

Final Rule to Update School Lunches and Breakfasts

Monitoring and Compliance
Implementation Assistance



- This webcast concerns monitoring and compliance issues and offers information on assistance available in implementing the new rules.

Combined SMI and CRE Review

- In the upcoming SY 2012-13, focus will be on certifying that schools are following the new meal patterns & are eligible to receive the additional six cents per lunch.
- Beginning in SY 2013-14, Administrative reviews will include:
 - Nutrient analysis of one week of breakfast and one week of lunch (not combined analysis)
 - Performance Standard 1 and 2 elements
 - Other elements yet to be finalized
- Three year cycle (you will see us more often!)

In this next SY, 2012-13, the State Agency review work will be focused on certifying that schools are following the new meal patterns so that they can receive the additional six cents reimbursement per lunch.

There will be some Additional Administrative Reviews in 2012-13 using current tools, but USDA is providing us with new forms and new questions to begin a three-year review cycle starting in SY2013-14. There will no longer be separate School Meals Initiative portion (SMI) and Coordinated Review Effort (CRE) reviews. Beginning in SY 2013-14, these two reviews will be combined into one Administrative review that will include a nutrient analysis as well as claim procedures review.

The analysis of breakfast meals will be new for most schools, and will begin in SY 2013-14.

Meal Record Reviews

- Documentation will (probably) need to include:
 - Menus for analyzed week and the month
 - Food production records
 - Need to demonstrate compliance to the food subgroups , serving sizes and correct grade groupings
 - Product specifications and nutrient labels
 - Recipes
- Not different than what you currently do! (except we need it for Breakfast also starting SY 2013-14)

Within the monitoring, the Bureau Consultants will need the same types of information we have previously asked for with regard to documentation for the foods used and meals served.

What you need to do before the start of SY 2012-13: be sure that your food production records and menus can adequately document that you are serving the correct portions of vegetable subgroups and other components per day and week.

New food production record templates and menu planning tools are available at our Bureau website to help you document the menu planning you are doing.

Along with new review cycle requirements and nutrient analysis of breakfast, the Final Rule also places more emphasis on compliance with corrective action and consequences if corrective action is not followed.

Ensuring Compliance

- Fiscal action required for unresolved, repeat violations of
 - Vegetable subgroup requirement
 - Milk type requirement
- SAs have discretion to take fiscal action for repeat violations of
 - Food quantity
 - Whole grain requirement
 - Dietary specifications (calories, sodium, saturated fat, trans fat)

•Along with new review cycle requirements and nutrient analysis of breakfast, the Final Rule also places more emphasis on compliance with corrective action and consequences if corrective action is not followed.

•The State Agency will be required to take fiscal action for repeated unresolved violations of the vegetable subgroup and milk type requirements- for example, when the Bureau finds the same violation of offering 2% milk or not including any red/orange vegetables after technical assistance and corrective action have taken place because these are easily identifiable.

•In addition, State Agencies have *discretion* to take fiscal action for repeated violations of the food quantity and whole grain-rich requirements, and for repeated violations of the dietary specifications (calories, saturated fat, sodium and trans fats) because they require specific knowledge or tools from the school food service staff or a careful assessment from a Bureau Consultant.

Six Cent Reimbursement Increase

- Provision of HHFKA
- Lunch requirements effective July 1, 2012
- Funding available only to certified SFAs October 2012
- Breakfast reimbursement has no increase.
- Afterschool snack meal pattern and reimbursement remains the same.

•As you may have heard, there will be a six cent reimbursement rate increase for school food authorities in compliance with the new lunch pattern, as specified in the Healthy, Hunger-Free Kids Act.

•An interim rule was published on April 27, 2012 which addressed the certification process that all State Agencies, will use to determine School Food Authorities' eligibility for the six cents.

•Regardless of whether individual School Food Authorities are interested in becoming certified for the additional reimbursement, all are expected to begin compliance with the new lunch pattern on July 1, 2012.

•This additional funding for School Food Authorities determined to be in compliance with the new meal standards, will be available in October 2012. The additional funding will not be paid until certification documents have been submitted and approved. A separate web cast will cover the certification process in detail.

•We will pay the additional 6-cent reimbursement for lunch *only* to those school food authorities who are eligible and remain eligible to receive it. This first year a sample of schools will be chosen to validate the certification documents submitted. After this year, validation will occur as part of the administrative review.

•There is no reimbursement increase for the School Breakfast Program.

Monitoring

- Rule implementation/reimbursement timeline
 - SY 2012-2013
 - All schools must follow new meal patterns
 - Certification will show eligibility for the six cent reimbursement provision
 - Final year of current 5-year review cycle
 - SY 2013-2014
 - 3-year cycle for administrative reviews begins
 - Applies to lunch and breakfast
 - Weighted nutrient analysis
 - SBP Assessment based on phase-in of new requirements

•Now let's take a minute to recap the timing of implementation of this final rule and how it relates to the timing of the 6 cent reimbursement rate increase and the changes in State oversight of the School Meal Programs. As mentioned previously, the meal patterns are in effect beginning July 1, 2012, and schools are expected to comply with the requirements at that time.

•On April 27, 2012, USDA issued an interim rule on the six cent reimbursement rate increase, which will describe how State Agencies, including the Bureau of Nutrition Programs, are expected to determine which schools are eligible for the additional funding, as well as the administrative review requirements. The additional funding does not go into effect until October 1, 2012.

•SY 2012-13 concludes the final year of the current 5-year review cycle.

•In SY 2013-14, the new three-year review cycle requirement will take effect. State agencies will monitor compliance with the lunch and breakfast meal patterns and dietary specifications, including a weighted nutrient analysis for menus *as offered*. Schools will not be required to conduct nutrient analyses, but if they are already doing so, may submit it as part of the certification process. This will be explained in more detail in the certification presentation.

•Schools that do not certify compliance with the meal patterns in 2012-13 will be the first chosen for review in the new 3-year cycle.

•More frequent monitoring provides additional opportunities to provide technical assistance and guidance to the school food service staff. Five years is seen as a long time between reviews and change-overs in staff have resulted in some unfortunate misunderstandings.

•Also note that the assessment for breakfast, until all requirements are fully phased in, will be based on

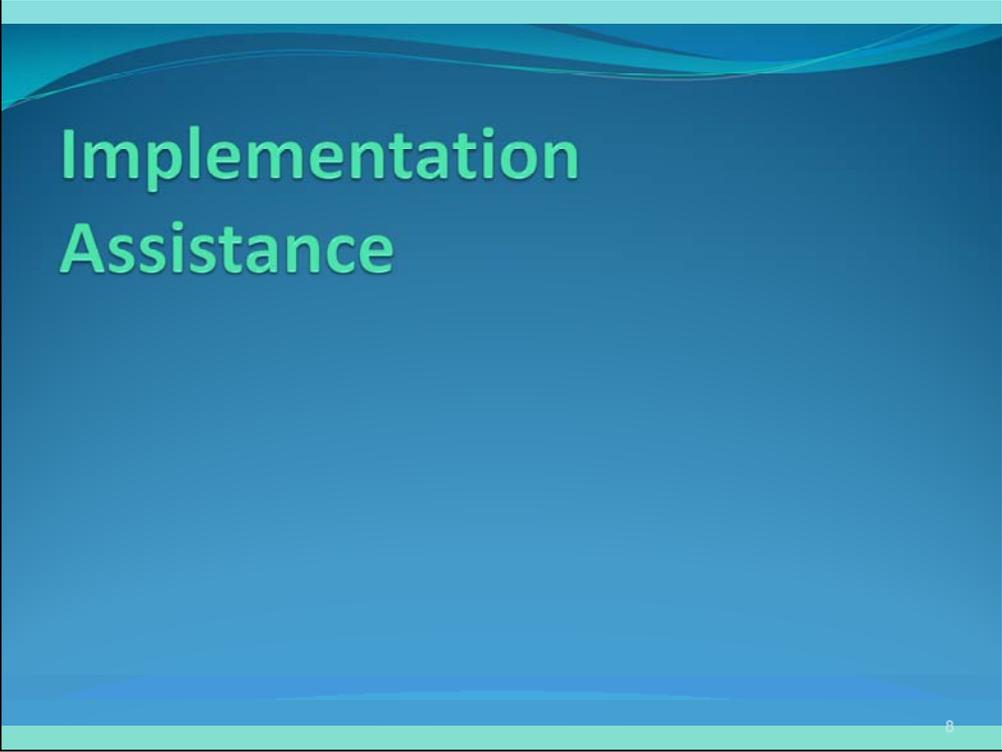
Concurrent (same time) Adoption of Meal Requirements

- Some of new school meal requirements being phased in over several years
 - Designed to reduce operator burden
- Some SFAs may prefer to adopt changes to NSLP and SBP at the same time
 - SFAs must seek permission of States to implement new standards earlier than required (see implementation chart)

•Finally, a word on the concurrent adoption of breakfast and lunch meal requirements. Concurrent means at the same time.

•Some of the new school meal requirements are being phased in over several years, which is designed to reduce the burden on food service staff. Most of the breakfast changes are not required until 2013-14.

•However, some School Food Authorities may prefer to adopt changes to breakfast and lunch concurrently. In this case, School Food Authorities must seek permission from the Bureau of Nutrition Programs to implement new standards earlier than required, to ensure that the nutritional integrity of the meal is not compromised. If a school wants to implement the new breakfast meal patterns, they must do it completely and correctly.



Implementation Assistance

- USDA is committed to helping State and local operators implement these changes. As new information and resources are finalized, they will be posted to FNS websites, which are listed on the last slide. Additionally, State Agency-Regional Office telephone briefings and conferences will be planned and held, and information relayed on to local School Food Authorities.

Assistance from USDA

- Updates to Food Buying Guide
- Working with NFSMI to offer training
- Updating menu planning resources and issuing guidance and technical assistance
 - Child Nutrition Database
 - CN Labeling Program updates re: whole grains
- Offering support through Team Nutrition
- Additional funding for State Agencies

•One of the ways USDA is working to facilitate this transition is to update the Food Buying Guide and other necessary resources. The first piece they distributed was the new Grain/Bread Chart. The grain/bread component presentation includes more information on that resource.

•USDA is also collaborating with the National Food Service Management Institute and the National Agricultural Library to develop training opportunities.

• In addition, USDA is updating the Child Nutrition Database that is used for the menu analysis. They will also re-evaluate the nutrient analysis software systems available from industry to assist State agencies with monitoring calories, saturated fat, and sodium in the meals offered to students in grades K through 12 during the administrative review.

•A very helpful piece is that the Child Nutrition Labeling process (called CN labels) is also being updated to report vegetable subgroups and whole grain-rich contributions to the grains component, as well as to provide standardized crediting claims.

•Finally, USDA is offering additional support through Team Nutrition and our Regional Offices. Iowa's Team Nutrition Consultants are interested in assisting schools to apply for the HealthierUS School Challenge, which closely mirrors the new meal pattern. That would be a great way to get some assistance with making meal pattern changes and helping ensure that other areas of the school environment meet some higher standards for nutrition education and physical activity. For more information, contact Patti Delger at 515-281-5356.

•The Final Rule also offers additional funding for State Agencies to implement and work with local School Food Authorities.

USDA's Next Steps

- Continue revising technical assistance materials
- Watch the USDA website for “Question and Answer” documents and other memos. Go to <http://www.fns.usda.gov/cnd/Governance/Legislation/nutritionstandards.htm>

•To help with implementation of the new requirements, USDA is revising and developing technical assistance materials, training, and other resources.

•USDA continues to update a Questions and Answers document posted on the Nutrition Standards for School Meals website. Each time it is updated, new questions and other new information is printed in italics so it is easy to identify what is new.

Iowa DOE Next Steps

- Information on the meal patterns and certification for the six cents reimbursement will be included in summer training
- Webinar on certification late summer 2012
- Additional regional meetings are planned
- Watch the Bureau web page School Nutrition Standards 2012 for more information Go to:
http://educateiowa.gov/index.php?option=com_content&view=article&id=2595&Itemid=4678

•We at the Iowa Dept. of Education will continue to update you on new information from USDA as we receive it. Information on the meal patterns and certification will be included in any summer training as appropriate.

•We are planning a webinar on the certification process late summer 2012 that will be recorded and posted on our web site.

•Additional regional meetings are planned to answer questions and provide technical assistance both in fall of 2012 and probably also in 2013 as schools prepare to implement breakfast changes.

•We are trying to make the School Nutrition Standards 2012 your “go to” location for more information about the new meal patterns.

Useful Websites

- Nutrition Standards for School Meals FNS site:
<http://www.fns.usda.gov/cnd/Governance/legislation/nutritionstandards.htm>
- School Nutrition Standards 2012- Iowa Dept. of Education
http://educateiowa.gov/index.php?option=com_content&view=article&id=2595&Itemid=4678
- Choose My Plate: <http://www.choosemyplate.gov/>
- Healthy Meals Resource site:
http://healthymeals.nal.usda.gov/nal_display/index.php?info_center=14&tax_level=1
- Let's Move school page: <http://www.letsmove.gov/healthy-schools>
- The Healthy, Hunger-Free Kids Act site:
http://www.fns.usda.gov/cnd/Governance/Legislation/CNR_resources.htm

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This slide includes some useful websites. These links are also on the Iowa Dept. of Education School Nutrition Standards 2012 web page.

Nutrition Standards for School Meals FNS site: (USDA website on the new meal patterns)
<http://www.fns.usda.gov/cnd/Governance/legislation/nutritionstandards.htm>

Our Bureau:
http://educateiowa.gov/index.php?option=com_content&view=article&id=1235&Itemid=391

Choose My Plate: (these food groups match new meal patterns)
<http://www.choosemyplate.gov/>

Healthy Meals Resource site: (Team Nutrition)
http://healthymeals.nal.usda.gov/nal_display/index.php?info_center=14&tax_level=1

Let's Move school page:
<http://www.letsmove.gov/healthy-schools>

The Healthy, Hunger-Free Kids Act site:
http://www.fns.usda.gov/cnd/Governance/Legislation/CNR_resources.htm

Interested in More Information?

- Check out all of the webcasts at the Bureau website
- Keep a careful watch on your e-mail for updates
- Continually check the Bureau website for new information
- Regional Workshops are in the planning stages for Fall 2012
- Annual SNAI Conference in June 2012 at Dubuque
- Summer Short Courses in June and July 2012 at Ames
- Contact your consultant

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You may have already heard or participated in learning some of the updates in various ways—webinars, webcasts, SNAI district workshops, e-mail messages, spring regional workshops—keep all of those in mind, as new and additional information becomes available.

Contact your consultant for further information on training opportunities.

Moving Forward Together!

Be assured that we are all taking one step at a time. Please email or call your local Consultant if you need assistance. We want to see you succeed!

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Call our Bureau at 515-281-5356. Ask Janelle Loney, Bureau Secretary to direct you to the area Consultant who will work with your school.

Our Bureau website:

http://educateiowa.gov/index.php?option=com_content&view=article&id=1235&Itemid=391

Bureau Office: 515-281-5356.