



Administrative Review Summary and Corrective Actions

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| SFA Name: | Prentice School District |
| SFA Code/ ID Number: | 504571 |
| Administrative Review Conducted on: | April 3,2018 |

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on April 3,2018 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 **May 18, 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.

Administrative Review Technical Assistance Summary

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|-------------------------------------|--------------------------|
| SFA Name: | Prentice School District |
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| Administrative Review Conducted on: | April 3,2018 |

Commendations & Suggestions

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.

All staff do an excellent job providing a great lunch for the students at Prentice School District. The atmosphere in the cafeteria is very relaxed and caring.

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- technical assistance was provided , it was discussed that the SFA should provide a translator if needed in the District.

SFA Name:
Prentice School District
 SFA ID Number:
504571
 Week of Menu Review:
2/12/18 - 2/16/18

Site(s) Selected for Review:
1 Prentice Elementary NSLP Grade Group: K-5 SBP Grade Group: K-12 N/A

Menu Review Findings: Lunch

1. For the week of menu review, not all grains offered at lunch were whole grain-rich. This contributed to not meeting the following requirements: daily grain, weekly grain, and whole grain-rich.
2. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the beans/legumes 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 grain, weekly grain, and beans/legumes 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. | | | |

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| 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

1. For the week of menu review, not all grains offered at breakfast were whole grain-rich. This contributed to not meeting the following requirements: daily grain and whole grain-rich.

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 daily grain and whole grain-rich 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. | | | |

SFA Name: Prentice School District
 SFA Code/ID: 504571

Administrative Review Conducted: April 3, 2018
 Site(s) Selected for Review: Prentice Elementary

Date Corrective Action Plan was provided to SFA: 4/18/2018

Due Date for Corrective Action Plan: 5/18/2018

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: 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. | | | |
| 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 #2: Wellness Policy | | | |
|---|--------------|------------------|--------|
| An assessment of the Local School Wellness Policy has not been completed. | | | |
| Technical Assistance | | | |
| 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 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. | | | |
| 210.31(e) 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 assessment of the wellness policy. | | | |

Finding #3: Professional Standards

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

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 #4: Water

Free potable water is not available to students for lunch and for breakfast.

Technical Assistance

During the review, the requirements for potable water were discussed with the SFA. It was determined that free potable water is not available to students for lunch and breakfast. To be in compliance, the school must ensure that free potable water is made available to students during the meal service wherever meals are served, without restriction.

210.10(a)(1)(i) Requirements for lunch and 220.8(a)(1) General nutrition requirements.

| 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 the process that will be implemented to ensure that all student have access to water during the meal period. | | | |

| Finding #5: 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). Mandarin Oranges/ Pineapple Tidbits | | | |
| 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). | | | |
| 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. Mandarin Oranges/ Pineapple Tidbits | | | |
| 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
 CN Resource
 P.O. Box 31060