



Administrative Review Summary and Corrective Actions

SFA Name:	Suring Public School District
SFA Code/ ID Number:	425670
Administrative Review Conducted on:	Tuesday, November 28, 2017

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on November 28, 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 **1/28/18**. 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

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Administrative Review Conducted on:	Tuesday, November 28, 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.
There were no resource management findings. Thank you for completing the Paid Lunch Equity Tool each year and making the appropriate nonfederal fund transfer for paid lunch support.
Kitchen is very clean and organized.
The SFA was open to all feedback and willing to make any needed changes.

Other areas of Technical Assistance (Does NOT require SFA Response)
<p>Resource Management - Nonprogram Food Revenue Tool</p> <p>The SFA made an error on their Nonprogram Food Revenue Tool. The selling prices + USDA reimbursements for the program foods section were incorrect. The SFA should use their current price + USDA reimbursement for each category. The rates were updated by the reviewer, and a revised copy of the tool was sent to the SFA. The mistake did not affect the SFA's compliance with nonprogram foods. Updated reimbursement rates can be found on DPI's Financial Management website: https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial</p>
<p>Certification and Benefit Issuance - During the review, processing applications timely was discussed with the SFA. The SFA must process applications within 10 operating days of receiving the application from the household. The 10 day period applies to complete applications. If the SFA receives an application that is missing any required information, they should contact the household and try to obtain the missing information. Once an application is complete the SFA has 10 operating days to process the application and notify the household of the eligibility status.</p>
<p>Certification and Benefit Issuance - During the review, documenting extended eligibility was discussed with the SFA. Per USDA the SFA must make an effort, to the extent possible, to identify additional children in the same household of those certified for assistance program benefits. The SFA must base extended eligibility on allowable records as outlined in USDA memo SP 25-2010. The SFA must maintain documentation for extended eligibility, the SFA may use a variety of methods to maintain this documentation. Some SFAs, write the name of the student that the benefits are extended to next to the student from the same household on the direct certification list. In this case the SFA should document the date added, the SFA representative's signature or initials with the name of the added student. Other SFAs maintain a consolidated list of students that have been extended eligibility, in this case the list includes: the name of the student, the name of the student that eligibility is extended through, and the date added. The list should have the name of the SFA representative that determined the extended eligibility.</p>
<p>Certification and Benefit Issuance - During the review, updating the point of service benefit issuance document was discussed with the SFA. When eligibility changes, the SFA must make these updates in a timely manner. When there is an increase in benefits the SFA should make the change immediately, if there is a decrease or termination in benefits the household should be provided 10 days of adverse action before the status is changed.</p>
<p>Verification - During the review, the verification pull sample size was discussed. The SFA must pull the sample size from a pool of applications approved based on categorically eligible and income. The number of applications on file for each category must be correctly entered on the FNS-742.</p>
<p>Verification - During the review, completing verification was reviewed with the SFA. The verifying official must sign off on the application as documentation that verification was completed on the application selected.</p>

<p>Verification - During the on-site review, documenting follow-up attempts was discussed with the SFA. The SFA must make and document at least one follow-up attempt.</p>
<p>Meal Counting and Claiming - During the review, accurate meal counts were discussed with the SFA. Meal count totals by category have not been combined correctly. This is a non-systematic error. The should use the meal consolidation numbers from the edit check report for the monthly claim. The SFA acknowledged the finding and will implement needed changes immediately.</p>
<p>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.</p>
<p>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. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.</p>
<p>Buy American - During the review, Buy American requirements were discussed with the SFA. SFAs must review products and delivery invoices or receipts to ensure that the domestic food that was solicited and awarded is the food that is received.</p>
<p>Dietary Specifications - During the review, controlling portion sizes of condiments was discussed. The SFA should use some sort of portion control, such as portion cups or packets, to control the amount of condiments student take.</p>
<p>Afterschool Snack Program - During the review, the requirements for properly counting and claiming snacks were discussed with the SFA. The SFA must ensure that the claim for reimbursement is an accurate count of snacks for the month.</p>
<p>Afterschool Snack Program - During the review, production record, component, and portion size requirements were discussed with the SFA. The SFA must complete production records and serve snacks as described in 7 CFR 210.10(a)(3) and 7 CFR 210.10(o)(2).</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. Storage violations were observed on-site. The SFA had food that was opened and not dated with date opened.</p>

SFA Name: Suring Public School District
 SFA Code/ID: 425670

Administrative Review Conducted: Tuesday, November 28, 2017
 Site(s) Selected for Review: 0
0
0

Date Corrective Action Plan was provided to SFA: 12/28/2017

Due Date for Corrective Action Plan: 1/28/2018

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			
Not all selected applications were approved correctly. Not all applications included the names of all household members. Not all selected applications were approved correctly. The SFA did not base its determination on all sources of income listed on the application. The SFA approved a student for free benefits based on income and an application was not maintained on file.			
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.			
During the review, determining applications was discussed with the SFA. When determining eligibility, the SFA must ensure that the household has listed the amounts, source, and frequency of current income for each household member; otherwise, the application is incomplete. For more information, see the Eligibility Manual for School Meals, Chapter 3. When determining the total household income the SFA must use all income provided on the application.			
<i>For detailed regulation see: Eligibility Manual, Chapter 3: Establishing Eligibility 245.6(c)(4) Application, eligibility and certification of children for free and reduced price meals and free milk</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 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 #2:

Not all direct certifications were correctly certified. The direction certification list did not include the names of all students who were marked as categorically free based on direct certification.

Technical Assistance

During the review, direct certification was discussed with the SFA. The SFA may not determine students as categorically free based on direct certification if their names are not included on the appropriate direct certification list/documentation.

For detailed regulation see: SP 25-2010: Q&A Extending Categorical 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 of understanding that the direct certification list will include the full name of all students who were marked as categorically free based on direct certification.			

Finding #3: 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 #4: Verification

The applications subject to verification were not properly selected in accordance with the standard sample used, the SFA did not select from error prone applications.

Technical Assistance

During the review, selecting applications was discussed with the SFA. The SFA selected from error prone applications

For detailed regulation see: 245.6(c)(3)(i) Error prone application

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 when selecting error prone applications for verification.			

Finding #5: Meal Counting and Claiming

The SFA is not claiming meals served during field trips properly because the count is not taken at the point of service.

Technical Assistance

During the review, claiming meals during field trips was discussed with the SFA. The SFA is not claiming meals served during field trips properly because the count is not taken at the point of service. To be in compliance, the SFA must ensure that meals served during field trips are claimed based on accurate counts taken at the point of service. The SFA acknowledged the finding and will implement needed changes immediately.

For detailed regulation see: 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 that includes: a statement that the SFA will properly claim field trips meals based on the point of service and a description of the process that will be used as the point of service for all field trips.			

Finding #6: 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 #7: Smart Snacks

The SFA is selling items that do not meet the Smart Snacks nutrition standards for beverages sold to elementary and high school students during the school day. 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, beverage rules under Smart Snacks were discussed with the SFA. The SFA must ensure that all beverages meet the requirements, based on the level of the school (elementary and high) where they are sold.

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 (m)(1) Elementary school
210.11 (m)(3) High school
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 #8: Professional Standards

The SFA has additional employees outside of the school nutrition program whose responsibilities include duties related to the operation of the school nutrition program who have not received applicable training.

Technical Assistance

During the review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that employees outside of the School Nutrition programs (whose responsibilities include duties related to the operation of the School Nutrition program) receive adequate training specific to the task they perform. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

For detailed regulation see: SP 39-2015: Question 29

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 applicable to their			

Finding #9: Afterschool Snack Program

Snacks have not been properly counted and claimed. Not all snacks counted/claimed were reimbursable. Several students only took one component and were counted as taking a reimbursable meal.

Technical Assistance

During the review, the requirements for properly counting and claiming snacks were discussed with the SFA. The SFA must count and claim only snacks that are reimbursable. The afterschool snack meal pattern was discussed with the SFA and how to identify reimbursable snacks. This finding may result in fiscal action.

For detailed regulation see: 210.10(o)(2) Afterschool snacks

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 follow proper counting and claiming methods for snacks.			
4. Provide meal count sheets for the month of December for Suring high school.			

Finding #9: Meal Counting and Claiming

The SFA has claimed meals in error based on inaccurate counting and/or claiming procedures. The counts by category were not correctly used in the claim for reimbursement.

Technical Assistance

During the review, counting and claiming were discussed with the SFA. The SFA has claimed meals in error based on inaccurate counting and/or claiming procedures. 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			

Finding #10: Food Safety

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:

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.



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