

Food and Nutrition Service DATE: September 23, 2019

Park Office

MEMO CODE: SP 41-2019

Center SUBJECT:

Salad Bars in the National School Lunch Program and School

Breakfast Program<sup>1</sup>

3101 Park Center Drive Alexandria, VA 22302-1500

TO: Regional Directors

**Child Nutrition Programs** 

All Regions

**State Directors** 

**Child Nutrition Programs** 

All States

This memorandum supersedes policy memo SP 31-2013, "Salad Bars in the National School Lunch Program," dated March 27, 2013. This revision includes policy changes and general updates to outdated resources/website links and updated questions and answers. This memorandum provides State agencies with information on how salad bars can effectively improve the service of reimbursable meals and includes information on portion size, location of the salad bar, production records, and food safety.

### **Background**

USDA encourages the use of salad bars in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) because salad bars are effective at increasing access to and consumption of a variety of fruits and vegetables, as encouraged by the 2015-2020 Dietary Guidelines for Americans.

In addition to the nutritional benefits, salad bars may lower plate waste by allowing students to take only items they will eat. While salad bars offer many benefits, they are not a viable option in some school food service operations. When a salad bar is not an option, we encourage schools to explore other creative options to improve fruit and vegetable consumption.

There are many ways that schools can incorporate salad bars to facilitate service of reimbursable meals. Salad bars can include food options for the complete reimbursable meal (except for milk), or they can include a food or menu item that is part of a reimbursable meal, depending on the food items available and how they are structured. Salad bars can feature a special fruit and vegetable theme, a baked potato bar, or side salads. Salad bars can be set-up in a variety of ways, including pre-portioned and pre-packaged foods to provide a grab-and-go option to accommodate a high volume of students in a short

<sup>&</sup>lt;sup>1</sup> Pursuant to the Congressional Review Act (5 U.S.C. §801 et seq.), the Office of Information and Regulatory Affairs designated this memorandum as not a major rule, as defined by 5 U.S.C. § 804(2).

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time, while practicing safe food handling and reducing the risks associated with foodborne illness.

#### **Portion Size**

When planning a salad bar as part of a reimbursable meal, minimum portion sizes must be consistent with the meal pattern for the age-grade group. For example, when providing fruits or vegetables on a salad bar to meet the fruit or vegetable component, a menu planner operating Offer Versus Serve might determine that ½ cup of a fruit or vegetable, or combination of both, from the salad bar is the minimum students can take. 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 radishes would be more than a child would normally consume.

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 items are not pre-portioned, students should be instructed on how to select the appropriate portion(s). Providing appropriate size serving utensils will assist students in taking the correct serving size. For self-service items, schools are encouraged to place signs as a visual aid to help students determine the minimum portion. It is important to remember each fruit or vegetable serving, including those served on the salad bar, must be at least ½ cup to count towards the fruit or vegetable component.

#### **Point of Sale**

To ensure that each student's selections from the salad bar meet the required portions for a reimbursable meal, the point of sale (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, pre-portioned items should be provided, or students must be instructed on how to select the appropriate portion(s), and appropriately sized serving utensils must be provided. In addition, schools could post visual reminders such as posters to help students determine how to select foods from the salad bar. Schools also could assign student "salad bar ambassadors" to assist younger students in selecting the appropriate size portions from the salad bar. Please note, State agencies *may* choose to require approval of alternate POS for salad bars.

#### **Production and Menu Records**

SFAs are required to use production and menu records. This requirement can be particularly helpful for salad bars. Production and menu records demonstrate how the meals offered contribute to the required food components and food quantities for each age/grade group every day. These records can be helpful when developing salad bars because they promote consistent food quality and predictable yields, control food costs, and help with inventory control. The record should be constructed based on a typical day.

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

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

### **Food Safety**

To minimize the risk of food-borne illnesses, schools participating in the NSLP and SBP must follow all State and local food safety rules and regulations. It is important to control potential food safety hazards and maintain appropriate food temperatures to prevent the growth of pathogenic microorganisms. The Institute of Child Nutrition's *Best Practices: Handling Fresh Produce in Schools* fact sheet provides specific food safety recommendations for produce (https://www.fns.usda.gov/best-practices-handling-fresh-produce-schools).

NSF International (NSF) is an independent, not-for-profit, non-governmental organization that develops standards for food service equipment to promote sanitation and protect public health. Following NSF food equipment standards is recommended but not required. In elementary schools (grades K-5), the NSF standards recommend all food be pre-wrapped when used at a self-service salad bar. It is important for SFAs to check with their State agency and/or local health department to determine what serving methods are acceptable in order to comply with State and local requirements.

State agencies are reminded to distribute this memorandum to Program operators. Program operators should direct any questions concerning this guidance to their State agency. State agencies with questions should contact the appropriate FNS Regional Office.

Angela Kline

Director

Policy and Program Development Division

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Attachment

# Salad Bars in the National School Lunch Program and School Breakfast Program Ouestions and Answers

### 1. 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 can be reimbursed.

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

Yes, elementary schools may offer self-service salad bars. However, when younger children are provided self-service access to salad bars it is especially important that they are instructed on how to take the required minimum portion for a reimbursable meal and to ensure that food safety is maintained.

Because food service codes and regulations vary among States and local jurisdictions, it is important to check with the State or local health department to determine if there are restrictions in the use of salad bars for younger children.

### 3. 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.

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

Yes. The regulations require that production records and menu records for the meals show how the foods offered help meet the meal component and quantity requirements (7 CFR 210.10(a)(3)). The State agency must examine these records during the administrative review to ensure the meals offered are reimbursable and that all of the required vegetable subgroups are offered over the course of the week.

### 5. May a salad bar with fruits and vegetables offered as part of the reimbursable meal be located after the Point of Sale (POS)?

Yes. If a school is not able to position the salad bar in a location prior to the POS, the salad bar may be positioned after the POS. When the salad bar is after the POS, the SFA must ensure that students are trained on how to select the required meal components and portion(s). Correct food service utensils must be used to facilitate students selecting the required quantities. State agency approval may be required to locate the salad bar after the POS.

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

Generally, schools are not required to use specific serving size utensils but may do so to encourage children to take appropriate food amounts. However, schools must use specific size serving utensils when the salad bar is located after the POS to ensure students take the appropriate serving sizes.

### 7. How can schools ensure salad bars provide age-appropriate portions?

Menu planners can pre-determine foods offered and serving sizes on salad bars, as with all serving lines. Pre-portioning food items and providing training and appropriate serving utensils are two ways to ensure students select the required meal components and quantities. Schools might also instruct students on building a healthy salad bar meal.

### 8. How can schools ensure good food safety practices are followed when using a salad bar?

It is critical that schools follow their food safety program to ensure food is safe for all students. Schools should consider factors such as layout and space available in the serving area, food packaging to protect the food on the salad bar; staffing, if available, to monitor the salad bar during meal service; and training for staff and students in determining how to safely incorporate a salad bar into School Meal Programs.

It also is important to teach students about salad bar etiquette, including proper handwashing techniques and use of tongs or other utensils to control transmission of pathogens. In addition to handwashing, schools should monitor self-service salad bars to make sure students use good food handling practices and prevent students from introducing foreign substances into the salad bar. Schools can post signs on the salad bar to reinforce good food handling practices.

### 9. Must schools monitor salad bars for food safety?

Schools must check with their State and/or local health department to determine the specific local guidelines for monitoring salad bars. Some jurisdictions adopt the Food and Drug Administration's (FDA) Food Code and use it as the basis of their State and local food safety regulations. The FDA Food Code has provisions that address consumer self-service operations, such as salad bars. Section 3-306.13 specifically addresses what foods may be offered for consumer self-service, effective dispensing methods, and monitoring by food service employees trained in safe operating procedures.

Schools should monitor salad bars during meals service. Self-service of ready-to-eat foods can pose a food safety risk of unintentional contamination by consumers. This risk 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 used properly. 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.

### 10. Will pre-wrapped salad bar components increase food waste?

Serving pre-wrapped salad bar components that students like and that are packaged in appropriate portions is a simple strategy for minimizing food waste. Reusable or recyclable containers may be used to reduce packaging waste.

### 11. Will pre-wrapped (Grab 'n Go) options interfere with student choice?

Pre-wrapped (Grab 'n Go) options, which offer variety in portion sizes and product combinations, allow food service operators to provide students with choices, such as when selecting from a variety of pre-wrapped salad bar items.

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

Schools must ensure students 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 food is not pre-portioned, the cashier must be trained to accurately judge the quantities of self-serve items on student trays to determine if the food item can count toward a reimbursable meal. If salad bars are located after the POS, the SFA must ensure that students are trained on how to select the required meal components and portion(s), and correct food service utensils must be used to facilitate students selecting the required quantities.

#### 13. How would a school conduct a nutrient analysis on a salad bar?

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 salad 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 salad bar on a typical day;

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

## 14. What resources are available to assist school food service directors with 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 Institute of Child Nutrition fact sheet that provides specific food safety recommendations for produce. Available at https://www.fns.usda.gov/best-practices-handling-fresh-produce-schools.
- 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: https://www.fns.usda.gov/tn/fruits-vegetables-galore-helping-kids-eat-more
- Fruit and Vegetable Safety: Food safety resources that provide food safety information specifically for produce. https://www.fns.usda.gov/food-safety/produce-safety-resources.
- Offer Versus Serve Guidance for the National School Lunch and the School Breakfast Program. https://www.fns.usda.gov/sites/default/files/cn/SP41-2015av2.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:
  - https://www.fda.gov/food/guidanceregulation/retailfoodprotection/industryandregulatoryassistanceandtrainingresources/ucm218750.htm.
- *Program Information Manual:* Retail Food Protection Storage and Handling of Tomatoes. Available at:
  - https://www.fda.gov/food/guidanceregulation/retailfoodprotection/industryandregulatoryassistanceandtrainingresources/ucm113843.htm.
- The Food and Drug Administration (FDA) Draft Guidance for Industry: Guide to Minimize Microbial Food Safety Hazards of Fresh-cut Fruits and Vegetables. Available at: https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-guide-minimize-microbial-food-safety-hazards-fresh-cut-fruits-and-vegetables.
- The FDA Food Code <u>Section 3-306.13</u>: https://www.fda.gov/media/110822/download
- Handling Fresh Produce on Salad Bars: https://theicn.org/resources/179/produce-safety/105755/handling-fresh-produce-on-salad-bars-fact-sheet.pdf

- Promoting and Supporting School Salad Bars: An Action Guide for State Health Practitioners. Available at: https://www.cdc.gov/nccdphp/dnpao/state-local-programs/pdf/promoting\_supporting\_school\_saladbars.pdf.pdf
- NSF International: <a href="https://www.nsf.org">https://www.nsf.org</a>