



Administrative Review Summary and Corrective Actions

SFA Name:	Lena Public School District
SFA Code/ ID Number:	422961
Administrative Review Conducted on:	Thursday, November 16, 2017

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on November 16, 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 15, 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,

CN Resource
1930 N Arboleda, 101, Mesa, Arizona 85213
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Administrative Review Technical Assistance Summary

SFA Name:	Lena Public School District
SFA Code/ID Number:	422961
Administrative Review Conducted on:	Thursday, November 16, 2017

Commendations & Suggestions
Outstanding job meeting all of the requirements for the breakfast and lunch menus. All daily and weekly meal component and food quantity requirements were met for the week of menu review.
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.
Great job in the cafeteria serving multiple age groups at the same time for breakfast.
Nice clean facility.
Great job in the cafeteria serving multiple age groups at the same time for breakfast.
Great job in meal counting and claiming.

Other areas of Technical Assistance (Does NOT require SFA Response)
<p>Resource Management - NonProgram Food Revenue Tool</p> <p>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 in compliance. The NonProgram Food Revenue Tool must be completed every year, and nonprogram food prices increased if the tool shows noncompliance.</p>
<p>Civil Rights - One non-FNS staff member had not completed Civil Rights training. TA provided that any non-FNS staff members who have front-line interaction with the Food Program should complete the Civil Rights training.</p>
<p>Local Wellness Policies were discussed with the SFA. TA provided that 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.</p>
<p>Local Wellness Policies were discussed with the SFA. TA provided that the SFA must make stakeholders and the general public aware of their right to participate in the development, implementation, periodic review, and update of the Local Wellness Policy.</p>
<p>Local Wellness Policies were discussed with the SFA. TA provided that 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</p>
<p>Local School Wellness Policy - TA provided that once an assessment of the implementation of the Local School Wellness Policy is completed, it needs to be publicized to SFA stakeholders.</p>
<p>The SFA should maintain all CN labels or crediting information for the food served.</p>
<p>During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is stored at least six (6) inches off the floor.</p>
<p>During the review, health inspections were discussed with the SFA. The SFA must post a copy of the most recent food safety inspection in a publicly visible location at the site.</p>

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

SFA Name: Lena Public School District
 SFA Code/ID: 422961

Administrative Review Conducted: Thursday, November 16, 2017
 Site(s) Selected for Review: Lena High School
#REF!
#REF!

Date Corrective Action Plan was provided to SFA: 12/15/2017

Due Date for Corrective Action Plan: 1/15/2018

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: 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.			
For detailed regulation see: 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 #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.

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 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 has a procedure in place for handling civil rights complaints, but the procedure does not indicate that whether an allegation is made verbally or in person, the person receiving the allegation must transcribe the complaint

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

Finding #4: Local School Wellness Policy

The SFAs Local Wellness Policy does not contain all of the required components. The Wellness Policy does not include goals for nutrition promotion. The Wellness Policy does not include goals for other school-based activities to promote student wellness. The Wellness Policy calls for an update once every five years.

Technical Assistance

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. The SFA was provided with the USDA link for Wellness Policies.
<http://www.fns.usda.gov/tn/local-school-wellness-policy>

For detailed regulation see: 210.31 Local school wellness policy

Required Corrective Actions- Review Areas

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 copy of the completed Local Wellness Policy			
4. If the SFA needs more time to finish the Local Wellness Policy, provide a timeline for when parts of the plan will be completed.			

Finding #5: Professional Standards

The School Nutrition Program Director did not meet the training requirements, and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements.

Technical Assistance

During the review, annual training hour requirements were discussed with the SFA. 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.

For detailed regulation see: 210.30(b)(3) Continuing education/training 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 #6: Professional Standards

The school nutrition staff did not meet the training requirements, and did not have scheduled/planned trainings for the remainder of the school year to meet annual training requirements.

Technical Assistance

During the review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that the School Nutrition staff complete the required amount of training annually. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

For detailed regulation see: 210.30(d) Continuing education/training standards for all staff

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 #7: School Breakfast and Summer Food Service Program 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. 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:

- 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

For detailed regulation see: 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 #8: 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 member. Not all applications included the names of all household members.

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.			

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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