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# STATE MONITORING OF NATIONAL SCHOOL LUNCH PROGRAM NUTRITIONAL CONTENT

State by State Results — Appendix

Liisa Hiatt and Jacob A. Klerman

RAND  
Labor and Population

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State by State Results — Appendix

Liisa Hiatt and Jacob A. Klerman

*MR-1296/I-USDAFNS*

Prepared for the  
United States Department of Agriculture—Food and Nutrition Service

**RAND**  
Labor and Population

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## PREFACE

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This study was conducted within RAND's Center for the Study of Food and Nutrition Policy as part of RAND's Child Nutrition Analysis Project (CNAP) with the U.S. Department of Agriculture's Food and Nutrition Service. This report details a study of state nutritional monitoring data. It is aimed at anyone interested in the operation of child nutrition programs.

This is a companion to the case studies of the School Meals Initiative (SMI) review process of seven states, containing their responses to a detailed questionnaire. The analysis of the responses is provided in a separate Liisa Hiatt and Jacob Alex Klerman monograph report, *State Monitoring of National School Lunch Program (NSLP) Nutritional Content*, RAND MR-1296-USDAFNS.

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## CONTENTS

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Preface .....	iii
Summary .....	vii
Acknowledgments .....	ix
Acronyms .....	xi
Chapter One	
CALIFORNIA .....	1
Background Questions .....	2
Process in the State .....	5
Data Elements .....	9
Chapter Two	
GEORGIA .....	11
Background Questions .....	11
Process in the State .....	15
Data Elements .....	20
Chapter Three	
NEBRASKA .....	21
Background Questions .....	21
Process in the State .....	25
Data Elements .....	30
Chapter Four	
NEW JERSEY .....	33
Background Questions .....	33
Process in the State .....	36
Data Elements .....	41

<b>Chapter Five</b>	
NEW YORK . . . . .	43
Background Questions . . . . .	43
Process in the State . . . . .	46
Data Elements . . . . .	51
<b>Chapter Six</b>	
TEXAS . . . . .	53
Background Questions . . . . .	53
Process in the State . . . . .	56
Data Elements . . . . .	61
Process in Texas, Region XIII, ESC . . . . .	62
Process Questions . . . . .	62
Data Elements . . . . .	67
<b>Chapter Seven</b>	
WISCONSIN . . . . .	69
Background Questions . . . . .	69
Process in the State . . . . .	73
Data Elements . . . . .	78

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## SUMMARY

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What follows are the responses from officials of the state Departments of Education of California, Georgia, Nebraska, New Jersey, New York, Texas (including Region XIII), and Wisconsin to a questionnaire put forth to aid in analyzing the School Meals Initiative program. Each chapter begins with a list of participants.

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## ACKNOWLEDGMENTS

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We thank the staff of the seven state monitoring agencies we visited. They were uniformly gracious hosts who shared their time generously and candidly answered our questions.

Within RAND, this report has benefited from Paul Steinberg's work as a Communications Analyst and from Natasha Kostan and Christopher Dirks, who provided secretarial support. Joy Goodwin helped with the preparation of the original proposal, and Mina Kimmerling helped with some of the fieldwork. Lynn Karoly provided useful internal RAND reviews.

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## ACRONYMS

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BOCES	Board of Cooperative Educational Services
CESA	Cooperative Educational Service Agency
CNAP	Child Nutrition Analysis Project
CRE	Coordinated Review Effort
DGA	Dietary Guidelines for Americans
EIAC	Education Information Advisory Committee
ESA	Educational Services Agency
ESC	Educational Service Center
FNS	Food and Nutrition Service
FR	Federal Register
GPRA	Government Performance and Results Act
NSLP	National School Lunch Program
NSMP	Nutrient Standard Menu Planning
NuMenus	Nutrient Standard Menu Planning System
RCCI	Residential Child Care Institution
RDA	Recommended Daily Allowance
RE	Retinyl Equivalents

SBP	School Breakfast Program
SFA	School Food Authority
SFP	Summer Feeding Program
SMI	School Meals Initiative
SNDA	School Nutrition Dietary Assessment
TEA	Texas Education Agency
USDA	U.S. Department of Agriculture

**Date of Interview: June 21, 1999**

Name: Jean Naylor  
Agency: State Department of Education, Field Services Unit  
Title: Child Nutrition Supervisor II

Name: Louise Casias  
Agency: State Department of Education, Field Services Unit  
Title: Child Nutrition Supervisor I

Name: Violet Henry  
Agency: State Department of Education, Field Services Unit  
Title: Child Nutrition Supervisor I

Name: Valerie Fong  
Agency: State Department of Education, School Nutrition  
Programs Unit  
Title: Staff Services Manager II

Name: Jan Barnhouse  
Agency: State Department of Education, Nutrition Standards Unit  
Title: Child Nutrition Supervisor I

Name: Andrew Laufer  
Agency: State Department of Education, Field Services Unit  
Title: Child Nutrition Supervisor I

Name: Cindy Schneider  
Agency: State Department of Education, Nutrition Standards Unit  
Title: Child Nutrition Consultant

Name: Marilyn Briggs  
Agency: State Department of Education, Nutrition Services Division  
Title: Director

## BACKGROUND QUESTIONS

1. How many School Food Authorities (SFAs) are there in your state?

There are 1,496 SFAs. About 400 are residential child care institutions (RCCIs).

2. How do you define an SFA? Is it a school district or something else?

SFAs are usually school districts. Private schools and RCCIs are usually their own SFAs.

3. When did your state begin SMI reviews?

In 1997–1998.

4. How many SMI reviews were completed in

1996–1997? A few reviews were conducted, but some of the agencies still had waivers to omit reviews. Most of the time was spent on training and on-site technical assistance.

1997–1998? 107 reviews.

1998–1999? 99 reviews (however, when they are all in, this will probably be closer to 200).

5. How do you define a completed review?

Right now, a completed review is one that has been closed out. However, if the SFA could not get all the necessary information, no nutrient analysis information will be available. This is most common with RCCIs. The SFA has to show that it is moving towards completion of nutrient analysis.

6. When do you expect to complete the first round of School Meals Initiative (SMI) reviews?

In 2001–2002.

7. Do you think your state will need to make any changes in the future to process or staffing in order to complete the SMI reviews in five years?

The Field Services Unit will be adding two full-time child nutrition positions this year and probably one more next year. The Nutrition Standards Unit will add two child nutrition assistants to perform nutrient analysis.

8. Are SMI reviews done in conjunction with Coordinated Review Effort (CRE) reviews?

Yes, they are done in conjunction with CRE reviews.

9. If you do SMI reviews in conjunction with the CRE, did you have to add staff to do this? What kind of training was involved?

The same staff that was doing CRE reviews is now doing SMI reviews as well. One child nutrition consultant has been added since the SMI reviews began. The staff responsible for summer programs has been doing the reviews of the Residential Child Care Institutions (RCCIs).

10. Do your reviewers have access to e-mail?

Yes. However, there have been some problems with e-mail for people who are not based in the Sacramento office. The problems should be fixed in the next few months.

11. Do your reviewers have access to the Internet?

Some do. Currently, some of the reviewers have Internet access. When the e-mail system is fixed, all reviewers will have Internet access.

12. Is there any other software (e.g., MS Excel) that reviewers use for completing reviews? If so, what? Is the same software used at the state level and at the SFA level?

Yes. All reviewers and staff in the state office have Word, Excel, and Nutrikids. However, staff at the state agency are currently evaluating the Nutrikids software and all the other approved packages to see what is best for them. There has been a big problem with Nutrikids at the state level because the program was designed for one school. The state agency needs to keep all open nutrient analyses on it, and

that has not been possible. The state has fixed the problem temporarily, but possibly not completely.

13. How many people are involved in doing SMI reviews and analysis?

There are 25 people: 23 reviewers (22 of whom have nutritional backgrounds) and two data-entry staff.

14. Where are they located? For whom do they work?

Four of the reviewers and the data entry staff are in the office in Sacramento. The rest are located throughout the state. They all work for the Department of Education.

15. What are each of their roles in the SMI reviews?

The reviewers are responsible for going to the SFA and collecting the necessary information. They also work with the SFA to develop an improvement plan. Even if the SFA meets all nutrient standards, there is usually some improvement plan. In cases where the SFA runs its own nutrient analysis, the state agency verifies that it was done correctly. The reviewers also do some nutrient analyses themselves. The data entry people enter the information from the reviewers into Nutrikids and run the analyses. They also contact the reviewer and the SFA if there is essential information missing.

16. Does the state agency have access to the nutrient analysis information?

Yes.

17. Do you feel that the SMI reviews are necessary to bring school meals into compliance with the Dietary Guidelines for Americans and the Recommended Daily Allowances?

Yes. Nutrient analyses are helpful but alternate analyses may be more appropriate in some instances. The RCCIs should be allowed to use an enhanced meal pattern instead of full nutrient analysis. They have very high staff turnover, and they are in a home setting, so meal planning is only a small part of their responsibilities. The state has been working on developing a tool that the RCCIs could use as an alternative. It would be very user-friendly and be based on the food

guide pyramid. If the RCCIs followed it, they would know how much of each nutrient the children were getting.

18. Do you think it would be difficult for the reviewers in this state to provide information to the Food and Nutrition Service (FNS) directly?

Yes. Most of the reviewers do not have the capability to send the information directly. Also, most of the nutrient analyses are done by staff in the state office and not by the reviewers themselves.

### **PROCESS IN THE STATE**

1. Who collects the raw information for nutrient analyses on food offered in any given SFA?

The reviewers.

2. With what organization is this person employed?

The State Department of Education.

3. In what format is the information collected? Does this format change over the course of the review? For example, if the initial information is collected on hard copy, is it ever converted to an electronic version?

The information is collected in hard copy and then entered into Nutrikids for the nutrient analysis. A hard copy of the analysis is printed and saved in the SFA's file, and the information from the analysis is saved on computer. The state agency has just started an Access database in which to keep the information.

4. Who performs the nutrient analysis of this information?

Some reviewers complete the nutrient analyses themselves. Most analyses are done by the two data entry staff in the Nutrition Standards Unit at the state office. In addition, some SFAs do their own analyses. In these cases, the reviewer makes sure that they are done correctly before they are sent to the state.

5. Are there any steps between the initial collection of information and the nutrient analysis? If so, what are they and who performs them?

The information is collected by the reviewers and sent to the Nutrition Standards Unit. If there are missing items or questions, the data entry staff may go back to the reviewers or the SFA for more information.

6. Is the nutrient analysis ever revised after it is initially performed? If so, when and by whom? Where is the revision information recorded?

The Nutrition Standards Unit does not revise analyses done at the state agency. If an analysis is done by a reviewer, the Nutrition Standards Unit may make minor changes and request a revision. In these cases, the analysis is sent back to the reviewer. The reviewer then follows up with the SFA and provides suggestions for improvement. The SFA has to report back on what it is doing to improve. The improvement plan is decided on by the reviewer and the SFA together.

7. How often are nutrient analyses usually revised?

They are usually not revised.

8. Are data elements ever added or deleted from the information during this process?

No. Clarification of the information may be obtained by the reviewer if the agency has questions, but items are not added or deleted.

9. Is the information aggregated in some way other than at the state level? For example, at a district or regional level? If so, at what level?

No, it is only aggregated at the state level.

10. Where are SFA-level records kept and in what format?

If the SFA or the reviewer does the analysis, then the backup detail is not passed on to the state. Only the analysis itself is sent to the state. When the state does the analysis, then all the backup detail is kept on file as well. In either case, the analysis itself is kept at the state agency in both hard copy and electronic format.

11. When is the information sent to the state and by whom?

The reviewer sends the information directly to the state after the review at the SFA is completed.

12. How is the information sent to the state? Electronically? Hard copy? If electronically, please describe the protocols used. For example, is the information recorded on a diskette? Sent by e-mail? Other?

Currently, everything is sent to the state in hard copy. It would be ideal if information could be sent in electronic format. However, that is probably not something that will happen in the immediate future.

13. Where is the information kept and in what format? If applicable, please give a name and telephone number for the person who would have this information at the state level.

Nutrikids analyses: Kathy Mackey.  
Access data base: Jean Naylor.

14. Does the state do an independent nutrient analysis for SMI reviews, or does the state review existing analyses, or both? In which cases does the state do independent reviews? In which cases does the state review nutrient analyses performed elsewhere? (Keep in mind that it is possible for the state to do both if it reviews nutrient analyses done by an SFA using a NuMenus or Assisted NuMenus system but does the actual nutrient analyses for SFAs using food-based systems.)

If the SFA uses NuMenus, the reviewers review the existing analysis if it is conducted on USDA-approved software, but the analysis is not redone by the state. If there is no approved analysis for the NuMenus or if the SFA uses a food-based system, the staff at the state office conduct the analysis.

15. At what point would it be best to have the nutrient analysis information sent to the FNS? From the state? From the reviewers themselves? Why?

It would be best to send the information directly from the state rather than from the reviewers. The state does most of the analyses. Also, in 1998–1999 the state was starting to put the results of the analyses in a database, which could easily be sent to the FNS as often

as necessary. The database can be amended to contain any information that the FNS requires.

16. Which of these steps, if any, would need to change in order to meet the FNS's goals for the selected data elements being sent in electronic format?

None of them.

17. It is possible that, in the future, the FNS may be able to negotiate with the companies that have created the nutrient analysis software to add a function where you would be able to create the report for the FNS right from the software. If that were to happen, what changes would you need to make to your current procedure?

Probably none. However, there is some concern about the analysis information being sent directly to the FNS without being reviewed by anyone at the state. Also, the state would want to get a copy of the information for its files.

18. Which of the required data elements are currently missing from the software package you are using for your nutrient analyses?

Average daily number of lunches served during the week in which the analysis was done. The reviewers can get the average daily number of lunches for the month or day for the whole SFA or for the reviewed school, but they cannot get the average daily number of lunches for each meal plan within the SFA. State staff asked whether the average daily number of lunches could be estimated.

19. If the software companies do not agree to add this function, how will you incorporate the additional elements into an electronic report for the FNS?

The state will add them to the database.

20. Do you think that there are any data elements that should be added to or deleted from the list to send to the FNS? If so, which items and why?

The state staff were not sure why average daily number of meals served for the week in review is necessary. They also thought that the name of the SFA should be added.

21. Do you have any opinion on sending the information to the FNS electronically? Will this create any problems for your state?

It should not be a problem.

22. How often do you think the states should have to report this information to the FNS? The FNS is required to prepare an annual strategic plan. Therefore, it is leaning toward annual collection of this information. Would this cause problems for your state?

The state can send the information as often as the FNS wishes because the information can come directly from its database. Annually would not be a problem.

23. Can you think of any alternatives for any of the processes we have discussed so far?

The staff would prefer to send the information from the Access database rather than setting up a new report for the FNS. The database could be altered to have whatever information the FNS needs.

24. The FNS would like us to solicit comments from the state about this process. Do you have anything that you would like us to pass on to them?

It is a good idea to have a consistent reporting system. The staff are also interested in knowing how California compares with other states, since there is currently no way to know this. Most SFAs in the state use food-based menu systems; the state consultants do those analyses. The nutrient-based systems, in which SFAs do their own analyses, tend to be mostly in elementary schools—probably because the elementary school children have less choice in what they eat. Also, food-based systems are more familiar to people used to the old meal plans.

## DATA ELEMENTS

The state staff felt that these data elements were fine. They suggested adding "Name of the SFA" and a comment field for the meal plan type, so that the person filing the report could specify what the "Other" choice was, if necessary. They also discussed changing the

dates to give the dates for the review week and the date the review was closed (as opposed to completed). Finally, they suggested further consideration of the data element that asks for the average daily number of lunches served for the week in review. This would be very difficult to collect, so estimation may be appropriate.

They also suggested adding a line showing that the first set of listed nutrients asks for the actual output from the nutrient analysis, whereas the second list is the standard to which the first is being compared to clarify that it is not a duplicate list.

**Date of Interview: July 27, 1999**

Name: Annette Bomar Hopgood  
Agency: Georgia Department of Education  
Title: Director, School and Community Nutrition

Name: Judieth Hunt  
Agency: Georgia Department of Education  
Title: Education Grant Program Consultant

Name: Eugenia Seay  
Agency: Georgia Department of Education  
Title: School Nutrition Program Manager

**BACKGROUND QUESTIONS**

1. How many SFAs are there in your state?

There are 180 SFAs.

2. How do you define an SFA? Is it a school district or something else?

SFAs are defined based on the school district. This is a federally based definition. The number 180 includes public schools only. There are also approximately 40 private and state institutions, including five RCCIs.

3. When did your state begin SMI reviews?

In 1996–1997.

4. Why did you start then as opposed to earlier or later?

Georgia started early because it had already begun a similar evaluation system that was designed to study how well the school lunch programs were working. Since a program was already in place, it was not hard to start the SMI reviews. "We were just validating the work that had begun."

5. How many SMI reviews were completed in

1996–1997? five reviews.

1997–1998? 32 reviews.

1998–1999? 41 reviews.

6. How do you define a completed review?

A review is complete when the analysis is done and the SFA is certified to have met the guidelines. If the initial analysis shows that the SFA does not meet the guidelines, then a correction plan is implemented. A new analysis is then performed, based on the corrections, but the original analysis goes on file with the review. Although the standard is to do weighted analyses, the USDA has given Georgia a waiver to do unweighted analyses. An SFA may thus meet the federal guidelines with a weighted analysis, but it also has to meet the state guidelines with a unweighted analysis.

7. When do you expect to complete the first round of SMI reviews?

In 2001–2002.

8. Do you think your state will need to make any changes in the future to process or staffing in order to complete the SMI reviews in five years?

To complete the SMI reviews, the state office will have to contract for some help to do the nutrient analyses because the process is extremely resource-intensive. All of the nutrition labels and other data the office has received must be entered into Nutrikids. This is the simplest nutritional analysis system, so everyone in the state office has switched over and is now using it.

9. Are SMI reviews done in conjunction with CRE reviews?

Yes, they are done in conjunction with CRE reviews.

10. If you do SMI reviews in conjunction with the CRE, did you have to add staff to do this? What kind of training was involved?

The consultants had to start taking support staff along on the site visits. The department could not add new employees merely because there was a new regulation. Instead, it had to increase the number of functions that each person performed. Contract help has not yet been found and funds are limited in FYs 1999 and 2000 due to another priority one-time project, so the five secretaries in the field offices are now doing field work (information collection and data entry).

11. Do your reviewers have access to e-mail?

Yes, they all have e-mail in the office and some have it in the field. They can get laptops provided by the state.

12. Do your reviewers have access to the Internet?

Yes, the same as e-mail access.

13. Is there any other software (e.g., MS Excel) that reviewers use for completing reviews? If so, what? Is the same software used at the state level and at the SFA level?

No. The staff tried using different software to do the CRE reviews, but they found it very laborious and difficult to use. Therefore, this was not attempted for SMI reviews. They have access to File Maker Pro and Excel, but these are not used for SMI reviews.

14. How many people are involved in doing SMI reviews and analysis?

There are eight consultants, five secretaries (working in the field), two typists, and two supervisors (17 people).

15. Where are they located? For whom do they work?

The consultants and secretaries are spread out around the state in the field offices. They all work for the Department of Education. The department is thinking of contracting out some part of the work when education funds are available.

Georgia asked the USDA to waive the nutrient analysis where schools are not ready for it as evidenced by lack of "basic practices," such as

portion control. However, the waiver request was denied. The way that data are examined needs to be changed. Just looking at numbers and nutrient analyses does not clarify the current picture. It may look as if everything in the schools is working fine. Although the nutrient analysis looks perfect, portion controls and standardized recipes may not be followed—the data doesn't reflect the fact that portions may be larger than planned and recipes are not standardized. The schools really need to learn basic practices (such as portion control and standardized recipes) before they are judged on how they are doing with a nutrient analysis. Without these basic practices there is no underlying support in the schools for nutrient analysis. SMI “puts the cart before the horse” by asking for the data without teaching the schools how to do what they need to do.

16. What are each of their roles in the SMI reviews?

The secretaries help collect the information in the field and do data entry. The consultants (all registered dietitians and licensed dietitians) observe the meals and do all the tasks for the site visit. They have training and know about food service. They also do nutrient analyses. The typists write the letters to the schools. One local SFA hired an agency to subcontract out some of the reviews, but it was only able to complete one (although it did an excellent job).

17. Does the state agency have access to the nutrient analysis information?

Yes.

18. Do you feel that the SMI reviews are necessary to bring school meals into compliance with the Dietary Guidelines for Americans and the Recommended Daily Allowances?

No, doing these reviews is not getting them anywhere. As the regulations are written, the reviews are not bringing the meals into compliance. The regulations need to be sequential. The staff think that the FNS could get more out of doing more training. Currently, the NSLP has to rely on managers to train employees. The training needs of site-level employees should be a bigger priority.

At the district level, directors have master's degrees and training to know what best practices are. However, they cannot be in the schools every day. Therefore, schools do not always follow best

practices. At the school level, a cook may put in 1.5 pounds of butter when the recipe calls for a pound, because the kids will like the food better. Currently, the state has a policy of "training the trainer," but this does not always ensure that everyone gets the best training.

19. Do you think it would be difficult for the reviewers in this state to provide information to the FNS directly?

Providing the information is not the question. The state office will not provide the information voluntarily, but if the regulations say it has to, it will. However, this is an inefficient way for the FNS to try to evaluate data. The data may show an excellent nutrient analysis when the reality is that portion control and standard recipes are not being followed. This needs to be corrected. The money and time spent on doing nutrient analysis would be better spent on training school-level personnel in best practices.

## **PROCESS IN THE STATE**

1. Who collects the raw information for nutrient analyses on food offered in any given SFA?

Consultants and secretaries. If the state hires a subcontractor, that organization would be expected to collect the information in the future.

2. With what organization is this person employed?

Georgia Department of Education.

3. In what format is the information collected? Does this format change over the course of the review? For example, if the initial information is collected on hard copy, is it ever converted to an electronic version?

Information is collected in hard-copy format. The state is required to keep the information for three years plus the current year. The secretaries input the information into Nutrikids. The more menu choices the kids have, the more work there is for staff. This is a disincentive for providing more choices. (The staff looked at the folder of information on one school's meals for a week, and there were hundreds of labels and recipes that had to be input for one week's worth of meals.) Even though Nutrikids has a database that they can use so

that they do not have to enter raw nutrient data on everything, a lot of recipes and foods are not there. Even some foods from the USDA commodities program aren't programmed into the system's nutritional database.

4. Who performs the nutrient analysis of this information?

Consultants do the analyses and secretaries enter the data.

5. Are there any steps between the initial collection of information and the nutrient analysis? If so, what are they and who performs them?

The information is collected on-site. Some information can be sent ahead of time. This depends on the school district. Very few districts (about five) use NuMenus. Therefore, the state has to do most of the nutrient analyses.

6. Is the nutrient analysis ever revised after it is initially performed? If so, when and by whom? Where is the revision information recorded?

A corrective action plan is formulated, and the SFA changes its menus accordingly. A reanalysis is then done based on those changes. If the SFA uses a food-based system, the state consultants redo the analysis. If the SFA uses a nutrient-based system, it does the reanalysis itself. This is an ongoing process. SFAs have to show that they are "moving toward" good nutrient content. The new analysis is not part of the initial review. Once the SFA has been given a corrective action, it moves to the next phase.

7. How often are nutrient analyses usually revised?

About 50 percent require reanalysis and another site visit. The consultants need to do another site visit to make sure that the school is doing what it says it is doing. This is basically technical assistance.

8. Are data elements ever added or deleted from the information during this process?

No.

9. Is the information aggregated in some way other than at the state level? For example, at a district or regional level? If so, at what level?

Information is not aggregated at a higher level. Data for those SFAs that have not yet been certified are not appropriate for analysis at a higher level. In the future, there may be some benchmarking, but not general aggregation. If there is a local nutrient analysis, yet an observation shows that "assumed" practices are not followed, then the nutrient analysis is not valid because it does not reflect what is actually happening. Also, if the SFAs are told by the USDA to use the "closest" data on the data base because a food cannot be found in the data base, then the data from any analysis is invalid.

10. Where are SFA-level records kept and in what format?

Records are kept in the state offices in hard copy format not at the field offices. Consultants maintain a copy of the review for later use. The analysis is included in the review.

11. When is the information sent to the state and by whom?

The information is sent to the state when the review is finished by the state consultant, usually by the end of the school year. There is a lot of back-and-forth with schools, especially if consultants cannot get all the information they need or if they suspect that data are not completely accurate. Sometimes, they may need to come up with a best guess when they do not have complete information. Every time they make a guess, they must prepare for inaccuracies. In any case, the data that the FNS receives will be inadequate for meaningful analysis.

12. How is the information sent to the state? Electronically? Hard copy? If electronically, please describe the protocols used. For example, is the information recorded on a diskette? Sent by e-mail? Other?

Information is sent as a hard copy from the field offices.

13. Where is the information kept and in what format? If applicable, please give a name and telephone number for the person who would have this information at the state level.

It is kept on hard copy at the state office.

14. Does the state do an independent nutrient analysis for SMI reviews, or does the state review existing analyses, or both? In which cases does the state do independent reviews? In which

cases does the state review nutrient analyses performed elsewhere? (Keep in mind that it is possible for the state to do both if it reviews nutrient analyses done by an SFA using a NuMenus or Assisted NuMenus system but does the actual nutrient analyses for SFAs using food-based systems.)

The state staff perform nutrient analyses for all SFAs using food-based systems. SFAs using nutrient-based systems are responsible for their own analyses. The state staff will sample items from their menus and do spot-checking, but they do not reanalyze the nutrient information.

15. At what point would it be best to have the nutrient analysis information sent to the FNS? From the state? From the reviewers themselves? Why?

In terms of transferring data from Nutrikids, data can be saved to a data file and sent to the FNS. There may be some validity to having a state-level database in the future, but such a database does not currently exist and funds are not available to commit to this.

16. Which of these steps, if any, would need to change in order to meet the FNS's goals for the selected data elements being sent in electronic format?

It would depend on the format that the FNS wants for the data. The FNS needs to give clear and simple guidelines for what it wants. The state staff do not want to have to do any programming in order to meet the reporting requirements.

17. It is possible that, in the future, the FNS may be able to negotiate with the companies that have created the nutrient analysis software to add a function where you would be able to create the report for the FNS right from the software. If that were to happen, what changes would you need to make to your current procedure?

It depends on what data elements the FNS is asking for. Additional information may have to be collected. Comparisons that are done without background information on what is really happening in the schools are not accurate, and this needs to be taken into account.

18. Which of the required data elements are currently missing from the software package you are using for your nutrient analyses?

Nutrikids contains only the nutrient analysis information. All other information would have to be added.

19. If the software companies do not agree to add this function, how will you incorporate the additional elements into an electronic report for the FNS?

The FNS must create a database into which the state can enter information. The data would then come in soft copy, which is preferred by the FNS. The state staff will use whatever system they are given as long as the FNS produces it and they can make it work. If the FNS gives simple instructions, they will use the system, but they will not do any programming to make it work. The FNS should have the responsibility for creating the program.

20. Do you think that there are any data elements that should be added to or deleted from the list to send to the FNS? If so, which items and why?

See notes with data elements.

21. Do you have any opinion on sending the information to the FNS electronically? Will this create any problems for your state?

Assuming that the FNS can come up with a format that could be easily used and easily read, there would be no problems.

22. How often do you think the states should have to report this information to the FNS? The FNS is required to prepare an annual strategic plan. Therefore, it is leaning toward annual collection of this information. Would this cause problems for your state?

Annually would be practical for reporting information to the FNS. Since some reviews are difficult to finish, this time frame would make more sense. On average, it takes a month to do a full review, but a few are open for many months before being completed.

23. Can you think of any alternatives for any of the processes we have discussed so far?

One alternative is to not do the SMI review at all because it is meaningless. The FNS should put its money into food service management training, which would help improve school nutrition more than collecting this type of data.

24. The FNS would like us to solicit comments from the state about this process. Do you have anything that you would like us to pass on to them?

It would make more sense to use the money that is going into this project to pay for training of school-level personnel. SFAs are mostly not ready to complete nutrient analyses because they don't have enough training and knowledge of what should be happening in the school lunch program. The SMI reviews are not helping the kids get a nutritious lunch.

#### **DATA ELEMENTS**

Georgia does not want to give names and contact information for anyone working on the reviews because, these staff members do not have time to answer questions from the FNS. Also, by the time the FNS looks at the data and gets back with questions, no one will remember what happened with a particular review. Some additional data elements that might be useful are locale codes to show whether the SFA is urban, rural, or mixed; the percentage of students eligible for free lunches and reduced prices; and the average number of items analyzed each day, to show how much choice the children get in the school.

**Date of Interview: July 13, 1999**

Name: Connie Stefkovich  
Agency: Nebraska Department of Education  
Title: Administrator—Nutrition Services

Name: Shawn Voudracek  
Agency: Nebraska Department of Education  
Title: Consultant—Nutrition Services

Name: Alisanne Ells  
Agency: Nebraska Department of Education  
Title: Consultant—Nutrition Services

Name: Mary Ann Brennan  
Agency: Nebraska Department of Education  
Title: Consultant—Nutrition Services

**BACKGROUND QUESTIONS**

1. How many SFAs are there in your state?

There are 506 SFAs; 32 are RCCIs.

2. How do you define an SFA? Is it a school district or something else?

SFAs are usually school districts. Private schools and RCCIs are usually their own SFA. Most of the SFAs in the state consist of only one school, and many of them have fewer than 100 students. One has only 16 students.

3. When did your state begin SMI reviews?

In 1996–1997.

4. Why did you start then as opposed to earlier or later?

The SFAs needed a starting place to know what changes to make to their systems. After the legislation was passed, SFAs started calling the state agency to find out what to do. Nebraska did not do on-site reviews for the first round. It only did nutrient analyses. This was to establish a baseline for each SFA and to draw attention to the process.

5. How many SMI reviews were completed in

1996–1997? 243 reviews (analysis only).

1997–1998? 147 reviews (analysis only).

1998–1999? 103 reviews (complete reviews).

6. How do you define a completed review?

A review is considered complete when all the steps in the process are finished. The steps are as follows:

1. A consultant at the state office calls the SFA several months ahead of time and asks for all pertinent information.
2. If the SFA uses a food-based system, it sends the information to a contractor.
3. The contractor performs the analyses for food-based SFAs; nutrient-based SFAs send in their own analyses.
4. The reviewer brings the analysis to the site visit.
5. The reviewer gives comments and asks for a corrective plan from the SFA.

7. When do you expect to complete the first round of SMI reviews?

In 2002–2003.

8. Do you think your state will need to make any changes in the future to process or staffing in order to complete the SMI reviews in five years?

No. Currently there are four reviewers at the state level, and the department contracts with four registered dietitians. Reviews are done on a one-on-one basis, where each reviewer works exclusively with one registered dietitian.

9. Are SMI reviews done in conjunction with CRE reviews?

Yes, they are done in conjunction with CRE reviews.

10. If you do SMI reviews in conjunction with the CRE, did you have to add staff to do this? What kind of training was involved?

Nebraska did not add staff to do the SMI reviews. The contractors doing the analyses had been with the state from the beginning. The contractors did the analyses for all schools not visited by state personnel during the first two years (1996–1997 and 1997–1998). Those two years were not counted in the five-year cycle because complete reviews were not done. Reviewers did not do any on-site visits during this time and the review was all done by mail. Starting in 1998–1999 reviewers visited every SFA.

11. Do your reviewers have access to e-mail?

Yes. All consultants have e-mail access.

12. Do your reviewers have access to the Internet?

Yes. All consultants have Internet access.

13. Is there any other software (e.g., MS Excel) that reviewers use for completing reviews? If so, what? Is the same software used at the state level and at the SFA level?

All contractors have Nutrikids. The contractors and consultants do not use any other software for the SMI reviews. An Access database with the nutrient analysis information is maintained by Connie Stefkovich.

14. How many people are involved in doing SMI reviews and analysis?

There are four consultants and four contractors working on the reviews, in addition to an overall administrator (nine people total).

15. Where are they located? For whom do they work?

Three of the reviewers and the administrator are located at the state office and one is in North Platte. The contractors are spread throughout the state.

16. What are each of their roles in the SMI reviews?

The contractors are responsible for conducting nutrient analyses on all SFAs using food-based systems. They also must collect all information from the SFAs that is necessary for performing the analyses. The consultants do the on-site visits and work with the schools to come up with correction plans.

17. Does the state agency have access to the nutrient analysis information?

Yes.

18. Do you feel that the SMI reviews are necessary to bring school meals into compliance with the Dietary Guidelines for Americans and the Recommended Daily Allowances?

Yes and no. The on-site visits required by SMI are very similar to the old system. The only part that is new is the process of analysis itself. The staff are not sure that the whole process is necessary or accurate. Since they do not see an SFA again for five years, there is really no way to make sure that corrections are being made or that nutrient content is maintained. The SFAs appreciate the importance of the review, and they would probably like to have the analysis done more often than every five years. Employees who have their performance reviewed only once every five years may have no idea how they are doing between reviews. The same is true of the SMI reviews. In addition, it is hardly fair to say that one week of menus and recipes reflects the meals served for five years. A better idea might be to compare the menus and recipes from the review week to menus for a typical month.

19. Do you think it would be difficult for the reviewers in this state to provide information to the FNS directly?

It would be difficult for both the SFAs (in cases with nutrient-based systems) and the contractors (in cases with food-based systems) to send information directly to the FNS. In addition, the state would not want these analyses sent directly to the FNS because the consultants must review them prior to making them public. Even the

SFAs do not see the analyses until the consultants review them. It would be much easier to send the information directly from the state database.

### **PROCESS IN THE STATE**

1. Who collects the raw information for nutrient analyses on food offered in any given SFA?

A State Agency (SA) consultant telephones the SFAs and sends a letter informing them that they need to send all necessary information (menus, recipes, labels, etc.) to the contractors if they use a food-based system, or they have to send a nutrient analysis to the consultant if they use a nutrient-based system. In either case, the food service manager is responsible for collecting the documentation for the analysis. If it is a food-based system, then the contractor is responsible for ensuring that the information is complete.

2. With what organization is this person employed?

The contractors are independent, and the food service managers work for the SFA.

3. In what format is the information collected? Does this format change over the course of the review? For example, if the initial information is collected on hard copy, is it ever converted to an electronic version?

Everything is collected in hard copy. None of it is converted into electronic format except the nutrient analysis itself.

4. Who performs the nutrient analysis of this information?

The contractors do nutrient analyses for the SFAs that use food-based systems and the food service managers at the SFAs do them for SFAs that use nutrient-based systems.

5. Are there any steps between the initial collection of information and the nutrient analysis? If so, what are they and who performs them?

The contractor may call the SFA with any questions regarding the information necessary to complete the analysis. For example, the contractor may need to go back to the SFA to get nutrient informa-

tion on a product. In some cases, usually at the beginning of the school year when there is no lead time for the review, the consultant may interview the manager first and then have her send the information for the nutrient analysis. This may also happen with RCCIs or in an SFA with a new food service manager, whom the consultant has to advise what to do.

6. Is the nutrient analysis ever revised after it is initially performed? If so, when and by whom? Where is the revision information recorded?

If an analysis comes to the consultant and she finds a problem with it, she will request to have it redone. Sometimes the problem is an error with inputting data and the contractor can correct it. Other times, someone has to go back to the SFA for additional information. The information from the revised analysis goes into the database.

7. How often are nutrient analyses usually revised?

Very rarely. Now that they are into the second round of reviews, the contractors and the food service managers seem to know what they are doing, so there is usually no need for revision.

8. Are data elements ever added or deleted from the information during this process?

No.

9. Is the information aggregated in some way other than at the state level? For example, at a district or regional level? If so, at what level?

A state average is calculated for all the nutrient items, but there is no other aggregation.

10. Where are SFA-level records kept and in what format?

The hard copies of the nutrient analyses are kept in files in the state office. Selected items from the information sent by the SFAs are kept at the state office as well. The rest is discarded. Electronic copies of the analyses are not kept past the end of the school year. While they are kept, the contractors have them on disk. The nutrient information is entered into an Access database at the state.

11. When is the information sent to the state and by whom?

The contractors send the hard copies of the analyses to the state as they are completed. They also send the disks with the electronic analyses at the end of the year, but the disks are erased after the information is no longer needed (usually at the end of the year).

12. How is the information sent to the state? Electronically? Hard copy? If electronically, please describe the protocols used. For example, is the information recorded on a diskette? Sent by e-mail? Other?

Hard copy and on diskette, but the electronic copy is not retained.

13. Where is the information kept and in what format? If applicable, please give a name and telephone number for the person who would have this information at the state level.

Hard copies, as well as the database with the nutrient information, are kept at the state offices.

14. Does the state do an independent nutrient analysis for SMI reviews, or does the state review existing analyses, or both? In which cases does the state do independent reviews? In which cases does the state review nutrient analyses performed elsewhere? (Keep in mind that it is possible for the state to do both if it reviews nutrient analyses done by an SFA using a NuMenus or Assisted NuMenus system but does the actual nutrient analyses for SFAs using food-based systems.)

The consultants at the state level review the analyses done by the contractors or the food service managers.

15. At what point would it be best to have the nutrient analysis information sent to the FNS? From the state? From the reviewers themselves? Why?

The best way would be to send the information from the database at the state level.

16. Which of these steps, if any, would need to change in order to meet the FNS's goals for the selected data elements being sent in electronic format?

The missing data elements would have to be added to the database.

17. It is possible that, in the future, the FNS may be able to negotiate with the companies that have created the nutrient analysis software to add a function where you would be able to create the report for the FNS right from the software. If that were to happen, what changes would you need to make to your current procedure?

The consultants at the state level have to check the analyses before they take them and their comments back to the SFAs. The state staff would not want the analyses to go directly from the food service managers or the contractors to the FNS. The contractors only know Nutrikids, and they are not really familiar with the rest of the process. They are not always able to tell whether something makes sense for a particular SFA, as the consultants can. The state would not want direct contact between the contractors and the FNS.

18. Which of the required data elements are currently missing from the software package you are using for your nutrient analyses?

Only the information directly from the nutrient analyses is currently in the database. Everything else would have to be added.

19. If the software companies do not agree to add this function, how will you incorporate the additional elements into an electronic report for the FNS?

The state will add them to the database.

20. Do you think that there are any data elements that should be added to or deleted from the list to send to the FNS? If so, which items and why?

See comments with data elements.

21. Do you have any opinion on sending the information to the FNS electronically? Will this create any problems for your state?

It should not be a problem to send information electronically to the FNS as long as it is willing to accept whatever format the data are in. The state staff do not want to have to worry about formatting the data in a specific way. They are mandated by an internal mandate from the database administrator at the Nebraska Department of Education to keep the data in an Access database. All databases must be the same so that they can be merged if necessary.

22. How often do you think the states should have to report this information to the FNS? The FNS is required to prepare an annual strategic plan. Therefore, it is leaning toward annual collection of this information. Would this cause problems for your state?

Nebraska would not want to send the information more often than annually, and the time of sending should be based on the school year, not the calendar year.

23. Can you think of any alternatives for any of the processes we have discussed so far?

Nebraska feels that it would be better to aggregate data by school size to send to the FNS. However, it would need a numerical size range that accounts for small schools. Because the state has not forced consolidation, it has some very small districts. There are only about 200,000 students in the whole state. Therefore, the definition of a small school has to account for schools that have only 100 or so students.

24. The FNS would like us to solicit comments from the state about this process. Do you have anything that you would like us to pass on to them?

The general reaction to this is that it creates more paperwork, even though FNS is asking for the information electronically. "Remember the paperwork reduction act." This project definitely adds to the workload for those doing SMI reviews, because many of the data elements are not being collected currently. The USDA wants to impose things that are logical for high-tech, high-population areas, but Nebraska is a low-tech, low-population area that will suffer if all of these data elements are deemed necessary. In addition, if the USDA were to mandate that states have to keep some sort of database, it could be very difficult for those that don't have one already. The staff in Nebraska is glad to be asked about this project, but they hope that the USDA will listen.

There are rumors going around that the USDA plans to tie reimbursement for lunches to meeting the nutrient standards in the future. The staff wanted to know if that was why it wants this information. If that happens, poor kids in Nebraska will suffer

because the schools will stop participating in the lunch program. They will still serve lunches, but they will no longer have free lunches available, and they will serve whatever they want. This would do more harm than good. There is still a lot of local control in Nebraska. Often, the school food manager cannot serve what he thinks the kids should have because the superintendent tells him what to serve.

## DATA ELEMENTS

There is currently a state database, but most of these data elements are not in it. Only the nutrient information is in it. As for the other elements, the Nebraska staff had a lot of comments. They would not want to give out the names of the contractors or the consultants to the FNS. The contractors are only paid to do the nutrient analysis, and they should not be contacted by the FNS. The consultants do not have time to answer questions. Therefore, if a contact person were absolutely necessary, the Administrator of Nutrition Services would serve as the contact for all analyses. However, if someone were to contact her a year after the fact about an analysis, she would not be able to clarify the matter, and the contractors and consultants probably couldn't either, because much of the backup material is not kept. In addition, the staff members feel that only the name and phone number of the person giving the information is really necessary here.

They said that they would absolutely refuse to give out the name of an SFA or even a code for an analysis, because the FNS can go through their files and easily find which SFA goes with which code. They are afraid that SFAs will get penalized for nutrient analyses that show that they are not meeting the standards. As for whether a plan of correction was needed or not, they don't keep track of this in the database. Each Nebraska Department of Education consultant tracks the corrective action and closes each SMI review. Whether corrective action is necessary or not should be obvious from the results of the analysis. If the SFA meets all the nutrient standards, there is no correction plan; if they don't, there is a correction plan.

As for the standards themselves, Nebraska personnel felt that it would be a waste of their time to list these for each analysis. If they give the FNS the type of meal plan used and the age and grade range, then the FNS will automatically have the standards—because the

standards were developed by the USDA in the first place. If absolutely necessary, they would willing to list the standards for the various meal plans used in the state once at the beginning of the report, but any more than that would create an unnecessary burden. Also, they wanted to know why the FNS doesn't seem interested in the standards for cholesterol, sodium, or fiber that the state has developed because those are the only types of standards that were not mandated by the USDA.

Finally, the dates seem unnecessary. They wanted to know why the FNS would be interested in knowing any of the dates for the analyses.

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Chapter Four  
**NEW JERSEY**

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**Date of Interview: August 10, 1999**

Name: Kathy Kuser  
Agency: Bureau of Child Nutrition Programs, New Jersey  
Department of Agriculture  
Title: State Director

Name: Barbara Guarnieri  
Agency: Bureau of Child Nutrition Programs, New Jersey  
Department of Agriculture  
Title: Program Development Specialist I—Public

Name: Joanne Lontz  
Agency: Bureau of Child Nutrition Programs, New Jersey  
Department of Agriculture  
Title: Program Development Specialist I—Nonpublic

Name: Jill Niglio  
Agency: Bureau of Child Nutrition Programs, New Jersey  
Department of Agriculture  
Title: Regional Coordinator—Central

In addition to the New Jersey Department of Agriculture, Bureau of Child Nutrition Programs staff, Matthew Sinn and Rosemary O'Connell from USDA, Food and Nutrition Service, also participated in this meeting.

**BACKGROUND QUESTIONS**

1. How many SFAs are there in your state?

There are 1,057 SFAs in New Jersey; 716 of them are in the NSLP (368 SFAs are under management company contracts).

2. How do you define an SFA? Is it a school district or something else?

An SFA can be a public school district, a private school, an RCCI, or a charter school.

3. When did your state begin SMI reviews?

In 1998–1999.

4. Why did you begin then as opposed to earlier or later?

The staff did one-on-one technical assistance on site with each of the SFAs during the 1997–1998 school year. They wanted to get the training done before starting the actual reviews.

5. How many SMI reviews were completed in

1996–1997? 0 reviews.

1997–1998? 0 reviews.

1998–1999? 100–125 reviews (some reviews are still coming in, so the number isn't final yet).

6. How do you define a completed review?

A completed review includes an on-site review, a nutrient analysis, an exit conference, a letter to the district, an improvement plan, and a closeout letter.

7. When do you expect to complete the first round of SMI reviews?

In 2002–2003.

8. Do you think your state will need to make any changes in the future to process or staffing in order to complete the SMI reviews in five years?

The state may change staffing in the future. It would like to hire a coordinator to do all the documentation and to help identify training needs. It is also looking to add field staff.

9. Are SMI reviews done in conjunction with CRE reviews?

The same person or team does both of them together. The CRE takes one day. The SMI takes at least one day but may take more if the information from the SFA is incomplete.

10. If you do SMI reviews in conjunction with the CRE, did you have to add staff to do this? What kind of training was involved?

There was no increase in money allocated with the increased workload of SMI. New Jersey used the USDA training as well as internal training. Staff learned a lot through trial and error.

11. Do your reviewers have access to e-mail?

No. Hopefully, they will within the next year.

12. Do your reviewers have access to the Internet?

No. Hopefully, they will within the next year.

13. Is there any other software (e.g., MS Excel) that reviewers use for completing reviews? If so, what? Is the same software used at the state level and at the SFA level?

All the reviewers have Nutrikids. The state has just ordered the Windows-based version of Nutrikids for everyone.

14. How many people are involved in doing SMI reviews and analysis?

There are seven field staff members and one central office person. New Jersey also contracts with an outside vendor in Ohio. The contractor has a lead dietitian and a data entry person.

15. Where are they located? For whom do they work?

The field staff and central office person all work for the Department of Agriculture, Bureau of Child Nutrition Programs. The field staff are in the office one day a week. The rest of the time, they are based out of their homes and are spread out around the state. They all have nutritional backgrounds, and one is an RD. The contractor that does the analyses is located in Ohio.

16. What are each of their roles in the SMI reviews?

The field staff do the site visits and technical assistance. They hand-carry all of the information back to the office to send to the contrac-

tor. The central office person is a clerical position. She logs all of the information in to show where a review is at a given time. She also tracks all the information coming from and going to the contractor. The contractor performs the analyses.

17. Does the state agency have access to the nutrient analysis information?

Yes.

18. Do you feel that the SMI reviews are necessary to bring school meals into compliance with the Dietary Guidelines for Americans and the Recommended Daily Allowances?

No. The most common problems are that the fat levels are too high or that there are too many calories. Nothing is way out of line. The reviews give child nutrition programs credibility, but the cost/benefit analysis doesn't work. The state could do more with the money that is currently going into the SMI. State staff should be training school food service people. Simple concepts are needed that the school food staff can understand—the nutrient analysis is too complicated. Also, it is often hard to get nutrient information from commercial vendors. If schools would just follow a meal pattern (especially an enhanced food-based program), they would serve nutritious meals.

Team Nutrition or getting parents more involved would be better than spending so much time and money on the SMI. An SFA would be foolish not to have nutritious food if it can, and most schools are really trying. SMI nutrient analyses are a paper exercise. They don't necessarily reflect reality.

19. Do you think it would be difficult for the reviewers in this state to provide information to the FNS directly?

New Jersey would rather have the information sent from the state agency. Because an outside contractor is doing the analyses, the state would want to have the opportunity to review the information before it was sent to the FNS.

## **PROCESS IN THE STATE**

1. Who collects the raw information for nutrient analyses on food offered in any given SFA?

The field staff collect the information. First, they conduct training for all SFAs that are going to be reviewed. The SFAs are told what information to have available, and they are given sample documents. The field staff members determine the review week and let the SFA know the date. They collect the backup information during the site visit.

2. With what organization is this person employed?

The reviewers all work for the Department of Agriculture.

3. In what format is the information collected? Does this format change over the course of the review? For example, if the initial information is collected on hard copy, is it ever converted to an electronic version?

Everything is on hard copy.

4. Who performs the nutrient analysis of this information?

The contractor in Ohio performs all nutrient analyses.

5. Are there any steps between the initial collection of information and the nutrient analysis? If so, what are they and who performs them?

During the site visit, the field staff and the SFA people do all the paperwork, so that they have all the menus, recipes, and production records for the analysis. That eliminates most of the need to go back to the SFA for more information, although additional information may be required later.

6. Is the nutrient analysis ever revised after it is initially performed? If so, when and by whom? Where is the revision information recorded?

If something is wrong with the analysis, staff will have to get more information from the SFA and redo it.

7. How often are nutrient analyses usually revised?

Rarely.

8. Are data elements ever added or deleted from the information during this process?

No.

9. Is the information aggregated in some way other than at the state level? For example, at a district or regional level? If so, at what level?

So far, there is no aggregation. The state would like to build some sort of database for use in aggregation, but it is waiting to see what FNS reporting mandates will be.

10. Where are SFA-level records kept and in what format?

They are all kept in the state office in Trenton. Everything is on hard copy.

11. When is the information sent to the state and by whom?

The contractor sends the analyses back to the state within 20 days of receiving the backup information. Usually, two or three analyses will be grouped together when they are sent back.

12. How is the information sent to the state? Electronically? Hard copy? If electronically, please describe the protocols used. For example, is the information recorded on a diskette? Sent by e-mail? Other?

Everything is sent to the state on hard copy.

13. Where is the information kept and in what format? If applicable, please give a name and telephone number for the person who would have this information at the state level.

Everything is kept at the state on hard copy. The department would like to keep things in electronic format but hasn't been able to so far because it had to make Y2K compliance a priority.

14. Does the state do an independent nutrient analysis for SMI reviews, or does the state review existing analyses, or both? In which cases does the state do independent reviews? In which cases does the state review nutrient analyses performed elsewhere? (Keep in mind that it is possible for the state to do both if it reviews nutrient analyses done by an SFA using a NuMenus or Assisted NuMenus system but does the actual nutrient analyses for SFAs using food-based systems.)

There are 23 SFAs in the state doing nutrient standard menu planning (NSMP), mostly using management companies, and one doing

assisted NSMP, also using a management company. The state reviews their analyses every year, whether or not they are selected for review. In review years, the NSMP schools have to submit the backup, but it is not sent to the contractor for a new analysis. For schools on other meal plans, the contractor does the analysis.

15. At what point would it be best to have the nutrient analysis information sent to the FNS? From the state? From the reviewers themselves? Why?

The information should come from the state because it is ultimately responsible. The FNS should provide the software to do the reports and the state staff will submit the necessary information. The state does not want to waste time capturing information that it doesn't need. The software should allow the state access to the data as well as give it a way to send the information to the FNS.

16. Which of these steps, if any, would need to change in order to meet the FNS's goals for the selected data elements being sent in electronic format?

Nothing would really need to change in the review process. The state collects what needs to be reported.

17. It is possible that, in the future, the FNS may be able to negotiate with the companies that have created the nutrient analysis software to add a function where you would be able to create the report for the FNS right from the software. If that were to happen, what changes would you need to make to your current procedure?

Information should still go through the state rather than directly from the contractor, so this would only be useful if the contractor could send the information to the state and the state could forward it to the FNS.

18. Which of the required data elements are currently missing from the software package you are using for your nutrient analyses?

Only the information directly from the nutrient analyses is currently in Nutrikids. Everything else would have to be added.

19. If the software companies do not agree to add this function, how will you incorporate the additional elements into an electronic report for the FNS?

The state wants a protocol from the FNS for doing the reports.

20. Do you think that there are any data elements that should be added to or deleted from the list to send to the FNS? If so, which items and why?

See comments with data elements.

21. Do you have any opinion on sending the information to the FNS electronically? Will this create any problems for your state?

It is no problem to report to the FNS electronically if the FNS provides a protocol for the required data elements. Otherwise, the state would have to create a method to do this.

22. How often do you think the states should have to report this information to the FNS? The FNS is required to prepare an annual strategic plan. Therefore, it is leaning toward annual collection of this information. Would this cause problems for your state?

If states have the software from the FNS and they are entering the information into the database regularly, they could send the information as often as the FNS wanted. Annually would be fine, but they could also do it quarterly or even monthly.

23. Can you think of any alternatives for any of the processes we have discussed so far?

No.

24. The FNS would like us to solicit comments from the state about this process. Do you have anything that you would like us to pass on to them?

There is an easier way to do this. The money should be put into programs such as the Deal-a-Meal program or Trimming the Fat. This would serve a better purpose than SMI monitoring. It is true that an SFA can't improve if it doesn't know what its baseline is. However, if an SFA had some sort of average profile of meals to follow, it would make more sense than SMI. It is still too early to see

anything in the SMI data. New Jersey will have more faith in the data after it has gone through the cycle once or twice. The FNS should try out the reporting with a few volunteers on an informal basis before requiring it of all states.

### **DATA ELEMENTS**

Based on comments from Matt Sinn, the group decided that the following data elements would be necessary for any report to the FNS:

1. Unique reference code
2. Contact person
3. Contact person's phone number
4. Type of SFA
5. Menu planning system used
6. Analyze lunch only or lunch and breakfast
7. Analysis weighted?
8. Lowest grade and age range
9. Highest grade and age range
10. Analysis done by grade or age range
11. Average daily number of lunches
12. Actual content from analysis software (11 nutrients)
13. Comments.

In addition, there would be space for some option items, such as name of the SFA. The contact person could be the state director for all analyses if that is what the state wanted. The standards could be given once for every age and grade range. New Jersey is already collecting all of this information, so it would not be a problem to report it if the FNS provided a protocol.

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Chapter Five  
**NEW YORK**

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**Date of Interview: August 9, 1999**

Name: Frances O'Donnell  
Agency: Child Nutrition Program Administration, New York State  
Education Department  
Title: Coordinator

Name: Linval Foster  
Agency: Child Nutrition Program Administration, New York State  
Education Department  
Title: Associate

Name: Debbie Favro  
Agency: Child Nutrition Program Administration, New York State  
Education Department  
Title: Assistant

Name: Sandy Sheedy  
Agency: Child Nutrition Program Administration, New York State  
Education Department  
Title: Nutrition Program Representative

**BACKGROUND QUESTIONS**

1. How many SFAs are there in your state?

There are about 1,275 SFAs, but the number is growing.

2. How do you define an SFA? Is it a school district or something else?

SFAs can be school districts, charter schools, private schools, RCCIs, county jails, group homes, yeshivas, etc. Based on a guidance memo from the USDA, the state is allowed to be more flexible with RCCIs on SMI reviews.

3. When did your state begin SMI reviews?

In 1998–1999.

4. Why did you begin then as opposed to earlier or later?

New York did some pilot testing in 1997–1998 but was not really ready to start the SMI until 1998–1999.

5. How many SMI reviews were completed in

1996–1997? 3 reviews (this was pilot testing only).

1997–1998? 107 reviews.

1998–1999? 90 reviews (there may be as many as 20 more that have not been logged in yet).

6. How do you define a completed review?

A review is complete when the analysis is finished, a correction plan is offered, and the review is filed at the state.

7. When do you expect to complete the first round of SMI reviews?

In 2002–2003.

8. Do you think your state will need to make any changes in the future to process or staffing in order to complete the SMI reviews in five years?

The state took on some summer feeding staff when the SMI began. The program is short-staffed—there are still six vacant positions, although these people will do more than just SMIs.

9. Are SMI reviews done in conjunction with CRE reviews?

It depends on the person doing the review, but usually they are done in conjunction with each other. However, they can't both be done on the same day.

10. If you do SMI reviews in conjunction with the CRE, did you have to add staff to do this? What kind of training was involved?

The state didn't add any staff. The task force that piloted the SMI worked out its own protocols. Staff are still at the "bottom of the learning curve" with training. They did have training for everyone on Nutrikids. The state also did a lot of training for the schools on NSMP. (Thirty-five percent of the SFAs in New York are on NSMP.) The analyses generally use weighted averages, although New York has a waiver to do unweighted analysis.

11. Do your reviewers have access to e-mail?

Yes. However, they only have access while in the office, not in the field.

12. Do your reviewers have access to the Internet?

Yes. This is the same as e-mail access.

13. Is there any other software (e.g., MS Excel) that reviewers use for completing reviews? If so, what? Is the same software used at the state level and at the SFA level?

Everyone has Nutrikids, but they really need software that they can use statewide in a networked manner. This is not possible with current versions of Nutrikids. The department is also going to an Oracle system, but this system will not include nutrient analysis information.

14. How many people are involved in doing SMI reviews and analysis?

There are 15 people doing reviews, and two people overseeing the process.

15. Where are they located? For whom do they work?

Three are in the Syracuse office, three are in the Buffalo office, and the rest are in the state office in Albany.

16. What are each of their roles in the SMI reviews?

The 15 reviewers all do site visits and nutrient analysis. The two people overseeing the process review the analyses before correction plans go to the schools.

17. Does the state agency have access to the nutrient analysis information?

Yes.

18. Do you feel that the SMI reviews are necessary to bring school meals into compliance with the Dietary Guidelines for Americans and the Recommended Daily Allowances?

Not really. The SFAs are offering good food, but the kids are not eating it. A lot of it goes in the trash. The nutrient analysis does not reflect reality. There is diversity in record keeping and collection. Also, the SMI doesn't account for food served à la carte.

Schools have been serving more salad bars and more pasta bars and less fattening foods. This is a result of training, not the SMI. You would probably get better results with more training. The time and money spent on the SMI could be better spent. As far as data go, "garbage in equals garbage out." There are lots of advocates in the schools for good nutrition, especially among the parents.

19. Do you think it would be difficult for the reviewers in this state to provide information to the FNS directly?

The state would be concerned about sending the information directly from the reviewers. The state is not sure that is necessary. The CRE is a composite; information on how each school is doing is not sent to the USDA. The FNS should only be getting aggregate data. The school-level data are not representative of how the school actually did. It would be a waste of time to give the FNS all the data. Looking at all the reviews together would be comparing apples to oranges.

## PROCESS IN THE STATE

1. Who collects the raw information for nutrient analyses on food offered in any given SFA?

The individual reviewers collect the information, but each one does it differently.

2. With what organization is this person employed?

They all work for the New York State Department of Education.

3. In what format is the information collected? Does this format change over the course of the review? For example, if the initial

information is collected on hard copy, is it ever converted to an electronic version?

Everything is on hard copy. Even schools on the NSMP print out the analyses for the state staff.

4. Who performs the nutrient analysis of this information?

The reviewers perform the nutrient analysis unless the school is on the NSMP. Then the SFA is responsible for the analysis.

5. Are there any steps between the initial collection of information and the nutrient analysis? If so, what are they and who performs them?

During the site visit, the reviewer observes the operation and does data collection. There may be some back-and-forth with the school if information is missing. Reviewers have contact with the schools for a couple months before the actual site visit so that they can educate the food service people ahead of time about what is expected. They run workshops that food service people from all SFAs are supposed to attend before the SMI review.

6. Is the nutrient analysis ever revised after it is initially performed? If so, when and by whom? Where is the revision information recorded?

Yes. Schools on NSMP usually reanalyze their data based on their correction plan. It is good public relations for the district to show how they are improving the meals the kids are eating. So far, the analyses the state reviewers perform have not been reanalyzed.

7. How often are nutrient analyses usually revised?

Only a couple analyses have been redone and sent in to the state so far. Some others may have been redone but not yet sent in.

8. Are data elements ever added or deleted from the information during this process?

No.

9. Is the information aggregated in some way other than at the state level? For example, at a district or regional level? If so, at what level?

The state hopes to aggregate the information in the future but has not completed its ACCESS database yet.

10. Where are SFA-level records kept and in what format?

The state office and the regional offices keep copies of review information. The backup information is kept in the regional office from which the review is performed.

11. When is the information sent to the state and by whom?

The correction letter goes to the state supervisors first for technical review and to keep the letters consistent. After the letter is approved, the analysis is sent to the state to be logged in. The SMI reviews are cross-checked with the CRE's to make sure that both have been done in each cycle.

12. How is the information sent to the state? Electronically? Hard copy? If electronically, please describe the protocols used. For example, is the information recorded on a diskette? Sent by e-mail? Other?

Some of the letters are sent by e-mail, some by fax. The analysis is sent on hard copy.

13. Where is the information kept and in what format? If applicable, please give a name and telephone number for the person who would have this information at the state level.

The analyses are kept on hard copy, and the summary is kept in electronic format.

14. Does the state do an independent nutrient analysis for SMI reviews, or does the state review existing analyses, or both? In which cases does the state do independent reviews? In which cases does the state review nutrient analyses performed elsewhere? (Keep in mind that it is possible for the state to do both if it reviews nutrient analyses done by an SFA using a NuMenus or Assisted NuMenus system but does the actual nutrient analyses for SFAs using food-based systems.)

For schools on the NSMP, the state staff reviews the analysis but does not redo it. For schools on food-based meal plans, the state staff perform the analysis.

15. At what point would it be best to have the nutrient analysis information sent to the FNS? From the state? From the reviewers themselves? Why?

The information should come from the state. That way, the state has internal control. The reviewers and the reviewees would be more comfortable if the information went through the state first.

16. Which of these steps, if any, would need to change in order to meet the FNS's goals for the selected data elements being sent in electronic format?

The FNS should standardize what it wants. Then it would receive the same kind of analysis from all those reporting—states, reviewers, and SFAs. New York will arrange to do whatever is mandated.

17. It is possible that, in the future, the FNS may be able to negotiate with the companies that have created the nutrient analysis software to add a function where you would be able to create the report for the FNS right from the software. If that were to happen, what changes would you need to make to your current procedure?

New York would have to compile the information from 15 different computers plus the schools on the NSMP before sending it to the FNS. Either the data should all come through the state or the state should not be responsible for schools on the NSMP.

18. Which of the required data elements are currently missing from the software package you are using for your nutrient analyses?

Only the information directly from the nutrient analyses is currently in Nutrikids. Everything else would have to be added.

19. If the software companies do not agree to add this function, how will you incorporate the additional elements into an electronic report for the FNS?

The state would want a computer program from the FNS for doing the reports.

20. Do you think that there are any data elements that should be added to or deleted from the list to send to the FNS? If so, which items and why?

See comments with data elements.

21. Do you have any opinion on sending the information to the FNS electronically? Will this create any problems for your state?

It is no problem to report to the FNS electronically if the state is provided with a protocol for the required data elements. Otherwise, the information can be sent directly from the new database, but that is not complete yet. The staff members are not sure that data collection is worth doing—SMI data are iffy at best.

22. How often do you think the states should have to report this information to the FNS? The FNS is required to prepare an annual strategic plan. Therefore, it is leaning toward annual collection of this information. Would this cause problems for your state?

Annually is fine. Reviews for a given school year are usually finished by November or December.

23. Can you think of any alternatives for any of the processes we have discussed so far?

It is not clear what the FNS is looking for here. However, the state believes that training, rather than nutrient analysis, is the place to start. State staff should first teach the food service people what they need to do to get the correct nutrients in the meal. Once they can do that, then the meal can be analyzed to see if it meets the standards.

24. The FNS would like us to solicit comments from the state about this process. Do you have anything that you would like us to pass on to them?

Sixty-seven percent of the 1.6 million kids who eat lunch in New York State schools each day are on free or reduced-price meals. Probably a vitamin pill would be better than doing the SMI as far as getting the kids their nutrients. Healthier meals could be promoted in a less cumbersome way. With the SMI, too much state money is going into entry of artificial data. It is very time consuming and stressful and not “the biggest bang for the buck.” New York spends \$600 million for reimbursement and the budget for the agency is only \$5 million. The FNS could get the information it wants with an added question or two on the CRE. There is a sense in New York (and probably in

other states as well) that the SMI is going to go away because there are better ways to do it. Nutritional integrity of the meals is important, but the SMI sends too many mixed messages. Instead of a full SMI, staff could spot-check using statistical sampling. Encouraging low-fat milk would definitely help.

Some analyses will have missing vendor information. However, staff then must convince the school that it needs a new vendor. It is important to have nutritional and fiscal integrity in the program.

#### **DATA ELEMENTS**

If the state is responsible for overseeing the child nutrition programs, why should the FNS want the SFA-level data? There is no reason to give a name and address for a contact person or the person doing the review. The FNS should not be contacting them. Questions should go through the state director. Right now the state does not collect the number of schools in the SFA as part of the SMI. The average daily number of lunches served should correspond to the question on the CRE, which asks for lunches in the SFA in a month. It seems unnecessary to give the FNS the standards since they come from the FNS in the first place.

**Date of Interview: August 5, 1999**

Name: John Perkins  
Agency: Texas Education Agency, Child Nutrition Programs  
Title: Director

Name: Debbie Owens  
Agency: Texas Education Agency, Child Nutrition Programs  
Title: Program Director for Compliance and Monitoring

**BACKGROUND QUESTIONS**

1. How many SFAs are there in your state?

There are about 1,100 SFAs, but that number will be closer to 1,200 when charter schools are added.

2. How do you define an SFA? Is it a school district or something else?

SFAs are either school districts or charter schools. The Texas Education Agency (TEA) is responsible only for public schools. The Department of Health Services is responsible for administering private schools, RCCIs, jails, etc.

3. When did your state begin SMI reviews?

In 1997–1998.

4. Why did you start then as opposed to earlier or later?

The TEA provided Nutrikids to all Educational Service Centers (ESCs) before the SMI started, therefore, many of them were already doing nutrient analyses prior to the official start of the SMI. In 1997–1998, SMI reviews were placed on the same cycle as the state CREs.

5. How many SMI reviews were completed in

1996–1997? Don't know.

1997–1998? Don't know.

1998–1999? Don't know.

6. How do you define a completed review?

The state agency does not get the information on completed reviews. The definition of a completed review will depend on the ESC doing the review.

7. When do you expect to complete the first round of SMI reviews?

In 2002–2003.

8. Do you think your state will need to make any changes in the future to process or staffing in order to complete the SMI reviews in five years?

The ESCs will be adding additional staff to handle the SMI. About ten people in ten different regions were hired for the SMI. How many people work on the SMI depends on the size of the region. Two people will do it in larger regions and only one in smaller regions. The state does not dictate how many they have.

9. Are SMI reviews done in conjunction with CRE reviews?

The SMI reviews are done in the same school year as the CRE, but not at the same time. The CRE is done from the state office in Austin, and the SMI is done by the ESC. The state office gives the ESC the list of SFAs that are getting a CRE that year. Texas has decided that the SMI is not to be considered official compliance monitoring, because it doesn't want the SFAs to fear it and consider it too much of a burden.

10. If you do SMI reviews in conjunction with the CRE, did you have to add staff to do this? What kind of training was involved?

Not applicable.

11. Do your reviewers have access to e-mail?

Yes.

12. Do your reviewers have access to the Internet?

Yes.

13. Is there any other software (e.g., MS Excel) that reviewers use for completing reviews? If so, what? Is the same software used at the state level and at the SFA level?

The state provided Nutrikids to all ESCs. However, because the ESCs are semi-independent entities, created by the legislature to provide assistance, they may all have different computer programs in addition to Nutrikids.

14. How many people are involved in doing SMI reviews and analysis?

There are about 25 people working on the SMI. However, it is difficult to give an exact number because the state agency does not mandate what the ESCs do. There is at least one person in each ESC working on the SMI, and some of the ESCs with bigger SFA loads have more than one person. Some ESCs contract out some parts of the SMI reviews.

15. Where are they located? For whom do they work?

They are located in the regional ESCs. Most of the people work for the ESCs, which are funded by the TEA. However, some ESCs contract out parts of the SMI or use nutrition students at nearby colleges. It depends entirely on the ESC.

16. What are each of their roles in the SMI reviews?

Each person's role in the SMI completely depends on the ESC.

17. Does the state agency have access to the nutrient analysis information?

Yes, but the state agency personnel get the nutrient analysis only if they ask for it. It is not usually sent to the state.

18. Do you feel that the SMI reviews are necessary to bring school meals into compliance with the Dietary Guidelines for Americans and the Recommended Daily Allowances?

No. The cost/benefit analysis of the SMI is not justified by the results of the program. Serving the required healthy meals and providing the nutritional background for the SMI reviews require expertise that many schools don't have. In Texas, 84 percent of schools are still on food-based meal plans, and the main reason for this is the nutrient analysis. Schools don't have the time or the expertise to complete these analyses. Seventy-five out of the 178 SFAs on NuMenus have contracts with food service management companies. The nutrient analysis requirement deters schools from trying innovative menus.

Also, doing these analyses is not an exact science. There are too many points along the way where the reviewer has to make a decision about what to enter. A set of practice-based menus would make more sense. The fat levels and calorie levels are the biggest problems. However, there are ways to get these levels down without the SMI. Within five years, 90 percent of meals in 90 percent of districts will probably comply with all nutrient requirements. However, 5 percent of districts will never make it.

Oklahoma did an experiment in which 12 people on 12 computers were given the same menus, recipes, and labels told to do nutrient analyses. They came up with 12 different analyses. This indicates a problem with the way analyses are done.

19. Do you think it would be difficult for the reviewers in this state to provide information to the FNS directly?

Yes. The reviewers and SMI information are located in 20 regional areas around the state. The data are not consolidated, and each ESC does the reviews differently. Texas does about 250 CREs per year, so the ESCs should be doing about the same number of SMI reviews. This is a huge amount of data to be sending to the FNS.

## **PROCESS IN THE STATE**

1. Who collects the raw information for nutrient analyses on food offered in any given SFA?

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It depends on the ESC, but the SFA has to provide the data to ESC staff or to a contract person.

2. With what organization is this person employed?

It depends on the ESC—either the school district, the ESC, or a contractor.

3. In what format is the information collected? Does this format change over the course of the review? For example, if the initial information is collected on hard copy, is it ever converted to an electronic version?

Everything is collected on hard copy.

4. Who performs the nutrient analysis of this information?

It depends on the ESC, but either the ESC staff or a contractor.

5. Are there any steps between the initial collection of information and the nutrient analysis? If so, what are they and who performs them?

It depends on the ESC, but, if additional information is needed to complete the analysis, the ESC or contractor will contact the SFA.

6. Is the nutrient analysis ever revised after it is initially performed? If so, when and by whom? Where is the revision information recorded?

It could be changed if a reviewer finds that actual information during the site visit is different from what was sent to the ESC.

7. How often are nutrient analyses usually revised?

They are revised as needed.

8. Are data elements ever added or deleted from the information during this process?

No. Clarification of the information may be obtained by the reviewer if there are questions, but items are not added or deleted.

9. Is the information aggregated in some way other than at the state level? For example, at a district or regional level? If so, at what level?

The information may be aggregated at a regional level by the ESC, but it is not aggregated at a state level. There are currently no plans to aggregate the data in any systematic way. The state does not really know what type of aggregation the ESCs are doing.

10. Where are SFA-level records kept and in what format?

The information should be kept on file by the district, including a copy of the analysis and the improvement plan. The ESC also keeps a copy.

11. When is the information sent to the state and by whom?

A recap that includes general information is sent to the state annually, but the individual nutrient analyses are never sent to the state. If the state got that information, it would feel obligated to do something with it, and it currently does not have the personnel for this. There would have to be some sort of mandate to force the ESCs to send the data to the state. Currently, the TEA only gets data required by state or federal law.

12. How is the information sent to the state? Electronically? Hard copy? If electronically, please describe the protocols used. For example, is the information recorded on a diskette? Sent by e-mail? Other?

The recap is sent on hard copy. No other data on SMI reviews are sent to the state.

13. Where is the information kept and in what format? If applicable, please give a name and telephone number for the person who would have this information at the state level.

Information that is sent to the state goes to the state nutritionist (Nancy Cise, 512-973-9760).

14. Does the state do an independent nutrient analysis for SMI reviews, or does the state review existing analyses, or both? In which cases does the state do independent reviews? In which cases does the state review nutrient analyses performed elsewhere? (Keep in mind that it is possible for the state to do both if it reviews nutrient analyses done by an SFA using a NuMenus or Assisted NuMenus system but does the actual nutrient analyses for SFAs using food-based systems.)

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It depends on the ESC, but ESCs will usually review analyses for SFAs that use NuMenus and perform analyses for SFAs that are on food-based systems.

15. At what point would it be best to have the nutrient analysis information sent to the FNS? From the state? From the reviewers themselves? Why?

The nutrient analysis should not be sent to the FNS. However, if doing so is mandated, then the state would have to coordinate the process, and it would be a huge effort. There is no way to say right now what would come from each ESC. The data will not be consistent, because they will come from different entities using different software. Also, data can be manipulated to say what you want them to say.

16. Which of these steps, if any, would need to change in order to meet FNS's goals for the selected data elements being sent in electronic format?

The analysis data would have to be coordinated through the state agency.

17. It is possible that, in the future, the FNS may be able to negotiate with the companies that have created the nutrient analysis software to add a function where you would be able to create the report for the FNS right from the software. If that were to happen, what changes would you need to make to your current procedure?

The nutrient analysis should not go directly to the USDA. The state would have to coordinate any data transfer. Since the state agency is ultimately responsible for what is sent to the FNS, it would want to review the analyses first.

18. Which of the required data elements are currently missing from the software package you are using for your nutrient analyses?

Nutrikids contains only the nutrient analysis information. All other information would have to be added.

19. If the software companies do not agree to add this function, how will you incorporate the additional elements into an electronic report for the FNS?

The TEA would have to meet with the computer people and figure out a way to do that. It would be a huge effort. Texas has a system for submitting reimbursable claims in electronic format, so it might be possible to piggyback on that system.

20. Do you think that there are any data elements that should be added to or deleted from the list to send to the FNS? If so, which items and why?

See comments with data elements.

21. Do you have any opinion on sending the information to FNS electronically? Will this create any problems for your state?

It will create problems because no system is currently in place to send the data to the state agency in the first place. Also, the amount of data that will come from Texas alone is huge. The FNS does not have the resources to deal with the amount of data it is asking for.

22. How often do you think the states should have to report this information to the FNS? The FNS is required to prepare an annual strategic plan. Therefore, it is leaning toward annual collection of this information. Would this cause problems for your state?

Texas will do whatever is legislated but would need enough time to pull everything together. The data should be sent no more often than annually.

23. Can you think of any alternatives for any of the processes we have discussed so far?

No.

24. The FNS would like us to solicit comments from the state about this process. Do you have anything that you would like us to pass on to them?

The SMI is a waste of valuable time and money. School meals can be brought into compliance with the guidelines without doing nutrient analyses. Having to report the results of the SMI moves into a compliance monitoring area that goes beyond the legislative and regulatory intent.

The SMI has a large impact on the schools, particularly the small ones. (In Texas, 50 percent of the students are in only 46 SFAs; the other 50 percent are spread over more than 1,000 SFAs.) The small SFAs feel that the SMI is “beyond them”—that they don’t have the education and expertise to complete it. This makes their personnel feel dumb or inferior. They need formal training rather than the SMI to help them understand purchasing, etc. Also, the information is unreliable. There is some question as to why we would do this kind of review on the meals served to healthy kids when hospitals don’t do it for sick kids.

Parents and children understand the food pyramid and want to work with that. They do not understand the nutrient guidelines, mostly because they are very hard to visualize. In addition, the nutrient analysis does not ensure that the kids are eating the foods that are being analyzed. Schools are taking the foods that kids like and making them à la carte, so that they are not included in the analysis. This polarizes the kids, because kids who get the free and reduced-price lunch are in the hot lunch line and the kids with lunch money are in the à la carte line. Also, outside agencies come in and set up food service à la carte in many schools. The nutrient analysis is a distorted view of what kids are eating. The SMI actually has had a negative effect on the food service people and on kids’ eating habits.

The strong Hispanic influence in Texas makes it hard to feed kids the foods they like. Most menu cycles do not have enough meals that these kids will eat. Also, there are a lot of kids who live in rural areas and go home to work on the farm. They need more calories than the average child, but this counts against the school in the nutrient analysis. Schools can be taught to serve healthy meals. If the state agency has a good relationship with the schools, they will comply. If The FNS went with the food pyramid instead of nutrient analysis, then everyone would understand. Also, this would be positive for the schools because it would show that the USDA was listening to them.

Finally, schools are putting more money into file cabinets than food with the SMI. This seems to go against the paperwork reduction act.

## **DATA ELEMENTS**

The state staff personnel are not sure how valid this data collection tool will be. The FNS will be collecting huge amounts of data for questions that someone may or may not ask. Collecting information just for the sake of having it is not worth the trouble. Also, this implies a universal process for collecting data, and that is impossible. Right now, staff are doing more data collection than training. In addition, releasing data on a specific school that was doing badly could create a public relations problem. It would also be a meaningless effort, since they cannot close down a kitchen if it does not meet the standards. The TEA is violently against coming up with a national average on the nutrient standards. It feels that the SMI puts an unreasonable burden on states, and now the FNS is trying to justify it.

As for the data elements, the TEA cannot really give a date the analysis was closed. It does not have standards for cholesterol, sodium, and fiber, so reporting them would be meaningless. It does not plan to develop standards for these items. The first review will be used as a baseline for future comparisons.

## **PROCESS IN TEXAS, REGION XIII, ESC**

Contacts:

Name: Rosa Winn

Title: Child Nutrition Specialist/Education Specialist

Name: Regina Abanathy

Title: Program Assistant

## **Process Questions**

1. Who collects the raw information for nutrient analyses on food offered in any given SFA?

The ESC staff collects the information. It is either sent by the school district before the site visit or collected at the visit.

2. With what organization is this person employed?

They work for the ESC.

3. In what format is the information collected? Does this format change over the course of the review? For example, if the initial information is collected on hard copy, is it ever converted to an electronic version?

Everything is collected on hard copy. Rural schools could not possibly do it any other way.

4. Who performs the nutrient analysis of this information?

The ESC staff.

5. Are there any steps between the initial collection of information and the nutrient analysis? If so, what are they and who performs them?

The standard policy is first to send a letter to the SFA saying that the SMI will happen soon and telling it what information will be required, then to send a second letter giving the dates for the review week and the date for the site visit. Schools usually comply, so no further action is taken before the analysis is performed.

6. Is the nutrient analysis ever revised after it is initially performed? If so, when and by whom? Where is the revision information recorded?

If there are problems, staff will look for the glitch. Last year (1998–1999) was the first year for doing the SMI, so all the materials are drafts. Sometimes things are not up to par—the information may not be accurate or the school may send in a different recipe from what it used. In these cases, the ESC will revise the analysis.

7. How often are nutrient analyses usually revised?

Almost all the analyses were revised last year. Sometimes revision is done on site. Time permitting, staff will go back to see if the school has improved. The analysis is really a living document. Most districts are not where they need to be and aren't using standardized preparation and production, even when their food service directors think that recipes are being followed. They must get their staff to understand that they need to follow recipes. This is a problem across the board with all sizes of SFAs.

8. Are data elements ever added or deleted from the information during this process?

No. Clarification of the information may be obtained by the reviewer if there are questions, but items are not added or deleted.

9. Is the information aggregated in some way other than at the state level? For example, at a district or regional level? If so, at what level?

The information has not been aggregated so far. The ESC does not have enough staff to do it. They would like to, but they don't have the secretarial help. They do not want to contract out any of the work, because they would lose control. The ESCs can't make things happen in the schools, though. They are supposed to give strictly technical assistance.

10. Where are SFA-level records kept and in what format?

The records are kept at the SFA and at the ESC. In a small district, ESC staff will work with someone in administration other than the food service director. They might talk to the superintendent. All superintendents receive a letter from the ESC about the SMI. This establishes a sense of importance about what they are doing. Some superintendents are interested in such things as grams of fat. Some don't care unless there is money involved.

11. When is the information sent to the state and by whom?

The information is not sent to the state.

12. How is the information sent to the state? Electronically? Hard copy? If electronically, please describe the protocols used. For example, is the information recorded on a diskette? Sent by e-mail? Other?

Not applicable.

13. Where is the information kept and in what format? If applicable, please give a name and telephone number for the person who would have this information at the state level.

It is kept at the SFA in hard copy and at the ESC on hard copy and electronically.

14. Does the state do an independent nutrient analysis for SMI reviews, or does the state review existing analyses, or both? In which cases does the state do independent reviews? In which cases does the state review nutrient analyses performed elsewhere? (Keep in mind that it is possible for the state to do both if it reviews nutrient analyses done by an SFA using a NuMenus or Assisted NuMenus system but does the actual nutrient analyses for SFAs using food-based systems.)

This ESC has 16 SFAs on NuMenus—most of them with management companies. It has more management companies than other regions. ESC staff redo all nutrient analyses for SFAs on NuMenus. The ESC also has 43 food-based SFAs, and ESC staff have to do analyses on those. It also does a precompliance CRE visit, which is separate from the SMI, for all SFAs before the TEA goes in—so there is plenty of work.

15. At what point would it be best to have the nutrient analysis information sent to the FNS? From the state? From the reviewers themselves? Why?

It would be fine to send it from the ESCs, because they are the ones who are familiar with it.

16. Which of these steps, if any, would need to change in order to meet the FNS's goals for the selected data elements being sent in electronic format?

It would depend on exactly what the FNS wanted. However, every analysis will be different. This is really comparing apples to oranges. The staff have a real concern about the value of this exercise. Some ESCs don't redo analyses for SFAs using NuMenus—this makes comparison even more problematic.

17. It is possible that, in the future, the FNS may be able to negotiate with the companies that have created the nutrient analysis software to add a function where you would be able to create the report for the FNS right from the software. If that were to happen, what changes would you need to make to your current procedure?

This would be putting money into the end of a process that should be put into the beginning. There is no infrastructure for doing the SMI,

and it is too early to aggregate the data. School food staff do not have the education and training necessary to complete the SMI. In addition, because school administrations do not recognize nutrition as part of the educational system, they don't want to have to teach children and parents about nutrition.

18. Which of the required data elements are currently missing from the software package you are using for your nutrient analyses?

Nutrikids contains only the nutrient analysis information. All other information would have to be added.

19. If the software companies do not agree to add this function, how will you incorporate the additional elements into an electronic report for the FNS?

The ESCs would need a program designed to tie everything together and give a summary.

20. Do you think that there are any data elements that should be added to or deleted from the list to send to the FNS? If so, which items and why?

See comments with data elements.

21. Do you have any opinion on sending the information to the FNS electronically? Will this create any problems for your state?

If the ESCs are given a program to use, it will be no problem—for what the data are worth.

22. How often do you think the states should have to report this information to the FNS? The FNS is required to prepare an annual strategic plan. Therefore, it is leaning toward annual collection of this information. Would this cause problems for your state?

Annually would be OK.

23. Can you think of any alternatives for any of the processes we have discussed so far?

No. If these data are collected, ESC staff would like to see comparisons by state with national norms. Calcium is a big problem in their area. If the data were released to the public, they don't see any pub-

lic relations problem. They have to be more concerned with the kids than the image of the school district.

24. The FNS would like us to solicit comments from the state about this process. Do you have anything that you would like us to pass on to them?

If SFAs aren't making the grade, then things need to change and a good shakeup is necessary. However, the SMI may not be the right way to do it. It is important to make sure that this reporting exercise will not be a waste of time. Right now, the SFAs are overwhelmed by paperwork. In addition, some food service people just don't understand what they need to do. They need grassroots training on using the food-buying guide and creating standardized menus. The ESCs have tried to create standardized menus, but it didn't work. For instance, a highly educated food service director in a rural area didn't want to use them because she wanted to serve her own food.

Also, the fact that healthy food is served doesn't mean that the kids are eating it. A lot of it ends up in the trash, and this is not taken into account with the SMI. There is a big difference between what is being served and what is being consumed. To effect change, the SFAs would need a mandated nutrition program for prekindergarten and up.

### **Data Elements**

The list seems pretty comprehensive, but the staff in all 20 ESCs in Texas would need training on how to collect the correct information for the FNS. The food service people would need to know exactly how to input each item. To be able to interpret the reports, the FNS would need to have background information on what menus and recipes, etc., went into the analysis. Such training would make the data somewhat valid, but they would still be open for interpretation.

Chapter Seven  

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**WISCONSIN**

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**Date of Interview: June 29, 1999**

Name: Julie Cox

Agency: Department of Public Instruction, Food and Nutrition  
Services

Title: Child Nutrition Program Consultant

Name: Carol Philipps

Agency: Department of Public Instruction, Food and Nutrition  
Services

Title: Program Coordinator

**BACKGROUND QUESTIONS**

1. How many SFAs are there in your state?

There are 900 SFAs; 44 are RCCIs.

2. How do you define an SFA? Is it a school district or something else?

An SFA is officially defined as the place where the school has a contract for food service. It is usually a school district. Private schools and RCCIs are usually their own SFAs.

3. When did your state begin SMI reviews?

In 1996–1997.

4. Why did you start then?

Wisconsin was able to get an early start on the SMI reviews because it had one school in the NSMP pilot (Viroqua School District). Therefore, the staff at the state agency had already had advanced training in the program. However, the reviews were a struggle at the beginning.

5. How many SMI reviews were completed in

1996–1997? 32 reviews.

1997–1998? 100 reviews.

1998–1999? 180 reviews.

6. How do you define a completed review?

The analysis is considered complete when a consultant has visited the school, all data have been collected and analyzed, a report has been delivered to the school, the school has a plan to correct any problems, and a closure letter has been sent.

7. When do you expect to complete the first round of SMI reviews?

In 2002–2003.

8. Do you think your state will need to make any changes in the future to process or staffing in order to complete the SMI reviews in five years?

Funding is a very large constraint, so there is no guarantee that the agency will be allowed additional positions even though they are necessary. There is one reviewer currently working half-time who is planning to retire at the end of the year. The agency hopes that the state will then fill this position with a full-time person. They continue to strive for ways of completing SMI/CRE reviews in the most timely manner given the shortage of consultants.

9. Are SMI reviews done in conjunction with CRE reviews?

Yes, they are done in conjunction with the CRE.

10. If you do SMI reviews in conjunction with the CRE, did you have to add staff to do this? What kind of training was involved?

The agency hired Julie Cox in 1997 to do the in-house analysis on the SMI reviews. When the SMI first started, one consultant was doing

the SMI reviews and Cox was performing the analyses. Now the consultants divide up the SFAs and do both CRE and SMI reviews and provide other technical assistance as needed to the SFA being reviewed. Past training provided for SMIs included Nutrikids regular and advanced training, and SMI Nutrition Review and Technical Assistance Training by USDA/FNS for State Agency staff. For state agency new hires, the training now includes working with Julie Cox on Nutrikids to learn nutrient analysis and going with consultants on SMI reviews. Consultants may team up in the future, with one of them doing the SMI and the other doing the CRE in the same SFA. However, this will not necessarily be done for all reviews.

11. Do your reviewers have access to e-mail?

Yes.

12. Do your reviewers have access to the Internet?

Yes. Consultants have access to e-mail and the Internet only when they are in the state offices. Their laptops have docking stations that they can use when they are in the office. They are on the road a majority of the time, so they are usually only able to access e-mail and the Internet once a week.

13. Is there any other software (e.g., MS Excel) that reviewers use for completing reviews? If so, what? Is the same software used at the state level and at the SFA level?

Yes. All consultants have Nutrikids, Word, and Excel on their laptops. Some may use Access if they have been trained on it, but not many do. The state agency has an Oracle database, and staff use Infomaker to access it. Nutrikids does have a networking capability, but the consultants do not currently use it.

14. How many people are involved in doing SMI reviews and analysis?

Nine people (eight full-time consultants, one half-time consultant).

15. Where are they located? For whom do they work?

All personnel working on the SMI are based at the state agency office in Madison, and they travel to the SFAs in the rest of the state. The Director of DPI-FNS is their supervisor.

16. What are each of their roles in the SMI reviews?

The consultants are responsible for seeing all parts of the analysis through. This includes data collection, data clarification, nutrient analysis, writing the report, negotiating an improvement plan, approving an SFA's plan to correct the problems, and sending out a closure letter. Julie Cox, a Madison-based consultant with no field responsibilities, does about half of the technical nutrient analyses as support for the field team. There is also a coordinator (Carol) who assists the reviewers with scheduling and compiles the CRE reviews.

17. Does the state agency have access to the nutrient analysis information?

Yes.

18. Do you feel that the SMI reviews are necessary to bring school meals into compliance with the Dietary Guidelines for Americans and the Recommended Daily Allowances?

Yes and no. The review represents only one week every five years for each SFA. Therefore, it is only a snapshot of what the food service in the SFA is like. Because it is only a snapshot in time, it is not completely representative of the SFA. It is possible that the review was done during a particularly good week for the SFA or that they changed their behavior because they were being monitored—so they seemed better than they actually were. On the other hand, it is also possible that the review came during a particularly bad week and did not show the true picture of food service in that SFA.

Nevertheless, staff personnel in Wisconsin feel that the reviews give something in black and white to look at for each SFA. Analyses sometimes show surprises. For instance, one SFA was serving milkshakes at every lunch and the reviewer thought the fat content would be very high. In reality, the SFA was doing quite well with fat. The reviews can reassure an SFA that it is doing well or allow it an opportunity to improve if it has problems.

Some state and regional staff personnel are a little apprehensive of data being sent to the FNS without knowing the purpose of this data collection. For example, will the data be used to fine schools eventually if they are not in compliance? How can data from different

states be grouped together and analyzed when different procedures are being followed.

19. Do you think it would be difficult for the reviewers in this state to provide information to the FNS directly?

Yes. If the software would make it an option to create the report, it would not be difficult for the reviewers to send results directly to FNS. However, if that does not happen, it would be better if Wisconsin could just send the Excel spreadsheet on which it compiles the analysis information.

#### **PROCESS IN THE STATE**

1. Who collects the raw information for nutrient analyses on food offered in any given SFA?

The consultants.

2. With what organization is this person employed?

The Wisconsin Department of Public Instruction, Food and Nutrition Services.

3. In what format is the information collected? Does this format change over the course of the review? For example, if the initial information is collected on hard copy, is it ever converted to an electronic version?

Everything (labels, menus, recipes) is collected on hard copy by the consultant visiting the SFA. Sometimes, the SFA has a review binder ready for the consultant. Other times, the SFA has envelopes of information that the consultant has to sort. Everything that the consultant collects is kept on hard copy at the state office for two years after the close of the review.

4. Who performs the nutrient analysis of this information?

The consultants in the field performed about 80 analyses in the 1998–1999 school year. Julie Cox performed the other 100 analyses.

5. Are there any steps between the initial collection of information and the nutrient analysis? If so, what are they and who performs them?

The consultants may need to go back to the SFA for clarification if certain pieces of information are missing (labels, recipes, etc.). This can be done by phone or fax. The consultant who visited the SFA usually does it. Julie Cox may also do this.

6. Is the nutrient analysis ever revised after it is initially performed? If so, when and by whom? Where is the revision information recorded?

The only time analyses are revised is if an SFA has done its own analysis, or a prereview analysis is done and there is reason to believe there was a mistake in the information used in the analysis. Analyses may also be revised if they show a problem based on the menus used, but the SFA has since made a change in its menus that would correct the problem. In this case, the first analysis is recorded, but the second one is kept in the SFA's file.

7. How often are nutrient analyses usually revised?

They are occasionally revised.

8. Are data elements ever added or deleted from the information during this process?

No. Clarification of the information may be obtained by the consultant if the agency has questions, but items are not usually added or deleted. If a consultant quits or retires, his or her name would be replaced with the name of the consultant who takes over. The average daily number of meals for the meal plan reviewed is not currently collected.

9. Is the information aggregated in some way other than at the state level? For example, at a district or regional level? If so, at what level?

The information is not aggregated at any level.

10. Where are SFA-level records kept and in what format?

Hard copies of the backup information (menus, labels, etc.) are kept in a file for each SFA at the state agency. An electronic copy of each nutrient analysis is kept in Nutrikids on the computer of the consultant who performed it. In addition, hard copies of the analyses are kept in the SFA's file (a separate file from the backup information).

The information from each analysis is also entered into an Excel spreadsheet that Julie Cox maintains.

11. When is the information sent to the state and by whom?

The reviewers are all based at the state agency, so all analyses are kept there. Hard copies are filed there, and the information is entered into the Excel spreadsheet.

12. How is the information sent to the state? Electronically? Hard copy? If electronically, please describe the protocols used. For example, is the information recorded on a diskette? Sent by e-mail? Other?

Everything is sent to the state on hard copy.

13. Where is the information kept and in what format? If applicable, please give a name and telephone number for the person who would have this information at the state level.

Nutrikids analyses are kept on individual consultants' computers and on hard copy at the state agency. The Excel spreadsheet is maintained by Julie Cox.

14. Does the state do an independent nutrient analysis for SMI reviews, or does the state review existing analyses, or both? In which cases does the state do independent reviews? In which cases does the state review nutrient analyses performed elsewhere? (Keep in mind that it is possible for the state to do both if it reviews nutrient analyses done by an SFA using a NuMenus or Assisted NuMenus system but does the actual nutrient analyses for SFAs using food-based systems.)

If an SFA is using NuMenus or Assisted NuMenus, then the consultant will check the analysis done by the SFA. The consultant does not rerun the analysis unless it is unclear what the SFA did to arrive at the given results. However, the SFAs using the NuMenus systems are still learning how to use Nutrikids and run analyses, so there are often mistakes. State staff personnel run classes in nutrient analysis during the summer for SFAs that need to perform their own analyses. Nutrient analyses for SFAs using food-based menu systems are done by one of the consultants in the field or by Julie Cox at the state agency.

15. At what point would it be best to have the nutrient analysis information sent to the FNS? From the state? From the reviewers themselves? Why?

Currently, it would be easiest for Wisconsin if the FNS would accept the Excel spreadsheet containing the nutrient analysis information for all SFAs reviewed in that year. However, if it is possible to add a function to the software that would allow reviewers to send the information directly to the FNS, that would be preferable.

16. Which of these steps, if any, would need to change in order to meet the FNS's goals for the selected data elements being sent in electronic format?

The only change would be to add the data items that are currently not in the Excel spreadsheet.

17. It is possible that, in the future, the FNS may be able to negotiate with the companies that have created the nutrient analysis software to add a function where you would be able to create the report for the FNS right from the software. If that were to happen, what changes would you need to make to your current procedure?

Probably none. However, there might be some problems with sending the reviews directly from the software if they were done by the SFA. The consultants need to review them first.

18. Which of the required data elements are currently missing from the software package you are using for your nutrient analyses?

The software only has qualitative and quantitative elements that must be calculated, standards for the quantitative elements, dates for the review week, and age and grade range. However, the dates for the review week are not always accurate. Nutrikids only allows a user to enter 26 menus for a given week. The first week of school is very popular for collecting menus, so Julie Cox often has more than 26 for that week. She then changes the dates for some of them and does the calculations but adds a note to indicate what the date actually was.

19. If the software companies do not agree to add this function, how will you incorporate the additional elements into an electronic report for the FNS?

The state will add them to the spreadsheet. However, the spreadsheet option *necessitates* rekeying all information, so it would be preferable to have the option on the software.

20. Do you think that there are any data elements that should be added to or deleted from the list to send to the FNS? If so, which items and why?

The state staff would like the USDA to add an element to capture the county the SFA is in as well as space for an additional grouping code. In Wisconsin, this grouping code field would be used to indicate the Cooperative Educational Service Agency (CESA) that the SFA is in. Other states may find this useful as well (Texas has ESAs, and New York has Boards of Cooperative Educational Services). This way, the state could do individual analyses by county or other grouping. It would also be useful to indicate whether the SFA is public or private, who did the review, who did the analysis, and the date the results were sent to the SFA. They also think that the date of on-site visit, date of analysis, date results were sent to the SFA, date that school responded, and date of the SMI closure would be useful.

21. Do you have any opinion on sending the information to the FNS electronically? Will this create any problems for your state?

It should not be a problem.

22. How often do you think the states should have to report this information to the FNS? The FNS is required to prepare an annual strategic plan. Therefore, it is leaning toward annual collection of this information. Would this cause problems for your state?

Annually would be preferable. It would also be preferable if the data were required in January of the following year or later. The analyses are often not finished when school is out in June. Usually the analysis takes an additional six months to complete. If there were an option in the software, then real-time reporting, as the analyses were completed, would be fine.

23. Can you think of any alternatives for any of the processes we have discussed so far?

Each of the options discussed would be acceptable to the state staff: sending the information directly from the software, sending it in the Excel spreadsheet, or sending it over the Web. However, the last two options would require rekeying the information. The Web site idea would be useful to the staff only if the FNS could send the information back to the state so that it would not have to be rekeyed.

24. The FNS would like us to solicit comments from the state about this process. Do you have anything that you would like us to pass on to them?

If the state has to provide the FNS with data in some format other than the Excel spreadsheet, the staff would like to know if there would be some way that the FNS could send the information back to them. Otherwise, the consultants would have to key the data in twice.

## DATA ELEMENTS

The Wisconsin staff suggested adding:

- Public or private school
- Who performed the review
- Who performed the analysis
- Date that results were sent to the SFA
- County
- Other grouping (CESA)
- Number of schools in the SFA.

The staff also had a question about SFAs for which they are unable to complete nutrient analyses. They wanted to know if the FNS would want the nutrient analysis information left blank, or whether the FNS would not want any report on those SFAs. This does not happen very often, but it does happen occasionally.