

# Administrative Review Report

Thorp School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	09/22/2019	11/11/2019
On-Site Review	11/11/2019	11/13/2019
Site Selection Worksheet	11/10/2019	11/10/2019
Entrance Conference	11/11/2019	11/11/2019
Exit Conference	11/13/2019	11/13/2019

## Commendations:

Thorp School District personnel were all very friendly and easy to gather information from to complete the Administrative Review (AR).

All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

We observed the meal service where all students access the programs, and found the students to be generally enthusiastic about the meal options and were well-informed of the meal components available.

The DPI review team appreciates the eagerness of the staff at Thorp SD for their willingness to make changes to meet school nutrition program regulations. The staff is concerned for the nutritional well-being of their students as evidenced through food safety, menu, and salad bar option for upper grades, local wellness policy and locally grown food. We are impressed that the school agriculture department uses aquaponics gardens, garden pots and is starting a tilapia farm for food items to use in the school nutrition programs.

The DPI review team is confident that Thorp School District will continue to improve their knowledge and operation of child nutrition programs through future trainings and actions.

## Recommendations:

A Technical Assistance and Compliance Reminder document is provides with many resource links to the DPI webpages on specific topics.

The due date for the Corrective Action responses is December 30, 2019.

## Findings and Corrective Action:

<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)	
<b>Question #</b>	705	
<b>TA Log #</b>	#1	
<b>Due Date</b>	12-30-19	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/21/2019 02:04 PM	Finding: SFA does not have adequate internal controls to maintain oversight of federal funds in the area of allowable expenses. The nonprofit school food service account was charged for monthly waste disposal fees at a percentage rate. A percent calculation is an unallowable expense and must be calculated to be a direct cost(2 CFR 200.303, 2 CFR

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		200.400). CA: The cost of the monthly disposal fees needs to have a study to calculate an actual cost for the school foodservice account. The results of that study will determine if unallowable expenses charged to the nonprofit school food service account during SY 2018-19 up to and through the dates of the Administrative Review must be refunded. Provide documents from the cost study compared to what was actually charged. Once the cost is determined, it will indicate if there is a need to transfer to food service using non-Federal sources and upload a copy of the general ledger into SNACS.
<b>Form Name</b>	Revenue From Non-Program Foods (709 - 711)	
<b>Question #</b>	709	
<b>TA Log #</b>	#2	
<b>Due Date</b>	12-30-19	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/21/2019 02:12 PM	Finding: SFA did not complete the DPI Nonprogram Foods Revenue Tool or USDA Tool to determine compliance with nonprogram foods pricing and ratio requirements per 7 CFR 210.14. CA 1: Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5 day reference period from the current school year. CA 2: Provide a statement of understanding that this tool is required to be completed annually and used to set nonprogram food pricing. Include the position responsible for ensuring this is completed.
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	801	
<b>TA Log #</b>	#3	
<b>Due Date</b>	12-30-19	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/25/2019 09:47 AM	Finding: The Public Release was not distributed to the required locations. CA: Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year.
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	803	
<b>TA Log #</b>	#4	
<b>Due Date</b>	12/30/2019	
<b>Corrective Action Status</b>	Flagged	

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<b>Corrective Action History</b>	Flagged	Findings: The SFA does not have procedures for handling discrimination complaints specific for the school meal program (FNS Instruction 113-1). The nondiscrimination policy provided, number 112, is for district use and does not address federal meal programs. CA: Provide a timeline for when a school meal program complaint policy will be put in place, or included in an existing district policy. Please see the technical assistance report for language ideas. Provide the name and title of the SFA representative that will ensure compliance.
	11/21/2019 10:44 AM	
<b>Form Name</b>	Local School Wellness (1007)	
<b>Question #</b>	1007	
<b>TA Log #</b>	#5	
<b>Due Date</b>	12-30-19	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged	Finding: Current Local Wellness Policy (LWP) does not include all of the required content, specifically a reference to the SFA adhering to meal regulations and food provided, but not sold to students (7 CFR 210.31). CA: Submit a timeline for bringing the LWP into compliance and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance.
	11/25/2019 07:45 AM	
<b>Form Name</b>	Professional Standards (1210 - 1219)	
<b>Question #</b>	1217	
<b>TA Log #</b>	#6	
<b>Due Date</b>	12-30-19	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged	Finding: Documentation of school food service staff training is not being maintained or tracked to demonstrate compliance with annual training requirements per 7 CFR 210.30. CA: Include all training hours completed this school year for each school food service employee onto the USDA or DPI professional standards training tracking tool and upload into SNACS.
	11/21/2019 02:46 PM	
<b>Site Name</b>	Thorp EI	
<b>Form Name</b>	Meal Counting and Claiming - Day of Review (317-321)	
<b>Question #</b>	317	
<b>TA Log #</b>	#7	
<b>Due Date</b>	12-30-19	
<b>Corrective Action Status</b>	Flagged	

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<b>Corrective Action History</b>	Flagged 11/25/2019 06:42 AM	The meal service line and point of service (POS) provides accurate counts of students and by category; however, the process lacks control. Students arrive to the line with a teacher, who scans in their ID cards before they receive a tray of food. A cashier checks the tray for meal components to indicate a reimbursable meal. The cashier is very busy assisting students and cleaning the area, so there is potential to miss looking at a tray on the 2 lines. CA: Submit a statement of the process to use for identifying reimbursable meals at the POS.
<b>Site Name</b>	Thorp El	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>	401	
<b>TA Log #</b>	#8	
<b>Due Date</b>	12-30-19	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/13/2019 09:43 AM	Finding: One lunch observed at Thorp Elementary was not reimbursable due to the student only selecting two components. At lunch, students must select three full components including ½ cup fruit and/or vegetable. Offer versus Serve resources on WI DPI's Menu Planning webpage may be used as training resources ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning</a> ). The lunch meal pattern webcast may also be helpful ( <a href="http://dpi.wi.gov/school-nutrition/training/webcasts#lunch">http://dpi.wi.gov/school-nutrition/training/webcasts#lunch</a> ). One non-reimbursable elementary lunch observed on November 12, 2019 will be reclaimed. Corrective Action: Submit a statement indicating understanding that students must select three full components, one of which is ½ cup fruit, vegetable, or combination, under Offer versus Serve. Explain how these errors will be corrected and avoided in the future.
<b>Site Name</b>	Thorp El	
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)	
<b>Question #</b>	402	
<b>TA Log #</b>	#9	
<b>Due Date</b>	12-30-19	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/13/2019 09:40 AM	Finding: All kindergarten lunches observed on the day of review were not reimbursable due to quantity shortages. Kindergarteners were served 0.5 ounce equivalents (oz eq) of grain and 1/8 cup of fruit, but must be offered 1 oz eq of grain and ½ cup of fruit daily. These shortages occurred because kindergarteners are being served the same portion sizes as 4K students. The 17 kindergarten lunches observed on November 12, 2019 will be reclaimed. Corrective Action: Please submit a statement confirming that kindergarten

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		students will be served meals that meet the K-5 meal pattern. Production records submitted as corrective action will also verify this.
<b>Site Name</b>	Thorp El	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412)	
<b>Question #</b>	409	
<b>TA Log #</b>	#10	
<b>Due Date</b>	12-30-19	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged</p> <p>11/13/2019 10:41 AM</p>	<p>Finding: The breakfast production record template being used is intended for the afterschool snack program and does not contain space for all required information. The lunch production record template being used contains outdated information and incorrect meal pattern grade groupings. Milk usage is not recorded by type. In some cases, the planned serving sizes are unclear for each grade group. Extensive technical assistance was given on switching to new production record templates and on how to accurately complete a production record. Corrective Action: Please submit one week of completed production records for breakfast and lunch.</p>
<b>Site Name</b>	Thorp El	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412)	
<b>Question #</b>	410	
<b>TA Log #</b>	#11	
<b>Due Date</b>	12-30-19	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged</p> <p>11/13/2019 11:24 AM</p>	<p>Finding: The week of review (October 14-18, 2019) contained four days with vegetable shortages for grades K-3. Grades K-3 were offered <math>\frac{1}{2}</math> cup vegetable on these four days, instead of the <math>\frac{3}{4}</math> cup that is required. Fiscal action is required when a weekly vegetable shortage is found on the current and the previous Administrative Review. Therefore, fiscal action will be assessed on October 18, 2019, the day during the week of review with the lowest participation for grades K-3 only. 102 K-3 lunches will be reclaimed. Corrective Action: Please submit one week of completed production records to show that all students in grades K-8 are being offered <math>\frac{3}{4}</math> cup of vegetable daily.</p>
<b>Site Name</b>	Thorp El	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412)	
<b>Question #</b>	411	
<b>TA Log #</b>	#12	
<b>Due Date</b>	12-30-19	
<b>Corrective Action Status</b>	Flagged	

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Corrective Action History	Flagged 11/13/2019 11:06 AM	Finding: During the week of review (October 14-18, 2019), students were not offered any starchy vegetables on the salad bar. Each reimbursable meal service line must independently meet the daily and weekly meal pattern requirements. At least ½ cup of starchy vegetable must be offered on the salad bar line over the course of the week. Peas, corn, and jicama are common starchy vegetable options. Fiscal action is required when a missing vegetable subgroup is found on the current and the previous Administrative Review. Therefore, fiscal action will be assessed on October 15, 2019 day, the day during the week of review with the lowest participation for grades 6-8 on the salad bar only. Nine 6-8 salad bar lunches will be reclaimed. Corrective Action: Please submit one week of completed salad bar production records to show that all vegetable subgroups were offered.
	Site Name	Thorp El
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	412	
TA Log #	#13	
Due Date	12-30-19	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/13/2019 11:38 AM	Finding: There was a weekly bean/pea/legume shortage at lunch for grades K-3 during the week of review (October 14-18, 2019). Only ¼ cup of beans/peas/legumes were offered over the course of the week, which does not meet the weekly ½ cup requirement for the K-8 meal pattern. Corrective Action: Submit a statement explaining how this weekly bean/pea/legume shortage will be fixed during the week of review.
	Site Name	Thorp El
Form Name	Food Safety, Storage and Buy American (1404-1411)	
Question #	1405	
TA Log #	#14	
Due Date	12-30-19	
Corrective Action Status	Flagged	
Corrective Action History	Flagged 11/19/2019 01:24 PM	Finding: Every school operating USDA School Child Nutrition Programs must have two food safety inspections during each school year (7 CFR 210.13). The SFA received two food safety inspections in the prior school year ,but does not have documentation for one of the inspections on file indicating that two inspections were requested from the local regulatory authority. CA: Contact the local regulatory authority to request a report from November 2018 or that they will be inspecting soon in this school year and providing the required two food

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		safety inspections. Submit and retain documentation of this communication.
<b>Site Name</b>	Thorp El	
<b>Form Name</b>	Food Safety, Storage and Buy American (1404-1411)	
<b>Question #</b>	1411	
<b>TA Log #</b>	#15	
<b>Due Date</b>	12-30-19	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/13/2019 09:15 AM	Finding: The following products were identified in the SFA's storage area as non-domestic and not documented: - Frozen broccoli (Mexico) - Fresh cucumbers (Canada) Corrective Action: Complete and submit Non-Compliant Product Forms for the products listed above ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx</a> ).
<b>Site Name</b>	Thorp El	
<b>Form Name</b>	Wisconsin School Day Milk Program	
<b>Question #</b>	3	
<b>TA Log #</b>	#16	
<b>Due Date</b>	12-30-19	
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/25/2019 09:52 AM	Finding: Milks are being claimed in the Wisconsin School Day Milk Program (WSDMP) for students in sixth grade, which do not qualify for this program. Tally marks for milk counts are not counted correctly and may result in fiscal reclaim. CA1: Fiscal action will be applied to all ineligible WSDMP milks claimed back to when the error began, up to the prior three school years. Review and correct the monthly milk count totals by removing all ineligible milks by month from school year 2016-17 and 2017-18. These milks are unallowable and the reimbursement received will need to be repaid to the state. CA2: Provide a statement of understanding that only milk counts for free and reduced-price eligible students in grades PreK-5th may be claimed. Paid student milks and adult milks are not eligible to be claimed.
<b>Site Name</b>	Thorp El	
<b>Form Name</b>	Wisconsin School Day Milk Program	
<b>Question #</b>	4	
<b>TA Log #</b>	#17	
<b>Due Date</b>	12-30-19	
<b>Corrective Action Status</b>	Flagged	

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<b>Corrective Action History</b>	Flagged	Finding: The tally marks yield an inaccurate total as compared to the total on each teacher's sheet. This results in a yearly inaccurate total of milks claimed or charged to households. Point of service counts (POS) for the Wisconsin School Day Program (WSDMP) must be recorded as the students receives a milk. A pre-marked sheet is unacceptable. Proper and consistent marking of the tally sheet is required.CA1: Submit a detailed statement, outlining how the school has changed the accountability system for claiming milk to include an approved POS. CA2: Provide two weeks of WSDMP counts with the corrected counting system. Upload in SNACS. CA3: Retrain staff on the new POS procedures. Upload documentation to support the training that was completed and staff sign in sheet into SNACS.
	11/25/2019 09:57 AM	

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
11/25/2019	1029	6	Administrative Review	Thorp EI	school nutrition team			
<b>Comments</b>								
						<b>Created By</b>		<b>Created Date</b>
Juice is an acceptable milk substitute only in the WSDMP and may be claimed for students of free or reduced priced meal eligibility status.								11/25/2019 9:59:33 AM
11/13/2019	932	410	Administrative Review	Thorp EI	FSD			
<b>Comments</b>								
						<b>Created By</b>		<b>Created Date</b>
Peanut butter is offered daily along with celery or bread. While it does credit towards the meat/meat alternate component for students selecting the salad bar option, it also adds extra calories on top of the planned reimbursable meal. Please consider offering peanut butter on only some days of the week to limit excess calories and encourage healthy portion control.								11/13/2019 6:37:11 PM
11/13/2019	931	409	Administrative Review	Thorp EI	FSD			
<b>Comments</b>								
						<b>Created By</b>		<b>Created Date</b>
Recipes should be updated to reflect current practices and products. Standardized recipes exist, but many are not accurately reflecting what is happening in the kitchen. For more information on what information must be on a standardized recipe, review the Standardized Recipe Checklist								11/13/2019 4:54:30 PM



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<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/standardized-recipe-checklist.pdf</a>										
11/13/2019	930	409	Administrative Review	Thorp EI	FSD					
Comments						Created By	Created Date			
The infant and pre-K meal patterns require cereal to contain no more than 6 grams of total sugars per dry ounce. This requirement will help reduce children's consumption of added sugars. For more information, including the sugar limit charts, the calculation formula, and cereals that meet the sugar requirements, please refer to the Infants and Preschool in NSLP and SBP webpage ( <a href="https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool">https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool</a> ).							11/13/2019 4:52:14 PM			
11/13/2019	929	409	Administrative Review	Thorp EI	FSD					
Comments						Created By	Created Date			
The salad bar production record template being used is adequate, but does contain some outdated language. Consider using an updated salad bar production record template found on the Production Records webpage ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning/production-records</a> ).							11/13/2019 4:43:09 PM			
11/13/2019	928	500	Administrative Review	Thorp EI	FSD					
Comments						Created By	Created Date			
It is critical that food service staff thoroughly understand Offer versus Serve (OVS) in order to ensure that all students select reimbursable meals. OVS resources on WI DPI's Menu Planning webpage may be used as training resources ( <a href="https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning#ovs">https://dpi.wi.gov/school-nutrition/program-requirements/menu-planning#ovs</a> ).							11/13/2019 4:37:58 PM			
11/13/2019	927	500	Administrative Review	Thorp EI	FSD					
Comments						Created By	Created Date			
Kindergarten students are currently being served without Offer Versus Serve (OVS). While OVS is not required for grades K-8, it is encouraged in order to reduce food waste and develop skills in making healthy meal choices. Without OVS, kindergarteners must be served $\frac{3}{4}$ cup vegetable and $\frac{1}{2}$ cup fruit to create a reimbursable meal, in addition to the other components. If OVS is implemented, then students can choose three of the five components offered, including $\frac{1}{2}$ cup of fruit and/or vegetable.							11/13/2019 4:36:41 PM			

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11/13/2019	923	409	Administrative Review	Thorp EI	FSD			
Comments						Created By	Created Date	
The vegetable subgroups are categorized based on nutrient composition. In order to ensure that students get a variety of nutrients each week, the lunch meal pattern requires the menu planner to offer students a certain amount of each vegetable subgroup over the course of the week. Refer to the Vegetable Subgroups handout ( <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/vegetable-subgroups.pdf</a> ) to identify vegetables in each subgroup.							11/13/2019 11:00:00 AM	
11/13/2019	1028	317	Administrative Review	Thorp EI	food service director			
Comments						Created By	Created Date	
The teachers are in the area after they scan the ID cards, so it would be better if the cards were scanned at the time the student actually exits the line and has access to all food components, including the milk.							11/25/2019 6:44:58 AM	
11/12/2019	1022	1400	Administrative Review	ALL	kitchen manager			
Comments						Created By	Created Date	
Employee Health Reporting Agreements were found, but not all staff had one on file. Update the files to include all staff working with food to have this agreement.							11/21/2019 2:57:22 PM	
11/12/2019	1021	1400	Administrative Review	ALL	kitchen manager			
Comments						Created By	Created Date	
The food safety plan included the required elements and compliance with Hazard Analysis Critical Control Points (HACCP). The food safety plan should cover any facility where food is stored, prepared, or served for purposes of NSLP, SBP, or other FNS programs (7 CFR 210.13). Please contact the local sanitarian to consider if a Standard Operating Procedure (SOP) is required for foods grown in a greenhouse, local harvesting and processing of protein foods and add one for field trips.							11/21/2019 2:55:05 PM	
11/12/2019	1020	710	Administrative Review	ALL	food service director			
Comments						Created By	Created Date	
Per 7CFR 210.10 (a) (2), SFAs must price each student meal as a unit. That meal unit is the same for the adult portion. If the adult							11/21/2019 2:27:58 PM	

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portion is increased, then the price charged must cover all expenses to produce that meal.							
11/12/2019	1019	709	Administrative Review	ALL	business manager		
<b>Comments</b>						<b>Created By</b>	<b>Created Date</b>
The non-program food revenue tool will indicate if items sold need to be increased based on a calculated proportion of food cost in the program meals as compared to overall food cost including non-program food sales. The purchased price of milk compared to the revenue for selling milk must be examined.							11/21/2019 2:26:00 PM
11/12/2019	1018	700	Administrative Review	ALL	business manager		
<b>Comments</b>						<b>Created By</b>	<b>Created Date</b>
On the Annual Food Service Financial Report (AFR), all of the revenues and expenses were not broken out for Non-program Foods category (7 CFR 210.19). That item must have more revenue than expenditures. The AFR was corrected and resubmitted while onsite.							11/21/2019 2:09:06 PM
11/12/2019	983	1404	Administrative Review	Thorp EI	kitchen supervisor		
<b>Comments</b>						<b>Created By</b>	<b>Created Date</b>
Although the Food Safety Plan was available for review, it is best practice to work with your local sanitarian (county health inspector) to include any Standard Operating Procedure (SOP) for Field Trip, microwave usage, food from the school greenhouse and meat/fish processing.							11/19/2019 1:31:32 PM
11/12/2019	982	1404	Administrative Review	Thorp EI	kitchen supervisor		
<b>Comments</b>						<b>Created By</b>	<b>Created Date</b>
Employee Health Reporting agreements were found, but not for all persons who work in the kitchen. Please include the student workers and all servers in the annual signing of the agreement; keep the agreements on file.							11/19/2019 1:28:33 PM
11/12/2019	1012	805	Administrative Review	ALL	administrative assistant		
<b>Comments</b>						<b>Created By</b>	<b>Created Date</b>
Please see language in the technical assistance document concerning medical statements and meal substitutions.							11/21/2019 10:47:59 AM

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11/12/2019	1011	101	Administrative Review	ALL	official			
Comments						Created By	Created Date	
If more than one person completes the duties of the determining official, they should both be included on the contract and checked that neither one also has the confirmation official title. The 2019-20 contract was modified with determining, verifying and confirming official names.							11/21/2019 10:24:34 AM	
11/12/2019	920	404	Administrative Review	Thorp EI	FSD			
Comments						Created By	Created Date	
Some of the information filled in on the salad bar signage is confusing or not applicable. Signage includes a space for indicating how much tofu students are expected to take, even though tofu is never offered. Signage also says that "1/2 piece of cubed cheese = 1 serving of protein," which is inaccurate because more than 1/2 of a cube would be needed to credit as 1 ounce equivalent of meat/meat alternate. Please edit your salad bar signage so that it appropriately reflects what you offer.							11/13/2019 9:59:18 AM	
11/11/2019	1010	101	Administrative Review	ALL	determining official			
Comments						Created By	Created Date	
If more than one person completes the duties of the determining official, they should both be included on the contract and checked that neither one also has the confirmation official title. The 2019-20 contract was modified with determining, verifying and confirming official names							11/21/2019 10:24:09 AM	