



## Administrative Review Summary and Corrective Actions

SFA Name:	Our Lady Queen of Peace School
SFA Code/ ID Number:	407236
Administrative Review Conducted on:	Friday, March 2, 2018

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on March 2, 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 19, 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:	Our Lady Queen of Peace School
SFA Code/ID Number:	407236
Administrative Review Conducted on:	Friday, March 2, 2018

### Commendations & Suggestions

The Food Service Staff is very knowledgeable about the requirements for the Nation School Lunch Program. They enjoy working with the students and providing a great lunch.

There were no resource management findings. 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-TA provided, SFA must reach out to community members to allow them the opportunity to participate in the wellness policy activities. SFA reach out through e-mail or flyers

#### Resource Management - Financial Reporting

The SFA should ensure that all financial information submitted to the State Agency as part of their annual food service financial report (AFR) is reported accurately. The SFA's beginning fund balance for SY 16-17 did not match the ending balance per the SY 15-16 report. These numbers should always tie. The SFA discovered the discrepancy was due to an error on the SY 15-16 AFR. The SFA should ensure the ending balance for SY 16-17 is input as the beginning balance for SY 17-18's AFR. DPI's training on how to complete the report can be found under "Annual Food Service Financial Report" on DPI's financial website: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>

SFA Name:  
*Our Lady Queen of Peace School*

Site(s) Selected for Review:

1 <i>Our Lady Queen of Peace</i>	NSLP Grade Group: K-8	SBP Grade Group: K-8	<input type="checkbox"/> N/A
2 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
3 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A

SFA ID Number:  
407236

Week of Menu Review:  
1/8/18 - 1/12/18

**Menu Review Findings: Lunch**

**Site 1:**

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.
2. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the red/orange vegetable subgroup.
3. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the other vegetable subgroup.

**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 and red/orange and other vegetable subgroup requirements are 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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### 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. For breakfast, vegetables may be substituted for fruits, but the first two cups per week of any such substitution must be from the dark green, red/orange, beans/legumes, or other vegetable subgroups.

### 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 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.			

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Administrative Review Conducted: Friday, March 2, 2018  
 Site(s) Selected for Review: Our Lady Queen of Peace  
N/A  
N/A

Date Corrective Action Plan was provided to SFA: 3/19/2018

Due Date for Corrective Action Plan: 4/19/2018

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 SFA did not update benefit issuance documents accurately upon receipt of Direct Certification updates.			
Technical Assistance			
During the review, updating benefit issuance documents was discussed with the SFA. The SFA must update benefit issuance documents accurately upon receipt of Direct Certification updates, as soon as possible but no later than three operating days after the date the local educational agency receives the direct certification documentation.			
245.6(b)(6)(ii) 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 plan for how the point of service will always have the correct benefit information when there are updates through Direct Certification.			

Finding #2: Verification	
The confirming official may not also be the determining official.	
Technical Assistance	
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.	
245.6a(e)(1)(i) Confirmation	

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 confirming official will not also be the determining official.			
4. Provide the person(s) by position(s) who will be the determining official for all applications, the confirming official for verification, and the verifying official.			

### Finding #3: Verification

The SFA's verification process is not being conducted according to USDA guidelines. The SFA did not establish the sample pool accurately.

### Technical Assistance

During the review, establishing the sample pool was discussed with the SFA. The SFA must establish the sample pool exactly as described in the Eligibility Manual for School Meals, Chapter 4.

### Eligibility Manual, Chapter 4A

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 establish the sample pool for verification.			

### Finding #4: Meal Counting & Claiming

The SFA and SA claims do not match. The SFA has a non-systematic claiming error.

### Technical Assistance

During the review, claiming was discussed with the SFA. The SFA and State Agency claims do not match. The SFA has a non-systemic claiming error. To be in compliance, the SFA must ensure that claims are being filed accurately. The SFA must correctly consolidate the claim based on the edit checks from each site. The SFA acknowledged the finding and will implement needed changes immediately.

### 210.7(c)(1) Lunch count system.

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 explaining the error that led to the incorrect claims.			
4. Provide a process that will be implemented to ensure that all claims submitted for reimbursement are accurate.			

### Finding #5: 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 all Program materials.

#### 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.

#### *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 #6: 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 Procedure*

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 #7: Professional Standards**

No individual has been designated as food service director and the required training hours have not been complete

**Technical Assistance**

During the review, the SFA was informed that a director must be assigned and complete the required training hours as director. To be in compliance, the SFA must ensure that the School Nutrition Program Director completes the required amount of training annually. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

**210.30(b) Minimum standards for program directors.**

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 hours.			

**Finding #8: 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.			

**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 availability of the Summer Food Service Program.			

**Finding #10: Verification**

The SFA does not have documentation demonstrating that a confirmation review took place.

**Technical Assistance**

During the review, documenting the confirmation review was discussed with the SFA. The SFA must conduct confirmation reviews and maintain documentation that these took place.

*For detailed regulation see: 245.6a(e) Activities prior to household notification*

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 will complete a confirmation review on all applications that are selected for verification.			

**Finding #11:**

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

**Technical Assistance**

**Required Corrective Actions- Review Areas**

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. A second person is recommended to double check the edit check before the claim for reimbursement is submitted.

*For detailed regulation see: 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.			

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.



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