



Administrative Review Summary and Corrective Actions

SFA Name:	Solon Springs School District
SFA Code/ ID Number:	165397
Administrative Review Conducted on:	Tuesday, November 14, 2017

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on November 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 **1/7/18**. 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,

Ahn Ei Sweeney, RD, SNS, Senior Vice President

CN Resource

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Administrative Review Technical Assistance Summary

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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.
There were no resource management findings. 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.
Thank you for your kind accommodations during the review and for having your documentation organized.
The staff was friendly and had a great rapport with the students, even calling them by name.
You did a great job on the food for the day of review meal. It was nice to see fresh fruit and vegetables served for both meals. Everything looked fresh and inviting. Batch cooking the pizza made sure every student received a nice hot slice.

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.
<p>Resource Management - Internal Controls</p> <p>The SFA has weaknesses in their internal controls that increase the risk of unallowable costs being charged to the food service program, as well as increase the susceptibility of the program to errors and fraud. These weaknesses were addressed on a district level during the SFA's annual audit, and are also applicable to the food service program. The SFA's finance manager has incompatible duties due to their control over cash handling, recordkeeping, and reconciliatory functions. Even small programs can implement compensating controls to mitigate risks. Some suggestions include: 1) the district superintendent or other district authority should receive the unopened bank statements and review before sending to the finance manager, 2) the district superintendent or other district authority should review and approve the monthly bank reconciliations completed by the finance manager, and 3) deposits are best made on a more regular basis (preferably weekly) and two employees should be present at the final cash count before the finance manager makes a deposit.</p>
Food Safety Storage - technical assistance was provided regarding boxes on the floor of the freezer. Things were put away throughout the day, so no further corrective action is required.
Local School Wellness Policy - The wellness policy has not been reviewed and updated for some time. Technical assistance provided regarding: the review and assessment, the wellness committee, notifying potential stakeholders, triannual review, designation of a person or persons responsible for oversight, and making the assessment available to the public.
Verification - The verification process was reviewed with the director including counting the number of applications on file as of Oct 1st each year; the sample size, notification, etc.

SFA Name:	Site(s) Selected for Review:			
<i>Solon Springs School District</i>	1 <i>Solon Springs School District</i>	NSLP Grade Group: K-5, 6-8, 9-12	SBP Grade Group: K-5,K-12	<input type="checkbox"/> N/A
SFA ID Number:	2 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
<i>165397</i>	3 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
Week of Menu Review:	<i>10/2/17 - 10/6/17</i>			

Menu Review Findings: Lunch

Kindergarten Only

1. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for grain. A grain 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 weekly requirement for meat/meat alternate. A meat/meat alternate was offered daily, however the weekly minimum requirement was 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.

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Administrative Review Conducted: Tuesday, November 14, 2017
 Site(s) Selected for Review: Solon Springs School District
N/A
N/A

Date Corrective Action Plan was provided to SFA: 12/7/2017

Due Date for Corrective Action Plan: 1/7/2018

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: Verification			
The SFA did not complete verification.			
Technical Assistance			
During the review, completing verification was reviewed with the SFA. The SFA was informed that they must complete verification according to regulations and within the correct timeframe. The SFA should review the current Income Eligibility Manual for additional verification information.			
For detailed regulation see: CFR 245.6a(C)(1) General.			
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. List the steps the SFA will take in order to complete verification.			

Finding #2: Civil Rights 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 revised procedure for how the SFA will handle any civil rights complaints.			

Finding #3: Wellness Policy

The SFAs Local Wellness Policy does not contain all of the required components. The Wellness Policy does not include designation of one or more SFA officials in charge of school compliance oversight. In addition, the policy has not be reviewed or updated.

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. In addition, 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. 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>

For detailed regulation see: 210.31 Local school wellness policy

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 has been charged with oversight and who will ensure compliance.			
3. Provide a link or a copy of the reviewed and updated wellness policy.			

Finding #4: Meal Signage Breakfast and Lunch

Signage is not posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal for breakfast or lunch. Offer versus Serve reimbursable meal signage is not posted, including the requirement for students to select at least 1/2 cup fruit or vegetable.

Technical Assistance

During the review, the importance of signage was discussed with the SFA. The SFA must ensure that signage is posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal including offer vs serve requirements that include taking 1/2 cup of fruit at breakfast and 1/2 cup of fruit or vegetable at lunch.

For detailed regulation see: 220.8(a)(2) Unit pricing & 210.10(a)(2) Unit pricing.

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 meal signage has been posted for both breakfast and lunch.			

Finding #5: Food Safety and Storage

Storage violations were observed on-site. The SFA had food that was not dated upon delivery.

Technical Assistance

During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated upon delivery.

For detailed regulation see: 210.13(d) (d) Storage.

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 food items are dated with the delivery date and all food will be stored at least six (6) inches off the floor in all storage areas.			

Finding #6: SFSP Outreach

The SFA has not performed SFSP outreach.

Technical Assistance

It was determined during the review that the SFA has not performed SFSP outreach. The SFA must perform SFSP outreach before the end of the school year. Methods of outreach such as posting SFSP information on the SFA's website, parent newsletters and district-wide emails were discussed with the SFA.

Schools may fulfill this requirement through Robo calls, flyers or other methods that notify the community of locations of summer meal sites.

Methods to locate sites that serve free meals to children during the summer include the following:

- Call 211

For detailed regulation see: 210.12(d) Outreach activities. (2)

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 SFA will cooperate with Summer Food Service Program sponsors to conduct outreach on the			
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Finding #7: Food Safety and Storage

The SFA's food safety plan does not contain the required elements. Menu items are not groups according to process approach.

Technical Assistance

During the review, the food safety plan was discussed with the SFA. The SFA must have a complete food safety plan that includes all of the required sections as specified by USDA.

A school food authority with a food safety program based on the process approach to HACCP must ensure that its program includes:

Standard operating procedures to provide a food safety foundation;

Menu items grouped according to process categories;

Critical control points and critical limits;

Monitoring procedures;

Corrective action procedures;

Recordkeeping procedures;

Periodic program review and revision.

For detailed regulation see: 210.13(c) Food safety program.

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 food safety plan has been updated to include the required elements.			
4. Provide documentation that demonstrates the food safety plan has been updated and now contains all the required elements.			

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.