



United States
Department of
Agriculture

Food and
Nutrition
Service

3101 Park
Center Drive
Alexandria, VA
22302-1500

DATE: March 27, 2013

MEMO CODE: SP 31-2013

SUBJECT: Salad Bars in the National School Lunch Program

TO: Regional Directors
Child Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

This memorandum supersedes the January 21, 2011, policy memo SP 02-2011, "Salad Bars in the National School Lunch Program". This revision includes updates based on the revised nutrition standards for school meals and includes questions and answers. This memorandum continues to provide State agencies with information on how salad bars can effectively be used in the service of reimbursable meals and includes information on portion size, point of service, nutrient analysis, and food safety for school meals.

Background

USDA encourages the use of salad bars in the school meal programs. The 2010 Dietary Guidelines for Americans and the Institute of Medicine's (IOM) report, "The School Meals Building Blocks for Healthy Children" encourages the consumption of vegetables and fruits. The IOM report cites a 2007 study that determined that "salad bar programs in public schools indicate positive effects on fruit and vegetable consumption".

Additional data from the School Nutrition Dietary Assessment Study (SNDA) –II, SNDA-III and SNDA-IV describes the benefits of utilizing salad bars in the National School Lunch Program; schools with salad bars offer a wider variety of vegetables and fruits than other schools. Salad bars have the potential to improve nutrition and encourage the consumption of fruits, vegetables and legumes. In addition to the nutritional benefits, salad bars may lower plate waste in school feeding programs. While we recognize the many benefits of salad bars, we are cognizant that salad bars are not always a viable option in some school food service operations. We encourage school food authorities (SFAs) to incorporate salad bars into their school food service operations when possible, and to explore other creative options when salad bars are not an option.

There are many ways that salad bars can be incorporated into the reimbursable meal. Salad bars can feature a special fruit and vegetable theme, a baked potato bar, or a side salad. Salad bars can be set-up in a variety of ways, including pre-portioned and pre-packaged foods to emulate the grab-and-go concept to accommodate a high volume of students in a short period of time.

Portion Size

We have received numerous questions asking to clarify how the menu planner determines the planned portion size. The planned portion size should be an amount that is reasonable for that menu item. For instance, a cup of lettuce would be reasonable, but a cup of radish would be more than a child would normally consume.

When planning a salad bar as *part* of a reimbursable meal, the minimum portion sizes must be consistent with the meal pattern for the age-grade group. For example, when choosing fruits or vegetables from the salad bar to meet the fruit or vegetable component, a menu planner might determine that $\frac{1}{2}$ cup of two or more different fruit or vegetables from the salad bar is the minimum for grades K-5, and grades 6-8, and $\frac{3}{4}$ cup of two or more different fruit or vegetables is the minimum for grades 9-12.

Salad bars can also be used to serve one or multiple food components. It is important to remember that at least $\frac{1}{8}$ cup of fruit or vegetable must be served to count towards the fruit or vegetable component, including those served on the salad bar.

One of the challenges of a salad bar is to ensure that students actually take the minimum required portion size. Pre-portioning food items is one way that can assist staff in quickly identifying portion sizes. If not pre-portioning, then the cashier must determine if the food/menu item can count toward a reimbursable meal. Schools should consider placing signage as a visual aid to help students determine what a minimum portion is for self-service items, particularly in the case of leafy greens.

Point of Service

Salad bars can serve as the complete reimbursable lunch (except for milk) or as a food or menu item that is part of a reimbursable lunch, depending on the food items available and how it is structured. It is critical to consider the location of the salad bar in relation to the Point of Service (POS). To ensure that each student's selections from the salad bar meet the required portions for a reimbursable meal, the POS should be stationed after the salad bar. If a school is not able to position the salad bar in a location prior to the POS, State agencies may authorize alternatives to the POS lunch counts, such as stationing staff at the end of the salad bar, to ensure each student leaves with a reimbursable meal. It is important to note that un-monitored salad bars after the POS are considered extra food that cannot contribute toward the reimbursable meal. It is also important to remember that schools must identify, near or at the beginning of the serving line(s), the food components that constitute the reimbursable school meal(s). Schools have the discretion to determine the best way to present this information, including how to clarify which foods must be selected from the salad bar in order to select a reimbursable meal.

State agencies are encouraged to issue guidance which clearly identifies acceptable POS alternatives and instructions for proper implementation. SFAs may select one of the State agencies approved alternatives without prior approval. In addition, on a

case-by-case basis, State agencies may authorize SFAs to use other alternatives to the POS lunch count. Any such request to use an alternative lunch counting method must be submitted in writing to the State agencies for approval.

Nutrient Analysis

SFAs are not required to conduct a nutrient analysis, however, many SFAs do monitor the nutrients provided in their menus and it can be a helpful tool to determine the nutrient composition of all the foods offered in the salad bar by considering the foods together as a “recipe”. A standardized recipe is a recipe that has been carefully adapted and tested to ensure that it will produce a consistent product every time it is used. Standardized recipes can be helpful when developing recipes for food bars because they promote consistent food quality, predictable yield, control food costs and help with inventory control. Creating a standardized recipe will also simplify the nutrient analysis process. The standardized recipe should be constructed based on a typical day.

To develop a standardized recipe for a salad bar, the menu planner would first determine the planned serving size. Second, the number of servings the recipe produces must be established. Finally, the menu planner must determine the amount of each food ingredient in the recipe by:

- Measuring the amount of each ingredient placed on the food bar on a typical day.
- Measuring the amount of each ingredient left over on the food bar at the end of the meal service; and
- Subtracting the amount left over from the amount placed on the food bar for each ingredient to determine the amount of each ingredient to enter for the recipe.

Food Safety

Schools must implement food safety standards and best practices on all foods served in the meal programs, to minimize the risk of food-borne illness among students. It is important to control contamination from all sources and maintain appropriate food temperatures to ensure food safety. The National Food Service Management Institute’s *Best Practices: Handling Fresh Produce in Schools* fact sheet provides specific food safety recommendations for produce.

The NSF International (formerly the National Sanitation Foundation), (NSF) is an independent, not-for-profit, non-governmental organization that develops standards for foodservice equipment to promote sanitation and protect public health. NSF standards

are recommended, but not required by the Food and Nutrition Service. The NSF standards **do not** preclude salad bars in elementary schools. Instead, the NSF standards provide two possible options when salad bars are provided to elementary school children (grades K-5):

1. All food should be pre-wrapped when used at a self service bar.
2. Students may be served from an open salad bar, with a solid food shield barrier between the students and the food. This option requires a server to portion the choices made by the student and pass the portioned items over the food shield to the student.

Resources

Please refer to the following technical assistance resources referring to salad bars for more information:

- **Nutrient Analysis Protocols: How to Analyze Menus for USDA's School Meals Programs.** <http://www.fns.usda.gov/tn/Resources/nutrientanalysis.html>
- **Reviewer's Guide to SMI Nutrition Reviews and Technical Assistance.** Provides policies, procedures, and guidance for State agency personnel who conduct the nutrition standard reviews.
- **School Lunch Salad Bars – Executive Summary.** <http://www.fns.usda.gov/ora/menu/Published/CNP/FILES/saladbar.pdf>
- **Fruits and Vegetables Galore.** Includes diagrams of salad bar setups and recipes for salads-to-go and salad shakers in the *Tricks of the Trade: Preparing Fruits and Vegetables* booklet. http://teamnnutrition.usda.gov/Resources/fv_galore.html
- **Several Strategies May Lower Plate Waste in School Feeding Programs Report.** <http://www.ers.usda.gov/publications/FoodReview/Sep2002/frvol25i2g.pdf>
- **Best Practices: Handling Fresh Produce in Schools -** The National Food Service Management Institute's fact sheet provides specific food safety recommendations for produce. http://www.fns.usda.gov/fns/safety/pdf/best_practices.pdf

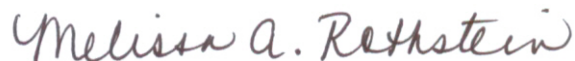
Regional Directors

State Directors

Page 5

- **Fruit and Vegetable Safety-** Food safety resources that provide food safety information specifically for produce.
http://healthymeals.nal.usda.gov/nal_display/index.php?info_center=14&tax_level=2&tax_subject=231&topic_id=1195
- **Let's Move Salad Bars To Schools** - A public health effort to support salad bars in schools. <http://saladbars2schools.org/>

State agencies are reminded to distribute this memo to program operators immediately. SFAs 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.



Melissa A. Rothstein
Acting Director
Child Nutrition Division

Attachment

Q&As: Salad Bars in the National School Lunch Program

1. What resources are available to assist school foodservice directors in implementing salad bars in elementary schools?

USDA encourages the use of fresh fruits and vegetables in school meals. Self service salad bars are one approach that can be successfully included in the meal service when monitored closely to ensure safety. It is critical to review food safety resources and provide training for food service staff and students. Resources that might be particularly useful include:

- *Best Practices: Handling Fresh Produce in Schools*, a USDA and National Food Service Management Institute fact sheet that provides specific food safety recommendations for produce. Available at http://www.fns.usda.gov/fns/safety/pdf/best_practices.pdf
- *Program Information Manual, Retail Food Protection: Recommendations for the Temperature Control of Cut Leafy Greens during Storage and Display in Retail Food Establishments*. Available at: <http://www.fda.gov/Food/FoodSafety/RetailFoodProtection/ucm218750.htm>
- *Program Information Manual: Retail Food Protection Storage and Handling of Tomatoes*. Available at: <http://www.fda.gov/Food/FoodSafety/RetailFoodProtection/IndustryandRegulatoryAssistanceandTrainingResources/ucm113843.htm>
- *Retail Food Safety Program Information Manual: Safe Handling Practices for Melons*. Available at: <http://www.fda.gov/Food/FoodSafety/RetailFoodProtection/ucm217290.htm>
- *Fruits and Vegetables Galore: Helping Kids Eat More*, a USDA publication that contains information on how to train students on salad bar etiquette. Available at: http://teamnutrition.usda.gov/Resources/fv_galore.html

2. Are self-service salad bars allowed in elementary schools?

Yes, self-service salad bars may be used in elementary schools. It is critical to ensure that all schools with salad bars follow their food safety program to ensure safe foods for students. Factors such as layout and space available in the serving area, equipment available to protect the food on the salad bar from contamination, staffing available to monitor the salad bar during meal service, and training for staff and students must be considered in determining how to safely incorporate a salad bar into a school meals program.

The use of food guards or shields is one way to protect food on a salad bar from contamination. NSF International Standard/American National Standard (NSF/ANSI) 2 for Food Equipment provides a standard that establishes the minimum food protection and sanitation requirements for the materials, design, fabrication, construction, and performance of food shields for use in elementary schools.

Because food service codes and regulations vary among local jurisdictions and states, it is important to check with your local or state health department to determine if there are specific guidelines that must be followed in your jurisdiction for the installation and use of salad bars.

3. Are the NSF/ANSI Standards required?

Meeting the NSF/ANSI standards is not a federal requirement. It is important to check with your local health inspector to determine what serving methods are acceptable in order to be in compliance with local or state requirements.

4. Must salad bars be monitored for food safety?

Self service of ready-to-eat foods such as occurs with salad bars can pose a food safety risk that can be reduced by supplying clean utensils and dispensers and by employee monitoring of the salad bar during the meal service to ensure that the utensils and dispensers are properly used. Trained food service staff members should monitor the salad bar, keep all surface areas clean, (e.g., quickly clean up spills), and ensure that students follow good food safety practices (e.g., using tongs and staying above the sneeze guard). Keeping the salad bar clean and safe is essential for students' safety.

It is important to check with your local or state health department to determine the specific guidelines that must be followed in your jurisdiction when monitoring a salad bar. Some jurisdictions adopt the 2009 FDA Food Code and use it as the basis of their state and local food safety regulations. The 2009 FDA Food Code has provisions that address consumer self-service operations such as salad bars. Paragraph 3-306.13 (C) specifically addresses what foods can be offered for consumer self-service, effective dispensing methods, and monitoring by food employees trained in safe operating procedures.

5. What if we can't afford additional labor costs to have food service staff monitor the salad bar?

Keeping a salad bar safe and appealing requires monitoring. If a school is not able to provide food service staff or well-trained volunteers to monitor the salad bar during the meal service, pre-wrapped salad bar components may be an option to improve food safety.

6. What steps can be taken to help students follow good food safety practices when using a salad bar?

It is important to teach students about salad bar etiquette. This includes teaching children proper handwashing techniques and how to control transmission of harmful organisms by using tongs and staying above the sneeze guard. In addition to handwashing, students should be supervised to make sure they use good food handling practices while serving themselves at a salad bar. Reminder signs could be posted on the salad bar to reinforce good food handling practices.

7. Will pre-wrapped salad bar components increase waste?

If schools serve pre-wrapped salad bar components that students like and are packaged in appropriate portions, food waste will be minimized. To reduce packaging waste, reusable or recyclable containers may be used.

8. Will pre-wrapped (Grab 'n Go) options ignore the importance of student choice?

Pre-wrapped (Grab 'n Go) options can be offered in a variety of ways (both portion sizes and product combinations) to provide students choices, i.e. selecting from a variety of pre-wrapped salad bar items.

9. Are meals containing food from the salad bar reimbursable?

Yes, if foods from the salad bar are served in the minimum amounts required and contribute to an eligible reimbursable meal, that meal will be reimbursed.

10. Are schools that offer salad bars required to use specific size serving utensils to meet quantity requirements?

Schools are not required to use specific serving size utensils but may do so to encourage children to take appropriate food amounts. However, regardless of the serving utensils used, food service staff must ensure that the portions on the student's tray meet the meal pattern requirements. This may be done by training the cashiers to visually identify the correct *portions*, or by *pre-portioning the food items*.

11. May a school offer a daily salad bar line that offers multiple vegetable subgroups every day as a way to meet the weekly vegetable subgroup requirement?

Yes, this is acceptable if the salad bar is available to all children each day and offers all of *the required weekly subgroups over the course of the week*.

12. Do the vegetable subgroups offered on a daily salad bar need to be itemized on the production records?

Yes. Section 210.10(a)(3) of the regulations requires that production records and menu records for the meals show how the foods offered to help meet the meal component and quantity requirements. These records must be examined by the State agency during the administrative review to ensure the meals offered are reimbursable.

13. May a school offer an un-monitored salad bar and count the vegetables toward meeting the subgroup requirements, if the student leaves the Point of Service (POS) with a reimbursable meal?

An un-monitored salad bar after the POS is considered extra food that is not part of the reimbursable meal, but counts toward the dietary specifications. The students must select all the components for a reimbursable meal, including vegetable subgroups, from the meal line before the POS. However, salad bars after the POS are acceptable in appropriate circumstances approved by the State agency. In this scenario, for the vegetable subgroups to count, the school has to establish some monitoring mechanism to ensure that students are getting the required components and amounts for a reimbursable meal.

14. What are the approved alternatives to placing salad bars after the point of service/sale?

State agencies are encouraged to issue guidance that clearly identifies acceptable placement of salad bars relative to the point of sale.

15. How does offer versus serve (OVS) work with salad bars?

Schools that offer salad bars must follow the OVS requirement. To ensure that students actually take the minimum required portion sizes from a salad bar, foods may be pre-portioned to allow staff to quickly identify if the student has a reimbursable meal under OVS. If not pre-portioning, then the cashier must be trained to judge accurately the quantities of self-serve items on student trays to determine if the food item can count toward a reimbursable meal.