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ALERT: USING NUTRIENT STANDARD MENU PLANNING (NSMP) OR ASSISTED NSMP

Federal Regulations (7 CFR 210.10 of the National School Lunch Program) require school food authorities (SFAs) to provide nutritious, well-balanced meals for all children they serve. Compliance with nutrition standards including appropriate nutrient and caloric levels is determined by averaging lunches planned to be offered over a school week. Under any menu planning approach, schools must plan and produce at least enough food to meet the appropriate caloric and nutrient levels for the ages/grades of the children in the school.

The Nutrient Standard Menu Planning (NSMP) approach is based on the nutrient composition of foods, rather than on required components like the food based menu-planning options. This results in SFAs having greater latitude in the food types and portion sizes offered to students.

Under the NSMP or the Assisted NSMP, SFAs are required to analyze menus prior to meal service using USDA-approved software. Meals must be analyzed in accordance with the nutrient needs of the ages/grades of the students they serve, and must contain, at a minimum, an entrée, fluid milk, and one side item. The nutrient analysis must consist of all items offered as part of the reimbursable meal, including condiments, and must be based on accurate production records and standardized recipes. Commercially prepared items used in the menu (i.e., chicken patties, hamburgers, chicken nuggets, etc.) must be entered into the USDA-approved software's product database, so that the actual nutrient contribution of foods used can be analyzed.

Current laws and regulations no longer permit an SFA the option to use simple averages in their nutrient analysis. All meals planned under NSMP must be based on weighted averages, ensuring that all entrée and side items are weighted appropriately in the nutrient analysis. For example, if broccoli is prepared for 10 of the 100 students you serve, the contribution in the nutrient analysis should be 10, not 100. If you serve three entrees, each should reflect the amount prepared based on previous production and student selection, rather than giving all equal status.

The nutrient analysis must be completed prior to meal service so that the SFA can ensure that all caloric and nutrient needs of the students they are serving are being met. If an SFA finds that the nutrient analysis yields "corrections required" on the summary page, the SFA is required to adjust the menu so that all nutrient standards are being met prior to meal service. For example, if the nutrient analysis yields "correction required – calories low," the food service director must revise the menu to increase portion sizes, or substitute a higher calorie entrée, and/or any of a number of

alternatives to increase the caloric content of the meal. If the nutrient analysis yields “correction required – saturated fat high,” the food service director must revise the menu to substitute a lower fat entrée, or increase the portion size of a low fat item, and/or another alternative to lower fat. A reanalysis must be completed prior to the meal service so that each week’s nutrient analysis appropriately meets the caloric and nutrient needs of the students in the school. You can’t just be “close” to the requirements if you have selected NSMP or Assisted NSMP as your menu plan.

Beginning in February 2004, all schools using NSMP or Assisted NSMP must ensure that all menus analyzed meet all of the caloric and nutrient needs of the students they serve. A completed nutrient analysis cannot contain any “corrections required,” as this would indicate that the menu does not meet the nutrient and/or caloric needs of the students you are serving, and therefore would not meet meal pattern requirements. If you are receiving a Coordinated Review Effort (CRE) after February 2004, and Child Nutrition Program Staff review your nutrient analysis and find “corrections required,” you will be evaluated using the Traditional Menu Plan (TMP) since you are not meeting meal pattern requirements for NSMP or Assisted NSMP. As you know, the TMP is based on required components in required minimum quantities, which differ for students in different age/grade groups. You will no longer be considered an SFA using NSMP. If your menu does not include all components in the minimum quantities required by the TMP, you could be cited in the CRE for a Performance Standard 2 violation, which states that all meals served to eligible students must meet meal pattern requirements. Corrective action could include a revision to the nutrient analysis and the daily menu to bring the school into compliance with the NSMP requirements, revising your menu planning option, and may include fiscal sanctions for meals that are missing items/components under the TMP.

SFAs using food service management companies are responsible for ensuring that the management company completes the nutrient analysis using the above criteria. If you receive a nutrient analysis that contains “corrections required,” you should require the management company to revise the nutrient analysis, and the menu, so that the meals, averaged over the week, meet the caloric and nutrient needs of the students you serve. In addition, it is your responsibility to ensure that the nutrient analysis you receive from the food service management company reflects the actual offerings and portion sizes in each of your meal sites. Do not accept one blanket nutrient analysis for the entire SFA, as it is very unusual for an SFA with multiple sites to be serving the exact same menu in the exact same quantities in different meal sites. The SFA is ultimately responsible for the integrity of the nutrient analysis, and fiscal sanctions will be imposed on the SFA for menus that do not meet NSMP or Assisted NSMP requirements during a CRE.

Please refer to **The Menu Planner for Healthy School Meals** manual for the specific nutrient standards and age/grade groups.

If you have any questions please contact Sandy Sheedy at 518-473-1525 or ssheedy@mail.nysed.gov.