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BACKGROUND QUESTIONS

1.  How many SFAs are there in your state?

   There are 506 SFAs; 32 are RCCIs.

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

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

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

5. How many SMI reviews were completed in

6. How do you define a completed review?
A review is considered complete when all the steps in the process are finished. The steps are as follows:

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

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

8. Do you think your state will need to make any changes in the future to process or staffing in order to complete the SMI reviews in five years?
No. Currently there are four reviewers at the state level, and the department contracts with four registered dietitians. Reviews are done on a one-on-one basis, where each reviewer works exclusively with one registered dietitian.

9. Are SMI reviews done in conjunction with CRE reviews?
Yes, they are done in conjunction with CRE reviews.

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

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

12. Do your reviewers have access to the Internet?
Yes. All consultants have Internet access.

13. Is there any other software (e.g., MS Excel) that reviewers use for completing reviews? If so, what? Is the same software used at the state level and at the SFA level?
All contractors have Nutrikids. The contractors and consultants do not use any other software for the SMI reviews. An Access database with the nutrient analysis information is maintained by Connie Stefkovich.

14. How many people are involved in doing SMI reviews and analysis?
There are four consultants and four contractors working on the reviews, in addition to an overall administrator (nine people total).

15. Where are they located? For whom do they work?
Three of the reviewers and the administrator are located at the state office and one is in North Platte. The contractors are spread throughout the state.

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

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

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

Yes.

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

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

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

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

**PROCESS IN THE STATE**

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

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

2. With what organization is this person employed?

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

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

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

4. Who performs the nutrient analysis of this information?

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

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

The contractor may call the SFA with any questions regarding the information necessary to complete the analysis. For example, the contractor may need to go back to the SFA to get nutrient informa-
tion on a product. In some cases, usually at the beginning of the school year when there is no lead time for the review, the consultant may interview the manager first and then have her send the information for the nutrient analysis. This may also happen with RCCIs or in an SFA with a new food service manager, whom the consultant has to advise what to do.

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

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

7. How often are nutrient analyses usually revised?

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

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

No.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The state will add them to the database.

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

See comments with data elements.

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

It should not be a problem to send information electronically to the FNS as long as it is willing to accept whatever format the data are in. The state staff do not want to have to worry about formatting the data in a specific way. They are mandated by an internal mandate from the database administrator at the Nebraska Department of Education to keep the data in an Access database. All databases must be the same so that they can be merged if necessary.
22. How often do you think the states should have to report this information to the FNS? The FNS is required to prepare an annual strategic plan. Therefore, it is leaning toward annual collection of this information. Would this cause problems for your state?

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

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

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

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

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

There are rumors going around that the USDA plans to tie reimbursement for lunches to meeting the nutrient standards in the future. The staff wanted to know if that was why it wants this information. If that happens, poor kids in Nebraska will suffer
because the schools will stop participating in the lunch program. They will still serve lunches, but they will no longer have free lunches available, and they will serve whatever they want. This would do more harm than good. There is still a lot of local control in Nebraska. Often, the school food manager cannot serve what he thinks the kids should have because the superintendent tells him what to serve.

**DATA ELEMENTS**

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

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

As for the standards themselves, Nebraska personnel felt that it would be a waste of their time to list these for each analysis. If they give the FNS the type of meal plan used and the age and grade range, then the FNS will automatically have the standards—because the
standards were developed by the USDA in the first place. If absolutely necessary, they would willing to list the standards for the various meal plans used in the state once at the beginning of the report, but any more than that would create an unnecessary burden. Also, they wanted to know why the FNS doesn’t seem interested in the standards for cholesterol, sodium, or fiber that the state has developed because those are the only types of standards that were not mandated by the USDA.

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