



Administrative Review Summary and Corrective Actions

SFA Name:	Weyauwega-Fremont School District
SFA Code/ ID Number:	686384
Administrative Review Conducted on:	Thursday, December 14, 2017

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on 12/14/2017; 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:	Weyauwega-Fremont School District
SFA Code/ID Number:	686384
Administrative Review Conducted on:	Thursday, December 14, 2017

Commendations & Suggestions

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

Thank you for completing the Paid Lunch Equity Tool each year and adhering to the pricing requirements for both paid student lunches and adult meals.

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

Recommend that the new food service director review the Wisconsin DPI website in detail and attend/view trainings and webinars as she can. <https://dpi.wi.gov/school-nutrition/training>

GOALS is a training program designed for specific positions. We recommend that you sign up for the Food Service Director's training program. <https://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills>

WEBCASTS provided by DPI

- a. Verification- https://media.dpi.wi.gov/school-nutrition/verification/story_html5.html
- b. Free/Reduced eligibility- https://media.dpi.wi.gov/school-nutrition/getting-started-free_reduced-price-meal-eligibility/story_html5.html
- c. Filling out the application- https://media.dpi.wi.gov/school-nutrition/filling-out-household-application-for-eligibility/story_html5.html
- d. Direct Certification- <https://www.youtube.com/watch?v=yv0XFNO4lwY>

Menu Review- recipes are not all standardized, and not all are in written standardized format. Items on your menu that need standardized recipes include:

- Bread
- Chicken Noodle Soup
- Muffins

Standardize your recipes so that true yields and portion sizes can be determined. To be standardized recipes must include:

- All ingredients in recipe.
- Correct measures and specific weight/measure of each ingredient.
- Serving/portion size(s) for each age/grade group.
- The true yield made by recipe.
- Clear and complete preparations steps / directions.

On Tuesday, the production record lists 2 oz. of cheese served with a 2oz. eq. meat/meat alternate credit. It was indicated that this is served in a 2 oz. volume measuring cup. This is equivalent to 1/8 cup which will credit as .5 oz. eq. meat/meat alternate. The taco meat also served this day should list a portion size of 3.17 oz. on the production record which is a 2 oz. eq. meat/meat alternate serving.

On Wednesday, the production record indicates 2 oz. of BBQ is served with a 2 oz. eq. meat/meat alternate credit. It was indicated that this is portioned with a #16 scoop. According to the manufacturer JTM, to reach a 2 oz. eq. serving, you will need to use a #8 scoop. As currently served, this entrée provides 1 oz. eq. meat/meat alternate.

30 day carryover was completed correctly for the 17-18 school year, however, there is a new food service director now and technical assistance was provided. During the review, properly handling the status of children for whom an application has not been submitted was discussed with the SFA. If a child has not submitted an application or is not on the Direct Certification list the student will either receive carryover status from the previous year, for the first 30 operating days, if applicable or will be considered "paid" until an application is received and approved based on the information provided on the application. A student is only eligible for carryover benefits if during the previous school year they were enrolled within the SFA and were receiving free or reduced meal benefits. Additionally, if a new student is enrolled in the SFA and they have other household members that attended in the previous year, the carryover status may be extended to this child. Carryover status only applies for the first 30 operating days of the school year or until a new application is approved, whichever comes first. The SFA may not backdate eligibility statuses for students who submit an application after the beginning of the school year.

The FSD was advised to use a notification letter and to keep a copy of the letter on file. If notifications for free or reduced benefits are provided verbally, a note must be made of when talk happened, who was talked to and the information provided and who made the call.

The SFA does not have a backup system in place should the primary system fail/not operate. During the review, a backup system was discussed with the SFA. The SFA does not have a backup system in place. Should the primary system fail or not operate, it is recommended that the SFA have a backup system in place such as a printed BID list from the point of service. The SFA acknowledged the technical assistance and will implement needed changes immediately.

Verification- During the review, the verification process was reviewed with the SFA. Recommend viewing webinars on how to complete verification and attend trainings when possible on verification. The SFA should refer to the Eligibility Manual for School Meals. All of which are available on the DPI website. <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/verification>

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. The results of the assessment must be made available to the public.

Smart Snacks- During the review, having a process for ensuring non-packaged or recipe based items are in compliance was discussed with the SFA. The SFA should have a method of ensuring all items (including non-packaged or recipe based items) meet Smart Snacks requirements. The SFA should keep a copy of the printouts from the smart snack calculator on file for all packaged items if they are to be sold during the school day.

Standardized recipes must always be followed when preparing food for the breakfast and lunch program.

SFA Name: Weyauwega-Fremont School District
 SFA Code/ID: 686384

Administrative Review Conducted: Thursday, December 14, 2017
 Site(s) Selected for Review: 0
0
0

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: 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 Use	
		Appv.	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.			
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: Certification and Benefit Issuance

The hearing official is the same SFA representative that made the original eligibility determination.

Technical Assistance

During the review, hearing official requirements were discussed with the SFA. The hearing official must be a different individual from the one who made the original eligibility determination. The SFA must ensure that all documents and public releases mentioning the hearing official are updated.

For detailed regulation see: 245.7(a)(2)(vii)Hearing official

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 the person by position who will be the hearing official and the determining official.			

Finding #3: Civil Rights

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	
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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 written procedure for how the SFA will handle any alleged civil rights complaints.			

Finding #4: Verification

The SFA does not have a confirming official designated and the confirmation review was not completed.

Technical Assistance

During the review, documenting the confirmation review was discussed with the SFA. The SFA must conduct confirmation reviews and maintain documentation that these took place.

For detailed regulation see: 245.6a(e) Activities prior to household notification

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 complete a confirmation review on all applications that are selected for verification.			

Finding #5: Reporting and Record Keeping

Records for verification were not retained for 3 years after the final Claim for Reimbursement for the fiscal year or until resolution of any audits.

Technical Assistance

Records must be retained for three (3) years after the final Claim for Reimbursement for the fiscal year or until the resolution of any audits. It was determined that the SFA was not retaining records for 3 years after the final Claim for Reimbursement. The requirement for the SFA to retain records for the required time period was discussed with the SFA.

For detailed regulation see: 210.23 (c) Retention of records.

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 includes: an indication that records will now be maintained for required time period and that a process that has been put into place to ensure that all required records will be maintained for 3 years after the final claim for reimbursement or until the resolution of an audit.			
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Finding #6: 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 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. Recommend visiting the DPI website and use their tracker template.

For detailed regulation see: 210.30(g) School food authority oversight.

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 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.			

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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