NUTRITION PROGRAMS SIMPLIFIED

Administrative Review Summary and Corrective Actions

SFA Name:	Twin Lakes #4 School District
SFA Code/ ID Number:	305817
Administrative Review Conducted on:	January 10,2018

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on January 10,2018 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 2, 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:	Twin Lakes #4 School District
SFA Code/ID Number:	305817
Administrative Review Conducted on:	January 10,2018

Commendations & Suggestions
Great job meeting the whole grain-rich requirement for the week of menu review.
Julie and her team are doing a great job to provide a nutritous lunch for the students at Laewood Elementary.
Sara Markee was very helpful during the review. She has been able to keep stability in the school while they work with the new adminstration at the school.

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.
During the review the Afterschool Snack Program was discussed with the SFA. The SFA has only claimed one month of snacks, October 2017. The SFA was made aware that these snacks may be disallowed due to grant money received for the snack program.

Required Corrective Actions- Menu Review

SFA Name:
Twin Lakes #4 School District
SFA ID Number:
305817
Week of Menu Review:
11/13/17 - 11/17/17

Site(s) Selected for Review:

1	*Lakewood School*	NSLP Grade Group: K-8	SBP Grade Group: K-8	☐ N/A
2	*N/A*	NSLP Grade Group:	SBP Grade Group:	☐ N/A
3	*N/A*	NSLP Grade Group:	SBP Grade Group:	☐ N/A

Menu Review Findings: Lunch

Site 1:
For the week of menu review, the weekly grain based dessert requirement was not met for lunch. No more than 2 ounce equivalents of grain based desserts may be offered weekly.

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 grain based dessert 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.			

Menu Review Findings: Breakfast
For the week of menu review, the breakfast menu did not meet the minimum daily fruit requirement. Fruit was offered daily, however the minimum required portion size 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 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 written statement that the daily fruit 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.			

Required Corrective Actions- Review Areas

SFA Name: Twin Lakes #4 School District

SFA Code/ID: 305817

Administrative Review Conducted: January 10,2018

Site(s) Selected for Review: Lakewood School

N/A

N/A

Date Corrective Action Plan was provided to SFA: 1/31/2018

Due Date for Corrective Action Plan: 3/2/2018

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 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.			

Finding #2: Resource Management
The SFA incorrectly reported financial information on the annual food service financial report to the State Agency.
Technical Assistance

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. During the resource management review, one or more mistakes were found on the financial report. Additional technical assistance concerning the specific mistakes was provided in an email to the SFA.

1. Total revenues and total expenses do not match the Fund 50 general ledger reports. This resulted in the ending fund balance not matching the ending balance per Fund 50. The SFA should have included commodities in revenues. The SFA also omitted a $3,971.55 "state payment" expense that was recorded to Fund 50. The financial report should match Fund 50 activity, otherwise the food service fund balance will not be correctly reported to DPI.

2. The beginning fund balance reported for SY 16-17 ($10,049.61) does not match the ending balance per the SY 15-16 report ($2,602.07). The balances also do not tie out for previous years' reports. The ending balance of one year should always tie out to the beginning balance of the following year. The SFA will need to resolve this discrepancy.

For detailed regulation see: 210.14(c) Financial assurances.

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.
1. Revise the SY 16-17 and previous years financial reports in order to correct the errors found during the review, and resubmit the reports to DPI. Submit copies of the revised reports as part of the corrective action response, along with an explanation of the revisions made.			
2. 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).			

Finding #3: Resource Management

The SFA's adult meal price is not in compliance with FNS Instruction 782-5, Rev. 1.

Technical Assistance

The SFA has priced their adult meals below the cost of producing these meals. The SFA also misreported adult meal prices in their DPI contract. Adult meals should be priced at least at the student price plus per-meal reimbursements and the value of commodities received. In the current year, the SFA priced adult lunches at $3.45, but should have charged at least $3.52 ($2.85 student price + $.39 federal reimbursement + $.2325 value of commodities + $.0482 state reimbursement). The SFA reported an adult lunch price of $3.50, which does not match what they are currently charging or what they should be charging. The DPI Adult Meal Memo was sent to the SFA in an email. This memo, along with updated reimbursement rates and the value of commodities can be found on DPI's Financial Management website: https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial

For detailed regulation see: FNS Instruction 782-5, Rev. 1

Required SFA Response	SFA Response	CNR Internal Use	
		Appv.	Intls.

Required Corrective Actions- Review Areas

1. Provide the date that the finding was brought into compliance or the planned date of completion. This should include documentation showing the new adult meal price.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Provide a written statement outlining the SFA's adult meal pricing policy. This policy should establish guidelines for an annual reassessment of adult meal prices in line with FNS Instruction 782-5.			
4. Revise the adult meal price in your DPI contract.			

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
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