

Administrative Review Report

Phelps School District

Review Schedule:

Schedule Type	Start Date	End Date
Off-Site Review	01/31/2019	03/21/2019
On-Site Review	03/20/2019	03/22/2019
Site Selection Worksheet	01/31/2019	02/08/2019
Entrance Conference	03/20/2019	03/20/2019
Exit Conference	03/21/2019	03/21/2019

Commendations:

From the NPC:

Thank you to staff and school nutrition professionals at Phelps School District for the courtesies extended to the review team during the on site portion of the review. Thank you for the time and attention given to the off-site questionnaire and documents and for pull records for the review team while on site. It is apparent how much care the school nutrition professionals put into the meals for their students. The review team is confident that Phelps School District will continue to operate and improve its school meals programs.

The following items were completed according to program requirements: approved and denied Free and Reduced Applications, Verification process, Direct Certification (DC) runs, household notification letters, accurate consolidation of meal and snack counts for the review period, production of accurate counts from the Point of Service (POS) system, appropriate student and adult meal prices, allowable charges only to the non-profit food service account, completion of the Annual Financial Report (AFR), training tracking for Professional Standards, completion of annual Civil Rights training and PI-1441, proper handling of Special Dietary Needs, completion of On-site Monitoring for NSLP and SBP, site-specific Food Safety Plan containing all required components, two food safety inspections in the past and current school year, postage of most recent food safety inspection report, DC run maintained on file, completion and review of a district Local Wellness Policy (LWP), proper administration of the Afterschool Snack Program (ASP), and the meal pattern is followed for ASP.

From the PHN:

Sincere thanks to the Food Service Director and school nutrition professionals of Phelps School District. We appreciate your time and efforts spent preparing for and participating in the onsite review. The Food Service Director is friendly and energetic. She works hard planning, preparing, and serving reimbursable breakfast and lunches to students. She manages her time well. Students and school personnel think highly of the Food Service Director and of the school meals programs, especially the salads. The service line is efficient, and the meals are good quality. Students are offered a choice of entrees, and the school nutrition professionals forecast and prepare choices accurately, resulting in minimal food waste. Well done!

Recommendations:

The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at a nominal charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin [DPI School Nutrition Training webpage](http://dpi.wi.gov/school-nutrition/training) (dpi.wi.gov/school-nutrition/training).

SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin [DPI GOALS webpage](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

Wisconsin Team Nutrition is hosting a Teaming Up to Increase Participation workshop on June 19, 2019 at Chula Vista

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Resort (Wisconsin Dells). This one-day workshop will feature a keynote address that will encourage school nutrition staff to recognize that the true magic kingdom is the school cafeteria while teaching participants how to create magical experiences for their students. The workshop will also showcase speakers well-versed in three different areas: Smarter Lunchrooms; marketing and communications; and alternative service models. Through facilitated conversation and peer-to-peer discussion, attendees will identify strategies to implement and leave the workshop with a plan of action for moving forward. The cost to attend the workshop is \$30. More information about the workshop is available on the [School Nutrition Training webpage](http://dpi.wi.gov/school-nutrition/training/increase-participation-workshop) (dpi.wi.gov/school-nutrition/training/increase-participation-workshop).

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Findings and Corrective Actions

Form Name	Maintenance of Non-Profit School Food Service Account (700 - 705)
Question #	705
Corrective Action History	<p>Finding #1: SFA does not have adequate internal controls to maintain oversight of federal funds (2 CFR 200.303).</p> <p>Corrective Action Required: Develop written internal controls to maintain oversight of federal funds and include the one or more of the following: staff training, separation of duties, policy on how to handle bad (uncollectable) debt, and/or physical controls to ensure money is not lost or stolen. Upload into SNACS.</p>
Form Name	Civil Rights (800 - 807)
Question #	801
Corrective Action History	<p>Finding #2: The Public Release was not distributed to the required locations.</p> <p>Corrective Action Required: Upload into SNACS the names of 2-3 organizations that the public release will be sent in the following school year.</p>
Form Name	Local School Wellness (1000 - 1006)
Question #	1005
Corrective Action History	<p>Finding #3: The LWP is currently in four separate sections. Each of these four sections needs the Non-Discrimination Statement, and one of the policies must discuss the required Triennial Assessment.</p> <p>Corrective Action Required: Please update the current LWP to include the Non-Discrimination Statement and Triennial Assessment and upload it into SNACS.</p>
Form Name	Certification and Benefit Issuance (124 - 142)
Question #	137
Corrective Action History	<p>Finding #4: One application was missing the household member number. This application would be considered incomplete and could not be processed until the household number was received from the household.</p> <p>Corrective Action Required: Corrected on site. No further action required.</p>
Site Name	
Form Name	Food Safety & Buy American (1400 - 1403)
Question #	1400
Corrective Action History	<p>Finding #5: The ASP requires a Standard Operating Procedure (SOP) to be included within the Food Safety Plan. Revise the SOP to include information on how food safety will be enforced during the service of snacks at Phelps School District.</p>

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	Corrective Action Required: Please revise the ASP SOP template to make it specific to your operations and upload the draft into SNACS (https://dpi.wi.gov/school-nutrition/food-safety).
Form Name	Meal Counting and Claiming - Day of Review (317-321)
Question #	320
Corrective Action History	<p>Finding #6: The meal counting and claiming system does not result in accurate meal counts by eligibility (7 CFR 210.7). Day of review meal counts are not combined and recorded correctly.</p> <p>Corrective Action Required: Correct the meal counting process to ensure meal counts are correctly counted. Submit a statement describing the corrected system along with a timeline for implementation.</p>
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1407
Corrective Action History	<p>Finding #7: Phelps School District's food safety plan does not include a Standard Operating Procedure (SOP) for Field Trip meals.</p> <p>Corrective Action Required: Please upload a draft SOP into SNACS. This SOP will need approval from your local sanitarian and must be tailored to your site's specific operations. A template Field Trip Meal SOP may be found on DPI SNT's Food Safety webpage (https://dpi.wi.gov/school-nutrition/food-safety).</p>
Form Name	Afterschool Snack Program
Question #	6
Corrective Action History	<p>Finding #8: There was one item from the week of review for ASP where crediting documentation was not available.</p> <p>Corrective Action Required: Please follow up regarding the Kashi Bar crediting documentation and upload this into SNACS.</p>
Form Name	Afterschool Snack Program
Question #	7
Corrective Action History	<p>Finding #9: On-Site Monitoring was not completed for APS (https://dpi.wi.gov/school-nutrition/after-school). This must be completed within the first four weeks of ASP service.</p> <p>Corrective Action Required: Please upload into SNACS a completed ASP form by the Ca due date. Additionally, submit a statement with who will be completed the forms going forward and that they will be completed within the first four week of snack service in future school years.</p>
Form Name	Meal Components and Quantities - Review Period (409-412)

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Question #	409
Corrective Action History	<p>Finding #10: Current breakfast and lunch production record templates do not meet the production record requirements. Production records submitted for the review period were not filled in completely. The column for Actual Quantity Prepared was modified to record temperatures.</p> <p>Required Corrective Action: Update production records to include the following missing and/or incomplete information:</p> <ul style="list-style-type: none"> • Planned number of servings prepared • Planned/actual quantity prepared in purchase units • Number of reimbursable and non-reimbursable (adult) meals served • Substitutions made for students with special dietary needs (keep dietary request form on file as supporting documentation) <p>Please submit three full days of completed production records, updated to reflect these requirements. Select production records you are confident are filled in accurately and completely. Alternatively, please submit a statement of intent to use DPI SNT production record templates next school year (SY) 2019-20. Microsoft Excel and PDF files are posted to the Production Records webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records).</p>
Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	410
Corrective Action History	<p>Finding #11: The daily and weekly minimum requirements for fruit were not met during the review period as a result of 3/4 cups of grapes offered on Thursday. One-quarter cup of salsa was served with the spicy egg taco but was not served with Rice Krispies cereal and whole grain-rich toast. The daily and weekly minimum requirements for age/grade group K-12 are 1 cup and 5 cups of fruit, respectively. Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.</p> <p>Required Corrective Action: Describe specifically how the daily and weekly minimum requirements for fruit will be met for age/grade group 9-12 for breakfast during the review period (e.g. portion sizes increased or decreased, additional menu items, product replacements, etc.). Per the Food Service Director, 1/2 cup of 100% fruit juice will be planned, offered, and served in addition to 3/4 cups of grapes. No further action required.</p> <p>Finding #12: The daily and weekly minimum requirements for meat/meat alternate (m/ma) were not met during the review period. The following represent the portion sizes planned, offered, and served during the review period:</p> <ul style="list-style-type: none"> • Tuesday: Black bean quesadillas (1.50 ounce equivalent [oz eq]); Nachos with beef (1.25 oz eq) • Wednesday: Deli boardwalk sandwich (1.50 oz eq). • Furthermore, acceptable crediting documentation was not submitted for pork rib shaped patties. <p>The daily and weekly minimum requirements for m/ma for age/grade group 9-12 are 2 oz eq and 10 oz eq, respectively. Repeat findings during subsequent Administrative Reviews will be subject to fiscal action.</p> <p>Required Corrective Action: Describe specifically how the daily minimum requirement for m/ma will be met for lunch during the review period (e.g. portion</p>

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	<p>sizes increased or decreased, additional menu items, product replacements, etc.). Please address black bean quesadillas, nachos with beef, and deli boardwalk sandwich in your reply. Submit updated standardized recipes, as applicable. Submit a product formulation statement (PFS) for pork rib shaped patties. If proper documentation cannot be obtained, discontinue using this product for school meals and submit crediting documentation for a replacement product.</p>
Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	411
Corrective Action History	<p>Finding #13: Recipes for Baked Apples, Buffalo Chicken Wrap, Black Bean Quesadilla, Nachos with Ground Beef, and Deli Boardwalk Sandwich are not standardized to the operation.</p> <p>Required Corrective Action: Submit standardized recipes for these menu items, including serving size for single portion(s), total number of portions, and total volume or measure.</p>
Form Name	Meal Components and Quantities - Review Period (409-412)
Question #	412
Corrective Action History	<p>Finding #14: Kellogg's Rice Krispies cereal, Labriola Baking Co. Roll Dinner Pretzel 1.75 Ounce Heat & Serve Frozen; San Pablo 10" Heat Pressed Flour Tortillas; Yellow Tortilla Chips (12669) are not whole grain-rich products.</p> <p>Required Corrective Action: Discontinue serving these items. Submit crediting documentation (e.g. CN label, PFS, complete nutrition facts label with ingredient statement) or standardized recipes for replacement products, as applicable.</p>
Form Name	Smart Snacks (1104 - 1107)
Question #	1105
Corrective Action History	<p>Finding #15: Nature Valley Oats 'N Dark Chocolate granola bar sold in the food vending machine was determined to be non-compliant with Smart Snacks standards. Furthermore, Smart Snacks compliance documentation was not submitted for numerous products sold in the food vending machine (e.g. Doritos, Jack Links beef jerky, etc.).</p> <p>Required Corrective Action: Submit two to three sentences describing how the SFA and LEA will ensure foods and beverages sold in the food vending machine will meet Smart Snacks standards. Please address the Nature Valley Oats 'N Dark Chocolate granola bar in your reply.</p>
Form Name	Food Safety, Storage and Buy American (1404-1411)
Question #	1411
Corrective Action History	<p>Finding #16: The following products were identified in vending SFA's storage area as non-domestic and not listed on the SFA's Buy American Non-Compliant Product List or SFA equivalent:</p>

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- Villa Frizzoni canola and olive oil blend from Canada, Spain, Tunisia, Greece, Turkey, and/or Morocco
- Mandarin oranges from China

Required Corrective Action: Begin tracking non-domestic products, which may include Buy American information from the vendor or distributor's website. **Provide a copy of the form(s) that will be used and include any noncompliant products.**

Technical Assistance Entries

Comments

Resource Management:

- Revenue and expenditure for non-program foods on the Annual Financial Report (AFR) must be reported. These food include adult meals and extra milks.
- USDA Foods Entitlement Values must be report on the AFR as an expenditure and revenue under NSLP. USDA Foods processing and handling fees must be reported under Purchased Services for NSLP on the AFR. Please reference the "Expenditure Categories" resource on the [Resource Management webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).
- When local officials determine collection efforts for delinquent debt are useless or too costly, the debt must be reclassified as "bad debt." When this uncollectible debt becomes bad debt, it is written off as an operating loss. Food service funds may not be used to cover costs related to the bad debt. These losses must be restored using non-federal funds such as the school district's general fund, so a transfer must be made into the Nonprofit School Food Service Account to cover the loss.
- [Unpaid Meal Charges In a Nutshell](http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf) (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf)
- [Unpaid Meal Charges Guidance](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf) (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf)

Counting and Claiming:

- Visiting students that are enrolled in school may be claimed for reimbursement at the paid rate. Eligibility documentation may be transferred to the host school (e.g. Phelps School District) from the visiting school in order to claim the meal at the free or reduced reimbursement rate, if applicable.

Benefit Issuance:

- All students found on Direct Certification (DC) before the beginning of the school year had an approval date of 9/4/2018 (the first day of school). The BI list must have the exact date of when a student was found on DC or an application was approved.
- SFAs have 10 operating days after receiving a free and reduced application to approve or deny the application. Annualizing income on an application should only occur if multiple incomes are listed at different frequencies. If multiple incomes are listed at the same frequencies (e.g. monthly), the incomes are then added and listed at the single frequency on the back of the application. Ensure the backs of applications are completed, even if the application is denied.

Food Safety:

- If the FSD would like to donate or reserve food items placed on a "No Thank You" table during NSLP, SBP, and ASP service, signage for these items is encouraged to educate students and staff on the purpose of the "No Thank You" table.

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- Shelf-stable items may either be donated or put back into service for NSLP, SBP, and ASP. Time and temperature control for safety (TCS) foods (e.g. milk) may not be put back into service. TCS foods may be donated if held on a cooling mechanism during service.
- Milk must be maintained on a cooling mechanism during service or it must be tossed at the end of service.

Local Wellness Policy:

- All are encouraged to participate in the local wellness committee. This includes, staff, parents, students, and members of the community
- The LWP is to be reviewed annually and a triennial assessment is to be completed every three years. The triennial assessment is to be complete using the WellSAT found on [DPI's LWP webpage](https://dpi.wi.gov/school-nutrition/wellness-policy) (<https://dpi.wi.gov/school-nutrition/wellness-policy>).

Civil Rights:

- The SFA currently has a Civil Rights complaint policy in place. There is a section referencing federally-governed programs and to submit complaints to DPI. This policy should be made clearer to include the School Meals Programs as an example of said federal programs.
- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program. All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within five days. You will want to make sure that this is included in the district procedures to ensure compliance.
 - A 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. Please refer to the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) for assistance in filing these complaints (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf).

On-site Monitoring:

- On-site monitoring forms are to be completed annually for all lunch sites and half of all breakfast sites. These forms are to be completed prior to February 1.

Summer Food Service Program (SFSP) Outreach:

- A goal of USDA School Meals Programs is to ensure all students have access to healthy and nutritious meals year-round. Whether or not an SFA operates summer food service, USDA requires all SFAs 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](https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site) (<https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site>)
 - 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 [USDA Summer Food webpage](http://www.fns.usda.gov/summerfoodrocks) (<http://www.fns.usda.gov/summerfoodrocks>)
- To access an inclusive map of all potential participating sites in your area, see the [interactive map](http://www.fns.usda.gov/capacitybuilder) on the SFSP website (<http://www.fns.usda.gov/capacitybuilder>).
- For more information on Summer Feeding option contact: Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator Phone: 608.266.7124; e-mail: amy.kolano@dpi.wi.gov
- [SFSP Outreach poster](https://dpi.wi.gov/sites/default/files/imce/community-nutrition/doc/Summer%20Food%20Summer%20Fun%20Postcard.docx) (<https://dpi.wi.gov/sites/default/files/imce/community-nutrition/doc/Summer%20Food%20Summer%20Fun%20Postcard.docx>)

Professional Standards:

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- The current food service director is shown as the food service manager within the Professional Standards training tracker. Please review the Professional Standards annual training hour requirements, as directors must have 12 hours of training, whereas managers must have 10 hours of training.

Comments

The Buy American provision was added to the National School Lunch Act (NSLA) by Section 104(d) of the William F. Goodling Child Nutrition Reauthorization Act of 1998 (Public Law 105-336). Section 12(n) to the NSLA (42 USC 1760(n)), requiring school food authorities (SFAs) to purchase, to the maximum extent practicable, domestic commodity or product.

If no country of origin is identified on a label, and country of origin cannot be located on the distributor's online catalog or website, then the SFA must get certification from distributor or supplier stating, "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S." This can be accepted within an email. Alternatively, 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) (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 as defined in 7 CFR Part 210.21(d).

The label should indicate if the product is grown, processed, and packed in the continental U.S. and any U.S. Territories. If the label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.

Comments

There are four pieces of information per non-compliant item that must be recorded on the [Buy American Non-Compliant Product List](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) or SFA equivalent:

1. Date
2. Name of product
3. Country of origin
4. Reason (e.g. cost analysis, seasonality, availability, substitution, distribution, other [explain])

You may record additional information if you find it beneficial.

For more information, visit the [Buy American Provision webpage](https://dpi.wi.gov/school-nutrition/procurement/buy-american) (https://dpi.wi.gov/school-nutrition/procurement/buy-american).

Comments

The [USDA Food Buying Guide for Child Nutrition Programs](https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs) contains yield and crediting information for foods with a standard of identity (in large part, unprocessed foods) (https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs). Fruits, vegetables, and unprocessed grains, meat/meat alternates (m/ma), and dairy can be credited using the Food Buying Guide (FBG). After logging in to the FBG, click on "food items search" and type in a specific food in the "keywords" search box. Many different options may appear. Find the entry that exactly matches your product and click on it for more information (e.g. Peaches, canned, diced, light syrup pack). After clicking, you will be able to view the purchase unit, servings per purchase unit of the Edible Portion (EP), serving size per meal contribution, purchase units for 100 servings, and any additional information about the product.

A webinar presented by USDA Child Nutrition Programs Nutrition & Technical Assistance Branch showcased the new FBG Mobile App and FBG Interactive Web Tool via a demonstration. Learn how to utilize the innovative features of these tools including search and navigation, the ability to compare food yield information, and the ability to create a favorite foods list. Access the [recorded webinar](https://youtu.be/UP_t3D7AYAM) (https://youtu.be/UP_t3D7AYAM) on the [Food Buying Guide Goes](#)

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[Digital! webpage](https://www.fns.usda.gov/tn/food-buying-guide-goes-digital) of the USDA Food and Nutrition Service website (<https://www.fns.usda.gov/tn/food-buying-guide-goes-digital>).

The USDA *Food Buying Guide* for Child Nutrition Programs is also available to download and/or print as a PDF.

Comments

Processed foods that are not listed in the FBG must be accompanied by a PFS or a CN label to sufficiently document meal component crediting. Secure a PFS directly from the manufacturer or save a CN label directly off the packaging.

Food manufacturers continuously reformulate products used in schools. It is important to stay current with these changes and be confident that the documentation on file matches the products in stock. The School Nutrition Team (SNT) recommends maintaining and organizing this information in a manner that is easy to reference and update, such as a binder, file folders divided into categories, or organized as digital files. These records should be reviewed and updated at least twice per year and as new products are purchased or substituted.

State-Processed and USDA Foods Product Information Sheets

Product formulations change frequently, therefore it is important that nutrition facts labels, CN labels, USDA Foods Product Information Sheets (USDA Fact Sheets), and PFS on file are kept up-to-date. State-Processed Product Information is updated annually and can be found:

[SY 2018-19 State-Processed Product Nutrition Information](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wiprocessed-nutritioninfo-1819.pdf) (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/wiprocessed-nutritioninfo-1819.pdf>)

[USDA Foods Product Information Sheets](https://www.fns.usda.gov/fdd/nsfp-usda-foods-fact-sheets) are organized by component and updated as needed (<https://www.fns.usda.gov/fdd/nsfp-usda-foods-fact-sheets>). CN labels can be verified and collected from boxes as products are delivered. Once labels have been collected, keep checking when new shipments arrive to determine if crediting towards the meal pattern has changed.

More information about crediting documentation can be found on the [NSLP Menu Planning webpage](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs), under the Child Nutrition Labels and Product Formulation Statements heading (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning#cnpfs>).

Product specification sheets or marketing brochures, commonly found on distributor websites, cannot be used for crediting meal components.

Comments

A standardized recipe is defined as one that has been tried, tested, evaluated, and adapted for use by food service. It produces a consistent quality and yield every time, when the **exact** procedures, equipment, and ingredients are used. Recipes, including *On, Wisconsin!* cycle menu recipes, must be updated to reflect current practices and products. Standardized recipes exist but may not accurately reflect what happens in the kitchen.

Use the resources on the [Standardized Recipes webpage](http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes), including a checklist for pieces of information needed to standardize a recipe; tools to help analyze the meal component contribution; nutrient analysis tools; and [templates to organize all information once obtained](http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes) (<http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes>, <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc>). The Public Health Nutritionist (PHN) also encourages viewing the webcast, "[What's the Yield with Standardized Recipes?](http://dpi.wi.gov/school-nutrition/training/webcasts#sr)" which guides the viewer through the recipe standardization process (<http://dpi.wi.gov/school-nutrition/training/webcasts#sr>).

[USDA's What's Cooking? recipes](https://whatscooking.fns.usda.gov/) include nutritional and crediting information (<https://whatscooking.fns.usda.gov/>). Although USDA refers to these as standardized recipes, they are in fact quantity recipes. Quantity recipes will only be standardized once they are tried, tested, and adapted to your food service operation.

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Comments

All grains offered and credited in school meal programs are required to be whole grain-rich (WGR). Foods that meet the whole grain-rich criteria for the school meal programs must contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not WGR cannot credit towards the grain component. **Furthermore, enriched grains cannot count as food items towards the breakfast meal pattern.**

The following grain products are not WGR: Kellogg's Rice Krispies cereal, Labriola Baking Co. Roll Dinner Pretzel 1.75 Ounce Heat & Serve Frozen; San Pablo 10" Heat Pressed Flour Tortillas; Yellow Tortilla Chips (12669). USDA has a very thorough [Whole Grain Resource](http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf) that provides tools and tips for identifying whole grain-rich products (<http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>).

The terms "wheat" or "made with whole grains" on a product label do not necessarily mean that a product is WGR. Always check the ingredient list to confirm the first ingredient is a whole grain (and any other grain ingredients in the list are enriched, if not whole. Alternatively, crediting documentation in the form of a PFS may show that the combined weight of multiple whole grain ingredients exceeds the weight of the enriched grain ingredients.

Comments

Crediting information recorded on the standardized recipes and the production records was not consistently in agreement with crediting information on the supporting documentation, such as Child Nutrition (CN) labels, product formulation statements (PFS), or the USDA *Food Buying Guide* for Child Nutrition Programs (FBG).

The following discrepancies were identified in crediting during the review period:

- Buffalo Chicken Wrap (as submitted) – 3 ounce equivalents (oz eq) of meat/meat alternate (m/ma), 3.5 oz eq of grain
- Black Bean Quesadilla (as submitted) – 1.5 oz eq of m/ma, 3.5 oz eq of grain
- Nachos with Ground Beef (as submitted) – 1.25 oz eq of m/ma, 2 oz eq of grain (non-whole grain-rich tortilla chips)

All American Chicken Wrap (as submitted) – 2 oz eq of m/ma, 4.5 oz eq of grain

Comments

The school day is defined as the period from the midnight before to 30 minutes after the end of the instructional school day.

The Smart Snacks Final Rule, published in the Federal Register on July 29, 2016, finalized science-based nutrition guidelines for competitive foods sold on the school campus during the school day. Foods and beverages sold in schools must meet both the general standards and nutrient standards unless the sales qualify for an exemption. More information is available on the [Smart Snacks](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks) webpage (<https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>).

Entrées, snacks, and sides must meet one of the following criteria: be a whole grain-rich product; have a fruit, vegetable, dairy product, or protein food (meat, beans, poultry, etc.) as the first ingredient; or be a combination food with at least ¼ cup fruit and/or vegetable. Nutrient standards should be assessed for the serving size available for purchase and include all accompaniments.

Per the Authorized Representative, the food and beverage vending machines in the cafeteria are stocked by Sparo Coins with compliant products. Smart Snacks Product Calculator printouts are provided to the school food authority by Sparo Coins. Onsite observation revealed multiple products in the vending machines for which printouts were not provided. Please monitor the vending machine and contact Sparo Coins for updated printouts as new or substitute products are stocked. Stapling a complete nutrition facts label with ingredient statement to the [Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator) printout is a best practice (<https://foodplanner.healthiergeneration.org/calculator>).

Furthermore, one product listed in the Alliance for a Healthier Generation Smart Foods Planner and stocked in the vending machine is not compliant per the Smart Snacks Product Calculator. Calories from total fat in Nature Valley Oats 'N Dark Chocolate Crunchy Granola Bars exceed 35 percent.

Administrative Review Report

Phelps School District