



Administrative Review Summary and Corrective Actions

SFA Name:	Northwest Passage LTD
SFA Code/ ID Number:	79153
Administrative Review Conducted on:	Thursday, November 16, 2017

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on November 16, 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 15, 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,

CN Resource
1930 N Arboleda, 101, Mesa, Arizona 85213
p 866 941.6368 f 480 325.9967

Administrative Review Technical Assistance Summary

SFA Name:	Northwest Passage LTD
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Administrative Review Conducted on:	Thursday, November 16, 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.

Very well prepared for the onsite review. They had all the requested documentation available to be reviewed.

The students were very polite and well-behaved.

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

Resource Management - Nonprogram Foods

The SFA should track the number of non-reimbursable student meals (dinners and weekend meals) served, as well as the number of adult dinners and weekend adult meals served. The SFA is required to ensure that sufficient nonfederal funds are transferred into the food service account to support these non-reimbursable meals. This should be documented annually by taking the total number of non-reimbursable breakfasts, lunches, and dinners served to both students and adults and multiplying these numbers by the rate for each meal. If the total nonfederal fund transfer made to cover the deficit in the food service program is larger than the total cost of these non-reimbursable meals, the SFA is in compliance. The rate for non-reimbursable breakfasts, lunches, and dinners should be the entire cost of these meals, including both food and labor. If the SFA cannot easily calculate a per-meal cost, the SFA should use the free student USDA reimbursement rate + state reimbursement rate + value of commodities, in accordance with DPI's Adult Meal Pricing guidelines. For breakfast this would be \$2.17, and for lunch this would be \$3.59 for SY 17-18. Assuming dinners are a similar cost to lunch, the \$3.59 rate can also be used for dinners. Per the reviewer's calculations, the SFA's nonfederal fund transfer for SY 16-17 exceeded the amount needed to cover the non-reimbursable meals for the year, but the SFA needs to make sure they document this compliance. Additional technical assistance was given to the SFA in an email. Reimbursement rates and adult meal pricing guidelines can be found on the DPI financial website: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>

Civil Rights - 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>. Recommend adding the abbreviated statement to the menus.

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.

On-Site Monitoring - 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>.

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.

Food Safety - During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated upon delivery.

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Administrative Review Conducted: Thursday, November 16, 2017
 Site(s) Selected for Review: 0
0
0

Date Corrective Action Plan was provided to SFA: 12/15/2017

Due Date for Corrective Action Plan: 1/15/2018

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: SFSP Outreach			
The SFA has not performed SFSP outreach.			
Technical Assistance			
It was determined during the review that the SFA has not performed SFSP outreach. The SFA must perform SFSP outreach before the end of the school year. Methods of outreach such as posting SFSP information on the SFA's website, parent newsletters and district-wide emails were discussed with the SFA. Schools may fulfill this requirement through Robo calls, flyers or other methods that notify the community of locations of summer meal sites. Methods to locate sites that serve free meals to children during the summer include the following:			
<ul style="list-style-type: none"> •Call 211 •Call 1.866.3Hungry or 1.877.8Hambre •Visit the website: www.fns.usda.gov/summerfoodrocks (note, this replaces the whyhunger.org website) •Use the site locator for smartphones - Rangeapp.org 			
For detailed regulation see: 210.12(d) Outreach activities. (2)			
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 will cooperate with Summer Food Service Program sponsors to conduct outreach on the			

Finding #2: Offer vs Serve			
The staff has not been trained on Offer versus Serve.			
Technical Assistance			

During the review, the training requirement for Offer versus Serve was discussed. If the SFA is going to implement Offer vs. Serve, they should annually train their staff and train new staff as needed. On going training should be provided depending on needs to staff in order to be in compliance with Offer vs. Serve procedures.

For detailed regulation see: Offer vs. Serve Guidance Manual (Page 4)

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 staff will be trained annually on Offer versus Serve.			

Finding #3: Offer vs Serve

Offer versus Serve reimbursable meal signage is not posted, including the requirement for students to select at least 1/2 cup fruit or vegetable.

Technical Assistance

During the review, the requirement for Offer versus Serve meal signage was reviewed with the SFA. Requirements include identifying, near or at the beginning of the serving line(s), the food items that constitute a reimbursable meal, including the requirement that students must take at least 1/2 cup of the fruit or vegetable component.

For detailed regulation see: 210.10 (a)(2) Unit pricing.

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 Offer versus Serve reimbursable meal signage is now posted. In the statement provide the location where signage was posted.			

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:

Jamie Hawkins

Date:

November 16, 2017

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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