



Administrative Review Summary and Corrective Actions

SFA Name:	Peshtigo School District
SFA Code/ ID Number:	384305
Administrative Review Conducted on:	Tuesday, November 14, 2017

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on November 14, 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 12, 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,

Ahn Ei Sweeney, RD, SNS, Senior Vice President

CN Resource

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Administrative Review Technical Assistance Summary

SFA Name:	Peshtigo School District
SFA Code/ID Number:	384305
Administrative Review Conducted on:	Tuesday, November 14, 2017

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.
Thank you for completing the Paid Lunch Equity Tool each year and adhering to the pricing requirements for paid student lunches.
Outstanding job with the breakfast meal service in the classrooms, and educating staff on the process of accounting for meal counts.
Great Food Service staff. Very efficient way of serving the meals. Very clean and efficient facility.
Great job with the formulation of Local School Wellness Policy.
Great choices for breakfast and especially lunch.

Other areas of Technical Assistance (Does NOT require SFA Response)
<p>Resource Management - Nonprogram Food Revenue Tool</p> <p>The SFA should ensure the DPI NonProgram Food Revenue Tool is correctly completed every year. The SFA submitted a tool that did not include adult meals in the nonprogram food section. This was corrected during the review, and the SFA's tool showed they were in compliance with nonprogram food requirements.</p>
<p>Local School Wellness Policy - TA provided that once Wellness Policy assessment is completed that it be publicized.</p>
<p>Professional Standards - TA provided that SFA should utilize a consolidated tracking document to track professional standards training of all FNS staff employees.</p>
<p>Civil Rights - TA provided that SFA should have a written procedure that reflects that all complaints in the FNS School Meal Programs should be forwarded to either the State Agency, USDA Regional or National office.</p>
<p>Food Safety - TA provided that SFA should have on file a written request to proper local authority requesting two food safety inspections for each school year.</p>
<p>Recommend reducing the number of deli meats are offered at lunch as well as the frequency of grain based desserts are served for breakfast.</p>
<p>Recommend putting a copy of the And Justice for All poster on each delivery box/bag/cart for breakfast in the classroom.</p>
<p>During the review the SFA was informed that the confirming official may not also be the determining official. The SFA should review the current Income Eligibility Manual for additional verification requirements. The SFA was also reminded that the hearing official may not be the determining, confirming, nor the verifying official. Since there are 2 determining officials, each can review each others work acting as the confirming official for the other person for verification.</p>
<p>During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated once opened. Storage violations were observed on-site. The SFA had food that was opened and not dated with date opened.</p>

SFA Name: Peshtigo School District
 SFA Code/ID: 384305

Administrative Review Conducted: Tuesday, November 14, 2017
 Site(s) Selected for Review: Peshtigo Elementary School
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Date Corrective Action Plan was provided to SFA: 12/12/2017

Due Date for Corrective Action Plan: 1/12/2018

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:			
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. 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 \$3.55, but should have charged at least \$3.65 (\$3.00 student price + \$.37 federal reimbursement + \$.2325 value of commodities + \$.0482 state reimbursement). Adult breakfasts are priced at \$1.75, but the SFA should be charging at least \$1.78 (\$1.40 student price + \$.30 federal reimbursement + \$.08137 state reimbursement). 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.
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.			

Finding #2: Food Safety

The SFA did not request two health inspections for each school year.			
Technical Assistance			
During the review, health inspections were discussed with the SFA. The SFA must request two health inspections for each site for each school year and must maintain documentation of this request.			
<i>For detailed regulation see: 210.13(b) Food safety inspections.</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 has requested two health inspections for the current school year and will annually request two			
4. Provide a copy of the inspection request.			

Finding #3: School Breakfast and Summer Food Service Program Outreach

The SFA has not performed SFSP outreach.			
Technical Assistance			
<p>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:</p> <ul style="list-style-type: none"> •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 			
<i>For detailed regulation see: 210.12(d) Outreach activities. (2)</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 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. Not all applications included the amounts, source, and frequency of current income for each household

Technical Assistance

Complete applications must include the appropriate documentation. 245.2 Documentation means: (1) The completion of a free and reduced price school meal or free milk application which includes: (i) For households applying on the basis of income and household size, names of all household members; income received by each household member, identified by source of the income (such as earnings, wages, welfare, pensions, support payments, unemployment compensation, and social security and other cash income); the signature of an adult household member; and the last four digits of the social security number of the adult household member who signs the application or an indication that the adult does not possess a social security number.

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	
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Required Corrective Actions- Review Areas

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 income will not be annualized when it should be determined at its stated frequency (monthly, weekly, bi weekly, or 2 x per mo.)			

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.



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