Administrative Review Summary and Corrective Actions

SFA Name: County of Champaign
Administrative Review Conducted on: 3/7/2017
SFA Contact Name and Title: Keith Willis, Asst. Superintendent
CNR Reviewer: Diane Ruff

The purpose of this spreadsheet is to inform you of the results of the Administrative Review that was conducted on March 7, 2017; an exit conference summarizing the findings took place on March 7, 2017.

The Administrative Review 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.

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 in the Corrective Action Plan must be submitted in writing to CN Resource, by Thursday, June 1, 2017. Please complete the chart, an electronic version or a hand written response will be acceptable. If any additional responses are needed, please respond on district letterhead. 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.

Any potential fiscal action will be calculated once the corrective action responses have been received and approved.

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. Please respond to the AR Corrective Action Document by Thursday, June 1, 2017.

Thank you,

Lindsay Hekal, Senior Vice President, RD, SNS

CN Resource
1930 N. Arboleda, 101, Mesa, Arizona 85213
p 866-941-6368 f 480-325-9967
# Administrative Review Summary and Corrective Actions

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## Commendations & Suggestions

- Review information was available for my arrival. All questions were answered and the staff was very professional.
- The food was fresh and the lunch arrived hot.

## Other areas of Technical Assistance (NOT requiring Corrective Action)

- **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.
- **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.
- **Health Inspections**: During the review, health inspections were discussed with the SFA. The SFA must request two health inspections for each site for each school year and must maintain documentation of this request.
The following pages address the findings that were identified during your Administrative Review. For each finding you will be presented with the following:

- The finding, and details specific to the SFA regarding the finding
- The Code of Federal Regulations citation number or alternate resource citation
- A summary of the regulation / requirement
- Suggested guidance for the SFA in order to achieve compliance
- SFA area for reply to state how, when and by whom corrections will be made

Please provide a detailed response to each finding in the space provided.

### Finding #1- Meal Components and Quantities: Review Week

For the week of menu review, the K-12 breakfast menu did not meet the minimum daily requirement of 1 ounce equivalent grain. A grain was provided, however the bread served several days this week was not Whole Grain Rich.

### Technical Assistance Provided

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. [http://healthymeals.nal.usda.gov/](http://healthymeals.nal.usda.gov/)

### Regulation / Citation and Summary

220.8(c) Meal pattern for school breakfasts. A school must offer the food components and quantities required in the breakfast meal pattern established. K-12: 1 oz. equivalent of grains daily.

### SFA Suggested Guidance for Compliance
To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all portion sizes planned meet at least the minimum required amount for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Serve a Whole Grain Rich bread product to meet all grain requirements. Submit an updated label for bread that is Whole Grain Rich.

SFA Response

Finding #2- Meal Components and Quantities: Review Week

For the week of menu review, the K-12 breakfast menu did not meet the minimum weekly requirement of 12.5 ounce equivalent grain for a 7 day week.

Technical Assistance Provided

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement meet the weekly requirements as well as the daily requirements for grains required for the specific grade group. The SFA should review all menus to ensure that at least the minimum daily and weekly requirement is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include how to determine the total number of weekly servings if there are multiple menu items each day. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/

Regulation / Citation and Summary

220.8(c) Meal pattern for school breakfasts. A school must offer the food components and quantities required in the breakfast meal pattern established. K-12: minimum 12.5 oz. equivalents of grain for a 7 day week.

SFA Suggested Guidance for Compliance
To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance. The plan should include: a statement that all menus will be reviewed to ensure that all weekly requirements for grains are met for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Submit documentation as described under finding #1 for daily grains, to demonstrate compliance to this finding as well.

SFA Response

Finding #3- Meal Components and Quantities: Review Week

For the menu review week, the K-12 breakfast menu did not meet the 100% Whole Grain Rich requirement. The bread served daily is not Whole Grain Rich.

Technical Assistance Provided

During the review requirements for the meal pattern were reviewed with the SFA. All grains provided as part of the reimbursable meal must be Whole Grain Rich. To be considered Whole Grain Rich the item it must be comprised of at least 50% whole grain ingredients. An easy way to determine if a pre-purchased item is whole grain is to look at the ingredient list. If the first ingredient is whole grain, it is a Whole Grain Rich product. If the first ingredient is water, but the second is a whole grain it is also a Whole Grain Rich product. If the SFA is using a recipe as long as the whole grain ingredient is the largest by weight of all of the grain ingredients combined it is a Whole Grain Rich product. For additional information on whole grains visit the USDA FNS website. http://healthymeals.nal.usda.gov/menu-planning/whole-grains

Regulation / Citation and Summary

220.8(c)(2)(iv) Grains component. (A) Enriched and whole grains. All grains must be made with enriched and whole grain meal or flour, in accordance with the most recent FNS guidance on grains. Whole grain-rich products must contain at least 50 percent whole grains and the remaining grains in the product must be enriched. Effective July 1, 2013 (SY 2013-2014), schools may substitute meats/meat alternates for grains, after the daily grains requirement is met, to meet the weekly grains requirement. One ounce equivalent of meat/meat alternate is equivalent to one ounce equivalent of grains.

SFA Suggested Guidance for Compliance
To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance with the Whole Grain Rich requirements. The plan should include; a statement that only Whole Grain Rich grain products will be used as part of the reimbursable meal, a statement that all labels/recipes/manufacturer statements will be kept on file to document the Whole Grain Rich compliance, and a statement that additional menu training will be provided to SFA staff. Provide the outline for the training and the dates that the training(s) will be completed. In the plan include the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. In addition to the plan please submit a revised menu from the week of review that clearly identifies the products that have been changed to bring the menu into compliance, submit any needed supporting documentation such as labels, recipes, and/or manufacturer statements. The bread served daily is not Whole Grain Rich.

**SFA Response**

**Finding #4- Meal Components and Quantities: Review Week**

For the week of menu review, the K-12 breakfast menu did not meet milk requirements for a variety of milk types served. Only one milk type was served for breakfast daily.

**Technical Assistance Provided**

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals served meet the correct portion sizes. For all grade groups 8 ounces of milk must be offered to every student. Low-fat unflavored and Fat-Free flavored or unflavored milk may be offered. A minimum of two different types of milk must be provided. If the sites opts to participate in Offer vs Serve they still must be able to provide a milk to every student that elects to take a milk as one of their components. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/

**Regulation / Citation and Summary**

220.8(c) Meal pattern for school breakfasts. A school must offer the food components and quantities required in the breakfast meal pattern established. All age/grade groups: 1 cup of milk daily and off an assortment of at least two milk types daily.

**SFA Suggested Guidance for Compliance**

To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance. The plan should include; a statement that low-fat and/or Fat-Free milk will be available to all students throughout the meal service, a statement that at a minimum there will be two different varieties of milk available, a process for sites to reference when they do not have two or more types of milk or if they run out of milk during meal service, and that additional menu training for all SFA staff will be provided. Submit documentation showing that two milk types will be offered daily. Documentation may include production records and labels.

**SFA Response**
During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: 9-12: 2 oz. equivalent daily grain.

To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all portion sizes planned meet at least the minimum required amount for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Serve a Whole Grain Rich bread product to meet all grain requirements. Submit an updated label for bread that is Whole Grain Rich.

Finding #6- Meal Components and Quantities: Review Week
For the week of menu review, the 9-12 lunch menu did not meet the minimum weekly requirement of 14 ounce equivalent grain for a 7 day week.
For the week of menu review, the 9-12 lunch menu did not meet the 100% Whole Grain Rich requirement for grains. The sliced bread served daily is not Whole Grain Rich.

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement meet the weekly requirements as well as the daily requirements for grains required for the specific grade group. The SFA should review all menus to ensure that at least the minimum daily and weekly requirement is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include how to determine the total number of weekly servings if there are multiple menu items each day. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern.

http://healthymeals.nal.usda.gov/

Regulation / Citation and Summary

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: 9-12: minimum of 14 oz. equivalent of grains for a 7 day week.

SFA Suggested Guidance for Compliance

To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all weekly requirements for grains are met for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Submit documentation as described under finding #5 for daily grains, to demonstrate compliance to this finding as well.

SFA Response

Finding #7- Meal Components and Quantities: Review Week

For the week of menu review, the 9-12 lunch menu did not meet the 100% Whole Grain Rich requirement for grains. The sliced bread served daily is not Whole Grain Rich.

Technical Assistance Provided

During the review requirements for the meal pattern were reviewed with the SFA. All grains provided as part of the reimbursable meal must be Whole Grain Rich. To be considered Whole Grain Rich the item it must be comprised of at least 50% whole grain ingredients. An easy way to determine if a pre-purchased item is whole grain is to look at the ingredient list. If the first ingredient is whole grain, it is a Whole Grain Rich product. If the first ingredient is water, but the second is a whole grain it is also a Whole Grain Rich product. If the SFA is using a recipe as long as the whole grain ingredient is the largest by weight of all of the grain ingredients combined it is a Whole Grain Rich product. For additional information on whole grains visit the USDA FNS website.

http://healthymeals.nal.usda.gov/menu-planning/whole-grains
Regulation / Citation and Summary
220.8(c)(2)(iv) Grains component. (A) Enriched and whole grains. All grains must be made with enriched and whole grain meal or flour, in accordance with the most recent FNS guidance on grains. Whole grain-rich products must contain at least 50 percent whole grains and the remaining grains in the product must be enriched.

SFA Suggested Guidance for Compliance
To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance with the Whole Grain Rich requirements. The plan should include: a statement that only Whole Grain Rich grain products will be used as part of the reimbursable meal, a statement that all labels/recipes/manufacturer statements will be kept on file to document the Whole Grain Rich compliance, and a statement that additional menu training will be provided to SFA staff. Provide the outline for the training and the dates that the training(s) will be completed. In the plan include the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. In addition to the plan please submit a revised menu from the week of review that clearly identifies the products that have been changed to bring the menu into compliance, submit any needed supporting documentation such as labels, recipes, and/or manufacturer statements. The sliced bread served this week is not Whole Grain Rich.

SFA Response

Finding #8- Meal Components and Quantities: Review Week
For the week of menu review, the 9-12 lunch menu did not meet milk requirements for a variety of milk types served. Only one milk type was served for lunch daily.

Technical Assistance Provided
During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals served meet the correct portion sizes. For all grade groups 8 ounces of milk must be offered to every student. Low-fat unflavored and Fat-Free flavored or unflavored milk may be offered. A minimum of two different types of milk must be provided. If the sites opts to participate in Offer vs Serve they still must be able to provide a milk to every student that elects to take a milk as one of their components. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern.
http://healthymeals.nal.usda.gov/

Regulation / Citation and Summary
220.8(c) Meal pattern for school lunch. A school must offer the food components and quantities required in the lunch meal pattern established. All age/grade groups: 1 cup of milk daily and off an assortment of at least two milk types daily.

SFA Suggested Guidance for Compliance
To come into compliance with meal pattern requirements, the SFA must provide a written plan that will be implemented to ensure future compliance. The plan should include; a statement that low-fat and/or Fat-Free milk will be available to all students throughout the meal service, a statement that at a minimum there will be two different varieties of milk available, a process for sites to reference when they do not have two or more types of milk or if they run out of milk during meal service, and that additional menu training for all SFA staff will be provided. Submit documentation showing that two milk types will be offered daily. Documentation may include production records and labels.

**Finding #9 - Civil Rights**

The SFA is attempting to resolve complaints alleging discrimination within the FNS School Meal Programs.

**Technical Assistance Provided**

During the review the process for receiving and processing complaints alleging discrimination was discussed with the SFA. The SFA should not attempt to resolve complaints in-house and should forward all complaints to the appropriate outside agency.

**Regulation / Citation and Summary**

FNS Instruction 113-1 Section XV 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. Anonymous complaints will be handled as any other complaints, to the extent feasible, based on available information.

**SFA Suggested Guidance for Compliance**

To come into compliance with civil rights requirements, the SFA must develop a procedure that will be put into place to handle any discrimination complaints and to forward them to an appropriate agency. The process must outline the steps that will be taken when a complaint is received, the name and contact information of the agency that the complaint will be forwarded to, and the name(s) and title(s) of the person(s) who will be responsible for forwarding complaints to the appropriate agency. Please submit the procedure.

**Finding #10 - Local School Wellness Policy**

The SFA has not reached out to potential stakeholders to participate in the development, review, update, and implementation of the Local School Wellness Policy.

**Technical Assistance Provided**
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. The SFA must reach out to these parties to make them aware of their ability to participate.

**Regulation / Citation and Summary**

| 210.30 Local School Wellness Policy (d) Public involvement and public notification. Each local educational agency must: (1) Permit parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public to participate in the development, implementation, and periodic review and update of the local school wellness policy; (2) Inform the public about the content and implementation of the local school wellness policy, and make the policy and any updates to the policy available to the public on an annual basis; (3) Inform the public about progress toward meeting the goals of the local school wellness policy and compliance with the local school wellness policy by making the triennial assessment, as required in paragraph (e)(2) of this section, available to the public in an accessible and easily understood manner.

**SFA Suggested Guidance for Compliance**

To come into compliance with this requirement the SFA must submit a statement that moving forward the SFA will advertise the ability to participate in the development and updating of the school wellness policy. The SFA should submit supporting documentation such as a flyer, or a website link that informs the public of the ability to participate.

**Finding #11 - Local School Wellness Policy**

An assessment of the Local School Wellness Policy has not been completed.

**Technical Assistance Provided**

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.

**Regulation / Citation and Summary**

| 210.30 Local School Wellness Policy (e) Implementation assessments and updates. Each local educational agency must:

1. Perform an assessment of the Local School Wellness Policy at a minimum once every three years.
2. Make the results of the assessment available to the public.
3. Use the results of the assessment to determine any changes or updates to the wellness policy.
To come into compliance with this requirement the SFA must submit a statement that and assessment of the wellness policy will be completed by the wellness committee. In addition to the statement the SFA must submit the minutes from the meeting that was held to complete the assessment. If the assessment has been updated by the corrective action due date, submit a copy of the assessment report. If the due date is prior to the completion of the assessment, submit a detailed timeline for the completion of the assessment. Once it is completed copy of the assessment should be submitted to the state agency for review.

**SFA Suggested Guidance for Compliance**

**Finding #12 - Food Safety**

The SFA did not have a copy of their written food safety plan available at the reviewed site(s).

**Technical Assistance Provided**

During the review, the food safety plan was discussed with the SFA. The SFA must have a food safety plan available at each site so that food service staff may stay in compliance with food safety requirements and procedures.

**Regulation / Citation and Summary**

210.13(c) Food safety program. The school food authority must develop a written food safety program that covers any facility or part of a facility where food is stored, prepared, or served. The food safety program must meet the requirements in paragraph (c)(1) or paragraph (c)(2) of this section, and the requirements in §210.15(b)(5). (1) A school food authority with a food safety program based on traditional hazard analysis and critical control point (HACCP) principles must: (i) Perform a hazard analysis; (ii) Decide on critical control points; (iii) Determine the critical limits; (iv) Establish procedures to monitor critical control points; (v) Establish corrective actions; (vi) Establish verification procedures; and (vii) Establish a recordkeeping system. (2) A school food authority with a food safety program based on the process approach to HACCP must ensure that its program includes: (i) Standard operating procedures to provide a food safety foundation; (ii) Menu items grouped according to process categories; (iii) Critical control points and critical limits; (iv) Monitoring procedures; (v) Corrective action procedures; (vi) Recordkeeping procedures; and (vii) Periodic program review and revision.

**SFA Suggested Guidance for Compliance**
To come into compliance with the requirements for food safety, the SFA must provide an assurance that the appropriate staff understand the requirements for a food safety plan. The assurance should include; a statement that the food safety plan will contain all required fields, that the food safety plan will be available at each site within the SFA, and that training will be completed for all appropriate SFA staff. In addition to the assurance an electronic copy of the food safety plan must be submitted for review.

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**Finding #13 - Summer Food Service Program Outreach**

The SFA has not performed SFSP outreach.

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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:

- 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

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210.12(d)(2) School food authorities must cooperate with Summer Food Service Program sponsors to distribute materials to inform families of the availability and location of free Summer Food Service Program meals for students when school is not in session.

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To come into compliance with this requirement, the SFA must submit an assurance that the SFA will cooperate with Summer Food Service Program sponsors to conduct outreach on the availability of the Summer Food Service Program. Additionally, please state the name and position of the person who will oversee compliance in this area.

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**Signature of Reviewer:** Diane Ruff  
**Date:** 3/7/2017
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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866-941-6368
adminreview@cnresource.com

Please insert your detailed responses, save, print, sign, scan and upload the signed copy to cnrsupport.com by the due date indicated. Thank you.