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Name: John Perkins
Agency: Texas Education Agency, Child Nutrition Programs
Title: Director

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Agency: Texas Education Agency, Child Nutrition Programs
Title: Program Director for Compliance and Monitoring

BACKGROUND QUESTIONS
1. How many SFAs are there in your state?

There are about 1,100 SFAs, but that number will be closer to 1,200 when charter schools are added.

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

SFAs are either school districts or charter schools. The Texas Education Agency (TEA) is responsible only for public schools. The Department of Health Services is responsible for administering private schools, RCCIs, jails, etc.

3. When did your state begin SMI reviews?


4. Why did you start then as opposed to earlier or later?
The TEA provided Nutrikids to all Educational Service Centers (ESCs) before the SMI started, therefore, many of them were already doing nutrient analyses prior to the official start of the SMI. In 1997–1998, SMI reviews were placed on the same cycle as the state CREs.

5. How many SMI reviews were completed in

6. How do you define a completed review?

The state agency does not get the information on completed reviews. The definition of a completed review will depend on the ESC doing the review.

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 ESCs will be adding additional staff to handle the SMI. About ten people in ten different regions were hired for the SMI. How many people work on the SMI depends on the size of the region. Two people will do it in larger regions and only one in smaller regions. The state does not dictate how many they have.

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

The SMI reviews are done in the same school year as the CRE, but not at the same time. The CRE is done from the state office in Austin, and the SMI is done by the ESC. The state office gives the ESC the list of SFAs that are getting a CRE that year. Texas has decided that the SMI is not to be considered official compliance monitoring, because it doesn’t want the SFAs to fear it and consider it too much of a burden.

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

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

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?

The state provided NutriKids to all ESCs. However, because the ESCs are semi-independent entities, created by the legislature to provide assistance, they may all have different computer programs in addition to NutriKids.

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

There are about 25 people working on the SMI. However, it is difficult to give an exact number because the state agency does not mandate what the ESCs do. There is at least one person in each ESC working on the SMI, and some of the ESCs with bigger SFA loads have more than one person. Some ESCs contract out some parts of the SMI reviews.

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

They are located in the regional ESCs. Most of the people work for the ESCs, which are funded by the TEA. However, some ESCs contract out parts of the SMI or use nutrition students at nearby colleges. It depends entirely on the ESC.

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

Each person’s role in the SMI completely depends on the ESC.

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

Yes, but the state agency personnel get the nutrient analysis only if they ask for it. It is not usually sent to the state.
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. The cost/benefit analysis of the SMI is not justified by the results of the program. Serving the required healthy meals and providing the nutritional background for the SMI reviews require expertise that many schools don’t have. In Texas, 84 percent of schools are still on food-based meal plans, and the main reason for this is the nutrient analysis. Schools don’t have the time or the expertise to complete these analyses. Seventy-five out of the 178 SFAs on NuMenus have contracts with food service management companies. The nutrient analysis requirement deters schools from trying innovative menus.

Also, doing these analyses is not an exact science. There are too many points along the way where the reviewer has to make a decision about what to enter. A set of practice-based menus would make more sense. The fat levels and calorie levels are the biggest problems. However, there are ways to get these levels down without the SMI. Within five years, 90 percent of meals in 90 percent of districts will probably comply with all nutrient requirements. However, 5 percent of districts will never make it.

Oklahoma did an experiment in which 12 people on 12 computers were given the same menus, recipes, and labels told to do nutrient analyses. They came up with 12 different analyses. This indicates a problem with the way analyses are done.

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

Yes. The reviewers and SMI information are located in 20 regional areas around the state. The data are not consolidated, and each ESC does the reviews differently. Texas does about 250 CREs per year, so the ESCs should be doing about the same number of SMI reviews. This is a huge amount of data to be sending to the FNS.

**PROCESS IN THE STATE**

1. Who collects the raw information for nutrient analyses on food offered in any given SFA?
It depends on the ESC, but the SFA has to provide the data to ESC staff or to a contract person.

2. With what organization is this person employed?

It depends on the ESC—either the school district, the ESC, or a contractor.

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 on hard copy.

4. Who performs the nutrient analysis of this information?

It depends on the ESC, but either the ESC staff or a contractor.

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

It depends on the ESC, but, if additional information is needed to complete the analysis, the ESC or contractor will contact the SFA.

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

It could be changed if a reviewer finds that actual information during the site visit is different from what was sent to the ESC.

7. How often are nutrient analyses usually revised?

They are revised as needed.

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

No. Clarification of the information may be obtained by the reviewer if there are questions, but items are not added or deleted.

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 information may be aggregated at a regional level by the ESC, but it is not aggregated at a state level. There are currently no plans to aggregate the data in any systematic way. The state does not really know what type of aggregation the ESCs are doing.

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

The information should be kept on file by the district, including a copy of the analysis and the improvement plan. The ESC also keeps a copy.

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

A recap that includes general information is sent to the state annually, but the individual nutrient analyses are never sent to the state. If the state got that information, it would feel obligated to do something with it, and it currently does not have the personnel for this. There would have to be some sort of mandate to force the ESCs to send the data to the state. Currently, the TEA only gets data required by state or federal law.

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?

The recap is sent on hard copy. No other data on SMI reviews are sent to the state.

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.

Information that is sent to the state goes to the state nutritionist (Nancy Cise, 512-973-9760).

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.)
It depends on the ESC, but ESCs will usually review analyses for SFAs that use NuMenus and perform analyses for SFAs that are on food-based systems.

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 nutrient analysis should not be sent to the FNS. However, if doing so is mandated, then the state would have to coordinate the process, and it would be a huge effort. There is no way to say right now what would come from each ESC. The data will not be consistent, because they will come from different entities using different software. Also, data can be manipulated to say what you want them to say.

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

The analysis data would have to be coordinated through the state agency.

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 nutrient analysis should not go directly to the USDA. The state would have to coordinate any data transfer. Since the state agency is ultimately responsible for what is sent to the FNS, it would want to review the analyses first.

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 TEA would have to meet with the computer people and figure out a way to do that. It would be a huge effort. Texas has a system for submitting reimbursable claims in electronic format, so it might be possible to piggyback on that system.

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 FNS electronically? Will this create any problems for your state?

It will create problems because no system is currently in place to send the data to the state agency in the first place. Also, the amount of data that will come from Texas alone is huge. The FNS does not have the resources to deal with the amount of data it is asking for.

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?

Texas will do whatever is legislated but would need enough time to pull everything together. The data should be sent no more often than annually.

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

No.

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 SMI is a waste of valuable time and money. School meals can be brought into compliance with the guidelines without doing nutrient analyses. Having to report the results of the SMI moves into a compliance monitoring area that goes beyond the legislative and regulatory intent.
The SMI has a large impact on the schools, particularly the small ones. (In Texas, 50 percent of the students are in only 46 SFAs; the other 50 percent are spread over more than 1,000 SFAs.) The small SFAs feel that the SMI is “beyond them”—that they don’t have the education and expertise to complete it. This makes their personnel feel dumb or inferior. They need formal training rather than the SMI to help them understand purchasing, etc. Also, the information is unreliable. There is some question as to why we would do this kind of review on the meals served to healthy kids when hospitals don’t do it for sick kids.

Parents and children understand the food pyramid and want to work with that. They do not understand the nutrient guidelines, mostly because they are very hard to visualize. In addition, the nutrient analysis does not ensure that the kids are eating the foods that are being analyzed. Schools are taking the foods that kids like and making them à la carte, so that they are not included in the analysis. This polarizes the kids, because kids who get the free and reduced-price lunch are in the hot lunch line and the kids with lunch money are in the à la carte line. Also, outside agencies come in and set up food service à la carte in many schools. The nutrient analysis is a distorted view of what kids are eating. The SMI actually has had a negative effect on the food service people and on kids’ eating habits.

The strong Hispanic influence in Texas makes it hard to feed kids the foods they like. Most menu cycles do not have enough meals that these kids will eat. Also, there are a lot of kids who live in rural areas and go home to work on the farm. They need more calories than the average child, but this counts against the school in the nutrient analysis. Schools can be taught to serve healthy meals. If the state agency has a good relationship with the schools, they will comply. If the FNS went with the food pyramid instead of nutrient analysis, then everyone would understand. Also, this would be positive for the schools because it would show that the USDA was listening to them.

Finally, schools are putting more money into file cabinets than food with the SMI. This seems to go against the paperwork reduction act.
DATA ELEMENTS

The state staff personnel are not sure how valid this data collection tool will be. The FNS will be collecting huge amounts of data for questions that someone may or may not ask. Collecting information just for the sake of having it is not worth the trouble. Also, this implies a universal process for collecting data, and that is impossible. Right now, staff are doing more data collection than training. In addition, releasing data on a specific school that was doing badly could create a public relations problem. It would also be a meaningless effort, since they cannot close down a kitchen if it does not meet the standards. The TEA is violently against coming up with a national average on the nutrient standards. It feels that the SMI puts an unreasonable burden on states, and now the FNS is trying to justify it.

As for the data elements, the TEA cannot really give a date the analysis was closed. It does not have standards for cholesterol, sodium, and fiber, so reporting them would be meaningless. It does not plan to develop standards for these items. The first review will be used as a baseline for future comparisons.

PROCESS IN TEXAS, REGION XIII, ESC

Contacts:

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Process Questions

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

The ESC staff collects the information. It is either sent by the school district before the site visit or collected at the visit.

2. With what organization is this person employed?
They work for the ESC.

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 on hard copy. Rural schools could not possibly do it any other way.

4. Who performs the nutrient analysis of this information?

The ESC staff.

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 standard policy is first to send a letter to the SFA saying that the SMI will happen soon and telling it what information will be required, then to send a second letter giving the dates for the review week and the date for the site visit. Schools usually comply, so no further action is taken before the analysis is performed.

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 there are problems, staff will look for the glitch. Last year (1998–1999) was the first year for doing the SMI, so all the materials are drafts. Sometimes things are not up to par—the information may not be accurate or the school may send in a different recipe from what it used. In these cases, the ESC will revise the analysis.

7. How often are nutrient analyses usually revised?

Almost all the analyses were revised last year. Sometimes revision is done on site. Time permitting, staff will go back to see if the school has improved. The analysis is really a living document. Most districts are not where they need to be and aren’t using standardized preparation and production, even when their food service directors think that recipes are being followed. They must get their staff to understand that they need to follow recipes. This is a problem across the board with all sizes of SFAs.
8. Are data elements ever added or deleted from the information during this process?

No. Clarification of the information may be obtained by the reviewer if there are questions, but items are not added or deleted.

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 information has not been aggregated so far. The ESC does not have enough staff to do it. They would like to, but they don’t have the secretarial help. They do not want to contract out any of the work, because they would lose control. The ESCs can’t make things happen in the schools, though. They are supposed to give strictly technical assistance.

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

The records are kept at the SFA and at the ESC. In a small district, ESC staff will work with someone in administration other than the food service director. They might talk to the superintendent. All superintendents receive a letter from the ESC about the SMI. This establishes a sense of importance about what they are doing. Some superintendents are interested in such things as grams of fat. Some don’t care unless there is money involved.

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

The information is not sent to the state.

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?

Not applicable.

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 at the SFA in hard copy and at the ESC on hard copy and electronically.
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.)

This ESC has 16 SFAs on NuMenus—most of them with management companies. It has more management companies than other regions. ESC staff redo all nutrient analyses for SFAs on NuMenus. The ESC also has 43 food-based SFAs, and ESC staff have to do analyses on those. It also does a precompliance CRE visit, which is separate from the SMI, for all SFAs before the TEA goes in—so there is plenty of work.

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?

It would be fine to send it from the ESCs, because they are the ones who are familiar with it.

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 exactly what the FNS wanted. However, every analysis will be different. This is really comparing apples to oranges. The staff have a real concern about the value of this exercise. Some ESCs don’t redo analyses for SFAs using NuMenus—this makes comparison even more problematic.

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?

This would be putting money into the end of a process that should be put into the beginning. There is no infrastructure for doing the SMI,
and it is too early to aggregate the data. School food staff do not have
the education and training necessary to complete the SMI. In
addition, because school administrations do not recognize nutrition
as part of the educational system, they don’t want to have to teach
children and parents about nutrition.

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 ESCs would need a program designed to tie everything together
and give a summary.

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?

If the ESCs are given a program to use, it will be no problem—for
what the data are worth.

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 OK.

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

No. If these data are collected, ESC staff would like to see compar-
sions by state with national norms. Calcium is a big problem in their
area. If the data were released to the public, they don’t see any pub-
lic relations problem. They have to be more concerned with the kids than the image of the school district.

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?

If SFAs aren’t making the grade, then things need to change and a good shakeup is necessary. However, the SMI may not be the right way to do it. It is important to make sure that this reporting exercise will not be a waste of time. Right now, the SFAs are overwhelmed by paperwork. In addition, some food service people just don’t understand what they need to do. They need grassroots training on using the food-buying guide and creating standardized menus. The ESCs have tried to create standardized menus, but it didn’t work. For instance, a highly educated food service director in a rural area didn’t want to use them because she wanted to serve her own food.

Also, the fact that healthy food is served doesn’t mean that the kids are eating it. A lot of it ends up in the trash, and this is not taken into account with the SMI. There is a big difference between what is being served and what is being consumed. To effect change, the SFAs would need a mandated nutrition program for prekindergarten and up.

**Data Elements**

The list seems pretty comprehensive, but the staff in all 20 ESCs in Texas would need training on how to collect the correct information for the FNS. The food service people would need to know exactly how to input each item. To be able to interpret the reports, the FNS would need to have background information on what menus and recipes, etc., went into the analysis. Such training would make the data somewhat valid, but they would still be open for interpretation.