



Administrative Review Summary and Corrective Actions

SFA Name:	Paris J1 School District
SFA Code/ ID Number:	304235
Administrative Review Conducted on:	Thursday, February 15, 2018

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on February 15, 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 **April 13, 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

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Commendations & Suggestions

Great job meeting the whole grain-rich requirement for the week of menu review.

The Food Service staff was very friendly to students and provided a great lunch the day of review. Students seemed to enjoy the variety of food.

All staff were very helpful and accommodating during the review process. They were quick to provide information needed to complete review.

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.

The SFA must assess wellness policy every 3 years or more frequently as needed.

The SFA should reach out to community members via e-mails or new letters for participation on the wellness policy committee.

On the day of review, on the lunch production record, the green beans are listed as a dark green vegetable and they should be under the other category. Recommend reviewing the vegetable subgroup chart.

<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf>

SFA Name: <i>Paris J1 School District</i>	Site(s) Selected for Review: 1 <i>Paris Elementary</i>	NSLP Grade Group: K-8	SBP Grade Group: <input checked="" type="checkbox"/> N/A
SFA ID Number: 304235	2 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group: <input type="checkbox"/> N/A
Week of Menu Review: 1/8/18 - 1/12/18	3 <i>N/A</i>	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 daily vegetable requirement. Vegetables were offered daily, however the minimum required portion size was not met. This is a repeat finding from your previous administrative review and may result in fiscal action.

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 daily vegetable 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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Administrative Review Conducted: Thursday, February 15, 2018
 Site(s) Selected for Review: Paris Elementary
N/A
N/A

Date Corrective Action Plan was provided to SFA: 3/13/2018

Due Date for Corrective Action Plan: 4/13/2018

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.			
Technical Assistance			
During the review, completing verification on time was discussed with the SFA. The SFA must complete verification by November 15.			
245.6a(b) Deadline and extensions			
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 that include specific dates for completion.			

Finding #2: Verification			
The SFA did not get SA approval for an extension until December 15.			
Technical Assistance			
During the review, the need for approval for a verification extension was discussed with the SFA. The SFA must receive approval from the State Agency if going past the November 15 deadline.			
245.6a(b) Deadline and extensions			
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 receive approval from the State Agency if going past the November 15			

Finding #3: Meal Counting and Claiming

The SFA does not conduct a daily edit check for each meal service.

Technical Assistance

During the review, edit checks were discussed with the SFA. The SFA does not conduct a daily edit check for each meal service. To be in compliance, the SFA must ensure that edit checks are completed daily. How to complete edit checks to ensure meal counts do not exceed attendance adjusted eligible and/or total enrollment was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately. The SFA should change their attendance factor within Skyward to not be 100%. Recommend contacting Skyward for technical assistance with their software. Recommend looking at the Wisconsin DPI edit check as an example.

210.8(a)(3) Edit checks.

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 SFA will complete a daily edit check and will maintain edit check records for a minimum of 3 years plus the current school year.			
4. Provide one month of completed edit checks for the site(s) selected for review as supporting documentation for this finding.			

Finding #4: Civil Rights

The SFA must use the current civil rights statement on all Program materials. The SFA is not using the abbreviated civil rights statement on their menu.

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.

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. Ex: any letter to the household.			

Finding #5: 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			

Finding #6: 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. This includes non nutrition staff with nutrition program responsibilities.

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.			

5. Provide a copy of the sign in sheet for the training.			
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Finding #7: 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.

0.30(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.			

Finding #8: Food Safety

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).

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 that were identified during the review.			

Finding #9: 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 #10: Resource Management

The SFA had an excess of three months average expenditures in its year-end net cash resources, and did not have approval from the State Agency. Additionally, the SFA incorrectly reported financial information on the SY 16-17 Food Service Financial Report.

Technical Assistance

The SFA must not accumulate net cash resources exceeding three months' average expenditures, unless they receive prior approval from the State Agency. During the review it was determined that the SFA had an excess cash balance and did not have prior approval from the State Agency. The ending fund balance was \$36,622 and three month average expenses were \$25,670, resulting in an excess cash balance of \$10,952. Additional technical assistance was given during the review, explaining how to calculate compliance with net cash resource requirements. The SFA should submit a spend-down plan explaining how the net cash resources will be spent down to an appropriate level. The SFA can purchase new equipment, improve food quality, upgrade food service software, implement additional food service training, increase food service wages and benefits where appropriate, etc. in order to improve the food service program.

Additionally, the SFA should ensure that all financial information submitted to the State Agency as part of their annual food service financial report is reported accurately. The SFA's beginning fund balance for SY 16-17 does not match the ending balance per the SY 15-16 report. These numbers should always tie. Additionally, the SFA's revenues & expenditures on the SY 16-17 AFR do not match the Fund 50 reports. If the SFA submits the AFR before the annual audit is complete, the AFR should be revised if any audit adjustments are made to Fund 50. The SFA needs to revise the SY 16-17 AFR with the corrected numbers, and provide assurance that the ending balance will tie to the following year's beginning balance on future AFRs.

For detailed regulation see: 210.14(b) Net cash resources.

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Submit a spend-down plan explaining how the SFA will lower the nonprofit school food service fund balance to a level at or below 3 months average expenditures. This should include estimated dates and amounts of any planned purchases/costs, as well as an expected timeline for spending down the balance.			
2. Provide a written statement explaining the internal controls that have been put into place to ensure that the food service net cash resource balance will remain under 3-months' average expenses in the future, or prior approval will be received from the State Agency if an excess balance is expected.			
3. Revise the SY 16-17 annual financial report in order to correct the errors found during the review, and resubmit the reports to DPI. Submit a copy of the revised report as part of the corrective action response, along with an explanation of the revisions made.			
4. Provide a written statement that the SFA representative responsible for completing the financial report has reviewed DPI's training on how to complete the report (under "Annual Food Service Financial Report" on DPI's financial website: https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial). This should include a statement of assurance that the ending balance of the previous year's AFR will tie to the beginning balance of the following			

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

Required Corrective Actions- Review Areas
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

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