

| <b>CRITERIA AND PROCEDURES</b>  |  |
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| <b>BROAD SUBJECT:</b><br><b>NUTRITIONAL STANDARDS/NUTRITION EDUCATION</b> | <b>NO: NSE-05-01</b>                             |
| <b>TITLE: Disclosure of Nutrition Information</b>                         | <b>EFFECTIVE DATE:</b><br><b>August 14, 2009</b> |

## **PURPOSE OF THIS CRITERIA/PROCEDURE –**

Schools that participate in the National School Lunch Program are accountable for maintaining high nutrition standards. 7 CFR 210(a)(1) states that “Schools must provide nutritious and well-balanced meals to all the children they serve.” 7 CFR 210(b) identifies the specific nutrition standards and dietary recommendations required of school meals, which are monitored by a periodic Healthy School Meals Initiative (SMI) review. In addition, 7 CFR 210(h) states that schools are encouraged to inform the students, parents, and the public about efforts they are making to meet the nutrition standards.

Disclosure of the nutritional analysis of individual menu items as well as the menu as a whole can validate the nutritional integrity of school meals and serve as a valuable public relations tool. The nutritional analysis of individual menu items and the complete menu are also essential tools for meeting the dietary needs of children with special needs.

The U.S. Department of Agriculture’s (USDA) non-discrimination regulation, 7 CFR 15(b) requires accommodations to the school meal for children with disabilities when the need is certified by a physician.

## **KEY TERMS AND DEFINITIONS -**

**Nutrient Analysis:** An analysis that is performed using the current version of a USDA approved software and according to procedures outlined in USDA’s *Nutrient Analysis Protocols*.

**Nutrition Disclosure:** Providing information to students, parents, school employees, and the community on the nutrient analysis of individual menu items, daily menus, and the menu for a school week. Nutrient analysis information can be provided in several ways: on the serving line, on printed materials such as menus and brochures, and on a school or school system’s website.

**SMI Review:** A review conducted at least once every five years, by State Agency (SA) staff to determine if the menus, for a sample school week, are in compliance with nutrient standards.

Georgia Department of Education  
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## CRITERIA AND/OR PROCEDURES -

1. Nutrition information or a nutrient analysis provided by the school or school system must be as accurate as possible. Accuracy is important for the integrity of the School Nutrition Program (SNP) and to maintain public confidence in the information provided. When nutrition information or a nutrient analysis is provided to students, parents, school employees, and/or the community, the school or school system is accountable for the information distributed.
2. Accurate nutrition information and/or an accurate nutrient analysis can be critical to meeting the dietary needs of students with special needs, including students who have food allergies requiring the elimination of certain foods or ingredients from their diet and students with diabetes who require careful balancing of food and medication.
3. A nutrient analysis must achieve the highest degree of accuracy possible by using the current version of a USDA - approved software and following procedures outlined in USDA's *Nutrient Analysis Protocols*.

Check for accuracy by taking the following steps:

- a. Compare the analysis to the menu to ensure that all menu items, including condiments, have been included.
- b. Select ingredients/menu items from the software database that are exactly the same as those used. If an exact match cannot be found in the database, the ingredient/menu item must be locally entered using nutrient data provided by the manufacturer.
- c. Ensure that the menu items in the analysis accurately reflect the cooking methods used, e.g. oven baked versus deep fried French fries.
- d. Check the nutrient analysis for possible errors by looking at per portion nutrient values for each menu item. Check any that seem out of range when compared to the manufacturer's nutrient data or to USDA's National Nutrient Database, available at:  
<http://www.nal.usda.gov/fnic/foodcomp/search/> .
- e. Update the analysis as food products, menus or recipes change.
- f. Train the school nutrition staff to receive products in accordance with written specifications, to follow recipes and to serve planned portion sizes.

4. Ensure that any claims made, such as “low fat” or “high fiber,” meet Food and Drug Administration (FDA) labeling rules for nutrient content claims, available at this site, <http://www.fda.gov/Food/LabelingNutrition/LabelClaims/default.htm> . Check claims made by manufacturers against FDA rules before making the same claims on nutrition and menu information provided by the SNP.
5. Not all school systems are required to perform a nutrient analysis, depending upon the menu planning option that is approved. If the school system is not doing a nutrient analysis, the director could consider contracting with an experienced consultant to perform this function or the director could disclose the results of the analysis once it is completed by the SA staff during an SMI review.
6. If an accurate nutrient analysis of the menus being served is not available, the nutritional qualities of selected food items, such as 1/2% low fat chocolate milk, might be promoted to the parents, faculty and community.
7. To be effective, nutrition information and/or nutrient analyses must be easily available to students, parents, school employees, and the community. Consider the following means of distribution:
  - a. Provide nutrition information on serving lines, focusing on information about individual menu items that is concise and can be read at a glance.
  - b. Provide nutrient analysis information, as space allows, on printed menus that are posted in schools and sent home to parents.
  - c. Post a detailed nutrient analysis in the cafeteria for viewing by students, parents, and school employees who have the need or desire for in-depth information.
  - d. Provide school nurses with a nutrient analysis for every week in the menu cycle that shows nutrients per portion for each menu item. This analysis is critical for their use in assisting students with diabetes. These analyses should also be available upon request to parents for use in assisting students with special needs.
  - e. The menu and nutrient analysis can be uploaded to a school or school system web site. It is important to remember that information on the web can be accessed worldwide and should support the school's service of reimbursable meals that meet USDA nutrient standards.
  - f. Be prepared to provide ingredient information on food allergens, such as peanuts, eggs, shellfish, etc. Collect data on menu items that contain ingredients that are common food allergens. Update data regularly as recipes and food products change. Read about FDA requirements for manufacturers on food allergen disclosure on food labels at <http://www.cfsan.fda.gov/~dms/wh-alrgy.html> .

## REFERENCES:

Chapter 7, Code of Federal Regulations, Parts 210.10(a), (b) and (h)

Chapter 7, Code of Federal Regulations, Part 15(b)

*Nutrient Analysis Protocols: How to Analyze Menus for USDA's School Meals Program*, (USDA Publication). <http://teamnutrition.usda.gov/Resources/nutrientanalysis.html>

*Accommodating Children with Special Needs in the School Meals Programs*, (USDA Publication). [http://www.fns.usda.gov/cnd/Guidance/special\\_dietary\\_needs.pdf](http://www.fns.usda.gov/cnd/Guidance/special_dietary_needs.pdf)

USDA approved nutrient analysis software:

[http://schoolmeals.nal.usda.gov/Approved\\_SW/index.html](http://schoolmeals.nal.usda.gov/Approved_SW/index.html)

USDA National Nutrient Database:

<http://www.nal.usda.gov/fnic/foodcomp/Data/SR17/sr17.html>

<http://www.nal.usda.gov/fnic/foodcomp/search/>

Food and Drug Administration web sites on food labeling:

<http://www.cfsan.fda.gov/label.html>

<http://www.cfsan.fda.gov/~dms/wh-alrgy.html>

<http://www.fda.gov/Food/LabelingNutrition/LabelClaims/default.htm>