly determining the correct eligibility, based on household income and size, was discussed with the SFA. To determine eligibility, the SFA must follow the procedures for processing applications and submitted eligibility documents as outlined in the Eligibility Manual for School Meals, Chapter 3, as well as the procedures for verifying applications as outlined in Chapter 4.

*For detailed regulation see: Eligibility Manual Chapter 2A*

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 determine applications selected for verification based on the total household			
4. Submit a copy of the letter sent to the family notifying them of the change in eligibility as corrective action.			

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.