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School Meals Initiative

Review

Background of the School Meals Initiative (SMI)

SMI is often used as an abbreviation for all of the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) regulations and policies that address the nutrition standards for school meals. These SMI regulations augment the statutory nutrition requirements for the NSLP and the SBP and provide school food authorities (SFAs) with a variety of alternatives for planning menus. In addition, SMI encompasses actions to support the Texas Department of Agriculture (TDA) and SFAs in improving school meals and encouraging children to improve their overall diets. These actions include training Child Nutrition Program personnel to serve healthy meals and teaching children to make healthy dietary choices.

The United States Department of Agriculture (USDA) issued the final *School Meals Initiative for Healthy Children* regulations in 1995 after the passage of the *Healthy Meals for Healthy Americans Act of 1994*, which requires that meals under the NSLP and SBP meet the *1995 Dietary Guidelines for Americans*. The SMI regulations define how the *1995 Dietary Guidelines for Americans* are applied to school meals.

Preparing for an SMI Review

Each SFA will be scheduled for an SMI review at least once every five years. The SMI reviewer will inform the SFA in advance when the review is scheduled. This notification will include:

- Which school(s) will be selected;
- What week will be selected for review;
- When an on-site visit will be scheduled; and
- What specific information you will need to provide.

How Does the SMI Review Compare to a Coordinated Review Effort (CRE) Review?

The CRE review focuses on the administrative aspect of school foodservice operations. The SMI Review focuses on the nutritional standards. TDA is required to conduct CRE and SMI reviews of each SFA participating in the NSLP once every five years. The SMI Review may be conducted before, during or after the CRE Review.

CRE Review Goals

- To determine if free and reduced-price meal benefits are provided in accordance with the regulations;

- To determine if proper meal counts are being taken at the point of service; and
- To determine if complete reimbursable meals are being offered.

SMI Review Goals

- To ensure program meals meet the regulated nutrition standards
- To ensure meals are reimbursable;
- To ensure that SFAs receive the technical assistance and resources needed to meet the nutrition standards; and
- To ensure the *1995 Dietary Guidelines for Americans* are met.

SMI Review Areas

The following areas are looked at during an SMI Review:

- Nutrient content of meals (nutrient analysis);
- On-site menu documentation (occurs during the on-site review);
- Evaluation of planned menu;
- Nutrition education and policies; and
- Food safety and sanitation.

Preparing for the SMI Review

Below is a summary of the information that an SFA will need to have available when the SMI review is scheduled. These documents may be requested prior to the on-site visit. Have all required information organized and readily available.

The SMI reviewer will provide a more detailed checklist of documents needed for the SMI review.

Menus

Complete written menus are required to ensure accuracy of the nutrient analysis. A copy of the menus planned and served for each of the school(s) selected for the review must be provided. Menus should include all choices, including condiments and other items not included as a meal component, such as desserts. Please include all substitutions made, if following a nutrient-based menu planning system, and note the specific substitution and the date the substitution was made.

Standardized Recipes

The SFA must provide copies of all recipes used during the review week.

- **For a nutrient-based menu planning approach**, TDA will use the SFA's recipes to ensure they were correctly entered into the nutrient analysis software program, including selecting the correct ingredient and weight or volume.

- **For a food-based menu planning approach**, TDA will use the SFA's recipes to conduct the nutrient analysis. For the SFAs conducting their own analysis and wanting TDA to accept their analysis, TDA will validate the data entry of the ingredients, recipes and menus for accuracy.

The procedures for standardizing recipes are described in Chapter 7 of USDA's *A Menu Planner for Healthy School Meals*, which can be found on the Team Nutrition website at <http://teamnnutrition.usda.gov/Resources/menuplanner.html>. This resource describes in detail the importance of standardized recipes to ensure consistent results for both nutritional analysis and product quality and yield. It gives a clear description of the procedures by which local recipes can be standardized for use in the program. It also contains a copy of a standardized recipe form. SFAs should check their recipes against this form to ensure that all needed information is included on their recipes.

Another resource is *Measuring Success with Standardized Recipes, 2002*, which can be found on the National Food Service Management Institute's website at <http://www.olemiss.edu/depts/nfsmi/Information/measuring-success.html>. This resource assists school foodservice managers and employees in understanding the importance of standardized recipes and helps managers develop standardized recipes for use in their school foodservice. It contains several helpful examples, exercises and reference materials.

Food Production Records

Food production records, the documentation of what was prepared and served, are necessary to support the claim for reimbursable meals and to identify information needed for the nutrient analysis.

Regardless of the type of menu planning option chosen, all production records must include the following information.

- Planned number of meals by age or grade group for students;
- All planned menu items, including all choices, types of milk, substitutions and non-creditable items such as desserts and condiments.
- All condiments served as part of the reimbursable meal, including gravy, butter, margarine, mayonnaise, relish, ketchup, mustard, salad dressing, etc.
- Serving or portion sizes of each planned menu item or condiment for each age or grade grouping.
- If menus are planned for more than one age or grade group at one school building, clearly indicate portion differences on food production records.
- Planned number of portions (servings) of each menu or food item to be served; include planned a la carte sales in the planned portions.
- Total amount of food actually prepared for each food item or menu item (for on-site SMI Review).
- Amount of leftovers for each menu item (for on-site SMI Review).

- Actual number of reimbursable meals served. Indicate this information for each age or grade group (for on-site SMI Review).
- Actual number of non-reimbursable meals (adult meals, second meals served to students and a la carte meals) (for on-site SMI Review).

Food Product Descriptions or Specifications

The SFA should have written food product descriptions or specifications for all foods — not only as a purchasing tool but also for determining the product or ingredient for the nutrient analysis or the review of the analysis.

Examples of Food Product Descriptions:

Ground beef, frozen

No more than 20% fat

Like IMPS 136

Milk, unflavored, 1% lowfat

SFAs that utilize procurement software can usually provide a printout of food product descriptions for each food product. This allows the SFA menu planner or SMI reviewer to select the correct ingredient from the software database when conducting nutrient analysis.

Nutrition Information

Nutrition information for all commercially prepared items must be on file — regardless of the menu planning approach. Be sure all copies of these documents can be easily read. The SMI reviewer or menu planner must be able to identify which nutrient information belongs to which product.

If a Nutrition Facts Label is not available, that information must be obtained from the manufacturer.

Child Nutrition (CN) Labels and/or Product Analysis Sheets or Product Formulation Statements

CN Labels and/or product formulation statements must be available to identify the component contribution of a product toward the meal pattern – for schools on a food-based menu planning system.

Nutrient Analysis Report for the Review Week

- **For a nutrient-based menu planning approach**, provide a nutrient analysis report for the review week.
- **For a food based menu planning approach**, schools conducting their own nutrient analysis and wanting TDA to accept it must provide a nutrient analysis report for the review week. The analysis must follow the procedures described in the *Nutrient Analysis Protocols: How to*

Analyze Menus for USDA's School Meals Programs, and they must meet the following criteria: weighted analysis with no option to combine breakfast and lunch.

The *Nutrient Analysis Protocols: How to Analyze Menus for USDA's School Meals Programs* can be found on the USDA Food and Nutrition Services (FNS) website at <http://www.fns.usda.gov/tn/resources/nutrientanalysis.html>. Otherwise, the SMI reviewer will conduct the nutrient analysis for the week of review.

The SMI Review Process — What to Expect

The process to conduct an SMI review has been separated by food based and nutrient standard based planning since there are some differences in how the review will be conducted.

Food Based Menu Planning Approaches

The SMI reviewer will conduct a nutrient analysis for schools using Traditional or Enhanced Food Based Menu Planning. If the SFA uses a food-based menu planning approach, conducts its own nutrient analyses, the SFA has the option to request for their nutrient analysis to be used for the SMI Review. The SMI reviewer will then follow the SMI review guidelines for validating the nutrients analysis. (as long as the analyses use weighted averaging and breakfast and lunch are not combined).

The SMI reviewer may ask that documentation required for a nutrient analysis be sent to them prior to the review and will advise the SFA on the procedure to be used.

An on-site evaluation of at least one school is usually made during the review process to determine if the recorded information and daily practices are consistent, in order to complete the nutrient analysis. Based on the results of the nutrient analysis, on-site evaluation and comparison to the last SMI review in the SFA, recommendations for corrective action will be developed to bring the menus and daily practices into compliance with nutrition standards.

Nutrient Standard Menu Planning (NSMP) and Assisted Nutrient Standard Menu Planning (ANSMP)

If an SFA or one of its schools uses one of the nutrient based menu planning approaches, all the information listed in this chapter plus the completed nutrient analysis report must be provided. Product descriptions, documentation of product nutrient information, standardized recipes and production records will be used to compare the information used for the menu analysis. All records and information explained in this chapter are necessary in order for the SMI reviewer to check the accuracy of all data and to provide technical assistance if the analysis contains errors or omissions.

An on-site evaluation of at least one school will usually be made to determine if the recorded information and daily practices are consistent in order to validate the nutrient analysis. Based on the results of the nutrient analysis, on-site evaluation and comparison to the last SMI review

in the SFA, recommendations will be developed so the menus and daily practices meet the nutrient standards.

After the SMI Review

After the review is completed, the SMI reviewer will analyze the results of the review to determine how closely the NSLP is meeting the *1995 Dietary Guidelines for Americans* and if schools are improving in efforts to meet the nutrition goals. They will also provide the results of that review to the SFA.

Depending on the results of the review, the SMI reviewer and TDA may make suggestions and/or assist the SFA in developing a Corrective Action Plan (CAP). The suggestions and/or corrective actions will be developed with the SFA's program needs in mind. The SMI reviewer will discuss all requirements regarding activities and suggestions for corrective action at the time of the exit conference, following the review.

Meet Nutrition Goals

The objective of all five menu planning systems is to meet the SMI's nutrition goals:

- Recommended Dietary Allowances (RDA)
 - ¼ RDA for Breakfast
 - ⅓ RDA for Lunch
- Calorie Goals
 - Age appropriate
- *1995 Dietary Guidelines for Americans*
 - Balanced nutrient content
 - Variety of foods

The Nutrient Standards are set for the five menu planning systems — Traditional Food Based Menu Planning, Enhanced Food Based Menu Planning, Nutrient Standard Menu Planning (NSMP), Assisted Nutrient Standard Menu Planning (ANSMP) and any Alternate Approach — are based on the required level of calories, nutrients and dietary components and by weighting and averaging the RDA for a specific age or grade group. Planned and offered breakfast and/or lunch menus averaged over a week should meet the Nutrient Standard of the age or grade group for which they are intended. Meeting these standards is the goal for all five menu planning systems. Menus may exceed nutrient levels in the grade/age appropriate group (with the exception of nutrient levels for total fat and saturated fat, which are maximums based on the total calories planned).

Calories and Nutrients in the Nutrient Standards

Standards are set for:

- Calories;
- 30 percent or less calories from fat;
- Less than 10 percent calories from saturated fat;
- Protein;

- Calcium;
- Iron;
- Vitamin A; and
- Vitamin C.

Other nutrients and dietary components analyzed are carbohydrate, cholesterol, sodium and dietary fiber. While there are no quantity standards set for these dietary components, they must be included in the analysis except carbohydrate, which is optional. They will be surveyed over time to check on the implementation of the *1995 Dietary Guidelines for Americans* to determine whether:

- The carbohydrate level is increasing.
- Cholesterol and sodium levels are decreasing.
- The dietary fiber level is increasing.

For more detailed information concerning planning healthy school meals, refer to *A Menu Planner for Healthy School Meals*. If the SFA does not have a copy of this resource, contact the regional ESC CNP Specialist. This resource may also be accessed on the Team Nutrition website at <http://teamnnutrition.usda.gov/Resources/menuplanner.html>.

Nutrient Standards: Food Based Menu Planning

For Food Based Menu Planning, the nutrient standards are designed to reflect the differing nutrient and calorie needs of younger and older children while also accommodating the grade structure of the majority of schools.

Traditional Meal Pattern:

Lunch

Established Grade Groups

Preschool

Grades K-3

Grades 4-12

Optional Grades 7-12

Enhanced Meal Pattern:

Lunch

Established Grade Groups

Preschool

Grades K-6

Grades 7-12

Optional Grades K-3

Traditional and Enhanced Meal Patterns:

Breakfast

Established Grade Groups

Preschool

Grades K-12

Optional Grades 7-12 for Enhanced Food-Based Menu Planning.

Using the Established Grade Groups

For Food Based Menu Planning, the nutrient standards have been established for the meal patterns. SFAs may not customize the grade grouping or the nutrient standards when using the Food Based Menu Planning approach but may use an approved modification to age/grade groupings. USDA-approved modifications for the Traditional and Enhanced Food Based Menu Planning approaches follow.

Note: Neither the menu planner nor the SMI reviewer can customize grade groups or nutrient standards for the grades when using the Food Based Menu Planning approach.

Menus must be analyzed according to the grade group(s) used by the SFA for menu planning – not by the grades in the review school.

Modification for the Majority of the Children – Traditional and Enhanced Food Based Menu Planning

- **If only one age/grade** is outside the established levels of the grade grouping, an SFA may use one or two age/grade groups and nutrient standards for the majority of the children.

Example: A school has grades K-4. Only one grade (4) is outside the established grade group of Grades K-3. Since the majority of the children are in Grades K-3, the school may use the meal pattern portion sizes and nutrient standards for Grades K-3 to plan menus for students in Grades K-4.

- **If more than one age/grade group** is outside the established levels of the grade grouping, an SFA must use two age/grade groups and nutrient standards. However, the school always has the option of serving Group IV (Grades 4-12) for all students in the school under the Traditional Menu Planning approach. Although regulations allow this, from a nutritional perspective it is not advised. The broader the range of age/grade groups, the more likely younger children will receive more calories than needed and older children will receive insufficient calories and nutrients.

Modification for Portion Sizes and Nutrient Levels – Traditional Food Based Menu Planning

Schools using the Traditional Food Based Menu Planning approach may:

1. Use the portion sizes for the meal pattern for Grades 4-12 for children in Grades K-6, and follow the nutrient standards for children in Grades K-6.

- Use the portion sizes for the meal pattern for Grades 4-12 for children in Grades 7-12, and follow the nutrient standards for children in Grades 7-12.

Nutrient Standards: NSMP and Assisted NSMP

For NSMP and Assisted NSMP (ANSMP), the menu planner, at a minimum, must use established nutrient standards for grade groupings. However, the menu planner may use the established optional age levels or may customize the age groups to fit the grade groupings of the SFA/school. The menu planner must use more than one group for a K-12 building, so the planner cannot simply customize one age group for a K-12 school.

Lunch and Breakfast

Customized Age Groups (Optional)

The option to customize age groups allows the menu planner to develop menus that are more accurately targeted to the nutritional needs of specific groups of children. Refer to the age-to-grade comparison chart on the next page.

Schools can create their own customized age groupings and nutrient standards to match the grade structures of the school(s). The menu planner must use more than one group for a K-12 building, so the planner would not simply customize for the grade groupings to fit the school in this case.

Age to Grade Comparison Chart	
Age	Grade
5	K
6	1
7	2
8	3
9	4
10	5
11	6
12	7
13	8
14	9
15	10
16	11
17	12

For example, schools within an SFA, using NSMP/ANSMP, are divided as follows:

- Preschool and kindergarten (Pre-K to K),
- Elementary (Grades 1-6),
- Junior high school (Grades 7-9), and
- High school (Grades 10-12).

The SFA can customize age groups as follows:

- Pre-K to K: Create nutrient standards for ages 3 through 5
- Grades 1-6: Create nutrient standards for ages 6 through 11
- Grades 7-9: Create nutrient standards for ages 12 through 14
- Grades 10-12: Create nutrient standards for ages 15 through 17.

USDA-approved software will calculate the nutrient standards for breakfast and lunch for the customized age groups. By customizing these standards, the menu planner can better meet the nutrient needs of students.

Note: In NSMP/ANSMP, the menu planner must use at least two grade or age groups when planning lunches for students in Grades K-12.

Required Minimum Calorie and Nutrient Levels for Enhanced Food Based, Traditional Food Based and Nutrient Standard Menu Planning Systems for School Breakfasts by Grade Levels
(School Week Averages: Minimum of three consecutive days and a maximum of seven consecutive days)

Nutrients and Energy Allowances	Preschool	Grades K-12	Option for Grades 7-12
Energy Allowances/Calories	388	554	618
Total Fat (as a percentage of actual food energy)	(1)	(1, 2)	(2)
Total Saturated Fat (as a percentage of actual total food energy)	(1)	(1, 3)	(3)
RDA for Protein (g)	5	10	12
RDA for Calcium (mg)	200	257	300
RDA for Iron (mg)	2.5	3.0	3.4
RDA for Vitamin A (RE)	113	197	225
RDA for Vitamin A (IU)	565	985	1125
RDA for Vitamin C (mg)	11	13	14

¹ The Dietary Guidelines for Americans recommend that after 2 years of age "...children should gradually adopt a diet that, by about 5 years of age, contains no more than 30 percent of calories from fat."

² Not to exceed 30 percent over a school week.

³ Less than 10 percent over a school week.

Required Minimum Calorie and Nutrient Levels for Enhanced Food Based and Nutrient Standard Menu Planning Systems for School Lunches by Grade Levels
(School Week Averages: Minimum of three consecutive days and a maximum of seven consecutive days)

Nutrients and Energy Allowances	Minimum Requirements			Optional
	Preschool	Grades K-6	Grades 7-12	Grades K-3
Energy Allowances/Calories	517	664	825	633
Total Fat (as a percent of actual total food energy)	(1)	(1,2)	(2)	(1,2)
Total Saturated Fat (as a percentage of actual total food energy)	(1)	(1,3)	(3)	(1,3)
RDA for Protein (g)	7	10	16	9
RDA for Calcium (mg)	267	286	400	267
RDA for Iron (mg)	3.3	3.5	4.5	3.3
RDA for Vitamin A (RE)	150	224	300	200
RDA for Vitamin A (IU)	750	1120	1500	1000
RDA for Vitamin C (mg)	14	15	18	15

¹ The Dietary Guidelines for Americans recommend that after 2 years of age "...children should gradually adopt a diet that, by about 5 years of age, contains no more than 30 percent of calories from fat."

² Not to exceed 30 percent over a school week.

³ Less than 10 percent over a school week.

Required Minimum Calorie and Nutrient Levels for Traditional Food Based System for School Lunches by Grade Levels (School Week Averages)

Nutrients and Energy Allowances	Minimum Requirements			Optional
	Preschool	Grades K-3	Grades 4-12	Grades 7-12
Energy Allowances/Calories	517	633	785	825
Total Fat (as a percent of actual total food energy)	(1)	(1,2)	(2)	(2)
Total Saturated Fat (as a percentage of actual total food energy)	(1)	(1,3)	(3)	(3)
RDA for Protein (g)	7	9	15	16
RDA for Calcium (mg)	267	267	370	400
RDA for Iron (mg)	3.3	3.3	4.2	4.5
RDA for Vitamin A (RE)	150	200	285	300
RDA for Vitamin A (IU)	750	1000	1425	1500
RDA for Vitamin C (mg)	14	15	17	18

¹ The Dietary Guidelines for Americans recommend that after 2 years of age "...children should gradually adopt a diet that, by about 5 years of age, contains no more than 30 percent of calories from fat."

² Not to exceed 30 percent over a school week.

³ Less than 10 percent over a school week.

**Optional Minimum Calorie and Nutrient Levels for School Lunches
Nutrient Standard Menu Planning Approaches (School Week Averages)**

Nutrients and Energy Allowances	Ages 3-6	Ages 7-10	Ages 11-13	Ages 14 and Above
Energy Allowances/Calories	558	667	783	846
Total Fat (as a percent of actual total food energy)	(1,2)	(2)	(2)	(2)
Total Saturated Fat (as a percentage of actual total food energy)	(1,3)	(3)	(3)	(3)
RDA for Protein (g)	7.3	9.3	15.0	16.7
RDA for Calcium (mg)	267	267	400	400
RDA for Iron (mg)	3.3	3.3	4.5	4.5
RDA for Vitamin A (RE)	158	233	300	300
RDA for Vitamin A (IU)	790	1165	1500	1500
RDA for Vitamin C (mg)	14.6	15	16.7	19.2

¹ The Dietary Guidelines for Americans recommend that after 2 years of age "...children should gradually adopt a diet that, by about 5 years of age, contains no more than 30 percent of calories from fat."

² Not to exceed 30 percent over a school week.

³ Less than 10 percent over a school week.

Modifications of Nutrient Standards for the Majority of Children — For NSMP/ANSMP

Not all schools' grade structures will match the nutrient standard for the established grade or age groups.

- If only one age/grade is outside the established levels, an SFA may use the nutrient standard levels for the majority of children.
- When more than one grade or age is outside of the established levels, the menu planner must use two grade or age groups.

Examples

Grade groupings for Lunch:

- May use one grade group to plan meals for:
 - Grades K-4 may use K-3
 - Grades 6-9 may use 7-12
- At a minimum, use two grade groups to plan meals for:
 - Grades K-8 Use K-6 and 7-12

Improvement Ideas for School Meals

These practice-based activities can assist SFAs in planning meals to meet the goals of the SMI. These activities can lower fat and saturated fat and increase iron, calcium, vitamin A and vitamin C. When calories from fat are lowered, the total calories for the meal are also lowered. Ideas for increasing calories with more nutritious foods are also included.

Increase Calcium

- Offer low-fat or nonfat plain or fruit yogurt as an entree choice.
- Provide a variety of dairy products acceptable to students such as cottage cheese, low-fat cheeses and calcium-fortified juices.
- Add nonfat powdered milk to homemade bread, rolls and instant potatoes.

Increase Calories

- Increase portion sizes.
- Increase number of servings of breads, pasta, rice and other grain products.
- Offer fruited gelatin made with fruit juice, low-fat frozen yogurt, gingerbread or crispy rice treats for dessert.
- Offer condiments such as honey, jelly, syrup, fruit toppings, and low-fat gravy.
- Serve vegetables such as potatoes or corn along with low calorie vegetables like carrots or broccoli.
- Offer 1% chocolate milk daily.

Improve Iron Intakes

- Increase servings of cereals at breakfast.
- Increase servings of enriched or whole grain bread and pasta products at lunch.
- Serve foods higher in iron like lean meat, dry beans and peas, green and wax beans, broccoli, dried fruits, sweet potatoes and dark green leafy vegetables.

Easy Ways to Lower Fat in Meals

- Request and purchase lower fat convenience foods.
- Purchase leaner cuts of meat.
- Offer an entree that includes cooked beans once per week.
- Offer other vegetarian entrees.
- Purchase soy-extended meat products.
- Offer larger portions or seconds of breads, grains and pasta and fruits.
- Season vegetables with herbs and spices instead of adding fat.

Easy Ways to Lower Saturated Fat in Meals

- Limit products high in saturated fat, like butter, peanut butter, high fat cheeses and meats.
- Limit processed foods high in coconut or palm oil.
- Modify recipes to include vegetable oil instead of butter, margarine and solid shortening.
- Use fat free milk instead of whole milk.

Increasing Vitamin A and C

Foods High in Vitamin A

- Yellow and orange fruits and vegetables, broccoli, tomato products and purple plums

Foods High in Vitamin C

- Citrus fruits, broccoli, sweet red and green peppers, papaya, guava, mango, pineapple and strawberries

SMI Regulatory Requirements

Compliance with the nutritional requirements is the basis for the service of reimbursable meals and also the basis for TDA's assessment.

USDA FNS has developed prototype forms and guidance for TDA's use. FNS also provides policy oversight in the form of memoranda, questions and answers and guidance materials. The regulations, policy memoranda and guidance materials together constitute FNS's requirements, expectations and assumptions for SMI reviews.

General SMI Requirements and Definitions

Meeting the nutrition standards: For children age two and older, under any menu planning approach, schools must offer, at a minimum, meals that contain calorie and nutrient levels appropriate to the age/grade group(s) served, plus applicable recommendations of the 1995

Dietary Guidelines for Americans.

Timeframe: The nutrition standards and calories and nutrients must be met over a school week.

School Week: A minimum of three consecutive school days and a maximum of seven consecutive school days. Weeks with less than three days shall be combined with the previous or subsequent week. For purposes of the SMI review, the compliance evaluation for the nutrition standards shall be conducted on the menu for any week of the current school year in which such evaluation is conducted. The week selected must continue to represent the current menu planning approach(es).

Lunch: A meal that meets the nutrition standards and appropriate nutrient and calorie levels. In addition, for the food based menu planning approaches, a lunch shall meet the food component and item requirements by age/grade groupings.

Breakfast: A meal that meets the nutrition standards, appropriate nutrient and calorie levels, and is served in the morning hours, at or close to the beginning of the school day.

Records: Schools must maintain the appropriate records for their menu planning system. For all schools, production and menu records are required to include sufficient information to evaluate the menus' contributions to meeting the nutrition standards. In addition, schools using NSMP or ANSMP must maintain their nutrient analysis records to demonstrate compliance with the nutrition standards.

Combining the analysis: Schools using NSMP/ANSMP may combine the nutrient analysis of lunches and breakfasts proportionately to the levels of participation in each program. *Nutrient Analysis Protocols for the School Meals Programs* contains guidance on combining breakfast and lunch.

Recommended Dietary Allowances for lunch: Lunches must provide one-third of the RDA for protein, calcium, iron, vitamin A and vitamin C based on the appropriate age or grade group.

Recommended Dietary Allowances for breakfast: Breakfasts must provide one-fourth of the RDA for protein, calcium, iron, vitamin A and vitamin C based on the appropriate age or grade group.

Lunchtime energy allowances: Lunches must provide one-third of the Recommended Energy Intake based on the appropriate age or grade group.

Breakfast energy allowances: Breakfasts must provide one-fourth of the Recommended Energy Intake based on the appropriate age and grade group.

1995 Dietary Guidelines for Americans: Provide the basis for federal nutrition policy and nutrition education activities. These guidelines are revised every five years; the version to use will be specified in regulations.

The applicable recommendations are:

- Eat a variety of foods;
- Limit total fat to 30 percent of calories;
- Limit saturated fat to less than 10 percent of calories;
- Choose a diet low in cholesterol;
- Choose a diet with plenty of grain products, vegetables and fruits;
- Choose a diet moderate in salt and sodium; and
- Choose a diet moderate in sugars.

The measurable recommendations are:

- A limit on the percent of calories from total fat to 30 percent based on the actual number calories offered;
- A limit on the percent of calories from saturated fat to less than 10 percent based on the actual number of calories offered;
- A reduction of the levels of sodium and cholesterol; and
- An increase in the levels of dietary fiber.

Food Based Menu Planning Requirements

Food Component: One of the four food categories that comprise reimbursable meals planned under a food-based menu planning approach. The four food components are meat or meat alternate, milk, grains/breads and fruits/vegetables.

Food item: One of the five required foods offered in lunches under a food based menu planning approach: meat/meat alternate, milk, grains/breads and two different servings of fruits/vegetables; one of two required foods or combinations of foods offered in breakfasts under a food based menu planning approach from the four food components.

Lunch age/grade groups for Traditional Food Based: There are four age/grade groups established for the Traditional Food Based Menu Planning approach: Preschool (ages 1-2 and 3-4), Grades K-3, and Grades 4-12. These age/grade groupings are minimum requirements and are used both for the nutrition standards and for the meal pattern. There is also an optional age/grade group for Grades 7-12.

Lunch age/grade groups for Enhanced Food Based: There are three age/grade groups established for the enhanced food-based menu planning approach: Ages 1-2, Preschool, Grades K-6 and Grades 7-12. These grade groupings are minimum requirements and are used both for the nutrition standards and for the meal pattern. There is also an optional grade group for Grades K-3.

Breakfast age/grade groups for Enhanced Food Based: There are three age/grade groups established for the Enhanced Food-Based Menu Planning approach: Ages 1-2, Preschool and Grades K-12. These grade groupings are minimum requirements and are used both for the nutrition standards and for the meal pattern. There is also an optional grade group for Grades 7-12.

Breakfast age-grade groups for Traditional Based Food: There are three established age/grade groups for the Traditional Food Based Menu Planning approach for breakfast: Ages 1-2, Ages 3, 4, 5 and Grades K-12. These age/grade groupings are minimum requirements and are used both for the nutrition standards and for the meal pattern.

Meal Patterns: For both the Enhanced and Traditional Food Based Menu Planning approaches, there are specific food components (meat/meat alternate, vegetables/fruits, grains/breads and milk) that must be served. There are separate patterns for lunches and for breakfasts in each of the food-based menu planning approaches.

Modifications available for food based menu planning approaches: There are three modifications available to schools using one of the food-based menu planning approaches for lunches: 1) meat/meat alternate modification; 2) modification to age/grade groups (Traditional only) and 3) modification for the majority of children.

Modification to the meat/meat alternate component: For either of the food-based menu planning approaches, the required minimum quantities of the meat/meat alternate component may be offered as a weekly total with a one-ounce (or its equivalent for certain meat alternates) minimum daily serving size.

Modification to age/grade groups under the Traditional Food Based Planning Approach for lunches: For children in grades K-6, use the portion sizes in Group IV (grades 4-12) and follow the nutrient levels for children in grades K-6 for the Enhanced Food-Based Menu Planning Approach.

Modification for the majority of children: For either of the food based menu planning approaches, if only one age or grade is outside the established levels, schools may follow the levels for the majority of children for both quantities and the nutrition standards.

Vegetable and fruit component for the Enhanced Food Based Menu Planning Approach for lunches: For children in kindergarten through grade six, the requirement for this component is based on minimum daily servings *plus* total servings over a five-day period. The size servings for biscuits, rolls, muffins and other grain/bread varieties are specified in the *Food Buying Guide* and FNS instructions.

Grain-based dessert for Enhanced Food Based Menu Planning Approach for lunches: Under Enhanced Food Based Menu Planning, one serving per day of the grain/bread component may be a dessert.

Offer versus serve (OVS) for Food Based Menu Planning Approach for lunches: Under the food based menu planning approaches, a school must offer all five required food items (meat/meat alternate, grains/breads, two servings of different vegetables and/or fruit, and fluid milk). Senior high students shall be permitted to decline up to two of the five required food items. At the discretion of the school district, students below the senior high level may be permitted to decline one or two of the required five food items.

Offer versus serve (OVS) for Food Based Menu Planning Approach for breakfasts: Under the food based approaches for the breakfast program, OVS is optional and schools may allow students to refuse one food item from any component.

Nutrient Standard Menu Planning and Assisted Nutrient Standard Menu Planning Requirements

Nutrient Standard Menu Planning (NSMP)/Assisted Nutrient Standard Menu Planning (ANSMP): Schools may develop menus using USDA-approved computer software to analyze nutrient content for all menu items and foods offered over a school week. Menus are evaluated and modified as needed to ensure they meet specific calories, calories from fat and nutrient levels. The SFA conducts the analysis based on weighted (or simple) averages. For schools using ANSMP, another entity completes the menu planning and analysis and incorporates the production quantities needed to accommodate the specific service requirements. The software computes a weekly average for calories and for each of the following nutrients: protein, vitamin A; vitamin C; iron; calcium; total fat; saturated fat. The analysis also includes the dietary components of cholesterol, sodium and dietary fiber.

Menu item: Under NSMP or ANSMP, any single food or combination of foods. All menu items or foods offered as part of the reimbursable meal may contribute toward meeting the nutrition standards, *except for* those foods that are considered as foods of minimal nutritional value (FMNV), unless the FMNV is offered as part of a menu item in a reimbursable meal.

Entrée: A combination of foods or a single food item that is offered as the main course.

Lunch age/grade groups for NSMP/ANSMP: The age/grade groups established for NSMP/ANSMP provide minimum levels of the required nutrients and calories. There are three grade groups established for NSMP/ANSMP: Preschool, Grades K-6, and Grades 7-12. These grade groupings are minimum requirements. There is also an optional grade group for Grades K-3. Schools may also offer meals to children using the following established age groups: Ages 3-6, Ages 7-10, Ages 11-13, and Age 14 and above. Schools may also customize their own age groups and their corresponding nutrient and calorie levels.

Modification for the majority of children available to NSMP/ANSMP approaches: If only one grade or age group is outside the established levels, schools may follow the levels for the majority of the children.

Reimbursable lunch: A reimbursable lunch must be planned with enough menu items to meet nutritional goals, with a minimum of three menu items: entrée, side dish, and fluid milk. Under Offer versus Serve, a student shall select, at a *minimum*, an entrée and one other menu item. If more than three items are offered, the student may decline up to two menu items; however, the entrée cannot be declined.

Reimbursable breakfast: A reimbursable breakfast must be planned with enough menu items to meet nutrition goals, with a minimum of three menu items, one of which must be fluid milk.

Offer versus Serve (OVS) for NSMP/ANSMP lunches: Under OVS, a school must offer a minimum of three menu items. Senior high students must select at least two menu items and may decline a maximum of two menu items; one menu item selected must be an entrée. If more than three menu items are offered, the student may decline up to two menu items; however the entrée cannot be declined. At the discretion of the district, students below the senior high level may also participate in OVS.

Offer versus Serve (OVS) for NSMP/ANSMP breakfasts: Under the optional OVS for the SBP, regardless of the number of menu items offered, a maximum of one menu item can be declined.

Nutrient Analysis: Schools using nutrient standard menu planning must conduct the analysis on all menu items and foods offered in a reimbursable lunch. The analysis is conducted over a school week. Unless offered as part of a menu item in a reimbursable lunch, FMNV are not included in the analysis.

Child Nutrition (CN) Database: The CN Database is a required part of all USDA approved software programs for conducting nutrient analysis.

Software: Any software used to conduct nutrient analysis must be evaluated by FNS or by FNS' designee beforehand and, as submitted, has been determined to meet the minimum requirements established by FNS. The software must perform all functions required by FNS including calculation of weighted averages and the optional combining of analysis of the NSLP and SBP. Refer to Section 8, Breakfast and Section 9, Lunch, for a list of the USDA-Approved Software.

Weighted average: For nutrient analysis, menu or food items are weighted based on their proportionate contribution to the meals offered. This means that menu or food items more frequently selected are weighted more heavily than those not selected as frequently. Public Law 108-265 (June 30, 2004) amended section 9(f)(5) of the Richard B. Russell National School Lunch Act by extending the waiver of the requirement to conduct weighted averages through September 30, 2009.

Simple Average: Simple averaging is an alternate method for projecting the numbers of each menu or food item, in contrast to weighted averages, which gives more weight to nutrients that are more frequently selected by students. For nutrient analysis, simple averaging means giving equal weight to every item offered to the student within each menu choice. In cases where students have the option of selecting more than one item from a group of choices, the menu planner must choose a number for the projected number of planned meals that is evenly divisible by the number of menu item selections available within all of the menu choice groupings. This method cannot be used after September 30, 2009.

Results of nutrient analysis: The computed nutrient analysis average for the school week for each age/grade group, as compared with the appropriate nutrient and calorie levels.

Adjustments to menus: Once schools know the results of the nutrient analysis, they must adjust menus to meet the nutrition standards, prior to the service of the meals. Schools need to re-analyze menus when the students' selections change and, consequently, production levels change. Schools may need to change the menu items and foods offered given the students' selections and may need to modify the recipes and other specifications to make sure that the nutrient standards are met.

Standard recipes: Schools using the NSMP must develop and follow standardized recipes. A standardized recipe is one that was tested to provide an established yield and quantity through the use of ingredients that remain constant in both measurement and preparation methods. USDA/FNS standardized recipes are included in the CN Database. In addition, local standardized recipes used by SFAs must be analyzed for their calories, nutrients and dietary components and added to the local databases by SFAs in accordance with guidance provided by FNS.

Commercially prepared or processed foods: Any locally purchased processed foods that are not included in the CN Database must be entered. The calories, nutrients and dietary components of purchased processed foods and menu items used in planned menus must be obtained by the SFA and incorporated into the database at the local level in accordance with the FNS guidance, *Nutrient Analysis Protocols for the School Meals Programs*.

Menu substitutions: If the need for serving a substitute food(s) or menu item(s) occurs at least two weeks prior to serving the planned menu, the revised menu shall be reanalyzed based on the changes. If the need for serving a substitute food(s) or menu item(s) occurs two weeks or less prior to serving the planned menu, no reanalysis is required. However, to the extent possible, substitutions should be made using similar foods.

Meeting the nutrition standards: If the nutrient analysis conducted by the SFA shows that the menus offered are not meeting the nutrition standards and the appropriate levels of nutrients

and calories, actions must be taken by the SFA to modify the menus, prior to meal service, to ensure that the meals offered to children comply with the nutrition standards and the appropriate levels of nutrients and calories.

Other Child Nutrition Programs: Any SFA that operates the Summer Food Service Program (SFSP) and/or the Child and Adult Care Food Program (CACFP) may, at its option and with TDA approval, prepare meals provided for those programs using the nutrient standard menu planning approach, except for children under two years of age. For SFAs providing meals for adults, TDA may request FNS guidance. Supplements continue to be provided based on the appropriate program's meal pattern.

Assisted Nutrient Standard Menu Planning (ANSMP)

Schools on ANSMP must meet the same provisions as the schools on NSMP as well as the following:

Assisted Nutrient Standard Menu Planning (ANSMP): SFAs without the resources to conduct NSMP may use an alternative that uses menu cycles developed by other sources such as TDA, other SFAs, consultants or food service management companies.

Elements of ANSMP: ANSMP establishes menu cycles that have been developed following the requirements for NSMP but that include local food preferences and local foodservice operations. These menu cycles incorporate all nutrition standards including the appropriate nutrient and calorie levels. In addition to the menu cycle, recipes, food product specifications, and preparation techniques shall also be developed and provided by the entity furnishing ANSMP to ensure that the menu items and foods offered conform to the nutrient analysis determinations of the menu cycle.

State agency approval: TDA must approve the initial menu cycle, recipes and other specifications to determine that all required elements for correct nutrient analysis are incorporated. TDA shall also, upon request by the SFA, provide assistance with implementation of the chosen system.

Reassessment: After the initial service of the menu cycle, the nutrient analysis shall be reassessed and appropriate adjustments made.

Final responsibility: Under ANSMP, the SFA retains final responsibility for ensuring that all nutrition standards and the appropriate nutrient and calorie levels are met.

Adjustments to menus: If the analysis shows that the menus planned are not meeting the nutrition standards and the appropriate nutrient and calorie levels, then actions, including technical assistance and training, shall be taken by TDA, SFA or school, as appropriate, to ensure that the lunches offered to children comply with the nutrition standards and the appropriate nutrient and calorie levels.

Other Child Nutrition Programs: Any SFA that operates the SFSP and/or the CACFP may, at its option and TDA approval, prepare meals provided for those programs using the ANSMP approach, except for children under two years of age. For SFAs providing meals for adults, TDA may request FNS guidance. Meal supplements shall continue to be provided based on the appropriate program's meal pattern.

Alternate Menu Planning Approaches

Definition: TDA and SFAs may adopt or develop alternate menu planning approaches that differ from the established menu planning approaches (Traditional Food Based, Enhanced Food Based, NSMP or ANSMP).

Use and approval of major changes or new alternate approaches: Any SFA-developed menu planning approach must have prior TDA review and approval. ATDA-developed menu planning approach does not need FNS approval if: (1) five or more SFAs in the state use it; and (2) TDA maintains ongoing oversight of the operation and evaluation of the approach and makes any needed adjustments to its policies and procedures to ensure the appropriate standards are met. However, TDA must notify FNS in writing when implementing the alternate approach. The alternate menu planning approach must be available in writing for review and monitoring purposes. No formal plan is required; guidance material, a handbook or protocol is sufficient. As appropriate, the material must address how the guidelines are met.

Checklist of Materials Needed for Conducting Nutrient Analysis or Validation of Nutrient Analysis

SFA Name:	Review Week:	
Source Documents	Complete	Additional Data Needed
Planned Menus (for the school week being analyzed)		
• Choices indicated		
• Menu changes or substitutions indicated (dated)		
Production Records (for the school week being analyzed)		
• Site name, meal date and menu type (breakfast or lunch)		
• Forecasted number of meals by age/grade group		
• All planned menu items, including milk types and desserts		
• All condiments used as a compliment to the reimbursable meal (i.e., mustard, salad dressing, margarine, etc.)		
• Brand names and product code numbers of commercially processed foods		
• Serving sizes for each age/grade group of each menu item or food item served, including condiments		
• Number of portions planned for each menu item, by age/grade group		
• Number of portions and serving sizes for adult meals		
• Number of meals served that contain substituted foods in order to accommodate special dietary needs (if applicable)		
Recipes (for any menu item indicated on production records that contain more than one ingredient)		
• Yield (includes serving size and number of servings)		
• List all ingredients; including form, packing medium and fat content		
• Correct measures, weights and/or pack size		
• Include preparation procedures		
Nutritional information for commercially processed food items		
• "Nutrition Facts" label or equivalent information from manufacturer		
Printout of nutrient analysis (if available)		
Indication that re-analysis is warranted	<input type="checkbox"/> Yes <input type="checkbox"/> No	