

# Administrative Review Report

Ashwaubenon School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/07/2019	11/10/2020
On-Site Review	N/A	N/A
Site Selection Worksheet	11/07/2019	03/01/2020
Entrance Conference	N/A	N/A
Exit Conference	11/16/2020	11/16/2020

## Commendations:

Due to the unprecedented COVID-19 related school closures beginning in March 2020, the State Agency (SA) was not able to perform the on-site portion of this Administrative Review (AR). The SA has, to the maximum extent feasible, continued to assist School Food Authorities (SFAs) with items that would normally be addressed in the on-site portion to ensure all SFAs are given the most thorough guidance and technical assistance possible. Any area or item identified as warranting Technical Assistance or Corrective Action will be addressed specifically in those respective sections of the report.

### From the Public Health Nutritionist:

Thank you to all staff at the Ashwaubenon School District for their cooperation and flexibility that made this off-site Administrative Review (AR) possible. Thank you to the food service director for uploading all required documentation into SNACS and for the quick response to questions--this greatly expedited the AR. Thank you for serving healthy, nutritious meals to the students of the Ashwaubenon community!

### From the Nutrition Program Consultant:

Of the 420 student eligibility statuses reviewed, there were not any benefit issuance errors identified. The determining official does an excellent job managing student benefits! Additionally, the determining official does a great job collaborating with the district's homeless liaison to ensure students experiencing homelessness receive free meal benefits in a timely fashion. Great job!

The food service director was very prepared for the review and began the questionnaire and document submission very early in the process. The director was also very responsive to questions and was quick to respond to any calls or emails. The director and other staff were also patient and understanding as the review was changed to an off-site model and took longer to complete than expected. Sincere thanks to the staff members for their attentiveness, flexibility, and positive attitude!

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## Findings and Corrective Action:

<b>Site Name</b>		
<b>Form Name</b>	Revenue From Non-Program Foods (709 - 711)	
<b>Question #</b>	709	
<b>TA Log #</b>	TA Log# exists	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 10/30/2020 12:16 PM</p>	<p><b>Finding:</b> The SFA did not accurately calculate the non-program food ratio. The SFA completed the Non-Program Foods Revenue Tool using a reference period in the 2019-20 school year, but did not include all required information into the tool (7 CFR 210.14). Correction of the tool is necessary in order to accurately assess if the non-program food revenue ratio was met.</p> <p><b>Corrective Action:</b> Please update the Non-Program Foods Revenue Tool to include the missing information from the reference period. Upload the corrected tool into the Documents section of SNACS. If the corrected tool shows non-compliance in Section W and indicates that additional revenue is needed to comply, please provide a statement detailing the SFA's plan to meet non-program food revenue requirements going forward.</p> <p><i>Corrected prior to exit conference. No further action needed.</i></p>
<b>Site Name</b>		
<b>Form Name</b>	Civil Rights (800 - 807)	
<b>Question #</b>	803	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 10/30/2020 12:24 PM</p>	<p><b>Finding:</b> The SFA does not have procedures for handling discrimination complaints specific for the school meal programs (FNS Instruction 113-1).</p> <p><b>Corrective Action:</b> Provide a timeline for when a school meal program complaint policy will be put in place, or included in an existing district policy. Provide the name and title of the SFA representative that will ensure compliance.</p> <p>Please reference the Complaints of Discrimination section of the <a href="#">Civil Rights webpage</a> for more information and a template policy (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights">https://dpi.wi.gov/school-nutrition/program-requirements/civil-rights</a>).</p>
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1000	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	<p>Flagged 10/30/2020 12:21 PM</p>	<p><b>Finding:</b> The current Local Wellness Policy (LWP) does not include all of the required content (7 CFR 210.31). Specific content language regarding public involvement, foods provided but not sold at school, and foods/beverage marketing is lacking. Further, the current policy language pertaining to nutrition promotion (specifically as it relates to Smarter Lunchroom techniques) and the triennial assessment could be improved.</p> <p><b>Corrective Action:</b> 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.</p> <p>Please review the <a href="#">LWP checklist</a> and <a href="#">LWP builder</a> for assistance in developing this necessary policy content (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf</a>);</p>

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	<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-online-builder-full-text.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-online-builder-full-text.pdf</a>	
<b>Site Name</b>		
<b>Form Name</b>	Local School Wellness (1000 - 1006)	
<b>Question #</b>	1005	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 10/30/2020 12:23 PM	<p><b>Finding:</b> The SFA did not complete the triennial assessment of the Local Wellness Policy (LWP) within the last three years leading up to the 6/30/20 deadline for the assessment. Additionally, the SFA did not complete the waiver in the spring to extend the deadline for the assessment to 6/30/21.</p> <p><b>Corrective Action:</b> Submit a detailed plan, including a timeline, for how the assessment of the LWP will be completed in the 20-21 school year. See corresponding technical assistance for more details on assessment requirements.</p>
<b>Site Name</b>	Parkview Mid	
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412)	
<b>Question #</b>	410	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 08/10/2020 03:12 PM	<p><b>Finding:</b> There was a weekly grain shortage at breakfast during the week of review. Only 7.5 oz eq. grain was offered over the course of the week, which does not meet the minimum 8.0 oz eq. grain requirement for the 6-8 meal pattern. The issue arises from the daily alternate breakfast entrée (cereal bowl). The cereal bowl only credits as 1 oz eq. grain and is not consistently offered with another grain or meat/meat alternate per the production records.</p> <p><b>Corrective Action:</b> Submit a statement explaining how this weekly grain shortage will be fixed during the week of review. Include any necessary serving sizes, nutrition facts labels, ingredients lists, and/or crediting documentation. Repeat violations during subsequent Administrative Reviews may result in fiscal action.</p>
<b>Site Name</b>		
<b>Form Name</b>	Maintenance of Non-Profit School Food Service Account (700 - 705)	
<b>Question #</b>	700	
<b>TA Log #</b>	No TA Log# found	
<b>Due Date</b>		
<b>Corrective Action Status</b>	Flagged	
<b>Corrective Action History</b>	Flagged 11/12/2020 11:29 AM	<p><b>Finding:</b> The 2018-19 Annual Financial Report (AFR) beginning fund balance did not match the ending fund balance on the 2017-18 report. Further, the beginning fund balance, total revenues, total expenditures, and ending fund balance on the 2018-19 AFR did not match the totals on the PI-1505 school finance report.</p> <p>The 2019-20 AFR was also reviewed. The beginning balance on the 2019-20 report did match the ending fund balance on the 2018-19 AFR. However, the beginning fund balance, total revenues, total expenditures, and ending fund balance on the 2019-20 report did not match totals on the PI-1505 school finance report. It is important that these reports match, specifically for the beginning and ending fund balance. Please see corresponding technical assistance for more details on the AFR.</p> <p><b>Corrective Action:</b> Update the 2019-20 Annual Financial Report and ensure the beginning fund balance, total revenues, total expenditures, and ending fund balance match the values on the PI-1505 report.</p>

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It is also recommended to review the program allocations and make corrections as necessary on the AFR. The report shows an excessive negative balance in the non-program foods category which is likely due to over-allocation of expenses since the non-program food revenue tool shows compliance and that non-program foods are priced appropriately. As a reminder, non-program foods cannot run in the negative and must generate enough revenue to be self-supporting.

Upload a copy of the updated 2019-20 AFR into SNACS. Once approved, the report will need to be updated in the online portal. The SFA can make AFR adjustments for 2019-20 in the online services system until December 31, 2020. The DPI accountant will need to manually make any adjustments after December 31, 2020. As part of the corrective action plan, please also provide a detailed statement describing how the AFR will be completed accurately in the future, including the name of the person that will be responsible for the report and any training they plan to complete related to the AFR.

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
11/03/2020	2290		Administrative Review					
<b>Comments</b>								
<b>Unpaid Meal Charge Policy</b>				<b>Created By</b>			<b>Created Date</b>	
<p>As a reminder, all SFAs are required to have a written and clearly communicated policy to address unpaid meal charges per <a href="https://fns-prod.azureedge.net/sites/default/files/cn/SP46-2016os.pdf">USDA memo SP 46-2016</a> (https://fns-prod.azureedge.net/sites/default/files/cn/SP46-2016os.pdf). The policy must be provided in writing to all households at the start of each school year and to households transferring to the school district during the school year.</p> <p>The policy must explain in detail how the SFA will handle situations where children without money in their account or on-hand to pay for their meal. By reading the provided unpaid meal charge policies, families should be able to understand the full progression of potential consequences if insufficient funds are available to pay for the children's meals.</p> <p>In the SFA, there was some inconsistent information in the board policy and the account balance information sent to all households as part of the school calendar. Inconsistencies between the board policy and the information sent to households may result in confusion by families experiencing consequences for unpaid meal charges and staff members responsible for implementing the policy/procedures. The SFA should ensure that the unpaid meal charge policy/procedures are consistently and clearly communicated to all households. Please review the Unpaid Meals section of the <a href="https://dpi.wi.gov/school-nutrition/program-requirements/financial-management">Financial Management webpage</a> for more resources and information (https://dpi.wi.gov/school-nutrition/program-requirements/financial-management).</p>							11/3/2020 3:25:41 PM	
10/30/2020	2289		Administrative Review					
<b>Comments</b>								
<b>Civil Rights Complaint Procedures</b>				<b>Created By</b>			<b>Created Date</b>	
<p>Any person or representative alleging discrimination based on a protected class has the right to file a complaint within 180 days of the alleged discriminatory action. Complaints may be written, verbal, or anonymous. All SFAs must have procedures for receiving and processing complaints alleging civil rights discrimination within the USDA Child Nutrition Programs.</p> <p>It is recommended SFAs use the <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx">Template Civil Rights Complaint Procedures</a> found on the Civil Rights webpage to create written procedures (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sfa-civil-rights-complaint-procedures-template.docx).</p> <p>An SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. If a complaint of discrimination is received at your district, the following procedures should be followed:</p> <ol style="list-style-type: none"> <li>1. Document the complaint using the <a href="http://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf">USDA Program Discrimination Complaint Form</a> (http://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).</li> <li>2. Submit complaints within five days of receiving the complaint to: Wisconsin Department of Public Instruction (DPI) Mail: Director, School Nutrition Team 125 S. Webster Street Madison, WI 53707-7841 Fax: (608) 267-0363 Email: jessica.sharkus@dpi.wi.gov.</li> <li>3. Maintain a Civil Rights complaint log at the SFA to record any discrimination complaints received. This log should be maintained in a confidential manner and only available to SFA staff members who have a legitimate need to know.</li> </ol>							10/30/2020 12:25:58 PM	
10/30/2020	2288		Administrative Review					

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Comments			
Annual Financial Report	Created By	Created Date	
<p>The 2018-19 annual financial report (AFR) contained several potential errors. The SFA should review the items below as well as the AFR resources and the Non-Program Foods resources on the <a href="https://dpi.wi.gov/school-nutrition/program-requirements/financial-management">Financial Management webpage</a> to ensure accurate AFR data going forward (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/financial-management">https://dpi.wi.gov/school-nutrition/program-requirements/financial-management</a>):</p> <ul style="list-style-type: none"> <li>The ending fund balance from the previous school year should exactly match the beginning fund balance for the current school year. For example, the ending fund balance as of June 30, 2019 (last day of the defined 18-19 school year) should exactly match the beginning fund balance as of July 1, 2019 (first day of the defined 19-20 school year).</li> <li>The beginning fund balance, total revenues, total expenditures, and ending fund balance on the AFR should exactly match the corresponding values for Fund 50 on the PI-1505 report. If these numbers are found not to match, investigation into and correction of the discrepancy is needed.</li> <li>The revenue reported for the Special Milk Program (SMP) should reflect the program reimbursements received during the school year and the payments received from the families of the participating 4K students for milk served as part of the SMP. These revenues should not include any payments received for milk purchased as an a la carte item during a meal period or for milk purchased by "paid" kindergarten students during milk break.</li> <li>The expenditures reported for the Wisconsin School Day Milk Program should only include the costs associated with providing free milk to free or reduced-price eligible children that participate in the program (which, in the SFA, only includes kindergarten students at participating schools). Revenues and expenditures associated with milk served at the kindergarten milk break for "paid" students is counted in the non-program foods category since these milks are not served and reimbursed as part of a Child Nutrition Program.</li> <li>Revenues should be reported on an accrual basis and expenses should be recorded as they are incurred (not as they are paid).</li> <li>Non-program foods must be self-supporting and cannot run in the negative. Revenue available to support the production of reimbursable meals cannot subsidize the sale of non-program foods. If non-program food revenue runs in the negative, non-federal funds must be transferred into the food service account to cover the deficit. The allocations on the 18-19 AFR showed a large loss in non-program foods, which is likely due to some allocation errors. The SFA should ensure allocations on the AFR are accurate to ensure proper assessment of non-program food revenue.</li> <li>Food expenditure allocations should be based on actual food expenses for each program.</li> <li>Labor expenditure allocations should be based on actual labor time used for each program. This should be based on an <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/time-study-tool.xlsx">annual time study</a> (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/time-study-tool.xlsx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/time-study-tool.xlsx</a>). Labor allocations should not be based on percentage of sales.</li> <li>Any other allowable expenses such as equipment, purchased services, and "other" that are shared among programs should be prorated accordingly. There is a <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/expense-allocation.xlsx">tool that can assist with this allocations</a> (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/expense-allocation.xlsx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/expense-allocation.xlsx</a>). These allocations should not be based on percentage of sales.</li> </ul>		10/30/2020 12:05:22 PM	
10/30/2020	2287	Administrative Review	
Comments			
Local Wellness Policy – Triennial Assessment	Created By	Created Date	
<p>SFAs must complete an assessment of their local wellness policy (LWP) at least once every three years. Additionally, SFAs must review and update the content of the policy periodically (annually is recommended). This suggested annual review and policy update is separate from the triennial assessment. The SFA did not complete the assessment by the 6/30/20 due date and did not complete waiver to extend the due date of the triennial assessment to 6/30/2021.</p> <p>The assessment must measure the SFA's compliance with their LWP, a description of the SFA's progress toward meeting LWP goals, and how the LWP compares to a model policy. A report must be developed and released to the public. SFAs must use the <a href="#">Wisconsin Local Wellness Policy Triennial Assessment Report Card</a> in order to fulfill the triennial assessment requirement which can be found on the Local Wellness Policy webpage (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/local-wellness-policy-report-card-with-instructions.docx">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/local-wellness-policy-report-card-with-instructions.docx</a>). The first page includes instructions for completing the Local Wellness Policy Triennial Assessment Report Card which can be found on page two. Please note that the online version of the Wisconsin Local Wellness Policy Report Card has been discontinued.</p> <p>The Triennial Assessment Report Card does not need to be submitted to the DPI School Nutrition Team. The Triennial Assessment Report Card should be kept on file for your next</p>		10/30/2020 10:35:06 AM	

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DPI Administrative Review. In addition, the results of the triennial assessment should be made available to the public.								
10/30/2020	2286		Administrative Review					
Comments								
Local Wellness Policy – Stakeholder Involvement				Created By	Created Date			
<p>The SFA has a variety of stakeholders involved with district wellness. However, it is unclear if the stakeholders are able provide input on the written content of the policy since the policy is primarily written by an outside agency.</p> <p>As a reminder, the SFA must permit parents, students, physical education teachers, school health professionals, school administrators, school board members, and the general public to be involved in the development, implementation, periodic review, and update of the LWP. The SFA must retain documentation on stakeholders who participated in the review and update of the LWP (7 CFR 210.31).</p> <p>SFAs are required to actively seek members for the wellness committee that represent a diverse group and to the extent possible, allow them to participate. SFAs must document stakeholders invited to participate in the committee and their relationship to the SFA. SFAs are encouraged to notify key stakeholders through various methods of communication (7 CFR 210.31).</p>					10/30/2020 10:16:21 AM			
10/30/2020	2285		Administrative Review					
Comments								
Local Wellness Policy -- Updates				Created By	Created Date			
<p>It is highly recommended to closely review the language in the Local Wellness Policy (LWP) to ensure it is up-to-date and is specific enough. The policy should include clear, measurable goals that apply specifically to the district. Please also remember that the policy must be reviewed and updated "periodically," which is recommended to occur annually. The posted board policy has a "last revised" date from 2015, which suggests the need for a revision.</p> <p>As the district works on updating and improving the wellness policy, it is recommended to review the resources on the <a href="https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy">Local Wellness Policy webpage</a> (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy">https://dpi.wi.gov/school-nutrition/program-requirements/local-wellness-policy</a>). Of particular interest may be:</p> <ul style="list-style-type: none"> <li>The Local Wellness Policy Builder which contains sample language that can be used when updating a policy</li> <li>The Local Wellness Policy Checklist which provides a summary of required content areas that must be included in the policy</li> </ul>					10/30/2020 10:05:02 AM			
10/30/2020	2283	1208	Administrative Review	ALL				
Comments								
Professional Standards				Created By	Created Date			
<p>The SFA has created their own electronic tool for tracking professional standards hours. The tool is structured to contain all required information for a tracking tool. However, not all hire dates for staff are filled in. Additionally, some of the employees' full time vs part time designations do not align with the required number of annual training hours listed for them. For example, some full time staff members are listed as needing to complete only four hours of training per year.</p> <p>As a reminder:</p> <ul style="list-style-type: none"> <li>Full time staff work 20 or more hours in food service each week and are required to complete six hours of training annually.</li> <li>Part time staff members work less than 20 hours in food service each week and are required to complete four hours of training annually.</li> <li>Food service directors are required to complete 12 hours of training annually.</li> <li>Staff designated as managers must complete 10 hours of training annually. The designation of "manager" is at the SFAs discretion based on the staff member's duties. See question #29 of the <a href="https://fns-prod.azureedge.net/sites/default/files/resource-files/SP05-2020os.pdf">USDA Q&amp;A</a> for details (<a href="https://fns-prod.azureedge.net/sites/default/files/resource-files/SP05-2020os.pdf">https://fns-prod.azureedge.net/sites/default/files/resource-files/SP05-2020os.pdf</a>).</li> </ul> <p>The SFA should review the tracking tool and correct these items. Please refer to the <a href="https://dpi.wi.gov/school-nutrition/program-requirements/professional-standards">Professional Standards webpage</a> and the <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-training-in-a-nutshell.pdf">"Training Requirements in a Nutshell"</a> resource (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/professional-standards">https://dpi.wi.gov/school-nutrition/program-requirements/professional-standards</a>; <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-training-in-a-nutshell.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/professional-standards-training-in-a-nutshell.pdf</a>).</p>					10/30/2020 9:42:25 AM			
10/30/2020	2282	709	Administrative Review	ALL				

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Comments					Created By	Created Date
<b>Non-Program Food Revenue Tool</b>						
<p>The SFA completed the non-program food revenue tool near the beginning of the 2019-20 school year. However, the tool requires several corrections in order to achieve an accurate assessment of the non-program food revenue ratio. The items listed below require correction:</p> <ul style="list-style-type: none"> <li>• Adult lunches and adult breakfasts must be included in the non-program food section of the tool. The raw food cost of the adult meals should be equal to the raw food cost of the equivalent student meal because adults and students should be offered the same meal.</li> <li>• Extra entrees must be included in the non-program food section of the tool.</li> <li>• Federal lunch reimbursements listed in the program food section excluded the \$0.07 per lunch performance-based reimbursement. The \$0.07 should be included in the reimbursement amount.</li> <li>• Milk served in the Special Milk Program must be included in the program food section of the tool because these milks are reimbursed as part of a federal Child Nutrition Program. Further, as a reminder, the "milk" part of the non-program food section should include milk sold to students to go with a cold lunch or as an extra milk with a hot lunch, as well as milk sold to kindergarteners of "Paid" status during milk break. Milk served to 4K students are part of the Special Milk Program and milk given free to kindergarteners of "Free" or "Reduced-Price" status during the Wisconsin School Day Milk Program milk break should not be included in this section.</li> </ul>						10/30/2020 9:25:59 AM
10/30/2020	2281	811	Administrative Review	Parkview Mid		
Comments					Created By	Created Date
<b>And Justice for All Poster</b>						
<p>The photo of the And Justice for All poster submitted as part of the off-site review was not the most updated version. The food service director stated that updated posters were requested in the 19-20 school year, but were not received. Poster requests submitted prior to COVID-19 were fulfilled. Mailing of posters for requests submitted during COVID-19 have been paused due to alternate working arrangements. In the meantime, SFAs are encouraged to <a href="#">print their own posters</a> until the official posters can be mailed (<a href="https://www.usda.gov/sites/default/files/documents/JFAGreen508.pdf">https://www.usda.gov/sites/default/files/documents/JFAGreen508.pdf</a>).</p>						10/30/2020 8:34:59 AM
10/29/2020	2280		Administrative Review			
Comments					Created By	Created Date
<b>Milk Programs – Point of Service</b>						
<p>The review site does not operate the Special Milk Program (SMP) or the Wisconsin School Day Milk Program (WSDMP), however some aspects of the program were discussed as part of the review. Review of the roster check off sheets for the milk programs and discussions with district representatives indicate that the POS is not acceptable. On the milk program roster sheets, the teachers mark off which students did NOT take milk or are absent and the rest of the students are left unmarked. The blank boxes are then what is counted for claiming.</p> <p>Counts used for reimbursement claims (including for milk programs) must be based on an acceptable, accurate point of service (POS). The POS is defined as the point where it can be reliably determined that an eligible child received a reimbursable milk or meal. Using morning attendance, milk counts taken prior to service (including pre-checking students on the roster for the day, week, or month) and counting based on the number students that do not take milk are not acceptable. In these methods, there is room for error if students order but do not take their milk, leave school before service time, or other such discrepancies.</p> <p>Please reference the <a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf">WSDMP FAQ</a> (<a href="https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf">https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/WSDMP-FAQ.pdf</a>). The SFA should work on revising the milk program POS so that students are checked off when they receive their milk. There was a finding regarding this subject on the last administrative review, which should have been resolved at that time. However, it appears that the SMP and WSDMP POS process is an outstanding issue.</p>						10/29/2020 1:47:06 PM
10/29/2020	2279		Administrative Review			
Comments					Created By	Created Date
<b>Milk Programs – Special Milk Program Allowable Milk Types</b>						
<p>The review site does not operate the Special Milk Program (SMP), however some aspects of the program were discussed as part of the review. Beginning on October 1, 2017, the updated Infant and Preschool meal pattern, also known as the Child and Adult Care Food Program (CACFP) meal pattern, replaced other meal pattern options for SFAs serving infants and/or children aged 1-5 years old and not yet in kindergarten. The Infant and Preschool meal pattern requirements were updated to better align them with the Dietary</p>						10/29/2020 1:24:20 PM

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Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. These updates do not allow flavored milk to be served to children five years old or younger and not yet in kindergarten, which also applies to SMP.							
If the SFA is currently offering flavored milk in SMP, please work towards compliance in this area by ceasing service of flavored milk in SMP. Please reference the <a href="#">Feeding Infants and Preschool webpage</a> and well as the <a href="https://dpi.wi.gov/school-nutrition/program-requirements/infants-and-preschool">SMP webpage</a> (https://dpi.wi.gov/school-nutrition/program-requirements/infants-and-preschool; https://dpi.wi.gov/school-nutrition/programs/milk-programs/special-milk).							
10/29/2020	2278		Administrative Review				
Comments							
Milk Programs – Special Milk Program Pricing Plans				Created By	Created Date		
<p>The review site does not operate the Special Milk Program (SMP), however some aspects of the program were discussed as part of the review. SMP is offered to the half-day 4K students that attend Cormier School and Early Learning Center. The SFA's online contract indicates that SMP is operated using the Pricing Plan in which all students pay the established fee which is listed as \$0.05. However, discussions with the SFA suggested that this pricing plan may not be being followed and the fee being charged for SMP may actually be higher than the \$0.05 per milk listed on the contract.</p> <p>There are three pricing options:</p> <ul style="list-style-type: none"> <li>• Pricing Plan (all students pay and all milk is claimed in paid category)</li> <li>• Pricing Plan with Free Milk Option (milk is provided free to children eligible for free milk and claimed in the free category; children not eligible for free milk pay the established fee for SMP milk and are claimed in the paid category)</li> <li>• Non-Pricing (all children are provided free milk and are all claimed in the paid category).</li> </ul> <p>If operating one of the pricing options, the price for the SMP milk should be as low as possible for the households. The SMP reimbursement should be maximized to keep the cost low for students. As noted on the SMP webpage, it is recommended to charge the difference between the anticipated per half-pint milk cost and the reimbursement rate. SFAs may consider adding about \$0.02 to this calculated price to cover any milk price adjustments and administrative costs associated with SMP. Appropriate SMP prices tend to be around \$0.05-\$0.10 per half-pint after completing this calculation. If the SFA is charging \$0.25--\$0.35 per half-pint in SMP, this price is likely too high and is not established to maximize reimbursement to keep cost low to families.</p> <p>The SFA should review the SMP requirements to assess which pricing option is desired and to assess if the price charged for SMP is compliant with program guidelines. The online contract should be updated if any changes are made to the SMP, as the contract should accurately reflect the SM P operations.</p>					10/29/2020 12:38:30 PM		
10/29/2020	2277		Administrative Review				
Comments							
Milk Programs – Special Milk Program Charges				Created By	Created Date		
<p>The review site does not operate the Special Milk Program (SMP), however some aspects of the program were discussed as part of the review. The SFA stated that they charge families for the SMP as one lump sum for the year instead of based on a per milk charge when milk is taken. This is allowable, but there are some things to consider with this pricing model. The annual milk cost should be priced out so if students took a milk each day, the daily cost would align with the SMP pricing guidance. If the student does not take a milk every day or has absences, it is not required to refund the student though it is a best practice to do so.</p>					10/29/2020 12:14:35 PM		
10/29/2020	2276	202	Administrative Review	ALL			
Comments							
Verification -- Tracker and Confirmation Review				Created By	Created Date		
<p>The dates listed for each step in the verification process on the verification tracker suggested that households may have been contacted prior to completion of the confirmation review. Discussions with the verification official indicated that dated letters are generated from the software system on the date applications are selected for the sample and this is the date recorded on the tracker as the "Date 'We Must Check Your Application' notice sent to household."</p> <p>As a reminder, the confirmation review must be completed before the household is contacted to request verification documentation. The dates recorded on the tracking sheet should accurately reflect the date the confirmation review is completed and the date the letter is sent to the household (not necessarily the date the letter was generated if it is not sent on the same day). Please refer to the Eligibility Manual for more details on the confirmation review.</p>					10/29/2020 11:38:21 AM		



# Administrative Review Report

Ashwaubenon School District

10/29/2020	2275	200	Administrative Review	ALL																																	
Comments																																					
Verification – Income Frequency					Created By	Created Date																															
When assessing income documents submitted by households for verification, it is important to verify the income frequency reported on paystubs and calculate income accordingly. For 19-20 verification, it appeared that the verifying official may have assessed one person's income as weekly income when the pay frequency on the paystub was unclear and may have represented biweekly pay. The two paystubs submitted listed the pay period end date and pay date. However, the pay period start date was not listed and income frequency was unclear. Please ensure that income frequency is assessed accurately during the verification process, contacting the household for clarification when needed.						10/29/2020 11:29:56 AM																															
10/29/2020	2274	200	Administrative Review	ALL																																	
Comments																																					
Verification – Sample Size					Created By	Created Date																															
The SFA used the standard sample for verification which involves application selection of error-prone applications. The SFA correctly used this sample size. SFAs are only required to use the standard sample when the non-response rate for verification in the previous year was 20% or greater, as notified via letter from DPI. SFAs that are not notified that they are required to use standard sampling can still choose to do so, but it is not required.						10/29/2020 11:25:30 AM																															
10/29/2020	2272	132	Administrative Review	ALL																																	
Comments																																					
Student Enrollment Data					Created By	Created Date																															
The enrollment numbers on the full direct certification (DC) runs do not align with the enrollment numbers reported on the NSLP claims. This suggests that incorrect enrollment data is being pulled for the DC runs or the claims. When comparing the enrollments on the 3/18/20 DC run and the March 2020 NSLP claim, the differences in the chart below noted.						10/29/2020 11:11:39 AM																															
<table border="1"> <thead> <tr> <th>Site</th> <th>3/18/20 DC Enrollment</th> <th>3/2020 NSLP Claim Enrollment</th> <th>Difference</th> </tr> </thead> <tbody> <tr> <td>20 Ashwaubenon High School</td> <td>1078</td> <td>962</td> <td>116</td> </tr> <tr> <td>55 Cormier Sch and Early Lrn Ctr</td> <td>368</td> <td>336</td> <td>32</td> </tr> <tr> <td>45 Parkview Mid</td> <td>770</td> <td>715</td> <td>55</td> </tr> <tr> <td>50 Pioneer El</td> <td>514</td> <td>490</td> <td>24</td> </tr> <tr> <td>60 Valley View Elementary</td> <td>746</td> <td>710</td> <td>36</td> </tr> <tr> <td><b>Total District</b></td> <td><b>3476</b></td> <td><b>3213</b></td> <td><b>263</b></td> </tr> </tbody> </table>					Site	3/18/20 DC Enrollment	3/2020 NSLP Claim Enrollment	Difference	20 Ashwaubenon High School	1078	962	116	55 Cormier Sch and Early Lrn Ctr	368	336	32	45 Parkview Mid	770	715	55	50 Pioneer El	514	490	24	60 Valley View Elementary	746	710	36	<b>Total District</b>	<b>3476</b>	<b>3213</b>	<b>263</b>					
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As a reminder, when running DC, select "Full Enrollment Run" ONLY when the DC student input file is a list of all the students in the SFA with access to at least one meal service (lunch and/or breakfast). The enrollment number reported on the claims for NSLP/SBP should be the number of enrolled students who had access to the meal at each site during the claiming month. For claiming, "enrolled" children are formally approved to attend the school. Please refer to the DC user guide and the NSLP claims manual.																																					
It is recommended to review the enrollment data used for DC and for NSLP/SBP claiming to ensure the numbers are accurate. If anyone is being run through DC who is not an enrolled student with meal access, they should not be included in the full enrollment run. DC full enrollment run data is often used for reporting and CEP assessment, so inaccurate enrollment counts could affect other reports.																																					
10/29/2020	2271	110	Administrative Review	ALL																																	

# Administrative Review Report

Ashwaubenon School District

Comments						
Direct Certification Notification Letter				Created By	Created Date	
The letter used by the SFA for direct certification notification to households meets the minimum requirements. However, it could be improved by clarifying that students matched with a Z code for reduced-price benefits could be eligible for free meals if a meal application is submitted and approved. The letter may also be improved by further explaining how/why the student was automatically approved for meal benefits and how other students in the household may be extended benefits. Referencing the DPI template letter could be helpful in making improvements to the SFA's direct certification letter.					10/29/2020 10:48:08 AM	
10/29/2020	2270	111	Administrative Review	ALL		
Comments						
Benefit Extension by Address Match				Created By	Created Date	
The software system links students in the same household using addresses. While this address match method may accurately extend benefits most of the time, it is possible that an address match could be incorrect if families move and do not update their address or are matched by apartment building. For this reason, it is recommended to double check address matches to ensure accurate benefit extension. There were no issues with this noted during the review, but there is potential for error when relying on address matching.					10/29/2020 10:39:46 AM	
08/10/2020	2204		Administrative Review		FSD	
Comments						
Production Records				Created By	Created Date	
All items offered as part of the reimbursable meal must be included on the production record as the production record serves to document what was served at each meal. When production records are not filled out completely, it is difficult to determine that all meal pattern requirements were met. For instance, the fresh or canned fruit that was offered with breakfast on 3/9 and 3/11 was not recorded on production records. Invoices were used to verify that the full fruit component was offered but this is not best practice. It is recommended that all Parkview Middle School staff view the Production Records training webcast ( <a href="https://dpi.wi.gov/school-nutrition/training/webcasts">https://dpi.wi.gov/school-nutrition/training/webcasts</a> ) for additional training on filling out production records in their entirety.					8/10/2020 3:23:20 PM	
08/10/2020	2203		Administrative Review		FSD	
Comments						
Alternate Entrée				Created By	Created Date	
An Uncrustable Combo (PB&J Combo) is available as an alternate entrée daily at lunch. As the Uncrustable only credits as 1 oz eq. grain and 1 oz eq. meat/meat alternate, an additional grain and meat/meat alternate is offered daily with the Uncrustable to ensure no weekly shortages. However, the additional grain and meat/meat alternate vary from day to day and are not included on production records. "PB&J Combo" is noted on the production records to specify this alternate entree. It is important to detail these additional grain and meat/meat alternate items. For example, a chocolate bear graham is one of the items that may be offered as the additional grain. As graham crackers are grain-based desserts, only 2 oz eq. per week are allowable. Without adequate documentation of the additional grain items included with the PB&J Combo, it is impossible to determine if the grain-based dessert amount was exceeded during the week of review based on production records. The additional grain and meat/meat alternate offered with the Uncrustable must be either included on the production record or a separate recipe can be created for each different combination possibility. The recipes could be numbered and staff could include PB&J Combo with the number of the recipe to specify which combo was offered that day.					8/10/2020 3:01:54 PM	