

USDA Administrative Review: Meal Pattern & Nutritional Quality

Meal Components and Quantities On-Site Questions: Day of Review	
School Level Questions	
400.	<p>Were all required meal components available on every reimbursable meal service line to all participating students</p> <p>a. Prior to the beginning of meal service?</p> <p>b. During the meal service?</p> <p style="color: red;">Tips: Ensure all students have access to all components on every reimbursable meal service line prior to service. Ensure that staff periodically checks on meal components in between services to ensure all required meal components are available on every reimbursable meal service line. For example, check to make sure the salad bar is stocked up in between 1st and 2nd grade meal service.</p> <p style="color: red;">Resources:</p> <ul style="list-style-type: none"> • School Nutrition Unit Menu Planning webpage: http://www.cde.state.co.us/nutrition/nutrimenuplanning
401.	<p>Did all meals observed for the day of review counted for reimbursement contain all of the required meal components?</p> <p style="color: red;">Tips: Refer to Menu Planning webpage for meal pattern requirements. Ensure that staff periodically checks on meal components in between services to make sure all required meal components are available on every reimbursable meal service line. For example, check to make sure the salad bar is stocked up in between 1st and 2nd grade meal service. If implementing Offer vs. Serve, ensure students take at least ½ cup fruit or vegetable.</p> <p style="color: red;">Resources:</p> <ul style="list-style-type: none"> • School Nutrition Unit Menu Planning webpage: http://www.cde.state.co.us/nutrition/nutrimenuplanning
402.	<p>Are the minimum daily quantity requirements met for the age/grade group being served?</p> <p style="color: red;">Tips:</p> <ul style="list-style-type: none"> • Recommend standardizing serving sizes (e.g. fruit and vegetable portions are ½ cup) to make it easier for students and staff • Recommend not splitting component contributions between two items (e.g. spaghetti provides 0.75 oz eq grain and roll provides 0.5 oz. grain) as this makes it difficult for students and staff to ensure the minimum required amount is taken • Recommend signage and using correct serving utensil size to help children select the correct amount of fruit and or vegetable • Ensure whole grain-rich grains represent at least 50% of weekly grain offerings. Any non-whole grain-rich grains must be enriched • Ensure juice does not exceed 50% of the weekly fruit component offerings <p style="color: red;">Resources:</p> <ul style="list-style-type: none"> • School Nutrition Unit Menu Planning webpage: http://www.cde.state.co.us/nutrition/nutrimenuplanning

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403.	<p>a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?</p> <p>Tips: Ensure milk coolers are completely stocked with at least two required milk varieties prior to service. If a flavored milk option is available (1 percent milk fat or less), an unflavored option (1 percent milk fat or less) must also be available.</p> <p>b. If milk substitutions are made, are they allowable?</p> <p>Tips: A licensed physician, advanced practice nurse with prescriptive authority or physician assistant can prescribe a substitute for a disability milk substitution and substitutions do not need to meet the nutrient requirements (juice is an allowable substitute). Non-disability milk substitutions must meet nutrient requirements (juice is not an allowable substitute). A parent may request a non-disability milk substitution but the school is not required to accommodate these.</p> <p>Resources:</p> <ul style="list-style-type: none"> • School Nutrition Unit Special Dietary Needs webpage: http://www.cde.state.co.us/nutrition/nutriSpecDietaryNeeds
404.	<p>Is there signage explaining what constitutes a reimbursable meal to students?</p> <p>Tips: Signage is required for both the School Breakfast Program and the National School Lunch Program.</p> <ul style="list-style-type: none"> • For breakfast in the classroom, signage helps with the communication piece w/ teachers/students and allows SFAs to avoid non-reimbursable meal issues. • Recommend SFAs create signage that is tailored to their specific menus. • Recommend SFAs use clear signage indicating milk <u>and</u> bottled water can <u>both</u> be taken (if bottled water is available) <p>Resources:</p> <ul style="list-style-type: none"> • School Nutrition Unit OVS webpage: http://www.cde.state.co.us/nutrition/nutriOfferVsServe
405.	<p>If the school has elected to serve meals using the Family Style Method, is the school implementing method as specified in FNS Instruction 783-9?</p> <p>Tips: It is the responsibility of the supervising adults to actively encourage each child to accept service of the full required portion for each food component of the meal pattern. Family Style meal service is encouraged for preschool-aged children, but could also be a good option for other age/grade groups</p> <p>Resources:</p> <ul style="list-style-type: none"> • USDA Offer vs Serve Guidance, 2014-2015: http://www.cde.state.co.us/nutrition/nutriOfferVsServe • SP 35-2011: http://www.fns.usda.gov/sites/default/files/SP35_CACFP23-2011os.pdf
406.	<p>If the school is serving multiple menus and/or age/grade groups, is the meal service structured to comply with the required age/grade group meal pattern requirements?</p> <p>Tips: Keep in mind the menus that overlap (ex. K-8 lunch menu, K-12 breakfast menu). For different grades, different meal service times might work best.</p> <p>Resources:</p> <ul style="list-style-type: none"> • School Nutrition Unit Menu Planning webpage: http://www.cde.state.co.us/nutrition/nutrimenuplanning

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407.	<p>a. Has the school complied with the planned menu for the day of review?</p> <p>b. If changes are being made to the planned menu, are the changes acceptable substitutions?</p> <p>Tips: For a planned menu that has been changed, evaluate the following:</p> <ul style="list-style-type: none"> • Will the vegetable subgroups still be met over the course of the week (if the change happens to change the vegetable subgroup)? • Will the weekly grain/MMA minimum be met over the course of the week? <p>Resources:</p> <ul style="list-style-type: none"> • School Nutrition Unit Menu Planning webpage: http://www.cde.state.co.us/nutrition/nutrimenuplanning
408.	<p>Did any findings noted in #400 - 408 result in the turning off of the Performance- Based Reimbursement?</p> <p>Tip: SA has discretion to turn of the Performance-Based Reimbursement if severe non-compliance is determined.</p> <p>Resources:</p> <ul style="list-style-type: none"> • AR Fiscal Action Guidelines https://www.cde.state.co.us/nutrition/nutrireviews • Guidelines for Expanded Testing on ARs https://www.cde.state.co.us/nutrition/nutrireviews

Meal Components and Quantities On-Site Questions: Review Period	
School Level Questions	
409.	<p>Review production records and other supporting documentation, did all reviewed meals during the review period indicate that all of the required meal components per weekly meal pattern requirements were offered and served to students?</p> <p>Tips: Utilize CDE School Nutrition Unit’s Menu Planning webpage to ensure all meals indicate that all of the required meal components per weekly meal pattern requirements were offered and served to students: https://www.cde.state.co.us/nutrition/nutrimenuplanning.</p> <p>Resources:</p> <ul style="list-style-type: none"> • School Nutrition Unit Menu Planning webpage: http://www.cde.state.co.us/nutrition/nutrimenuplanning
410.	<p>a. Do planned menu quantities meet meal pattern requirements for the review period?</p> <p>b. If NO to a, do production records and/or other supporting documentation for the review period indicate that the required quantities of food were available?</p> <p>Tips: Utilize your menu, production records, recipes, and product documentation (CN label, PFS, etc.) to ensure that all components offered meet both the daily and weekly meal pattern requirements. If multiple entrees are served, make sure to count the entrée with the minimum component amount towards the weekly minimum meal pattern requirements. Ensure all documents are correct and match (ex. production record states the same component contribution as the CN label).</p>

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	<p>Resources:</p> <ul style="list-style-type: none"> • School Nutrition Unit Menu Planning webpage: http://www.cde.state.co.us/nutrition/nutrimenuplanning • School Nutrition Unit Online Training webpage: http://www.cde.state.co.us/nutrition/trainingannualonline
411.	<p>a. Did the school comply with the planned menu for the review period?</p> <p>b. If changes are being made to the planned menu, are the changes acceptable substitutions?</p> <p>Tips: For a planned menu that has been changed, evaluate the following:</p> <ul style="list-style-type: none"> • Will the vegetable subgroups still be met over the course of the week (if the change happens to change the vegetable subgroup)? • Will the weekly grain/MMA minimum be met over the course of the week? <p>Resources: School Nutrition Unit Menu Planning webpage: http://www.cde.state.co.us/nutrition/nutrimenuplanning</p>
412.	<p>Did any findings noted in #410 - 412 result in the turning off of the Performance- Based Reimbursement?</p> <p>Tip: SA has discretion to turn off the Performance-Based Reimbursement if severe non-compliance is determined.</p> <p>Resources:</p> <ul style="list-style-type: none"> • AR Fiscal Action Guidelines https://www.cde.state.co.us/nutrition/nutrireviews • Guidelines for Expanded Testing on ARs https://www.cde.state.co.us/nutrition/nutrireviews

Offer versus Serve On-Site Questions: Day of Review	
School Level Questions	
500.	<p>Is Offer vs. Serve being implemented properly by the reviewed school?</p> <p>Tips: OVS is required for the senior high level for lunch and has different requirements for the School Breakfast Program and National School Lunch Program (i.e. breakfast requires 4 <u>items</u> to be offered and 3 <u>items</u> to be taken, one of which must be ½ cup of fruit or vegetable while lunch requires 5 <u>components</u> to be offered and 3 <u>components</u> taken, one of which must be ½ cup of fruit or vegetable). Monitor staffs implementation and training/understanding of OVS for breakfast and lunch.</p> <p>Resources:</p> <ul style="list-style-type: none"> • School Nutrition Unit OVS webpage: http://www.cde.state.co.us/nutrition/nutriOfferVsServe • School Nutrition Unit Training webpage: http://www.cde.state.co.us/nutrition/nutritrainings
501.	<p>Has the cafeteria staff been trained on Offer vs. Serve?</p> <p>Tips: Assess all staff that have a role within the school meals programs and their need to be trained in Offer vs. Serve. For example, if a teacher monitors the salad bar after the POS (and SFA has an Alternate POS form on file), then that teacher will need to receive Offer vs. Serve training.</p>

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	<p>Resources</p> <ul style="list-style-type: none"> • School Nutrition Unit OVS webpage: http://www.cde.state.co.us/nutrition/nutriOfferVsServe • School Nutrition Unit Training webpage: http://www.cde.state.co.us/nutrition/nutritrainings
502.	<p>Is there signage explaining what constitutes a reimbursable meal to students including the requirement to select at least ½ cup fruit or vegetable?</p> <p>Tips: Remember there needs to be signage for both breakfast <u>and</u> lunch explaining what constitutes a reimbursable meal. For breakfast in the classroom, signage helps with the communication piece w/ teachers/students and allows SFAs to avoid non-reimbursable meal issues.</p> <p>Resources:</p> <ul style="list-style-type: none"> • School Nutrition Unit OVS webpage: http://www.cde.state.co.us/nutrition/nutriOfferVsServe • School Nutrition Unit Training webpage: http://www.cde.state.co.us/nutrition/nutritrainings

Module: Dietary Specifications and Nutrient Analysis – targeted menu review school only						
School Level Questions						
603.	<p>Were any areas identified during the off-site review requiring technical assistance or corrective action prior to the beginning of the on-site portion of the review?</p> <p>If so, explain.</p>	NSLP		SBP		
		YES	NO	YES	NO	N/A
<p>Tips: For grains, refer to Exhibit A to see which grain items are only allowed as dessert at lunch. This will be noted with a superscript of 3 on Exhibit A. Superscript 4 will denote it is an allowable dessert for breakfast and lunch.</p> <p>Resources:</p> <ul style="list-style-type: none"> • School Nutrition Unit Menu Planning webpage: http://www.cde.state.co.us/nutrition/nutrimenuplanning 						
604.	<p>If Option 1 is selected to complete the targeted menu review (i.e. completed the off-site portion of the Dietary Specifications Assessment Tool), what was the on-site validation of the risk determination?</p>	Low-Risk	High-Risk	N/A		
<p>Tip: Completion of Option 1 (the off-site portion of the Dietary Specifications Assessment Tool) will indicate if the SFA is at high risk or at low risk of being out of compliance with dietary specifications.</p> <p>Resources:</p> <ul style="list-style-type: none"> • School Nutrition Unit Menu Planning webpage: http://www.cde.state.co.us/nutrition/nutrimenuplanning 						

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605.	Based on the targeted menu review, did the school meet the Dietary Specifications (Calories, Saturated Fat, Sodium, and Trans Fat) for the appropriate age/grade group being served? If NO, list all the errors identified and the technical assistance provided. Indicate whether the violations identified were repeat violations for the SFA. Record only the number of meals counted for reimbursement that will be subject to fiscal action on the S-1, 18A.						
		NSLP			SBP		
		YES	NO	N/A	YES	NO	N/A

Tip: The SA must assess meal components and quantities before conducting a dietary nutrient analysis. The SA must conduct a weighted nutrient analysis for high-risk schools for severe non-compliance in, but not limited to, the following findings:

- Missing meal components
- Missing vegetable subgroups
- Missing production records
- Inadequate quantities (systemic issue, as determined by expanded review)
- Minimum quantity requirements not met for grains and or meats/meat alternates (systemic issue)

Note: the SA has the discretion to conduct a nutrient analysis and is encouraged to do so if it has concerns about the SFA's food service practices.

Resources:

- Nutrient Analysis Protocols: <http://healthymeals.nal.usda.gov/hsmrs/Software/For%20Web/NAPManual.pdf>
- School Nutrition Unit Menu Planning webpage: <http://www.cde.state.co.us/nutrition/nutrimenuplanning>

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