



## Administrative Review Summary and Corrective Actions

SFA Name:	Brighton #1 School District
SFA Code/ ID Number:	300657
Administrative Review Conducted on:	January 25, 2018

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on January 25, 2018 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 **March 23, 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:	Brighton #1 School District
SFA Code/ID Number:	300657
Administrative Review Conducted on:	January 25,2018

### Commendations & Suggestions

Great work meeting the whole grain-rich requirement for the week of menu review!

The Food Service staff was very friendly and knowledgeable on the NSLP requirements.

The Administrative staff was very helpful and willing to accept technical assistance where needed to properly execute the National School Lunch Program

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)

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.

On site review- SFA was provided with technical assistance with regards to field trips. When providing lunches for field trips a roster should be provided to the staff responsible for the distribution of the lunches, regardless of the number of lunches provided.

SFA Name:  
Brighton #1 School District

Site(s) Selected for Review:

SFA ID Number:  
300657

1 Brighton Elementary	NSLP Grade Group: K-5, K-8	SBP Grade Group: <input checked="" 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

Week of Menu Review:  
12/4/17 - 12/8/17

**Menu Review Findings: Lunch**

**Site 1:**

Grades 4-8 Only- 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 the weekly meat/meat alternate requirement is now met. Include details to describe what specific changes were made to the menu to correct all menu review findings and bring the menu into compliance.			
2. Submit any necessary documentation to demonstrate that the menu findings listed under step 1 are now corrected. This documentation may include: production records, nutrition facts labels, Child Nutrition (CN) labels, and recipes. Reference the menu review results report for specific details and suggestions to bring the menu into compliance.			
3. 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.			
4. Provide a written statement that the serving line will be visually reviewed prior to service to confirm that all required components are available.			

5. Submit the position title(s) of the School Food Authority representative(s) that will oversee this area and ensure future compliance.

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SFA Name: Brighton #1 School District  
 SFA Code/ID: 300657

Administrative Review Conducted: January 25,2018  
 Site(s) Selected for Review: Brighton Elementary  
N/A  
N/A

Date Corrective Action Plan was provided to SFA: 2/21/2018

Due Date for Corrective Action Plan: 3/23/2018

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 by November 15; a confirmation review was not completed; the application was not verified correctly.			
Technical Assistance			
During the review, completing verification on time was discussed with the SFA. The SFA must complete verification according to program regulations.			
245.6a(b), 245.6a( e)(1)(i), Deadline and extensions, Confirmation Review, Eligibility Manual Chapter 4C			
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 to perform verification according to all program regulations.			

Finding #2: Civil Rights			
The SFA is attempting to resolve complaints alleging discrimination within the FNS School Meal Programs.			
Technical Assistance			
During the review the process for receiving and processing complaints alleging discrimination was discussed with the SFA. The SFA should not attempt to resolve complaints in-house and should forward all complaints to the appropriate outside agency.			
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 statement of assurance that all alleged civil rights complaints regarding the meal programs will not be handled internally and that the complaints will be forwarded to the appropriate agency.			
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**Finding #3: Civil Rights**

The SFA must use the current civil rights statement on all Program materials. The SFA is not using the civil rights statement on the Verification letter.

**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.			

**Finding #4: 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.

**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.			
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#### Finding #5: Wellness Policy

An assessment of the Local School Wellness Policy has not been completed.

#### Technical Assistance

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.

#### 210.31(e) 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 assessment of the wellness policy.			

#### Finding #6: Buy American

The SFA is not in compliance with the Buy American provision. Noncompliant food items were observed and no documentation was available justifying the limited exception(s), including Mandarin Oranges and Pineapple.

#### Technical Assistance

During the review, Buy American requirements were discussed with the SFA. The SFA must purchase, to the maximum extent practicable, domestic commodities or products. "Domestic commodity or product" is defined as an agricultural commodity that is produced in the U.S. and a food product that is processed in the U.S. substantially using agricultural commodities produced in the U.S. There are limited exceptions to the Buy American provision which allow for the purchase of foods not meeting the "domestic" standard in circumstances when use of domestic foods is truly not practicable. The SFA must keep documentation justifying the limited exception(s).

#### 210.21(d) Buy American

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 understands the Buy American provision. As part of the statement, the SFA must state that documentation justifying the limited exception(s) is now maintained on file for the noncompliant food items identified during the review.			
4. Provide documentation justifying the limited exception(s) for the noncompliant food items, Mandarin Oranges and Pineapple, that were identified during the review.			

**Finding #7: 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.

**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			

**Finding #8: Civil Rights**

The SFA did not provide the yearly civil rights training for the appropriate staff.

**Technical Assistance**

During the on-site review the requirement to provide a yearly civil rights training was discussed with the SFA. The SFA must provide civil rights training at least once a year to all frontline staff and supervisor and maintain all required documentation.

**FNS Instruction 113-1 Section XI Training**

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 civil rights training to all appropriate staff.			



4. Provide a statement of assurance that civil rights training will be provided annually to all appropriate staff.			
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### Finding #9: Resource Management

The SFA did not reimburse the food service account for catering expenses.

#### Technical Assistance

The food service program used funds from the nonprofit school food service to provide lunch for an in-service day for staff but was not reimbursed for these purchases. This is an unallowable use of food service funds. If catering services are provided, the food and labor expenses incurred must be reimbursed to the food service account. The food service department should bill the receiving department or organization and ensure payment is received in full for every catering event.

#### 7 CFR 210.14 (a) Nonprofit School Food Service

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Provide a written statement of understanding that all catering expenses incurred by the food service program will be reimbursed in full.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			

### Finding #10: Certification and Benefits Issuance

Not all selected applications were approved correctly. The SFA did not base its determination on all sources of income listed on the application.

#### Technical Assistance

During the review, determining applications was discussed with the SFA. When determining eligibility, the SFA must ensure that the household has listed the amounts, source, and frequency of current income for each household member; otherwise, the application is incomplete. For more information, see the Eligibility Manual for School Meals, Chapter 3. When determining the total household income the SFA must use all income provided on the application.

#### 245.6(c)(4) Application, eligibility and certification of children for free and reduced price meals

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.			
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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.

<input type="checkbox"/> 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.
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If you have any questions, feel free to contact CN Resource at your convenience. Thank you.



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