



Administrative Review Summary and Corrective Actions

SFA Name:	Immanuel Lutheran High School
SFA Code/ ID Number:	187159
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 Wednesday, 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 11, 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
1930 N Arboleda, 101, Mesa, Arizona 85213
p 866 941.6368 f 480 325.9967

Administrative Review Technical Assistance Summary

SFA Name:	Immanuel Lutheran High School
SFA Code/ID Number:	187159
Administrative Review Conducted on:	Wednesday, November 15, 2017

Commendations & Suggestions
Great work meeting the whole grain-rich requirement for breakfast and lunch.
The SFA was eager to learn from all technical assistance provided in order to run the best program possible.
The students do a great job of selecting a variety of fruits and vegetables as they proceed through the line.

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.
Meal Counting and Claiming - During the review, edit checks were discussed with the SFA. The SFA does not conduct a daily edit check for each meal service, but instead on a weekly basis. To be in compliance, the SFA must ensure that edit checks are completed daily.
Local School 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.
Professional Standards - During the review, annual training hour requirements were discussed with the SFA. To be in compliance, the SFA must ensure that the School Nutrition Program Director completes the required amount of training annually. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.
Professional Standards - 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. DPI has a tracker on their website that the SFA can download and utilize.
Direct Certification - During the review, Direct Certification matches were discussed with the SFA. The SFA must perform at least 3 Direct Certification matches according to the timeframes established by the State Agency. The SFA may elect to complete additional direct certification matches however at a minimum they must complete 3 match within the set timeframe. It is recommended that the SFA perform the matches on a monthly basis.
Verification - The SFA had not sent the letter to the household notifying them of the result of verification prior to the day of review. On the day of review, the SFA was shown the We Have Checked letter and it was sent to the household.
Food Safety - During the review, health inspections were discussed with the SFA. The SFA must post a copy of the most recent food safety inspection in a publicly visible location at the site.
Civil Rights - The SFA is attempting to handle civil rights complaints in house. The SFA was shown where to locate the USDA Civil Rights Complaint Form on DPI's website and technical assistance provided that complaints should be forwarded to the USDA.

SFA Name: Immanuel Lutheran High School

Site(s) Selected for Review:

SFA ID Number: 187159

Week of Menu Review:

10/2/17 - 10/6/17

1 Immanuel Lutheran High School	NSLP Grade Group: 9-12	SBP Grade Group: 9-12	<input type="checkbox"/> N/A
2 N/A	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
3 N/A	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 weekly requirement for the beans/legumes vegetable subgroup.

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, the breakfast menu did not meet the requirement of no more than 50% of the fruit offerings may be in the form of juice. This was observed from the day of review when students had the ability to take 1 or more cups of fruit juice.

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.

For detailed regulations see: 7 CFR 220.10

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.			

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 SFA Code/ID: 187159

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

Date Corrective Action Plan was provided to SFA: 12/11/2017

Due Date for Corrective Action Plan: 1/11/2018

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 has not collected racial/ethnic data on an annual basis.			
Technical Assistance			
During the review the requirement to collect racial/ethnic data was discussed with the SFA. The SFA must collect racial/ethnic on an annual basis through the mechanism of their choosing.			
For detailed regulation see: FNS Instruction 113-1 Appendix B Section F			
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 racial/ethnic data collection sheet.			
4. Provide a statement of assurance that this information will be collected annually.			

Finding #2: Local School Wellness Policy	
The SFAs Local Wellness Policy does not contain all of the required components. The Wellness Policy does not include goals for nutrition education and nutrition promotion.	
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 DPI Wellness Policy Checklist: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf>

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 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 #3: 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
- Call 1.866.3Hungry or 1.877.8Hambre
- Visit the website: www.fns.usda.gov/summerfoodrocks (note, this replaces the whyhunger.org website)
- Use the site locator for smartphones - Rangeapp.org

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 availability of the Summer Food Service Program.			
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Finding #4: Certification and Benefit Issuance

Not all selected applications were approved correctly. The SFA did not base its determination on all sources of income listed on the application. Not all income based applications included the last four digits of the social security number of an adult household member, or an indication of none. One application changed from reduced to denied.

Technical Assistance

During the review, determining applications was discussed with the SFA. When determining the total household income the SFA must use all income provided on the application. When determining eligibility, the SFA must ensure that the household has included the last four digits of the social security number of an adult household member (or an indication of none); otherwise, the application is incomplete. For more information, see the Eligibility Manual for School Meals, Chapter 3.

For detailed regulation see: Eligibility Manual, Chapter 3: Establishing 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 change in eligibility status.			

Finding #5: Certification and Benefit Issuance

The SFA annualized income when it should have been determined at its stated frequency.

Technical Assistance

During the review, making determinations based on the stated frequency was discussed with the SFA. When determining eligibility, the SFA may not annualize income unless income sources are listed at different frequencies. If there are multiple income sources with more than one frequency, the LEA must annualize, that is, calculate all income as for an entire year, by multiplying: Weekly income by 52; or Bi-weekly income (received every two weeks) by 26; or Semi-monthly income (received twice a month) by 24; or Monthly income by 12.

For detailed regulation see: 245.6(c)(4) 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 statement of understanding that income will not be annualized when it should be determined at its stated frequency (monthly, weekly, bi weekly, or 2 x per mo.)			

Finding #6: Food Safety

The SFA's food safety plan does not contain the required elements. The plan does not contain a list of menu items grouped by 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;

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.			

Finding #7:

The SFA is charging the same meal price for free, reduced, and paid resident students.

Technical Assistance

The SFA should have a designated portion of their room & board fees for meals, and this meal portion should differ depending on the student's application status. Free students should not be charged for breakfasts and lunches, reduced students should pay the reduced amount per breakfast and lunch, and paid students should pay the same as the day students for breakfast and lunch. Likewise, the college residents should be charged more than the high school students for breakfast and lunch, as the school does not receive reimbursement to help offset the costs of these nonreimbursable meals. All students can be charged the same for suppers and weekend meals, as these are nonreimbursable meals. Since the SFA receives the room and board in the school's general fund, they should make a designated fund transfer to move the revenue for the reduced & paid reimbursable meals into the food service account, as well as a transfer for all nonreimbursable meals (high school suppers & weekend meals, and all college meals). This should be separate from the annual operating transfer to eliminate the deficit in the food service program.

For detailed regulation see:

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Explain how the room & board fees will vary depending on the student's status (free, reduced, paid, or nonreimbursable).			
2. Provide assurance that an annual (or semester) transfer will be made to directly transfer the meal revenues into the food service			

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
 P.O. Box 31060
 Mesa, AZ 85275
 866-941-6368
adminreview@cnresource.com