

Food Safety and Menu Compliance Monitoring Aging Program Directive (APD) 15-03-01 Focus Questions:

Questions about the Person-In-Charge (PIC)

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

Yes, the FDA Food Code, now adopted by the PA Department of Agriculture, requires a Person-in Charge at all meal sites during meal preparation and during meal service.

Can a volunteer be a PIC?

Yes, a volunteer may be the PIC.

Can the AAA train the PIC?

Yes, there are resources for this on the PDA website at under Foodservice Safety Certification Resources. These provide sanitation training resources and materials. The PIC shall have documented sanitation education prior to becoming the PIC. This applies to volunteers or staff.

Questions about Monitoring

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

Yes, each kitchen needs to be monitored annually by the AAA representative and each type of meal served by an individual provider needs to be monitored by a dietitian two times a year.

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

Yes, each provider needs to be monitored. The monitoring function can be coordinated with other counties being served from that kitchen.

How should an out of state kitchen be monitored?

The AAA may request an annual sanitation report and monitor meal portions in the county. This may require ordering meals to the AAA for monitoring by the AAA representative.

Do kitchens serving adult day centers need to be monitored?

All kitchens providing meals funded through PDA shall be monitored for food safety and menu compliance. The monitoring shall focus only on the meals being served to the adult day center.

How should AAAs monitor meals that are being shipped to consumers from other states?

When a program purchases prepared meals in another state, the AAA shall request an annual sanitation report for the food service vendor's kitchen from the responsible licensing and inspecting agency.

To monitor for both nutrition compliance and menu compliance for programs providing meals by consumer choice a menu analysis for all meals offered shall be submitted. Each menu offered shall provide:

- *3 ounces of edible protein portion in a minimum 25 gram protein meal*
- *20 mg of vitamin C*
- *250 micrograms of vitamin A*
- *7 grams of fiber*
- *350 mg of calcium*
- *No more than 1300 mg of sodium*
- *No more than 35% of total calories coming from fat*
- *No less than 600 calories and no more than 750 calories*

(The weekly nutrient averages cannot be guaranteed because participants have the option of choosing a menu for these meals.)

Meal portions shall be monitored by requesting meals be sent to the AAA monitoring representative to assess menu compliance of meals served.

Nutrition Services APD 15-03-02 Focus Questions:

Questions about Take-out Meals and Foods

Can we have a defined list of hazardous foods?

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 as defined on page 11 of the APD.

“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.

Do off-site activities count as a congregate meal and will this be reimbursed?

Yes, the meal must meet the definition of a congregate meal by providing an opportunity for social engagement. If a senior community center chooses to have an offsite meal as part of a senior community center activity, this is considered to be a congregate meal.

Why has the take-out meal program been eliminated?

The “Take-out Meal program” has not been eliminated. **Take-out meals can be charged on a private pay basis.** Because take-out meals are not served in a congregate setting, as defined by the OAA, they cannot be entered into SAMS as ENP meals. Take-out meals entered as ENP meals are out of federal compliance. To assure that private pay and other meal funds are not comingled, appropriate accounting procedures must be in place.

Is it a correct assumption that all leftover foods must be thrown out?

Leftover meals may be taken out of the center if they have been maintained at an appropriate temperature and are sent in single service containers. These meals, or foods, cannot be recorded in SAMS as an ENP meal. The cost of these foods or full meals (now considered a take-out meal) shall be determined by the AAA and shall be tracked via appropriate accounting measures. It is permissible to offer these foods or full meals at no cost.

Questions about Meal Donations

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

The Older Americans Act of 1965 As Amended In 2006 (Public Law 109-365) Section 315 - CONSUMER CONTRIBUTIONS (b) VOLUNTARY CONTRIBUTIONS states the following:

“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 therefore should not be encouraged as a donation source.

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

Yes.

Can we accept Food Stamps at all?

Yes, EBT cards (or Food Stamps) can continue to be used for private pay meals. EBT cards are no longer an acceptable means to donate for a meal because the EBT cards eliminate the possibility of confidential donations.

Questions about recording in SAMS

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?

Yes, a leftover meal may be served and counted 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 counted twice.

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

Yes, nothing has changed with how meals are to be entered into SAMS at this time. We plan to create detailed instructions so that everyone is recording the same information in the same areas.

When may a referral for nutrition counseling be entered into SAMS to be counted as nutrition counseling?

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.

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

Yes.

If documentation for nutrition education is reported in SAMS, how is education for home delivered meal consumers or adult day care consumers recorded?

Because hdm consumers will not receive a program, but receive written nutrition materials, the education is not recorded in SAMS. HDM consumers are required to receive education two times a year, and a record of this shall be maintained at the AAA.

When ADC consumers receive written nutrition materials, the education is not recorded in SAMS. ADC consumers are required to receive education two times a year, and a record of this shall be maintained at the AAA. If a program is presented in the ADC, this program is recorded through PTH in SAMS.

Questions about utilizing a dietitian

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

Yes. It will be available on the PDA website.

Will each AAA now need to employ a dietitian?

Yes, but only for the hours necessary for the dietitian to provide nutrition monitoring twice a year for each type of meal served. PDA will maintain a list of available dietitians for AAAs who may not have one available in their immediate area.

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

Yes, self-monitoring is seen as a potential conflict of interest and will no longer be allowed. The food service company's dietitian can continue to approve menus and develop education materials. 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 is available on Long Term Living Training Institute (LTLTI) website, <http://www.ltltrainingpa.org> accessible in the Course Catalog/General Non-Associated folder.

Please clarify the need for a dietitian to monitor programs.

A dietitian is required to monitor food, menus, and contract compliance for each type of meal served (congregate, 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.

What costs will be associated with using a dietitian to monitor?

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. The total annual cost would be about \$600.00 plus mileage.

What are the minimum education and experience standards for an approved dietitian?

An approved dietitian is an individual with a bachelor's degree in dietetics who has successfully completed the national examination of the Commission on Dietetic Registration (CDR) and who maintains continuing education requirements as established by the CDR. The Dietitian/Nutritionist shall be licensed in Pennsylvania pursuant to the State Board of Nursing Regulations at 49 PA Code Chapter 21, Professional and Vocation Standard for Licensing Dietitian Nutritionists. A licensed nutritionist with food service background may meet this requirement. AAAs may submit a request for an exception to the Registered Dietitian requirement to utilize the services of a Licensed Dietitian/Nutritionist (LDN).

If a program serves home delivered meals from multiple vendors, as well as congregate meals from multiple vendors, and possibly multiple adult day care meals, does this mean that each of these meals must be monitored twice a year?

Each site that touches food that is funded by PDA shall be monitored. If a program is serving meals from multiple vendors, each type of meal from each vendor shall be monitored. Because the dietitian is responsible for meal monitoring, and not the entire meal service from delivery through clean up, the dietitian may be able to monitor more than one meal during a scheduled monitoring time. For example: a home delivered meal may be available for review earlier in the day than a congregate meal or an adult day care meal, making it possible to schedule multiple meals in a single day.

Questions about Menus

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

The Traditional Menu Plan was designed to allow for increased menu flexibility and decreased cost. This 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 a week in a five day a week program. The cost of a slice of bread is typically \$.11 to \$.16. Other specialized grain products may cost more than this.**
- *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 50% 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.

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

Yes, 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.

Is an email sufficient documentation of menu item substitution?

Yes. The email shall be sent to the AAA representative responsible for this and the AAA representative must approve the substitution.

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

Menus shall be provided to Home Delivered Meal consumers upon consumer request.

Is a selective menu mandatory?

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 a year to allow for reasonable variability.

Do salad portions need to be 1 cup if the portion includes lettuce and other vegetables?

A one cup portion of leafy greens is consider a portion. Salads that are a combination of leafy greens and denser vegetables may be adjusted accordingly. In order to meet the USDA guidelines as published in the My Plate information (<http://www.choosemyplate.gov/food-groups/vegetables-counts.html>), 1 cup of raw or cooked vegetables or vegetable juice, or 2 cups of raw leafy greens can be considered as 1 cup from the Vegetable Group. The chart lists specific amounts that count as 1 cup of vegetables (in some cases equivalents for ½ cup are also shown) towards your recommended intake. This indicates that 1 cup of all raw leafy greens is equivalent to a ½ cup cooked vegetable portion. The addition of other vegetables, like tomatoes or cucumbers, can be part of this 1 cup serving.

Questions about the DETERMINE Your Nutritional Health Assessment Screen

Will the DETERMINE Your Nutrition Health Screen be developed in any other languages other than Spanish?

There are Russian, Creole, and Chinese tools available courtesy of New York State at: <http://www.nyc.gov/html/dfta/html/health/nutritional.shtml>. If another language is needed you may have the document translated.

How will the DETERMINE nutrition risk screen be done?

The DETERMINE questions will be incorporated in the assessment tool that will be used for meals, so there will be very few instances when the paper form will need to be used. The Needs Assessment Tool Express (NAT-E) is now required for home delivered meals consumers (and their spouses if determined eligible to receive a meal). In the congregate setting, only sections 1 and 2 of the NAT-E will need be completed. This assessment will be done annually for both HDM and congregate meal participants and will therefore meet the requirement for the administration of the DETERMINE checklist to be completed annually.

Questions about the Nutrition Advisory Committee

Will the role of the statewide Nutrition Advisory Committee be maintained?

The Nutrition Advisory Committee has played an important role in the nutrition program during the development of the last three Nutrition Services APDs. PDA recognizes the effort put forth by this committee and the positive work they have done. The Nutrition Advisory Committee will continue to serve as an advisory panel to PDA. There will no longer be quarterly meetings, but this committee will be called upon for special projects on an ad hoc basis.