NUTRITION PROGRAMS SIMPLIFIED

Administrative Review Summary and Corrective Actions

SFA Name:	Gillett School District
SFA Code/ ID Number:	422128
Administrative Review Conducted on:	Wednesday, November 29, 2017

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on November 29, 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 **1/29/18**. 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:	Gillett School District
SFA Code/ID Number:	422128
Administrative Review Conducted on:	Wednesday, November 29, 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 both paid student lunches and adult meals.
Recommend that the SFA add more detail the required elements in the LEA wellness policy to tailor the policy to their district.

Other areas of Technical Assistance (Does NOT require SFA Response)
Certification and Benefit Issuance - During the review, documenting communication with households was discussed. The SFA should document any communication with households clarifying information on applications. This could be done on the application or through a mechanism of their choosing.
Verification - 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. The verifying and confirming officials should sign the application
Civil Rights - During the 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.
Local School Wellness Policy - During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to allow certain parties - parents, students, representatives of the school food authority, teachers of physical education, school health professions, the school board, school administrators, and the general public - to participate in the development, implementation, periodic review, and update of the Local Wellness Policy.
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 at least once every three years. The results of the assessment must be made available to the public.
Dietary Specifications - Technical assistance provided to the SFA to control portions with portion cups or portion control packaging or some other method of their choosing.
On-site Monitoring - During the review, the requirement for on-site monitoring was reviewed with the SFA. It was determined that the SFA is not completing on-site monitoring for all or some of the sites within the SFA. Since the SFA has multiple sites, they are required to monitor the lunch counting and claiming system for each site in the SFA prior to February 1st of each year. The SFA was provided with the link to the USDA memo that includes a sample monitoring form. If the SFA chooses to create their own monitoring form, at a minimum it must include all information that is on the USDA monitoring form. https://fns-prod.azureedge.net/sites/default/files/cn/SP56-2016os.pdf
Professional Standards - 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. The SFA tracker should be updated to include Key Topics and Key Areas.

During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated upon delivery.
During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated once opened.

SFA Name: Gillett School District

SFA Code/ID: 422128

Administrative Review Conducted: Wednesday, November 29, 2017

Site(s) Selected for Review: 0

0

0

Date Corrective Action Plan was provided to SFA: 12/29/2017

Due Date for Corrective Action Plan: 1/29/2018

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: Resource Management			
The SFA has not sufficiently priced its nonprogram foods to be in compliance with revenue from nonprogram food requirements.			
Technical Assistance			
The SFA did not complete the NonProgram Food Revenue Tool prior to the review. During the review, the SFA completed the tool and it showed the SFA was out of compliance. The SFA forgot to include adult meals as part of nonprogram foods. The reviewer was able to revise the tool to include adult meals, which lowered the amount by which the SFA was out of compliance. The SFA needed $43 in additional nonprogram revenue to be in compliance, which comes to an annual deficiency of approximately $1,548. The NonProgram Food Revenue Tool must be completed every year, and nonprogram food prices increased if the tool shows the SFA did not price its nonprogram foods at a sufficient rate to ensure its revenue ratio equaled or exceeded its food cost ratio. If nonprogram food prices will not be increased, the SFA should transfer nonfederal funds into the food service account. This would be reported under the "Transfer from Non-Food Service Account- NonProgram Food Revenue" column on the annual financial report.			
For detailed regulation see: 210.14(f) Revenue from nonprogram foods.			
Required SFA Response	SFA Response	*CNR Internal Use*	
		Appv.	*Intls.*
1. List the steps the SFA will take to increase nonprogram food revenues. This should include the specific price increases and the date the increases will take effect.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			

3. Provide a written statement of understanding that the DPI Nonprogram Food Revenue Tool will be completed each year. This should include a timeframe for when the tool will be completed and assurance that the SFA will take the necessary steps to come into compliance if the tool shows they did not generate sufficient nonfederal revenue.			

Finding #2: 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 #3: 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 #4: Meal Counting and Claiming			
The SFA has claimed meals in error based on a clerical error. The counts by category were not correctly used in the claim for reimbursement. This is a non-systemic error.			
Technical Assistance			
During the review, counting and claiming were discussed with the SFA. The counts by category were not correctly used in the claim for reimbursement. To be in compliance, the SFA must ensure that meal counts are being recorded accurately and that claims are being filed correctly. Proper counting and claiming procedures were reviewed with the SFA. The SFA acknowledged the finding and will implement needed changes immediately.			
For detailed regulation see: 210.7(c) Reimbursement limitations.			
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 detailed explanation of the new/revised process that will be implemented at the point of service to ensure an accurate counting and claiming system.			

Finding #5: Smart Snacks			
The SFA is selling items that do not meet the Smart Snacks nutrition standards for foods during the school day, with regard to the General Standard for Competitive Food.			
Technical Assistance			
During the review, Smart Snacks nutrition standards were discussed with the SFA. The SFA must ensure that all competitive items sold meet the general standard for competitive foods. The SFA should review Smart Snack requirements online at: http://www.fns.usda.gov/healthierschoolday/tools-schools-focusing-smart-snacks			
For detailed regulation see: 210.11 (c) General nutrition standards for competitive foods.			
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 ensure that all items sold to students during the day meet Smart Snacks nutrition standards.			

Finding #6: 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.
For detailed regulation see: 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.			

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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