

Check in with CANS - Agenda
Monthly Conference Call with DOE-Child and Adult Nutrition Services
January 4, 2018 2:30PM CT/1:30PM MT

Call in number: 866-410-8397, Participant code: 6507733610

*6 = Mute Line; #6 = Unmute Line

Website: <http://doe.sd.gov/cans>

Email: DOE.SchoolLunch@state.sd.us

Summer Feeding:

- January 10, 2018, past and potential SFSP sponsors contact Julie.mccord@state.sd.us with anticipated summer plans. This information is needed for the South Dakota SFSP Management and Action Plan being prepared and is what the funds allocated to South Dakota SFSP are based upon.
- This upcoming summer, FNS is kicking off a new text number. States, sponsors, as well as FNS offices, may promote the new text message service. Folks can text **“Summer Meals” to 97779** to find summer sites once the site finder is ready.
- Seeking new sponsors and reminding returning SFSP sponsors about the upcoming summer training registration available February 1, 2018, on the [DOE SFSP website](#). The SFSP Administrative Training is **required annually**.

Interactive Food Buying Guide: The Food Buying Guide (FBG) is an essential tool for food crediting and yield information for all USDA Child Nutrition Programs (CNP). The FBG is used to obtain information for: Purchasing the required quantities of foods, and determining the contribution each food makes toward the meal pattern requirements. Check out more information on the new interactive FBG at <http://doe.sd.gov/cans/documents/FBG-Flyer.pdf> or sign up for an account at <https://foodbuyingguide.fns.usda.gov/>

The Dirt – News and Notes from FNS’s Office of Community Food Systems

- Sign up for this wonderful resource that highlights local foods, USDA Foods, and Farm to School. Go to <https://www.fns.usda.gov/farmentoschool/e-letter-archive> to find old newsletters and click on the red envelope to sign up to receive future issues.
- **America’s Promise Healthy Schools Fund** is **awarding three to five grants of up to \$150,000 each per year** for two years (for a total of up to \$300,000) to collaborative efforts that display alignment with their vision of communities working to create healthier school environments for all children. Recognizing that school-centered health intersects with many areas outside of education—housing, employment, transportation, and food access— as well as many audiences, efforts should serve as a hub for cross-sector collaboration, youth and community engagement, and broader policy and systemic change. And a proven ability to accelerate positive change for young people in schools and their communities. You can find more information in Issue the Dec. 26 issue of the Dirt or at their website: <http://www.americaspromise.org/healthy-schools-fund>

On-Site Monitoring for Snack Programs: **Reminder**

- The Afterschool Snack program must be monitored two times per year, the first review should have been completed within the first four weeks of operation. The second review should be done any time before the snack program ends for the school year.
- See CANS NSLP memo #36 [Monitoring Form and Update to Snacks After School](#) on the CANS memo website: <http://doe.sd.gov/cans/memos.aspx>

****Action Alert** Child Nutrition Programs: Flexibilities for Milk, Whole Grains, and Sodium Requirements *Interim Final Rule and Comment Period (closes January 29, 2018)***

- This is your chance to have your comments and opinions heard by the rulemakers! Comments on the milk, whole grains, and sodium requirements will be accepted until January 29, 2018. The US Department of Agriculture will use the comments they receive to make adjustments to this interim final rule.
- This flexibility applies to National School Lunch Program (NSLP), Special Milk Program (SMP), School Breakfast Program (SBP), and Child and Adult Care Food Program (CACFP). This interim final rule extends through school year 2018-2019 three menu planning flexibilities currently available to many Child Nutrition Program operators. This interim final rule will become effective July 1, 2018.
- A summary of the flexibilities for SY 2018-2019 are the following:
 - Child Nutrition Program (CNP) operators in the NSLP, SBP, SMP, and CACFP have the option to offer flavored, low-fat (1 percent fat) milk as part of a reimbursable meal for students in grades K through 12, and for SMP and CACFP participants 6 years of age and older. Schools may also offer flavored, low-fat milk as a competitive beverage for sale.
 - Allows State agencies to continue granting an SFA's exemption request to use specific alternative grain products if the SFA can demonstrate hardship(s) in procuring, preparing, or serving specific products that are acceptable to students and compliant with the whole grain-rich requirement.
 - This rule keeps the Sodium Target 1 in place in the NSLP and SBP through the end of SY 2018-2019. The USDA anticipates keeping Target 1 in the final rule through the end of SY 2020-2021. This delay provides SFAs more time to procure and introduce lower sodium food products, allows food industry more time for product development and reformulation, and gives students more time to adjust to school meals with lower sodium content.
- The USDA is seeking comments on the long-term availability of this flexibility and its impact on the original sodium reduction timeline, Targets 2 and 3.
- **Comment Period:** To be considered, **written comments must be received on or before January 29, 2018** by one of the following methods:
 - Federal eRulemaking Portal: Go to <http://www.regulations.gov>. Follow the online instructions for submitting comments.
 - Regular U.S. mail: Send comments to School Programs Branch, Policy and Program Development Division, Food and Nutrition Service, P.O. Box 2885, Fairfax, VA 22031-0885.
 - Overnight, courier, or hand delivery: School Programs Branch, Policy and Program Development Division, Food and Nutrition Service, 3101 Park Center Drive, 12th floor, Alexandria, Virginia 22302.

****Action Alert** Food Crediting in Child Nutrition programs:** US Department of Agriculture (USDA) Food and Nutrition Service (FNS) **Comments will be collected until Feb. 12, 2018**

- **What is food "crediting?"**
 - Crediting is the process established by FNS to determine how individual foods contribute to the Child Nutrition Programs' meal patterns. A food is considered creditable when it meets the minimum standards that count toward a reimbursable meal or snack. Generally, this means foods are grouped into categories of similar foods which are credited in a similar way.
 - Crediting information is conveyed through various resources such as FNS' Food Buying Guide for Child Nutrition Programs and other technical assistance materials.
 - The overall nutrient profile of a food is a primary consideration.
- **Applies to:** National School Lunch Program (NSLP), School Breakfast Program (SBP), Child and Adult Care Food Program (CACFP), and Summer Food Service Program (SFSP) collectively these are known as the FNS Child Nutrition Programs.
- **Information that FNS is collecting includes:**
 - General comments about the crediting process.
 - Comments on the crediting of several specific food products.
 - FNS is especially interested in understanding both the possible benefits and any negative impacts associated with potential changes to how certain foods may or may not credit.
- **Full document can be found at:** <https://www.federalregister.gov/documents/2017/12/14/2017-26979/food-crediting-in-child-nutrition-programs-request-for-information>

- **Submit comments** through the Federal eRulemaking Portal at <http://www.regulations.gov>. Follow the online instructions for submissions.
- See list of FNS questions after call agenda/minutes.

Purchasing Equipment in the School Nutrition Program - [FNS memo SP31-2014 State Agency Prior Approval Process for School Food Authority Equipment Purchases](#)

- Child Nutrition Program (CNP) operators must obtain the prior written approval of the State agency before incurring the cost of a capital expenditure from the Food Service account (2 CFR Part 225, Appendix B, section 15). For purposes of this requirement, OMB guidance and Department of Agriculture (USDA) regulations define as “equipment” any item of non-expendable personal property with a useful life of a year or longer and an acquisition cost which equals or exceeds the Federal per-unit capitalization threshold of \$5,000 or a lower threshold set by State or local level regulations.
- In the case of the School Meal Programs, the State agency’s prior review and approval provides reasonable assurance that the asset’s acquisition cost is necessary for program purposes and the SFA’s nonprofit school food service account can absorb the cost. The CANS office recently received approval from our FNS Regional Office (RO) to develop a list and criteria for capital assets typically purchased by SFAs (e.g., convection ovens, steamers, reach-in or walk-in refrigeration equipment, etc.). Once the CANS memo is finalized and published, any equipment listed on the approved equipment list, may be purchased by an SFA, following proper Federal, State, or local procurement procedures, as applicable, without submitting a request to the State agency for approval.

New CANS memo SNP 241-1 Child Nutrition Program Equipment Purchases

- This CANS memo establishes state specific guidance on program equipment purchases made using Child Nutrition Program funds and an approved equipment purchase list as outlined in [memo SP31-2014 State Agency Prior Approval Process for School Food Authority Equipment Purchases](#). CANS memos are posted on the CANS website under memo number SNP 241-1 <http://doe.sd.gov/cans/memos.aspx>.
- This CANS memo also applies to the Child and Adult Nutrition Services and the Summer Food Service Program (CACFP 241-1, CACFP DCH 241-1, SFSP 241-1) in addition to all the School Nutrition Programs (National School Lunch Program, School Breakfast Program, Fresh Fruit and Vegetable Program, and Special Milk Program).
- “Equipment” is any item of non-expendable personal property with a useful life of a year or longer and an acquisition cost which equals or exceeds the Federal per-unit capitalization threshold of \$5,000 or a lower threshold set at the local level.
- If you need to purchase equipment and that equipment is listed on the approved equipment purchase list, the School Food Authority (SFA) may purchase those equipment items, following proper Federal, State, or local procurement procedures, as applicable, without submitting a request to the State agency for approval.
- If you need to purchase equipment that is not on the list and equals or exceeds the Federal or local capitalization threshold (whichever is more restrictive), please send the CANS office a written/emailed request to purchase the equipment. Include all information necessary to give the State agency a reasonable assurance that the asset’s acquisition cost is necessary for program purposes and the SFA’s nonprofit school food service account can absorb the cost.
 - For purchases that are below the Federal per-unit capitalization threshold of \$5,000 or a lower threshold set at the local level, no written preapproval is required.
- The CANS office must approve such a request before you can use funds from the nonprofit food service account or any Child Nutrition Program funds to pay for the equipment.

Procurement **Reminder**

- This is the time of year many schools start working on the procurement process for the next school year! Now is when you need to be looking at your menu and what changes you’d like to make. Once you feel your menu is ready, then focus on developing your specifications to get the best product. Examples of various specifications are located on our CANS website – www.doe.sd.gov/cans/ under the Procurement title.

- This is also a good time to review your Food Service department's **Procurement Policy**. This is a **requirement** for all schools and agencies that receive funding from any one of the USDA Child Nutrition Programs (NSLP, SBP, SMP, CACFP, SFSP, etc.) offered through CANS. Many schools already have a procurement policy on hand for items they routinely purchase, such as books, desks, computers, paper, etc. That policy is a good place to start in designing your policy for the Food Service Department, but that plan must include purchases made using food service funds.
- Items that should be addressed within your Procurement Policy include the following:
 1. What are the procurement thresholds (dollar amounts for informal versus formal procurement methods) for your school?
 2. Fair and open competition – all vendors will get the same information. Vendors who help write specifications or any part of the bid documentation will not be considered for the contract they helped write specifications for.
 3. What is your geographic preference for unprocessed locally grown or locally raised products? (optional)
 4. Buy American clause (required for School Nutrition Programs)
 5. Standard of Conduct (also known as the Integrity Clause) for school employees involved in the awarding or administration of contracts awarded using Federal Funds.
 6. Discounts, Rebates, Credits – What is the standard process for vendors to show and support costs, discounts, rebates and credits? And that those discounts, rebates, and credits stay within the food service program.
 7. Records Retention – How long does your school retain records and which records are you retaining? At least three years after the year is closed.
 8. Bid Protest Procedures – How will your school handle and bid protests that may happen?
 9. Any other information that is necessary to represent the school's procurement process and policies.

USDA Memo FD-107: Donated Food Storage, Distribution, and Product Dating (Revised Nov. 21, 2017)

- As a general rule, recipient agencies should use a first-in-first-out (FIFO) system of inventory management by marking food cases or other containers with the date of receipt at the storage facility. Agencies should also take note of the product dates provided by the manufacturer.
- Proper ordering should include a review of your prior use, current menu needs, and anticipated usage. Products orders should not exceed a six month need.

SNA SD University Upcoming Trainings

- School Nutrition Association of South Dakota (SNA SD) has released registration information for their upcoming spring SNA SD University trainings. Training dates/locations and topics are as follows:
 - Wall, SD—Saturday, March 3rd (9:00am-4:00pm MT) - Culinary Math
 - Pierre, SD—Saturday, March 10th (9:00am-4:00pm CT) - Managing Food Allergies in Schools
 - Yankton, SD—Saturday, March 10th (9:00am-4:00pm CT) - Culinary Math
- You can [click here](#) to register for any of the upcoming trainings. Training is free to SNA members. Nonmembers pay the price of a membership and then become a member if they want to attend training. Registration is due January 17th.

Food Waste Reduction Webinar

- Environmental Protection Agency (EPA) Region 8 invites school administrators and food service personnel to attend a customized webinar all about food waste reduction in schools. This FREE webinar, designed especially for K-12 administrators/principals is on **Thursday, February 1st from 10:00-11:00 am CT/9:00 - 10:00 am MT**. [Click here to register](#).
- Reducing wasted food is a hot topic these days. This webinar is CUSTOMIZED for school administrators to learn more about this topic to possibly save money, connect with the community, and support sustainability for your school/district, all by reducing food waste.

- For additional information, please feel free to contact the contractor, Katrina Brink, *Sustainable Food Management Consultant for EPA Region 8, RMC Consultants, (303) 505-6575, k12foodwasteworkshop@gmail.com*.
- Guidebook to Conducting Student Food Waste Audits: A Resource for Schools is posted on the CANS NSLP website: <http://doe.sd.gov/cans/nslp.aspx> Under section *Useful Resources and Links* >> School Food Waste Audit Guide. Contains Helpful food waste prevention ideas in addition to putting together a food waste audit.

January Nutrition Bulletin

- The January Nutrition Bulletin has been posted and can be found at the following link, along with previous month's nutrition bulletins: <http://doe.sd.gov/cans/nbulletin/index.aspx>
- If your school is doing anything interesting that you would like to share, you can send articles to the <mailto:doe.school lunch@state.sd.us> email for posting in the monthly bulletin.

Professional Standards Reminder: Any learning or training you receive about any aspect of the School Nutrition Programs can be counted as training time towards the professional standards annual training requirement.

Please retain documentation to show what topics were trained. For example, agenda, topics, handbook, certificate, etc. And record training on a Tracking Tool – we suggest using the [SD Tracker Tool](#) posted on the CANS NSLP website.

This Conference call was 60 minutes long and can credit for 60 minutes of training.

Learning Topics discussed during this call were:

- 3000 Administration: 3200 Program Management - 60 minutes

Food Crediting in Child Nutrition programs

Comments are being collected until Feb. 12, 2018 at <http://www.regulations.gov>

II. Questions: Factors To Determine Crediting

FNS currently considers the following factors when making crediting decisions:

- *Volume or weight of the food.*
 - All meats/meat alternates and grains are credited in ounces.
 - Fruits, vegetables, and fluid milk are credited based on volume served.
 - However, dried fruit credits at twice the volume served and raw, leafy greens credit as half the volume served.
 - Additionally, tomato puree and tomato paste credit as if they were reconstituted, instead of as volume served.
- 1. Is it appropriate to continue to credit foods based on the volume or weight served, with the few exceptions discussed above? Why or why not?
- 2. What are the benefits and negative impacts of having different crediting values for different forms of vegetables and fruits?
- *Overall nutrient profile.* Foods in each component are based on a range of nutrients instead of an individual food's nutrient profile. For example, foods in the meats/meat alternates component are grouped based on a collection of nutrients that include protein, B vitamins, selenium, choline, phosphorus, zinc, copper, and vitamins D and E. Generally, FNS has not considered fortification in the creditability of foods.
- 3. Should fortification play a role in determining if and how a food is credited in the Child Nutrition Programs? Why or why not?
- 4. Is the presence of certain nutrients more important than other nutrients when determining if and how a food credits in the Child Nutrition Programs? Why or why not?
- *Federal standards of identity and industry standards of production.* Many creditable food products in the Child Nutrition Programs have Federal standards of identity or industry standards for production. Standards of identity assist FNS in crediting because they ensure food products with the same name have the same characteristics and, therefore, make a consistent contribution to the meal patterns.
- 5. If a food product does not have a Federal standard of identity or industry standards for production, how could these food products credit in the Child Nutrition Programs? Please be as specific as possible.
- *Customary use of the food product.*
 - Some foods are generally consumed as snacks and, therefore, have not been considered appropriate for service in the Child Nutrition Programs.
 - In other cases, the volume of food required to meet the minimum serving size would be unreasonably large.
 - In other cases, such products do credit. For example, tortillas and tortilla products, such as taco shells, may credit as a grain item in the Child Nutrition Programs because in certain cultures they are served as the grain component of a meal. (Please see below for more information about snack-type foods.)
- 6. Is it appropriate to continue to consider the customary use of a product when determining how a food credits in the Child Nutrition Programs? Why or why not?

- *The role of the Child Nutrition Program in teaching children healthy eating habits.* Meals and snacks served in the Child Nutrition Programs act as a teaching tool for children by visually demonstrating how to build a healthy, balanced meal with the key food groups and amounts recommended by the Dietary Guidelines. For example, although pasta made from lentils has a standard of identity and may be used in all Child Nutrition Programs, in order for the pasta to credit as a vegetable, it must be served with another vegetable, such as broccoli or tomato sauce, to help children recognize the vegetable component. Likewise, lentil pasta can credit as a meat alternate if it is served with another meat/meat alternate, such as chicken or black beans.
7. What role should such educational considerations play in determining the creditability of a food in the Child Nutrition Programs?
 8. Are there other factors FNS should consider in determining how foods credit in the Child Nutrition Programs? Why or why not?
 9. Are there additional ways FNS can make the crediting process more simple, fair, or transparent? Please be as specific as possible.

Foods From the Meat/Meat Alternate Component

- *Shelf-stable, Dried or Semi-dried Meat, Poultry, and Seafood Snacks, and Surimi:*
 - Currently, shelf stable, dried and semi-dried meat, poultry, and seafood products, such as beef jerky or summer sausage, (collectively referred to as dried meat/poultry/seafood snacks) currently do not credit towards the Child Nutrition Programs' meal patterns. These foods have a Federal standard of identity that varies widely, there is a wide variety of industry standards for production, and they are typically seen as snack-type foods. However, FNS understands these products may be appealing to some Child Nutrition Program operators because dried meat/poultry/seafood snacks are shelf stable, work well with alternative meal delivery methods, such as breakfast in the classroom and lunches for field trips, and provide more choices to menu planners and children.
 - Similarly, surimi, which is whitefish that is processed to resemble more expensive seafood and labeled as "imitation," such as imitation crab, does not credit towards the Child Nutrition Programs' meal patterns. Surimi lacks an FDA standard of identity and there is a wide variety of industry standards for production. Additionally, foods labeled as "imitation" may have significantly different nutrition profiles than the foods they are meant to replace. To assist reviewers in adequately compiling public feedback, please provide separate comments on dried meat/poultry/seafood snacks, and imitation crab.
10. Are Child Nutrition Program operators currently offering any of these foods as an extra item that does not contribute to the Child Nutrition Programs' meal patterns? If so, which ones?
 - 10a. If yes, how are they being served (e.g., as an extra component at snack) and how often?
 11. Should FNS allow any of these foods to contribute to the Child Nutrition Programs' meal patterns? Why or why not?
 12. If any of these foods are allowed to contribute to the Child Nutrition Programs' meal patterns, how should they be credited? Be as specific as possible, such as the volume or weight needed, or a specific nutrient content.
 - 12a. Is there an ingredient or processing method that would qualify or disqualify these products?

13. If any of these foods are allowed to contribute to the Child Nutrition Programs' meal patterns, would Child Nutrition Program operators incorporate these foods into menus to meet the meats/meat alternates requirement? Why or why not?

13a. If yes, how would they be served (e.g., at snack, as part of a reimbursable lunch)?

14. If any of these foods are allowed to contribute to the Child Nutrition Programs' meal patterns, how would this impact the Child Nutrition Programs, including its participants and operators? What are the potential benefits and negative impacts?

- *Yogurt:*

- Yogurt may be used to meet all or part of the meats/meat alternates component.
- It may be plain or flavored, unsweetened or sweetened, traditional (non-strained or non-thickened) or Greek or Greek-style (high protein, strained or thickened).
- Four ounces (weight) or 1/2 cup (volume) of traditional or high protein yogurt is credited as one ounce equivalent of meat alternate.
- This crediting was based on public comment (62 FR 10187, April 1997) and acknowledges the relatively low levels of iron and niacin in yogurt compared to other foods from the meats/meat alternates component.
- Since then, high protein yogurt has increased in popularity and availability. As such, FNS was asked to consider whether it would be beneficial to allow a lesser volume of high protein yogurt to credit toward the meat/meat alternate component compared to traditional yogurt. The rationale for this request was that high protein yogurt contains a higher level of protein per ounce versus traditional yogurt. Currently, crediting has not been based on an individual food's nutrient profile, or any one nutrient. That is, the contribution of a food towards the meat/meat alternate requirement is not based solely on the grams of protein. For example, different varieties of meat (e.g., lean beef versus turkey) are not evaluated separately based on their protein content.

15. Are Child Nutrition Program operators currently offering high protein yogurt as part of a reimbursable meal?

16. Should FNS create a separate crediting standard for high protein yogurt that is different than the crediting standard for traditional yogurt for the Child Nutrition Programs? Why or why not?

17. If high protein yogurt is allowed to contribute differently to the Child Nutrition Programs' meal patterns than traditional yogurt, how should high protein yogurt be credited? Be as specific as possible, such as the volume or weight needed.

17a. Is there an ingredient or processing method that could qualify or disqualify a particular yogurt from crediting in the Child Nutrition Programs (e.g., a particular thickening agent could disqualify a high protein yogurt)?

18. If high protein yogurt is allowed to contribute differently to the Child Nutrition Programs' meal patterns than traditional yogurt, would Child Nutrition Program operators take advantage of using it to meet the meats/meat alternates requirement? Why or why not?

18a. If yes, how would Child Nutrition Program operators serve it (e.g., at snack, as part of a reimbursable lunch)?

19. If high protein yogurt is allowed to contribute differently to the Child Nutrition Programs' meal patterns than traditional yogurt, how would this impact the Child Nutrition Programs, including its participants and operators, as well as food manufacturers? What are the potential benefits and negative impacts?

Other Foods Not Currently Creditable

- In the past, FNS has chosen not to credit a small number of other foods in the Child Nutrition Programs because these foods do not meet the requirement for any food component in the Child Nutrition Programs' meal patterns.
 - For various reasons this has occurred, including being considered snack-type foods, lacking a standard of identity, or because the volume of food required to meet the minimum serving size would be unreasonably large.
 - For example, foods such as popcorn, vegetable chips (does not include chips made from grain such as tortilla chips), bacon, and tempeh are currently not creditable for the aforementioned reasons.
 - A list of various foods that do not currently credit in the Child Nutrition Programs is available in FNS' Food Buying Guide for Child Nutrition Programs under "Other Foods" (see <https://fns.usda.gov/sites/default/files/tn/fbg-section5-other.pdf>).
 - Comments on any foods currently not creditable in the Child Nutrition Programs are welcome, using the following questions as a guide.
20. Are Child Nutrition Program operators currently offering any of these foods as an extra item that does not contribute to the Child Nutrition Programs' meal patterns? If so, which ones?
 21. Should FNS allow any of these foods to contribute to the Child Nutrition Programs' meal patterns? Why or why not? If so, which ones?
 22. If any of these foods are allowed to contribute to the Child Nutrition Programs' meal patterns, how should they be credited? Be as specific as possible, such as the volume or weight needed, or a specific nutrient content.
 - 22a. Is there an ingredient, processing method, or nutrient standard (e.g., sodium content) that should qualify or disqualify any of these foods?
 23. If any of these foods are allowed to contribute to the Child Nutrition Programs' meal patterns, would Child Nutrition Program operators incorporate them into menus to meet the Child Nutrition Programs' meal patterns? Why or why not?
 - 23a. If yes, how would they be served (e.g., as part of a reimbursable snack)?
 24. If any of these foods are allowed to contribute to the Child Nutrition Programs' meal patterns, how would this impact the Child Nutrition Programs, including its participants and operators, as well as food manufacturers? What are the potential benefits and negative impacts?
 25. Are there additional products not mentioned in this request for information that are currently not creditable, but you would wish to provide comments on? Please be as specific as possible.