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BACKGROUND QUESTIONS

1. How many SFAs are there in your state?

There are about 1,275 SFAs, but the number is growing.

2. How do you define an SFA? Is it a school district or something else?
SFAs can be school districts, charter schools, private schools, RCCIs, county jails, group homes, yeshivas, etc. Based on a guidance memo from the USDA, the state is allowed to be more flexible with RCCIs on SMI reviews.

3. When did your state begin SMI reviews?


4. Why did you begin then as opposed to earlier or later?

New York did some pilot testing in 1997–1998 but was not really ready to start the SMI until 1998–1999.

5. How many SMI reviews were completed in

- 1996–1997? 3 reviews (this was pilot testing only).
- 1998–1999? 90 reviews (there may be as many as 20 more that have not been logged in yet).

6. How do you define a completed review?

A review is complete when the analysis is finished, a correction plan is offered, and the review is filed at the state.

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?

The state took on some summer feeding staff when the SMI began. The program is short-staffed—there are still six vacant positions, although these people will do more than just SMIs.

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

It depends on the person doing the review, but usually they are done in conjunction with each other. However, they can’t both be done on the same day.

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 state didn't add any staff. The task force that piloted the SMI worked out its own protocols. Staff are still at the “bottom of the learning curve” with training. They did have training for everyone on Nutrikids. The state also did a lot of training for the schools on NSMP. (Thirty-five percent of the SFAs in New York are on NSMP.) The analyses generally use weighted averages, although New York has a waiver to do unweighted analysis.

11. Do your reviewers have access to e-mail?
Yes. However, they only have access while in the office, not in the field.

12. Do your reviewers have access to the Internet?
Yes. This is 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?
Everyone has Nutrikids, but they really need software that they can use statewide in a networked manner. This is not possible with current versions of Nutrikids. The department is also going to an Oracle system, but this system will not include nutrient analysis information.

14. How many people are involved in doing SMI reviews and analysis?
There are 15 people doing reviews, and two people overseeing the process.

15. Where are they located? For whom do they work?
Three are in the Syracuse office, three are in the Buffalo office, and the rest are in the state office in Albany.

16. What are each of their roles in the SMI reviews?
The 15 reviewers all do site visits and nutrient analysis. The two people overseeing the process review the analyses before correction plans go to the schools.

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?

Not really. The SFAs are offering good food, but the kids are not eating it. A lot of it goes in the trash. The nutrient analysis does not reflect reality. There is diversity in record keeping and collection. Also, the SMI doesn’t account for food served à la carte.

Schools have been serving more salad bars and more pasta bars and less fattening foods. This is a result of training, not the SMI. You would probably get better results with more training. The time and money spent on the SMI could be better spent. As far as data go, “garbage in equals garbage out.” There are lots of advocates in the schools for good nutrition, especially among the parents.

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

The state would be concerned about sending the information directly from the reviewers. The state is not sure that is necessary. The CRE is a composite; information on how each school is doing is not sent to the USDA. The FNS should only be getting aggregate data. The school-level data are not representative of how the school actually did. It would be a waste of time to give the FNS all the data. Looking at all the reviews together would be comparing apples to oranges.

PROCESS IN THE STATE

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

The individual reviewers collect the information, but each one does it differently.

2. With what organization is this person employed?

They all work for the New York State 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?

Everything is on hard copy. Even schools on the NSMP print out the analyses for the state staff.

4. Who performs the nutrient analysis of this information?

The reviewers perform the nutrient analysis unless the school is on the NSMP. Then the SFA is responsible for the analysis.

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

During the site visit, the reviewer observes the operation and does data collection. There may be some back-and-forth with the school if information is missing. Reviewers have contact with the schools for a couple months before the actual site visit so that they can educate the food service people ahead of time about what is expected. They run workshops that food service people from all SFAs are supposed to attend before the SMI review.

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

Yes. Schools on NSMP usually reanalyze their data based on their correction plan. It is good public relations for the district to show how they are improving the meals the kids are eating. So far, the analyses the state reviewers perform have not been reanalyzed.

7. How often are nutrient analyses usually revised?

Only a couple analyses have been redone and sent in to the state so far. Some others may have been redone but not yet sent in.

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?
The state hopes to aggregate the information in the future but has not completed its ACCESS database yet.

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

The state office and the regional offices keep copies of review information. The backup information is kept in the regional office from which the review is performed.

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

The correction letter goes to the state supervisors first for technical review and to keep the letters consistent. After the letter is approved, the analysis is sent to the state to be logged in. The SMI reviews are cross-checked with the CRE’s to make sure that both have been done in each cycle.

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?

Some of the letters are sent by e-mail, some by fax. The analysis is sent on hard copy.

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.

The analyses are kept on hard copy, and the summary is kept in electronic format.

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.)

For schools on the NSMP, the state staff reviews the analysis but does not redo it. For schools on food-based meal plans, the state staff perform the analysis.
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 information should come from the state. That way, the state has internal control. The reviewers and the reviewees would be more comfortable if the information went through the state first.

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 FNS should standardize what it wants. Then it would receive the same kind of analysis from all those reporting—states, reviewers, and SFAs. New York will arrange to do whatever is mandated.

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?

New York would have to compile the information from 15 different computers plus the schools on the NSMP before sending it to the FNS. Either the data should all come through the state or the state should not be responsible for schools on the NSMP.

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 Nutrikids. 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 would want a computer program from the FNS for doing the reports.

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 is no problem to report to the FNS electronically if the state is provided with a protocol for the required data elements. Otherwise, the information can be sent directly from the new database, but that is not complete yet. The staff members are not sure that data collection is worth doing—SMI data are iffy at best.

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 is fine. Reviews for a given school year are usually finished by November or December.

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

It is not clear what the FNS is looking for here. However, the state believes that training, rather than nutrient analysis, is the place to start. State staff should first teach the food service people what they need to do to get the correct nutrients in the meal. Once they can do that, then the meal can be analyzed to see if it meets the standards.

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?

Sixty-seven percent of the 1.6 million kids who eat lunch in New York State schools each day are on free or reduced-price meals. Probably a vitamin pill would be better than doing the SMI as far as getting the kids their nutrients. Healthier meals could be promoted in a less cumbersome way. With the SMI, too much state money is going into entry of artificial data. It is very time consuming and stressful and not “the biggest bang for the buck.” New York spends $600 million for reimbursement and the budget for the agency is only $5 million. The FNS could get the information it wants with an added question or two on the CRE. There is a sense in New York (and probably in
other states as well) that the SMI is going to go away because there are better ways to do it. Nutritional integrity of the meals is important, but the SMI sends too many mixed messages. Instead of a full SMI, staff could spot-check using statistical sampling. Encouraging low-fat milk would definitely help.

Some analyses will have missing vendor information. However, staff then must convince the school that it needs a new vendor. It is important to have nutritional and fiscal integrity in the program.

**DATA ELEMENTS**

If the state is responsible for overseeing the child nutrition programs, why should the FNS want the SFA-level data? There is no reason to give a name and address for a contact person or the person doing the review. The FNS should not be contacting them. Questions should go through the state director. Right now the state does not collect the number of schools in the SFA as part of the SMI. The average daily number of lunches served should correspond to the question on the CRE, which asks for lunches in the SFA in a month. It seems unnecessary to give the FNS the standards since they come from the FNS in the first place.