

# **SMI FREQUENTLY ASKED QUESTIONS**



**United States Department of  
Agriculture  
Food and Nutrition Service**



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## A LA CARTE SALES

### 1. What is USDA doing, or what do they plan to do, to address the nutritional value of a la carte sales?

USDA is concerned about the prevalence of the sale of foods and beverages outside the school meal programs, including a la carte sales, and is involved in many activities to assist schools in this area. Some of the activities are indicated below:

- USDA has been given the authority to regulate only the sale or service of foods of minimal nutritional value (FMNV) and *only* during meal times in the foodservice area. However, USDA has developed a voluntary school nutrition certification called the HealthierUS School Challenge. This initiative recognizes schools that are making a commitment to follow USDA nutrition guidelines or standards for other foods and beverages served or sold to students outside the school meals programs. The HealthierUS School Challenge standards and criteria can be accessed at <http://teamn nutrition.usda.gov/HealthierUS/index.html>.
- In addition, USDA provides resources to local schools and school districts to encourage local action to improve the school nutrition environment, including all foods and beverages available to students throughout the day on the school campus. These resources include *Changing the Scene: Improving the School Nutrition Environment—A Guide to Local Action*. A new publication, *Making It Happen*, a joint effort of USDA's Team Nutrition and CDC's Division of Adolescent and Student Health provides the success stories of schools that are successfully implementing innovative approaches in offering and selling more nutritious foods and beverages to students and staff.
- USDA is actively involved in providing guidance for local wellness policies. Recognizing the role schools can play in combating childhood obesity, Congress included in the *Child Nutrition and WIC Reauthorization Act of 2004* a requirement that each local education agency (LEA) participating in a program authorized by the *National School Lunch Act* or the *Child Nutrition Act of 1966* establish a local wellness policy by the beginning of School Year 2006-07. These local wellness policies will need to address nutrition education, physical activity, and other school-based activities to promote student wellness.

To help school districts develop wellness policies, the *Reauthorization Act* requires the Secretary of the Department of Agriculture (USDA), in coordination with the Secretary of the Department of Education (ED) and in

## A LA CARTE SALES (Continued)

consultation with the Secretary of the Department of Health and Human Services, acting through the Centers for Disease Control and Prevention (CDC), to make information and technical assistance available, on request, to LEAs, school food authorities, and State educational agencies. Our agencies have come together to establish Local Wellness Policy Web pages, linked from USDA's Team Nutrition Web site at [teamnnutrition.usda.gov](http://teamnnutrition.usda.gov).

- USDA completed gathering data for the School Nutrition Dietary Assessment (SNDA III) in the Spring of 2005. SNDA III is a broad study of the school meals environment and includes a review of the nutrient content of meals and student dietary intake. The study will be available in early 2006.

- 2. In a school with Grades 1-12, reimbursable meals are offered via a traditional steam table or serving counter. The school also has a separate area for a la carte (non-reimbursable) sales where French fries, chicken crispers, burritos, chips, bakery products, etc. are sold. This a la carte area appears to compete against the reimbursable line. Please advise.**

Your observations are correct. Not only is the school hurting their school lunch program by their cafeteria meal structure, but they are probably also hurting their financial bottom line. Every time a student purchases a la carte items instead of a school lunch, the school loses both the lunch reimbursement and the commodity value that would have been received had the student selected a reimbursable school lunch. Schools rarely make sufficient profit from a la carte sales to make up for the loss of both the student reimbursement and the commodity value. In addition, if the reimbursable school lunch line serves meals to only those students from economically disadvantaged families, students approved free or reduced price meals would be overtly identified. The State agency is advised to monitor this situation and provide guidance and technical assistance to the SFA.

## AGE/GRADE GROUPS

### GENERAL QUESTIONS

- 1. Can Pre-Kindergarten students be combined with the K-3 or K-6 group if K-3 or K-6 represents the majority of children in the school?**

Yes—if only one age or grade is outside the established levels, schools that are on NSMP or ANSMP may plan menus based on the nutrient standards for the majority of children. Schools on either a Traditional or Enhanced Food Based Menu Planning approach may use the allowable modification which lets them follow the meal pattern and nutrient standards for the majority of children, if only one age or grade is outside the established levels.

- 2. Can the SFA re-analyze a menu with actual production numbers during the week of the SMI review to validate compliance?**

No. If the SFA/school is operating under NSMP, menus are planned and analyzed based on expected production—actual production numbers are not used for the nutrient analysis. In reviewing the SFA/school implementing NSMP, the State agency must verify that the nutrient analysis was conducted correctly. Part of that verification is determining that the school/SFA is correctly weighting the nutrient analysis or correctly implementing simple averaging. See pages 93-96 of the *Nutrient Analysis Protocols: How to Analyze Menus for USDA's School Meals Programs*.

If the school/SFA is incorrectly conducting the nutrient analysis, the SA should require immediate corrective action and provide prompt technical assistance to ensure that the SFA is implementing NSMP correctly. Because the nutrient analysis is the basis of this menu planning system (i.e., the basis for planning reimbursable meals), it is critical that the nutrient analysis be correct.

If the SFA/school uses a food-based menu planning approach, the State agency generally conducts the nutrient analysis. In this case, the State agency will choose the week for the nutrient analysis and use the production records for the review week for data entry.

Also, an SFA/school using a food-based menu planning approach that analyzes their own menus may want the State agency to accept their nutrient analysis for the SMI review. In this case, the SFA/school must follow USDA's nutrient analysis protocols to conduct the nutrient analysis on the planned menu. The State agency would then validate the SFA's/school's nutrient analysis instead of the State agency conducting the nutrient analysis.

- 3. During the 2004 SMI training, I understood that a school on the Enhanced Menu Planning approach with Grades 5-8 could be included in one nutrient analysis if all students receive the 7-12 meal pattern. The 5<sup>th</sup> grade students**

## AGE/GRADE GROUPS (Continued)

**cannot be served 7-12 meal patterns, can they? Isn't it true that schools can only modify the quantities and nutrient standards for the majority of children in a school, if only one age or grade group is outside the established ages or grades?**

While SFAs have always been able to serve more than the minimum meal pattern, it is not recommended—from either a nutritional point-of-view, (consider the increasing rate of childhood overweight and obesity), or a financial point-of-view (consider the cost and plate waste associated with serving such large portions to all children).

For SFAs/schools that vary portions using the established grades for NSMP/ANSMP or the Enhanced Food Based Menu Planning approach, grades 5-8 would be outside the established grade levels and nutrient standards—grades K-6 and 7-12. Since there would be more than one age or grade group outside the established levels in a school with Grades 5-8, the SFA/school would have to use both the K-6 and the 7-12 nutrient standards.

**4. If the State agency (SA) reviews a school in which there is more than one grade group used for menu planning, must the SA conduct an analysis for each grade group?**

Yes, if more than one grade group is used to plan menus for a school, there must be a nutrient analysis for each grade group. In the example of #3 above, if the school serves the 5<sup>th</sup> and 6<sup>th</sup> graders menus planned using the K-6 meal pattern, and the 7<sup>th</sup> and 8<sup>th</sup> graders menus planned using the 7-12 meal pattern, the SA would need to conduct nutrient analyses on both grade groups should the school be selected for an SMI review.

**5. Why aren't there more grade groups for nutrient analysis for breakfast? Calories for breakfast are too high for K-6.**

USDA has not provided more established age/grade groupings, or meal patterns, for breakfast because most students do not come by age or grade groups to the cafeteria for breakfast. They generally come straight from the bus or other means of transportation right to the cafeteria, making it difficult, if not impossible, for school foodservice staff to adjust portions accordingly. Schools that are on a nutrient-based menu planning approach have the option to customize ages in order to have more age groups for breakfast if the school has the means to serve accurate portions to the various age groups. Although the Traditional approach allows two possible grade groups (Preschool and Grades K-12) for breakfast, the Enhanced approach allows optional larger portions for Grades 7-12.

## AGE/GRADE GROUPS (Continued)

### FOOD-BASED MENU PLANNING QUESTIONS

- 6. If an SFA on a food-based menu planning approach has a K-8 school, can the State agency base the analyses on the K-6 standard for grades K-6 and the 7-8 grades on the 4-12 standard? (If they are using the 4-12 portions size for all).**

The questions for the reviewer to ask are 1) what menu planning approach is the SFA/school is using, 2) is the SFA/school using one or more of the approved food-based *modifications*, and 3) what age/grade groups are being used to plan the menus?

If the school is on the Traditional approach and planning and serving menus that meet Pattern IV (age/grade group 4 – 12) to all grades, then the nutrient standards for that age/grade group (4-12) must be used to conduct the nutrient analysis. However, if the school is using one of the approved modifications to the Traditional approach, e.g., serves the portion sizes for Group IV (grades 4-12) to all students but follows the nutrient standards for K-6 and 7-12, the reviewer would use the K-6 and 7-12 nutrient standards for the school's nutrient analysis, whichever grade group is applicable to the school.

The same rationale applies if the school is on the Enhanced menu planning approach. The State agency would use the K-6 and 7-12 nutrient standards for the school's nutrient analysis.

The State Agency *may not* customize nutrient standards for Food Based Menu Planning.

- 7. When a school on a Food-Based Menu Planning approach is using an age/grade group outside the established age/grade standards due to lunch setup (example, the school on Food-Based Menu Planning is planning menus for Grades K-5 and 6-12 including a change of portions accordingly). How does the SA analyze or should the school be required to change to accommodate the standards?**

If the school is on a food-based menu planning approach, they *must* serve the minimum portions according to the meal patterns for the *established age/grade groups* for Traditional or Enhanced. The State agency must determine whether the school is on Traditional or Enhanced. If the school is on Traditional, are they using the allowable modification for portion sizes and nutrient standards? Are they using the allowable modification for the majority of children (Traditional or Enhanced)? Once the State agency determines what food-based option and modifications the school is using, the SA would use the appropriate nutrient standards to analyze the menus. This is why the SFA/School Profile (SMI-4) of the SMI review forms is so



## AGE/GRADE GROUPS (Continued)

important in assisting the reviewer in gathering sufficient information for conducting the nutrient analysis and conducting the review.

- 8. Can the State agency use a customized Grade 4-5 nutrient standard, rather than the nutrient standards for Grades 4-12, for the second nutrient standard in a K-5 school on Traditional Food-Based Menu Planning that uses the K-3 and 4-12 meal patterns to plan menus?**

State agencies *may not* customize nutrient standards for SMI reviews of SFAs/schools using Food-Based Menu Planning. If the school is on Traditional and plans menus using the age/grade group, K-3, for grades K-3, and the age/grade group, 4-12, for grades 4-5, the SA agency must use the nutrient standards for K-3 and 4-12, respectfully, for the nutrient analysis. If the school uses the 4-12 age/grade group to plan the menus for all the grades (K-5) in their school, the SA must use the nutrient standards for 4-12 in the nutrient analysis. The State agency must always evaluate the school by the nutrient standards applicable to the meal pattern the school is using to plan menus and cannot customize the nutrient standards to the particular grades within the school.

- 9. During the SMI training regarding State conducted nutrient analysis for a school, the statement was made that the reviewer cannot customize analysis using the K-6 grade range for a school using the Traditional grades 4-12 meal pattern. Page 8 of the Nutrient Analysis Protocols (NAP) states this is an allowable modification. Please clarify.**

The *SFA may choose* to use the regulatory modification which allows the SFA/school on Traditional Food Based Menu Planning that uses the portion sizes for Group IV (grades 4-12) to plan meals for *all* students and to use the nutrient levels for grades K-6 and 7-12 (from the Enhanced Food Based). The State agency may require prior approval before an SFA/school can choose this modification or may establish guidelines for use of the modification. The SFA/school should always check with the State agency prior to making this decision.

In conducting an SMI review and nutrient analysis of the school's menus, the State agency must use the appropriate nutrient standards for the age/grade group (and possible modification) used by the school for menu planning.

## AGE/GRADE GROUPS (Continued)

### NUTRIENT-BASED MENU PLANNING QUESTIONS

- 10. When monitoring schools using NSMP, if the planned lunch menus have been analyzed for K-12, can the reviewer re-analyze the menus for ages 7-12 or higher to ensure sufficient nutrient intake?**

The SFA/school is not correctly implementing NSMP if they are analyzing lunch menus for grades K-12 as one group. The State agency must require immediate corrective action if this has occurred. The menu planner must use at least two grade or age groups when planning lunches for students in Grades K-12 (at a minimum, the K-6 and 7-12 grade standards must be used). Corrective action must consist of reanalyzing the menus using appropriate nutrient standards and making modifications of menus as necessary to meet the nutrient standards.

- 11. In a high school on NSMP, the planned breakfast menus have been analyzed using the K-12 nutrient standards. Can the reviewer re-analyze the menus using the grades 7-12 nutrient standards to ensure sufficient nutrient intake?**

No. If the school/SFA is correctly implementing the K-12 grade group for breakfast, the SA reviewer must validate the school's/SFA's nutrient analysis. After validating the school's/SFA's nutrient analysis, the reviewer may reanalyze the menus using the additional grade group, but the results can only be used for technical assistance.

- 12. Can a K-8 school using NSMP use the K-6 established grade group and customize the age group of 12-13 years to analyze the 7-8 grade lunch menus? Or can they use a customized grade/age group of K-8?**

It is always preferable to use consistent procedures. Consistency prevents errors in conducting and monitoring the nutrient analysis. For the lunch menu, the SFA must plan menus for a minimum of **two** age/grade groups. The school can achieve the results they are after by *customizing ages* for grades K-6 (ages 5 to 11) and customizing ages for grades 7-8 (ages 12 and 13).

## CN DATABASE AND USDA-APPROVED SOFTWARE

- 1. During training, we were encouraged to update our nutrient analysis software with each new Child Nutrition (CN) Database revision. How often is the CN database revised? How do I determine what revision is currently being used?**

The CN Database is generally revised annually. You may determine the most recent version that is being used by logging onto <http://schoolmeals.nal.usda.gov/Software/index.html> and reviewing the information about the CN Database. This Internet address is case sensitive; you must enter it exactly as shown.

- 2. Does USDA provide a list of current USDA-approved software?**

The list of approved software is available at <http://schoolmeals.nal.usda.gov/Software/index.html>. This Internet address is case sensitive; you must enter it exactly as shown.

- 3. Whom do we contact to identify issues or discrepancies with nutrient analysis software and/or the USDA CN Database?**

Contact us. You can email us at [schoolmeals@nal.usda.gov](mailto:schoolmeals@nal.usda.gov). Please describe the issue/problem in detail so we can take the appropriate action.

- 4. Is USDA considering evaluation of Point of Service software and creating a list of approved software?**

Not at this time.

- 5. Has this training been given to the software companies? In order for them to serve us, they need to have the same information.**

Yes, the exact SMI Training was provided to the USDA-approved software vendors during the summer of 2004.

- 6. Why is there such a large discrepancy between the fat content of (deep fried) French fries in the USDA CN Database and that calculated from the % fat change (+ 3.5%) from appendix H in the Nutrient Analysis Protocol?**

There are two possible answers:

- There are many commercially prepared French Fries in the CN Database, all with different nutrient profiles based on the different manufacturing processes used, OR
- Values for the “Common Moisture & Fat Change” (from Appendix H) are for “Purchased Prepared Foods That are Fried.” Commodity data in the CN Database are for a “partially pre-fried product that is oven-heated. (See CN Codes 11403

## CN DATABASE AND USDA-APPROVED SOFTWARE (Continued)

and 11804.) If this product is prepared by deep fat frying, the moisture and fat changes from Appendix H would apply.

**7. Doesn't the software already do fat/moisture changes for generic items, such as burritos, automatically?**

Food items that are in the CN Database “as prepared,” “cooked,” or as “served” will already have accounted for the negligible moisture and fat changes that occur if the product is only reheated. As long as no additional fat is added in preparation, the cooked product is the appropriate item to use. The CN Database contains some fried food items that reflect moisture loss and fat gain which occur during deep-frying. If a commercially prepared product, which will be deep-fried, is served and it is not in the Database, the menu planner will need to create a recipe that can be adjusted for moisture losses and fat gains that occur with frying. However, if the Nutrition Facts Label or the manufacturer has provided “as served” data using the method of cooking, the type of fat, and/or other preparation used in the school kitchen, the food item can be entered directly into the ingredient database.

**8. In the next release of the CN Database included in the vendor software, will USDA incorporate the validation of data entry done by the vendor? This would address the problem mentioned several times during the training.**

All nutrient profiles of items added to the Child Nutrition Database by the contractor are validated. FNS is considering the feasibility of reviewing vendor-added “extras” to the nutrient analysis software for school programs.

**9. Most SFAs steam frozen vegetables. Is this going to be added to the CN Database?**

The CN Database incorporates the nutrient analyses of selected food items in USDA's Agriculture Research Service (ARS) *Standard Reference Nutrient Database*. Currently, this standard reference database only provides nutrient analyses on boiled vegetables. FNS will be exploring with ARS the possibility of adding steamed vegetables to the database.

**10. Have the pen and pencil Food Buying Guide changes been incorporated into the most recent CN database?**

Yes.

## **CN DATABASE AND USDA-APPROVED SOFTWARE (Continued)**

### **11. What should be done when a food item or ingredient from USDA-approved software doesn't have all of the nutrient data?**

Contact us. You can email us at [schoolmeals@nal.usda.gov](mailto:schoolmeals@nal.usda.gov). Please describe the issue/problem in detail so we can take the appropriate action.

## CONTRACTS

### 1. Can you provide a prototype contract for an SFA to use when contracting for nutrient analysis?

USDA does not provide prototype contracts because each procurement is different based on the needs of the SFA, and because most States have procurement regulations that go beyond Federal requirements.

Any solicitation (invitation to bid, request for proposal or small purchase procedure) or contract for nutrient analysis should address and clarify the following issues:

- Assurance that all procurement documents are developed in accordance with applicable State procurement rules.
- The resources, information, etc. that will be provided by the SFA
- Minimum qualifications of person conducting the nutrient analysis:
  - Expertise in planning menus for school-aged children
  - Expertise in nutrition and food preparation, preferably in school foodservice operations
  - Experience and expertise in conducting nutrient analysis
- Training on SMI regulations/policy/guidance and on USDA menu planning requirements
- Number of nutrient analyses required
  - Centralized menus or individual schools
  - Number of age/grade groups
- Scope of the nutrient analysis
  - Timeframe – cycle menus
  - Meal Type – Lunch and/or Breakfast
- Use of weighted or simple averages
  - If weighted averages and central menus, how will planned production data Be aggregated, who will aggregate
- Required use of USDA-approved computer software; how often the software is to be updated
- Required use of *Nutrient Analysis Protocols: How to Analyze Menus for USDA's School Meals Programs*
- Who will provide computer hardware and software
- Types and forms of completed nutrient analysis reports
- Requirements to re-analyze menus
  - Menu changes
    - Menu substitutions
    - Product changes
    - Student selection changes (for weighted analysis)
- Delivery date or timeline for completed nutrient analyses
- Termination Clause
  - Ability to terminate contract if contractor is unable to deliver products as specified.
  - Ability to terminate contract for convenience.

## CONTRACTS (Continued)

- Contractor's liability for inability to deliver quality product
- For RFP, must include criteria for evaluation of RFP
- If the SFA is contracting for Assisted Nutrient Standard Menu Planning, additional requirements listed in 7 CFR Part 210.10(j) should be addressed, along with when/how menu changes for substitutions outside the two-week window and changes for holiday meals/other special meals will be handled.

The above list is not inclusive. Each contracting entity should develop their own procurement documents, including contracts, to ensure delivery of the desired product. Always consult with your legal advisor during this process.

School food authorities cannot contract away the responsibility for the accuracy of the nutrient analysis or for accurate implementation of their menu planning system. The SFA must provide proper monitoring and oversight of the contract to ensure that the contractor meets the terms of the contract.

### **2. What about the contract for a State agency to use when contracting for nutrient analysis, on-site reviews, and/or other elements of an SMI review?**

Any solicitation (invitation to bid, request for proposal, or small purchase procedure) or contract for State agency SMI review activities (including nutrient analysis, on-site reviews, development of guidance for corrective action, preparation of corrective action plan, etc.) should address and clarify the following issues:

- Assurance that all procurement documents are developed in accordance with applicable State procurement rules.
- The resources, information, etc. that will be provided by the SA
- Minimum qualifications of person conducting the nutrient analysis:
  - Expertise in nutrition and food preparation, preferably in school foodservice operations
  - Experience and expertise in conducting nutrient analyses
- Training on SMI regulations/policy/guidance
- Scope of the nutrient analysis
  - Review week
  - Meal type: lunch and/or breakfast
- Number of nutrient analyses required
  - Number of schools
  - Number of age/grade groups
- Required use of USDA-approved nutrient analysis software; how often the software is to be updated.
- Required use of *Nutrient Analysis Protocols: How to Analyze Menus for USDA's School Meals Program*.
- Who will provide computer hardware and software?

## CONTRACTS (Continued)

- Who will collect/verify data for the nutrient analysis?
- When will the nutrient analysis be conducted—before, during or after the on-site visit?
- Who will communicate with the SFA? How will communications be handled?
- On-site visits
  - Scope of the visit
  - Scheduling of on-site visits
- Other elements of SMI reviews
  - Spell out every task to be accomplished, timelines, special skills/knowledge needed, etc.
- Coordination between analyses, on-site review, and CRE
- Types and forms of completed reports
- Delivery date(s) or timeline(s) for completed reports
- How/when will the contractor be paid?
- For RFP, must include criteria for evaluation of RFP

State agencies cannot contract away the responsibility for the accuracy of the nutrient analysis/SMI review and for monitoring/providing oversight of the contract to ensure that the contractor meets the terms of the contract.

### **3. Is there a list of contractors that SAs are using to perform their nutrient analyses/SMI reviews that can be used by other SAs to send RFP/ITB and salient bids on a contract?**

USDA does not endorse or recommend contractors. State agencies may contact other State agencies to discuss recommendations.

### **4. When an SFA contracts for ANSMP with an outside entity, is an RFP/ITB required?**

Regardless of the value of the contract, a competitive procurement is always required. Depending on the anticipated value of the contract, the SFA will use either a formal procurement [request for proposal (RFP) or invitation to bid (ITB)] or small purchase procedures. If the contract will exceed the lower of the applicable State or local small purchase threshold or \$100,000, the SFA will use formal procurement, either an RFP or ITB. All purchases of services, materials, or supplies that fall below the applicable small purchase threshold can be bid informally. School food authorities cannot contract away the responsibility for the accuracy of the nutrient analysis and for monitoring/providing oversight of the contract to ensure that the contractor meets the terms of the contract.



## **CONTRACTS (Continued)**

Whether formal or informal, the SFA must follow applicable State and local rules for all of its procurements. When any State or local requirement is not as strict as the Federal requirement, the SFA will substitute the stricter Federal requirement.

Generally, an ITB, which is used with sealed bidding, is appropriate when the services required can be adequately specified and the only difference between responsible, responsive bidders will be price. An RFP, used in the competitive negotiation method of procurement, is appropriate when outcomes can be described, but there is more than one way to achieve those outcomes.

Consult with your State agency to identify the aggregate dollar amount for small purchases and formal bid procedures. Also, you will need to find out if your State rules permit only ITBs.

## FISCAL ACTION

### **1. Will there ever be fiscal action for noncompliance to SMI guidelines?**

State agencies have the authority to take fiscal action if a SFA is not acting in good faith to operate the program in compliance with SMI requirements. 7 CFR 210.19 (a)(1)(vii) requires the State agency to determine if a disallowance of reimbursement funds [as authorized under 7 CFR 210.19(c)] is warranted. In addition, State agencies, at their discretion, may withhold program payments until such time as corrective action is completed, when SFAs/schools fail to act in good faith to promptly bring programs into compliance.

### **2. In the second SMI review cycle, will fiscal action for noncompliance increase?**

Fiscal action for noncompliance is dependent on the degree of noncompliance and other factors as determined by the State agency; the State agency may consult with their FNS Regional office, if warranted. As discussed in the answer to question 1, the regulations provide State agencies with the authority to take fiscal action they determine is warranted by a school food authority's failure to act in good faith to comply with the terms of an SMI corrective action plan.

### **3. What or who determines any fiscal action for an SMI review? Regulations indicate fiscal action may be taken for noncompliance with SMI. Is FNS going to provide State agencies with a quantified type of format to determine/calculate such fiscal action? For example: If analysis shows 32% fat what would be the fiscal action, if any?**

Federal regulations for SMI give authority to the States to take fiscal action for an SFA's repeated failure/refusal to comply with the nutrition requirements for school meals. State agencies have the responsibility to determine when a school food authority is not acting in good faith to complete the terms of their corrective action plan. If the State agency determines that an SFA is not acting in good faith, they must then determine if fiscal action is warranted. State agencies may consult with their FNS Regional office, if warranted, to discuss taking fiscal action in relation to an SMI review. FNS is not planning to establish any formula for calculating the level of fiscal action. FNS continues to maintain that this is best determined on a case-by-case basis.

### **4. If the State agency is going to disallow meals for noncompliance of corrective action for SMI, how do they determine the number of meals to disallow? Do they disallow the whole month's claim? For example, noncompliance to lowering fat or increasing fruit/vegetable—broad corrective action items.**

Again, the State agency has flexibility in determining the number of meals to disallow. For example, if a month's cycle menus (and the resulting meals) are clearly out of compliance with the nutrient standards, the State agency may want to consider

disallowing all meals for that month. However, if only one week's menus (and the resulting meals) were determined deficient, it is reasonable to consider that week for disallowance.

## FOOD OR MENU ITEMS

### 1. Please provide examples of fortified foods versus whole foods.

Examples of fortified foods include orange-flavored gelatin fortified with vitamin C or a 10% juice drink fortified with vitamin C, etc. These are both examples of fortified foods with little other nutrients. A whole food would be a fresh orange.

### 2. In a school on a nutrient-based menu planning approach, what determines an entrée? What would be allowed as a minimum portion size?

The menu planner determines the entrée. The following are examples of an entrée:

- Weiner with Bun
- Weiner\*
- Hamburger Patty with Bun
- Hamburger Patty \*
- Baked Turkey with Cornbread Dressing
- Baked Turkey\*
- The full salad bar (must establish minimum serving size)
- Separate designated food(s) on a salad bar.

\* Weiner and hamburger patty are offered without bun; baked turkey, without dressing. In these examples, buns and cornbread dressing could be served as side dishes.

Because in NSMP/ANSMP the entrée must always be selected, it is wise for menu planners to plan several variations that would encourage student selection, such as wiener only, wiener on a bun, wiener on bun with chili and cheese.

In addition, the menu planner must determine the portion size for all menu items. The portion size must be appropriate to the food item and to the age/grade group for whom the menu is being planned; it must also be appropriate to the meal and its nutritional content.

The menu planner establishes a *minimum* portion size for any item that is self-serve. The minimum portion size should be an amount that is reasonable for that menu item. For example, the minimum portion size for an entrée salad bar in one SFA might be one cup; another SFA might set the minimum portion size at two cups; anything smaller than one cup would be deemed insufficient for an entrée salad. The minimum portion size lets the student and the cashier know the minimum amount that must be taken for the menu item to count toward a reimbursable meal for Offer versus Serve.

### 3. Most schools now offer several menu choices. When evaluating whether a school has correctly implemented a food-based system, how do you determine whether they have offered the required weekly total of servings of grain/bread (G/B)?

## FOOD OR MENU ITEMS (Continued)

When there is a choice of two or more different lunch menus, credit for the larger-sized G/B serving that is available to students should be given for the day. This means that this larger-sized G/B serving will count toward the weekly requirement.

However, every serving line must offer at least the minimum serving of G/B to students each day.

Example:

Self-serve Salad Bar - 8 saltine crackers	=	1 G/B
Deli line - Hamburger on Bun	=	2 G/B

The 2 G/B will count toward the weekly serving requirements for G/B.

- 4. What are the differences in the Meat/Meat Alternate (M/MA) requirements for the Traditional or the Enhanced Food-Based Menu Planning approaches using the allowable M/A modifications when compared to the same SFA/school not using the M/MA modifications?**

An SFA/school on one of the food-based menu planning approaches, Traditional or Enhanced, may use the M/MA modification, which bases the M/MA component on the weekly total for the appropriate age/grade group. This weekly total must, at a minimum, equal the number of serving days in the week multiplied by the meal pattern daily requirement. When more than one M/MA is planned, the greater amount is counted toward the weekly requirement. However, all meals must offer at least 1 oz. M/MA daily.

- 5. During this training, one of the States indicated they were allowing the 10 oz per week meat/meat alternate modification to the food-based menu planning approaches. Has this reduced the calories, iron, vitamin A, etc. in the SMI reviews for those schools? Our State is concerned that the modification would not meet the SMI nutrient targets.**

First, all States must allow the use of the M/MA modification for food-based menu planning. The SA may require that the SFA obtain prior approval before implementing the modification or they may develop guidelines for use of the modification.

While the M/MA modification for Food-Based Menu Planning allows schools to vary the amount of M/MA offered each day (it still requires a minimum of 1 oz. M/MA per day for each entrée item), it makes no change to the total amount of M/MA that must be offered over the school week. The weekly requirement for the M/MA component varies based on the age/grade group in the Food-Based Menu Planning options. The M/MA modification does not change the SMI nutrient standards, which

## **FOOD OR MENU ITEMS (Continued)**

are averaged over the school week. As long as the menu planner does not overuse the prerogative by planning smaller amounts of M/MA for too many different entrée items, schools should have no difficulty in meeting the nutrient standards for calories, iron, protein, vitamin A, etc.

**6. Since FDA made 2% milk a reduced fat product, does that mean it does or does not meet the requirements for lowfat milk in NSLP?**

FNS issued a memo around the time FDA made its changes explaining the new names. Effective July 1, 2005, regulations/law require that schools offer fluid milk in a variety of fat contents. Schools are encouraged to offer fat-free and/or 1% milk as milk choices.

## **FOOD PRODUCTION RECORDS**

### **1. If an SFA develops its own food production record forms, what information must they contain?**

The SFA should determine if its State agency has developed prototypes for food production records that can be used. If the State agency has not developed any prototypes, USDA's *A Menu Planner for Healthy School Meals*, Chapter 7, has some examples of food production records for food-based and nutrient-based menu planning approaches.

Regardless of the type of menu planning approach that you have chosen, all production records must include the information discussed below for the purposes of nutrient analysis:

- Planned number of meals by age or grade group for students; number of adult/other meals planned.
- All planned menu items, including all choices, types of milk, and desserts. All condiments served as part of the reimbursable meal, including gravy, butter, margarine, mayonnaise, relish, ketchup, mustard, salad dressing, etc.
- Serving or portion sizes of each planned menu item or condiment for each age or grade grouping.
- Documentation of substitutions and leftovers.
- If menus are planned for more than one age or grade group at one school building, portion differences must be clearly indicated on food production records.
- Planned number of portions (servings) of each menu or food item and for each age/grade group to be served; include planned a la carte sales in the planned portions.
- Total amount of food actually prepared for each food item or menu item.
- Actual number of reimbursable meals served.
- Actual number of non-reimbursable meals (meals served to foodservice staff, adult meals, second meals served to students).
- For any menu items that are also sold a la carte, clearly indicate the number of portions for student meals and the number of portions for a la carte and adult meals.
- If foods are deep-fried, the type of fat used for frying.

### **2. What are some suggestions to offer SFA's on how to separate a la carte food items from reimbursable meal items when all items are offered on the same serving line so that nutrient analysis is done correctly? Should a la carte food items be included in production records?**

## FOOD PRODUCTION RECORDS (Continued)

Nutrient analysis is conducted only on foods planned for reimbursable school meals. When foods are planned and prepared for *both* reimbursable meals and a la carte sales, it is necessary to identify the number of servings or amount of the food planned for both—on the food production records.

USDA recognizes that this is not an easy task and takes consideration, planning and time. Some point-of-sale software programs now have the capability of maintaining records for food items served in a reimbursable meal and food items sold a la carte. This would be very important software feature for a large school foodservice operation. In a small foodservice operation, where there might not be as many a la carte sales, the maintenance of the number of servings for a la carte sales may be achieved by manual counting and recording.

If individual food or menu items are planned *solely* for a la carte and are not planned as part of a reimbursable meal, it may not be necessary to track these items on the production records. For example, if a specialty bread is only offered a la carte and not part of the reimbursable meal, it is not necessary for the nutrient analysis that this a la carte item be recorded on the production record. However, SFAs and/or State agencies may require that a la carte sales be documented on food production records for accountability purposes.

### **3. When it is necessary to substitute a menu item, why is the SFA/school required to document what was substituted and the date of the substitution?**

Under NSMP/ANSMP, reimbursable meals are determined using the nutrient analysis to plan meals that meet the age/grade appropriate nutrient standards when averaged over a school week. It is understood that an SFA/school, using NSMP/ANSMP, may need to make an occasional food or menu item substitution after the nutrient analysis of the menus has been conducted because of food shortages, delivery problems, etc. Federal regulations, 7 CFR Part 210.10(i)(10), require that if the SFA/school becomes aware of the need to make substitution(s) on the analyzed menu outside a two-week window before the planned menu is served, menus must be re-analyzed. If the need for a substitution becomes known within a two-week window, a re-analysis is not required. The two-week window is defined as the two weeks prior to the date the menu is served.

Documentation of each substitution, the date of the substitution, and the date when the need for a substitution became known are required to determine if the substitutions fall outside of the two-week window and if the menus should be reanalyzed. The substitutions, dates of substitutions, and dates the need for a substitution became known can be recorded on substitution forms, planned menus, or partially prepared food production records (to be completed on the production day).



## **FOOD PRODUCTION RECORDS (Continued)**

It is recommended that along with substitution documentation, procedures be developed to ensure that substitutions are made only in emergency situations and the SFA's central office gives approval before schools can make any menu substitutions.

In addition, the substitution must fulfill the same role in the menu (entrée, side, fluid milk) and should be a similar food (from the same food group).

It should be noted that when schools using food-based menu planning conduct a nutrient analysis of their menus and want the State agency to accept their nutrient analysis during an SMI review, they must also follow the substitution procedures described above.

## FOOD SAFETY

- 1. During an SMI review, should the State agency conduct a food safety inspection? Can this inspection consist only of ensuring that all violations on the most recent food safety inspection have been corrected?**

The optional prototype SMI form, Food Safety Checklist, was introduced at the national SMI training. It is an optional form that State agencies can use as a tool to document how well a school is meeting safe food storage and handling practices. Or State agencies may choose to use one they developed based on State and local health codes.

In 2004, Congress passed the Child Nutrition Programs Reauthorization Act, Public Law 108-265, in which the number of health inspections for schools increased to two inspections annually, and SFAs are required to have food safety systems based on HACCP systems. FNS has developed the resource, *Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP*, to assist schools in developing and implementing a food safety plan. Download this guidance from the following website, <http://www.fns.usda.gov/cnd/Lunch/Downloadable/HACCPGuidance.pdf>.

## **MENU PLANNING APPROACHES**

### **1. What are the current statistics as to the numbers of schools using NSMP vs ANSMP vs FBMP?**

In SY 1998-99, USDA sponsored the Second School Nutrition Dietary Assessment Study (SNDA-II). Data from this study indicated that 69 percent of all schools used one of the two food-based menu plan approaches (41% Traditional and 28% Enhanced). The nutrient-based menu planning options were used by 27 percent of all schools (24% NSMP and 3% ANSMP.) Four percent of the schools used an alternate menu planning approach, i.e., “any reasonable approach” as allowed by law and regulations.

### **2. In those states allowing Any Reasonable Approach, how has the change affected calories in the schools’ SMI? Or any other nutrients?**

Meals planned under an alternate menu planning approach (Any Reasonable Approach) must still meet the nutrition standards for the appropriate age/grade groups.

## NUTRIENT ANALYSIS

### SIMPLE AVERAGE ANALYSIS

- 1. The waiver that allowed simple averaging has been extended by Congress. When does this waiver end?**

Public Law 108-265 (June 30, 2004) amended Section 9(f)(5) of the Richard B. Russell National School Lunch Act by extending the waiver of the requirement to conduct weighted averages through September 30, 2009. State agencies and school food authorities may choose to use weighted or simple averaging in conducting nutrient analyses for SMI through September 30, 2009. The law does not preclude a State agency from requiring weighted averages for nutrient analysis.

- 2. Is it necessary to aggregate data using simple averaging?**

No. Aggregating data for planned production is necessary only if an SFA implementing NSMP/ANSMP is using weighted averaging for nutrient analysis for planning central menus (school district-wide rather than school-by-school).

- 3. Can you please briefly review the procedure for conducting simple averaging?**

The complexity of simple averaging depends on the number of choices provided within the menu. If an SFA/school serves menus with no choices other than milk, simple averaging can be accomplished by entering "1" as the number of meals and entering each menu item as 1 serving but still must do at least a simple-averaged recipe for milk.

Follow the steps below to calculate the planned number of menu items that would accomplish simple averaging related to the number of choices:

- Use a number for planned or projected meals that is evenly divisible by the number of menu item selections within all of the menu choice groupings (for example, the number 300 works for up to 6 choices). This number should be consistent from day-to-day during each school week.
- Divide this number by the number of selections within the menu choice grouping.

Example: If four fruits and vegetables are offered, divide 300 by 4 = 75.

- Multiply this number (75) by the number of menu items the student may select.

## NUTRIENT ANALYSIS (Continued)

Example 1: The student may select 1 fruit or vegetable. Multiply 75 by 1 = 75. Enter 75 for the planned number of menu items for each fruit and/or vegetable in the menu choice grouping.

Example 2: The student may select 2 fruits and vegetables, multiply 75 by 2 = 150. Enter 150 for the planned number of menu items for each fruit and/or vegetable in the menu choice grouping

### **4. When simple averaging is used to analyze meals, must you use simple averaging in preparing a recipe for milk?**

Yes. If the nutrient analysis is performed using simple averages, all shortcut data entry recipes must be created using simple averaging, i.e., a recipe for milk must give each type of milk equal weight. In the example above, a milk recipe for 3 milk choices would be equally weighted for simple averages—the number 3 can be used for the number of servings in the milk recipe so that the 3 types of milk can be equally weighted. If the recipe is for 3 servings, then each type of milk would be for 1 servings: (1) nonfat, (1) 1% unflavored and (1) 1% chocolate. When the recipe is used in a menu, the total meals would be entered as the number of servings because simple averaging is calculated based on the premise that every child can choose every item.

### **5. Can a school district on food-based menu planning use simple averaging?**

An SFA using food based menu planning (FBMP) is not required to conduct a nutrient analysis of its menus. However, 1) if an SFA using FBMP is conducting its own nutrient analysis, 2) wants the State agency to accept the nutrient analysis for the SMI review, and 3) the State agency has approved simple averaging for nutrient analysis, the SFA may use simple averaging and must follow the *Nutrient Analysis Protocols*.

## **WEIGHTED AVERAGE ANALYSIS**

### **6. Please comment on weighting in a recipe versus weighting menu items. For example, an SFA's milk recipe for 100 has the various types of milk selected by the students weighted by percentage of usage—(10) nonfat, (15) 1% unflavored, and (75) 1% chocolate. It seems like then weighting the menu item in the menu would over-correct.**

The milk “recipe” just described is actually a “shortcut data entry” for milk usage for the menu. The milk “recipe” is based on a review of past milk usage to determine average usage of each type of milk. Once this weighted “recipe” has been established

## NUTRIENT ANALYSIS (Continued)

for the SFA or school (depending on what level the nutrient analysis is conducted), the menu planner or reviewer enters the number of total servings of the milk “recipe”,

as a menu item, planned for students. The milk “recipe” will then weight the various types of milk planned for this number of students.

**7. How should weighted analysis be completed for schools using Provision I, II, or III, when they do not do counts by grade group for estimating planned quantities?**

Provisions I, II, and III reduce application burdens and simplify meal counting and claiming procedures. This is a separate issue from estimating the number of students in each age or grade group for menu planning and food production purposes. A school using one of the Provisions must still plan menus and base food production according to the age/grade groups established for the menu-planning approach used by the school.

**8. When weighting milk for weighted averaging, what records should be used?**

Past student selections as documented on the food production records are the preferred source to identify the number of milk servings in weighted averaging. If milk invoices are used to determine projected servings for weighted averaging, the SFA must subtract the number of a la carte milk sales and sales for other meals from the invoice numbers. Milk invoices may be used to develop a weighted shortcut data entry “milk recipe,” in which percentages of milk types reflect the percentages of milk types selected by students. The menu planner should estimate the numbers of milk sold a la carte and for other meals.

**9. The regulations state that nutrient analysis for NSMP/ANSMP is based on planned servings, yet during training it was emphasized that State reviewers validating an SFA’s centralized weighted nutrient analysis should review the number of servings based on prior production records for the same week of the cycle. This record will reflect the number of servings actually served. Which number should reviewers use—planned servings or number of servings selected?**

Reviewers should always use planned number of servings, and the planned number of servings must be based on data in past documents, such as food production records. This means that menu items or foods more frequently offered (selected) are weighted more heavily than those not offered (selected) as often. The number of planned servings of a menu item must therefore be based on the history of selections. The SFA derives the history of students’ selections from reviewing past food production records.

## NUTRIENT ANALYSIS (Continued)

### SFA – NUTRIENT ANALYSIS

- 10. A SFA/school that is on NSMP has committed to including seasonal fresh fruit in school meals several times a week. However, fresh fruit is very perishable and prices often fluctuate, therefore the SFA cannot predict with accuracy exactly which fruit will be offered during any week of the menu cycle. Is there some type of shortcut weighted average recipe that can be used by the SFA/school for the nutrient analysis of meals that include seasonal fresh fruit?**

Schools are strongly encouraged to include fresh fruits and vegetables often in school meals because of the vitamins, minerals, phytonutrients, and fiber they provide. USDA understands the problem of fluctuation of the types of seasonal fresh fruit. Although not absolutely reflective of the nutritional contribution for each particular type of fruit, for ease in conducting nutrient analysis of constantly changing seasonal fruit, USDA will allow SFAs/schools to develop seasonal fruit shortcut data entry recipes.

To use this option, an SFA/school would develop and use seasonal fruit recipes that correspond to the fruits that are available to the school during the various seasons of the school year. Examples are winter, fall, spring, and summer recipes, but may be more specific such as early summer and late summer recipes. Each recipe would contain only those seasonal fruits that the SFA/school pre-selected and authorized to be purchased and used in the specific recipe.

Occasionally, a school may not be able to obtain all the fruits that are a part of a seasonal recipe when it is on the menu. In this instance, the school may use those fruits in the recipe they are able to acquire. However, schools should strive to offer all of the fruits in the seasonal recipes or at least a majority of fruits in the recipe. For example, a winter recipe may include bananas, apples, oranges, and grapes. Offering only bananas every day would not provide the nutrients in the weighted seasonal fruit recipe.

Each school year, seasons would need to be defined by dates that coincide with school days. During the first menu cycle of the season, the SFA would estimate usage of the pre-selected seasonal fresh fruits to be used in adjusting the seasonal recipes; after the first cycle, the SFA would weight each recipe based on percentages of fruit purchased by the SFA during the period and use the adjusted recipe in the nutrient analysis, making menu changes if needed to meet the nutrient standards. At the end of each season, the SFA would use total seasonal purchases to establish the percentage to be used for that season during the next school year.

## NUTRIENT ANALYSIS (Continued)

### **11. What are the advantages/disadvantages of planning central menus for SFAs using NSMP/ANSMP?**

The most important advantage is that only one set of central menus is planned and analyzed. The SFA conducts nutrient analysis for each menu for each age/grade group, resulting in fewer nutrient analyses than if each school's menus for each age/grade group had to be analyzed. For example, a small school district has five K-12 schools. They use two age/grade groups for menu planning for lunch—K-6 and 7-12. If they are on central menus, there would be two menus to plan and analyze. If schools are allowed to plan their own menus, the school district would be responsible for planning and analyzing ten menus for lunch (two for each school).

The disadvantages are that (1) once the menus are planned, all schools must follow the appropriate central menu(s) exactly, and (2) if the SFA is using weighted averaging, the menu planner must aggregate or consolidate planned production data for reimbursable student meals for each menu item for each age/grade group for all schools using the central menu.

### **12. When should an SFA use aggregated data to conduct a nutrient analysis? Why aren't the data from one school's menu sufficient?**

An SFA implementing NSMP or ANSMP and using centralized menus with weighted analysis must aggregate (consolidate) planned production data. In addition, an SFA on a food-based menu planning approach that conducts their own nutrient analysis using weighted analysis, plans central menus, and wants the SA to use this analysis, must aggregate their data.

Data from one school is usually not reflective of the entire school food authority; therefore, SFAs planning central menus, based on weighted nutrient analysis, must aggregate the planned production data for student meals for each age/grade group for all schools using the central menu. That is, an SFA will aggregate or consolidate the planned number of menu items (menu items planned based on past history of student choices, i.e., food production records) for each age/grade group when the SFA:

- is on NSMP or ANSMP *or* is on a food-based menu planning approach and wants the State agency to accept its analysis,
- plans and analyzes central menus, and
- uses weighted averages of menu items for conducting the nutrient analysis.

If the State agency is evaluating or validating a SFA's weighted nutrient analysis of centralized menus, the State must ensure that the weighting was done accurately, i.e. based on the accurate aggregation of planned production for reimbursable student meals for each menu item in the menu for each age/grade group.



## NUTRIENT ANALYSIS (Continued)

### **13. Explain again how an SFA would aggregate data for nutrient analysis of central menus.**

To determine how much to plan for reimbursable student meals, the SFA looks at the previous history of servings prepared and selected by students for each menu item at each school that uses the same menu (portions and menu items). If previous data for a menu item includes items planned for adults and a la carte sales, these numbers must be subtracted from the total to look only at items for reimbursable student meals. Then the SFA must determine if the amount produced for student meals needs to be increased, decreased, or remain the same (e.g., did the school run out of the menu item, were there a number of menu items left over, or was just the right amount prepared, and is participation increasing, decreasing, or remaining about the same)? Then the SFA must add each applicable school's planned production numbers together to get the total number of projected servings to be prepared for each menu item for the entire school district. These numbers are then used in the weighted nutrient analysis of the central menus.

If there is no previous data on menu item selections (for new menus/menu items), the SFA must use their best estimate for the amount that will be selected by students for each menu item for the nutrient analysis; when there is some history of student selections (i.e., after repeating the menu cycle 2-3 times), the SFA must aggregate the real data and use it in projecting the planned amounts for the nutrient analysis.

### **14. In a large SFA (over 200 schools) on nutrient-based menu planning, must the SFA aggregate production data from all schools that serve the same menu (portions and/or menu items) or may a sampling from each school age/grade grouping using the same menu be used for conducting the weighted nutrient analysis?**

No, a sampling may not be used. There is no way to guarantee that the sampling would reflect the choices of any particular age/grade group, and would thus not provide an accurate weighted analysis. The SFA will need to assess the time and effort required, in this case, to implement a weighted centralized menu, and decide if they can effectively implement this menu-planning approach.

### **15. Can an SFA using a nutrient-based menu planning approach aggregate their production numbers and then convert to percentages for the nutrient analysis?**

It is always more accurate to work with raw data. Because of the possibility of error in converting to percentages and difficulty in evaluation, USDA requires that raw data be used in the analysis.

## NUTRIENT ANALYSIS (Continued)

**16. If an SFA has a central kitchen serving ten schools and has an additional ten schools with on-site production kitchens, is an individual analysis required for each production site or one analysis for the SFA?**

The answer to this question depends on whether all 20 schools are serving the same menu and using the same food items/ingredients and the same preparation methods for the menu. If all 20 schools are serving the exact same menu and are all using the same foods and preparation methods, then one central menu could be planned and analyzed for each age/grade group for the SFA. However, if any individual schools modify or offer different menus than the analyzed central menu, a nutrient analysis for each of these school's menus must also be conducted.

**17. How many times during a school year should an SFA on a nutrient-based menu planning approach re-analyze their menus?**

The SFA must re-analyze menus if 1) menu items change; 2) new food products are purchased and/or brands of commercially-prepared products change; and 3) the student selection pattern changes (only applies if the SFA is conducting weighted nutrient analyses). At a minimum, SFAs using weighted analysis should aggregate planned production data at least twice per school year to determine if the numbers for the weighted analysis of student meals should change.

**18. Can an SFA using a nutrient-based menu planning approach customize breakfast nutrient standards for breakfast?**

Yes, but this should only be done when students can be served the appropriate serving size for the customized age groups. For example, schools that implement breakfast in the classroom may be able to vary serving sizes for the customized ages used for the nutrient analysis. Where children of all ages flood into the cafeteria at once for breakfast, it would be difficult, if not impossible, to identify children by age and provide the appropriate serving sizes.

**19. What does the SFA do when a Nutrition Facts Label is not available for a food item served?**

The SFA should contact the vendor or manufacturer to determine if the manufacturer can complete the sample Manufacturer's Data Submission Form located in the appendices of the *Nutrient Analysis Protocols* manual. If the product does not contain a Nutrition Facts Label and the manufacturer cannot or will not submit nutrient information for the product, the product should not be included in the SFA's school menus.

## NUTRIENT ANALYSIS (Continued)

- 20. When an SFA begins to use NSMP for the first time, develops new centralized menus, and conducts a district-wide nutrient analysis, should the menu be reanalyzed if the projected number of servings changes?**

Yes. If the SFA is planning centralized menus for all its schools, and the menu is one that is new so there is no selection history, the SFA must estimate the projected number of servings for the initial weighted analysis. The menu must be re-analyzed when there is data to indicate a history of student selection for each menu item (usually after repeating the cycle 2 or 3 times) and the SFA can use that data to determine the actual number of planned servings.

If the SFA plans central menus and analyzes menus using simple averaging, it is not necessary to re-analyze once there is history of student selections. Simple averaging

is not weighted according to student selection but gives equal weight to every item offered to the student within each menu choice grouping.

- 21. When a large school system (100 or more schools) uses NSMP, must they do nutrient analyses for each school when individual schools are allowed to add to or modify the planned menu? How do you deal with manager's choice days?**

If schools are allowed to add to, or modify, the planned central menu for manager's choice days or for any other reason except for necessary substitutions, nutrient analyses must be conducted for each age/grade group in each school within the SFA that uses a nutrient-based menu planning approach.

- 22. If a school is on NSMP and the school has frequent leftovers and the school's policy is to offer these leftovers the next day, should the menu be re-analyzed?**

If the school consistently has leftovers to add to each day's menus, the nutrient analysis that has been conducted is not valid, regardless of whether the analysis was conducted using weighted averaging or simple averaging, since the number of menu items changes each day. This is also a program issue. 7 CFR 210.10 (a)(2) states "schools need to consider participation trends in an effort to provide one reimbursable lunch and, if applicable, one reimbursable afterschool snack for each child every day." If it is clear that the school has a problem with production of excess menu items/meals (leftovers), that must be noted as a finding and corrective action required; the food production must be adjusted to reflect preparation based on one meal per child per day for the number of children expected to participate.

- 23. For an SMI review of an SFA on nutrient-based menu planning, nutrient analysis must represent menus planned. In a food court situation, the SFA offers a total of 20 side dishes but plans to have only 4 of the 20 sides at each serving line. The side dishes are dictated by the entrees offered on each serving**

## NUTRIENT ANALYSIS (Continued)

**line--students can only select from one serving line and can't shop around for sides. If the SFA, on NSMP, is utilizing simple averaging for the nutrient analysis, and does one analysis for the week, combining all the serving lines within the food court, does this analysis really represent menus planned? The State agency is proposing that if the SFA is using simple averaging for menus planned as described above, an analysis for each serving line be conducted and then all analyses averaged for the food court (give each line an equal weight) to get an analysis for the food court.**

This is the correct way to conduct a nutrient analysis using simple averaging where students cannot choose all items, but are limited to choosing items contained on individual serving lines.

### **STATE AGENCY – NUTRIENT ANALYSIS**

#### **24. When does a State agency have to aggregate data for a nutrient analysis?**

During an SMI review of a food-based school, the State agency does not have to aggregate data when they are conducting a nutrient analysis of a school's menus. Remember—the State agency does not conduct the analysis on the SFA as a whole, only the school they are reviewing.

When conducting the nutrient analysis of the school's menus, the State agency may use simple averaging or weighted averaging. If the State chooses to use simple averaging, they would conduct the nutrient analysis by assigning equal weight to each menu item within each group of menu choices. If the State chooses to conduct their nutrient analyses using weighted averaging, they will use the review school's production records to determine the actual number of menu items prepared for reimbursable meals.

#### **25. When conducting a nutrient analysis, does the State agency use planned menu data on both food- and nutrient-based analyses?**

The State agency does not perform nutrient analysis of menus of SFAs implementing NSMP/ANSMP; the State *validates* the nutrient analyses conducted of planned menus by SFAs implementing NSMP or the nutrient analyses conducted by other entities for ANSMP. Therefore, the nutrient analyses must be based on the number of servings planned for reimbursable student meals.

## NUTRIENT ANALYSIS (Continued)

If an SFA on food-based menu planning does its own nutrient analysis following the *Nutrient Analysis Protocols*, that nutrient analysis must also be based on the number of servings planned for reimbursable student meals. If the SFA wants the State to use the nutrient analysis for the SMI review, the State agency will validate the nutrient analysis.

For the State agency's nutrient analysis of SFAs using FBMP, the State agency uses the data from the review school's production records to conduct nutrient analyses of the review school's menu(s) based on the number of menu items prepared for service in reimbursable student meals as long as the number of menu items prepared are based on the service of one meal per child per day. Preparation of excess items must not be used for the analysis. If it is clear that the school has a problem with production of excess menu items/meals (leftovers), that must be noted and corrective action required, and food production adjusted to reflect preparation based on one meal per child per day for the number of children expected to participate.

**26. For a State's review of an SFA that uses two different menu planning methods for lunch and breakfast, does the review school have to have two nutrient analyses—one for each menu planning method?**

For the SMI review, each menu planning system must be reviewed. For example, if the SFA uses FBMP for lunch and NSMP for breakfast, the State reviewer would have to conduct a nutrient analysis of each age/grade group used for menu planning in the review school for lunch and would have to validate the SFA's nutrient analysis for each age/grade group used for menu planning for breakfast.

**27. When is the State agency required to conduct a nutrient analysis for a school's breakfast program?**

At a minimum, the State agency shall review at least one school for each type of menu planning approach used in the SFA. Therefore if the SFA uses a different menu planning approach for breakfast than for lunch, the reviewer is required to conduct an SMI review of breakfast as well as lunch, including conducting or validating the nutrient analysis.

If a school/SFA on NSMP/ANSMP *combines* the analysis for breakfast and lunch, the reviewer will also need to conduct an on-site review of the breakfast and lunch meal service to validate portion size, food preparation, etc.

**28. Since all nutrient analysis software programs have the ability to customize nutrient standards to specific ages or grades, why wouldn't State agencies be able to use the best information available, i.e., use customized nutrient standards for the nutrient analysis for reviewing schools on FBMP?**

## NUTRIENT ANALYSIS (Continued)

Because schools on a food-based menu planning approach use meal patterns for their menu planning, the State agency must use the nutrient standards that correspond to the meal patterns used at the review school. For example, customizing Grades 9-12 for a high school using the Traditional meal patterns would be unfair to the SFA since the lunch meal patterns are based on either Grades 4-12 or the optional Grades 7-12.

Using customized ages/grades for Grades 9-12 might indicate the SFA is failing to meet the nutrient targets, when in fact they would be meeting the nutrient targets for the allowable meal pattern.

**29. What is behind the logic of not allowing State agencies to combine breakfast and lunch analysis for schools operating on a food-based menu planning approach?**

The regulations pertaining to allowing the nutrient analyses to be combined for breakfast and lunch are under 7 CFR 210.10(i), *What are the requirements for lunches under the nutrient standard menu planning approach?* This provision does not apply to the food-based menu planning approaches. The logic is that by conducting a nutrient analysis separately for breakfast and/or lunch, it provides the State agency the opportunity to focus on area(s) in the school needing technical assistance and improvement.

**30. If a new SFA (i.e. charter, private) purchases their meals from an established SFA that has had a satisfactory SMI review, do the new SFA's menus have to be analyzed?**

Yes, and the State agency must conduct an SMI review of the new SFA. If the SMI reviews are conducted during the same school year and if both schools are offered the same menu, the State agency may elect to use the same review week for both the SFA's selected school and the charter school. If the SA reviewer determines that the meals, portion sizes, etc. are implemented the same way at the Charter school as the established SFA, the same nutrient analysis may be used. However, if weighted averages are used, the weighting of the menu items for the nutrient analysis of this new school will probably be quite different from the established SFA, and reanalysis of the menus would be required using the Charter schools planned meal/menu item numbers.

**31. When the school has their own recipe, for example meat sauce for spaghetti, can a recipe in the database be used if it contains the same major ingredients rather than reanalyzing the school's recipe. The school is on food-based menu planning.**

No. Even though the recipe may contain the same major ingredients, the proportions may differ. Unless the school prepares the USDA Quantity Recipe exactly as

## NUTRIENT ANALYSIS (Continued)

analyzed according to USDA's protocols (first listed ingredient, no optional ingredients), the recipe used by the school must be entered.

**32. When a State agency validates the nutrient analysis of an SFA that is on NSMP, does the reviewer have to look at every Nutrition Facts Label to make sure the schools data entry is correct?**

This is a judgment call for the reviewer. The reviewer should begin with a review of a sample of several labels. If an error is found, the review should be expanded to more Nutrition Labels to try to identify the category(s) of error to determine whether the problem is isolated or systemic. Remember that not every food product will require a Nutrition Facts Label. Food items that are "generic" and have an *exact match* in the database do not need data entry from the Nutrition Facts Labels.

**33. If the SFA is on a food-based menu planning approach and conducts its own nutrient analysis— must the State agency do an analysis or just validate what the SFA did?**

Schools on a food-based menu planning approach are not required to conduct a nutrient analysis. If the SFA/school conducts the nutrient analysis according to the USDA's Nutrient Analysis Protocols, including documentation of the date the need for a substitution(s) was known, and requests that the State agency use their analysis for an SMI review, the State agency would validate the nutrient analysis. If the SFA conducts the nutrient analysis but does not want the State agency to use their analysis for the SMI review (or does not follow the Nutrient Analysis Protocols), the State agency must conduct the analysis.

### **COMBINING BREAKFAST AND LUNCH**

**34. For an SFA/school using the NSMP approach that combines breakfast and lunch nutrient analysis, does the SFA/school use the lunch nutrient standards for comparison to the combined analysis?**

No, the school would not use a lunch nutrient standard for comparison to a combined breakfast and lunch analysis. The SFA or school that decides to combine the nutrient analysis of breakfast or lunch must:

- a) Project total student meals and the planned production numbers for menu items for both breakfast and lunch menus using history of past student selections in preparation for conducting weighted analysis.
- b) Use USDA-approved software that can combine and provide a weighted nutrient analysis of breakfast and lunch menus. All software will not do a combined nutrient analysis; it is an optional function. If the SFA/school wishes to combine breakfast and lunch analysis, they should select software that will perform function.

## NUTRIENT ANALYSIS (Continued)

- c) In software that has this capability, the software calculates a **combined nutrient standard** for breakfast and lunch. The nutrient analysis and the
- d) Combined nutrient standard are weighted based upon the projected participation for breakfast and lunch.
- e) Finally, the SFA/school, when conducting nutrient analysis, compares the combined analyses to the combined nutrient standard to evaluate if the nutrient standard is being met for the applicable age/grade groups and makes changes in the menus, if needed, so that menus meet the nutrition standards.

### 35. When an SFA/school using the NSMP approach combines the breakfast and lunch analysis, which grade groups do they use? Do they use the breakfast grade groups or the lunch grade groups?

The SFA/school uses the age/grade grouping that is being used for menu planning for each type meal. SFAs/schools are reminded that at **least two age/grade groupings must be used for NSMP for lunch**. For example, if an SFA/school uses two grade groups for lunch menus (K-6 and 7-12), and one grade group for breakfast menus (K-12), they would have two combined analyses to conduct. The SFA must be able to separate the planned meals/menu items for breakfast into the 2 grade groups for lunch, i.e. the number of planned breakfasts/menu items for students in grades K-6 and the number of planned breakfasts/menu items for students in grades 7-12. The two combined analyses would be as follows:

- Combined analyses for K-6 lunch and K-12 breakfast (using the number of planned breakfasts and planned lunches for K-6 grade groups)
- Combined analyses for 7-12 lunch and K-12 breakfast (using the number of planned breakfasts and planned lunches for 7-12 grade groups)

In a combined analysis, SFAs/schools must *only* include the planned number of breakfasts for those age/grade groups that *correspond* to the lunch age/grade groups, i.e. **the combined nutrient analysis must compare exact grades of breakfast and lunch**. If not, breakfast data will be weighted too heavily. In the example described above, the SFA/school would use the following procedure in combining the analysis:

The SFA/school has 400 students that participate in the SBP; 250 of these are in grades K-6 and 150 are in grades 7-12.

The SFA/school has 750 students that participate in the NSLP; 400 of these are in grades K-6 and 250 are in grades 7-12.

- When entering the number of reimbursable meals (participants) for the combined analyses for K-6 lunch and K-12 breakfast, the SFA/school would project 250 meals for the SBP and 400 meals for the NSLP.



## NUTRIENT ANALYSIS (Continued)

- When entering the number of reimbursable meals (participants) for the combined analyses for 7-12 lunch and K-12 breakfast, the SFA/school would project 150 meals for the SBP and 250 meals for the NSLP.

**36. If an SFA that is using a nutrient-based menu planning approach conducts a combined analysis of breakfast and lunch, must the State agency review breakfast and lunch or just review lunch?**

State agencies are required to validate the nutrient analysis(es). If the SFA has combined the analysis for breakfast and lunch in order to meet the nutrient targets, the State agency will need to validate the combined analysis, including determining if the number of projected meals for each meal service was determined and entered correctly, if the recipes were entered correctly, if the correct food items were selected, etc. This would require the State agency to review both meals.

**37. If breakfast and lunch are combined for analysis for a school on NSMP, are they always required to combine them for analysis? (As opposed to combining them only when it benefits the analysis.)**

Schools on a nutrient-based menu planning approach are allowed to combine the nutrient analysis for breakfast and lunch. Technically, as long as they are consistent within a school week, the school could combine one week and conduct separate analyses for the next week. This would require the SFA/school to manipulate the software back and forth to achieve this vacillation and to document from week to week which approach was used. FNS does not recommend this procedure. Disadvantages are 1) possible increase in error from changing procedure, 2) tracking procedure from week to week, and 3) inability to identify which meal falls short in nutrients—breakfast or lunch.

### **THEME BARS**

**38. How do you create a recipe for an “entrée” salad bar where only a few items, such as macaroni/potato salads are limited to ½ cup, and if amounts in excess of ½ cup are taken, students are charged a la carte prices for those items. The students can take as much of the other vegetables as they want.**

To create an “entrée” salad recipe, follow the directions for analyzing a salad bar recipe listed in the *Nutrient Analysis Protocols* manual. A minimum serving size must be established for the salad bar for Offer vs. Serve (OVS); students must take at least the minimum serving size for the menu item to count for OVS.

To include food items with a predetermined portion in the recipe: 1) Calculate the total amount of these food items prepared for the salad bar, 2) Total up the amount of

## NUTRIENT ANALYSIS (Continued)

food portions left over, 3) Subtract the leftover amount from the amount of food placed on the salad bar, 4) Subtract any a la carte sales of these items from this amount. 5) Use this final total in the recipe for the salad bar. The number of reimbursable salad entrées for the nutrient analysis would be the estimated number of students that would be expected to select the “entrée” salad.

**39. A school on NSMP offers a food bar with multiple items as side dishes. How do you enter these items in the nutrient analysis? A recipe?**

Yes, it would be considered a theme bar and a recipe would be prepared if students may choose any or all of the food items. If a minimum serving size from combined selections from the food bar has been established, the menu planner can document the amount of food selected when these exact menu items are offered again on the food bar. When any menu item changes, a new recipe will need to be developed because (1) different menu items provide different nutrients and (2) the number of selections may change, influencing the weighting.

### NUTRIENT ANALYSIS – GENERAL

**40. If the review week consists of only four days and the nutrient analysis of the menus shows that the school does not meet the nutrient standards, can the next week consisting of only three days be combined with the review week?**

No, the week chosen for the review has four days and meets the requirement for conducting a nutrient analysis. The State agency would, therefore, use the chosen review week for the nutrient analysis; it would not be combined with the subsequent review week.

**41. Can menu planners, or the State agency, choose to analyze menus by occasionally grouping Monday, Tuesday, Wednesday Thursday of one week and then Friday with Monday, Tuesday, Wednesday, Thursday, and Friday of the next week in order to meet the nutrient standards?**

No. Nutrient analysis is based on a normal school week. A minimum number of school days in a week that may be analyzed are three, and the maximum is seven. All must be consecutive days.

**42. One of the suggestions in the *SMI Road to Success* is to cook and chill a food item such as soup, and then skim off the fat. How is this to be reflected in conducting the nutrient analysis?**

This is why it's extremely important to select the correct food item or ingredient from the software database when conducting nutrient analysis. In this case the menu planner would select the “cooked” version of the meat used in making the soup, since

## NUTRIENT ANALYSIS (Continued)

the meat would be the source of fat. The cooked version reflects the nutrients in the meat minus the fat lost in cooking or skimmed off the top. If the meat is not cooked prior to adding to the soup but is added raw to the soup, and not chilled and skimmed off, then the menu planner would select the “raw” form of the meat used in the soup. This selection would reflect the fat that will remain in the soup recipe.

### **43. Can the SFA use the nutrient information available in the Child Nutrition Database rather than Nutrition Facts Labels or data forms submitted by manufacturers?**

The menu planner’s first choice should be to identify generic food items that are already in the Child Nutrition (CN) Database. These standard reference foods, such as mayonnaise, canned green beans, frozen corn, fresh fruit, and eggs, do not need to be added. In fact, it’s recommended not to add nutrient information for specific brands of generic foods as the brands may change as the bid cycle awards new brands. The menu planner must input nutrient information on new or commercially-prepared items that are not included in the database.

### **44. Please review when to record “0” for missing nutrient data. Can menu planners and State agency reviewers ignore missing data? If yes, for what nutrient? Water? Ash?**

It is important to enter the nutrient data for any nutrient defined in the nutrition standards for school meals—calories, protein, carbohydrate, vitamin A, vitamin C, calcium, iron, dietary fiber, cholesterol, sodium, fat, and saturated fat. While the amount of water and ash may assist the menu planner or reviewer in determining the total weight of a recipe for checking serving size or for errors, menu planners and/or reviewers are not required to search for this data if it is not available.

If the Nutrition Facts Label or the manufacturer’s nutrient data statement indicates there is an insignificant amount of a nutrient, enter zero “0” for the nutrient value. Do not enter zero “0” for missing nutrient information. The SFA/State agency must obtain data for any nutrient identified in the nutrient standards. A nutrient analysis with missing data is unacceptable.

### **45. Is there a web site or other avenue for the State agency to obtain nutrient data for foods that have been given a CN label?**

A CN label statement only identifies the quantity(s) of creditable food items of a commercially-prepared food toward meeting meal pattern requirements. The CN label does not provide nutrition information related to the product, so it cannot be used for nutrient analysis purposes.

## NUTRIENT ANALYSIS (Continued)

- 46. What value should I use when entering the base weight of a food item into our nutrient analysis software? 100 grams or the serving size stated on the food label?**

When entering a new food item into the software, you will need to provide information about the nutrients in the food item. For most items, this information will be on the Nutrition Facts Label and based on the serving size stated on that label. In this case, the weight of the serving is the base weight (the weight upon which the nutrient values are based). However, you may have a fact sheet from a food manufacturer with the nutrients stated per 100 grams of the product and a statement that the serving size equals, for example, 1 cup (240 grams). In this case, the base weight is 100 grams and the nutrients are entered for the 100 gram weight. You would also have to add the measure and weight of the serving size (1 cup and 240 grams).

- 47. If a school program operates only on Saturdays, such as a migrant education program, how should the nutrient analysis be completed to meet the minimum of “3 days” of analysis requirement? Use three consecutive Saturdays?**

If this is a school program, operating a regular school week, with the migrant education program being held on Saturdays, then Saturday would be combined with the previous school week, and six days of menus would be analyzed. If the school (program) operates *only on Saturdays*, the reviewer can conduct a nutrient analysis of three to seven Saturdays' menus to have an average analysis.

### **OTHER**

- 48. What roles do vending machines and concession stands have on nutrient analysis when not utilized during hours of meal service?**

Foods offered a la carte and in vending machines or concession stands are not included in the nutrient analysis. Only foods and beverages served as part of reimbursable meals are included in the analysis.

- 49. A vendor that contracts with an SFA for supplying meals provides their own Nutrition Facts Labels on the pre-packaged meals, i.e., they do not indicate the brands of products nor provide individual Nutrition Facts Labels for each product used in the meal. Is this acceptable?**

It is acceptable. If a manufacturer uses the Nutrition Facts Label panel format, they are subject to the requirements for nutrition labeling according to regulations issued in January 1993 by the Food and Drug Administration (FDA) and the U.S. Department of Agriculture's Food Safety and Inspection Service (FSIS). FDA's regulations meet the provisions of the Nutrition Labeling and Education Act of 1990

## NUTRIENT ANALYSIS (Continued)

(NLEA), which, among other things, requires FDA to make nutrition labeling mandatory for almost all processed foods. FSIS regulations, which cover meat and poultry products, largely parallel FDA's.

This nutrient information is self-reported, similar to the nutrient information provided on a manufacturer's nutrient data sheet. If a food vendor is using the format of the Nutrition Facts Label, they fall under the same requirements as a manufacturer. If you believe the information on a Nutrition Facts Label to be incorrect, you should notify FDA or FSIS.

### **50. How do you analyze self-serve items when there is not a portion size?**

If the item, for example, is a condiment that is not pre-portioned, the menu planner or State reviewer will need to determine the average portion size selected by the students. To calculate the average portion selected, divide the total amount of a food item served on the menu (#10 cans of catsup, gallons of mayonnaise, etc.) by the number of applicable meals served that day. Under- or over-estimating the size of a self-serve portion can greatly affect the nutrient analysis.

### **51. Is a second nutrient analysis required to verify corrective action?**

This would be a judgment call for the State agency. If the State agency feels comfortable with other documentation of the corrective action, it would not be necessary for a second nutrient analysis. On the other hand, if during the State agency's validation of the nutrient analysis of an SFA using nutrient-based menu planning, the reviewer identifies frequent errors that could not be corrected without a new nutrient analysis, the State agency has every right to require a new nutrient analysis.

### **52. How are menu items selected by adults treated for nutrient analysis? "Backing out" the number of menu items and/or amount of foods selected by adults is next to impossible. Is including in weighting the number of menu items selected by adults a correct procedure?**

If the menu items selected by the adults are part of a complete meal and the software only records the number of adult meals, the SFA should estimate and subtract the number of menu items selected by adults from the number of menu items planned for reimbursable meals.

If the menu items are purchased a la carte, it does not matter if they were purchased by adults or students. They are separated out as a la carte sales.

## NUTRITION STANDARDS

- 1. When will the SMI nutrition standards be updated to reflect the current Dietary Recommended Intakes (DRIs) and the 2005 Dietary Guidelines for Americans? In view of current scientific research, does USDA plan to set carbohydrate standards, limit sugar and sodium, and prohibit trans-fats?**

USDA is in the process of reviewing and comparing the current nutrition standards and meal pattern requirements of the National School Lunch Program and School Breakfast Program to the recommendations of the 2005 Dietary Guidelines for Americans and the Institute of Medicine's Dietary Reference Intakes. If changes are warranted, the Department will publish a proposed regulation for public comment.

- 2. If a State agency establishes nutrient standards for sodium, cholesterol, and/or fiber, which are currently not quantified in 7 CFR 210 and 220, can the State agency require corrective action (including fiscal action) from the SFA?**

In this area, the State agency may establish requirements that go beyond the Federal requirements. This includes establishing standards for certain nutrients and requiring corrective action when their nutrient standards are not met. The State may also take fiscal action for noncompliance with the State requirements if corrective action does not occur.

- 3. Can a State agency set a reasonable upper limit on calories above the minimum requirements?**

While State agencies can go beyond Federal regulations in this area, FNS does not recommend setting a maximum amount for calories in the nutrient analysis for the following reasons:

- Many students do not get the full amount of planned calories because of Offer versus Serve, and the fact that students frequently do not consume all foods they select.
- The nutrient standard for energy is the minimum amount and is an *average amount* for the age/grade groups and genders. For many growing students, their need is greater than the average.

- 4. Should planned menus meet the energy requirements on a daily basis?**

FNS highly recommends that menus meet the daily energy requirements for specific age/grade groups. Providing consistent calories daily helps ensure that children are not underfed on some days and overfed on other days. Children may experience hunger on the days that the meals are insufficient in calories.

## OFFER VERSUS SERVE

- 1. For a school using a nutrient-based menu planning approach, please explain again the Offer vs. Serve 2 and 2 rule. Must one menu item taken be the complete entrée?**

This rule is helpful for cashiers and students to remember how many items the student must take under Offer vs. Serve when the SFA/school is using NSMP/ANSMP. The student must always take at least two menu items (depends on how many menu items are offered) and can never decline more than two menu items (if four or more menu items are offered). And the student must always take the complete entrée. Examples are:

<b># of Menu Items Planned to Meet the Nutrient Standards</b>	<b># of Menu Items Student Must Take</b>	<b># of Menu Items Students May Decline</b>
3 menu items (entrée, 1 side dish, and fluid milk)	2 menu items (entrée plus 1 side dish or milk)	1 menu item (side dish or milk)
4 menu items (entrée, 2 side dishes, and fluid milk)	2 menu items (entrée plus 1 side dish or milk)	2 menu items (any combination from side dishes and milk)
5 menu items (entrée, 3 side dishes, and fluid milk)	3 menu items (entrée plus combination of side dishes and milk)	2 menu items (any combination from side dishes and milk)
6 menu items (entrée, 4 side dishes, and fluid milk)	4 menu items (entrée plus combination of side dishes and milk)	2 menu items (any combination from side dishes and milk)

- 2. When using Offer vs. Serve, schools produce more menu items than the total meals planned. Is this okay?**

This may be occurring for two reasons: 1) the school is offering menu choices for reimbursable meals and may be forecasting an additional number of servings in order to avoid running short of a menu item, and 2) a number of the menu items are also being prepared for a la carte sales.

For reason #1), a small amount of over-production for menu items that must be prepared in advance, such as meat sauce for spaghetti, is expected. If the over-production is excessive, the SFA should provide training on forecasting and on how to batch or stagger cooking during meal service so as to not overproduce or run short while ensuring the quality of the menu item.

## OFFER VERSUS SERVE (Continued)

For reason #2), schools should have procedure(s) to separate the number of menu items prepared for a la carte sales from the number of menu items prepared for reimbursable meals on the daily food production record.

- 2. For a school on NSMP, how is a side item self-serve bar counted according to OVS when students can choose all items on the bar? For example: 3 entrée selections are offered (students can choose 1); the salad bar offers 8 items (students can choose all), and a variety of milk is offered (students can choose 1). Is this considered a 3 item planned menu?**

Yes, this menu is considered a 3-menu item planned menu with the following requirements. The entrée is one menu item. The menu planner must designate a minimum planned portion size for the salad bar, and the cashier must ensure that students take at least this minimum planned portion size for the salad bar to count as a menu item on the menu. Milk is the third menu item.

- 3. When planning the menu structure that includes side dish groupings, what are the correct terms to let students know how many choices they can have within one side dish group? Can “Choose 1 or more” from a side dish grouping be used?**

The correct term to be used is specific to the amount a student can choose. For example, use “Choose 1” or “Choose 2”. The menu planner can then project the planned serving within each side dish grouping to be used in the nutrient analysis. If the terms “Choose 1 or more”, “Choose 2 or more”, and so on are used, it is not possible to project the number of servings using simple averaging because of the possible variations within the groupings. The SFA/school that allows students to choose 2 “or more” must do weighted averaging.

- 4. A school with Grades 9-12 is operating under a food-based menu planning approach. Several different lines are available on a daily basis. Entrees are pre-portioned but all other food components have serving utensils available. If a student wants two servings of mashed potatoes, they are not charged a la carte. It is counted reimbursable as long as two different food components are taken. Is this okay?**

No. It is a reimbursable meal *only* if the student was offered the required number of food items (M/MA, two different fruits and vegetables, G/B, and milk), and the student selected at least three menu items in the planned portions. Two servings of the same food item cannot be counted as two food items. Schools that prepare enough of a food item so that students can take two servings of any item may be over-producing and students should be charged accordingly.



## PORTION SIZES

### 1. How are the defined portion sizes for entrees and side dishes enforced on the salad bar?

The following suggestions will help ensure that students take the planned portion sizes of menu items on a salad bar:

- Use portioning utensils on self-serve food bars.
- Train students to take the planned portions, e.g. have examples of correct portion sizes on serving line.
- Pre-portion menu items prior to placing on the serving line.

Finally, the cashier must be trained to judge accurately the quantities of self-serve items on student trays to determine if the food/menu item can count toward a reimbursable meal.

### 2. Can a State agency require a minimum serving size of ¼ cup for vegetables and fruit in the food-based menu planning approaches, Traditional and Enhanced?

State agencies can **never** require less than Federal regulations; however, they can impose stricter requirements in this area. In the food-based menu planning approaches, the meal patterns in the Offer versus Serve modules\* require that the minimum serving size is 1/8 cup, which can count toward the required total servings of vegetables and fruits. The State can require that the minimum serving size of vegetable and fruits be ¼ cup.

\* Information on the Offer versus Serve modules can be found on the Team Nutrition website: [www.teamnutrition.usda.gov](http://www.teamnutrition.usda.gov) .

## RESIDENTIAL CHILD CARE INSTITUTIONS (RCCI)

### 1. **What is the definition of a school week for nutrient analyses for RCCIs since they can operate from one to seven days a week?**

RCCIs are often quite different from regular schools. They may be the sole dietary provider for residents on a daily basis. Therefore, the total number of days during the week that the RCCI serves breakfast and lunch to residents becomes the “school week.” If these meals are served each day of the week (including Saturday and Sunday), then the “school week” is seven days. The nutrient analysis is conducted on seven days.

Should the RCCI serve breakfast and lunch only on weekends, this would not apply. The analysis must be conducted on more than one week to get a minimum of three days. In this case, the nutrient analysis must be conducted on more than one weekend of menus to get a representation of what the children are consuming.

### 2. **Are production records and standardized recipes required in RCCIs using food-based menu planning? Some RCCIs are structured as cabins with 5-6 clients, with family style service. Children are encouraged to prepare their own meals.**

RCCIs must show that meals meet appropriate meal requirements. In most cases, RCCIs should have production records and standardized recipes to document meal accountability and conduct a valid nutrient analysis. For meals to be reimbursable, there must be some form of documented menu records to show planned menu items, projected serving sizes for planned meals, a record of the amount of food produced, and actual menus and number of meals served. These records would then be used to conduct the nutrient analysis. Recipes for planned menus should be available and used to make sure that quality and nutritious meals are served and quantity is sufficient for reimbursable meals.

For meals to be reimbursable, RCCI administration must provide necessary guidance to children who prepare their own meals to ensure that the planned menus (menu items and portion sizes) are followed. In addition, children should be adequately supervised in preparing and serving meals because of safety and sanitation issues.

### 3. **Should RCCIs have an SMI review if they are only providing tube feedings and/or special blended diets for special needs students?**

No, meals in which substitutions are made for students with special dietary needs are not required to meet SMI nutrition standards. However, if the only change to a regular menu is a modification in texture, these meals must be included in a nutrient analysis to determine compliance with SMI requirements.

## RESIDENTIAL CHILD CARE INSTITUTIONS (RCCI) (Continued)

- 4. Would it be possible to use a validated food frequency questionnaire to analyze RCCIs instead of conducting a full SMI?**

This is not allowable under Federal regulations, which require that a valid nutrient analysis be conducted. Even if the RCCI is on food-based menu planning, there still must be documented menu records to show planned menus that meet appropriate meal requirements.

- 5. A certain foodservice management company provides meals for a lot of Juvenile Detention Centers. They use a nutrient analysis for their menus for Breakfast, Lunch, Dinner and afterschool snacks. Does the State agency conduct a nutrient analysis for seven days of lunch and compare against the SMI nutrient standards or just validate their analyses for all meals provided to incarcerated children?**

We are assuming from your comments that the SFA is on food-based menu planning and wants the State to accept their nutrient analysis. The nutrient analysis procedure described in the question is not acceptable for State agency validation. The menu planner must be using USDA-approved software to conduct the analysis; USDA-approved software does not allow the analysis of dinner and afterschool snacks. If the facility serves meals to students every day of the week, the State agency would need to conduct a nutrient analysis of seven days of lunch, at a minimum. They could also analyze breakfast menus.

The menus must be planned for the appropriate age/grade group(s) being served and USDA *Nutrient Analysis Protocols* must be followed. The State agency (SA) must use the appropriate nutrient standards to evaluate the student meals.

Remember that breakfast and lunch cannot be combined under either Traditional or Enhanced menu planning approaches.

- 6. In an RCCI with moms (20 years of age and under), infants, toddlers, and preschoolers through 6<sup>th</sup> grade, should the State agency do an SMI review for each age/grade group? How do we do an SMI review for pregnant and lactating moms between the ages of 14 through 20 years of age in an RCCI program?**

Pregnant and lactating women would be considered as having special dietary needs and would be exempt from the SMI review. The NSLP and SBP regulations require that children 2 years and older be served meals that meet the SMI nutrition standards unless they are exempt because of special dietary needs also. The only meals to be included in the nutrient analysis are meals served to children 2 years old and above, excluding moms, and infants.

## RECORD KEEPING/REPORTING

- 1. Menus, production records, etc. must be retained for three years plus the current year for NSMP schools. Can all be retained in computer files, or must they be printed? Recipes are often entered one year and modified from year to year. Should they be duplicating and dating recipes or can they “cover” 2001’s recipe in 2003 without worrying about it?**

This depends on the sophistication of your electronic system. If your electronic system can make a complete record of food items, recipes, menus, and production records (must be able, for example, to record all data, including substitutions, school closures, etc.) and if your system can file and retrieve by date, then your electronic record would be sufficient documentation. However, some electronic systems do not have the capability of saving historical data and will only save the latest records. If your system cannot save historical data by date, you will have to print the nutrient analysis information and maintain the paper source documentation on file.

- 2. Schools and State agencies are only required to retain required records for three full years plus the current year. Are you suggesting that SMI records are to be available by schools and State agencies indefinitely in order to compare results?**

As discussed in the 2004 SMI training, FNS recommends that State agencies retain the SMI records, including the nutrient analysis, the corrective action plans, and follow up, from the last review until that school food authority’s next SMI review. This is not a requirement but would assist State agencies with their review and would help determine the school food authority’s progress in serving more healthful meals. State agencies may retain SMI review files electronically and, therefore, would not need to retain all of the paper back-up material.

## REIMBURSABLE MEALS

- 1. In a school operating under NSMP during a CRE review, the planned menu meets the minimum number of food items (entrée, one side, and milk). The SFA has no record of nutritionally analyzing the menu and/or menu for the week of review. Are meals to be reclaimed under CRE? If so, which meals?**

This is a very serious, systemic problem, since the basis for planning reimbursable meals under NSMP is an accurate nutrient analysis of menus planned to meet the nutrient standards. Those menus must have at least a basic structure of entrée, one side, and fluid milk, but may need to have additional menu items and/or condiments added in order to meet the nutrient standards.

If this menu-planning approach is new to the SFA for this SMI cycle, the reviewer should require *immediate* corrective action, with the SFA required to conduct the nutrient analysis for all age/grade groups used for all of the menu cycles, by a specific date, e.g., within the next two weeks. In the meantime, the SA can require the SFA to revert to a food-based menu planning approach.

If this is the second SMI review cycle for this SFA and they had similar problems previously, the SA is obliged to reclaim the meals since the SFA is not demonstrating a good faith effort.

- 2. During the 2004 training, FNS stated that when two tacos are the planned entrée under a nutrient-based menu planning approach, and a student takes only one taco, this is not a reimbursable meal. If we also are doing a CRE, do we now assess a claim due to this quantity shortage? Previously this would have been quantity only but still considered reimbursable.**

In NSMP, students are required to select the planned entrée. If the planned entrée is two tacos and a student leaves the line with only one taco, this is not a reimbursable meal.

- 3. Can you bundle sides such as (choose 1) Royal brownie with banana half OR raisin cup with breadsticks?**

Yes, you can bundle sides for NSMP and ANSMP. However, such bundling limits student choices and may affect student acceptability of meals; it also can affect meal cost because students will be forced to take food they may not want. SFAs should assess the impact of bundling on student acceptability of school meals and meal cost before implementing.

## REIMBURSABLE MEALS (Continued)

**4. When a CRE is conducted separately of a school on NSMP/ANSMP, what exactly is required in terms of evaluating a “reimbursable meal”?**

At a minimum, the State agency must:

- determine that a complete nutrient analysis was conducted on the planned menus for the period of the CRE review;
- determine the number of items that the menu planner considered a reimbursable meal;
- assure that the planned reimbursable meal was offered to the students; and
- ensure that each student took an entrée and at least the minimum number of side dishes.

As noted during training, SAs are encouraged to conduct the SMI review of an SFA on NSMP/ANSMP prior to the CRE review. This procedure would ensure that the SFA is implementing the menu planning system correctly and that reimbursable meals are being offered to students.

**5. What is the intent of the following statement for the nutrient-based menu planning approaches: “The analysis becomes the basis for determining reimbursable meals?”**

The meal patterns for the NSLP and SBP provide templates for reimbursable meals because they are designed to provide necessary calories and nutrients for children of various age and grade groups using the food items/components and the minimum quantities. There are no templates for reimbursable meals planned under NSMP. Reimbursable meals can be determined *only* through a nutrient analysis that indicates that the planned menus meet the minimum number of calories, nutrients and other standards when averaged over the school week. In addition, reimbursable meals must meet the required meal structure (for example, an entrée, one or more side dishes and milk for lunch).

**6. A school on a food-based menu planning approach conducts its own analysis, but the menus do not meet the nutrition requirements. Are its meals reimbursable?**

Normally the answer would be “Yes, as long as the meal patterns are met.” If this is a recent occurrence, the SA would determine that the meals are reimbursable and would require corrective action. However, if this is a long-standing problem and the SFA has made no effort to correct the noncompliance with the nutrition standards, the State agency should require immediate corrective action and give the SFA a short time frame for compliance. Then if the meals are not brought into compliance with the nutrition standards, the SA may determine that the SFA is not acting in good faith and fiscal action may be warranted.

## **REIMBURSABLE MEALS (Continued)**

- 7. In a school on NSMP, there is a food bar or salad bar, counted as one menu item where students can take all they want. Shouldn't there be a reasonable minimum portion size required?**

The menu planner must establish a reasonable minimum serving size and convey this information to the students and to the cashiers.

## SMI REVIEW FORMS

### 1. Are all of the SMI review forms optional or mandatory for State agencies?

While the forms are not mandatory, the State agency is responsible for conducting a complete and accurate SMI review. The forms are provided as tools to assist States in collecting the information necessary to conduct the SMI review.

### 2. Does SMI Form 14 replace the Improvement Plan?

Yes. One of the changes is the name of the form – *Corrective Action Plan for School Meals*.

### 3. Is there a form that combines the nutrient standards for breakfast and lunch?

No. A single form that combines nutrient standards for breakfast and lunch is not possible. SFAs/schools on NSMP/ANSMP and using weighted averaging may combine the nutrient analysis for breakfast and lunch; however, breakfast and lunch are also weighted by using the SFAs/school's participation for each of these meals. Therefore, each SFA/school will have unique participation and nutrient standards.

SFAs/schools that want to choose this option must determine if their computer software is capable of performing this function.

### 4. The SMI-12 (a) and 12 (b), Food Safety forms—are State agencies required to develop their own form and use it if they don't use the USDA prototypes?

Federal law now requires that SFAs develop and implement a HACCP-Based Food Safety Plan for each of their schools, and each school must have two School Food Safety Inspections per year. Therefore, State agencies must ensure that SFAs/schools are meeting these requirements. The State agencies may use these optional forms to capture this information or develop another method to determine that schools are compliant with Federal law.

### 5. For the SMI-1, Sample Notification Letter, could USDA provide a prototype letter for a CRE/SMI combo review?

While FNS has no plans to create a combination CRE/SMI contact letter, the State agency may design one that suits its needs. FNS recommends that the prototype letters be used to inform the SFA about pending reviews; however, both letters are optional.



## **SMI REVIEW PROCEDURES AND REQUIREMENTS**

- 1. It was stated during the training that the State agency is encouraged to conduct one SMI review for each menu planning approach. Is it encouraged or required?**

The State agency *must* conduct one SMI review for each menu planning approach that the SFA uses (7 CFR 210.19 (a)(1)(B)). If the menu planning approach used at breakfast is different from lunch, the State agency must review breakfast during the SMI review.

- 2. When is an SMI review closed? When corrective action is completed or when the nutrition standards are met?**

The State agency can close the review when the SFA has satisfactorily completed the required corrective action plan activities, and the State agency has verified their completion. The required corrective action plan should have specified actions that would bring menus into compliance with the nutrition standards.

- 3. Must the State agency close an SMI review within the 5-year cycle if the SFA has not completed improvement actions on corrective action plan?**

There are special situations where the State agency may not be able to close some reviews during the 5-year cycle. This may happen particularly for reviews conducted during the last year of the cycle. Examples are when an SFA is working on a corrective action that takes a lengthy time to complete or the SFA has to renegotiate the corrective action plan because of changing circumstances. Both of these situations could overlap into the next 5-year cycle.

- 4. During the training, it was stated that State agencies are expected to complete all SMI reviews, including follow-up activities, by the end of each SMI cycle. If a SA has not completed all follow-up work, are they not meeting review cycle requirements?**

FNS highly recommends that the State agency make every effort to schedule all SMI reviews during the first four years of the five-year cycle. The fifth year could be used to complete any follow-up work needed to close all reviews during the current cycle. However, FNS recognizes that sometimes this is not possible. This means that some unclosed reviews from the previous SMI cycle may extend into the subsequent cycle.

- 5. SFAs need to meet nutrient standards regardless of the type of menu planning approach being used. Why are SFAs using nutrient-based menu planning allowed to customize nutrient standards for age/grade groupings but food-based schools are not allowed to do this customization?**

## **SMI REVIEW PROCEDURES AND REQUIREMENTS (Continued)**

Defined meal patterns for specific age/grade groups are the menu templates for the food-based menu planning approaches. The meal patterns require specific kinds of foods in specific minimum quantities. The SFAs must use these established meal patterns to plan reimbursable meals, which means there can be no customization of the age/grade groups within the meal patterns.

Because there are no meal pattern requirements for nutrient-based menu planning approaches, SFAs implementing this approach must use nutrient analysis to plan reimbursable meals that meet the required nutrition standards. This allows menus/nutrient standards to be customized according to various age/grade groups.

**6. When the school is having an SMI review for the first time, can the State agency allow the SFA to determine the menu week and school to be reviewed?**

Federal regulations require that all SFAs must have an SMI review every five years. State agencies are responsible for developing and implementing five year SMI review schedules that meet this requirement. State agencies should establish criteria, develop their schedules according to the established criteria and must ensure they review all SFAs during the cycle. While it may be helpful for the State agency to work with an SFA that prefers an alternate review week and/or another school, the State agency must make those decisions on a case-by-case basis for justifiable reasons, ensuring that the review week and the school selected result in an unbiased review of each SFA's compliance with the SMI nutrition requirements.

**7. A State agency conducts a joint SMI/CRE review of an SFA using NSMP/ANSMP, and the SFA is not meeting nutrition standards.**

**a. Can the reviewer “switch” the SFA to a food-based menu planning approach to identify possible reimbursable meals? Should the reviewer automatically do this?**

Under the NSMP/ANSMP approaches, menus must have been correctly analyzed and planned using USDA-approved nutrient analysis software. The menu must meet the nutrition standards, and meals must contain, at a minimum, the required meal structures: Breakfast— at least 3 menu items, one of which must be fluid milk; and Lunch—at least 3 menu items, one of the menu items must be an entrée, and another must be fluid milk served as a beverage. These are minimums—both meals may require additional menu items to meet the nutrition standards. Without determining if the nutrient analysis was conducted correctly, the reviewer cannot determine what constitutes a reimbursable meal, that is, what menu items are required to be offered on the day of the review and how many menu items must be taken for a meal to be reimbursable.

## **SMI REVIEW PROCEDURES AND REQUIREMENTS (Continued)**

The reviewer cannot “switch” an SFA to food-based menu during a review to identify possible reimbursable meals. This is why scheduling the SMI prior to or at the same time as the CRE has been suggested. This allows the reviewer to determine what constitutes a reimbursable meal for each day of the review week.

The decision to require that an SFA change from NSMP/ANSMP to a food-based approach depends on the SFA’s demonstration of the ability to conduct a valid nutrient analysis within a reasonable amount of time. If the reviewer determines that SFA does not have the capability or resources to conduct a valid nutrient analysis within a short time frame and/or if the SFA has not shown “good faith effort” in implementing corrective action from previous SMI reviews, the SA may take fiscal action and/or require the SFA to switch immediately to a food-based approach.

### **b. Does the answer change if the SMI and CRE are conducted separately?**

If the State agency conducts the SMI and CRE separately, it is recommended that the SMI be conducted prior to the CRE. This will allow the SFA the opportunity to correct any findings with the nutrient analysis and menus and the SA to determine the number of menu items for a reimbursable meal during the CRE review. If the State agency determines during the CRE review that the SFA has not completed the SMI corrective action and the meals are not reimbursable, the State agency should take fiscal action and require the SFA to change to a food-based menu planning approach.

### **c. When conducting a CRE and/or SMI, is fiscal action required if meals are not reimbursable when a SFA is using any of the menu planning approaches?**

For CRE reviews, there are specific criteria for fiscal action. If meals are not reimbursable, they are disallowed. Refer to the answer in 7.a above for the discussion pertaining to determining when an SFA on NSMP/ANSMP does not have reimbursable meals.

With SMI, fiscal action can result when SFAs are not working in good faith to plan and serve meals that meet the SMI nutrition requirements. The decision to take fiscal action is a judgmental decision that must be considered by the State when they have determined that an SFA/school is not making a good faith effort to meet SMI program requirements. The type/amount of the fiscal action is based on the severity and longevity of the areas of noncompliance.

If the SA finds, during an SMI Review, that an SFA is not planning reimbursable meals, the SFA will be given the opportunity to correct the problem within a

## **SMI REVIEW PROCEDURES AND REQUIREMENTS (Continued)**

short time frame. The SFA may take corrective action by 1) making necessary changes within their current menu planning system to meet all requirements for planning/offering/serving reimbursable meals, or 2) changing menu planning systems to one they can implement correctly.

### **8. What happened to the term “NuMenus?”**

Federal regulations refer to the nutrient-based menu planning approaches as Nutrient Standard Menu Planning (NSMP) and Assisted Nutrient Standard Menu Planning (ANSMP). We use these terms to be consistent with Federal regulations.

### **9. Please explain the value of comparing the review of the last cycle and how it will be incorporated into the current review if different schools are reviewed.**

The State agency selects a school to be a representative sample of the SFA during an SMI review. In addition, the State agency should review a different school from the one reviewed in the previous cycle. Reviewing different schools gives the State agency the opportunity to gain a more complete picture of the SFA. If they identify the same problems that were identified during the previous cycle, this would establish that the SFA did not implement corrective actions across all schools or failed to continue these corrective actions.

### **10. If a school is using items like chicken nuggets and canned peaches, is it really necessary to visit the “central production kitchen” when you are reviewing a receiving or satellite school?**

Yes, it is important to visit the “central production kitchen” for the following reasons:

- Ensure that foods in the nutrient analysis are the same as those being prepared and served. The reviewer must always check food labels for ingredients, nutrients, and food classifications, such as low fat and nonfat, at the preparation kitchen.
- Check menus with food production records to identify if/when the central kitchen or satellite kitchen made menu substitutions, along with the required documentation.
- Interview cooks to determine they are using the cooking methods identified in the nutrient analysis.
- Observe food preparations to ensure that food is prepared and portioned according to recipes and by safe and sanitary methods.

### **11. Are SMI entrance conferences mandatory?**

While it is highly recommended to conduct an entrance conference, it is not regulatory. However, the State agency must contact the SFA prior to or during the SMI review to gather and verify specific information such as menus, food production records, menu

## **SMI REVIEW PROCEDURES AND REQUIREMENTS (Continued)**

planning approach(s) and modifications, nutrient analyses (if applicable), food preparation sites, and types of food preparation. This initial contact lets the SFA know the purpose of the SMI review, what to expect during an SMI review, and the possibility of corrective and fiscal action.

### **12. Should a State agency tell an SFA, prior to the onsite visit, which school(s) has been selected for the SMI review?**

This is a State agency decision. There are some situations that the State agency would have to let the SFA know. For example, if the SFA is on food-based menu planning and the State agency wants to conduct the nutrient analysis prior to the SMI review, the SFA must know which records to supply.

### **13. Must a State agency schedule SMI and CRE reviews during the same school year (July 1 to June 30)?**

While it highly recommended that the SMI and CRE review of an SFA be conducted within the same school year, it is not required.

### **14. Are there tolerance ranges for SMI nutrition standards that do not require corrective action?**

The State agency must require corrective action whenever an SFA's analyzed menus do not meet the SMI nutrition standards since there are no tolerance ranges identified in Federal regulations.

### **15. The 1995 Dietary Guidelines do not emphasize whole grains; however, the reviewers' guide, under the qualitative review sections, says review menus for whole grains. Please justify.**

According to the 1995 Dietary Guidelines for Americans:

“Fiber is found only in plant foods like **whole-grain breads and cereals**, beans and peas, and other vegetables and fruits. Because there are different types of fiber in foods, choose a variety of foods daily. Eating a variety of fiber-containing plant foods is important for proper bowel function, can reduce symptoms of chronic constipation, diverticular disease, and hemorrhoids, and may lower the risk for heart disease and some cancers. However, some of the health benefits associated with a high-fiber diet may come from other components present in these foods, not just from fiber itself. For this reason, fiber is best obtained from foods rather than supplements.”

The 2005 Dietary Guidelines recommend that Americans consume three or more ounce-equivalents of whole-grain products per day, with the rest of the recommended

## SMI REVIEW PROCEDURES AND REQUIREMENTS (Continued)

grains coming from enriched or whole-grain products. In general, at least half the grains should come from whole grains.

- 16. Originally, when SMI was implemented, State agencies were told that as long as an SFA was “moving toward” compliance—(development of standardized recipes, for example) the review could be closed after progress was documented.**

**Now SA is being told that they must conduct a nutrient analysis to close a review. Is this correct?**

When SMI was first introduced, USDA allowed SFAs to be moving toward compliance with the *nutrient standards*; USDA has always held that a *nutrient analysis is necessary* to determine whether or not the SFA is complying with the nutrient standards. 7 CFR 210.19 (a) (iii) and (iv) state that the State agency, when reviewing a school using a nutrient-based menu planning approach, shall assess the nutrient analysis to determine if the SFA is properly applying the methodology necessary to conduct the nutrient analysis, and the State agency, when reviewing a school using a food-based menu-planning approach, shall conduct a nutrient analysis in accordance with procedures.

SMI regulations have now been in effect since 1995. SMI is a part of meeting meal requirements. SFAs must effectively implement the SMI requirements for healthy meals. A complete and accurate nutrient analysis must be part of every SMI review. State agencies must require that SFAs correct any findings so that nutrient analyses accurately reflect the menus and that the SFA’s menus meet the SMI nutrition standards.

- 17. Why is an evaluation to see if food-based components are met part of SMI? Isn’t this part of CRE?**

Implementing the menu planning approaches correctly is an important factor in meeting SMI nutrition standards. Food components/food items are the basis for meal patterns in the food-based menu planning approaches. The menus served by SFAs using food-based menu planning approaches must meet meal pattern requirements (they must be serving reimbursable meals) as well as meeting the nutrient standards.

- 18. When does a State agency have to conduct another nutrient analysis as part of SMI? If analysis shows a nutrient deficiency, is a re-analysis required to document proper corrective action has been taken?**

For food-based menu planning approaches, the State agency is not required to conduct a re-analysis if the SFA makes changes to menus based on SMI findings. The corrective action plan defines the actions the SFA must take, and the State agency decides the documentation to validate the corrective actions. The SFA’s

## **SMI REVIEW PROCEDURES AND REQUIREMENTS (Continued)**

progress in meeting the SMI nutrition standards will be noted in the next review cycle.

However, it would be beneficial to the SFA for the State agency to show how menu changes can affect the nutrition standards. This can be part of technical assistance where the reviewer can enter the **recommended or actual** menu changes into the computer nutrient analysis program and demonstrate that the corrective action would ensure that meals would meet the nutrient standards.

- 19. If a week of a menu has only two days, due to holiday or whatever—why wouldn't the reviewer just choose a different week, instead of combining other days?**

This is the reviewer's choice.

## USDA COMMODITIES

- 1. Small schools that use mostly USDA commodities frequently have menus that are high in total and saturated fat because these products are high in fat. What does USDA plan on doing to lower the fat in these products?**

Your statement contains a common misconception regarding USDA commodities. USDA's commodities are continually assessed for their quality, their acceptability to school children, and their ability to support the *Dietary Guidelines for Americans* and the Food Guidance System/MyPyramid. Over the past two decades, USDA has worked to reduce the levels of fat, sodium, and sugar in commodities that are made available to schools and other outlets. Improvements include:

- Reduced fat processed cheese blend
- 85% lean ground beef
- 90% lean ground beef patties
- Canned fruits packed in own juice or lite syrup
- 95% lean turkey ham
- 97% fat free water-added hams
- Tuna canned in water
- Low fat bakery mix
- Whole wheat flour
- Meatless spaghetti sauce
- Low Moisture Part Skim Lite Mozzarella cheese
- Blend of American Cheese and Skim Milk Cheese (Blended Cheese)
- Reduced Fat Cheddar cheese
- Reduced Fat Salad Dressing
- Low Saturated Fat Soybean Oil

- 2. The new commodity processed American cheese has a lower protein content per ounce than the old commodity cheese in database. (.6 or .5 g protein/ounce vs .7 g). Are we supposed to make schools use more cheese to make it equivalent to the old standard? We make them adjust cooked ham with water (deli) upwards to equate to non/water added product?**

No, one ounce of natural or processed cheese credits as one ounce of meat/meat alternate for food-based menu planning. The protein content is not directly taken into account, as evidenced by the variety of meats/meat alternates available to schools on a food-based menu planning approach, e.g., dry beans, nut butters, alternate protein products, etc. The yield of "ham, water added", must be adjusted because of the addition of water to the ham product. The *Food Buying Guide* yield for cooked ham, water added, indicates that 1.22 ounces of ham, water added, must be served to equal one ounce of cooked lean meat.



## USDA COMMODITIES (Continued)

### **3. When are you going to require commodity products to meet the nutrient standards?**

Individual foods will never be required to meet the nutrient standards. Federal regulations require that school meals meet the SMI nutrition standards when averaged over a school week. While individual foods are entered into the data, they are not considered by themselves, only as parts of the menus in the final analysis. Individual foods generally do not meet *all* of the nutrition standards; the menu planners must balance individual foods in meals to meet the nutrition standards.

## USDA TRAINING MATERIALS

### 1. When will the Offer Versus Serve manual and CD be ready?

The USDA *Offer Versus Serve* resource kit was mailed to all State agencies and SFAs in 2005. The *Leader's Guide*, transparencies, and Activity Sheets are also available for download in PDF format on the Team Nutrition website:

<http://teamn nutrition.usda.gov>. Click on “Resource Library” on the left side of the page; then page down to “Offer vs. Serve.”

### 2. When will USDA release the updated *USDA Quantity Recipes*?

In June 2006, USDA began mailing the *USDA Recipes for School Meals*, which is a consolidation of the 1988 *Quantity Recipes for School Food Service* and the 1995 *Tool Kit for Healthy School Meals*. The *USDA Recipes for School Meals* consists of a CD of all the recipes and a booklet, which is a consolidation of the information that was provided in the two previous publications, including: directions for reading the recipes (where/what all the information on the recipes is), reference charts, information on adjusting recipes, garnishing techniques, and other helpful information. The revised *USDA Quantity Recipes for Schools* are also available for download in PDF format on the Team Nutrition website at

<http://teamn nutrition.usda.gov>. Click on “Resource Library” on the left side of the page; then page down to “Recipes for Schools (USDA).”

### 3. Will the *Road to SMI Success* and guidance materials be available in Spanish or other languages?

Although there are no plans at this time to have these materials available in Spanish, it certainly is something USDA will consider in the future.

### 4. Where can we find a list of foods that have a Standard of Identity? The materials received at this training do not have a list of foods with Standards of Identity.

You can find a list of items with *Standards of Identity* in the 2<sup>nd</sup> Edition of *First Choice*, Appendix 8, page 215-221. If you do not have a print copy, go to [www.nfsmi.org](http://www.nfsmi.org) and click on “Resource Guide”, from the menu on the left side of the page. Then click on “Resource catalog—text only (HTML).” Next, click on “Purchasing.” Page down until you can click on “First Choice: A Purchasing Systems Manual for School Food Service, 2<sup>nd</sup> Edition,” then click on “Download from Web.” Page down until you get to “Appendix 8” and click on it. You can now

## USDA TRAINING MATERIALS (Continued)

download or print the information. The list gives the food name and the location to find details in the *Code of Federal Regulations* (CFR). Fruits and vegetables are found in 21 CFR. Meats, pizza, fats and oils are found in 9 CFR.

### **5. Does USDA plan to put *The Road to SMI Success* on the Internet?**

Yes, all of the Team Nutrition resources, after they are issued in print, are also made available on line for downloading.

### **6. Are there any resources available to schools that are transitioning to food-based or nutrient-based menu planning approaches that we can use to train teachers, parents, and students?**

USDA has two excellent resources: *The Road to SMI Success: A Guide for Foodservice Directors* and *A Menu Planner for Healthy School Meals*; both contain guidance on all menu planning approaches. State agencies and SFAs can use such information to train school staff and parents on requirements for specific approaches. This should help everyone to transition to a different menu planning approach.

## USING THE YIELD FACTOR METHOD IN NUTRIENT ANALYSIS

- 1. Are there going to be any more food items added to the moisture/fat changes list in Appendix H of the Nutrient Analysis Protocols?**

At this time, we have not received any requests to add food items to Appendix H. We would like to hear from States regarding the need for additional items that users would like to see added to Appendix H. Please share that information with us through your State Agency or Regional Office, as appropriate.

- 2. In NAP, Appendix G, Raw-to-cooked conversion factor, what is the reference measure—pounds or ounces, etc.?**

The raw to cooked conversion factor would be applied to the weight or volume of the food item, for example to pounds, ounces, or cups.

- 3. When entering a recipe for a baked product, how do you get from the portion of batter to the portion of baked product, taking into consideration the moisture and nutrient change that occurred during baking?**

Appendix H deals with Common Moisture and Fat Change Values for Purchased Prepared Products that are Fried. For baked products that are not fried (cakes, cookies, breads, etc.), there will be little change in nutrient value due to baking. The weight of the product will decrease slightly, with baking, but since the software calculates nutrients per serving, this change will not greatly affect the nutrient levels in the nutrient analysis. Be sure and select the cooked version of applicable food items added to the recipe, such as cooked eggs when the recipe calls for eggs.

- 4. How can recipes be accurate for foodservice production staff if the yield factor method is used for raw meat to cooked meat? For example, 12.81 lbs of cooked beef stew meat will appear on the nutrient analysis recipe—but cooks really need to prepare 21 lb. of raw meat. Must schools create two different recipes?**

Yes, a separate nutrient analysis (yield factor) recipe would need to be created for any recipe with yield changes due to cooking. USDA has recommended to software developers that provide production modules, that they provide a method to link the production recipe to the nutrient analysis recipe.

- 5. In the revision of the USDA quantity recipes, are nutrient analysis-only recipes being created, as well as production-only recipes? If nutrient analysis-only recipes are created, schools will not understand that the quantity listed is not the raw weight (even if that information is noted) or the as-purchased amount.**

Please refer to # 4 and 5 above for background. The printed updated USDA quantity recipes for use by school foodservice staff will show the production amounts, with a nutrient analysis of each recipe calculated by use of the yield factor method. Only

## USING THE YIELD FACTOR METHOD IN NUTRIENT ANALYSIS (Continued)

the nutrient analysis of the recipe will be added to the ingredient or food item file of the CN Database as is currently the practice.

- 6. Are the nutrient data of the USDA quantity recipes included in the software database reflective of weight of the cooked food item, e.g., cooked meat or cooked pasta?**

Yes, the USDA quantity recipes included in the Child Nutrition Database as ingredients or food items have been calculated to take into account the yields of the ingredients after cooking. The recipe items in the CN Database should be used when the USDA recipe card is followed *exactly*—using the first ingredient if there are alternate ingredients and not including the optional ingredients. If alternate or optional ingredients are used, then the recipe would need to be entered or modified for nutrient analysis (depending on your software).

- 7. Any chance USDA could put more of the “yield factor conversions” into the food items or ingredients in the USDA CN Database instead of expecting SFAs to make those conversions?**

USDA is exploring what kinds of resources are needed to do this. In the meantime, most software programs allow the user to add additional measures. For frequently used food items, the user could add a raw to cooked conversion measure from the *Food Buying Guide* to the cooked food item to make the process easier. Follow your software manufacturer’s directions for adding this information.

- 8. In the Nutrient Analysis Protocols, Appendix G indicates the average yield from prepared selected fruits and vegetables. How can malanga or yautia yield 120% and 100% after being peeled, diced, and cooked?**

Malanga and yautia are tuber vegetables, common in tropical countries, that absorb water during cooking, thus the increase in yield.

- 9. Without seeing how the software typically looks or functions, it’s really hard to follow some of the logic and the steps, especially regarding adding recipes to the user’s software database. For instance, the training segment that discussed choosing the “as consumed” food item from the software database was confusing to the novice nutrient analysis operator. Please summarize again.**

## USING THE YIELD FACTOR METHOD IN NUTRIENT ANALYSIS (Continued)

The steps to follow for adding a recipe to the software database using the yield factor method include:

- a. Select the correct food item from the database and select the *form of food as it is consumed*, e.g., peeled and raw or cooked, etc. The “form of food as it is consumed” means that you should select the food based on its state when it is eaten ,i.e., will the student be eating the food raw, peeled, cooked, etc?, and
- b. If applicable, calculate the amount to enter into the recipe by multiplying the amount called for in the recipe by the yield factor from the *Food Buying Guide*.

For example:

A recipe for steamed vegetables calls for 10 pounds of fresh, ready-to-use broccoli spears and 10 pounds of fresh prepared sliced yellow squash. You are purchasing fresh ready-to-use broccoli spears and fresh whole yellow squash that the foodservice staff will trim and slice.

First, you check the *Food Buying Guide* for broccoli and find that for *Broccoli, fresh, spears, trimmed, ready-to-use*, one pound as purchased yields one pound of cooked broccoli. Therefore, you should enter 10 pounds of cooked broccoli spears into the nutrient analysis recipe.

Second, you look up *Squash, fresh, yellow* and note (1) one pound as purchased yields .98 pound ready-to-serve or ready-to-cook squash (98% yield) and (2) one pound as purchased yields .83 pound cooked, sliced yellow squash (83% yield). Therefore, you must make 2 calculations to determine the cooked yield of 10 pounds of ready-to-cook squash.

First, you must determine how much raw, untrimmed squash you need to start with (the “as purchased” amount) to yield the 10 pounds of ready-to-cook squash called for in the recipe. This calculation is made by dividing the 10 pounds called for in the recipe by the ready-to-cook yield (98%). This calculation is as follows:  $10 \text{ pounds} \div .98 = 10.204 \text{ pounds}$  (round up to 10.21 pounds). This is the amount you must start with to yield 10 pounds of ready-to-cook sliced squash.

**USING THE YIELD FACTOR METHOD IN NUTRIENT ANALYSIS  
(Continued)**

Next, you must determine the cooked yield for 10.21 pounds of “as purchased” yellow squash. This calculation is made by multiplying 10.21 (the “as purchased” amount”) by the cooked yield (83%). This calculation is as follows:  $10.21 \text{ pounds} \times .83 = 8.474 \text{ pounds}$  (round down to 8.47 pounds of cooked, sliced yellow squash). Therefore, you would enter 8.47 pounds cooked, sliced yellow squash into the nutrient analysis recipe.