Date of Interview: July 27, 1999

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

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

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

BACKGROUND QUESTIONS

1. How many SFAs are there in your state?
There are 180 SFAs.

2. How do you define an SFA? Is it a school district or something else?
SFAs are defined based on the school district. This is a federally based definition. The number 180 includes public schools only. There are also approximately 40 private and state institutions, including five RCCIs.

3. When did your state begin SMI reviews?
4. Why did you start then as opposed to earlier or later?

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

5. How many SMI reviews were completed in


6. How do you define a completed review?

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

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


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

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

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

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

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

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

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

12. Do your reviewers have access to the Internet?

Yes, the same as e-mail access.

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

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

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

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

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

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

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

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

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

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

Yes.

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

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

At the district level, directors have master’s degrees and training to know what best practices are. However, they cannot be in the schools every day. Therefore, schools do not always follow best
practices. At the school level, a cook may put in 1.5 pounds of butter when the recipe calls for a pound, because the kids will like the food better. Currently, the state has a policy of “training the trainer,” but this does not always ensure that everyone gets the best training.

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

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

**PROCESS IN THE STATE**

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

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

2. With what organization is this person employed?

Georgia Department of Education.

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

Information is collected in hard-copy format. The state is required to keep the information for three years plus the current year. The secretaries input the information into NutriKids. The more menu choices the kids have, the more work there is for staff. This is a disincentive for providing more choices. (The staff looked at the folder of information on one school’s meals for a week, and there were hundreds of labels and recipes that had to be input for one week’s worth of meals.) Even though NutriKids has a database that they can use so
that they do not have to enter raw nutrient data on everything, a lot
of recipes and foods are not there. Even some foods from the USDA
commodities program aren’t programmed into the system’s nutri-
tional database.

4. Who performs the nutrient analysis of this information?
Consultants do the analyses and secretaries enter the data.

5. Are there any steps between the initial collection of information
and the nutrient analysis? If so, what are they and who performs
them?
The information is collected on-site. Some information can be sent
ahead of time. This depends on the school district. Very few districts
(about five) use NuMenus. Therefore, the state has to do most of the
nutrient analyses.

6. Is the nutrient analysis ever revised after it is initially performed?
If so, when and by whom? Where is the revision information
recorded?
A corrective action plan is formulated, and the SFA changes its
menus accordingly. A reanalysis is then done based on those
changes. If the SFA uses a food-based system, the state consultants
redo the analysis. If the SFA uses a nutrient-based system, it does the
reanalysis itself. This is an ongoing process. SFAs have to show that
they are “moving toward” good nutrient content. The new analysis is
not part of the initial review. Once the SFA has been given a correc-
tive action, it moves to the next phase.

7. How often are nutrient analyses usually revised?
About 50 percent require reanalysis and another site visit. The con-
sultants need to do another site visit to make sure that the school is
doing what it says it is doing. This is basically technical assistance.

8. Are data elements ever added or deleted from the information
during this process?
No.

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

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

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

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

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

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

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

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

It is kept on hard copy at the state office.

14. Does the state do an independent nutrient analysis for SMI reviews, or does the state review existing analyses, or both? In which cases does the state do independent reviews? In which
In terms of transferring data from Nutrikids, data can be saved to a data file and sent to the FNS. There may be some validity to having a state-level database in the future, but such a database does not currently exist and funds are not available to commit to this.

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

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

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

It depends on what data elements the FNS is asking for. Additional information may have to be collected. Comparisons that are done without background information on what is really happening in the schools are not accurate, and this needs to be taken into account.
18. Which of the required data elements are currently missing from the software package you are using for your nutrient analyses?

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

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

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

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

See notes with data elements.

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

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

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

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

23. Can you think of any alternatives for any of the processes we have discussed so far?
One alternative is to not do the SMI review at all because it is meaningless. The FNS should put its money into food service management training, which would help improve school nutrition more than collecting this type of data.

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

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

DATA ELEMENTS

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