United States Department of Agriculture

Food and Nutrition Service

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SUBJECT: Child Nutrition Reauthorization 2010: Revised Questions and Answers Related to the 6 Cents Certification Tool

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

Attached are Revised Questions and Answers related to the Food and Nutrition Service prototype 6 Cents Certification Tool. Please note that the only revision made to the Q&As is in question 14. We have received several questions about this Q&A and have added information to make a more complete answer.

Under section 201 of the Healthy, Hunger-Free Kids Act of 2010, an additional reimbursement of 6 cents per lunch is available for school food authorities certified to be in compliance with the new school meal patterns. The 6 cents certification tool will be used to certify school food authorities to receive the 6 cents performance-based reimbursement. The attached Questions and Answers reflect questions we have received and provide additional information on using the tool.

School food authorities should contact their State agencies for additional information. State agencies may direct any questions concerning this guidance to the appropriate Food and Nutrition Service Regional Office.

Original Signed

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Director
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Attachment

The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

Certification Tool

Menu Worksheet

Q1. How does the Menu Worksheet portion of the 6 cents certification tool assess compliance with the meal pattern?
SFAs enter all reimbursable meals offered on the menu they are submitting for certification. The Menu Worksheet portion of the tool assess whether all required components are offered in the required amounts.

The Menu Worksheet is not weighted. Certification is based on offered menus, actual selection by children is not considered. SFAs are to report the offerings of fruits and vegetables on the menu in the full amount the child is able to select, not what the child typically selects in order to meet offer versus serve requirements. For example if there are three ½ cup servings of different fruit available for selection and the child is instructed to choose 2, the amount of fruit entered into the Menu Worksheet would be 1 cup.

The 6 cents certification tool does not assess compliance on a per-serving line basis. Separate from the certification tool, SFAs must sign an attestation stating that each serving line is in compliance with the meal pattern. SFAs are reminded that compliance on each serving line will be assessed during validation and administrative reviews.

Q2. What is considered a reimbursable meal for the Certification Tool?
SFAs must list all reimbursable meals offered on the menu submitted for certification. Each reimbursable meal consists of all required food components: any grain/meat/meat alternates in an entrée and/or side dish, total amount of fruit offered with meal, total amount of vegetables in an entrée and/or side dish, and amount of milk.

SFAs should report all reimbursable meals in the ALL MEALS tab of the Menu Worksheet within the Certification Tool. SFAs should enter the name of the main dish to match the menu submitted for certification.

> Example: If vegetable pizza is called “Garden Power Flatbread” on the menu, the SFA must enter “Garden Power Flatbread” into the Menu Worksheet

Q3. How do SFAs with multiple lines in the cafeteria complete the Certification Tool?
The Menu Worksheet requires SFAs and/or States to enter all reimbursable meals offered on a menu, regardless of how many lines the school cafeteria has. For purposes of 6 cents certification, all reimbursable meals offered within a school cafeteria are considered a menu.

This means that a Menu Worksheet **does not** need to be completed for each line within a school cafeteria; however, SFAs are required to attest that each serving line meets the meal pattern requirements.

While SFAs are not required to submit a menu worksheet for every school cafeteria within the SFA, a separate menu worksheet must be submitted for each distinct menu type offered within the SFA. More information about district menu types can be found in Q24 and Q28 of SP 31-2012.

Q4. How are vegetable quantities entered in the Menu Worksheet?
The amount of vegetables available for a child to select is entered into the ALL MEALS tab of the worksheet in order to assess compliance with the daily and weekly total vegetable requirements. Types of vegetables are not accounted for on the ALL MEALS tab.

On each Daily Tab within the Menu Worksheet, SFAs must indicate for each vegetable subgroup the largest amount that is offered to an individual child.

> Example 1: Monday Choice 1: Spinach Pizza (1/4 cup dark green) or Choice 2: Broccoli Pizza (1/2 cup dark green).
> In this example, the child cannot take both types of pizza, so the SFA should NOT report 3/4 cup dark green vegetable offered on Monday. Rather, the SFA would report the largest amount that can be taken, ½ cup.
>
> Example 2: Monday Choice 1: Spinach Pizza (1/4 cup dark green) or Choice 2: Cheese Pizza (no dark green). School also offers side salad (1/2 cup creditable dark green). In this example, the child could take spinach pizza and a salad and therefore the SFA could report 3/4 cup dark green vegetables.

Q5. What must SFAs submit in SY 2012-13 for breakfast for 6 cent certification?
For SY 2012-13, SFAs using Nutrient Standard Menu Planning must submit a nutrient analysis (using FNS approved nutrient analysis software) of calorie and saturated fat for certification. States should assess compliance based on the current breakfast requirements for calories and saturated fat only.

SFAs that use food-based menu planning in SY 2012-13 need only submit their week of menus and menu worksheets for certification. A nutrient analysis is not required.

The exception to this would be for SFAs that decide to early adopt the new breakfast requirements. These SFAs would have to demonstrate compliance with the requirements that they have been approved to implement. Since the FNS-provided certification tool does not currently include the breakfast requirements for SY 2013-14 or SY 2014-15, State agencies should consult with the regional office for technical assistance in certifying these SFAs on a case-by-case basis.

SFAs should be reminded that if they apply for certification in SY 2013-14, they will be required to demonstrate compliance with the breakfast requirements in effect at that time. Additionally,

breakfast will be part of administrative review starting in SY 2013-14 and SFAs will be expected to be in compliance with the new breakfast requirements on those reviews.

Q6. How should an SFA enter a salad bar meal into the Menu Worksheet?
SFAs offering a salad bar meal that contains meat/meat alternate, grain components and fluid milk on the salad bar along with fruits and vegetables must enter the salad bar meal as a reimbursable meal in the ALL MEALS tab. The predetermined "offered" portion size for total fruit, vegetables, meat/meat alternate, grains and milk must be entered in the appropriate columns in the ALL MEALS tab. A separate meal will need to be completed for each meat/meat alternate and/grain offering if the quantities and crediting are different. Likewise, if the SFA is using the Simplified Nutrient Assessment, each meat/meat alternate and/or grain combination will need to be entered as a separate meal to account for the different calorie and saturated fat amounts.

If the quantities and crediting are the same and the SFA is NOT using the Simplified Nutrient Assessment option of the Certification Tool then one meal with the appropriate meat/meat alternate, grain, fruit, and vegetable quantities offered may be entered.

Q7. Should leftovers be included in the 6 cents tool?
Because in many cases certification documentation is based on planned menus, leftovers should not be included as part of the Menu Worksheet.

Q8. How do SFAs enter meals when multiple main dishes are offered but the same exact sides are available with each of the main dishes?
SFAs must enter each reimbursable meal that is offered throughout the week. In this scenario, each different entrée would be considered its own reimbursable meal (regardless of which sides are offered) and therefore each entrée would be entered in the ALL MEALS tab of the Menu Worksheet.

There is an option to reduce the amount of data entered into the Menu Worksheet if the same vegetable subgroup sides are offered and available to every student multiple times a week. The type of vegetable and quantities may be entered into the VEGBAR tab. On the daily tabs there is a check box to indicate that the same vegetables and quantities are offered on that day. Any vegetables in additions to the ones entered in the VEGBAR tab that are offered may be entered in the Vegetable Subgroup data entry section on each daily tab.

Q9. How do SFAs enter an optional grain offering on the Menu Worksheet?
All grains must be counted toward daily and weekly requirements; therefore, even optional grains must be included with the meal. However, if a menu is designed so that a child has the option to take an additional grain offering (such as a dinner roll), the SFA must enter TWO rows in the ALL MEALS tab, and list both meals on the day this option is offered.

Example: Spaghetti w/sauce and roll (3 oz eq grains)
Spaghetti w/sauce, no roll (2 oz eq grains)

Simplified Nutrient Assessment

Q10. How does the simplified nutrient assessment portion of the 6 cents certification tool assess compliance with the meal pattern?
The simplified nutrient assessment portion of the tool estimates if the menu is meeting the requirements for calories and saturated fats.

SFAs must provide calorie and saturated fat information for all main dish items, side items with grains and/or meat/meat alternates, desserts and condiments. Information can be collected from nutrition labels and product specifications.

Estimates for calorie and saturated fat for milk, fruits, and vegetables are pre-programmed in the simplified nutrient assessment.

Q11. What information should SFAs use when entering calories and saturated fat for main dishes and sides prepared by the SFA in the Simplified Nutrient Assessment?
The Meal Pattern rule clearly states that all schools must develop and follow standardized recipe (please refer to the rule text for additional language on this). Therefore, SFAs are expected to have nutritional information for their specific recipes in order to ensure that such recipes are in compliance with the dietary specifications.

If the SFA does not have access to such information, there are a number of ways they can complete the nutrient assessment. One option is to use the Supertracker tool, a free resource from the Center for Nutrition Policy and Promotion (http://www.choosemyplate.gov/supertracker-tools/supertracker.html). There are other free online tools available.

Because the pre-existing recipes available in some programs, such as Supertracker, do not reflect the actual product/recipe being used, selecting a pre-existing recipe is discouraged. However, the State has discretion to accept such information from a pre-existing recipe if an SFA is able to provide sufficient information indicating the similarity between the pre-existing recipe and the SFA's in-house recipe (e.g. low sodium, low fat cheese lasagna with whole grain pasta). This would be a decision between the SFA and State.

Q12. How should SFAs enter products that are purchased by the SFA?
It is in the best interests of an SFA to provide as accurate information as possible. Therefore for commercial products with labels, SFAs should use the information provided on the labels to complete the Simplified Nutrient Assessment. If a label is not available, the SFA could use online resources to determine calories and saturated fat. Additionally, the SFA could request information from the manufacturer.

Q13. SFA must enter planned offerings of main dishes, sides, desserts, and condiments. Do SFAs enter planned offerings for a single school or for all schools using that menu type?
6 cents certification is based on SFA-level information. SFAs should enter planned offerings on one menu worksheet for all schools using the same menu type.

Q14. Can SFAs use a generic recipe if they offer different sandwiches/salad meals (e.g. salads with meat and or grain offerings included) each day and enter that in to the Simplified Nutrient Assessment as one recipe?

It depends on the crediting contributions for the grains and meat/meat alternates in the sandwiches/salad meal offered.

If each different sandwich constitutes a separate reimbursable meal (different crediting information on meat/meat alternates and/or grains), each sandwich/salad would be listed as a separate meal in the ALL MEALS tab, the quantity of each component would be recorded, and the SFA would then select the sandwiches/salads each day they are offered for the menu worksheet portion. The Simplified Nutrient Assessment would be pre-populated for each sandwich/salad combination and the SFA could enter the calories, saturated fat, and number of servings for each.

Alternately if the crediting is the same for all sandwiches/salads offered, the SFA could enter in one sandwich/salad meal in the ALL MEALS tab with the appropriated crediting amounts for the menu worksheet portion and select the sandwich/salad meal each day it was offered. On the Simplified Nutrient Assessment, SFAs could then either enter the calories and saturated fat for the parts of the sandwich that do not change (bread) in the pre-populated sandwich/salad meal row and then enter for each meat/cheese/grain option the calories, saturated fat, and planned servings in a separate blank rows; *or* create a recipe that combines all of the sandwich offerings into a composite sandwich recipe, report this recipe once in the Simplified Nutrient Assessment, and list the calories/saturated fat and number of servings over the week for that recipe.

Q15. What is the approval process for State agencies wishing the developed their own 6 cents certification tools?
State agencies must submit 6 cents certification tools they develop to their regional office for approval.

State agencies should refer to FNS 6 cents tool specifications when developing their own tools. These specifications can be found at:
http://www.fns.usda.gov/cnd/Governance/Legislation/certtool_checklist.pdf

Q16. Are there examples of 6 cents certification software that has been approved by FNS?
Yes. Approved 6 cents certification software can be found here:
http://healthymeals.nal.usda.gov/SixCentCerification

Q17. Has FNS developed any sample menus and completed certification worksheets?
Yes. The FNS developed sample menu is available at
http://www.fns.usda.gov/cnd/Governance/Legislation/certtool_samplemenu.pdf.

The completed 6 cents worksheet can be found at:
http://www.fns.usda.gov/cnd/Governance/Legislation/nutritionstandards.htm.