

- [FAQs: Food Safety and Menu Compliance Monitoring](#)
- [FAQs: Nutrition Services](#)

FAQs

FOOD SAFETY AND MENU COMPLIANCE MONITORING

I. Questions about the Person-In-Charge (PIC)

Q: If meals are prepared by a provider and delivered in bulk or in individual trays, is there a requirement for the Person-in-Charge (PIC) to be present at the delivery site?

A: The FDA Food Code, now adopted by the Pennsylvania Department of Agriculture, requires the Person-in-Charge at all meal sites during meal preparation and during the meal service.

Q: Can a volunteer be a PIC?

A: A volunteer may be the PIC.

Q: Can the AAA train the PIC?

A: There are sanitation training resources and materials for the AAA to train the PIC on the PDA website at <http://www.portal.state.pa.us/portal/server.pt?open=514&objID=615998&mode=2> under Food Service Safety Certification Resources. Documentation of sanitation education is needed prior to an individual becoming the PIC. This applies to volunteers or staff.

II. Questions about Monitoring

Q: If a county has more than one provider, does each provider need to be monitored?

A. Each kitchen needs to be monitored annually and each meal served by an individual provider needs to be monitored by a dietitian two times per year.

Q: Does a provider using a kitchen in a different county need to be monitored?

A. Each provider needs to be monitored. The monitoring function can be coordinated with other counties being served from the same kitchen.

Q: How should an out-of-state kitchen be monitored?

A: The AAA shall request an annual sanitation report done at the food service vendor kitchen by the responsible licensing and inspecting agency. Meal portions shall be monitored by requesting meals be sent to the AAA monitoring representative to assess menu compliance of meals served.

Q: Do kitchens serving Adult Day Centers (ADC) need to be monitored?

A: All kitchens providing meals funded through PDA shall be monitored for food safety and menu compliance. The monitoring shall focus on the meals being served to the ADC.

FAQs

NUTRITION SERVICES

I. Questions about Take-Out Meals and Foods

Q: Can you provide a defined list of hazardous foods?

A: Hazardous foods are those that require time and/or temperature control to keep them safe for human consumption. Examples would include protein foods, dairy foods, cooked rice and pasta, some vegetables and opened fruit, among a long list of other items. All foods are considered hazardous unless they meet the non-hazardous foods definition on Page 11 of APD 15-03-02.

“Allowable foods include whole fresh fruits, bread, pastries, cookies and baked goods, unopened packaged items (such as crackers or breadsticks) and unopened shelf stable single serve containers of items such as fruit or applesauce or fruit juices from a participant’s own plate.”

Other foods may be considered non-hazardous if the AAA dietitian or dietary manager specifies that a particular food is non-hazardous.

Q: Do off-site activities count as a congregate meal and will they be reimbursed?

A: If the meal meets the definition of a congregate meal by providing an opportunity for social engagement then the meal counts as a congregate meal and is reimbursable. If a senior community center chooses to have an off-site meal as part of a senior community center activity, the meal is considered a congregate meal.

Q: Why has the take-out meal program been eliminated?

A: The take-out meal program has not been eliminated. Take-out meal programs are permitted and meals are to be charged on a private pay basis. Since take-out meals are not served in a congregate setting as specified by the Older Americans Act (OAA), take-out meals are not to be entered into SAMS because the federal government classifies them as non-ENP meals. To assure that private pay and ENP meal funds are not comingled, appropriate accounting procedures must be in place.

II. Questions about Meal Donations

Q: Can you please clarify the statement regarding solicitation of donations and poverty level?

A: The statement originated from the Older Americans Act of 1965 as amended in 2006 (Public Law 109-365) Section 315 - CONSUMER CONTRIBUTIONS (b) VOLUNTARY CONTRIBUTIONS:

“Voluntary contributions shall be allowed and may be solicited for all services for which funds are received under this Act if the method of solicitation is non-coercive. Such contributions shall be encouraged for individuals whose self-declared income is at or above 185 percent of the poverty line, at contribution levels based on the actual cost of services.”

Food stamps are provided to consumers at or below 130% of poverty and are no longer used as a donation source.

Q: Can Food Stamps still be accepted?

A: Because Electronic Benefits Transfer (EBT) cards and Food Stamps eliminate the possibility of confidential donations, they are no longer an acceptable means to donate for a meal. EBT cards can be used for private pay meals.

Q: Can we take down the signs requesting Food Stamps as a donation?

A: Signs requesting Food Stamp/SNAP donations are to be removed.

III. Questions about Recording in SAMS System

Q: When extra meals are available at a site and there are eligible walk-in clients, can the meal be served to these consumers and then be recorded as an ENP meal?

A: A leftover or extra meal may be served and recorded if it is a complete meal served to an eligible consumer. Meal programs may offer seconds to be consumed on site, but meals served as seconds to the same individual may not be recorded twice.

Q: Will instructions on how to submit meals be distributed once the APD is approved so that everyone will be on the same page?

A: Yes. The process has not changed with how meals are to be entered into SAMS. Detailed instructions will be provided so that the recording and reporting of information is standardized.

Q: When may a referral for nutrition counseling be entered into SAMS?

A: Counseling includes options and methods for improving nutritional status and is performed by a dietitian in accordance with state law and policy. When there is documentation that the consumer has had counseling by a AAA dietitian or a community dietitian, this may be entered in SAMS.

Q: Is nutrition education entered through the Prime Time Health section in SAMS?

A: Yes.

IV. Questions about Utilizing a Dietitian

Q: Will the Nutrient Analysis Program spreadsheet be updated to incorporate the new criteria?

A: The Nutrient Analysis Program spreadsheet will be updated and will be available on PDA's website.

Q: Will each AAA need to employ a dietitian?

A: A dietitian is required to provide nutrition monitoring for each type of meal served twice per year. PDA will maintain contact information for local dietetic associations and for dietitians willing to contract with AAAs.

Q: Is it true that the food service company's dietitian will no longer be able to monitor?

A: The food service company's dietitian can continue to approve menus and develop education materials; however, they will not be performing the monitoring. Monitoring of food safety and menu compliance does not need to be done by a dietitian. The AAA shall designate any AAA staff or contractor to complete the monitoring visit. The AAA representative cannot be actively engaged in the provision of the preparation or meal service in the site being monitored. Training will be available on the PDA website.

Q: Clarify the need for a dietitian to monitor programs.

A: A dietitian is required to monitor food, menus, and contract compliance for each type of meal served (congregate, home delivered meal (HDM), breakfast, etc.), at a single location (not for each location served). The dietitian shall observe the meal as it is served, check for nutrient compliance and quality, and document participants feedback when possible. The dietitian does not need to observe the meal preparation site. The dietitian cannot be actively engaged in the provision of the meal service at the site being monitored.

Q: What costs will be associated with using a dietician to monitor?

A: For the program offering a traditional congregate meal and a traditional home delivered meal with no other meals being claimed, there would be four annual monitoring visits required. For example: a dietitian would take about three hours per program and the average consulting rate would be about \$50.00 per hour. So the total annual cost could be about \$600.00 plus mileage.

V. Questions about Menus

Q: Will the new menu requirements result in an increased raw food cost?

A: The foods required in the traditional menu plan were designed to allow for increased menu flexibility and decreased cost. The traditional menu plan allows for the following options to decrease cost:

- *Decrease in total grain servings and the elimination of the whole grain requirement.*
 - *The grain requirement has decreased by three servings per week in a five-day-a-week program. The cost of a slice of bread is typically \$.11 to \$.16 and other specialized grain products may cost more.*
- *Elimination of mandatory fats and mandatory desserts.*
- *Decrease in the minimum daily calories.*

Fruit and vegetable servings are now defined as drained servings to assure a full serving size and may increase cost. Protein has remained constant.

The food based menu plan may be more costly. To assure nutrient needs are met, there is an increased fruit/vegetable requirement, a requirement for fifty percent of grains to be whole grains, and a requirement for a high potassium food to be served with a high sodium meal. This pattern does eliminate the need for computer based nutrition analysis which may offset food cost. The AAA can determine the menu plan that best meets the needs of their program.

Q: Can a AAA continue to serve foods that are now considered optional?

A: The AAA may continue to serve these items, but the optional foods must still be recorded as part of either the nutrient analysis or the food based plan. The inclusion of these foods shall not exceed the allowance for fat, calories, or sodium.

Q: Is an email sufficient documentation of menu item substitution?

A: An email is sufficient and must go to the AAA representative and approval received prior to delivering the substitution.

Q: Do menus have to be sent to home delivered meal clients?

A: Menus shall be provided to home delivered meal consumers upon consumer request.

Q: Is a selective menu mandatory?

A: No. Selective menus, as well as ethnic menus, vegetarian menus, and other food styles are all optional. Each AAA may determine the menu style that best meets the need of their nutrition program. Menus do need to be changed a minimum of two times per year to allow for seasonal variability.

VI. Questions about the DETERMINE Your Nutritional Health Assessment Screen

Q: Will the DETERMINE Your Nutritional Health Screen be developed in any languages other than Spanish?

A: The screen is available in Russian, Creole, and Chinese courtesy of New York State at: <http://www.nyc.gov/html/dfta/html/health/nutritional.shtml>.

Q: How will the DETERMINE nutrition risk screen be done?

A: The DETERMINE questions will be incorporated into the two assessment tools that will be used, so there will be very few instances when the paper form will need to be used for meal consumers. These assessments will be done annually and will meet the annual requirement for the administration of the DETERMINE checklist.

Q: When will new food guidelines go into effect?

A: The effective date is January 1, 2015. AAAs are to begin the process of amending contracts and document their efforts toward becoming fully compliant by July 1, 2015. A training module will be available in January 2015 to assist with the transition and to implement the APDs.