



## Administrative Review Summary and Corrective Actions

SFA Name:	Chileda Institute, Inc.
SFA Code/ ID Number:	329115
Administrative Review Conducted on:	Tuesday, May 1, 2018

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on May 1, 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 **June 14, 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:	Chileda Institute, Inc.
SFA Code/ID Number:	329115
Administrative Review Conducted on:	Tuesday, May 1, 2018

### Commendations & Suggestions

Outstanding job meeting all of the requirements for breakfast and lunch. All daily and weekly meal component and food quantity requirements were met for the week of menu review.

The SFA does a great job promoting all components to all students during meal service.

The SFA was open to all feedback and willing to make any necessary changes.

### Other areas of Technical Assistance (Does NOT require SFA Response)

**Certification and Benefit Issuance** - During the review, documenting extended eligibility was discussed with the SFA. Per USDA the SFA must make an effort, to the extent possible, to identify additional children in the same household of those certified for assistance program benefits. The SFA must base extended eligibility on allowable records as outlined in USDA memo SP 25-2010. The SFA must maintain documentation for extended eligibility, the SFA may use a variety of methods to maintain this documentation. Some SFAs, write the name of the student that the benefits are extended to next to the student from the same household on the direct certification list. In this case the SFA should document the date added, the SFA representative's signature or initials with the name of the added student. Other SFAs maintain a consolidated list of students that have been extended eligibility, in this case the list includes: the name of the student, the name of the student that eligibility is extended through, and the date added. The list should have the name of the SFA representative that determined the extended eligibility.

**Certification and Benefit Issuance** - During the review, updating the point of service was discussed with the SFA. When eligibility changes, the SFA must make these updates at the point of service. When there is an increase in benefits the SFA should make the change immediately, if there is a decrease or termination in benefits the household should be provided 10 days of adverse action before the status is changed.

**Meal Counting and Claiming** - To be in compliance, the SFA must ensure that meal counts taken at the point of service correctly identify the number of breakfast meals served. Tracking students accurately at the point of service was reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.

**Civil Rights** - During the review the requirement for the most current civil rights statement to appear on all Program material, including menus, 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.

**Local School Wellness Policy** - 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.

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.

SFA Name: Chileda Institute, Inc.  
 SFA Code/ID: 329115

Administrative Review Conducted: Tuesday, May 1, 2018  
 Site(s) Selected for Review: Chileda Institute, Inc.

Date Corrective Action Plan was provided to SFA: 5/10/2018

Due Date for Corrective Action Plan: 6/14/2018

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: Certification and Benefit Issuance			
The hearing official is the same SFA representative that made the original eligibility determination.			
Technical Assistance			
During the review, hearing official requirements were discussed with the SFA. The hearing official must be a different individual from the one who made the original eligibility determination. The SFA must ensure that all documents and public releases mentioning the hearing official are updated.			
For detailed regulation see: 245.7(a)(2)(vii)Hearing official			
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 the person by position who will be the hearing official and the determining official.			

Finding #2: Certification and Benefit Issuance			
Not all selected applications were approved correctly. The SFA did not calculate the income correctly.			
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.			
For detailed regulation see: 245.6(c)(4) Application, eligibility and certification of children for free and reduced price meals and free milk			
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 #3: Certification and Benefit Issuance**

The SFA is not annualizing with applications reporting more than one frequency.

**Technical Assistance**

During the review, the conversion factors were discussed with the SFA. When determining eligibility, the SFA must utilize the correct income version factors as outlined in the Eligibility Manual for School Meals, Chapter 3. 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 be calculated using the correct conversion factors when more than one income frequency is on an application.			

**Finding #4: Verification**

The SFA’s verification process is not being conducted according to USDA guidelines: The SFA did not maintain documentation to demonstrate compliance with the verification requirements; A denied application was selected; The household was not sent a Notification Letter; Income was not properly verified.

**Technical Assistance**

During the review, verification requirements were discussed. The SFA was directed to the Eligibility Manual for School Meals for additional training.

*For detailed regulation see:*

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 <i>Eligibility Manual for School Meals Section 6: Verification</i> has been reviewed.			
3. List the steps the SFA will take to correctly complete verification.			

#### Finding #5: Meal Components and Quantities/Offer versus Serve

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

#### Technical Assistance

During the review, the requirement for Offer versus Serve meal signage was reviewed with the SFA. Requirements include identifying, near or at the beginning of the serving line(s), the food items that constitute a reimbursable meal, including the requirement that students must take at least 1/2 cup of the fruit or vegetable component.

*For detailed regulation see: 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 written statement that Offer versus Serve reimbursable meal signage is now posted. In the statement provide the location where signage was posted.			

#### Finding #6: Offer versus Serve

Offer versus Serve is not being implemented correctly. Students were not required to select 1/2 of fruit or vegetable at breakfast. No non-reimbursable meals were observed on the day of review. Training has not been provided for staff to properly implement offer versus serve.

#### Technical Assistance

During the review, the meal pattern requirements for Offer versus Serve were reviewed with the SFA. Requirements include that the SFA must offer the five food components specified in the meal pattern, and students must be allowed the option to deny two items, except that they must take at least a 1/2 cup of either the fruit or vegetable component or 1/2 cup combination of fruit and vegetable. The SFA must provide training for all staff who have to identify reimbursable meals following offer versus serve.

*For detailed regulation see: 210.10 (e) Offer versus serve.*

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 students are now required to take at least 1/2 cup fruit or vegetable at breakfast.☐			
4. Provide a statement of assurance that all breakfast staff have been trained on Offer versus Serve breakfast meal requirements.			

#### Finding #7: Civil Rights

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 written procedure for how the SFA will handle any alleged civil rights complaints.			

#### 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.

*For detailed regulation see: 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 staff that serve breakfast to residential students.			

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.			

#### Finding #9: Civil Rights

The "And Justice for All" poster is not visible by the students.  
The "And Justice for All" poster is outdated.

#### Technical Assistance

During the review the requirement for the "And Justice for All" poster were discussed with the SFA. The poster must be on display in all serving/dining areas, the poster must be displayed in a location that is visible to students was discussed with the SFA, and the poster must be 11" wide x 17" high. The poster displayed must be the current version.

*For detailed regulation see: FNS Instruction 113-1 Section B*

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 the posters must be visible to all customers.			
4. Provide a statement of assurance that the most current poster is posted.			

#### Finding #10: 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).

#### 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). These exceptions, as determined by the SFA, are:

- The product is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality; or
- Competitive bids reveal the costs of a U.S. product are significantly higher than the non-domestic product.



### Required Corrective Actions- Review Areas

<i>For detailed regulation see: 210.21(d) Buy American</i>			
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 #11: Civil Rights

The SFA did not submit a public release.

#### Technical Assistance

During the review the requirement for a public release to be submitted for publishing was discussed with the SFA. At or near the beginning of each year, the SFA must submit a public release to the local media, the unemployment office and any major employers who are contemplating large layoffs in the attendance area of the school.

#### *For detailed regulation see: 245.5(a)(1) Public Release*

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 a public release will be submitted for publishing at or near the beginning of each school year.			

#### Finding #12 Certification and Benefit Issuance

The SFA did not perform Direct Certification matches according to the required timeframes.

#### Technical Assistance

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. Recommend that the first match is done within the first months of school.

#### *For detailed regulation see: 245.6(b)(3) Application, eligibility and certification*

Required SFA Response	SFA Response	CNR Internal Use

Required SFA Response	SFA Response	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 will perform Direct Certification matches according to the required timeframes			

**Finding #13: Verification**

The SFA did not send a verification notification letter that included all of the correct information. A phone call was made.

**Technical Assistance**

During the review, the content of the verification notification letter was discussed with the SFA. In its notification letter, the SFA must include the information outlined in the Eligibility Manual for School Meals, Chapter 4. Recommend visiting the Wisconsin DPI website and researching verification. Templates are available each year for SFAs to use.

*For detailed regulation see: 245.6a(f) Verification 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 understanding that the SFA's verification notification letter must include the information outlined in the			
4. Provide a copy of the revised verification notification letter.			

**Finding #14: Verification**

Verification was not completed 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. Documentation of efforts to show timeline is met is required. Strongly recommend completing a verification training. The Wisconsin DPI website has a training page with verification trainings.

*For detailed regulation see: 245.6a(b) Deadline and extensions*

Required SFA Response	SFA Response	CNR Internal Use	
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Required SFA Response	SFA Response	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 #15: Professional Standards

The SFA has additional employees outside of the school nutrition program whose responsibilities include duties related to the operation of the school nutrition program who have not received applicable training.

### Technical Assistance

During the review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that employees outside of the School Nutrition programs (whose responsibilities include duties related to the operation of the School Nutrition program) receive adequate training specific to the task they perform. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

*For detailed regulation see: SP 39-2015: Question 29*

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 names, length, and date of trainings that have been completed/planned to meet the required training applicable to their duties in the program.			

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.