NUTRITION PROGRAMS SIMPLIFIED

Administrative Review Summary and Corrective Actions

SFA Name:	Bloomer School District
SFA Code/ ID Number:	90497
Administrative Review Conducted on:	Friday, November 17, 2017

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on November 17, 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:	Bloomer School District
SFA Code/ID Number:	90497
Administrative Review Conducted on:	Friday, November 17, 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.
Thank you for adhering to the pricing requirements for both paid student lunches and adult meals.
It was a pleasure to review the Bloomer School District. Your paperwork was organized and easy to review.
The new elementary school is very bright and inviting. The meals provided were fresh and looked appetizing. It was great to see the students select fruits and veggies.
The kitchen staff were friendly and patient, helping each student select their meal and type in their number at the register.

Other areas of Technical Assistance (Does NOT require SFA Response)
Resource Management - Paid Lunch Equity Tool The SFA input the incorrect price into "Step 1" of the SY 17-18 Paid Lunch Equity Tool. The unrounded requirement price from the previous year should have been input into this step, but the SFA erroneously input the actual weighted average price rather than the requirement price. This error did not affect the SFA's compliance, and they resubmitted the corrected tool to DPI during the review. If the SFA is ever unsure if the unrounded requirement price on the previous year's tool is correct, they can use the weighted average from SY 10-11 to calculate the correct price to input into Step 1. This determination is made on the lower half of the Unrounded Requirement Finder tab, and "Price 2" would be rolled up into Step 1.
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 and it 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.
The SFA was reminded that the wellness policy should be reviewed at least every 3 years.
During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated upon delivery.
During the review, the importance of signage was discussed with the SFA. The SFA must ensure that signage is posted near or at the beginning of the serving line identifying what constitutes a reimbursable meal. This was corrected during the review and no further action is required.
Recommend reducing the frequency that grain based dessert items such as doughnuts, pastries, cakes and cookies are offered at breakfast.

Required Corrective Actions- Review Areas

SFA Name: Bloomer School District

SFA Code/ID: 90497

Administrative Review Conducted: Friday, November 17, 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: Resource Management			
The SFA charged unallowable costs to the food service account.			
Technical Assistance			
Expenses charged to the food service account must be necessary, reasonable and allocable. During the review, it was determined that the SFA charged unallowable costs to the food service program (see list below). The SFA is responsible for ensuring no unallowable purchases are made using food service funds, and should have internal controls in place to prevent such unallowable costs from occurring. Examples of internal controls include staff training on allowable costs, developing written policies & procedures so only trained, authorized personnel can approve food service expenses, and segregation of duties. An extensive list of allowable and unallowable costs can be found in 2 CFR Part 200, Subpart E. DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50. For both public and private schools in Wisconsin, any overhead costs assessed to foodservice must be based on documented and justifiable costs for each school building as they pertain to your school situation rather than on the indirect cost rate. (1) The SFA charged $20,897.11 of a secretary's salary and benefits to Fund 50, but did not have the documentation to substantiate this allocation. Although the cost is reasonable and necessary, the cost must also be allocable. Costs must be assigned to cost objectives based on the benefit received (DPI does not allow indirect costing). The SFA did not have documentation substantiating the benefit the food service program received from the secretary's services. This could be done through a time study or time sheets for the services provided to the food service program versus the rest of the school. The SFA will need to provide this documentation as part of their corrective action response, or the cost will be considered unallowable due to it not being allocable and Fund 50 will need to be reimbursed. (2) The SFA charged $16,058.98 of a custodian's salary and benefits to Fund 50, but did not have the documentation to substantiate this allocation. Although the cost is reasonable and necessary, the cost must also be allocable. Labor charges should be assessed based on actual time spent working for the food service program. The SFA must provide a time study to substantiate the allocation. If a time study is not provided, the entire cost is unallowable due to the inability to properly allocate the cost among the different cost objectives. If the time study shows the food service account was overcharged, or a time study cannot be provided, the SFA must pay back Fund 50 for the expense.			
For detailed regulation see: 2 CFR 200 Subpart E			
Required SFA Response	SFA Response	*CNR Internal Use*	
		Appv.	*Intls.*

1. Provide documentation showing the food service account was reimbursed for any unallowable costs charged in the previous school year. If the SFA has new documentation to support all or a portion of the expenses as allowable to the food service account, the SFA may provide this documentation. Examples include time studies, usage studies, or other calculations/documents showing that the expenses were reasonable, necessary, and allocable to the food service program.			
2. Provide the name(s) and title(s) of the SFA representative(s) that will ensure compliance.			
3. Explain how internal controls have been improved to prevent unallowable costs from being charged to the food service account in the future. This could include additional staff training, written policies & procedures on charging expenses to the food service account, a list of unallowable costs that will no longer be charged to food service, improved segregation of duties, etc.			

Finding #2: Certification and Benefit Issuance			
Not all selected applications were approved correctly. Not all applications included the amounts, source, and frequency of current income for each household			
Technical Assistance			
Complete applications must include the appropriate documentation. 245.2 Documentation means: (1) The completion of a free and reduced price school meal or free milk application which includes: (i) For households applying on the basis of income and household size, names of all household members; income received by each household member, identified by source of the income (such as earnings, wages, welfare, pensions, support payments, unemployment compensation, and social security and other cash income); the signature of an adult household member; and the last four digits of the social security number of the adult household member who signs the application or an indication that the adult does not possess a social security number.			
For detailed regulation see: Eligibility Manual, Chapter 3: Establishing Eligibility			
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 copies of each of the corrected applications, with the date corrected indicated, and letters to the household(s) if there is a change in eligibility status.			

Finding #3: Verification Confirmation Review			
The SFA was not completing a confirmation review prior to sending out notification for the selected applications.			
During the review, documenting the confirmation review was discussed with the SFA. The SFA must conduct confirmation reviews and maintain documentation that these took place.			
For detailed regulation see: 245.6a(e) Activities prior to household notification			
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 will complete a confirmation review on all applications that are selected for verification.			

Finding #4: Wellness Policy			
The SFA does not have a complete Local School Wellness Policy.			
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.			

Required Corrective Actions- Review Areas

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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
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