



Administrative Review Summary and Corrective Actions

SFA Name:	Edgerton School District
SFA Code/ ID Number:	531568
Administrative Review Conducted on:	Thursday, April 12, 2018

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on April 12, 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 25, 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,

Ahn Ei Sweeney, RD, SNS, Senior Vice President

CN Resource

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Administrative Review Technical Assistance Summary

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Commendations & Suggestions

Outstanding job meeting all of the requirements for breakfast. All daily and weekly meal component and food quantity requirements were met for the week of menu review for the breakfast menu.

Excellent work meeting the whole grain-rich requirement 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.

Food Service Staff at Edgerton Middle School do a Great job providing lunch to their students. Pete has worked well with all staff members. Taher is a great resource for Pete to be able to do a Great job.

The District has supported a joint effort with Taher to make sure that the needs of the students in Edgerton School District are met.

Other areas of Technical Assistance (Does NOT require SFA Response)

Menu Review- technical assistance was provided in an email to the SFA with the lunch menu review results. Suggestions were provided to bring the menus into compliance.

Resource Management - The SFA should ensure that all financial information submitted to the State Agency as part of their annual food service financial report (AFR) is reported accurately. The SFA's beginning fund balance for SY 16-17 does not match the ending balance per the SY 15-16 report. These numbers should always tie. The discrepancy is due to errors on the previous years' reports, as the SY 16-17 report was completed correctly. The SFA should input the ending balance for SY 16-17 as the beginning balance for SY 17-18's Child Nutrition Program report. DPI's training on how to complete the report can be found under "Annual Food Service Financial Report" on DPI's financial website: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>)

On Site Review- technical assistance provided SFA should always send a roster for teacher to check off as students take lunch on field trips.

SFA Name: <i>Edgerton School District</i>	Site(s) Selected for Review: 1 <i>Edgerton Middle School</i>	NSLP Grade Group: 6-8	SBP Grade Group: 6-8	<input type="checkbox"/> N/A
SFA ID Number: 531568	2 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A
Week of Menu Review: <u>3/12/18 - 3/16/18</u>	3 <i>N/A</i>	NSLP Grade Group:	SBP Grade Group:	<input type="checkbox"/> N/A

Menu Review Findings: Lunch

Site 1:
For the week of menu review, the lunch menu did not meet the minimum weekly requirement for meat/meat alternate. A meat/meat alternate was offered daily, however the weekly minimum requirement was not met.

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 weekly meat/meat alternate requirement is 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.			

Required Corrective Actions- Menu Review

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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Administrative Review Conducted: Thursday, April 12, 2018
 Site(s) Selected for Review: Edgerton Middle School
N/A
N/A

Date Corrective Action Plan was provided to SFA: 4/25/2018

Due Date for Corrective Action Plan: 5/25/2018

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: On Site Monitoring	
On-site monitoring was not completed for all or some of the sites within the SFA for breakfast and lunch .	
Technical Assistance	
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	

Required Corrective Actions- Review Areas

<i>210.8(a)(1) On-site reviews and 220.11(d)(1) On-site reviews</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 written statement that all on-site monitoring will be completed for all sites by February 1, each year moving forward.			
4. Provide the on-site monitoring forms that have been completed for the current school year.			

Finding #3: Professional Standards			
The SFA is not tracking training hours.			
Technical Assistance			
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.			
<i>210.30(g) School food authority oversight.</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 of understanding that the SFA must track the hours of training completed by all School Nutrition staff.			
4. Provide a copy of the tracker that will be used by the SFA.			

Finding #4: 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.			
<i>210.21(d) Buy American</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 written statement that the SFA understands the Buy American provision. As part of the statement, the SFA must state that			
4. Provide documentation justifying the limited exception(s) for the noncompliant food items that were identified during the review.			

Finding #5: Verification

The determining official may not also be the confirming official.

Technical Assistance

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 #6: 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.

Required Corrective Actions- Review Areas

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.			

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.

Signature of SFA Representative: _____

Date: _____

Signature of CN Resource Reviewer: _____

Date: April 17,2018

If you have any questions, feel free to contact CN Resource at your convenience. Thank you.



Administrative Review Team
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