

# Administrative Review Report

Waupaca School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	11/20/2019	03/30/2020
On-Site Review	05/11/2020	05/13/2020
Site Selection Worksheet	11/20/2019	11/20/2019
Entrance Conference	05/11/2020	05/11/2020
Exit Conference	05/13/2020	05/13/2020

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). To the maximum extent feasible, the SA has 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. The SA appreciates the SFA's flexibility and willingness to complete the offsite review during this challenging time.

# Administrative Review Report

Waupaca School District

## Findings and Corrective Action:

Site Name		
Form Name	Certification and Benefit Issuance (100 - 121)	
Question #	106	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 06/01/2020 08:52 AM	<b>Finding:</b> IT staff person for Infinite Campus (IC) has access to student database for free and reduced information. <b>Corrective Action:</b> Have IT person with access to IC complete disclosure agreement and upload completed document to SNACS.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	803	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 06/01/2020 03:54 PM	<b>Finding:</b> The SFA does not have procedures in place for handling discrimination complaints specific to the USDA Child Nutrition Programs in which the school participates (FNS Instruction 113-1). <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.
Site Name		
Form Name	Civil Rights (800 - 807)	
Question #	805	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 07/22/2020 07:54 AM	<b>Finding:</b> All food substitutions made outside of the meal pattern are not supported by a signed medical statement from a licensed medical professional (7 CFR 210.10). <b>Corrective Action:</b> Provide a detailed statement indicating the steps the district will take to ensure that food substitutions made outside of the meal pattern are made based on an appropriate medical statement.
Site Name		
Form Name	Local School Wellness (1000 - 1006)	
Question #	1000	

# Administrative Review Report

Waupaca School District

TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	<p>Flagged 07/22/2020 10:48 AM</p>	<p><b>Finding:</b> Current Local Wellness Policy (LWP) does not include all of the required content (missing goals on nutrition education, nutrition promotion, physical activity, other school-based strategies for wellness) (7 CFR 210.31). Additionally, the Triennial Assessment (TE) or completion of the TE waiver extension was not completed by 6/30/2020. <b>Corrective Action:</b> Submit a timeline for bringing the LWP into compliance, including completion of the triennial assessment and include the name(s) and title(s) of the SFA representative(s) that will ensure compliance..</p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	126	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 07/23/2020 07:57 AM</p>	<p><b>Three hundred eighty (380) free and reduced student eligibilities were reviewed. Five (5) errors were identified. This is an error rate of 1.32% (under the 5% threshold for a required Independent Review of Applications and under the 3% threshold for fiscal action).</b> <b>Finding:</b> The SFA did not process all household applications in compliance with 7 CFR 245.6(a). The household meal benefits were incorreccted calculated and/or Direct Certification documents were not available. See the SFA-1 form provided by the consultant for specific details for which students need to be corrected. <b>Corrective Action:</b> Utilizing the SFA-1 form provided with the specific application and certification errors, correct the error(s) and indicate the date(s) the correction was made on the SFA-1. Upload a copy of the SFA-1, including all corrective action dates listed next to each error into SNACS.</p>
Site Name		
Form Name	Certification and Benefit Issuance (124 - 142)	
Question #	135	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	<p>Flagged 07/21/2020 04:38 PM</p>	<p><b>Finding:</b> The SFA did not retain direct certification (DC) match runs on file at the SFA, either electronically or hard copy (7 CFR 245.6).</p>

# Administrative Review Report

Waupaca School District

		<b>Corrective Action: Provide a statement</b> describing how the SFA will retain DC files for the required timeframe.
Site Name		
Form Name	Verification (207 - 215)	
Question #	209	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	CAP Submitted	
Corrective Action History	Flagged 07/21/2020 04:48 PM	<b>Finding:</b> Applications selected for verification were not verified correctly (7 CFR 245.6a). <b>Corrective Action: 1) send family adverse action letter and load to SNACS</b> 2) Have the verifying official <b>watch the "Verification Process"</b> webcast on the DPI website and <b>upload</b> a copy of the <b>completed quiz</b> into SNACS.
Site Name		
Form Name	Civil Rights (809 - 810)	
Question #	810	
TA Log #	No TA Log# found	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 07/02/2020 07:22 AM	<b>Finding:</b> The correct formatting of the non-discrimination statement is missing from the DC benefit notification letter. <b>Corrective Action:</b> Correct the format of the nondiscrimination statement to required program material and <b>upload updated material into SNACS.</b>
Site Name	Waupaca Hi	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	409	
TA Log #	TA Log# exists	
Due Date		
Corrective Action Status	Flagged	
Corrective Action History	Flagged 07/28/2020 11:57 AM	<b>Finding:</b> Incorrect crediting on some recipes. See technical assistance section below of the report for more information. <b>Corrective Action:</b> Update the following recipes and submit for review: <ul style="list-style-type: none"> <li>• Fried Rice</li> <li>• Breakfast Muffin</li> </ul>
Site Name	Waupaca Hi	
Form Name	Meal Components and Quantities - Review Period (409-412)	
Question #	410	
TA Log #	TA Log# exists	

# Administrative Review Report

Waupaca School District

<b>Due Date</b>	
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p>Flagged 07/28/2020 11:41 AM</p> <p><b>Finding:</b> High School Breakfast meal pattern does not meet the 50% whole grain-rich requirement. The only item offered at breakfast that was not whole grain-rich was the muffin. The large muffin credits as 4.25 oz eq grains. Reviewer strongly encourages the SFA to reduce the size of the muffin to 2 oz eq grains. In this way the menu will comply with the 50% whole grain-rich requirement as well as not provide an excess of grains throughout the week.</p> <p><b>Corrective Action:</b> Submit a statement that details your plan to bring the breakfast meal pattern into compliance. If the muffin recipe is updated, submit for review in the documents tab.</p>

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
07/28/2020	2190	409	Administrative Review	Waupaca Hi				

## Compliance Reminders

### STANDARDIZED RECIPES

There are some crediting errors in some of the standardized recipes. For example, The recipe for fried rice says it credits as 2 oz eq grains, but only 1 oz eq grains calculated per recipe amounts. There is 2 pounds (32 ounces) of brown rice in the recipe. The Food Buying Guide states that for 1 pound of rice (16 ounces) that equals 7.75 cups of cooked rice. Cross multiply to figure out how many cups of cooked rice are in 32 ounces (the amount in the recipe). The calculation reveals that there are 15.5 cups of cooked rice in the entire recipe. We divide that number by 26 (the recipe yield) and that equals 0.5961 cups of rice per serving. We must round down to 0.5 cup and that credits as 1 oz eq grain per serving.

The recipe for the muffin at breakfast states that it is a 2 oz eq grain but upon calculation of the amount of flour in the recipe each muffin credits as 4.25 oz eq grain. Using the worksheet for calculating grains contribution using grams of creditable grains (found in the Food Buying Guide) we do the following calculations: 5 pounds of flour in recipe X 453.6 grams = 2268 grams flour in recipe. Divide 2268 grams by 32 servings = 70.875. This is the amount of grams of creditable grains per portion. Now divide by 16 grams (reference amount of enriched or whole-grain meal and/or flour, in 1.0 oz eq grains) = 4.42 oz eq grains. Round down to the nearest 0.25 oz eq grains = 4.25 oz eq grains per muffin.

Be sure to carefully review all of your recipes and crediting calculations to ensure that they are correct. Be sure to update the new electronic menu system as well.

Visit our Standardized Recipes webpage for additional tools and resources or contact a Public Health Nutritionist for assistance (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/recipes>; <https://dpi.wi.gov/school-nutrition/directory>).

07/28/2020	2189	409	Administrative Review	Waupaca Hi				
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## Compliance Reminders

### WHOLE GRAIN-RICH REQUIREMENT

Half of the weekly grains offered and credited in school meal programs must be whole grain-rich. For the week of review only 44% of the grains offered were whole grain-rich. This is likely due to the very large muffin that is offered every day

# Administrative Review Report

Waupaca School District

of the week. Each muffin, according to the recipe, credits as 4.25 oz eq grain and the muffin mix is not whole grain-rich. Reviewer suggest reducing the size of the muffin to 2 oz eq grain to comply with the whole grain-rich requirement or switching to a whole grain-rich muffin mix.

07/28/2020	2188	409	Administrative Review	Waupaca Hi			
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## Compliance Reminders

### PRODUCTION RECORDS

Production records must list planned serving sizes for all items, including condiments. For example, production records show that many fruits are offered to students, but each fruit does not have a planned serving size associated with it. There is only one serving size listed above the list of fruits. However, to be clear for staff members and for future administrative reviews, a serving size must be next to each menu item. Update production records to reflect this.

07/28/2020	2187	410	Administrative Review	Waupaca Hi			
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## Compliance Reminders

### WEEK OF REVIEW

High School Breakfast: Does not meet whole grain rich requirements. 44% of all the grains offered are whole grain-rich. Meal Pattern requires that at least 50% of all the grains offered be whole grain-rich. The only item offered at breakfast that was not whole grain-rich was the muffin. The large muffin credits as 4.25 oz eq grains. Reviewer strongly encourages the SFA to reduce the size of the muffin to 2 oz eq grains. In this way the menu will comply with the 50% whole grain-rich requirement as well as not provide an excess of grains throughout the week.

High School Lunch: met meal pattern requirements

Elementary Lunch: met meal pattern requirements

07/23/2020	2183	1411	Administrative Review	Waupaca Hi			
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## Compliance Reminders

### BUY AMERICAN PROVISION

The Buy American provision requires school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodities or products. A "Domestic Commodity or Product" is an agricultural commodity or product that is produced or processed in the United States using substantial (more than 51 percent) agricultural commodities that are produced in the United States (including Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands).

The following information must be recorded on a Buy American Non-Compliant Product List:

- Date
- Name of product
- Country of origin
- Reason: Cost analysis, Seasonality, Availability, Substitution, Distribution, Other

A suggested Buy American - Non Compliant Product List template can be found on the Buy American webpage (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

For domestic products without country of origin labeling, consider the Buy American Provision Attestation for Agricultural Product(s) Purchased Between School and Contractor (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx>). By signing this Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision.

# Administrative Review Report

Waupaca School District

Refer to the Buy American in a Nutshell summary page for more information on how to fill out a non-compliant product sheet. Also visit the Buy American webpage for more information <https://dpi.wi.gov/school-nutrition/program-requirements/procurement/buy-american>

07/21/2020	2182	209	Administrative Review	ALL	FSD			
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## Compliance Reminders

### VERIFICATION

- When applications are chosen for verification, the person designated as the Confirming Official must review the application(s) to ensure the initial determination is correct prior to contacting the family. There is a place for the Confirming Official to sign and date on the back of the application. This must be noted on an electronic application if SFA is not using DPI Verification Tracker form. If form is completed, this suffices as CO signature.
- The LEA has a regulatory obligation to verify “for cause” all approved applications that may be questionable. For more information, refer to the current Eligibility Manual.
- When a benefit eligibility status increases, the change must take place within three days. When a benefit eligibility decreases, the change cannot take place before ten calendar days and a notice of adverse action is sent in writing with appeal rights procedures.
- When a household is selected for verification, it must provide “sources of information” to the LEA to confirm all current income or participation in a categorically eligible program. According to 7 CFR 245.6a(a)(7), sources of information may include written evidence, collateral contacts, and systems of records. Households which dispute the validity of information acquired through collateral contacts or a system of records must be given the opportunity to provide other documentation [7 CFR 245.6a(a)(7)(iv)].

07/21/2020	2181	133	Administrative Review	ALL	FSD			
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## Compliance Reminders

### DIRECT CERTIFICATION

- Always run Direct Certification matches in the required time frames (at or near the beginning of the school year, three months after the initial run and six months after the initial run near the end of March), when you receive a new student and other times to pick up any newly eligible students.
- The effective eligibility date for a DC eligible student is the date of the original output file. The output or downloaded (.txt) file from DC must be save for each run completed.
- A direct certification run should not be done specifically for students in parochial schools to identify free eligible for other funding sources (i.e., Title 1). DC runs are only for school nutrition and it is not allowable to be running it for other schools outside of your district or for purposes other than school nutrition programs.

07/21/2020	2180	126	Administrative Review	ALL	FSD			
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## Compliance Reminders

### APPLICATION DETERMINATION

- Any application that is missing required information, contains inconsistent information, or is unclear is considered an incomplete application and may not be determined until clarified with the household. The SFA may return the application to the household or contact the child’s parent or guardian either by phone or in writing/email. The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the parent to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.
- Household Size Box. The total household member size box (Step 3G) includes all children and adults in the household and must match the number of names on the application for that application to be considered complete.

# Administrative Review Report

Waupaca School District

- **Effective Date of Eligibility.** A child is eligible for free or reduced-price meal benefits on the date their eligibility is determined by the Determining Official. Aside from the approval date, Determining Officials must record the level of benefits for which the child(ren) is approved and sign or initial and date the application. (SFAs may establish the date of submission of an application as the effective date of eligibility, rather than the date the application is reviewed and eligibility is determined. This flexibility applies only to complete applications containing all required information. See SP 11-2014 for more information. **The SNT must be contacted for approval prior to implementing this flexibility.** Contact Karrie Isaacson at karrie.isaacson@dpi.wi.gov for more information and approval.)

06/01/2020	2073	800	Administrative Review	ALL	FSD			
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## Compliance Reminders

### NONDISCRIMINATION STATEMENT

- When including the non-discrimination statement on letters, menus, website, and other documents used to convey program information, it is necessary to use the current statement which was updated in 2015 (<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights>).
- However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used, "This institution is an equal opportunity provider." Either of these statements must be in the same size font as the other text in the document.

06/01/2020	2069	303	Administrative Review	ALL	FSD			
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## Compliance Reminders

### MEAL COUNTING AND CLAIMING

- Meals may only be charged to a student upon receipt of a reimbursable meal to assure proper benefits issuance.
- Meal benefits apply only to the reimbursable meal. The reimbursable meal includes milk as one of the required components, and must be priced as a unit. If the student decides to take only milk, this is not a reimbursable meal and the student will be charged for the milk as an a la carte item. It is a best practice to offer training annually for 'cashiers' (those operating the POS). This training should cover what constitutes a reimbursable meal, recognizing a reimbursable meal on the tray and OVS.

06/01/2020	2066	202	Administrative Review	ALL	FSD			
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## Compliance Reminders

### OFFICIALS IN THE CONTRACT

When naming officials in the online contract:

The Verifying Official may be the Determining Official.

The Confirming Official may not be the same as the Hearing Official or the Determining Official.

The Hearing Official may not be the same person as the Determining Official or the Verifying Official or the Confirming Official.

06/01/2020	2065	106	Administrative Review	ALL	FSD			
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## Compliance Reminders

### DISCLOSURE

- The information provided by the family on the free and reduced-price application is to be used only for determining eligibility for meal or milk benefits.



# Administrative Review Report

Waupaca School District

- Each school year, the LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the Sharing Information with Other Programs template on the Free and Reduced Meal Applications and Eligibility webpage (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc>).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the Disclosure Agreement form should be signed and on file at the district. A template Disclosure of Free and Reduced-Price Information form is located on the SNT website (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>).
- Note: aggregate data (just F/R numbers or percentages without a connection to individual names does not require prior parental sign-off before sharing and often times satisfies the request).