NUTRITION PROGRAMS SIMPLIFIED

Administrative Review Summary and Corrective Actions

SFA Name:	Webster School District
SFA Code/ ID Number:	76293
Administrative Review Conducted on:	Tuesday, November 14, 2017

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on November 14, 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 January 7, 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
1930 N Arboleda, 101, Mesa, Arizona 85213
p 866 941.6368 f 480 325.9967

Administrative Review Technical Assistance Summary

SFA Name:	Webster School District
SFA Code/ID Number:	76293
Administrative Review Conducted on:	Tuesday, November 14, 2017

Commendations & Suggestions
Great 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.
The staff was very friendly and accommodating.
The staff was well prepared for this review.

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.
Resource Management - Adult Meal Prices The SFA misreported the adult breakfast price in their DPI contract. The SFA reported a price of $1.80, but provided documentation during the review showing that the actual adult breakfast price is $1.90. The SFA should revise their contract with the correct price, and ensure they carefully report prices to DPI in the future.
Local Wellness Policy - During the review, Local Wellness Policies were discussed with the SFA. The SFA is required to allow certain parties - parents, students, representatives of the school food authority, teachers of physical education, school health professions, the school board, school administrators, and the general public - to participate in the development, implementation, periodic review, and update of the Local Wellness Policy.
Local 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.
Civil Rights - During the on-site review the requirement to provide a yearly civil rights training was discussed with the SFA. The SFA must provide civil rights training at least once a year to all frontline staff and supervisor and maintain all required documentation.
Professional Standards - During the review, training requirements were discussed with the SFA. To be in compliance, the SFA must ensure that the School Nutrition staff complete the required amount of training annually. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.
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.

Required Corrective Actions- Menu Review

SFA Name:
Webster School District
SFA ID Number:
76293
Week of Menu Review:
10/2/17 - 10/6/17

Site(s) Selected for Review:

1	*Webster Elementary*	NSLP Grade Group: K-5	SBP Grade Group: K-5
2	*N/A*	NSLP Grade Group:	SBP Grade Group:
3	*N/A*	NSLP Grade Group:	SBP Grade Group:

Menu Review Findings: Lunch

Site 1:

1. For the week of menu review, the lunch menu did not meet the minimum daily vegetable requirement. Vegetables were offered daily, however the minimum required portion size was not met.
2. For the week of menu review, the lunch menu did not meet the minimum weekly requirement for the red/orange vegetable subgroup.
3. 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 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 1 ounce equivalent requirement for grain. A grain was offered daily, however the minimum required portion size 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 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: Webster School District

SFA Code/ID: 76293

Administrative Review Conducted: Tuesday, November 14, 2017

Site(s) Selected for Review: Webster Elementary

N/A

N/A

Date Corrective Action Plan was provided to SFA: 12/7/2017

Due Date for Corrective Action Plan: 1/7/2018

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 must use the current civil rights statement on all Program materials. The SFA is not using the civil rights statement on all Program materials.
Technical Assistance
During the review the requirement for the most current civil rights statement to appear on all Program material was discussed with the SFA. The SFA must use the most current statement on all Program material. Per USDA requirements the new Non-discrimination statement must be on all program materials no later than September 30, 2016. The SFA was provided with the USDA link to the new non-discrimination statement. http://www.fns.usda.gov/fns-nondiscrimination-statement
For detailed regulation see: FNS Instruction 113-1 IX A 3 Nondiscrimination Statement.

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 non-discrimination statement has been added to all nutrition program materials.			
4. Provide an example to show that the non-discrimination statement has been added. Ex: any letter to the household.			

Finding #2: SFA 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.

For detailed regulation see: 210.8(a)(1) On-site reviews and 220.11(d)(1)On-site reviews

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: Local Wellness Policy

The SFAs Local Wellness Policy does not contain all of the required components. The Wellness Policy does not include : Foods sold outside of school meals program; Nutrition Education; Physical Activity; Other School-Based Strategies for Wellness; Triennial Assessment

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.			

☐ 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.