

## Attachment N.7. Nutrient Analysis and Validation Checklist

This information is being collected from State agencies, school food authorities, schools. This is a revision of a currently approved information collection. The Richard B. Russell National School Lunch Act (NSLA) 42 U.S.C. § 1758, as amended, authorizes the National School Lunch Program (NSLP). This information is required to administer and operate this program in accordance with the NSLA. Under the Privacy Act of 1974, any personally identifying information obtained will be kept private to the extent of the law. According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0584-0006. The time required to complete this information collection is estimated to average 47.5 hours of reporting burden per response. The burden consists of the time it takes for the State agency to conduct the off-site portion of the review which includes scheduling of the review and the completion of the Off-site Assessment, Resource Management Risk Indicator, and Site Selection Tools. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Policy Support, 3101 Park Center Drive, Room 1014, Alexandria, VA 22302, ATTN: PRA (0584-0006). Do not return the completed form to this address.

### Nutrient Analysis & Validation Checklist

**Completion of this checklist is only required when conducting or validating a nutrient analysis.**

|             |  |
|-------------|--|
| SFA/School: |  |
|-------------|--|

|  | YES                      | NO                       | COMMENTS                        |
|--|--------------------------|--------------------------|---------------------------------|
| 1) Is the targeted menu review site in compliance with the meal pattern requirements (meal components and quantities)? <ul style="list-style-type: none"> <li>• If YES, proceed with conducting/validating nutrient analysis.</li> </ul>   | <input type="checkbox"/> | <input type="checkbox"/> |                                 |
| 2) If required, has the SFA/school implemented corrective action as agreed to during the on-site review to ensure the appropriate source documents are accurate before starting the nutrient analysis process? <ul style="list-style-type: none"> <li>• If YES, proceed with conducting a nutrient analysis.</li> <li>• If NO, immediate corrective action is required. Establish a time frame for the school to locate or develop the necessary documentation for the reviewer to perform an accurate nutrient analysis. Conduct analysis once documentation is received.</li> <li>• If documentation is not received by the established date, proceed with noncompliance actions (i.e., withholding funds).</li> </ul> | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br><input type="checkbox"/> |
| <b>Source Documents Required For Analysis/Validation</b>   | <b>YES</b>               | <b>NO</b>                | <b>COMMENTS</b>                 |
| Review all documentation the SFA provided in support of menus for the menu/nutrient analysis evaluation. Indicate whether the school/SFA provided the following documentation/materials needed to complete/validate the nutrient analysis. Request additional information, if needed.  |                          |                          |                                 |
| Are the necessary materials available?   | <input type="checkbox"/> | <input type="checkbox"/> |                                 |
| a. Menus <ul style="list-style-type: none"> <li>• The reviewer should conduct a weighted nutrient analysis based on meals offered for each USDA established age/grade group and menu type offered at lunch and breakfast.</li> </ul>   | <input type="checkbox"/> | <input type="checkbox"/> |                                 |
| b. Production records include all required information for each age/grade group and menu type <ul style="list-style-type: none"> <li>• Production records (including salad bar/theme bar production records) must list all food or menu items offered as part of the reimbursable meal. Additional items such as condiments, gelatin, butter, must also be included. Portion sizes, total food quantity used to</li> </ul>   | <input type="checkbox"/> | <input type="checkbox"/> |                                 |

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|  | YES                      | NO                       | COMMENTS |
|--|--------------------------|--------------------------|----------|
| prepare each menu item or food item, and leftovers must be recorded.   |                          |                          |          |
| <p>c. Number of a la carte sales, adult, and “other” meals differentiated on production records</p> <ul style="list-style-type: none"> <li>If the same food items are used for reimbursable meals, a la carte sales and/or “other” meals (e.g., adult meals, meals for special diets), production records differentiate the number of menu items planned for each type of meal, or for a la carte sales.</li> </ul>              | <input type="checkbox"/> | <input type="checkbox"/> |          |
| d. Standardized recipes include preparation instructions, portion sizes and yield used in the menus for the period of evaluation.  | <input type="checkbox"/> | <input type="checkbox"/> |          |
| e. Nutrition information is available for commercially prepared foods (e.g., Nutrition Facts Labels or Manufacturer’s Data Submission Forms).  | <input type="checkbox"/> | <input type="checkbox"/> |          |
| f. Food product descriptions/specifications indicate the specific form of the foods used (e.g., canned in light syrup, frozen, no added salt, 1 % lowfat milk).  | <input type="checkbox"/> | <input type="checkbox"/> |          |
| <p>g. Crediting Information is available.</p> <ul style="list-style-type: none"> <li>CN labels are useful because they give information on creditable food items for identifying a food-based reimbursable meal and help to identify specific commercially prepared foods in the CN Database. However, Child Nutrition labels do not provide nutrient information for data input when conducting a nutrient analysis.</li> </ul> | <input type="checkbox"/> | <input type="checkbox"/> |          |
| <b>PROCEED BELOW ONLY IF VALIDATING AN EXISTING NUTRIENT ANALYSIS</b>  |                          |                          |          |
| VALIDATING NUTRIENT ANALYSIS CHECKLIST   | YES                      | NO                       | COMMENTS |
| <p>1) Was the nutrient analysis software:</p> <p>a) USDA approved?</p> <ul style="list-style-type: none"> <li>If SFA is not using USDA-approved software to conduct their nutrient analysis, the SA must conduct a nutrient analysis.</li> </ul>   | <input type="checkbox"/> | <input type="checkbox"/> |          |
| <p>b) Using most recent version of CN database?</p> <ul style="list-style-type: none"> <li>It is important for schools to update their software in order to ensure they are using the updated CN Database, as it will ensure a more accurate nutrient analysis. Software companies may issue newer</li> </ul>  | <input type="checkbox"/> | <input type="checkbox"/> |          |

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|  | YES                      | NO                       | COMMENTS |
|--|--------------------------|--------------------------|----------|
| <p>versions of their software to update computer functions that are not related to the CN Database. The version of the software and CN Database release is generally located under the "Help" pull-down menu. If not, the SFA may need to contact the software company to determine the version they are currently using.</p>  |                          |                          |          |
| <p>2) What credentials, qualifications, and/or training, does menu planner have?</p> <ul style="list-style-type: none"> <li>• Record the qualifications of the computer specialist who will enter data. List any credentials, training, and/or related experience.</li> </ul>  | <input type="checkbox"/> | <input type="checkbox"/> |          |
| <p>3) Are source documents missing that prevent the reviewer from validating the analysis?</p>   | <input type="checkbox"/> | <input type="checkbox"/> |          |
| <p>4) Were the appropriate Age/Grade groups used?</p> <ul style="list-style-type: none"> <li>• Determine if the age/grade groups used are appropriate. Review the nutrient analysis printout to determine if the age/grade groups entered are appropriate to the age/grade groups used for menu planning and portioning.</li> </ul>  | <input type="checkbox"/> | <input type="checkbox"/> |          |
| <p>5) Was a separate analysis completed for breakfast and lunch, each age/grade group, and each menu type?</p> <ul style="list-style-type: none"> <li>• Determine if separate analyses were completed for breakfast and lunch.</li> <li>• A separate nutrient analysis is required for each age/grade group. Also, if a school has different menu offerings for different segments of students in the school, separate analyses are required for each population segment.</li> </ul>   | <input type="checkbox"/> | <input type="checkbox"/> |          |
| <p>6) Validating weighted averaging:<br/>Interview the menu planner to determine the method used to calculate the number of offered menu items. Does the method described yield a correct weighted nutrient analysis?</p> <ul style="list-style-type: none"> <li>• If the answer is "No", reviewer must provide the necessary TA and request immediate corrective action.</li> <li>• If the answer is "Yes" meaning that the method used seems reasonable, validate the weighted nutrient analysis: <ul style="list-style-type: none"> <li>a. Was the weighting done correctly? <ul style="list-style-type: none"> <li>○ If the weighted averaging was done for the individual school, determine if it was done correctly. Was the weighting of individual menu</li> </ul> </li> </ul> </li> </ul> | <input type="checkbox"/> | <input type="checkbox"/> |          |
|  | <input type="checkbox"/> | <input type="checkbox"/> |          |

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|  | YES                      | NO                       | COMMENTS |
|--|--------------------------|--------------------------|----------|
| <p>or food items based on information from past production records at the school?</p> <p style="padding-left: 40px;">b. Were a la carte sales, adult meals, and special needs meals excluded from the analysis?</p>  | <input type="checkbox"/> | <input type="checkbox"/> |          |
| <p>7) Were all menu and food items, condiments, and foods of minimal nutritional value served as part of a menu item, included in the nutrient analysis?</p> <ul style="list-style-type: none"> <li>• Determine if the school included all offered menu and food items, condiments, and foods of minimal nutritional value (served as part of a menu item) in the nutrient analysis.</li> <li>• Condiments or any other food item located after the point of service must be included in the analysis if they are part of a menu item or associated with a reimbursable meal. For example, if a packet of catsup (9 grams) is made available for hamburgers, the menu should include the projected number of packets historically served. If condiments are available in bulk, the total amount usually used for a meal should be recorded.</li> </ul> | <input type="checkbox"/> | <input type="checkbox"/> |          |
| <p>8) Were recipes entered using the "Yield Factor Method"?</p> <ul style="list-style-type: none"> <li>• Determine if recipes and ingredients were entered into the database using the Yield Factor Method."</li> <li>• Refer to guidance manual <i>Nutrient Analysis Protocols for the School Meals Nutrition Program: How to Analyze Menus for USDA's School Meal Programs</i> for information on using the yield factor method.</li> <li>• The Yield Factor Method requires that each raw ingredient in a recipe be converted and entered into the recipe database as ready-to-serve or cooked.</li> </ul>  | <input type="checkbox"/> | <input type="checkbox"/> |          |
| <p>9) Did the SFA/school reanalyze menus based on changes in student selections and participation?</p> <ul style="list-style-type: none"> <li>• Review the production records for a minimum of one day during the review week and compare to a day(s) in a previous menu cycle. Determine if the school/SFA is adjusting the number of menu items offered according to student preference.</li> </ul>  | <input type="checkbox"/> | <input type="checkbox"/> |          |
| <p>10) Are menus being reanalyzed based on changes in purchased products?</p> <ul style="list-style-type: none"> <li>• Review a sample of purchased products to verify that changes are made to the ingredient and/or recipe database when new products are purchased.</li> </ul>  | <input type="checkbox"/> | <input type="checkbox"/> |          |

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|   | YES  | NO   | COMMENTS |
|---|--|--|----------|
| <p>11) Did the SFA/school input nutrient data correctly for:</p> <ul style="list-style-type: none"><li>a. Local or USDA modified recipes?</li><li>b. Food items not in the database?</li></ul> <ul style="list-style-type: none"><li>• Through interview and/or review of the local database, determine if the school/SFA input nutrient data correctly.</li><li>• Obtain a sample of the standardized recipes that the school/SFA entered into the database and determine that each recipe has been accurately entered into the database, using the "Yield Factor Method."</li><li>• Compare the data entered to the nutrition facts label for the product or information submitted by the product manufacturer.</li><li>• Evaluate the detailed summary for % values that appear too high or too low for specific menu items or nutrient averages. This is an indication that either the ingredient or the recipe was entered incorrectly.<ul style="list-style-type: none"><li>○ If data were not entered correctly, determine if the problem is systemic or non-systemic.</li><li>○ Ingredients and recipes need to be entered accurately in order to generate a reliable nutrient analysis. Frequent data entry errors (e.g., recipes that are missing ingredients, incorrect yields, incorrect nutrients entered for products, incorrect portion size assigned to nutrients) indicate a systemic problem.</li></ul></li></ul> | <input type="checkbox"/><br><input type="checkbox"/> | <input type="checkbox"/><br><input type="checkbox"/> |          |
| <p>12) Can the reviewer validate the accuracy of the nutrient analysis?</p> <ul style="list-style-type: none"><li>• Determine if the reviewer can validate that the nutrient analysis was conducted accurately and correctly and reflects the SFA's planned menu(s).</li><li>• If NO, provide TA and request immediate corrective action. If SFA is unable to implement corrective action, the SA must conduct the nutrient analysis.</li></ul>   | <input type="checkbox"/>                             | <input type="checkbox"/>                             |          |