



Administrative Review Summary and Corrective Actions

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| SFA Name: | Oconto Unified School District |
| SFA Code/ ID Number: | 424067 |
| Administrative Review Conducted on: | Wednesday, November 15, 2017 |

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on November 15, 2017; an exit conference summarizing the findings took place on the same day of exit conference.

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 13, 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

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Administrative Review Technical Assistance Summary

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|-------------------------------------|--------------------------------|
| SFA Name: | Oconto Unified School District |
| SFA Code/ID Number: | 424067 |
| Administrative Review Conducted on: | Wednesday, November 15, 2017 |

| Commendations & Suggestions |
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| 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. |
| Outstanding job with Direct Certification documentation. |
| Outstanding job with meal service. Outstanding POS. |
| Nice variety of food choices for each meal. |

| Other areas of Technical Assistance (Does NOT require SFA Response) |
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| <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>Local School Wellness Policy - after the Wellness Policy is updated to reflect public's ability to participate in the reviewing and updating of the Wellness Policy, SFA will make potential stakeholders aware of their ability to participate in this process.</p> |
| <p>Local School Wellness Policy - Technical assistance provided that the SFA must complete an annual assessment at least once every three (3) years.</p> |
| <p>Local School Wellness Policy - Once the SFA has completed an assessment on the implementation of the Wellness Policy, it must be made available to the public.</p> |
| <p>Professional Standards - SFA needs to utilize a consolidated tracking document to track Professional Standards training taken and/or needed to be completed and when for FNS Staff members. It is recommended that the SFA use the DPI created excel tracker.</p> |
| <p>Meal Counting and Claiming - Technical assistance provided to confirm meal count numbers prior to submission of claim, especially if manual corrections were made during the month.</p> |
| <p>On-site Monitoring - Technical assistance provided that SFA must conduct on-site monitoring of both breakfast and lunch service at all sites prior to February 1st of the current school year.</p> |
| <p>Food Safety - 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> |

SFA Name: Oconto Unified School District
 SFA Code/ID: 424067

Administrative Review Conducted: Wednesday, November 15, 2017
 Site(s) Selected for Review: Oconto High School
N/A
N/A

Date Corrective Action Plan was provided to SFA: 12/13/2017

Due Date for Corrective Action Plan: 1/13/2018

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: 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 does not include information on the public's ability to participate. | | | |
| 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 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 #2: 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 sugar.

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 requirements for sugar. 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 (h) Total sugars.

| 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 #3: 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 | |
|---------------------------------------------------------------------------------------------------------------------------------|--------------|------------------|--------|
| | | 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 | | | |
| 4. Provide a written statement that all food items are dated with the date the product was opened. | | | |

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 member.

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: Food Safety

The SFA does not have documentation to show that they requested the two required health inspections from the applicable agency per 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.

For detailed regulation see: 210.13(b) Food safety inspections.

| 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 | | | |

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|----------------------------------------------|--|--|--|
| 4. Provide a copy of the inspection request. | | | |
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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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