

# Administrative Review Report

Auburndale School District

## Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	10/30/2019	03/31/2020
On-Site Review	11/12/2019	11/14/2019
Site Selection Worksheet	10/30/2019	10/31/2019
Entrance Conference	11/12/2019	11/12/2019
Exit Conference	11/14/2019	11/14/2019

## Commendations:

Thank you to the Food Service Director, food service staff, and administration at Auburndale Middle/High School for your warm welcome, organized materials, and willingness to learn. Your responsiveness allowed the onsite portion of the Administrative Review to operate smoothly and gave DPI School Nutrition Team staff ample time to offer technical assistance.

SFAs in Wisconsin are offered an exemption related to fundraisers. Each student group may host two fundraisers per school year that are exempt, meaning the food items sold to students do not have to meet nutrition standards. It is required that one person at the SFA maintain a tracking sheet of all fundraisers during the school year. The HS principal maintains well-organized documentation regarding the occasional food-related fundraisers at Auburndale Middle/High School.

## Technical Assistance:

### Training

- Visit the DPI School Nutrition Team's training website for upcoming trainings, webinars and other resources, <https://dpi.wi.gov/school-nutrition/training>.

### Free and Reduced Price Meal Applications

- Applications must be reviewed in a timely manner. An eligibility determination must be made, the family notified of its status, and the status implemented within 10 operating days of the receipt of the application.
- 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.

### Carry Over

- An individual child's free and reduced price eligibility status from the previous year will continue, within the same LEA, for up to 30 **operating** (school) days into the new school year or until a new eligibility determination is made, whichever is first.
- During the carryover period, when a new determination is made (by application or DC), if the new meal benefit **increases** for a better meal benefit, the change must be made immediately and the household is notified.
- During the carryover period, when a new determination is made (by application or DC), if the change is a **decrease** in meal benefits, the LEA must notify the household in writing. LEAs may have 1-5 **calendar** days to notify the household and change the benefit. Adverse action is not applicable if a child's eligibility expires at the end of the carryover period.
- On DC runs during the carryover period, an "N" code is not a new determination.

### Household Size Box

- The total household member size box 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.

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## Incomplete Applications

- 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 (letter or e-mail). The determining official should document the details of the conversation plus date and initial. Applications missing signatures must be returned to the household adult to obtain. Reasonable effort should be made to obtain the missing information prior to denying the application.

## 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.
- 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 kept on file at the district. Find the [Disclosure of Free and Reduced-Price Information](#) template on the Free and Reduced Meal Applications and Eligibility webpage.

**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.

## Special Dietary Needs

- A signed medical statement from a licensed medical practitioner (in WI anyone who can write a prescription) must support all food substitutions made outside of the meal pattern requirements. Meals served to students with special dietary needs with the signed medical statement do not need to meet meal pattern requirements. This [flow chart](#) gives guidance on special dietary needs. The [USDA Q&A on Accommodating Special Dietary Needs resource](#) and the [USDA Special Dietary Needs Handbook](#) contains even more detailed information.
- It is recommended, but not required, for SFAs to use the prototype [Medical Statement](#) for Special Dietary Needs posted on the DPI SNT website, which is also available in Spanish and Hmong.

## Food Safety Plans

- All schools must have a comprehensive, site-specific food safety plan on-site, which includes HACCP process 1, 2, and 3 items; applicable SOPs; a list of equipment; and a list of food service staff at that site. The food safety plan must be reviewed annually. A prototype [food safety plan template](#) as well as template SOPs may be found on the [SNT Food Safety](#) webpage.

## Summer Food Service Program (SFSP) Outreach

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. The USDA requires all SFAs, regardless of whether the SFA serves summer meals, to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](#) on the DPI Summer Meals webpage
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text 'food' to 877-877 to locate meals in the area
- Promotion of the [Summer Food Service Program](#) webpage

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## Findings and Corrective Action:

Form Name	Certification and Benefit Issuance (100 - 121)
Question #	103
Corrective Action Status	Flagged
Corrective Action History	<p><b>Finding:</b> The SFA did not drop students off from the benefit issuance list when the 30 day carry over ended and continued to provide free or reduced price meals for students without any documentation.(7 CFR 245.6)</p> <p><b>Corrective Action #1:</b> Provide a notice of adverse action to the household(s) receiving incorrect benefits and upload a copy into SNACS. Fiscal Action will be assessed on the students who were on Nutrition Program Consultant's original Benefit Issuance list.</p> <p><b>Corrective Action #2:</b> In SNACS, under the "Documents" tab, there is a document called "Student eligibility not verified during AR". Open this file and verify that supporting eligibility documentation is on file for each student. Once the entire Benefit Issuance list is cleaned up, upload a copy into SNACS. Fiscal Action will not be assessed on these students since they were not on the original Benefit Issuance list.</p>
Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)
Question #	700
Corrective Action Status	Flagged
Corrective Action History	<p><b>Finding #1:</b> On the Annual Financial Report, the milk expenses were allocated to the Special Milk Program (SMP), which the SFA does not operate. The SFA operates the Wisconsin School Day Milk Program (WMMP), where the expenses should have been allocated.</p> <p><b>Finding #2:</b> Expenses were not allocated to Non-Program Foods. This section should include all the adult meals and a la carte.</p> <p><b>Corrective Action:</b> Upload the corrected report into SNACS. Once approved, the report will need to be updated in the online portal. The SFA can modify this report in the portal before December 31. The DPI accountant will have to make any adjustments after December 31.</p>
Form Name	Revenue From Non-Program Foods (709 - 711)
Question #	709
Corrective Action Status	Flagged
Corrective Action History	<p><b>Finding:</b> 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.</p> <p><b>Corrective Action #1:</b> Complete the DPI Nonprogram Foods Revenue Tool and upload into SNACS using a 5 day reference period from the current school year. This can be found at <a href="https://dpi.wi.gov/school-nutrition/program-requirements/financial-management">https://dpi.wi.gov/school-nutrition/program-requirements/financial-management</a>.</p>

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	<b>Corrective Action #2:</b> 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>	803
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p><b>Findings:</b> The SFA does not have procedures for handling discrimination complaints specific for the school meal program (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>
<b>Form Name</b>	School Breakfast and Summer Food Service Program Outreach (1600 - 1601)
<b>Question #</b>	1601
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p><b>Finding:</b> The SFA did not adequately inform households about the availability and location of free meals for students via the <a href="https://dpi.wi.gov/community-nutrition/sfsp">Summer Food Service Program (SFSP)</a>, <a href="https://dpi.wi.gov/community-nutrition/sfsp">https://dpi.wi.gov/community-nutrition/sfsp</a>.</p> <p><b>Corrective Action:</b> Provide a statement describing how households will be informed about the availability of SFSP for the upcoming summer and going forward. Please include the method of communication and time frame for distributing SFSP outreach materials.</p>
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)
<b>Question #</b>	126
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p><b>Finding:</b> The SFA did not process all household applications in compliance with 7 CFR 245.6(a). See the SFA-1 form provided by the consultant for specific details on which applications need to be corrected.</p> <p><b>Corrective Action #1:</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> <p><b>Corrective Action #2:</b> Notify the household of the correct meal benefit, per program requirements. Upload a copy of the letter to the household and documentation that the benefit issuance list has been updated into SNACS.</p>
<b>Form Name</b>	Certification and Benefit Issuance (124 - 142)
<b>Question #</b>	134
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p><b>Finding:</b> The SFA did not perform Direct Certification (DC) in the required timeframes (7 CFR 245.6) due to a change in staffing. Full Enrollment DC runs must be performed at least 3 times each school year: at or around the beginning of the school year, 3 months after the initial match and again 6 months after the initial match (7 CFR 245.6).</p>

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	<b>Corrective Action</b> Provide a statement of how and when the SFA will perform the full enrollment DC runs in the required time frames during the school year.
<b>Form Name</b>	Verification (207 - 215)
<b>Question #</b>	208
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p><b>Finding:</b> SFA did not complete a confirmation review before verifying application(s).</p> <p><b>Corrective Action:</b> Review the verification section of the Eligibility Manual and submit a statement of understanding that a confirmation review must be done by the confirming official for the selected application(s) before reaching out to households selected for verification.</p>
<b>Form Name</b>	Meal Counting and Claiming - Review Period (322-325)
<b>Question #</b>	325
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p><b>Finding:</b> SFA does not have internal controls to ensure the accuracy of meal counts prior to the submission of the monthly claim for reimbursement per 7 CFR 210.8. Meal counts by eligibility category were not correctly reported on the monthly claim. SFA should be using the "Edit Check" within their software.</p> <p><b>Corrective Action:</b> Upload monthly edit checks for breakfast and lunch for September thru October into SNACS. <b>Completed on site, no further action required.</b></p>
<b>Site Name</b>	Auburndale Middle/Senior High School
<b>Form Name</b>	Meal Components and Quantities - Day of Review (400-408)
<b>Question #</b>	404
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p><b>Finding:</b> Signage was not posted at breakfast or lunch to show students what makes up a reimbursable meal. Signage must be posted visible to students that indicates the offered components in each meal and tells students what they must select in order to make a reimbursable meal. The lunch signage should list the five components and inform students that under Offer versus Serve (OVS), they must select at least three full components, one of which must be at least ½ cup fruit and/or vegetable, or a combination. Signage examples can be found on our signage webpage.</p> <p><b>Corrective Action:</b> Submit two separate pictures of complete breakfast and lunch signage posted near the service line.</p>
<b>Site Name</b>	Auburndale Middle/Senior High School
<b>Form Name</b>	Meal Components and Quantities - Review Period (409-412)
<b>Question #</b>	411
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p><b>Finding:</b> The printed menu is missing the milk choice. Milk is listed daily, but does not include a statement that says a variety of milk is offered as part of the reimbursable meal.</p> <p><b>Corrective Action:</b> Please update the printed menu clarifying varieties of milk offered and upload the document to SNACS.</p>

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<b>Form Name</b>	SFA On-Site Monitoring (901 - 904)
<b>Question #</b>	901
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p><b>Finding:</b> SFA did not meet on-site monitoring requirements for NSLP or SBP per 7 CFR 210.8.</p> <p><b>CA #1:</b> Complete all required onsite monitoring for the current school year and upload into SNACS. If any corrective actions are found during the on-site monitoring, complete the corrective actions within 45 days of the initial on-site assessment and include this as part of CA.</p> <p><b>CA #2:</b> Submit a plan on how onsite monitoring will be completed for each school and program moving forward and the position responsible.</p>
<b>Site Name</b>	<b>Auburndale Middle/Senior High School</b>
<b>Form Name</b>	Smart Snacks (1104 - 1107)
<b>Question #</b>	1104
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p><b>Finding:</b> The a la carte entree "Hamburger on a Bun" sold during the week of review exceed the sodium limit for entrees of 480 mg.</p> <p><b>Corrective Action:</b> Please submit a plan for assessing all a la carte entrees sold to students for nutrition compliance. As discussed with FSD, incorporating the a la carte entrees into a reimbursable meal would make it exempt from all general and nutrient standards.</p>
<b>Site Name</b>	<b>Auburndale Middle/Senior High School</b>
<b>Form Name</b>	Smart Snacks (1104 - 1107)
<b>Question #</b>	1105
<b>Corrective Action Status</b>	Flagged
<b>Corrective Action History</b>	<p><b>Finding:</b> Only plain water, 100% juice, or milk are allowable Smart Snack beverages in middle schools. More information can be found on DPI's Smart Snacks webpage. (<a href="https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks">https://dpi.wi.gov/school-nutrition/program-requirements/smart-snacks</a>).</p> <p><b>Corrective Action:</b> State what will be done with all beverage offerings to comply with the Smart Snack regulations.</p>

## Technical Assistance Entries:

TA Date	TA Log #	Question #	TA Area	Site	SFA Contact	Email	Phone	User Name
11/13/2019	922		Administrative Review	Auburndale Middle/Senior High School				

### Comments

PHN and food service staff discussed weight and volume of vegetable offerings on the garden bar. After determining that ½ cup of carrots weighs 2.48 oz, staff weighed the baby carrots they use in their operation. Determined 10 baby carrots is required to fulfill ½ cup. Proper in-house yield analysis procedures were discussed. Staff agreed to continue to weigh garden bar offerings and update salad bar signage as needed. Salad Bar signage featured on Menu Planning page was promoted.

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