NUTRITION
PROGRAMS
SIMPLIFIED

Administrative Review Summary and Corrective Actions

SFA Name:	Shawano School District
SFA Code/ ID Number:	585264
Administrative Review Conducted on:	November 30,2017

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on November 30,2017an exit conference summarizing the findings took place on December 1,2017

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 **1/29/18.** 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

SFA Name:	Shawano School District
SFA Code/ID Number:	585264
Administrative Review Conducted on:	November 30,2017

Commendations & Suggestions
Great job meeting the whole grain-rich requirement for breakfast and lunch for the week of menu review.
SFA does a great job in all aspects of serving nutritious meals to students. SFA should apply for HealthierUS Challenge.
Staff knowledgable of program requirements. Friendly and helpful with students.

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.
Menu Review- A Child Nutrition (CN) Label or Product Formulation Statement (PFS) is not available for all processed entrée food components. Therefore, we are unable to determine if the meal pattern requirements are met on 1 day. Choose a product that has either a Child Nutrition (CN) Label or Product Formulation Statement (PFS) in order to determine meal pattern crediting. A Child Nutrition label or Product Formulation Statement can be used to determine how processed food items contribute to the meal pattern. Without this documentation it may be difficult to determine if the meal component was satisfied. Products on your menu that are missing a Child Nutrition label or Product Formulation Statement include: -Morningstar Vegetable Burger
Resource Management - Nonprogram Food Revenue Tool The SFA did not complete the NonProgram Food Revenue Tool prior to the review. During the review, the SFA completed the tool but was asked to revise the tool due to errors. The SFA used the incorrect paid lunch price, did not include all reimbursable meals in the "number sold" column, and did not include the vended meals sold to Gresham. The SFA's revised tool 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. If the SFA needs additional training on completing the tool, a webinar can be found on the DPI website: https://media.dpi.wi.gov/school-nutrition/nonprogram-food-revenues/story_html5.html
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. The SFA must make the assessment available to the public once it has been completed.
During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated upon delivery.

Required Corrective Actions- Menu Review

SFA Name:
Shawano School District
SFA ID Number:
585264
Week of Menu Review:
10/2/17 - 10/6/17

Site(s) Selected for Review:

1	*Shawano Community High*	NSLP Grade Group: 9-12	SBP Grade Group: 9-12	☐ N/A
2	*N/A*	NSLP Grade Group:	SBP Grade Group:	☐ N/A
3	*N/A*	NSLP Grade Group:	SBP Grade Group:	☐ N/A

Menu Review Findings: Lunch

Site 1:

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

2. For the week of menu review, the lunch menu did not meet the minimum daily and weekly requirements for grain. A grain was offered daily, however the minimum daily and weekly requirements were 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 all menus will be reviewed to ensure that all components are offered in at least the minimum amount required to meet the daily and weekly requirements.			
2. 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.			
3. Provide a written statement that the serving line will be visually reviewed prior to service to confirm that all required components are available.			
4. Submit the position title(s) of the SFA representative(s) that will oversee this area and ensure future compliance.			
5. Submit 1 week of menus and production records that indicate all menu items, the portion size and the component contribution for each item.			

6. Provide labels, ingredient lists, CN labels, product formulation statements, and revised or new recipes as needed for any items that have been added to the menu, if they have replaced an item, indicate the item that it replaced.			

Menu Review Findings: Breakfast
For the week of menu review, the breakfast menu did not meet the minimum daily and weekly requirements for grain. A grain was offered daily, however the weekly minimum requirement was not met. Meat/meat alternate products may credit towards the weekly grain requirement, once the daily grain requirement is 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 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 statement that all menus will be reviewed to ensure that all components are offered in at least the minimum amount required to meet the daily and weekly requirements as applicable.			
2. Provide a written process for sites to reference when they do not have one of the planned menu items or there are insufficient quantities on the serving day.			
3. Provide a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available.			
4. Submit the position title(s) of the SFA representative(s) that will oversee this area and ensure future compliance.			
5. Submit 1 week of menus and production records that indicate all menu items, the portion size and the component contribution for each item.			
6. Provide labels, ingredient lists, CN labels, Product formulation statements, and revised or new recipes as needed for any items that have been added to the menu, if they have replaced an item, indicate the item that it replaced.			

Required Corrective Actions- Review Areas

SFA Name: Shawano School District

SFA Code/ID: 585264

Administrative Review Conducted: November 30,2017

Site(s) Selected for Review: Shawano Community High

N/A

N/A

Date Corrective Action Plan was provided to SFA: 12/29/2017

Due Date for Corrective Action Plan: 1/29/2018

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:
The SFA's adult meal price is not in compliance with FNS Instruction 782-5, Rev. 1.
Technical Assistance
The SFA has priced some of their adult meals below the cost of producing these meals. Adult meals should be priced at least at the student price plus per-meal reimbursements and the value of commodities received. Since the SFA has tiered prices for reimbursable meals (grill station, premium meals, salads, sandwiches, etc.), the SFA should tier their adult meal prices for these different options. An adult is charged $3.20 for their meal, but students are charged a range between $2.30 and $3.80. This results in a student paying more for a premium meal ($3.80) than an adult ($3.20). The adult price of $3.20 is also not sufficient for the grill station/salad meal (student price of $2.80). To calculate the adult meal pricing requirement, the SFA should take the student price and add the $.39 federal reimbursement + $.2325 value of commodities + $.0482 state reimbursement. If the SFA does not want to charge adults different prices based on their meal option, all adult meals should be priced based on the highest student price, which would be a requirement price of $4.47. The DPI Adult Meal Memo, updated reimbursement rates, and the value of commodities can be found on DPI's Financial Management website: https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial
For detailed regulation see: FNS Instruction 782-5, Rev. 1

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. This should include documentation showing the new adult meal price.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			

3. Provide a written statement outlining the SFA's adult meal pricing policy. This policy should establish guidelines for an annual reassessment of adult meal prices in line with FNS Instruction 782-5.			
4. Revise the adult meal price in your DPI contract.			

Finding #2:Certification and Benefit Issuance
The SFA's software 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.

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			

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
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