



# **FY 2010 Office of Head Start Monitoring Protocol**

*September 10, 2009*

## **Nutrition Services Protocol**



## Nutrition Services

This section of the Protocol contains a list of **Compliance Questions** that identify Head Start (HS) program requirements against which each question is designed to monitor compliance. Reviewers assigned to this section must answer all of the Compliance Questions, but only after collecting and analyzing sufficient information to make well-informed decisions. Responses to each Compliance Questions must be substantiated with details from extensive interviews, document reviews, and/or observations.

**Targeted Questions** following the Compliance Questions will help lead reviewers to the right people, documents, and observations from which to gather information. These questions reflect the minimum evidence gathering requirements to address the Compliance Questions. Responses to Compliance Questions are not limited to the interviews, document reviews, and observations outlined in the Protocol's Targeted Questions, so long as additional sources are necessary to answer the Compliance Question. The onsite review should cover all program options provided by the grantee and delegate as well as childcare partnerships and family child care homes.

For each Compliance Question, reviewers must document and describe detailed evidence collected through the Guides and Checklists. Guides are organized by type of interviewee, type of document to be reviewed, type of observation to be conducted or system to be analyzed. For example, when interviewing a parent, all Targeted Questions for parents, regardless of where they reside in the protocol, will be listed on the Parent Interview Guide, organized by key topic area (e.g., Communication with Families). The Guides are the area where reviewers will document all of their Notes, which form the foundation for understanding grantee compliance, and, when appropriate, become the basis for preliminary areas of noncompliance. For all evidence collected, reviewers should provide sufficient context to support the conclusions drawn, including the number of documents reviewed, people interviewed, and observations made. In the Monitoring Software, all Notes collected through the Guides are attached to the standards listed with each Targeted or Compliance Question.

The Nutrition Services section of the Protocol is divided into five subsections:

- Staff Qualifications – Nutrition
- Understanding Children's Nutritional Needs
- Managing Nutritional Services
- Integrating Nutrition into Early Childhood Development
- Management Systems Analysis



**Nutrition Services Question 1A**

Has the program hired staff or consultants as content area experts to oversee nutrition services who are registered dietitians or nutritionists?

1304.52(d)(3)

**Targeted Question for Nutrition Services Question 1A**

Interview: Nutrition Coordinator (Staff Qualifications and Expertise)

- Describe your training or experience related to diet and nutrition. If you are not the content area expert, describe the training or experience of the person who provides this expertise for the program.
- Describe how you provide the program with regularly scheduled, ongoing expertise and oversight in the area of nutrition services. If you are not the content area expert, does someone support you in this area and how?

Staff Files: Nutrition Content Area Expert (Staff Qualifications and Expertise)

- List the nutrition content area expert's training, experience, and qualifications.



**Nutrition Services Question 2A**

Does the program's nutrition program include a variety of foods and meet each child's nutritional needs and feeding requirements, including children with disabilities and children with special medical or dietary needs?

1304.23(b)(1)

**Targeted Question for Nutrition Services Question 2A**

Child Files

- Does the child have special dietary needs?  
Has the program made the required accommodations to meet these needs?

Interview: Nutrition Coordinator (Special Dietary and Nutritional Needs)

- How do you inform teaching and cooking staff that a child has a disability, food allergy, medically based dietary need, or other special dietary need that requires accommodation?

Interview: Kitchen Staff and Nutrition Coordinator (Special Dietary and Nutritional Needs)

- How do you know when you need to modify a menu for a child with disabilities, food allergies, or other medically based or special dietary needs? How do you take nutritional assessment data into consideration? How do you accommodate special medical or dietary needs?



**Nutrition Services Question 2B**

APPLIES ONLY TO: Center-based and family child care programs serving preschool-age children

Do preschool-age children in center-based settings receive the quantities and kinds of foods that conform to recommended serving sizes and minimum standards for meal patterns recommended in the USDA meal pattern or nutrient standard menu planning requirements, including special attention to ensuring that foods served are high in nutrients and low in fat, sugar, and salt?

*Note: Refer to 7 CFR Parts 210, 220 (School Meal Initiatives for Healthy Children) and 226 (CACFP) for specific meal pattern and menu planning requirements.*

1304.23(b)(1)(v),  
1304.23(b)(1)(vi),  
1304.23(b)(1)(ii)

**Targeted Question for Nutrition Services Question 2B**

Interview: Nutrition Coordinator (Appropriate Foods)

- For part-day center-based programs, how do you ensure that each child receives meals and snacks that provide at least one-third of the child's daily nutritional needs?  
1304.23(b)(1)(ii)
- For full-day center-based programs, how do you ensure that each child receives meals that provide one-half to two-thirds (depending on the length of the program day) of the child's daily nutritional needs?  
1304.23(b)(1)(ii)

Document Review: Menus

- Review menus and describe in your notes whether menu planning complies with USDA requirements. Your notes should describe how the menus comply or do not comply with USDA requirements, noting how you know the nutritional content of the foods offered. If foods are high in fat, sugar, or salt, describe how you know their nutritional content.



**Nutrition Services Question 2C**

APPLIES ONLY TO: Center-based or family child care programs

Are children in morning center-based settings served a nutritious breakfast if they have not received breakfast by the time they arrive at the Early Head Start (EHS) or Head Start (HS) program?

*Note: A nutritious breakfast should be served to all center-based children, regardless of arrival time.*

1304.23(b)(1)(iii)

**Targeted Question for Nutrition Services Question 2C**

Interview: Parent (Nutrition)

- Does your child receive breakfast every morning, even if he or she arrives late?  
*Asked by: ISR I*

Interview: Teacher and Family Child Care Provider (Meals and Nutrition)

- Do children receive breakfast every morning? What happens when children arrive after breakfast is served?  
*Asked by: ECD*



<b>Nutrition Services Question 2D</b>	
APPLIES ONLY TO: Programs serving infants and toddlers	
Do program staff communicate regularly with parents to ensure that children's nutritional needs are met?	
	1304.23(a)(3)

**Targeted Question for Nutrition Services Question 2D**

Child Files

- Review parent contact logs or daily child notes, if available. Is there documentation that staff communicate regularly with parents about their child's nutritional needs?

Interview: Parent (Nutrition)

- How does the program communicate with you about your child's daily experiences with food?  
*Asked by: ISR I*

Interview: Teacher and Family Child Care Provider (Meals and Nutrition)

- How often do you communicate with parents about:
  - Frequency and manner of feeding;
  - Introduction of solid foods and other new foods;
  - Daily elimination patterns of each child;
  - Food intolerances and preferences of each child; and
  - Quantity and consumption of foods at home and school?*Asked by: ECD*



**Nutrition Services Question 2E**

APPLIES ONLY TO: Center-based or family child care programs serving infants and toddlers

Do infants and toddlers in center-based settings receive food appropriate to their nutritional needs, developmental readiness, and feeding skills, as recommended in the USDA meal pattern or nutrient standard menu planning requirements?

*Note: Refer to 7 CFR Parts 210, 220 (School Meal Initiatives for Healthy Children), and 226 (Child and Adult Care Food Program [CACFP]) for specific meal pattern and menu planning requirements.*

1304.23(b)(1)(iv)

**Targeted Question for Nutrition Services Question 2E**

Interview: Nutrition Coordinator (Appropriate Foods)

- How do you ensure that foods posing health risks are not offered to children younger than 1 year old?
- How do you ensure that foods posing a high risk of choking for infants and toddlers (e.g., hot dogs, whole grapes, hard raw vegetables, popcorn, whole nuts) are not given to them?

Document Review: Menus

- Review menus, diet intake records, or feeding records to confirm that foods posing health or choking risks are not included. Your notes should describe how the menus comply or do not comply with USDA requirements.



**Nutrition Services Question 2F**

Do program staff and families work together to identify each child's nutritional needs, including dietary requirements for children with disabilities, children with nutrition-related health problems, and infants and toddlers?

1304.23(a)(2)

**Targeted Question for Nutrition Services Question 2F**

Interview: Health Coordinator (Nutritional Needs)

- When and how often do you discuss children's nutritional needs with families? Can you provide documentation of activities such as meetings and gatherings, communications, interactions, agendas with sign-in sheets, or similar documentation that demonstrates how communication with families occurs?

Interview: Nutrition Coordinator (Special Dietary and Nutritional Needs)

- Do you discuss with families their cultural, religious, ethnic, or personal food preferences for their children? Do you discuss nutrition-related health problems that require special dietary considerations, such as obesity, iron deficiency, failure-to-thrive, food allergies and intolerances, milk allergies, and lactose intolerance?

Interview: Parent (Nutrition)

- When and how often do program staff discuss your children's nutritional needs and health with you?

HEA3C

Asked by: ISR I



<b>Nutrition Services Question 3A</b>	
APPLIES ONLY TO: Home-based programs	
Do home-based programs provide appropriate snacks and meals to each child during group socialization activities?	
	1304.23(b)(2)

**Targeted Question for Nutrition Services Question 3A**

Interview: Nutrition Coordinator (Appropriate Foods)

- How do you ensure that appropriate snacks and meals (e.g., formula, baby food) are provided to infants and toddlers during socialization?  
*Applies to: Home-based programs serving infants and toddlers*

Interview: Parent (Nutrition)

- Can you describe how you have been involved in planning snacks and meals for group socializations?  
*Asked by: ISR I*

Interview: Home Visitor (Nutrition)

- How do you learn about a child's nutritional needs that require accommodation, including a disability, food allergy, medically based need, or other special dietary need?  
*Asked by: ECD*
- How do you work with parents to plan and implement nutrition activities for group socializations?  
*Asked by: ECD*



<b>Nutrition Services Question 4A</b>	
APPLIES ONLY TO: Center-based or family child care programs	
Is effective dental hygiene promoted among children in conjunction with meals?	
	1304.23(b)(3)

**Targeted Question for Nutrition Services Question 4A**

Interview: Teacher and Family Child Care Provider (Dental Hygiene)

- How often and when do children over age 1 year brush their teeth in school?  
(Note to reviewer: Once daily, after a meal, Head Start staff or volunteers should help children age 1 year or older brush their teeth using fluoride toothpaste.)  
*Asked by: ECD*
- How often and when do staff wipe the gums of infants' under age 1 year during the program day?  
(Note to reviewer: At least once during the program day, Head Start staff or volunteers must wash their hands then cover a finger with a gauze pad or soft cloth and gently wipe infants' gums.)  
*Applies to: Programs serving infants and toddlers*  
*Asked by: ECD*

Observation: Health and Safety Center-based Observations and Health and Safety Family Child Care Observations (Dental Hygiene)

- Describe toothbrushing and gum-wiping activities and when they occur.



**Nutrition Services Question 4B**

APPLIES ONLY TO: Center-based or family child care programs

Do nutrition services contribute to children's development and socialization by providing sufficient time for each child to eat? Does the program ensure that food is not used as punishment or reward? Is each child encouraged, but not forced, to eat or taste food?

1304.23(c)(2), 1304.23(c)(3)

**Targeted Question for Nutrition Services Question 4B**

Interview: Teacher and Family Child Care Provider (Meals and Nutrition)

- What steps do you take to ensure that children have adequate time to eat, and that slower eaters are given enough time to finish their food?  
1304.23(c)(3)  
*Asked by: ECD*
- How do you encourage children to try new foods? Do children have to eat all of the foods offered? Are there times when children are not allowed to have something that is offered or are given something extra based on how they behave? Note that standards of conduct indicate that food should not be used as reward or punishment for children.  
PDM7H, 1304.52(i)(1)(iv)  
*Asked by: ECD*

Observation: Health and Safety Center-based Observations and Health and Safety Family Child Care Observations (Meals)

- How are children encouraged to try new foods? Do children have to eat all of the foods offered? Are there times when children are not allowed to have something that is offered or are given something extra because of behavior? Note that standards of conduct indicate that food should not be used as reward or punishment for children.  
PDM7H, 1304.52(i)(1)(iv)
- During meal service do children have adequate time to eat? Are slower eaters given enough time to finish their food?  
1304.23(c)(3)



**Nutrition Services Question 4C**

APPLIES ONLY TO: Center-based or family child care programs

Do nutrition services contribute to children's development and socialization by ensuring that all toddlers, preschool children, and assigned classroom staff, including volunteers, eat together family-style, and share the same menu to the extent possible?

1304.23(c)(4)

**Targeted Question for Nutrition Services Question 4C**

Observation: Health and Safety Center-based Observations and Health and Safety Family Child Care Observations (Meals)

- Describe how staff implement family-style meals. For example:
  - Is conversation shared during the meal?
  - If the program serves prepackaged food, are teachers still sitting with the children during meals and snacks?
  - Do other designated staff or volunteers eat and converse with the children during meals if teachers are unable to have their meals at the same time as children?
  - Do teachers use mealtime as an opportunity to model language, conversation, and social interaction and to introduce nutritious foods?



**Nutrition Services Question 4D**

APPLIES ONLY TO: Center-based or family child care programs serving infants and toddlers

Do nutrition services contribute to children's development and socialization by ensuring that infants are held while being fed rather than being laid down to sleep with a bottle?

1304.23(c)(5)

**Targeted Question for Nutrition Services Question 4D**

Observation: Safe Environments Center-based Checklist and Safe Environments Family Child Care Checklist (Health and Safety of Infants and Toddlers)

- Are infants held during bottle feeding? If not, describe.

ECD3H, 1304.23(c)(5)



**Nutrition Services: Management Systems Analysis**

This section lists a series of targeted questions not linked to a performance standard at the service area level. These questions are designed to contribute to a comprehensive analysis of the program’s management systems. Accordingly, these questions appear in each protocol section and are completed for each service area to provide insight into how key management systems function with relationship to each service area.

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**Targeted Question for Nutrition Services: Management Systems Analysis**

*Interview: Nutrition Coordinator (Ongoing Monitoring and Oversight)*

- How do you monitor delivery of the program's nutrition services and the program's compliance with all Federal regulations?
- Show me the documents, systems, and reports used in implementing the ongoing monitoring of nutrition services.
- What do you do if you detect problems or weaknesses with the program's nutrition services?

*Interview: Nutrition Coordinator (Program Planning)*

- Describe how information from the annual self assessment is incorporated into your program planning and implementation.
- Describe how information from the community assessment (and its updates) is incorporated into your program planning and implementation.

*Summary Analysis: Overall Service Summary*

- Summarize your general impressions of the program’s delivery of nutrition services. The summary should describe what the program does well, which areas need improvement, and your overall level of confidence in the program’s provision of nutrition services. Your summary should not directly reiterate the strengths and findings you identified through implementation of the protocol but, rather, should reflect your overall analysis and impressions of the program’s effectiveness in providing nutrition services.

*Summary Analysis: Communication among Staff*

- Summarize whether the program has effective two-way communication between Nutrition staff and staff in other service areas. Your summary should provide examples of why you consider the communication between the program’s staff to be effective or ineffective. Your summary might reflect a potential program strength, a concern, or general compliance.

*Summary Analysis: Communication with Parents*

- Summarize whether the program has effective two-way communication between Nutrition staff and parents. Your summary should provide examples of why you consider the communication between the program’s staff and parents to be effective or ineffective. Your summary might reflect a potential program strength, a concern, or general compliance.



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### Summary Analysis: Ongoing Monitoring

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- Summarize the program's process for ongoing monitoring of Nutrition services. A comprehensive explanation of this system should include a description of each of the following:
  - Monitoring measures, tools or instruments, materials and procedures
  - Staff responsibilities for ongoing monitoring of their respective service areas
  - How the program analyzes and documents progress toward achieving program goals and complying with performance requirements
  - How follow up occurs for findings or problems identified through data collection, and how these findings are corrected and documented.

This summary should help all team members understand the effectiveness or ineffectiveness of Nutrition services. Your summary might reflect a potential program strength, a concern, or general compliance.

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### Summary Analysis: Planning

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- Review the Nutrition Services area's written plans so you understand the goals the program intends to achieve and the strategies the program plans to use to accomplish its goals. Summarize the program's progress in implementing its plans and achieving its defined goals. Your summary might reflect a potential program strength, a concern, or general compliance.

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### Summary Analysis: Record-Keeping

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- Summarize whether the program is effective in keeping up to date and accurate Nutrition records. Your summary should provide examples of why you consider the program's record-keeping system to be effective or ineffective. Your summary might reflect a potential program strength, a concern, or general compliance.

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### Summary Analysis: Service Specific Strengths

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- Summarize program strengths noted in nutrition services. Describe any practices that were found to be new or innovative and had a positive impact that helped the grantee overcome challenges and provided greater/improved service quality or surpassed established performance indicators. Some examples of broad categories of program strengths include (but are not limited to):
  - Collaborations with local/community-based services
  - Exemplary fiscal practices to ensure the safeguarding of Federal dollars
  - Highly successful efforts to address and improve school readiness
  - Expansion of the program and increased accessibility
  - Extraordinary accommodations for children/families (e.g., children with disabilities)
  - Innovative program design and management

Do not include strengths that will contradict any PANCs identified on this review.