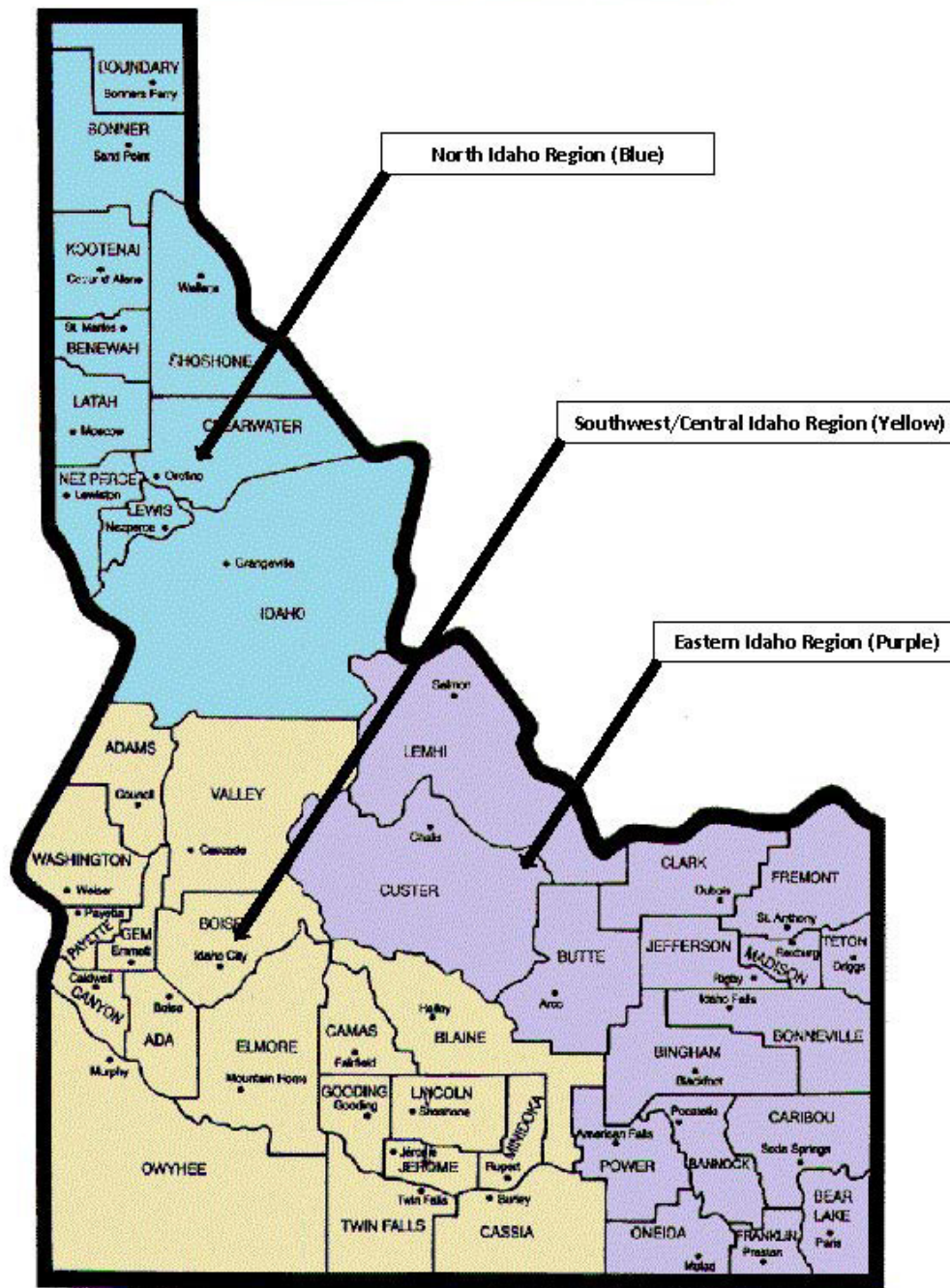


Exhibit A CNP Regional Map

Child Nutrition Programs Regional Map



Meal Compliance Nutrition Review Guide

This guide, along with the most recent *Meal Compliance Nutrition Review Tool* (currently SY18-19) (Exhibit 1), provides instructions and guidance for completing a Meal Compliance Nutrition Review of an Idaho School Food Authority (SFA) for the Idaho State Department of Education, Child Nutrition Programs (SDE).

Website links for program regulations, policy memos and most review resources referenced in this guide can be found on the last page of the guide. Resources not available via website links are provided as exhibits at the end of the guide.

All information presented in this guide is current as of the date noted. The United States Department of Agriculture (USDA), Food and Nutrition Service (FNS) may issue more guidance or further clarification at any time. The Contractor must follow the most current guidance provided by USDA.

INTRODUCTION

The meal pattern is the foundation of federal school nutrition programs. The Contractor shall ensure SFAs are offering reimbursable meals at breakfast and lunch according to the USDA regulations. SFAs operating the National School Lunch Program (NSLP) and/or the School Breakfast Program (SBP) must follow meal pattern requirements for each age/grade group within all reimbursable meal service lines. Meals claimed for reimbursement must contain the appropriate meal components and quantities for the SBP, NSLP and the CACFP (7 CFR 210.10, 220.8, 226.20).

The purpose of the Meal Compliance Nutrition Review is to ensure that schools operating the NSLP and/or SBP prepare, offer, and serve meals to students that meet the meal pattern requirements for the appropriate age/grade groups on all reimbursable meal service lines. Additionally, every reimbursable meal service line must meet the daily and weekly meal pattern requirements for the appropriate age/grade group served. This includes verifying how an SFA is meeting the meal pattern requirements if serving multiple age/grade groups, in a single location, and if school age children are using self-service stations.

MEAL COMPLIANCE NUTRITION REVIEW MODULES OF THE USDA NSLP ADMINISTRATIVE REVIEW

The Meal Compliance Nutrition Review consists of three modules, the Meal Components and Quantities Module, the Dietary Specifications and Nutrient Analysis Module, and the Infant and Pre-k Meal Pattern Checklist. This guide provides instruction for conducting and completing the modules for a single site review and a multi-site review.

Each Meal Compliance Nutrition Review must be completed and delivered via email to the SDE lead reviewer at least ten working days before the SDE administrative review team conducts their on-site portion of the administrative review.

SINGLE SITE REVIEW VERSUS MULTI-SITE REVIEW

Depending on the size of the SFA, the SDE will determine whether the Meal Compliance Nutrition Review will be a single site review, or a multi-site review.

For smaller SFAs, a single site is selected by the SDE for a single site review. The site selected is the targeted site that receives the Meal Compliance Nutrition Review where the Meal Components and Quantities Module, the Dietary Specifications and Nutrient Analysis Module, and the and the Infant and Pre-K Meal Pattern Checklist are completed.

For larger SFAs, the SDE must conduct a multi-site review. For a multi-site review, the SDE selects several sites for review and determines one site to be the targeted site. The targeted site receives the same review as the single site (Single Site Review), where the Meal Components and Quantities Module, the Dietary Specifications and Nutrient Analysis Module, and the and the Infant and Pre-K Meal Pattern Checklist are completed. For each additional site selected for review by the SDE, the Off-Site Procedure of the Meal Components and Quantities Module must be completed.

For each Meal Compliance Nutrition Review, the SDE shall provide the Contractor with the following information via work order:

- a. SFA's name and contact information
- b. Targeted site for review (identified by SDE as low risk or high risk)
- c. Targeted site *Dietary Specifications Assessment Tool* (with Off-Site portion completed by SFA) (Attachment 2, Exhibit 5)
- d. SFA's previous administrative review closure letter
- e. List of additional sites to review, if applicable
- f. Review period (review month) and menu review week within the review period (subject to change in consultation with the SDE lead reviewer due to inclement weather or unforeseen circumstances with the SFA, such as illness, no scheduled meal service, etc.)
- g. Date(s) SDE administrative review team will be on-site
- h. SDE lead reviewer contact information

SINGLE SITE REVIEW

MEAL COMPONENTS AND QUANTITIES MODULE

Off-Site Procedure

1. Complete *USDA Meal Certification of Compliance Worksheet*

In a single site review, the site selected is the targeted site. The SDE selects the review period (review month) and determines the menu review week within the review period.

Prior to the on-site visit, the Contractor must complete a *USDA Meal Certification of Compliance Worksheet* for each age/grade group represented in the targeted site selected for review.

The Contractor must complete a *USDA Meal Certification of Compliance Worksheet* for all age/grade groups for breakfast and lunch. The worksheet should be completed off-site using production records, menus, recipes, food receipts, manufacturer's product formulation statements (PFS), CN labels, and any other records to document that meals served by the SFA during the menu review week contained the required components and quantities.

The Contractor should grant the SFA sufficient time (about 2 weeks) to gather and return the requested documentation to the Contractor for review prior to the scheduled on-site visit. For efficiency, the Contractor should review the same menus, production records, and standardized recipes for both the *Meal Components and Quantities Module* and the *Dietary Specifications and Nutrient Analysis Module* as part of the Administrative Review. If the Contractor needs more information to better understand usual practices at the site, in conjunction with SDE advice, the Contractor may choose to examine additional weeks within the review period.

There is a distinct *USDA Meal Certification of Compliance Worksheet* for each age/grade group, and there are separate menus for breakfast and lunch. Therefore, the Contractor must complete a *USDA Meal Certification of Compliance Worksheet* and review menus and production records for each menu type and age/grade group in the targeted site for both breakfast and lunch. For example, if a K-8 school serves two lunch menus (one for grades K-5, and one for grades 6-8) and two breakfast menus (again, one for each age/grade group), the Contractor would need to complete four *USDA Meal Certification of Compliance Worksheets* (two for lunch and two for breakfast) for that school.

The *USDA Meal Certification of Compliance Worksheet* is available on the USDA website. Because the *USDA Meal Certification of Compliance Worksheet* does not assess offerings by meal service line, the Contractor also must review menus and production records to

ensure that all required meal components are available on each reimbursable meal service line.

The Contractor or SFA is not required to complete the Simplified Nutrient Assessment portion of the *USDA Meal Certification of Compliance Worksheet*.

A list of commercially available, USDA-approved alternatives to the *USDA Meal Certification of Compliance Worksheet* is available on the USDE website. The Contractor may use one of these USDA-approved alternatives.

When reviewing a Residential Child Care Institution (RCCI), regardless of the students' actual grade levels, the 9-12 age/grade group meal pattern may be served to all students. *Policy Memorandum Extending Flexibility for RCCIs in the NSLP* (SP 48-2013)

Schools serving breakfast and lunch to children ages 1 through 4 (preschool) under SBP and NSLP, must serve the meal components and quantities required in the breakfast and lunch meal patterns established for CACFP (7 CFR 226.20) unless those children are co-mingled with grades K-5. These requirements are outlined in Policy Memorandums: *Flexibility for Co-Mingled Preschool Meals: Questions and Answers* (SP 37-2017) and *Updated Infant and Preschool Meal Patterns in the NSLP and SBP Questions and Answers* (SP 01-2018).

2. Gather Supporting Documentation

The Contractor must obtain documentation from the SFA, including menus, production records, USDA Foods Information Sheets, and related materials (e.g., CN Labels, standardized recipes, PFSS, etc.) for the site menu review week selected by the SDE.

SFAs must also provide supporting documentation for modified meals served to students with disabilities when the modifications do not meet the Program meal pattern requirements. Such meals are only eligible for federal reimbursement when supported by a medical statement signed by a state licensed healthcare professional (in Idaho, state licensed healthcare professionals are Medical Doctors (MD), Doctors of Osteopathy (DO), Naturopathic Medical Doctor (NMD), Physician Assistants (PA), Nurse Practitioners (NP) and Dentists (DDS)). The requirements for the medical statement are outlined in Memorandums: *Policy Memorandum on Modifications to Accommodate Disabilities in the School Meal Programs* (SP 59-2016) and *Statements Supporting Accommodations for Children with Disabilities in the Child Nutrition Programs* (SP 32 CACFP 13 SFSP 15-2015). (For sample CNP Medical Statement Form see Exhibit 2.)

3. Reviewing Documentation

The completion of the *USDA Meal Certification of Compliance Worksheet* and review of documentation is intended to establish the SFA's compliance with meal component and

food quantity requirements for each age/grade group served. This documentation review is in addition to the meal observation procedures conducted on the day of the on-site review (see On-Site Review Procedures).

When conducting a review of documentation for the targeted site menu review week, the minimum number of school days in the week to be reviewed is three (3), and the maximum is seven (7). All must be consecutive days. The Contractor may examine any food crediting documentation that is provided to the Contractor — including, but not limited to, food labels, USDA Foods Information Sheets, PFSs, CN labels, and bid documentation — to ensure meal pattern compliance.

The Contractor may also consult the USDA *Food Buying Guide* (FBG). Foods listed in the FBG are not required to have a CN Label or a PFS. The information in the FBG may be used to document how a food item credits. The SFA should document and provide the Contractor a copy of the FBG information that was used to determine the crediting.

If an SFA provides a CN label for crediting of meal components and quantities, the Contractor must not request additional crediting information such as a PFS. However, a CN Label may only provide information on how the product contributes towards meal pattern requirements, but may not provide nutrient information. Therefore, the Contractor may need to request nutrient information, separately from a CN label, for the nutrient analysis in other areas of the review.

Note: CN Labels copied with a watermark may also be used to document meal components and quantities. The watermarked CN Label must be attached to the Bill of Lading or invoice to show proof of purchase. For additional guidance please refer to Memorandum, *Administrative Review Process Regarding the Child Nutrition (CN) Label, Watermarked CN Label and Manufacturer's Product Formulation Statement* (SP27-2015; CACFP09-2015; SFSP12-2015).

SFAs are required to document how foods offered credit toward meal pattern requirements. If the Contractor finds foods that do not have a CN label, USDA Foods Information Sheet, or PFS, the Contractor should use their best judgment to determine if a required component is missing or present in insufficient quantity. For example, a site may not have documentation for a ham sandwich pocket, but the Contractor may be able to discern that the food item contains meat and grains. In this case, the meat and grains components are offered (i.e., not missing), but the quantities are unknown and therefore could result in insufficient quantities. If documentation is not available the Contractor must provide technical assistance and require corrective action, which may include ensuring that documentation requirements are met in order to confirm

that all items are creditable.

The Contractor must evaluate production records to ensure the following:

- a. Records included all information necessary to support the claiming of reimbursable meals (i.e., all menu items are listed and all required meal components are offered);
- b. Records are used for proper planning (e.g., evaluate for consumption and leftovers);
- c. Records documenting food prepared is creditable for the total number of reimbursable meals offered and served;
- d. Records document a la carte, adult, and/or other non-reimbursable meals, including number of portions for each of these food items;
- e. Records document that milk, whole grain-rich, and vegetable sub-group requirements are met;
- f. Records document weekly quantity requirements for grains, meat/meat alternative, vegetables, fruit, and milk;
- g. Records align with standardized recipes (e.g., if chicken salad sandwich is on the menu but mayonnaise is not listed on the production records, the Contractor may examine standardized recipes for additional information); and
- h. As needed, records to support meal modification outside the Program meal pattern for students with disabilities. Such meals are only eligible for reimbursement when supported by a medical statement signed by a state licensed healthcare professional.

If reviewing documentation or completing the *USDA Meal Certification of Compliance Worksheet* reveals problems with meal components or quantities, the Contractor should determine if the issue is systemic, or just a one-time occurrence. A systemic problem is a serious problem resulting from factors that are built into the SFA's processes and would likely recur if the processes are not changed. If the contributing factors are unusual, not part of the normal operating procedures, and the SFA's processes do not require changes to achieve accurate results, then the problem is non-systemic. If the issue is systemic, the Contractor must expand the review of production records to, at a minimum, the entire month selected by the SDE for the site(s) where systemic issues were identified.

On-Site Procedure (Day of Review)

The Contractor must contact the SFA and schedule an on-site review of the targeted site. The on-site review must be scheduled early enough so that the entire Meal Compliance Nutrition Review is completed and delivered via email to the SDE lead reviewer at least ten working

days before the SDE is scheduled to conduct their on-site portion of the Administrative Review.

The Contractor must conduct an on-site assessment of the SFA's meal service for breakfast and lunch to determine whether meals claimed for reimbursement contain the required components and quantities. The Contractor must:

1. Conduct a visual observation of meal service lines and review menu documentation the day the Contractor is at the scheduled on-site review and complete the applicable sections of the *Meal Compliance Nutrition Review Tool*.
2. If not fully completed off-site, complete a *USDA Meal Certification of Compliance Worksheet* and review menus and production records for the targeted site for the state-agency-determined menu review week.
3. Ensure that signage is posted and students know how to select a reimbursable meal; this aims to reduce the unintended purchase of a la carte items and help students make healthy food choices.

As part of the on-site review, the following steps must be completed:

Step 1: Review of Documentation (if not conducted off-site)

Refer to Off-Site Review Procedures above.

Step 2: Observation of the Meal Service

Prior to the beginning of the meal service, the Contractor must ensure, through on-site observation and a review of documentation, that all reimbursable meal service lines offer all of the required meal components and food quantities for the age/grade groups being served, including any Pre-K service

If multiple age/grade groups are being served in the same service area, the Contractor must determine how the meal service is structured to meet meal pattern requirements for each age/grade group.

Additionally, if visual observation suggests that quantities offered are insufficient, the Contractor must require the reviewed sites to provide documentation demonstrating that the required amounts of each component were available for service for each day of the review period.

To the extent possible, the Contractor must also observe the majority of meal preparation for breakfast and lunch to ensure that standardized recipes are followed (e.g., ingredients are added in amounts specified in the recipe, measurements are being taken appropriately) and safe food handling procedures are followed.

During the meal service, the Contractor must observe a significant number of program meals (breakfast and lunch) at the point-of-service on every reimbursable meal service line. The Contractor should observe 5 to 25 percent of meals served (this range takes into consideration differing types of meal services found in SFAs) on each reimbursable meal service line. The intent is for all reimbursable meal service lines in all meal periods to be reviewed if possible. The Contractor must observe meals at the beginning, middle, and end of the meal service.

During observation, the Contractor must determine whether the meals selected by students contain the required components or items and the food quantities required for the age/grade group being served as the students exit the meal service line at the point-of-service. If using self-service stations, the Contractor must verify that students have access to all required meal components, offered in the appropriate food quantities, for the appropriate age/grade groups. When reviewing self-service stations, the Contractor should observe students as they move through the self-service stations and ensure that they demonstrate knowledge of how to access all required meal components in the meal service area. If multiple lines are serving the same menu, only one line must be validated. However, the Contractor should spot check all lines for consistency.

When observing meals served in alternate locations (e.g., classroom, in-school suspension, multiple cottages within an RCCI), the Contractor must select an appropriate number of meals to observe to sufficiently assess the program meals served. To determine the sufficient number of meals to observe, the Contractor must consider several factors, such as the number of alternate meal service areas; number of reviewers; number of meals served; and length of time needed to properly observe the meal service, including Offer versus Serve (OVS) and Family Style Meal options. If a Contractor observes egregious violations at one alternate location, the Contractor must contact the SDE lead reviewer with these concerns so the SDE can review additional alternate locations. For more information on OVS, see Memorandum, *Updated Offer versus Serve Guidance for the National School Lunch Program and School Breakfast Program Effective Beginning School Year 2015-2016* (SP 41-2015). For more information on Family Style Meals see Memorandum *Updated Infant and Preschool Meal Patterns in the NSLP and SBP Questions and Answers* (SP 01-2018).

Please note that students with disabilities may require meal components and quantities that differ from the Program meal patterns. These meals are only eligible for reimbursement when the modification is supported by a medical statement signed by a state licensed healthcare professional. For more information, see Memorandum, *Policy Memorandum on Modifications to Accommodate Disabilities in the School Meal Programs* (SP 59-2016).

If the Contractor identifies missing meal components or inadequate quantities prior to the beginning of the meal service, **the Contractor must inform the SFA staff immediately of the violation and provide an opportunity to make corrections to ensure the minimum meal pattern requirements are met.** The priority is always to ensure students receive a nutritionally-balanced, reimbursable meal. Even if corrected prior to meal service, the Contractor must document the problem in the Comments section (Question 400) of the *Meal Compliance Nutrition Review Tool*. The Contractor must also report the violation to the SDE lead reviewer.

Step 3: The Contractor must answer the appropriate questions on the *Meal Compliance Nutrition Review Tool*, which focuses on whether meals contained the required components and quantities.

Milk Requirements

The Contractor must ensure that at least two choices of fluid milk from the following list are offered throughout the meal service on all reimbursable meal service lines for breakfast and lunch: flavored or unflavored fat-free milk, low-fat (1%) milk, fat-free or low-fat lactose-reduced milk, fat-free or low-fat lactose-free milk, fat-free or low-fat buttermilk, and fat-free or low-fat acidified milk. Students must be allowed to choose milk from at least two milk varieties, even in alternate meal service locations (e.g. breakfast in the classroom). If any milk substitutions are made for non-disability reasons, in order for the meals to be eligible for federal reimbursement, the Contractor must ensure the substitutions meet FNS nutrient requirements, as outlined at 7 CFR 210.10(d)(3). Because the Nutrition Facts Label may not list all of the required nutrients, the SFA may need to request documentation from the product manufacturer to confirm the presence of all required nutrients at the proper levels, and must maintain this documentation for review. For additional information, refer to 7 CFR 210.10(d) and 7 CFR 210.10(m); FNS Instruction 783-7, *Milk Requirement-Child Nutrition Programs* (revised, issued January 24, 1995) (Exhibit 3); and FNS Memorandum SP 07-2010, Q and As: *Milk Substitutions for Children with Medical or Special Dietary Needs (Non-Disability)*, issued November 12, 2009.

The nutrient requirements for fluid milk substitutions do not apply to cases of disability. SFAs will receive reimbursement for meals that substitute fluid milk products that do not meet the nutrient requirements, provided the substitution is supported by a written medical statement signed by a state licensed healthcare professional. See FNS Memorandum SP 59-2016, *Policy Memorandum on Modifications to Accommodate Disabilities in the School Meal Programs* and FNS Memorandum SP 32-2015, *Statements Supporting Accommodations for Children with Disabilities in the Child Nutrition Programs*.

SFAs are not to promote or offer water or any other beverage as an alternative selection to

fluid milk throughout the food service area. Signs describing the reimbursable meal must convey that milk is offered as a food component in a reimbursable meal and not as a beverage choice. However, potable water must be available free of charge during the meal service. This can be accomplished by an accessible, functional drinking fountain or water cooler with cups set up for meal service.

Milk variety is not required for Pre-K students following the CACFP meal pattern. When not comingled, children 2 through 5 years old may only be served either unflavored low-fat (1 percent) or unflavored fat-free (skim) milk.

When reviewing an RCCI, two varieties of milk must be served over a one-week period of time; two varieties do not need to be available every day. For example, 1% plain milk could be served Monday through Friday and fat-free chocolate milk served on Saturday and Sunday.

Fruit or Vegetable Juice Requirement

Fruit and/or vegetable juice (100% juice) may be used to meet up to half of the fruit or vegetable requirement over a week. For additional information, see FNS Memorandum SP 05-2022, *Meal Requirements Under the National School Lunch Program and School Breakfast Program: Questions and Answers for Program operators Updated to Support the Transitional Standards for Milk, Whole Grains, and Sodium Effective July 1, 2022*.

Vegetable Subgroup and Whole Grain-Rich Requirements

The Contractor must ensure that, over the course of the school week, meals offered to students meet the vegetable subgroup and whole grain-rich requirements specified in 7 CFR 210.10. This includes ensuring that required amounts of whole grain-rich foods are offered and, for the NSLP, determining that grain-based desserts are limited to no more than 2 oz. eq. per week.

For additional information on whole grain-rich requirements, the Contractor should reference FNS Memorandum SP 30-2012, *Grain Requirements for the National School Lunch Program and School Breakfast Program* and the *Whole Grain Resource for the National School Lunch and School Breakfast Programs* (2022)

Menu Substitutions

SFAs are encouraged to consider cultural, religious, and ethical preferences when planning and preparing meals. Accommodating student preferences helps to maintain participation in the NSLP and SBP. Variations, whether on an experimental or continuing basis, must be consistent with the food and nutrition requirements specified in Program regulations (7 CFR 210.10 and 7 CFR 220.8) in order for the meals to be eligible for reimbursement. If any substitutions are made from the planned menu for the day of review or the menu review week within the review period, the Contractor must validate whether the daily/weekly meal pattern requirements are met.

Accommodations for Children with Disabilities

SFAs must comply with USDA regulations regarding nondiscrimination at 7 CFR Parts 15, 15a, and 15b. This includes ensuring children with disabilities have an equal opportunity to benefit from the NSLP and SBP. Certain physical or mental impairments require meal modifications that do not follow the required Program meal pattern. Meal modifications outside the meal pattern

are reimbursable, provided the request is supported by a medical statement signed by a state licensed healthcare professional. If a meal modification for a child's disability can be made within the meal pattern requirements, FNS does not require a medical statement. See FNS Memorandums SP 59-2016 *Modifications to Accommodate Disabilities in the School Meal Programs* 26-2017 *Accommodating Disabilities in the School Meal Programs: Guidance and Questions and Answers*, and SP 40-2017 *Accommodating Children with Disabilities in the School Meal Program* (2017 edition) for more information.

Pre-K Meal Pattern

When reviewing the PK meal pattern, the Contractor should refer to 7 CFR 226.20 Requirement for meals. For more information, reference CACFP 08-2017 *Questions and Answers on the Updated Meal Pattern Requirements for the Child and Adult Care Food Program*. Additional memos to reference regarding Pre-K participation at schools include SP01-2018 *Updated Infant and Preschool Meal Patterns in the National School Lunch Program and School Breakfast Program: Questions and Answers* and SP37-2017 *Flexibility for Co-Mingled Preschool Meals: Questions and Answers*

Family Style Meal Service

When reviewing a family style meal service, the Contractor should refer to procedures outlined in FNS Memorandums: SP 35-2011, *Clarification on the Use of Offer versus Serve (OVS) and Family Style Meal Service* and FNS Instruction 783-9, rev 2, *Family Style Meal Service in the Child and Adult Care Food Program* (Exhibit 4).

Field Trips

The Contractor must review and evaluate field trip meals if served on the day of review and the menu review week within the review period. Field trip menus must meet daily and weekly meal component and quantity requirements. Refer to FNS Instruction 786-8, rev 1, *Reimbursement for Off-Site Meal Consumption* (Exhibit 5).

Traditional Foods

The Contractor may encounter the service of traditional foods during the Meal Compliance Nutrition Review, such as native whole blue corn kernel, bison, venison, or sheep. If a food is served as part of a reimbursable meal, but not listed in the Food Buying Guide (FBG), the yield information of a similar food or in-house yield may be used to determine the contribution towards meal pattern requirements. When this is the case, traditional foods may credit similar to products found in the FBG. FNS Memorandum TA 01-2015, *Child Nutrition Programs and Traditional Foods*, provides guidance on how to credit traditional foods towards meal pattern requirements.

Step 4: Recording Errors

The Contractor must report meals missing components and meals that do not meet quantity requirements to the SDE as follows:

Missing Meal Components:

Errors related to missing meal components are reported on the *Meal Compliance Nutrition Review Tool*, Questions 400 – 401 (day of review) and Questions 409 and 411 (review period).

Insufficient Quantities and Incomplete Meals:

Meals that do not meet quantity requirements are recorded on the *Meal Compliance Nutrition Review Tool*, Questions 402 – 403 and 407 (day of review) and Question 410 (review period).

Meals that contain insufficient quantities of meal components are considered incomplete. The SDE lead reviewer will provide the Contractor the SFA's previous administrative review closure letter which includes technical assistance and findings that were documented in the previous administrative review which are now considered to be repeat violations.

When multiple meal pattern violations are identified for a meal, list all violations in the appropriate Comments section of the *Meal Compliance Nutrition Review Tool*. If multiple violations include meals offered that are missing meal components, record the meal under the *Meal Compliance Nutrition Review Tool* missing meal component category (Questions 400-401 (day of review) and Questions 409 and 411 (review period)). For all other multiple meal pattern error violations, record repeated vegetable subgroup or milk type violations *before* all other violations. For these violations, use discretion and record the most egregious violations in the Comments section of the *Meal Compliance Nutrition Review Tool*.

Step 5: Provide Technical Assistance and Correction Action

All technical assistance and corrective action given to the SFA must be recorded in the appropriate sections of the *Meal Compliance Nutrition Review Tool*. Explanation must be clearly stated and documented.

When the Contractor conducts a Meal Compliance Nutrition Review and finds that the SFA is not meeting meal pattern requirements, technical assistance and corrective action must be taken. The Contractor and SFA must develop a written Corrective Action Plan with specific steps and reasonable timelines for bringing the SFA into compliance. The Corrective Action Plan will vary depending on the nature of the changes necessary.

The Contractor must require immediate corrective action for any missing meal components found during an on-site observation on the day of review, or found while examining *USDA Meal Certification of Compliance Worksheet* and/or reviewing menu documentation for the menu review week.

The site must immediately add the missing meal component(s) before any additional meals are claimed for reimbursement on: 1) the day of review, or 2) on future days on which the deficient menu is offered. In addition to immediate corrective action, the Contractor must require written corrective action from the SFA to ensure such violations do not occur in the future.

For missing meal components identified from examining the *USDA Meal Certification of Compliance Worksheet* and/or reviewing menu documentation, if the SFA wishes to provide documentation (e.g., invoices, food inventory tracking) to demonstrate that the missing meal component was actually offered, the Contractor must direct the SFA to the SDE lead reviewer.

In addition, the Contractor must require corrective action from the SFA for violations related to vegetable subgroups, milk types, whole grain-rich foods, and food quantities to help bring the SFA into compliance with the meal pattern requirements. This includes both violations observed on the day of review and those identified from the review of production records and completing the *USDA Meal Certification of Compliance Worksheet*. The Contractor must provide written documentation of the corrective action to the SDE lead reviewer. Record corrective action documentation in the *Meal Compliance Nutrition Review Tool* (Questions 403 and 409).

When production records are incomplete, **the Contractor must provide targeted technical assistance** to emphasize the importance of complete and accurate production records. The Contractor should ensure that the SFA understands the deficiencies and steps that must be taken to make sure that production records are complete and accurate. Technical assistance must be recorded on the *Meal Compliance Nutrition Review Tool* (Questions 409 and 410).

When errors are found in SFAs with central/satellite kitchens and/or district-wide menus the Contractor must provide technical assistance to ensure the SFA corrects the problem at all affected sites. The rationale for this is that, even though meals were prepared in a single location, the errors affect all meals served throughout the SFA. This same rationale would apply to menus implemented district-wide.

When errors are found in SFAs with central/satellite kitchens and/or district-wide menus, the Contractor must assess corrective action for all sites, reviewed and non-reviewed, in which the non-reimbursable meals were served. The rationale for this is that, even though meals were prepared in a single location, the non-reimbursable meals were served throughout the SFA.

Missing Meal Components

The Contractor must immediately inform the SDE lead reviewer when a meal component is

missing and record violations on the *Meal Compliance Nutrition Review Tool* for both the day of review (Question 401) and review period (Question 409).

Missing Production Records

SFAs are required to maintain documentation that demonstrates how meals offered to students meet meal pattern requirements. SFAs are required to document that reimbursable meals are offered. The Contractor must immediately notify the SDE lead reviewer if production records are missing. The Contractor must also provide training and technical assistance for noncompliant SFAs in proper production recordkeeping practices. This approach should ensure that missing production records are not a recurring issue. Document training and technical assistance on the *Meal Compliance Nutrition Review Tool* (Question 409).

Vegetable Subgroups and/or Milk Type Findings

For repeated violations involving vegetable subgroups and/or milk type cited in 7 CFR 210.18(g)(2), the SDE must take fiscal action. If the Contractor observes this violation, they must immediately contact the SDE lead reviewer and record the violations on the *Meal Compliance Nutrition Review Tool* (Questions 403 and Question 409).

Quantities and/or Whole Grain-Rich Findings

For repeated violations involving food quantities and/or whole grain-rich foods cited in 7 CFR 210.18 (g)(2), the SDE has discretion to apply fiscal action. The SDE has discretion to disallow/reclaim meals containing insufficient quantities of required meal components. If the Contractor observes this violation, they must immediately contact the SDE lead reviewer. The Contractor must record the violations on the *Meal Compliance Nutrition Review Tool* (Questions 403 and 409).

Performance-Based Certification Funding (8 cents)

If the Meal Compliance Nutrition Review finds that significant noncompliance exists, requiring the SFA to develop and implement a Corrective Action Plan over an extended period of time (i.e., problems cannot be fixed immediately), the Contractor must immediately contact the SDE lead reviewer.

DIETARY SPECIFICATIONS AND NUTRIENT ANALYSIS MODULE

Intent and Scope of Monitoring

The *Dietary Specifications and Nutrient Analysis Module* of the Meal Compliance Nutrition Review details procedures to assess whether meals offered to children through the school meal programs are consistent with federal standards (dietary specifications) for calories, saturated fat, sodium, and trans-fat (7 CFR 210.10 (f) and 7 CFR 220.8(f)). The Contractor must ensure

SFAs are offering meals that meet regulatory requirements.

Please note that infant and pre-k meals following the Child and Adult Care Food Program (CACFP) meal pattern are not included in the dietary specifications and a weighted nutrient analysis is not required.

The Contractor must assess compliance with meal components and quantities requirements by completing *the USDA Meal Certification of Compliance Worksheet(s)* in the *Meal Components and Quantities Module* before completing the *Dietary Specifications and Nutrient Analysis Module*.

Risk Determination

Step 1: The SDE Determines the Targeted Site

The targeted site will receive an on-site review from the Contractor and will require the completion of the *Dietary Specifications Assessment Tool*. The SDE lead reviewer will communicate to the Contractor which site is the targeted site.

The Contractor must conduct a targeted menu review, in accordance with one of the options described in Step 2, for the targeted site.

Step 2: Determining the Targeted Menu Review Approach and Conducting the Review

The Contractor has discretion to select one of two options for the targeted menu review of the targeted site. Option 1 and Option 2 procedures are outlined below.

Each option is distinct and the Contractor must adopt one option in its entirety (i.e., the Contractor cannot combine facets of different options to complete the review).

The Contractor must take into consideration compliance with meal pattern requirements in selecting which targeted menu review option to use. Noncompliance with meal pattern requirements at the targeted site, as determined by the completion of the *Meal Components and Quantities Module*, indicates high-risk for noncompliance with dietary specifications.

In the case of noncompliance with meal pattern requirements, the SFA should be offered technical assistance. The Contractor should determine if findings of noncompliance are systemic or non-systemic. Systemic findings indicate high risk for continued noncompliance and the Contractor must conduct a weighted nutrient analysis (Option 2). For non-systemic findings, the Contractor has discretion to conduct a weighted nutrient analysis (Option 2) or

follow the risk-based approach (Option 1). A weighted nutrient analysis would be conducted after the SFA implements corrective action to come into compliance with the meal component and quantity requirements. However, non-systemic findings may still require technical assistance, corrective action, and/or fiscal action.

Summary of Targeted Menu Review Options

Option 1: Complete *Dietary Specifications Assessment Tool* (Risk Based Approach) (Exhibit 6)

- a. Review the SFA completed off-site portion of *Dietary Specifications Assessment Tool*
- b. Conduct on-site review and complete on-site portion of *Dietary Specifications Assessment Tool*
 - i. If low risk determination supported, complete *Meal Compliance Nutrition Review Tool* (Questions 603 and 604)
 - ii. If low-risk determination not supported, proceed to Option 2

Option 2: Complete Weighted Nutrient Analysis

- a. Completed Weighted Nutrient Analysis off-site
- b. Conduct on-site review and complete on-site portion of *Dietary Specifications Assessment Tool*
- c. Complete *Meal Compliance Nutrition Review Tool* (Questions 603 and 605)

Dietary Specifications Assessment Tool

The *Dietary Specifications Assessment Tool* captures information about operational and menu planning practices and enables the Contractor to further examine the site's compliance with the meal pattern requirements for the SBP and NSLP.

The *Dietary Specifications Assessment Tool* contains off-site and on-site review elements. Contractors that elect the risk-based approach (Option 1) to assess compliance with dietary specifications must review the SFA's answers to the Tool off-site; however, the on-site portion of the Tool must be completed for both Targeted Menu Review options. The Tool is intended to evaluate specific food service practices for breakfast and lunch to determine the level of risk for not meeting the dietary specifications regulatory requirements. When electing to conduct a weighted nutrient analysis (Option 2), the Contractor may disregard the risk determination indicated by the tool and continue to follow the procedures for conducting a weighted nutrient analysis. However, the Contractor should provide technical assistance to address any areas of concern identified by the Tool. It is important to note that not all of the questions associated

with the Tool are intended to imply that the related activity is prohibited; rather, they reflect the possibility of a need for further review.

Option 1 Procedure

Complete the Dietary Specifications Assessment Tool

The SFA completes the off-site portion of the *Dietary Specifications Assessment Tool*.

The SDE will provide the Contractor the SFA completed portion of the *Dietary Specifications Assessment Tool*. Responses by the SFA to the off-site portion of the *Dietary Specifications Assessment Tool* determine whether the targeted site is low-risk or high-risk for noncompliance with dietary specifications regulatory requirements.

The Contractor shall follow on-site procedures that correspond with the low-risk or high-risk determination.

If the targeted site is low risk, the Contractor must verify compliance during the on-site review using the on-site portion of the *Dietary Specifications Assessment Tool* and follow the appropriate on-site procedures based on the risk determination indicated. A weighted nutrient analysis is not required if the on-site review confirms low risk determination.

If during the on-site review, the targeted site is determined to be high risk, the Contractor must complete a weighted nutrient analysis for both breakfast and lunch (if applicable) using USDA-approved software and complete the high-risk on-site review procedures.

On-Site Review Procedure (Day of Review)

Procedure for Low Risk Sites

If the off-site portion of the *Dietary Specifications Assessment Tool* indicates the targeted site is low-risk, the Contractor must validate the low-risk status through:

1. Observation of the meal preparation and meal service, and completion of the on-site portion of the *Dietary Specification Assessment Tool* (this will help identify areas where the Contractor can provide targeted technical assistance) and respond to Questions 603 – 605 of the *Meal Compliance Nutrition Review Tool*.
2. Review of food storage on the day of the review to check labels.
3. Evaluation of menus, production records, standardized recipes, and any other documentation that supports the meals offered.

When validating low-risk status during the on-site review, the Contractor may encounter the following situations:

On-Site Observation Supports Low-Risk Status

A weighted nutrient analysis is not required. However, even low-risk sites will likely be able to

improve menu practices and meal quality. The Contractor must provide technical assistance to address any areas of concern identified by the *Dietary Specifications Assessment Tool*. Any technical assistance provided must be recorded on Question 603 of the *Meal Compliance Nutrition Review Tool*. Contractors also have discretion to request corrective action. When technical assistance and corrective action (if applicable) are complete, the targeted menu review is also complete.

NOTE: The Contractor has the discretion to conduct a weighted nutrient analysis upon prior approval from SDE and is encouraged to do so if it has concerns about the SFA's food service practices.

On-Site Observation Does Not Support Low-Risk Status

If the on-site portion of the *Dietary Specifications Assessment Tool* determines the targeted site to be high risk based on observation and supporting documentation, the Contractor must conduct a weighted nutrient analysis for breakfast and lunch following the *High-Risk On-Site Review Procedures* described below.

On-Site Observation Does Not Support Low-Risk Status and Severe Noncompliance Identified

If the Contractor identifies severe noncompliance, the site will automatically be categorized as high risk. The Contractor may use discretion when determining "severe noncompliance" based on their observations. Severe noncompliance could be, but is not limited to, any of the following findings:

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

Severe noncompliance includes one or more practices observed on-site that could indicate violations of the dietary specifications. The Contractor must determine the severity of noncompliance. If those practices put the site at risk for violating dietary specifications requirements, the Contractor must proceed to Option 2 and conduct a weighted nutrient analysis for breakfast and lunch.

Procedure for High-Risk Sites

Follow Option 2 Procedure.

Option 2 Procedure

Conduct Weighted Nutrient Analysis

Off-Site Review Procedures

If the Contractor chooses Option 2, the Contractor must conduct a weighted nutrient analysis using USDA-approved nutrient analysis software. The Contractor is encouraged to begin conducting weighted nutrient analysis activities (e.g., collecting menu documentation, data entry) prior to the on-site review, but it is not required. Completing some, or all, of this work in advance allows for more time on-site to provide targeted technical assistance.

The Contractor must use and complete the Nutrient Analysis Checklist, which provides a detailed checklist for conducting a weighted nutrient analysis. The Contractor must request at least one week of menu documentation for breakfast and lunch to conduct the weighted nutrient analysis, including, but not limited to:

1. Menus
2. Production records (detailing what was offered to students)
3. Standardized recipes
4. Nutrition information
5. Information about how the products contribute toward meal pattern requirements (often in the form of a CN Label or a PFS, but not both)
6. As needed, medical statements (signed by a state licensed healthcare professional) supporting meal modifications for students with disabilities, when modifications do not meet the Program meal pattern requirements

The Contractor should grant the SFA sufficient time (2 weeks) to gather and return the requested documentation to the Contractor for review prior to the scheduled on-site visit.

The nutrient analyses for breakfast and lunch must be conducted on each menu type offered to each age/grade group in the targeted site only. The Contractor must follow the nutrient analysis protocols as detailed in FNS's *Nutrient Analysis Protocols: How to Analyze Menus for USDA's School Meals Programs*.

On-Site Review Procedures (Day of Review)

During the on-site portion of the Meal Compliance Nutrition Review, the Contractor will have the opportunity to examine menu documentation with the SFA and clarify any questions.

The Contractor must complete the *Dietary Specifications Assessment Tool* on-site as this will help identify areas where the Contractor can provide targeted technical assistance and respond to questions 603-605 of the *Meal Compliance Nutrition Review Tool*. The Contractor must request corrective action as appropriate.

The weighted nutrient analysis must be complete in order for the SDE to close the

Administrative Review. If the Contractor is unable to complete the weighted nutrient analysis before the SDE sends the Administrative Review Report to the SFA, the SDE must advise the SFA that the review will remain open until the weighted nutrient analysis is complete. If the completion of the weighted nutrient analysis is delayed at any time during the review, the Contractor must be in continuous written contact with the SFA and the SDE lead reviewer.

For detailed instructions on conducting a weighted nutrient analysis using USDA-approved software, refer to the FNS's *Nutrient Analysis Protocols: How to Analyze Menus for USDA's School Meals Programs*.

Note: USDA finalized meal pattern requirements effective July 1, 2022 to reflect the Dietary Guidelines for Americans 2020-2025. This final rule established Sodium Target 1 as the sodium limit for school lunch and breakfast in SY 2022-2023 as proposed, but implements a Sodium Interim Target 1A effective for school lunch beginning in SY 2023-2024. For more information, see SP05-2022, *Meal Requirements Under the NSLP & SBP: Q&A for Program Operators Updated to Support the Transitional Standards Effective July 1, 2022*.

Note: Assessing Compliance with Zero Trans-Fat Requirement

During the on-site review, the Contractor must review manufacturers' food labels and packaging to ensure that foods offered in reimbursable school meals contain zero grams of trans-fat per serving. A minimal amount of naturally occurring trans-fat — found in products such as beef, lamb, and dairy products made with whole milk — is permitted. If there is trans-fat listed on the Nutrition Facts Label of a product containing meat or dairy, the SFA should request documentation from the manufacturer that reports the source of the trans-fat in the product.

TECHNICAL ASSISTANCE AND CORRECTIVE ACTION

When the Contractor conducts a Meal Compliance Nutrition Review and finds that the site is not meeting the dietary specifications requirements for calories, saturated fat, sodium, or trans-fat (as specified in 7 CFR 210.10(f) and 7 CFR 220.8(f)), technical assistance is provided and corrective action is required. The Contractor and SFA must develop a Corrective Action Plan with specific steps and reasonable timelines to bring the SFA into compliance (as required in 7 CFR 210.10(h) and 7 CFR 220.8(h)). The Corrective Action Plan will vary depending on the nature of the changes necessary. The Contractor may accept corrective action during the review, or — if the site cannot immediately implement the corrective action — the Contractor can require it as part of a Corrective Action Plan.

If the Contractor implements and verifies immediate corrective action during the on-site portion of the Meal Compliance Nutrition Review, the new practice should be included in the weighted nutrient analysis. For example, if the Contractor identifies high-sodium items on the

salad bar, and then the SFA eliminates those items immediately, the Contractor would not include the high-sodium salad bar items in the weighted nutrient analysis.

If no immediate corrective action takes place, the Contractor must include current practices in the weighted nutrient analysis. For example, if the SFA cannot immediately eliminate high-sodium items on the salad bar, but will work with their vendor in order to correct this in the future, the Contractor must include the high sodium items in the weighted nutrient analysis.

Recording Errors

Errors related to the dietary specifications are recorded on Questions 603 and 605 of the *Meal Compliance Nutrition Review Tool*.

SFA Fails to Submit Documentation Necessary to Complete Review

The Contractor must do their best to get the menu documentation needed to complete the Meal Compliance Nutrition Review. If, after multiple attempts to obtain menu documentation from the SFA, the Contractor does not receive needed documentation and cannot complete the Meal Compliance Nutrition Review, the contractor must immediately contact the SDE lead reviewer. Program compliance cannot be satisfactorily verified and the SDE must withhold program payments (7 CFR 210.24).

The Contractor must maintain all email communications with the SFA and submit copies of all email correspondence with the SFA to the SDE as one of the Meal Compliance Nutrition Review deliverables.

FISCAL ACTION

7 CFR Part 210.18(l)(2) gives state agencies discretion to apply fiscal action for repeated violations involving calories, saturated fat, sodium, and/or trans-fat, provided that:

1. The previous technical assistance has been given
2. The SDE has previously required and monitored corrective action
3. The SFA remains noncompliant with the meal requirements established in 7 CFR Parts 210 or 220.

If, upon repeated violations, the SDE exercises discretion to take fiscal action for dietary specifications violations, all meals for the entire week may be disallowed/reclaimed, if applicable. Fiscal action is limited to the targeted site. **A weighted nutrient analysis using USDA-approved software is required to justify any fiscal action that may be required due to noncompliance with dietary specifications requirements.** Communication with the SDE lead reviewer is necessary in this instance so that withholding may occur.

If the Contractor's review finds that significant noncompliance exists that requires the SFA to develop and implement a Corrective Action Plan over an extended period of time (e.g.,

problems that cannot be fixed immediately); the Contractor must use her/his best judgment to assess the longevity and severity of the problems and communicate this to the SDE lead reviewer.

COMMENDATIONS

During the course of conducting a Meal Compliance Nutrition Review, the Contractor may observe best practices implemented by the SFA that are noteworthy. The Contractor is encouraged to document these practices in a separate Word document and provide it to the SDE as one of the Meal Compliance Nutrition Review deliverables.

DELIVERABLES FOR SINGLE SITE REVIEW

For a Single Site Meal Compliance Nutrition Review to be considered complete, all deliverables must be completed and delivered via email to the SDE lead reviewer at least ten working days before the SDE administrative review team conducts their on-site portion of the administrative review.

Deliverables include:

- a. Completed *USDA Meal Certification of Compliance Worksheet(s)* for targeted site for the menu review week of the review period
 - i. Copies of all menus, production records, standardized recipes, CN labels, PFSs product labels, etc., for the week of review
- b. Completed *Dietary Specifications Assessment Tool* for targeted site
- c. Completed Weighted Nutrient Analysis of targeted site (if applicable)
 - i. Copies of all menus, production records, CN labels, PFS product labels, standardized recipes, etc. used for the weighted nutrient analysis
- d. Completed *Nutrient Analysis Checklist* (if applicable)
- e. Completed *Meal Compliance Nutrition Review Tool*
- f. Any Corrective Action Plans
- g. Summary of technical assistance provided
- h. Commendations, if applicable
- i. Copies of any email correspondence between Contractor and SFA

MULTI-SITE REVIEW

For large SFAs that require more than one site to be reviewed, the SDE will select one site as the targeted site.

The Contractor must conduct a Meal Compliance Nutrition Review on the targeted site following the instructions detailed under the Single Site Review section of this guide.

In addition, the Contractor must complete the *USDA Meal Certification of Compliance*

Worksheet(s) for each of the remaining sites, following the Single Site Review procedure for the Meal Compliance and Quantities Module; Off-Site Procedure only.

DELIVERABLES FOR MULTI-SITE REVIEW

For a Multi-Site Meal Compliance Nutrition Review to be considered complete, all deliverables must be completed and delivered via email to the SDE lead reviewer at least ten working days before the SDE administrative review team conducts their on-site portion of the administrative review.

Deliverables include:

- a. Completed *USDA Meal Certification of Compliance Worksheet(s)* for the menu review week of the review period for the targeted site AND each additional site
 - i. Copies of all menus, production records, standardized recipes, CN labels, PFSs product labels, etc. for the week of review for targeted site AND each additional site
- b. Completed *Dietary Specifications Assessment Tool* for targeted site
- c. Completed Weighted Nutrient Analysis of targeted site (if applicable)
 - i. Copies of all menus, production records, CN labels, PFS product labels, standardized recipes, etc. used for the weighted nutrient analysis
- d. Completed *Nutrient Analysis Checklist* for targeted site (if applicable)
- e. Completed *Meal Compliance Nutrition Review Tool*
- f. Any Corrective Action Plans
- g. Summary of technical assistance provided
- h. Commendations, if applicable
- i. Copies of any email correspondence between Contractor and SFA

RESOURCES

Website links for resources noted in this guide:

Regulations

National School Lunch Program and School Breakfast Program regulations referenced in this guide can be found on the [Electronic Code of Federal Regulations](#) website.

Civil Rights regulations referenced in this guide can be found on the [Electronic Code of Federal Regulations](#) website.

Policy Memos

National School Lunch Program and School Breakfast Program policy memos referenced in this guide can be found on the [USDA Food and Nutrition Service](#) website. Additional guidance can be located on USDA's [Nutrition Standards for School Meals](#) webpage and [Nutrition Standards](#)

[for CACFP Meals and Snacks](#) webpage.

USDA Meal Certification of Compliance Worksheets

The *USDA Meal Certification of Compliance Worksheets* referenced in this guide can be found on the [USDA Food and Nutrition Service](#) website.

Offer versus Serve (OVS)

The *Offer versus Serve* Memorandum and Manual can be found on the [USDA Food and Nutrition Service](#) website.

List of USDA Approved Nutrient Analysis Software

The list of USDA approved nutrient analysis software can be found on the [USDA Food and Nutrition Service](#) website.

Nutrient Analysis Protocols: How to Analyze Menus for USDA's School Meals Programs

The resource, *Nutrient Analysis Protocols: How to Analyze Menus for USDA's School Meals Programs* (updated 2022), can be found on the [USDA Food and Nutrition Service](#) website.

Food Buying Guide

The *Food Buying Guide* can be found on the [USDA Food and Nutrition Service Team Nutrition](#) website.

Whole Grain Resource

The Whole Grain Resource for the National School Lunch and Breakfast Programs can be found on the [USDA Food and Nutrition Service Team Nutrition](#) website.

Meal Accommodations

The *2017 Edition of Accommodating Children with Disabilities in the School Meal Programs*, can be found on the [USDA Food and Nutrition Service](#) website. Additional guidance can be located in [SP26-2017 Accommodating Disabilities in the School Meal Programs: Guidance and Questions and Answers](#).

EXHIBITS

Exhibit 1: *Meal Compliance Nutrition Review Tool*

Exhibit 2: *CNP Medical Statement Form*

Exhibit 3: FNS Instruction 783-7, rev 1, *Milk Requirement-Child Nutrition Programs* (revised, issued January 24, 1995)

Exhibit 4: FNS Instruction 783-9, rev 2, *Family Style Meal Service in the Child and Adult Care Food Program*

Exhibit 5: FNS Instruction 786-8, rev 1, *Reimbursement for Off-Site Meal Consumption*

Exhibit 6: *Dietary Specifications Assessment Tool*

Exhibit 7: *Nutrient Analysis Checklist*

Meal Compliance Nutrition Review Tool

(Effective SY18-19)

SITE _____ DATE OF REVIEW _____

MEAL COMPLIANCE NUTRITION REVIEW TOOL

This tool must be completed for each School Food Authority (SFA) receiving an Administrative Review of the United States Department of Agriculture (USDA) National School Lunch Program (NSLP) and School Breakfast Program (SBP) by the Idaho State Department of Education, Child Nutrition Programs (SDE).

This tool is used to evaluate the meal components and quantities served on the day of review and for the review period, and assess for the review period, whether meals offered are consistent with federal nutrient standards.

Refer to the *Meal Compliance Nutrition Review Guide* as well as the instructions below to complete this tool.

MEAL COMPONENTS AND QUANTITIES MODULES

All meals missing required meal components are NSLP Administrative Review Performance Standard 2 (PS2) violations and must be corrected.

When multiple meal pattern violations are identified for a meal, list all violations in the appropriate Comments section. Record meals with multiple violations on only one meal violation category to ensure that fiscal action is applied only once. If multiple violations include meals served with missing meal components, record the meal under the missing meal component category. For all other multiple meal pattern error violations, record repeated vegetable sub-group or milk type violations before all other violations. For all other multiple meal pattern violations, use discretion and record the most egregious violation for fiscal action.

ON-SITE REVIEW PROCEDURE FOR MEAL COMPONENTS AND QUANTITIES

Record menu overserved the day of review.

400.

- a. Prior to the beginning of meal services, identify whether all required meal components are available on every reimbursable meal service line. If NO, explain all errors identified and the technical assistance provided. The site should be advised and given the opportunity to add any missing meal component(s) before the meal service begins. If the missing meal component(s) is added, answer YES but record the error and technical assistance that was provided in the Comments section. If the deficiency was not corrected prior to the

beginning of meal service, list the number of meals served from the applicable meal service line that were missing required meal components in the Comments section.

- b. During the meal service, observe that all required meal components are available on every reimbursable meal service line throughout the entire meal service. If NO, explain all errors identified and the technical assistance provided. If deficiencies are identified, list the number of meals served from the applicable meal service line missing required meal components in the Comments section. Combine the total in the Comments section with errors identified in #401 and record on S-1, Line 11.

401. During the meal service, observe a significant number of program meals counted as reimbursable on every reimbursable meal service line. Observe between 5% to 25% of meals served on each reimbursable meal service line. Meals should be observed at the beginning, middle, and end of the meal service. During meal service observation, determine whether the meals selected by students as they exit the Point of Service (POS) contain the meal components and food quantities required for the age/grade group being served. If NO, explain all errors identified and the technical assistance provided. If deficiencies are identified, record the number of meals observed missing required meal components, which includes the requirement for at least ½ cup of fruits/vegetables under Offer versus Serve (OVS), in the Comments section. Combine this total with errors identified in #400 and record on S-1, Line 11.

402. Evaluate whether the portion sizes of meal components from the planned menu and served on the day of review meet the minimum meal pattern requirements for the age/grade group(s) being served. If NO, explain all errors identified and the technical assistance provided. Indicate whether the violations identified were repeat violations for the SFA. Record only the number of incomplete meals counted for reimbursement that will be subject to fiscal action in the appropriate field on S-1, Line 12. (Refer to 7 CFR 210.10 for more guidance.)

403.

- a. Determine whether at least two required milk varieties are available throughout the serving period on all meal service lines.
- b. If substitutions are made, evaluate whether the substitutions were allowable per 7 CFR Part 210.10. If NO, explain all errors identified and the technical assistance provided. Indicate whether the violations identified were repeat violations for the SFA.

Record only the number of incomplete meals counted for reimbursement that will be subject to fiscal action in the appropriate field on S-1, Line 12.

404.

- a. Determine whether what constitutes a reimbursable meal is identified near or at the beginning of the meal service line(s) for both breakfast and lunch. (See 7 CFR 210.10(a)(2))
- b. Ensure that program operators do not promote or offer water or any other beverage as an alternative selection to fluid milk throughout the food service area.

405. If the site reviewed serves meals Family Style, evaluate whether the meal service is acceptable per FNS Instruction 783-9. If NO, explain all errors identified and the technical assistance provided.

406. If a site is serving multiple menus and/or age/grade groups, the Contractor must evaluate how the site has structured the meal service to meet the specific meal pattern requirements for each menu type and/or age/ grade group being served. List all errors identified and the technical assistance provided.

407. Obtain a copy of the planned menu for the day of review and compare it to what was actually offered on the meal service line. While substitutions are allowed, the Contractor must ensure that the daily meal pattern minimums for each meal service line, menu type, and age/grade group are still met. If NO, explain all errors identified and the technical assistance provided. Record only the number of incomplete meals counted for reimbursement that will be subject to fiscal action in the appropriate field on S-1, Line 12.

408. This question has been omitted as it requires guidance and approval by the SDE to answer.

REVIEW PERIOD

409. The Contractor must examine production records for a week from the review period. The minimum number of school days in the week reviewed is three (3), and the maximum is seven (7). All must be consecutive days. The Contractor may examine any food crediting documentation, including but not limited to food labels, product formulation statements, CN labels, and bid documentation to ensure meal pattern compliance. Evaluate whether the meals served meet the appropriate daily and weekly meal pattern requirements for the age/grade group(s) being served. If critical issues are identified from the initial documentation review, the Contractor must expand the scope of review to the entire review period. If NO, explain all errors identified and the technical assistance provided.

Indicate whether the violations identified were repeat violations for the SFA. Record the

number of meals missing required meal components on S-1, Line 15. Record only the number of incomplete meals claimed for reimbursement that will be subject to fiscal action in the appropriate field on S-1, Line 16.

410. Evaluate production records to determine whether the portion sizes of meal components from the planned menu and served during the review period meet the minimum meal pattern requirements for the age/grade group(s) being served. If NO, explain all errors identified and the technical assistance provided. Indicate whether the violations identified were repeat violations for the SFA. Record only the number of incomplete meals claimed for reimbursement that will be subject to fiscal action in the appropriate field on the S-1, Line 16. (Refer to 7 CFR 210.10 for more guidance.)
411. Obtain a copy of the planned menu for the review period and compare it to a week (3-7 days) of production records from the review period. While substitutions are allowed, ensure that the daily meal pattern minimums for each meal service line, menu type, and age/grade group are still met. If NO, explain all errors identified and the technical assistance provided. Indicate whether the violations identified were repeat violations for the SFA. Record the number of meals observed missing required meal components on the S-1, Line 15. Record only the number of incomplete meals claimed for reimbursement that will be subject to fiscal action in the appropriate field on S-1, Line 16.
-

412. This question has been omitted as it requires guidance and approval by the SDE to answer.

Module: Meal Components and Quantities

Day of Review – Site Level Questions

NSLP MENU:

SBP MENU:

400. Were all required meal components available on every reimbursable meal service line to all participating students:

a. Prior to the beginning of meal service?

NSLP

☐ Yes

☐ No

☐ N/A

SBP

☐ Yes

☐ No

☐ N/A

b. During the meal service?

NSLP

☐ Yes

☐ No

☐ N/A

SBP

☐ Yes

☐ No

☐ N/A

If NO to a or b, explain all errors identified and the technical assistance provided in the Comments section.

If the error was not corrected prior to the beginning of the meal service, or if the meal service line did not offer all required meal components throughout the meal service, list the number of meals served from the applicable meal service line missing the required meal components in the Comments section. Combine this total with errors identified in #401 and record on S-1, 11 (Question 401).

Comments:

401. Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?

NSLP

☐ Yes

☐ No

☐ N/A

SBP

☐ Yes

☐ No

☐ N/A

If NO, explain any errors identified and the technical assistance provided in the Comments section.

Record the number of meals observed missing required meal components, which includes the requirement for at least ½ cup of fruits/vegetables under OVS, in the Comments section. Combine this total with errors identified in #400 and record on S-1, 11.

Comments:

S1, 11 MEALS SERVED MISSING MEAL COMPONENTS:

Lunch

*Day of review: # of Meals*_____

Review Period:

Date:_____# of Meals:_____ Date:_____# of Meals:_____ Date:_____# of Meals:_____ Date:

of Meals:_____ Date:_____# of Meals:_____ Date:_____# of Meals:_____ Date:_____# of Meals:

Date:_____# of Meals:_____ Date:_____# of Meals:_____

Breakfast

*Day of review: # of Meals*_____

Review Period:

Date:_____# of Meals:_____ Date:_____# of Meals:_____ Date:_____# of Meals:_____ Date:

of Meals:_____ Date:_____# of Meals:_____ Date:_____# of Meals:_____

Date:_____# of Meals:_____ Date:_____# of Meals:_____ Date:_____# of Meals:_____

402. Are the minimum daily quantity requirements met for the age/grade group being offered?

NSLP

☐ Yes

☐ No

☐ N/A

SBP

☐ Yes

☐ No

☐ N/A

If NO, list all the errors identified and the technical assistance provided. Indicate whether the violations identified were repeat violations in the SFA.

NSLP

Meat or meat alternate:

Fruits:

Vegetables:

Grains or Breads:

Milk:

SBP

Grains or Breads:

Fruits:

Milk:

Comments:

403.

- a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?

NSLP

☐ Yes

☐ No

☐ N/A

SBP

☐ Yes

☐ No

☐ N/A

b. If milk substitutions are made, are they allowable?

NSLP

☐ Yes

☐ No

☐ N/A

SBP

☐ Yes

☐ No

☐ N/A

If NO to a or b, list all the errors identified and the technical assistance provided. Indicate whether the violations identified were repeat violations for the SFA. Record only the number of incomplete meals counted for reimbursement that will be subject to fiscal action in the appropriate field on S-1, 12.

Comments:

S-1, 12 – INCOMPLETE MEALS (REPEAT ONLY):

Lunch:

Milk Type: _____ WG Rich Foods: _____ Vege Sub-Group: _____ Food Quantitates: _____

Dietary Spec: _____

Breakfast:

Milk Type: _____ WG Rich Foods: _____ Food Quantitates: _____ Dietary Spec: _____

404.

a. Is there signage explaining what constitutes a reimbursable breakfast to students for all applicable grade groups?

☐ YES

☐ NO

b. Is there signage explaining what constitutes a reimbursable lunch to students for all applicable grade groups?

☐ YES

☐ NO

c. Does signage promote water or any other beverage as an alternative selection to fluid milk throughout the food service area?

☐ YES

☐ NO

If NO to a, b, or YES to c, explain and list the technical assistance provided in the Comments.

Comments:

a.

b.

c.

405. If the site has elected to serve meals using the Family Style Method, is the site implementing method as specified in FNS Instruction 783-9?

NSLP

☐ Yes

☐ No

☐ N/A

SBP

☐ Yes

☐ No

☐ N/A

If NO, list the issues identified and the technical assistance provided.

Comments:

406. If the site is serving multiple menus and/or age/grade groups, is the meal service structured to comply with the required age/grade group meal pattern requirements? Describe the structure in the Comments section.

NSLP

☐ Yes

☐ No

☐ N/A

SBP

☐ Yes

☐ No

☐ N/A

List any errors identified and the technical assistance provided.

Comments:

407.

a. Has the site offered the planned menu for the day of review?

NSLP

☐ Yes

☐ No

☐ N/A

SBP

☐ Yes

☐ No

☐ N/A

b. If changes are being made to the planned menu, are the changes acceptable substitutions?

NSLP

☐ Yes

☐ No

☐ N/A

SBP

☐ Yes

☐ No

☐ N/A

If NO to a or b, list all errors identified and the technical assistance provided. Record only the number of incomplete meals counted for reimbursement that will be subject to fiscal action in the appropriate field on S-1, 12 (Question 403).

Comments:

Module: Meal Components and Quantities

Review Period

409. Review production records and other supporting documentation, did all reviewed meals during the review period indicate that all of the required meal components per weekly meal pattern requirements were offered and served to students?

NSLP

☐ Yes

☐ No

☐ N/A

SBP

☐ Yes

☐ No

☐ N/A

If NO, explain any errors identified and the technical assistance provided. Indicate whether the violations identified were repeat violations for the SFA.

Record the number of meals observed missing required meal components on S-1, 15.

Record only the number of incomplete meals claimed for reimbursement that will be subject to fiscal action in the appropriate field on S-1, 16.

Comments:

S1-15:

Breakfast: _____ Lunch: _____

S-1, 16 – INCOMPLETE MEALS (REPEAT ONLY) IN REVIEW MONTH:

Lunch:

Milk Type: _____ WG Rich Foods: _____ Vege Sub-Group: _____ Food Quantitates: _____

Dietary Spec: _____

Breakfast:

Milk Type: _____ WG Rich Foods: _____ Food Quantitates: _____ Dietary Spec: _____

410.

- a. Do planned menu quantities meet meal pattern requirements for the review period?

NSLP

☐ Yes

☐ No

☐ N/A

SBP

☐ Yes

☐ No

☐ N/A

b. If NO to a, do production records and/or other supporting documentation for the review period indicate that the required quantities of food were available?

NSLP

☐ Yes

☐ No

☐ N/A

SBP

☐ Yes

☐ No

☐ N/A

c. If NO to a or b, list all the errors identified and the technical assistance provided. Indicate whether the violations identified were repeat violations for the SFA.

NSLP

☐ Yes

☐ No

☐ N/A

SBP

☐ Yes

☐ No

☐ N/A

Record only the number of incomplete meals claimed for reimbursement that will be subject to fiscal action in the appropriate field on S-1, 16 (Question 409).

Comments:

411.

a. Did the site comply with the planned menu for the review period?

NSLP

☐ Yes

☐ No

☐ N/A

SBP

☐ Yes

☐ No

☐ N/A

b. If changes are being made to the planned menu, are the changes acceptable substitutions?

NSLP

☐ Yes

☐ No

☐ N/A

SBP

☐ Yes

☐ No

☐ N/A

- c. If NO to a or b, list all the errors identified and the technical assistance provided. Record the number of meals observed missing required meal components on S-1, 15 (Question 409). Record only the number of incomplete meals claimed for reimbursement that will be subject to fiscal action in the appropriate field on S-1, 16 (Question 409).

Comments:

DIETARY SPECIFICATIONS AND NUTRIENT ANALYSIS MODULE

603. Determine whether any applicable off-site dietary specifications and nutrient analysis activities resulted in areas being identified that required technical assistance or corrective action prior to the beginning of the on-site portion of the review. If technical assistance or corrective action was necessary, explain in the Comments section.
604. If Option 1 is selected to complete the targeted menu review, indicate the on-site validation risk determination (see Meal Compliance Nutrition Review Guide, Dietary Specifications and Nutrient Analysis Module).
605. If a weighted nutrient analysis was not conducted due to a validated low risk score from the *Dietary Specifications Assessment Tool*, check the low risk box. If a weighted nutrient analysis was conducted by the Contractor (due to a high-risk score from the *Dietary Specifications Assessment Tool*) or the SDE selected Option 2, and not all the dietary specifications were met for the established age/grade group and menu type, record which method was used and which Program was deficient in the Comments section and answer NO.

If a weighted nutrient analysis was conducted, follow the *Nutrient Analysis Checklist* for properly completing this question. Explain all errors identified and the technical assistance provided. Indicate whether the violations identified were repeat violations for the SFA. Record only the number of meals counted for reimbursement that will be subject to fiscal action on S-1, 16A.

☐ N/A – THIS SITE WAS NOT SELECTED FOR THE TARGETED MENU REVIEW

Module: Dietary Specifications and Nutrient Analysis

Review Period

This section is completed at only the site selected for targeted menu review for Review Period.

(To complete this module, reference the following materials: *Dietary Specifications Assessment Tool* and *Nutrient Analysis Checklist* (if applicable).)

REVIEW PERIOD:

☐ ON-SITE PORTION OF *DIETARY SPECIFICATIONS ASSESSMENT TOOL* COMPLETED

603. Were any areas identified during the off-site review requiring technical assistance or corrective action prior to the beginning of the on-site portion of the review?

NSLP

☐ Yes

☐ No

☐ N/A

SBP

☐ Yes

☐ No

☐ N/A

If so, explain.

Comments:

604. If Option 1 is selected to complete the targeted menu review (i.e. completed the off-site portion of the *Dietary Specifications Assessment Tool*), what was the on-site validation of the risk determination?

☐ Low-Risk

☐ High-Risk

☐ N/A

Comments:

605. Based on the Weighted Nutrient Analysis, did the site meet the Dietary Specifications (Calories, Saturated Fat, Sodium, and *Trans* Fat) for the appropriate age/grade group being served?

SELECT N/A IF LOW RISK

NSLP

☐ Yes

☐ No

☐ N/A

SBP

☐ Yes

☐ No

☐ N/A

If NO, list all the errors identified and the technical assistance provided. Indicate whether the violations identified were repeat violations for the SFA. Record only the number of meals counted for reimbursement that will be subject to fiscal action on S-1, 16A (Question 409).

Comments:

INFANT AND PRE-K MEAL PATTERN CHECKLIST MODULE

- 9.2.1.1 Determine whether the reviewed school offers infant meals. If Yes, identify if infants are served all components as required in the new infant meal pattern. If technical assistance is necessary, explain in the Comments section.
- 9.2.1.2 Prior to meal service, determine if Pre-K students are comingled with K-5 students in the meal service area. Refer to SP37-2017 *Flexibility for Co-Mingled Preschool Meals: Questions and Answers*. If Pre-K students are using the meal pattern flexibility allowing one menu when students are comingled, describe the grades that are comingled and include Pre-K students with regular review questions in meal components and quantities module and dietary specifications and nutrient analysis module and do not complete this meal pattern checklist any further. If Pre-K students are not comingled with K-5 students in the meal service area, complete questions 3-12.
- 9.2.1.3 During the meal service, observe if all required meal components for Pre-K are available throughout the entire meal service. Reference SP01-2018 *Updated Infant and Preschool Meal Patterns in the National School Lunch Program and School Breakfast Program: Questions and Answers*. If NO, explain all errors identified and technical assistance provided in the Comments section.
- 9.2.1.4 Determine if the cereal served to Pre-K meets the Pre-K meal requirements (no more than 6 grams of sugar per dry ounce). If NO, explain technical assistance provided in the Comments section.
- 9.2.1.5 Determine if the yogurt served to Pre-K meets the Pre-K meal requirements (no more than 23 grams of sugar per 6 ounces). If NO, explain all errors identified and technical assistance provided in the Comments section.
- 9.2.1.6 Determine if there were any grain based desserts served as part of the reimbursable meal (e.g.

cookies, sweet pie crusts, doughnuts, cereal bars, breakfast bars, granola bars, sweet rolls, toaster pastries, cakes, and brownies). Refer to Exhibit A. Note that grain based desserts are not creditable as part of the reimbursable meal but may be served as an extra meal item. If YES, explain technical assistance provided in the Comments section.

- 9.2.1.7 Determine if a whole grain-rich item was served during at least one meal per day. If NO, explain technical assistance provided in the Comments section.
- 9.2.1.8 Determine if a meat/meat alternate was used to meet the entire grain requirement and identify if it was used more than three times a week. If YES, explain technical assistance provided in the Comments section.
- 9.2.1.9 Determine if fried foods are prepared on site. If YES, explain technical assistance provided in the Comments section.
- 9.2.1.10 Determine if a vegetable was served in place of a fruit at lunch to Pre-K and identify if two different vegetable were served. If NO, explain technical assistance provided in the Comments section.
- 9.2.1.11 Determine if the appropriate milk type was served for preschool age kids (unflavored whole milk for children age one and unflavored low-fat (1%) and fat-free (skim) milk for children 2-5 years of age. If NO, explain technical assistance provided in the Comments section.
- 9.2.1.12 Determine if pasteurized full-strength juice was served to Pre-K more than once per day. If YES, explain technical assistance provided in the Comments section.
- 9.2.1.13 Determine if Offer versus Serve (OVS) was implemented for Pre-K during meal service. If YES, explain technical assistance provided in the Comments section.
- 9.2.1.14 If family style meal service is used, determine if it is implemented correctly including having all components available and a supervising adult actively encouraging students to try components. Identify correct implementation according to procedures outlined in FNS Memorandum SP 35-2011, Clarification on the Use of Offer versus Serve (OVS) and Family Style Meal Service and FNS Instruction 783-9, rev 2, Family Style Meal Service in the Child and Adult Care Food Program. If YES, describe the service in the Comments section. If NO, explain technical assistance provided in the Comments section or explain that Family Style service is not implemented.

☐ N/A – THIS SITE DOES NOT SERVE INFANT OR PRE-K MEALS

Module: Infant and Pre-K Meal Pattern Checklist

Does the School reviewed offer infant meals?

LUNCH

☐ Yes

☐ No

BREAKFAST

☐ Yes

☐ No

If Yes, proceed to question # 1. If No, proceed to question #2.

1. Are infants served all components as required in the new infant meal pattern?

LUNCH

☐ Yes

☐ No

BREAKFAST

☐ Yes

☐ No

If No, explain technical assistance provided.

Comments:

2. Is the SFA using the meal pattern flexibility and offering one menu when Pre-K students are co-mingled in the meal service area?

LUNCH

☐ Yes

☐ No

BREAKFAST

☐ Yes

☐ No

If Yes, please describe grades that are co-mingled and include Pre-K with regular review questions and do not complete checklist further. If No, this checklist must be completed.

Comments:

3. During the meal service, did you observe that all required meal components for Pre-K are available throughout the entire meal service?

LUNCH

☐ Yes

☐ No

BREAKFAST

☐ Yes

☐ No

If No, explain all errors identified and the technical assistance provided.

Comments:

4. Does all the cereal served to Pre-K meet the Pre-K meal requirements (no more than 6 grams of sugar per dry ounce)?

LUNCH

☐ Yes

☐ No

BREAKFAST

☐ Yes

☐ No

If No, explain technical assistance provided.

Comments:

5. Does all the yogurt served to Pre-K meet the Pre-K meal requirements? (no more than 23 grams of sugar per 6 ounces)

LUNCH

☐ Yes

☐ No

BREAKFAST

☐ Yes

☐ No

If No, explain technical assistance provided.

Comments:

6. Were there any grain-based desserts served as part of the reimbursable meal? (e.g. cookies, sweet pie crusts, doughnuts, cereal bars, breakfast bars, granola bars, sweet rolls, toaster pastries, cakes and brownies),

LUNCH

☐ Yes

☐ No

BREAKFAST

☐ Yes

☐ No

If Yes, explain technical assistance provided— refer to exhibit A.

Note: Grain based desserts are not creditable as part of the reimbursable meal but may be served as an extra meal item.

Comments:

7. Was a whole grain-rich item served at least one time at any of the 3 meals (lunch, breakfast and/or snack)?

LUNCH

☐ Yes

☐ No

BREAKFAST

☐ Yes

☐ No

If No, explain technical assistance provided.

Comments:

8. Was a meat/meat alternate used to meet the entire grain requirements at breakfast?

LUNCH

☐ Yes

☐ No

BREAKFAST

☐ Yes

☐ No

- a. If Yes, was it used more than three times a week?

LUNCH

☐ Yes

☐ No

BREAKFAST

☐ Yes

☐ No

If Yes, explain technical assistance provided.

Note: A meat/meat alternate cannot be used to substitute the grain requirements at breakfast more than three

times a week.

Comments:

9. Are fried foods prepared on site?

LUNCH

☐ Yes ☐ No

BREAKFAST

☐ Yes ☐ No

If Yes, explain technical assistance provided.

Comments:

10. If a vegetable was served in place of a fruit at lunch, were two different vegetables served?

LUNCH

☐ Yes ☐ No

BREAKFAST

☐ Yes ☐ No

If No, explain technical assistance provided.

Comments:

11. Was the appropriate milk type served?

LUNCH

☐ Yes ☐ No

BREAKFAST

☐ Yes ☐ No

- Unflavored whole milk for children age one
- Unflavored low-fat (1 percent) or unflavored fat-free (skim) milk for children 2-5 years of age

If No, explain technical assistance provided.

Comments:

12. Was pasteurized full strength juice served more than once per day?

- LUNCH
☐ Yes ☐ No
- BREAKFAST
☐ Yes ☐ No

If Yes, explain technical assistance provided.

Note: Pasteurized full-strength juice is limited to once per day (including snack).

Comments:

13. Was Offer versus Serve (OVS) implemented during meal service?

- LUNCH
☐ Yes ☐ No
- BREAKFAST
☐ Yes ☐ No

If Yes, explain technical assistance provided.

Note: OVS is not an option for preschool age kids.

Comments:

14. Is family style meal service implemented correctly?

- LUNCH
☐ Yes ☐ No
- BREAKFAST
☐ Yes ☐ No

- *All components available*

- *Supervising adults actively encouraging students to try components, etc.*

Note: According to procedures outlined in FNS Memorandum SP 35-2011, Clarification on the Use of Offer versus Serve (OVS) and Family Style Meal Service and FNS Instruction 783-9, rev 2, Family Style Meal Service in the Child and Adult Care Food Program.

Comments:



MEDICAL STATEMENT

REQUEST FOR MEAL ACCOMMODATION DUE TO MEDICAL CONDITION:

A licensed physician, physician assistant, nurse practitioner, naturopathic medical doctor or dentist must sign this form (line 14)

(1) Name of Student/ Participant	(2) Date of Birth	(3) District/Organization	(4) School/Site
(5) Name of Parent /Guardian, or Auth. Rep.		(6) Telephone (Parent /Guardian, or Auth. Rep.)	
<p>(7) Determination</p> <p>By completing this form, it was determined that the Student/Participant has a medical condition or is disabled and requires a special meal or accommodation based on the following criteria:</p> <p>The Americans with Disabilities Act (ADA) Amendments Act of 2008 made important changes to the meaning and interpretation of the term "disability." The changes demonstrated Congress's intent to restore the broad scope of the ADA by making it easier for an individual to establish that he or she has a disability. After the passage of the ADA Amendments Act, most physical and mental impairments constitute a disability. Therefore, rather than focusing on whether or not a participant has a disability, sponsors focus on working collaboratively with parents, guardians or participants to ensure an equal opportunity to participate in the Child Nutrition Programs and receive program benefits.</p> <p>"Disabled person" Any person who has a physical or mental impairment which substantially limits one or more "major life activities", has a record of such impairment, or is regarded as having such impairment.</p> <p>"Physical or mental impairment" means (1) any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; respiratory (including speech) organs; cardiovascular; reproductive; digestive; genitourinary; hemic and lymphatic; skin; and endocrine; or (2) any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities.</p> <p>"Major life activities" are broadly defined and include, but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working. "Major life activities" also include the operation of a major bodily function, including but not limited to, functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions. (See 29 USC § 705(9) (b) and 42 USC § 12101.)</p>			
<p>(8) Provide a brief description of student/participant's physical or mental impairment that substantially limits one or more major life activity:</p>			
<p>(9) Diet prescription and/or accommodation: (Please describe in detail to ensure proper implementation)</p>			
<p>(10) Indicate texture: Regular Chopped Ground Pureed Liquid Other (describe)</p>			
<p>Instructions: Please list specific foods to be omitted and recommended alternatives. You may use the back of this form or attach a sheet with additional information.</p>			
(11) Foods to be Omitted		(12) Recommended Alternatives	
<p>(13) Adaptive Equipment:</p>			
(14) Signature of Medical Authority	(15) Medical Authority Printed Name	(16) Telephone	(17) Date
(18) Signature of Parent/Guardian	(19) Printed Name	(20) Telephone	(21) Date

INSTRUCTIONS: Fill in the fields with the following information

- 1) Individual who will receive the meal.
- 2) Date of Birth of participant
- 3) Name of the organization where Child Nutrition Program meals will be served.
- 4) Location where meal will be served (e.g., school site, child care center, community center, RCCI.)
- 5) Name of student/participant's parent, guardian, or authorized representative (i.e. individual responsible for the care of student/participant in CNP program).
- 6) Telephone number of guardian, parent, or authorized representative.
- 7) Determination of medical condition or disability with definitions.
- 8) Describe how condition affects eating. For example: "Allergy to peanuts causes anaphylactic shock which causes trouble breathing, choking, and potential death unless epinephrine injection is given immediately to the child and the child is sent to the emergency room for follow-up treatment."
- 9) Describe specific diet or accommodation that has been prescribed by a physician. For example, "All foods must be either in liquid or pureed form. Child cannot consume any solid foods."
- 10) Check the type of texture of food that is required. If the participant does not need any modification check "regular". The "other" category might be used to specify when various liquid consistencies are prescribed (i.e. thin, nectar, honey, pudding).
- 11) List specific foods that need to be omitted. For example, "exclusion of fluid milk."
- 12) List specific foods to include in the diet. For example, "lactose reduced milk, soy milk."
- 13) Describe specific equipment required to feed the participant. (Examples may include tippy cup, large handled spoon, wheel-chair accessible furniture, etc.)
- 14) Signature of medical authority requesting the special meal or accommodation.
- 15) Print name of medical authority.
- 16) Telephone number of medical authority.
- 17) Indicate when form was completed.
- 18) Signature of parent/guardian.
- 19) Print name of parent/guardian.
- 20) Telephone number of parent/guardian.
- 21) Indicate when form was completed.

This institution is an equal opportunity provider

UNITED STATES DEPARTMENT OF AGRICULTURE
Food and Nutrition Service
3101 Park Center Drive
Alexandria, VA 22302

FCS INSTRUCTION 783-7
REV. 1

ACTION BY: Regional Directors
Special Nutrition Programs

SOURCE CITATION: Sections 210.10, 215.7, 220.8, 225.16, 226.20

Milk Requirement-Child Nutrition Programs

This Instruction clarifies which types of milk may be used to fulfill the milk component requirement of the Child Nutrition Programs. The Instruction has four sections: a) The minimum standards which apply to all Child Nutrition Programs; b) Alternative types of milk; c) Breastmilk for children who are breastfeeding; and d) Unavailability of milk.

(a) Minimum Standards for All Child Nutrition Programs

Any pasteurized type of unflavored or flavored milk-whole, lowfat, skim, or cultured buttermilk-may be used to meet the milk component of all child nutrition programs providing it meets the following stipulations:

- (1) It must meet State and local standards for fluid milk;
- (2) It must be served in at least the quantity required for the applicable age or grade in the appropriate child nutrition program regulations; and
- (3) All milk should contain vitamins A and D. Lowfat and skim milk are required to be fortified with vitamin A at levels specified by the Food and Drug Administration; added vitamin D must also meet Food and Drug Administration specifications.

To clarify the milk standards in a given area or State, contact the State Department of Agriculture, State Health Department, or the State Milk Commissioner, as appropriate.

(b) Alternative Types of Milk

In addition to the types of milk mentioned above (whole, skim, lowfat, and buttermilk), the following may be served if they meet State and local standards for fluid milk and comply with any appropriate special requirements:

Milkshakes. Milkshakes may be used to meet the milk component of lunches, suppers, and the supplemental food served in the Child Nutrition Programs if those milkshakes contain the minimum required quantity of fluid milk per serving appropriate for the age or grade group being served.

DISTRIBUTION: 5, 6, 11, 12, 16	MANUAL MAINTENANCE INSTRUCTIONS: Remove FNS Instruction 783-7 from Manual. Insert this Instruction.	RESPONSIBLE FOR PREPARATION AND MAINTENANCE: NTSD-200	Page 1 1-24-95
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Those made from commercial milkshake mixes may be used if State and local officials define the mix as fluid milk in the area where served.

Ultra-High Temperature (UHT) Milk. UHT Milk is a fluid milk which is pasteurized by heating the milk to a minimum temperature of 280° Fahrenheit for 2-3 seconds. This temperature destroys all the pathogenic and spoilage microorganisms with the exception of a few spores that would remain dormant under normal conditions. As a result of this heat treatment, the product can be stored without refrigeration for 3-12 months.

Acidified Milk. Acidified milk is a fluid milk produced by souring fluid whole, lowfat, or skim milk with an acidifying agent. Examples of acidified milk are "acidified kefir milk" and "acidified acidophilus milk."

Cultured Milk. Cultured milk is a fluid milk produced by adding selected microorganisms to fluid whole, lowfat, or skim milk under controlled conditions to produce a product with specific flavor and/or consistency. Examples of cultured milk are "cultured buttermilk," "cultured kefir milk," and "cultured acidophilus milk."

Lactose Reduced Milk. Lactose reduced milk is a fluid milk modified by the addition of lactase enzymes from a yeast source. The lactose content of this milk differs from that of unmodified lowfat milk in that the disaccharide lactose is split into the monosaccharides, glucose and galactose. People who cannot digest the lactose in milk may benefit from a lactose reduced lowfat milk.

(c) Breastmilk for Children Who are Breastfeeding

In addition to the types of milk mentioned above, breastmilk may be served in place of fluid milk in the Child Nutrition Meal Programs. Breastmilk may be served at meals, snacks, or other appropriate times throughout the day. Breastmilk should be properly identified and labeled with the child's name and the date that the milk was collected. Breastmilk identified for a particular child should only be served to that child. Breastmilk should be stored and handled according to applicable federal and State guidance.

(d) Unavailability of Milk

In Alaska, Hawaii, American Samoa, Guam, Puerto Rico, the Commonwealth of Northern Mariana Islands, and the Virgin Islands, if a sufficient supply of types of fluid milk as described in this Instruction cannot be obtained, "milk" shall include reconstituted or recombined milk.



MARY ANN KEEFFE
Deputy Administrator
For Special Nutrition Programs

UNITED STATES DEPARTMENT OF AGRICULTURE
Food and Nutrition Service
3101 Park Center Drive
Alexandria, VA 22302

FNS INSTRUCTION 783-9
REV. 2

ACTION BY: Regional Directors
Special Nutrition Programs

SOURCE CITATION: Section 226.20

Family Style Meal Service in the
Child and Adult Care Food Program

The Child and Adult Care Program (CACFP) has long been recognized for its nutritional goals of providing nutritious meals to children and helping them establish good eating habits at a young age. Family style meal service provides a further opportunity to enhance these goals by encouraging a pleasant eating environment that will support and promote mealtime as a learning experience.

Family style is a type of meal service which allows children to serve themselves from common platters of food with assistance from supervising adults setting the example. In A Planning Guide for Food Service in Child Care Centers (FNS-64), the chapter, "Make Mealtime a Happy Time," provides guidance for family style meal service in the CACFP. Family style meal service encourages supervising adults to set a personal example and provide educational activities that are centered around foods. This approach allows children to identify, and be introduced to new foods, new tastes, and new menus, while developing a positive attitude toward nutritious foods, sharing in group eating situations, and developing good eating habits.

Unlike cafeteria lines, unitized meals, and pre-set service, the family style method affords some latitude in the size of initial servings because replenishment is immediately available at each table. Even when a complete family style service is not possible or practical, it may be useful to offer a component or components in a family style manner particularly when smaller children are being served or when a new food item is being introduced. This latitude must be exercised in compliance with the following practices, at a minimum:

- (1) A sufficient amount of prepared food must be placed on each table to provide the full required portions (\$226.20) of each of the food components for all children at the table, and to accommodate supervising adult(s) if they eat with the children.

DISTRIBUTION: 5, 6, 11, 12	MANUAL MAINTENANCE INSTRUCTIONS: Remove FNS Instruction 783-9 from Manual. Insert this Instruction.	RESPONSIBLE FOR PREPARATION AND MAINTENANCE: CND-100	Page 1 5-3-93
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- (2) The family style meal service allows children to make choices in selecting foods and the size of the initial servings. Children should initially be offered the full required portion of each meal component.
- (3) During the course of the meal, it is the responsibility of the supervising adults to actively encourage each child to accept service of the full required portion for each food component of the meal pattern. For example, if a child initially refuses a food component, or initially does not accept the full required portion of a meal component, the supervising adult should offer the food component to the child again.
- (4) Institutions which use family style meal service may not claim second meals for reimbursement.
- (5) Meals served which follow the guidelines laid out in this Instruction are eligible for reimbursement.



STANLEY C. GARNETT
Director
Child Nutrition Division

UNITED STATES DEPARTMENT OF AGRICULTURE
Food and Nutrition Service
3101 Park Center Drive
Alexandria, VA 22302

FNS INSTRUCTION 786-8
REV. 1

ACTION BY: Regional Directors
Special Nutrition Programs

SOURCE CITATION: Sections 210.7 and 220.9

Reimbursement for Off-Site Meal Consumption

This Instruction sets forth the policy with respect to reimbursement of meals consumed off-site under the National School Lunch, Commodity School, and School Breakfast Programs.

The authorizing legislation and program regulations clearly intend that meals reimbursed under the programs are to be served and consumed as part of the school program, on school or school-related premises. Therefore, school meals given to children to take home are not reimbursable. However, meals such as those taken on school supervised field trips may be reimbursed, if they meet the meal pattern requirements and are served and consumed as part of a school related function. These functions must be part of the curriculum, as defined by the State education agency, and not extracurricular events. Meals served off-site should be subject to especially stringent sanitary and precautionary measures to avoid contamination and spoilage.

Exceptional circumstances exist for students who are enrolled in one school but attend another work-study site for the part of the day that includes the meal hour. Those students applying for free or reduced price meals should do so through their home-base school since the home-base school would be more familiar with individual circumstances. The work/study school is responsible for the service of meals and the recordkeeping for meals served and claimed for reimbursement. Therefore, the work/study school should obtain, for its records, a copy of the free and reduced price meal application for and student to whom it serves a free or reduced price meal. When the work/study site does not participate in the programs, take out school meals meeting program requirements may be served to such students and claimed for reimbursement by their home-base school. The provision of such meals is at the option of the school, since school food authorities are only required to make meals available to students who are present during the meal service period.

DISTRIBUTION: 5, 6, 12	MANUAL MAINTENANCE INSTRUCTIONS: Remove FNS Instruction 786-8 from Manual. Insert this Instruction.	RESPONSIBLE FOR PREPARATION AND MAINTENANCE: CND-100	Page 1 6-6-88
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In all cases, care must be taken to ensure that accurate detailed records are maintained, including meal counts for free, reduced price and paid categories.

A handwritten signature in black ink, appearing to read "Sam P. Bauer". The signature is fluid and cursive, with a long horizontal stroke at the end.

SAMUEL P. BAUER
Director
Child Nutrition Division

Dietary Specification Assessment Tool Instructions

REVIEWER INSTRUCTIONS:

When utilizing the Dietary Specifications Assessment Tool, the SA will assess lunch and breakfast food service practices to determine the risk for violations related to calories, saturated fat, sodium, and *trans* fat. The risk-based assessment tool requires both off-site and on-site review elements for lunch and breakfast. When completing the tool, users should exercise their best judgment and select the most appropriate response based on the menu documentation provided, interview of the SFA/site contact and on-site observation.

The reference time period is a typical week during the current school year.

Use the following scoring system:

- 1 - Always (every day or 5 days/week)
- 2 - Most items or most of the time (3-4 days/week)
- 3 - Some items or some of the time (1-2 days/week)
- 4 - Never (0 days/week)

Once all responses are selected, the assessment tool will automatically determine if the site is at risk for dietary specification violations and places the targeted menu review site in one of two categories: high risk or low risk. If the site is high risk, a nutrient analysis is required. If determined low risk, a nutrient analysis may not be required. In all instances, a subsequent on-site visit is required to validate the level of risk and provide the necessary technical assistance.

Dietary Specifications Assessment Tool
(last updated SY17-18)

For each question below, select the number that corresponds to the best description:

- 1 - Always (every day or 5 days/week)
2 - Most items or most of the time (3-4 days/week)
3 - Some items or some of the time (1-2 days/week)
4 - Never (0 days/week)

School Name: [ENTER SCHOOL NAME HERE]	Off-site Review of Documentation/SFA Interview to Determine Risk		On-site Observation to Validate Risk	
	Lunch	Breakfast	Lunch	Breakfast
1. Do BID specifications for menu items and condiments require vendors to provide information on the following?				
a. Saturated fat	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
b. Sodium	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
c. Trans fat	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
2. Only low-fat (1 percent milk fat or less, unflavored) or fat-free (unflavored or flavored) milk is used for student consumption and in menu recipes.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
3. Low-fat, fat-free milk products are used. This includes yogurt and cottage cheese.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
4. Cheese (all varieties including reduced fat) is controlled by placing items in portion cups, portion controlled packaging or the use of appropriate serving size utensils to limit portion size allowed per meal. This includes cheese offered on salad bars.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
5. Are non-creditable cheese products offered as part of a reimbursable meal? (Non-creditable cheese includes: cheese sauce without a CN label, cheese product, imitation cheese and powdered cheese).	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
6. Reduced-fat, low fat, fat-free mayonnaise, sour cream, and/or salad dressings are offered instead of full-fat varieties.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
7. Broths and/or soups with low or reduced sodium are used, rather than regular broths and soups.	-- SELECT VALUE --	N/A	-- SELECT VALUE --	N/A
8. Fresh, frozen, and/or low sodium or no sodium canned vegetables are offered, rather than reduced sodium or regular canned vegetables.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
9. How often are pickles, olives, packaged crackers and/or croutons offered on the service line and/or salad bar?	-- SELECT VALUE --	N/A	-- SELECT VALUE --	N/A
10. How often are meats such as hot dogs, luncheon meats (e.g. ham, turkey) and/or sausage offered on the service line and/or salad bar? (All varieties - including reduced and/or low sodium).	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
11. Canned fruits are packed in water, fruit juice, or light syrup. If only fresh fruit is offered, then select the "Always" (Value = 1) dropdown response.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
12. Grain-based desserts such as doughnuts, pastries, cakes, and cookies are limited to 2 oz. eq. per week or less. If grain-based desserts are not offered, then select the "Always" (Value = 1) dropdown response.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
13. Whole grain-rich foods offered meet the USDA criteria for "whole grain-rich."	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
14. Other seasonings, such as herbs and spices, are substituted for salt.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
15. Oil is used in recipes, rather than shortening, margarine, or butter.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
16. Fat is drained from browned meats and poultry and/or fat is skimmed from broths, soups, stews, or gravies and/or skin is removed from poultry or skinless poultry is used. If browned meats and poultry are not offered, then select the "Always" (Value = 1) dropdown response.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
17. Is a deep fat fryer used on-site to prepare school meal items?	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
18. Is butter or margarine added to breads and/or vegetables prior to serving?	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
19. Standardized recipes are followed: all ingredients are weighed or measured with standardized weight or measuring utensils.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
20. Meal pattern for appropriate age/grade groups are used for menu planning, including the meal patterns and serving sizes. Observe weekly requirements for meats and grains.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
21. How often are extra, non-reimbursable food items (e.g. potato chips, ice cream, pudding and/or gelatin) offered on the menu? Items sold a la carte are exempt.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
22. Portion sizes for condiments (e.g. hot sauce, ketchup, mustard, salad dressing) are controlled by placing items in portion cups, portion-controlled packaging or the use of appropriate serving size utensils to limit portion size allowed per meal.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
23. Food items that may not contribute to reimbursable meal components, such as bacon, bacon bits, pepperoni, and chow mein noodles, are offered on salad bars and/or food bars.	-- SELECT VALUE --	N/A	-- SELECT VALUE --	N/A
24. Students are offered butter or margarine:				
a. In the serving line.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
b. At a condiment station.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
c. If they ask for it.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
25. Students are offered salt:				
a. In the serving line.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
b. At a condiment station.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
c. On meal tables.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
d. If they ask for it.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --
26. Larger portions and/or bonus items and/or seconds are offered (offering portion sizes that are inconsistent with the planned menu). Entrées sold a la carte are exempt.	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --	-- SELECT VALUE --

Indicate the Meals Evaluated: -- SELECT VALUE --

Risk Level:	Indicate Meals Evaluated Indicate Meals Evaluated	Indicate Meals Evaluated Indicate Meals Evaluated
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Nutrient Analysis Checklist

Completion of this checklist is only required when conducting a nutrient analysis.

SFA OR SCHOOL:

1. Is the targeted menu review site in compliance with the meal pattern requirements (meal components and quantities)?

☐ YES

☐ NO

- a. If YES, proceed with conducting a nutrient analysis.

Comments:

2. If required, has the SFA or school implemented corrective action as agreed to during the on-site review to ensure the appropriate source documents are accurate before starting the nutrient analysis process?

☐ YES

☐ NO

☐ N/A

- a. If YES, proceed with conducting a nutrient analysis.
- b. If NO, immediate corrective action is required. Establish a time frame for the school to locate or develop the necessary documentation for the reviewer to perform an accurate nutrient analysis. Conduct analysis once documentation is received.
- c. If documentation is not received by the established date, proceed with noncompliance actions by calling the SFA lead reviewer so funds may be withheld.

Comments:

SOURCE DOCUMENTS REQUIRED FOR ANALYSIS

Review all documentation the SFA provided in support of menus for the menu or nutrient analysis evaluation. Indicate whether the school or SFA provided the following documentation or materials needed to complete the nutrient analysis. Request additional information, if needed.

1. Are the necessary materials available?

☐ YES

☐ NO

- a. Menus: The reviewer should conduct a weighted nutrient analysis based on meals offered for each USDA established age or grade group and menu type offered at lunch and breakfast.

☐ YES

☐ NO



Comments:

- b. Production records include all required information for each age or grade group and menu type.

☐ YES

☐ NO

Production records (including salad bar or theme bar production records) must list all food or menu items offered as part of the reimbursable meal. Additional items such as condiments, gelatin, or butter, must also be included. Portion sizes, total food quantity used to prepare each menu item or food item, and leftovers must be recorded.

Comments:

- c. Number of a la carte sales, adult, and "other" meals differentiated on production records.

☐ YES

☐ NO

If the same food items are used for reimbursable meals, a la carte sales and/or "other" meals (e.g., adult meals, meals for special diets), production records differentiate the number of menu items planned for each type of meal, or for a la carte sales.

Comments:

- d. Standardized recipes include preparation instructions, portion sizes and yield used in the menus for the period of evaluation.

☐ YES

☐ NO

Comments:

- e. Nutrition information is available for commercially prepared foods (e.g., Nutrition Facts Labels or Manufacture's Data Submission Forms).

☐ YES

☐ NO

Comments:



- f. Food product descriptions or specifications indicate the specific form of the foods used (e.g., canned in light syrup, frozen, no added salt, 1% low-fat milk etc.).

☐ YES

☐ NO

Comments:

- g. Crediting Information is available.

☐ YES

☐ NO

CN labels are useful because they give information on creditable food items for identifying a food-based reimbursable meal and help to identify specific commercially prepared foods in the CN Database. However, Child Nutrition labels do not provide nutrient information for data input when conducting a nutrient analysis.

Comments: