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SUBJECT: Meal Requirements Under the National School Lunch Program and School Breakfast Program: Questions and Answers for Program Operators Updated to Support the Transitional Standards for Milk, Whole Grains, and Sodium Effective July 1, 2022

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TO: Regional Directors  
Special Nutrition Programs  
All Regions

State Directors  
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All States

<b>Issuing Agency/Office:</b>	FNS/Child Nutrition Programs
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<b>Replaces:</b>	SP 38-2019, <i>Meal Requirements under the National School Lunch Program and School Breakfast Program: Questions and Answers for Program Operators</i> , dated September 23, 2019
<b>Summary:</b>	These questions and answers provide guidance for recently published transitional standards for milk, whole grains and sodium.
<b>Disclaimer:</b>	

This memorandum includes questions and answers updated to incorporate changes codified by the final rule titled, *Child Nutrition Programs: Transitional Standards for Milk, Whole Grains, and Sodium* (87 FR 6984, February 7, 2022), effective July 1, 2022.

The attached questions and answers on meal requirements for the National School Lunch Program and School Breakfast Program have been updated to reflect the transitional standards for milk, whole grains and sodium which are intended to be transitional requirements in effect for school years (SY) 2022-2023 and 2023-2024. The majority of the questions and answers within this guidance are unchanged because they are not affected by the final rule. The Food and Nutrition Service (FNS) plans to promulgate a new rule for long-term meal pattern requirements to be effective starting in SY 2024-2025. In case of a delay, this updated guidance will remain effective until subsequent standards are promulgated through rulemaking. This memorandum rescinds and replaces

SP 38-2019, *Meal Requirements under the National School Lunch Program and School Breakfast Program: Questions and Answers for Program Operators*, dated September 23, 2019.

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.

**Original Signed**

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Acting Director  
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Attachment

Meal Requirements for the National School Lunch Program  
and School Breakfast Program

QUESTIONS & ANSWERS  
FOR PROGRAM OPERATORS

Note: Questions with updated responses are indicated with a  
yellow highlighted asterisk next to the question mark (?\*).

## TABLE OF CONTENTS

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GENERAL .....	4
FRUITS AND VEGETABLES .....	8
MEATS/MEAT ALTERNATES .....	17
GRAINS .....	18
MILK .....	27
SODIUM.....	29
CALORIES AND <i>TRANS</i> FAT .....	30
MEAL PATTERNS .....	31
MENU PLANNING.....	34
AGE/GRADE GROUPS .....	38
CREDITING .....	40
RESOURCES .....	43

**1. Why does USDA set meal patterns and dietary specifications for school meals?**

The Richard B. Russell National School Lunch Act requires school meals to reflect the recommendations of the Dietary Guidelines for Americans (Dietary Guidelines). Minimum standards for school meals are essential to help ensure that all schools nationwide follow uniform, science-based standards to deliver wholesome meals in the most efficient and effective way. Minimum nutrition standards also support Program integrity and the responsible use of taxpayers' money by ensuring that children are offered wholesome foods that optimize health and academic achievement and minimize the risk of long-term chronic diseases.

**2. What are the basic meal requirements?\***

The National School Lunch and School Breakfast Program (NSLP and SBP, respectively) requirements are designed to provide age-appropriate meals to specific age/grade groups. For grades K-12, dietary specifications for calories, sodium, and saturated fat are in place to limit the risk of chronic diseases.

The NSLP requires five food components, each with daily and weekly minimums (see table below), including:

1. Fruits
2. Vegetables (including a grades K-12 weekly requirement for vegetable variety with minimum requirements for each of the 5 vegetable subgroups, including: dark green, red/orange, beans/peas (legumes), starchy, and “other” vegetables)
3. Grains<sup>1</sup>
4. Meats/Meat Alternates
5. Fluid Milk

For a chart detailing NSLP meal pattern requirements, please see:

<https://www.fns.usda.gov/resource/national-school-lunch-program-meal-pattern-chart>.

The SBP requires three food components, each with daily and weekly minimums (see table below), including:

1. Fruits (Vegetables may be offered in place of fruit, see Q12)
2. Grains<sup>2</sup> (Meats/Meat Alternates may be offered in place of Grains, see Q40)
3. Fluid Milk

For a chart detailing SBP meal pattern requirements, please see:

<https://www.fns.usda.gov/sbp/meal-pattern-chart>.

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<sup>1</sup> Beginning school year (SY) 2022-2023, at least 80% of the grains offered weekly must be whole grain-rich; the remaining grains must be enriched.

<sup>2</sup> Beginning school year (SY) 2022-2023, at least 80% of the grains offered weekly must be whole grain-rich; the remaining grains must be enriched.

### **3. May schools modify Program meals for children whose disabilities restrict their diet?**

Yes. Schools are required, both by law and Program regulations, to make reasonable modifications to meals and snacks for students with a disability that restricts their diet.

Many meal modifications can be made within the meal pattern (e.g., substituting one food item for another within the same component). For modifications within the meal pattern, FNS does not require a medical statement. However, the State agency has discretion to require a medical statement, and schools are encouraged to keep a record of the student's meal modification on file. Using offer versus serve is not an allowable way to reasonably accommodate a student's disability (see Q10).

Some students require meal modifications that do not fit within the meal pattern requirements. In situations where a child requires a meal modification that does not fit within meal pattern requirements, a medical statement signed by a State licensed health care professional is required in order for the meal to be reimbursable.

Schools have discretion to provide fluid milk substitutions with a note from a State licensed health care professional or a note from the child's parent or guardian (7 CFR 210.10(m)(2)(ii)(B)). See Q67 for additional information.

For additional information, please refer to SP 59-2016, *Modifications to Accommodate Disabilities in the School Meal Programs* at <https://fns.usda.gov/sites/default/files/cn/SP59-2016os.pdf> and SP 26-2017, *Accommodating Disabilities in the School Meal Programs: Guidance and Questions and Answers* at <https://www.fns.usda.gov/cn/accommodating-disabilities-school-meal-programs-guidance-qas>.

### **4. May schools provide menu variations for children with dietary preferences that are not disabilities?**

Yes, provided the variations meet the meal pattern requirements. Schools are encouraged to consider students' dietary preferences, including cultural, religious, and ethical preferences, when planning and preparing meals. In a non-disability situation, modifications must meet meal pattern requirements for meals to be reimbursable.

There are additional requirements for schools that opt to provide milk substitutions for non-disability reasons. See Q67 for additional information.

### **5. Which meal patterns apply to preschool children in schools?**

Schools are encouraged to offer students age-appropriate meals. Schools serving meals to infants and preschool-aged children must comply with the meal patterns for infants and preschool age children established in 7 CFR 210.10(p) for lunch and in 7 CFR 220.8(o) for breakfast. However, when schools serve preschoolers and K-5 students together, in the same area and at the same time, schools have flexibility to offer a single menu using the K-5 meal pattern in 7 CFR 210.10(c) for lunch and in 7 CFR 220.8(c) for breakfast. For additional information, see Q97, Q98, and SP 37-2017 *Flexibility for Co-Mingled Preschool Meals*:

*Questions and Answers* online at <https://www.fns.usda.gov/cn/flexibility-co-mingled-preschool-meals-questions-and-answers>.

**6. What type of signage must schools have to identify a reimbursable meal(s) to students?**

Schools are required to identify to students, near or at the beginning of the serving line and prior to the POS, all of the food items that constitute a reimbursable meal at both breakfast and lunch. This is to help students select the foods that make a reimbursable meal in the appropriate quantities. State agencies and schools can design signage to fit their students, menus, facilities, layout and other considerations. Signage should be age-appropriate and visible. Providing detailed information about the components, such as identifying the vegetable subgroups, is an excellent teaching tool, but is not required.

Foods that are a part of the reimbursable meal do not have to be adjacent to each other, but they must be labeled, listed, or otherwise identified near or at the beginning of the serving line so the students can easily choose all the components for a reimbursable meal and not unknowingly incur a la carte charges.

## FRUITS AND VEGETABLES

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### FORMS AND TYPES, CREDITABLE AMOUNTS, FRUIT/VEGETABLE COMBINATIONS, JUICE CREDITING, FROZEN FRUIT, AND VEGETABLE SUBGROUPS

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#### **7. What forms of fruits are required?**

Schools may offer fruits that are fresh, frozen, dried, or canned in light syrup, water, or fruit juice. Pasteurized, full-strength (100%) fruit juice also may be offered (in either liquid or frozen form) to meet up to one-half of the fruits component offered over a week. The meal patterns specify the required quantities of fruit for each age/grade group. Juice in gelatin may not credit unless visible fruit is also present in the gelatin.

#### **8. What types of vegetables are required?**

Schools may offer fresh, frozen, or canned vegetables. Dry beans and peas (legumes) may also be offered. Over the course of a week, schools serving the K-12 meal patterns must offer all vegetable subgroups established in the Dietary Guidelines, including: dark green, red/orange, dry beans/peas (legumes), starchy, and “other” vegetables. The lunch meal patterns specify the required minimum weekly quantities for each subgroup. Vegetable subgroups are not required in the preschool meal pattern. Pasteurized, full-strength (100%) vegetable juice also may be offered (in either liquid or frozen form) to meet up to one-half of the vegetables component offered over a week.

#### **9. Where are the required vegetable subgroups identified?**

Consistent with the Dietary Guidelines, 7 CFR 210.10(c)(2)(iii) identifies the required vegetable subgroups. The *Food Buying Guide for Child Nutrition Programs* also identifies each vegetable by subgroup. See *Section 2 Vegetables*, available at: <https://foodbuyingguide.fns.usda.gov/>. Vegetable subgroups are only required in K-12 meal patterns; the preschool meal pattern does not require vegetable subgroups to be offered.

#### **10. How can schools minimize plate waste while requiring students to take a fruit or a vegetable as part of the meal?**

Schools may use several strategies to minimize plate waste. Such strategies include: conducting taste tests before introducing foods on the menu, creative marketing/presentation of foods, engaging students in Farm to School activities, and using self-service salad bars. It is also important that schools produce only the amount of food needed to serve students based on past selection history and allow students enough time to eat their meals.

The Offer versus Serve (OVS) policy allows students to decline foods they do not want to eat. For example, students may take smaller portions of the fruits and vegetables components, if desired. All five components must be offered in the minimum required quantities but, under OVS, students have the option to select a minimum of three components at lunch or three food items at breakfast, including at least a ½ cup of fruits or vegetables, to build a reimbursable meal.



For additional tips, see:

- *Menu Planner for School Meals* (<https://www.fns.usda.gov/tn/menu-planner>)
- *Farm to School* (<https://www.fns.usda.gov/cfs/farm-school-resources>)
- *Offer Versus Serve Guidance* (<https://fns.usda.gov/sites/default/files/cn/SP41-2015av2.pdf>)

**11. Are schools required to offer the vegetable subgroups at lunch in any specific sequence during the week?**

No, the menu planner decides when and how to offer the required vegetable subgroups at lunch.

**12. Can a school offer vegetables in place of fruits at breakfast?**

Yes. Vegetables are not required in the SBP, but schools may choose to offer vegetables in addition to, or in place of, fruits.

Current regulations state that, in order to offer starchy vegetables at breakfast, at least 2 cups of red/orange, dark green, legumes, or “other” vegetable subgroups must also be offered on the menu within that week. However, effective through June 30, 2022 Congress restricted the enforcement of this provision. This means that schools may offer any vegetable in place of fruits at breakfast, including potatoes and other starchy vegetables, without including at least 2 cups of vegetables from the red/orange, dark green, legumes, or “other” vegetable subgroups in the weekly menu (Consolidated Appropriations Act, 2021, Section 743). FNS will work to notify state and local agencies if there is an extension or change to this policy from Congress.

**13. How should schools credit a vegetable mixture toward the vegetable subgroup requirements?**

Schools may use manufacturer-provided data that clearly documents the ratio of vegetables in the ingredients list and credit the amounts toward vegetable subgroup requirements. For example, if a mixture provides 25% broccoli, 25% carrots, and 50% cauliflower, then a 1 cup serving of this blend provides ¼ cup broccoli (dark green), ¼ cup carrots (red/orange), and ½ cup cauliflower (other). Offering a vegetable blend does not require monitoring that each portion contains exactly the documented ratios.

If documentation does not exist, Program operators can estimate how much of each subgroup is in a vegetable mixture and credit it toward the appropriate subgroup. At least ⅛ cup of a vegetable must be present to credit toward vegetable subgroup requirements. If the quantities of different vegetables are not known and cannot be estimated, the vegetable mixture can credit as additional vegetables necessary to meet daily and/or weekly vegetable minimums.

**14. May a student select a combination of fruits to meet the required fruits component for a reimbursable meal?**

Yes. Students may select a single type of fruit or a combination of fruits to meet the fruits component requirement.

**15. What is the minimum amount of a fruit or vegetable that can credit toward the meal pattern?**

For fruits and vegetables (including dried fruits and vegetables), the minimum creditable serving size is  $\frac{1}{8}$  cup. Raw, leafy greens credit differently; the minimum creditable serving size is  $\frac{1}{4}$  cup (i.e.,  $\frac{1}{4}$  cup of raw, leafy greens credits as  $\frac{1}{8}$  cup of vegetables; see Q16). For additional information on crediting, see the *Food Buying Guide for Child Nutrition Programs* (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>).

**16. How do leafy greens credit toward meal pattern requirements?**

Consistent with the Dietary Guidelines, raw, leafy greens credit for half the volume served. For example, a  $\frac{1}{2}$  cup of raw romaine lettuce contributes  $\frac{1}{4}$  cup toward the dark green vegetable subgroup. Cooked leafy greens (e.g., sautéed spinach) credit by volume served; for example,  $\frac{1}{2}$  cup of cooked spinach credits as  $\frac{1}{2}$  cup of dark green vegetables.

**17. How does dried fruit credit toward meal pattern requirements?**

Consistent with the Dietary Guidelines, whole dried fruit and whole dried fruit pieces credit for twice the volume served. For example, a  $\frac{1}{4}$  cup of raisins contributes  $\frac{1}{2}$  cup fruit toward the fruit requirement. The minimum creditable serving size remains  $\frac{1}{8}$  cup. This means that  $\frac{1}{8}$  cup of raisins credits as  $\frac{1}{4}$  cup fruit, but  $\frac{1}{16}$  cup raisins does not credit (it is below the minimum creditable amount).

**18. Are frozen and dried fruit with added sugar allowed?**

Yes. Dried fruit is sometimes processed with sugar to keep the fruit pieces separated, and may be added to frozen fruits to help preserve color and vitamins. Although these types of products are allowed, schools must be aware of the maximum calorie limits when offering any food with added sugar as part of the reimbursable meal.

**19. Do 100% fruit strips, fruit drops or other fruit or vegetable products typically consumed as snacks (e.g., vegetable chips, freeze-dried fruits/vegetables) contribute toward meal pattern requirements?**

Only fresh, frozen, or canned fruits and vegetables; dried fruits and vegetables; and 100% full-strength juice may contribute toward the fruits and vegetables components.

Foods that do not credit toward the fruits and vegetables components include:

- Fruit strips, drops, and leathers that were previously credited by calculating the whole-fruit equivalency using the revoked Food and Drug Administration (FDA)

standard of identity for canned fruit nectars (21 CFR 146.113).<sup>3</sup> Freeze-dried fruits/vegetables;

- Fried banana chips; and
- Potato/vegetable chips.

Additional information on crediting fruits and vegetables is available in the *Food Buying Guide for Child Nutrition Programs* (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). A complete discussion of fruit strips, drops, and leathers can be found in the preamble of the final rule (p. 4101-4102), *Nutrition Standards in the National School Lunch and School Breakfast Programs* (77 FR 4088, published January 26, 2012).

## **20. Do Child Nutrition (CN)-Labeled products that include vegetables provide crediting information for the vegetable subgroups?**

Yes. CN Labels are for main dish products that contribute to the meats/meat alternates component of the meal pattern requirements. When a mixed dish also contains vegetables, the CN label documents the creditable amounts of dark green, red/orange, beans/peas (legumes), starchy, and other vegetables.

## **21. May a school serve ½ cup fruit pieces and ½ cup fruit juice?**

Yes. A school may serve ½ cup fruit pieces and ½ cup of 100%, full-strength fruit juice on one or more days if the total weekly juice offered does not exceed one-half of the total fruit offered for the entire week (for grades K-12). For preschoolers, fruit and/or vegetable juice may be offered at one meal, including snack, per day.

## **22. Can 100%, full-strength vegetable juice blends contribute toward a vegetable subgroup?**

Yes, for grades K-12, up to half of the weekly vegetables may be offered in the form of full-strength juice. For preschoolers, juice may be offered at one meal, including snack, per day. Program operators may obtain a product formulation statement from a manufacturer that shows the amounts of specific subgroups in vegetable juice mixtures and credit them accordingly (assuming the minimum creditable amount of ⅛ cup is present).

Without manufacturer documentation:

- Full-strength vegetable juice blends that contain vegetables from the same subgroup may contribute toward that vegetable subgroup.
- Vegetable juice blends containing vegetables from more than one subgroup may contribute to the additional vegetables required to meet daily/weekly minimums.

For example, a full-strength carrot/tomato vegetable juice blend may credit toward the red/orange vegetable subgroup. However, a full-strength vegetable juice blend containing carrots, spinach, tomato and watercress, may only credit toward the additional vegetables required to meet daily/weekly minimums.

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<sup>3</sup> FDA revoked the standard of identity for canned fruit nectars through a final rule published in the Federal Register (60 FR 56513) on November 9, 1995; therefore, there is no regulatory basis to credit these snack-type fruit products.

**23. Can 100% fruit and vegetable juice blends contribute to a reimbursable meal?**

Yes, up to half of the weekly fruits and vegetables may be offered in the form of full-strength juice. For preschoolers, fruit and/or vegetable juice may be offered at one meal, including snack, per day. Program operators may obtain a product formulation statement from a manufacturer that shows the amounts of specific juice mixtures and credit them accordingly (assuming the minimum creditable amount of ½ cup juice for each subgroup being credited is present). The vegetable juice and fruit juice limits are assessed separately.

Without manufacturer documentation, 100% fruit/vegetable juice blends credit as follows:

- If the first ingredient is fruit juice, the juice blend can contribute to the fruits requirement.
- If the first ingredient is a vegetable juice, the juice blend can contribute toward the additional vegetables required to meet daily/weekly minimums.

**24. Does the juice limit apply daily or over the school week?**

For grades K-12, the provision that limits juice to no more than half of the fruits and vegetables offered applies over a week. Therefore, schools may serve larger quantities of 100% fruit or vegetable juice on some days, provided the total weekly juice offered does not exceed one-half of the total creditable fruits or vegetables offered for the entire week. The vegetable juice and fruit juice limits are assessed separately.

For preschoolers, fruit and/or vegetable juice may be offered at one meal, including snack, per day.

**25. Does the limit on juice to half of the fruits component mean that schools that serve 4 fluid ounces (fl. oz.) of juice to elementary students can only credit 2 ounces toward the fruits component?**

No. Juice credits as the volume served, so 4 fl. oz. credits as ½ cup. For grades K-12, no more than one-half of the fruit or vegetable offerings over the week may be in the form of juice. Preschoolers may be offered fruit and/or vegetable juice at one meal per day (including snack). Additionally, all juice must be 100% full-strength juice; diluted or concentrated juice is not creditable.

**26. Is frozen, 100% fruit juice allowed in school meals?**

Yes. Frozen 100% fruit juice, with or without added sugar, can be credited. For grades K-12, liquid or frozen 100% juice may be used to meet up to half of the weekly fruits component at lunch or breakfast. Preschoolers may be offered liquid or frozen 100% juice at one meal per day (including snack). Frozen, 100% juice credits based on the fluid volume prior to freezing. Schools should request this information from manufacturers.

## 27. How is the juice limit assessed if multiple fruits/vegetables and 100% juices are offered each day?

The vegetable juice and fruit juice limits are assessed separately; additionally, calculate totals for SBP and NSLP separately. To check compliance with the juice limit, determine the total amount of 100% juice a child is able to select over the course of the week in cups, then divide by the total cups of fruits or vegetables a child is able to select (solid fruits or vegetables + juice). No more than half of the total weekly meal pattern fruit component quantity may be in the form of juice.

Juice and/or light syrup in canned fruit or fruit cups may count toward the fruits component, and are not subject to the weekly juice limit. For example, a 4 fl. oz. cup of fruit in light syrup credits as ½ cup of fruit. This crediting is based on volume (fl. oz.), rather than weight (oz.). Based on weight, a ½ cup fruit and light syrup will often (if not always) weigh more than 4 oz.

Example:

- A school (with a 5-day school week) offers the following fruits each day: ½ cup peaches, ½ cup applesauce, ½ cup oranges, and ½ cup grape juice.
- The school instructs students to select 2 out of 4 choices or 1 cup fruit daily = 5 cups fruit weekly
- The amount of juice offered weekly (2.5 cups) is half of the total amount of fruit offered weekly (5 cups) and, therefore, is compliant.

$$\frac{2.5 \text{ cups of juice}}{5 \text{ cups of fruit}} = 50\%$$

## 28. How does juice concentrate credit?

There are four ways to credit juice toward the fruit requirements:

- 100% liquid juice not from concentrate,
- 100% frozen juice not from concentrate,
- 100% liquid juice reconstituted from concentrate, and
- 100% frozen juice reconstituted from concentrate.

Juice concentrates can be used only when reconstituted with water to 100% full-strength juice and can be credited in the forms of liquid (including 100% carbonated juice) or frozen juice only. Therefore, juice concentrate cannot be credited when used as an ingredient in another food or beverage unless it is reconstituted to 100% full-strength. For example:

- A smoothie is made with bananas, peaches, orange juice concentrate, and the appropriate amount of water to make the juice concentrate full-strength 100% juice. The reconstituted orange juice in the smoothie may credit toward the fruits requirement.
- One-quarter cup of gelatin made with 1 tablespoon of juice concentrate and water does not contribute as one quarter cup of juice since the fruit juice used is not full-strength liquid or frozen juice. Juice in gelatin may not credit unless visible fruit is also present in the gelatin.

For additional information, see the *Food Buying Guide for Child Nutrition Programs* (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>).

**29. Do the vegetable subgroups count when determining the vegetable juice limit?**

Yes. The total amount of vegetables offered, including all subgroups, counts when determining the vegetable juice limit. No more than half of the total vegetables offered over the week may be in the form of juice. Please note the vegetable juice limit is assessed independently of the fruit juice limit.

$$\frac{\text{Total cups of vegetable juice}}{\text{Total cups of vegetables (solid + juice)}} \leq 50\%$$

**30. If a school has multiple serving lines with different menu items, must each serving line offer all of the vegetable subgroups weekly?**

Yes. This ensures that all students have access to all of the vegetable subgroups throughout the week regardless of the serving line selected. For example, a child who picks the pizza line consistently would have access to all vegetable subgroups throughout the week. Another solution could be to offer a centrally located salad bar that all students can access.

**31. May schools offer the vegetable subgroups a couple of different times over the week in small amounts that add up to the required amount for the full week?**

Yes. Schools can break up the subgroup requirement across the week provided the week's menu as a whole meets the full subgroup requirements AND the school offers the minimum amount of vegetables required each day. The minimum creditable amount is 1/8 cup. For example, one day a school offers a 1/2 cup of bean/corn salsa that includes 1/4 cup of beans per serving and another day that week the school offers a bean burrito that supplies another 1/4 cup of beans. This example assumes that the school is providing additional vegetables with each of these meals to meet the minimum daily vegetable requirement (1 cup for grades 9-12 and 3/4 cup for grades K-8).

**32. Are there maximum limits on the amount of vegetable subgroups offered at lunch?**

No. Local menu planners can offer students as many vegetables as they like, as long as meals, on average, meet the weekly dietary specifications for calories, saturated fat, *trans* fat, and sodium. Schools receive the same per meal reimbursement, whether the minimum requirements are met or exceeded.

**33. How may schools include beans/peas (legumes) in school lunch menus?**

Dry/mature beans and peas may be offered either as a meat alternate or as a vegetable, but not as both in the same meal. Menu planners must determine in advance how to count beans/peas in a meal. For example, refried beans can be offered as a vegetable in one meal, and as a meat alternate in a different meal. When a school offers refried beans as a vegetable, the refried beans credit toward the weekly beans/peas vegetable subgroup requirement.

Refried beans that are offered as a vegetable cannot simultaneously credit toward the meats/meat alternates requirement (because double-counting would reduce overall calories).

Pasta products made of vegetable flour may also credit as legumes, and are an innovative way to offer vegetables in a food item that is popular with children. For example, pasta made of 100 percent red lentil flour credits toward the weekly ½ cup legumes requirement.

For additional tips, see:

- *Menu Planner for School Meals* (<https://www.fns.usda.gov/tn/menu-planner>)
- *Food Buying Guide for Child Nutrition Programs* (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>)
- *Crediting Pasta Products Made of Vegetable Flour in the Child Nutrition Programs* (Policy memo SP 26-2019, CACFP 13-2019, SFSP 12-2019; published April 17, 2019) (<https://www.fns.usda.gov/cn/crediting-pasta-products-made-vegetable-flour-child-nutrition-programs>)

**34. May a school use a food product that contains less than ⅛ cup of vegetables?**

Yes. However, the school must offer vegetables in the required minimum amounts each day, and over the course of the week, from other sources to meet the daily and weekly vegetable minimums. Foods containing less than ⅛ cup vegetables do not contribute toward meal pattern requirements.

**35. If a school offers two servings of beans/peas (legumes) during one meal, can one serving count as a vegetable and one serving count as a meat alternate?**

Yes. A school may offer two distinct servings of beans/peas (legumes) in one meal if they are contained in two separate dishes. For example, legumes may be offered as part of a salad (vegetables component) and as part of chili/bean soup (meats/meat alternates component).

**36. Can home-canned foods be included in school meals?**

No. Home-canned products are not allowable in the SBP or NSLP due to food safety concerns. However, canned food items (including those produced locally) may be offered in school meals if they are produced and processed in an approved facility and meet all Federal, State, and local food safety and health guidelines.

**37. Can roasted legumes, such as chickpeas and edamame (immature soy beans), be offered in school meals?**

Yes. Roasted legumes may credit toward the vegetable (legumes) or meats/meat alternates requirements, and may be good choices for adding texture to salad bars. Similar to nuts and seeds, bulk, roasted legumes may be offered:

- As a meat/meat alternate to meet the daily meats/meat alternates requirements (see Q102), or

- As a vegetable to meet daily/weekly vegetable minimums and the ½ cup weekly legumes requirement.<sup>4</sup>

Menu planners have discretion to offer foods customarily consumed as snacks as part of a reimbursable meal. All foods offered as part of a reimbursable meal are subject to the weekly dietary specifications.

### **38. What resources are available to help categorize unusual vegetables?**

The following websites have information on vegetable subgroups:

*USDA's MyPlate Vegetable Subgroups Website*  
<https://www.myplate.gov/eat-healthy/vegetables>

*USDA Food Patterns: Item Clusters, Percent of Consumption, and Representative Foods*  
[https://fns.usda.gov/sites/default/files/usda\\_food\\_patterns/ItemClustersAndRepFoods.pdf](https://fns.usda.gov/sites/default/files/usda_food_patterns/ItemClustersAndRepFoods.pdf)

*Food Buying Guide for Child Nutrition Programs*  
<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>)

### **39. Is a mixed salad required to consist of all dark green vegetables or can iceberg lettuce be part of the mix?**

Menu planners have discretion to decide what makes up a “mixed salad.” Mixed salads can include a variety of greens and/or vegetables and can credit toward the appropriate vegetable subgroups if a minimum of ⅛ cup is offered. Uncooked, leafy greens credit as half of the volume served (e.g., 1 cup of leafy greens counts as ½ cup of vegetables). A mixed salad with a variety of dark green vegetables (e.g., spinach and romaine lettuce) may credit toward the dark green subgroup. Iceberg lettuce is not a dark green vegetable but may credit toward the “other” vegetable subgroup if at least ⅛ cup is offered.

If the mixed salad contains different vegetable subgroups and the quantities of each subgroup are known or can be estimated, they can be credited toward the appropriate subgroups. If the quantities are not known and cannot be estimated, a mixed salad may credit toward the additional vegetables needed to meet daily/weekly minimums.

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<sup>4</sup> Nuts, seeds, and soy nuts may be offered to meet up to half of the meats/meat alternates requirements, but may not be offered as a vegetable or to meet the weekly legumes requirement.



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MEATS/MEAT ALTERNATES  
REQUIREMENTS, TOFU CREDITING

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**40. Is a daily meat/meat alternate required at breakfast?**

No. Schools are not required to offer a meat/meat alternate at breakfast. However, schools that offer 1 oz. eq. of grains daily may offer meats/meat alternates to count toward the grains requirement in the SBP. Meats/meat alternates may also be offered in the SBP as “extra” food items that do not count toward meal pattern requirements, but are subject to dietary specifications (calories, saturated fat, *trans* fat, and sodium).

Under the preschool meal patterns, schools may substitute the entire grains component with a meat/meat alternate at breakfast a maximum of three times per week.

**41. How does tofu credit?**

Firm or extra firm tofu in stir-fries, omelets, and miso soup may credit towards the meat alternate component. However, for miso soup, the miso paste dissolved into the broth does not credit. Similarly, a soft tofu, pureed into a soup, does not credit because it is not recognizable and does not represent a meat substitute. Therefore, the blended tofu is not creditable.

Tofu must also be commercially prepared, and meet the following definition, established in 7 CFR 210.2 and 226.2 as “a soybean-derived food...basic ingredients [in tofu] are whole soybeans, one or more food-grade coagulants (typically a salt or an acid), and water.” Noncommercial tofu and soy products are not creditable. In the School Meal Programs, 2.2 ounces (¼ cup) of commercially prepared tofu, containing at least 5 grams of protein, is creditable as 1 oz. eq. of meat alternate. This is consistent with the Dietary Guidelines recommended serving size for tofu, and provides protein and nutrients of concern at levels similar to other CN-credited meat alternate foods. For additional information on crediting tofu, see SP 53-2016, *Crediting Tofu and Soy Yogurt Products in the School Meal Programs and the Child and Adult Care Food Program*, available at: [https://fns.usda.gov/sites/default/files/cn/SP53\\_CACFP21\\_2016os.pdf](https://fns.usda.gov/sites/default/files/cn/SP53_CACFP21_2016os.pdf).

**42. May schools exceed the weekly maximum for the meats/meat alternates component?**

Yes. The weekly ranges (minimum and maximum levels) for the meats/meat alternates and grains components help schools plan and offer age-appropriate and well-balanced meals. However, on an administrative review, school meals that exceed the weekly maximum limits are compliant, provided that meals (on average) meet the weekly dietary specifications. Schools receive the same per meal reimbursement, whether the minimum requirements are met or exceeded.

## GRAINS

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### WHOLE GRAIN-RICH REQUIREMENT, QUANTITIES, BREADING, CREDITABLE AMOUNTS, GRAIN-BASED DESSERTS

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#### 43. What is the grains requirement in NSLP and SBP?\*

For all grades, schools must offer a minimum amount of grains daily and weekly; the amount varies by age/grade group (see Q2).

For grades K-12, at least 80% of all grains offered over the course of a week must be whole grain-rich. The remaining 20% or less of grains, if any, must be enriched and measured in ounce equivalencies using weights and/or volumes found in Exhibit A of the *Food Buying Guide for Child Nutrition Programs* (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>). A whole grain-rich product contains 50% or more whole grains by weight, with any remaining grains being enriched. If meats/meat alternates are substituted for grains in the SBP, the whole grain-rich requirement only applies to the actual grains offered (see Q55).

Foods that meet the whole grain-rich criteria for the school meal programs contain 100% whole grain or a blend of whole-grain meal and/or flour and enriched meal and/or flour of which at least 50% is whole grain.

Preschoolers must be offered whole grain-rich foods at least once per day.

#### 44. Are schools required to offer a whole grain-rich item every day?\*

For grades K-12, at least 80% of the weekly grains offered must be whole grain-rich, and any remaining grains offered must be enriched. The 80% is a minimum weekly requirement, meaning schools may choose to have more than 80% of the weekly grains offered be whole grain-rich. There is no daily whole grain-rich requirement. If a school has multiple serving lines, grains offered on each serving line must be at least 80% whole grain-rich over the course of the week. Schools are encouraged to structure menus that promote whole grain-rich food items rather than creating competition between whole grain-rich and enriched food items.

Preschoolers, however, must be offered whole grain-rich foods in at least one meal or snack per day.

#### 45. How may schools identify whole grain-rich products?

Schools can use the following as a simple checklist to evaluate if a grain product meets the “at least 50 percent” portion of the whole grain-rich criteria.

- **Evaluate a grain product using the following two-element criterion developed by the National Academy of Medicine (formerly the Institute of Medicine):**

Element #1 A serving of the food item must provide at least ¼ oz. eq. of grains as defined by Exhibit A, found in the *Food Buying Guide for Child Nutrition Programs* (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>).

AND

Element #2 Food must meet at least one of the following:

a) The whole grains per serving (based on minimum serving sizes specified for grains in FNS guidance) must be  $\geq 8$  grams. This may be determined from information provided on the product packaging or by the manufacturer, if available. Also, if a grain product contains a meat/meat alternate, manufacturers may apply for a CN Label to indicate the oz. eq. of grains in a food product.

b) The product includes one of the following FDA-approved whole grain health claims on its packaging and any refined grain contained in the product is enriched:

*“Diets rich in whole grain foods and other plant foods and low in total fat, saturated fat and cholesterol may reduce the risk of heart disease and some cancers”*

or

*“Diets rich in whole grain foods and other plant foods, and low in saturated fat and cholesterol, may help reduce the risk of heart disease”.*

c) Whole grains are first on the product ingredient list (with the exception of water), specifically:

- Non-mixed dishes (e.g., breads, cereals): A whole grain is the first ingredient in the list (whole grains must be the primary ingredient by weight). Any other grains must be enriched.
- Mixed dishes (e.g., pizza, corn dogs): A whole grain is the first grain ingredient in the list (whole grains must be the primary ingredient by weight). Any other grains must be enriched.

A ready-to-eat (RTE) breakfast cereal must list a whole grain as the primary ingredient, and the cereal must be fortified. RTE breakfast cereals that are 100 percent whole grain and do not contain other refined grains are not required to be fortified. These unfortified, 100 percent, whole grain, RTE breakfast cereals sometimes contain an insignificant amount (less than 2% by weight) of non-creditable, refined grains and can still credit.

The product ingredient list (Element #2c of the above criterion) is a practical way for schools to identify whole grain-rich products because manufacturers are not required to provide information about the grams of whole grains on their products.

- **Find a grain product on any State agency’s Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)-approved whole grain food list.**

Any grain product found on any State agency’s WIC-approved whole grain food list meets all Child Nutrition Program whole grain-rich criteria. Program operators can obtain a copy of a State agency’s WIC- approved whole grain food list by contacting the WIC State agency. For a list of WIC State agency contacts, please see <https://www.fns.usda.gov/contacts/contact-map>.

**46. May schools offer 100% whole grain products to meet the whole grain-rich requirement?\***

Yes, foods that are 100% whole grain meet the “whole grain-rich” requirement. Although schools are not required to offer 100% whole grain products, those labeled as “whole wheat bread,” “entire wheat bread,” “whole wheat rolls,” “entire wheat rolls,” “whole wheat buns,” and “entire wheat buns” are 100% whole wheat per FDA Standards of Identity and may be offered to meet the requirement to make at least 80% of the grains whole grain-rich. FDA also sets standards of identity for specific whole grain pasta products that credit as whole grain-rich grains: products labeled as “whole wheat macaroni product,” “whole wheat macaroni,” “whole wheat spaghetti,” and “whole wheat vermicelli” are also 100% whole grain.

**47. Does the whole grain-rich requirement apply to the grain content of the product or to the weight of the product?**

To be whole grain-rich, the grain content of a product must contain at least 50% or more whole grains by weight (of the grains in the product), and any remaining grains must be enriched. Non-creditable grains that make up less than 2% of the product (by weight) can be disregarded.

**48. Does the CN Label specify if whole grains are in a product? What about enriched grains?**

Yes. Products meeting the whole grain-rich criteria will continue to include the following language to declare a grains contribution within the CN Label crediting statement:

- X.XX oz. equivalent grains

Products that meet the enriched grain requirements (e.g., enriched bread) include the following language to declare a grain contribution within the CN Label crediting statement:

- X.XX oz. equivalent grains (enriched)

**49. May schools exceed the upper range of the grains component?**

Yes. The weekly maximum for grains helps schools plan and offer age-appropriate, well-balanced meals. However, school meals that exceed the weekly grains maximum are considered compliant during an administrative review (assuming other requirements, including dietary specifications, are met). Schools receive the same per meal reimbursement, whether the minimum requirements are met or exceeded.

**50. May a school serve more than 2 oz. eq. of grains on any given day? For example, serve a 3 oz. eq. item, such as a pizza?**

Yes, a large serving of grains may be offered on any given day, as long as the weekly dietary specifications are met. State agencies assess compliance with the required daily and weekly minimum quantities, and the dietary specifications for calories, saturated fat, *trans* fat, and sodium, during an administrative review. The weekly maximum grain ranges serve as a guide to help menu planners offer age-appropriate and well-balanced meals.

**51. In a recipe for bread, would ingredients listed as 2 cups of whole wheat flour and 2 cups of enriched flour meet the whole grain-rich requirement?**

Yes. Assuming there are no other grains in the product, a product or ingredients containing 2 cups of whole wheat flour and 2 cups of enriched flour would meet the whole grain-rich requirement.

**52. Are fully cooked grain and pasta items with a nutrition label that lists water as the first ingredient, followed by a whole grain, considered whole grain-rich?**

Yes. A grain-based product is whole grain-rich if water is listed as the first ingredient on the ingredient label and a whole grain is listed as the second ingredient on the ingredient label.

Foods that meet the whole grain-rich criteria for the school meal programs contain 100% whole grain or a blend of whole-grain meal and/or flour and enriched meal and/or flour of which at least 50% is whole grain. The remaining 50% or less of grains, if any, must be enriched.

Some products include flour blends listed in the ingredient declaration. For example, Ingredients: Flour blend (whole-wheat flour, enriched flour), sugar, cinnamon, etc.

When trying to determine if whole grain is the primary ingredient by weight for these products, Program operators will need to know either that the whole-grain content is at least 50% of the grain ingredients by weight or that the weight of the whole grain is greater than the first ingredient listed after the flour blend (such as enriched flour and sugar in the example above).

**53. Can schools use the Whole Grain Stamp (from the Whole Grain Council) to determine if a food meets the whole grain-rich criterion?**

No. The Whole Grain Stamp provides useful information about the amount of whole grains in a product, but is not sufficient to determine if a food is whole grain-rich. Products that display the Whole Grain Stamp contain at least 8 grams of whole grain, but may also contain non-creditable grains (e.g., non-enriched, refined flour), which do not credit toward the grains requirements in Child Nutrition Programs. Program operators may instead use the options described in Q45 to determine if a grain product is whole grain-rich.

**54. May schools offer energy/granola bars at breakfast?**

For grades K-12, schools may offer energy bars, granola bars, cereal bars, and breakfast bars to credit toward the grains component (assuming the products are whole grain and/or enriched and other requirements, including dietary specifications, are met).

For preschoolers, schools may not credit energy bars, granola bars, cereal bars, and breakfast bars toward grains requirements, as they are considered grain-based desserts.

**55. Must schools offer a minimum of 1 oz. eq. of grains at breakfast daily, or may they offer meats/meat alternates in place of grains?\***

For grades K-12, schools must offer at least 1 oz. eq. of grains daily. If 1 oz. eq. of grains is offered daily, schools may offer meats/meat alternates that credit toward the total daily/weekly grains requirements. The weekly range for grains goes up to 10 oz. eq. for grades K-12, so schools have the option to offer 1 oz. eq. of both grains and meats/meat alternates every day at breakfast and count both toward the weekly grains requirement.

For SBP, at least 80% of the weekly grains must be whole-grain rich. If a Program operator substitutes meats/meat alternates for half of the total grains at breakfast, the whole grain-rich requirement only applies to the actual grains offered. For example, if a Program operator offers 5 oz. eq. of grain items and 5 oz. eq. of meats/meat alternates to count as 10 oz. eq. of grains weekly, the whole grain-rich requirement only applies to the actual grains offered (5 oz. eq. of grain items). In this example, a Program operator must offer at least 4 oz. eq. of whole grain-rich grains to meet the whole grain-rich requirement (any remaining grains must be enriched).

In breakfasts for preschoolers, schools must offer at least ½ oz. eq. of grains daily. Up to three times per week, ½ oz. eq. of meats/meat alternates can be substituted for the entire grains component.

For all age/grade groups (preschool-12), meats/meat alternates can be offered daily as an extra item that does not count toward the grain component, provided that the weekly menu stays within the limits for calories, sodium, saturated fat, and *trans* fat.

**56. When using Offer Versus Serve, if a school offers a choice of grains in combination food items daily (e.g., crust for pizza, sandwich roll), must each of these bread items provide the minimum daily grains requirement OR must the minimum 1 oz. eq. be met with one grain item?**

Every reimbursable meal offered must provide the daily minimum quantities specified for all food components. Therefore, if a pizza contains 1 oz. eq. to meet the minimum daily requirement, but a sandwich roll does not, the sandwich meal must contain another grain to meet the minimum daily grains requirement.

**57. Do schools count grains that are less than 0.25 oz. eq. towards the grains range?**

No. Grains offered in amounts less than 0.25 oz. eq. do not count toward daily and weekly grains requirements. All grain products that contain at least 0.25 oz. eq. of grains (including battered and/or breaded products) may count toward the weekly grains requirement.

**58. What guidance exists for understanding the enriched grain requirements?**

Enriched grains are refined grains that have been processed to remove the nutrient-rich bran and germ, and then have thiamin, riboflavin, niacin, folic acid, and iron added after processing. Similarly, a fortified food has certain vitamins and minerals added to increase the nutritional quality. Foods made from refined grains that meet at least one of the following criteria are creditable:

1. The food is labeled as “enriched.” For example, long grain rice that is enriched will have the product name on the label: “enriched long grain rice.”
2. An enriched grain is listed as the first ingredient on the food’s ingredient list or second after water. The ingredient list will usually state “enriched flour” or “enriched wheat flour,” or there may be a sub-listing of nutrients used to enrich the flour, for example, “yellow corn flour {iron, folic acid, riboflavin, niacin, and thiamine}.”
3. For breakfast cereals, the product is labeled as “fortified” or the ingredient list names the vitamins and minerals that have been added to the product. If a breakfast cereal is fortified, it does not need to be enriched. For example, the ingredient list of a fortified breakfast cereal may read, “Ingredients: Wheat flour, sugar, contains 2% or less of salt, baking soda, caramel color, BHT for freshness. Vitamins and Minerals: Vitamin C (sodium ascorbate, ascorbic acid), niacin, vitamin B6 (pyridoxine hydrochloride), reduced iron, zinc oxide, folic acid, vitamin B2 (riboflavin), vitamin B1 (thiamin hydrochloride), vitamin A palmitate, vitamin D, vitamin B12.”

NOTE: The ingredient list of a non-fortified cereal would not name any added vitamins and minerals. For example, the ingredient list of a non-fortified breakfast cereal may read, “Ingredients: rice flour, corn flour, evaporated cane juice, pomegranate juice concentrate, sea salt.” This particular cereal would not be a

creditable grain because it is not made from whole or enriched grains and is not fortified.

The Child Nutrition Labeling Program also includes enriched grain crediting information on new product labels for use by Program operators.

Consistent with existing whole grain-rich guidance for schools, any non-creditable grains in products or recipes used to meet the enriched grain requirements are limited to less than 0.25 oz. eq. For products from Exhibit A, Groups A – G, this means that there must be *fewer* than 4 grams of non-creditable grain per portion. For products from Group H, this means that there must be *fewer* than 7 grams of non-creditable grain per portion.

### **59. How are bran and germ credited?\***

Schools can credit bran and germ as if they are enriched grains: products with bran and germ as the primary grain ingredient can be offered to meet up to 20 percent of the weekly grains requirements. Please refer to the Grains section of the *Food Buying Guide for Child Nutrition Programs* for additional information on creditable grains (<https://foodbuyingguide.fns.usda.gov/FoodComponents/ResourceGrains>).

### **60. What are the grains requirements for the NSLP Afterschool Snack Service?**

The nutrition standards for the NSLP Afterschool Snack Service for grades K-12 continue to use the Grains/Breads component and require amounts in “servings” (rather than ounce equivalents). Program operators have discretion to use ounce equivalents in the NSLP Afterschool Snack Service. Ounce equivalent requirements (16 grams of grains per oz. eq. Exhibit A, Groups A-G) exceed the “servings” requirements (14.75 grams of grains per serving), so grain-based food products manufactured to meet oz. eq. requirements would also meet “servings” requirements.<sup>5</sup>

For information on the serving size requirements, please see *The Food Buying Guide for Child Nutrition Programs*, available at: <https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>. A chart outlining the quantity requirements for NSLP afterschool snacks may be found in the “Resources” section of the guide: [https://foodbuyingguide.fns.usda.gov/Content/TablesFBG/Chart2\\_FBG.pdf](https://foodbuyingguide.fns.usda.gov/Content/TablesFBG/Chart2_FBG.pdf).

Sites serving afterschool snacks to children ages 1 through 4 must follow the afterschool snack requirements for preschoolers found at 7 CFR 210.10(o)(3). A chart outlining the quantity requirements for the CACFP snack meal pattern may also be found in *The Food Buying Guide*: [https://foodbuyingguide.fns.usda.gov/Content/TablesFBG/Chart4C\\_FBG.pdf](https://foodbuyingguide.fns.usda.gov/Content/TablesFBG/Chart4C_FBG.pdf).

### **61. Which ingredients in grain products are non-creditable?**

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<sup>5</sup> Grains in Group H of *The Food Buying Guide for Child Nutrition Programs* (e.g., pasta, rice, cereal grains) must have at least 28 grams of grains per oz. eq. or 25 grams of grains per serving.



Grains that are creditable in School Meal Programs must be whole grain or enriched. Breakfast cereals may also be fortified. Grain ingredients that are not whole or enriched are not creditable, with the exception of bran and germ. Some non-creditable ingredients found in grain products include oat fiber, corn fiber, wheat starch, corn starch, and modified food starch (including potato, legume and other vegetable flours). If whole grain-rich or enriched products include non-creditable ingredients, the non-creditable grains must be less than 2% of the product formula by weight (or less than 0.25 oz. eq.) for the grain product to be creditable at lunch or breakfast. Pasta products made from vegetable and/or legume flours do not credit toward the Grains component, but may credit toward the vegetables component as specified in policy memo SP 26-2019, *Crediting Pasta Products Made of Vegetable Flour in the Child Nutrition Programs*, available at: <https://www.fns.usda.gov/cn/crediting-pasta-products-made-vegetable-flour-child-nutrition-programs>.

If non-creditable ingredients are present at levels of 2% (or 0.25 oz. eq.) or more per portion, the entire grain is non-creditable. During an administrative review, this is a whole grain-rich violation (discretionary fiscal action), rather than a missing meal component (mandatory fiscal action).

If the product is a combination food, the other food components would remain creditable. For example, if a breaded chicken product contains 0.5 oz. eq. of non-creditable grains per portion, the breading is *extra*, and not creditable, but still counts toward the weekly dietary specifications; the chicken may still credit toward the meats/meat alternates component. Commercially-prepared combination foods require a CN label or a product formulation statement to credit toward meal pattern requirements.

This policy is intended to support the whole grain-rich and enriched grain requirements while giving operators in exceptional circumstances the flexibility to continue offering combination food items that are not available with creditable grain ingredients. This information does not apply to Program operators serving children in the Summer Food Service Program or the NSLP Afterschool Snack Service for grades K-12.

**62. What is the best way for schools to ensure they are serving grain products that do not contain more than the allowed amount of non-creditable grains?**

Non-creditable grains are best excluded in the procurement process. For example, schools wishing to purchase items containing 3.99 grams or less of non-creditable grains must explicitly include this requirement in the solicitation documents and accompanying bid specifications to ensure full and open competition and to avoid future material changes to the eventual contract. It is also advisable to include a copy of the Product Formulation Template for Grains so that bidders are aware of the information required to document meal pattern compliance. The template is available at: <https://fns.usda.gov/sites/default/files/resource-files/PFSSsamplegrains.pdf>.

**63. Is there a criterion for identifying grain-based desserts?**

Grain-based desserts are not allowed in the preschool meal pattern.

For grades K-12, up to 2 oz. eq. of grain-based desserts per week are allowed in the NSLP. In Exhibit A found in the *Food Buying Guide for Child Nutrition Programs*, grain-based desserts are designated with a superscript 3 and 4 (available at: <https://foodbuyingguide.fns.usda.gov/ExhibitATool/Index>) There is not a specific amount of sugar and/or fat that classifies a grain food as a dessert. Much is dependent on how the product is used in the meal and how children consume the product. The following items are typically served as desserts: cakes, pies, cookies, and sweet rolls. USDA recognizes that some sugar may be needed to bake breads and other grain items that are not generally served as desserts, but the grain-based desserts limit is intended to minimize children’s exposure to desserts in school meals. Note that crackers and cookies do not have an FDA standard of identity, so manufacturers may come up with creative names (e.g., “round” instead of cookie) that could mislead a menu planner into serving a product that may not be appropriate. Menu planners are encouraged to contact the State agency with any questions.

**64. Are enriched grains allowed as an “extra” in a reimbursable meal, and do the extra enriched grains credit toward the weekly limit of 20% or less enriched grains?\***

Schools may serve non-creditable extras as part of a reimbursable meal. All extra foods must count toward the weekly dietary specifications. If schools choose to serve enriched grains as extras in amounts greater than 0.25 oz. eq. (the minimum creditable amount), these grains must be counted toward the weekly 20% enriched grain limit.

## MILK

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### ALLOWABLE TYPES, MILK SUBSTITUTES, SPECIAL MILK PROGRAM

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#### 65. What types of milk are allowed in the NSLP and SBP?

Schools must offer students a variety (at least two different options) of fluid milk. Schools may offer fat-free (unflavored or flavored) and low-fat (1%) milk (unflavored or flavored) as part of the reimbursable meal for children in grades K-12. If schools offer flavored milk, unflavored milk must also be available at each meal service. Preschool students must be offered only unflavored milk (unless they are served *with* K-12 students, see Q97 & Q98 for additional information). Children age 1 must be offered unflavored, whole milk.

#### 66. May schools offer water in place of milk?

No. Fluid milk is a required component of a reimbursable meal. Program operators must not promote or offer water, juice, or any other beverage as an alternative selection to fluid milk in a reimbursable meal throughout the food service area. Schools must not directly or indirectly restrict the sale or marketing of fluid milk (7 CFR 210.10(d)(4)).

Although water is not a required part of a reimbursable meal, potable water must be available to students at no charge during meals, in the food service area or on the service line, separate from fluid milk (to prevent confusion).

Schools must use signage to help students select a reimbursable meal. See memorandum SP-28-2011 *Revised Child Nutrition Reauthorization 2010: Water Availability During National School Lunch Program Meal Service* (July 12, 2011 (available at: <https://fns.usda.gov/sites/default/files/cn/SP28-2011osr.pdf>) and memorandum SP 39-2019 *Clarification on the Milk and Water Requirements in the School Meal Programs* (September 23, 2019, available at: <https://www.fns.usda.gov/resource/clarification-milk-and-water-requirements-school-meal-program>).

#### 67. May schools offer non-dairy milk substitutes for non-disability reasons?

Yes, schools may provide milk substitutions for non-disability reasons. In a non-disability situation, to provide a non-dairy milk substitution, the following requirements must be met:

- Milk substitutions must meet the regulatory standards outlined in 7 CFR 210.10(d)(3) (available at: [https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-210/subpart-C/section-210.10#p-210.10\(d\)\(3\)](https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-210/subpart-C/section-210.10#p-210.10(d)(3))).<sup>6</sup>
- Schools must obtain a written statement from the student's parent/guardian to support the request. A written statement from a State licensed healthcare provider may also be

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<sup>6</sup> Currently, the vitamin D requirement for fluid milk substitutions is specified in International Units (IUs). The Food and Drug Administration published a final rule that changed the labeling requirements for vitamin D: vitamin D now must be listed in micrograms (mcg) rather than IUs. As a conforming amendment, USDA anticipates updating the vitamin D requirement for fluid milk substitutes from 100 IUs to 2.5 mcg per 8 fl. oz. The amount is unchanged; only the units are different.

- used to support a fluid milk substitution for a non-disability reason, but is not required; a statement from a parent/guardian is sufficient.
- School food authorities (SFAs) must notify the State agency if any of their schools provide milk substitutions for non-disability reasons.

Please note, these requirements apply to milk substitutions for non-disability reasons only. These requirements do not apply to other menu variations for non-disability reasons.

Milk substitutes do not have to be fat-free or low-fat and there are no flavor requirements for fluid milk substitutes.<sup>7</sup> However, schools must include milk substitutes (provided in a non-disability situation) when calculating the overall weekly dietary specifications.

**69. Does the requirement to offer unflavored milk apply to the NSLP afterschool snack service? Is a variety of fluid milk required in this program?**

There is no requirement to offer milk, a variety of milk, or to make unflavored milk available in the NSLP afterschool snack service. If a menu planner opts to offer milk via the NSLP afterschool snack service, they may offer flavored or unflavored milk, or may choose to offer both types of milk.

**70. Are Residential Child Care Institutions (RCCIs) required to offer milk variety daily?**

Yes. However, RCCIs that are a juvenile detention or correctional facility, serve children in different age/grade groups, and have legitimate safety concerns may meet the milk variety requirement over the week rather than daily (if there are safety concerns regarding offering different milk types to students). For example, an RCCI may offer all students flavored, nonfat milk on some days of the week, and unflavored, low-fat milk on other days. For additional guidance, see: SP 48-2013: *Extending Flexibility for RCCIs in the National School Lunch Program*, available at: <https://fns.usda.gov/sites/default/files/cn/SP48-2013os.pdf>.

**71. Can newly emerging forms of milk that are nutritionally equivalent to fresh milk, such as recombined/reconstituted milk dispensed from a machine, be used to meet the fluid milk requirements for school meals?**

Yes, if the milk meets the State and local standards for pasteurized fluid milk. Such milk may be offered as a beverage if it has been dispensed (recombined or reconstituted) with the appropriate amount of water so that it can be labeled as “recombined milk” or “reconstituted milk” and if it meets the requirements at 7 CFR 210.10(d)(1) for types of fluid milk.

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<sup>7</sup> Final rule. *Fluid Milk Substitutions in the School Nutrition Programs* (73 CFR 52903, published September 12, 2008). Available at: <https://www.govinfo.gov/content/pkg/FR-2008-09-12/pdf/E8-21293.pdf>.

SODIUM

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REQUIREMENTS, TIMELINE, IMPLEMENTATION

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**72. What are the sodium requirements?\***

Sodium Target 1 for school lunch and breakfast is effective July 1, 2022, for SY 2022-2023. Implementation of Sodium Interim Target 1A for school lunch will be required starting July 1, 2023, for SY 2023-2024. Sodium Target 1 for school breakfast will remain effective for SY 2023-2024.

For a chart detailing sodium requirements and implementation dates, please see:  
<https://www.fns.usda.gov/resource/school-lunch-and-breakfast-sodium-limits-and-timeline>.

**73. Does the sodium limit apply to each meal offered?**

No. The sodium limit applies to the average meal offered during the school week. It does not apply daily or per-meal. Menu planners may be able to offer a relatively high sodium meal or high sodium food at some point during the week if meals with lower to moderate sodium content are offered the rest of the week.

**74. May a school deviate from the required age/grade group to meet the calorie needs of an older or younger student who receives meals with students from a different age/grade group for developmental or other exceptional reasons?**

The SBP and NSLP aim to provide age-appropriate meals to all students. The meal patterns are designed for specific grades (and the corresponding student ages predominantly present in those grades). Schools are encouraged to offer age-appropriate meals to individual students in unique situations, if operationally feasible (e.g., a 16-year-old teen with developmental issues placed with age/grade group K-5). Schools with unique situations should work with their State agency to best offer age-appropriate meals to all students. A State agency may require the school to seek permission prior to deviating from the calorie ranges for the prevalent age/grade group because the State agency is ultimately responsible for proper oversight of SBP and NSLP requirements.

**75. May a school offer more calories to certain students, such as athletes and pregnant teens, to meet their energy needs?**

The nutrition standards for the reimbursable school meal are based on age-appropriate nutrition and physical activity habits of average students. The weekly calorie ranges apply to the school meal offered on average over the week, and not per student. Schools may offer a variety of meals with different calorie levels to meet the needs of students or allow students to take second servings of some foods (if it fits within the operational budget). Second portions must be included in a nutrient analysis to assess compliance with the weekly dietary specifications. Furthermore, students may purchase additional food a la carte.

**76. Does the *trans* fat limit apply to naturally-occurring *trans* fat in beef, lamb, or dairy products?**

No, the *trans* fat prohibition only applies to added (or synthetic) *trans* fats, which are listed as *partially hydrogenated oil* in the ingredient statement. Naturally-occurring *trans* fat found in products such as beef, lamb, and dairy products made with whole milk are allowed in the School Meal Programs. If there is *trans* fat listed on the Nutrition Facts panel of a product containing meat or dairy, the school should request documentation from the manufacturer that reports the source of *trans* fat.

**77. How can a menu planner meet the *trans* fat requirement with a mixed dish (e.g., beef burrito) that may have both added and naturally-occurring *trans* fat?**

For commercially prepared products, schools must refer to the Nutrition Facts panel or manufacturer's specifications to determine that there are zero grams of *trans* fat per serving. For mixed dishes that may contain both naturally-occurring *trans* fat (e.g., beef) and added/synthetic *trans* fat (partially hydrogenated oil), the only way to determine if the product is compliant is to request information from suppliers on how much of the *trans* fat is naturally occurring versus added (synthetic).

## MEAL PATTERNS

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### RCCIS AND K-12 SCHOOLS, SHORT/LONG SCHOOL WEEKS, YEAR-ROUND SCHOOLS, AGE/GRADE GROUPS, FIELD TRIPS

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#### **78. How are meals served in mixed-grade RCCIs and small K-12 schools?**

If it is not possible to use the established age/grade groups, Program operators have some flexibility. The breakfast meal requirements for grades K-8 and 9-12 overlap, so it is possible to offer the same food quantities to all children (K-12) at breakfast. However, the calorie range that fits all grade groups is quite narrow (450-500 calories), and the planner must meet the sodium limit for the youngest grade group.

At lunch, there is overlap for grades K-5 and 6-8; therefore, a single menu can meet the needs of children in grades K-8. The daily minimum requirements for food components are identical.

For grades 6-8 and 9-12 in a single school, one single menu with the same amounts of food does not meet the nutritional needs of all students. However, the following menu adaptations can help address the dietary needs of both grade groups in a single school.

- Menu adaptation 1: Start with a menu that is appropriate for grades 6-8, and then add in a few additional foods for the older children in grades 9-12. For example, for the fruit and vegetable components, in addition to foods offered to the 6-8 group, schools must offer to the older children:  $\frac{1}{2}$  cup more fruit daily,  $\frac{1}{4}$  cup more vegetables daily and across the week:  $\frac{1}{2}$  cup more red/orange,  $\frac{1}{4}$  cup other,  $\frac{1}{2}$  cup additional (any subgroup) vegetables.
- Menu adaptation 2: Offer both grade groups the full 1 cup of fruit and vegetables required for grades 9-12 (same menu plan for these two food components), if such offerings do not exceed the calorie limit for the 6-8 grade group. Offering a salad bar to all students could permit older students to select additional foods. Alternatively, to meet the additional calorie needs of the 9-12 grade group, consider offering older children an additional ounce equivalent of grains or meats/meat alternates (e.g., additional bread option, larger entrée serving size).

#### **79. How will schools with a shorter or longer school week implement the meal pattern requirements?\***

Schools that regularly serve lunch 6 or 7 days per week must increase the weekly quantity of each required component by 20% ( $\frac{1}{5}$ ) for each additional day. When schools regularly operate less than 5 days per week, they must decrease the weekly quantity by approximately 20% ( $\frac{1}{5}$ ) for each day less than five. Meal pattern requirements for short and long weeks, including vegetable subgroup requirements, can be found at:

<https://www.fns.usda.gov/cn/short-and-long-week-calculations>.

Schools with occasional short weeks (e.g., due to holidays) do not have to adjust menus. However, local Program operators must plan menus consistent with the intent of the meal patterns (e.g., do not regularly fail to offer certain vegetable subgroups, or offer meats/meat alternates and/grains in portions that would cause a menu to exceed weekly dietary specifications).

**80. If preschool and elementary students are in the cafeteria at the same time as older students (i.e., the students are “co-mingled”), may the school serve the preschool children the K-5 meal pattern?**

Yes. Menu planners may offer a single menu, the K-5 meal pattern, to meet the meal requirements for both preschoolers and grades K-5. For both breakfast and lunch, operators serving the K-5 meal pattern will meet the minimum requirements for the current preschool meal patterns. Schools should consult with the State agency for questions about requirements. See SP 37-2017 *Flexibility for Co-Mingled Preschool Meals: Questions and Answers* online at <https://www.fns.usda.gov/cn/flexibility-co-mingled-preschool-meals-questions-and-answers> for additional guidance.

**81. The meal patterns refer to “age/grade groups.” Should menu planners determine which ages apply to each grade group?**

No. The term “age/grade groups” refers to grade groupings. The classification of grade groups K-5, 6-8, and 9-12 is based on nutritional needs of children and the ages that typically correspond with these grade levels (ages 5-10 for grades K-5, ages 11-13 for grades 6-8, and ages 14-18 for grades 9-12). Schools should plan and offer menus based on student grade levels.

**82. Must schools meet the meal pattern requirements for field trips?**

Field trip menus must meet daily meal pattern requirements and count toward weekly meal component and quantity requirements. Students on a field trip may be served slightly different foods that still meet the required components. For example, the cafeteria menu may include sweet potatoes, but the menu planner may offer students on a field trip a different vegetable from the same subgroup (e.g., carrot sticks) or a vegetable from a different subgroup (e.g., celery sticks). The meals from field trips would need to be included when planning meals that meet the weekly requirements, including the vegetable subgroups and the dietary specifications (calories, saturated fat, and sodium).

**83. Can the calorie limits be waived for RCCI students who participate in physically demanding activities all day?**

Schools or RCCIs are NOT able to waive the calorie (or any other meal pattern) requirements. We understand that RCCIs engaging in high levels of physical activity are particularly challenged; however, USDA is unable to make exceptions to the nutrition standards for any entity.



Calorie ranges apply on average to the entire school over the week. There are no requirements for individual student intake; therefore, any given student may select fewer calories (such as in an OVS situation with only 3 components) or, if allowed by the school, select more food on his/her tray or several higher calorie foods that, in combination, exceed the calorie limits. Additional food may be offered to students through the NSLP afterschool snack program.

## MENU PLANNING

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### WEEKEND MEAL SERVICE, FAMILY STYLE SERVICE, VENDED MEALS, EXTRA FOODS, SECOND SERVINGS, LEFTOVERS

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**84. If an RCCI claims meals on weekends only and occasionally on weekdays (when a student does not go to school), must the RCCI follow a 7-day meal pattern or a 2-day meal pattern?**

For weekend meals, the RCCI has options for following the daily and weekly meal pattern requirements. The operator may add three weekends together to create a 6-day school week and follow the Short and Long Week Calculation meal chart found at <https://www.fns.usda.gov/cn/short-and-long-week-calculations>. Only the “additional vegetables” category is adjusted for long weeks, and no adjustment to any of the dietary specifications is required since they are weekly averages (the average is calculated the same, whether it is a school week of 6 or 7 days). For a sporadic meal offered during the week, only the daily meal pattern requirements would apply. The sporadic meals would not be included in a nutrient analysis, if conducted during an administrative review.

**85. How are calorie and quantity requirements handled for family-style meal service?**

Family-style meal service is allowed in RCCIs and schools serving all grades. Local Program operators must plan and offer at least the minimum required food quantities for each child participating in the meal service. Students must select the required components for a reimbursable meal, including at least ½ cup of fruits or vegetables. Meals offered must also meet the food component and dietary specification requirements.

**86. Do reimbursable meals that are offered pre-packaged or in vending machines have to meet all the vegetable subgroup requirements?**

Yes. All meals, including those that are pre-packaged and/or offered through vending machines, must be planned over a week to meet the daily and weekly meal pattern requirements, including the vegetable subgroups. If a vending machine allows a child to choose one sandwich and provides a selection of all vegetable subgroups over the week, this type of meal would meet the weekly vegetable requirement.

**87. May a school offer second servings of a food item by allowing students who have purchased their reimbursable meal to go back to the serving line for more food (food is not claimed, just given)?**

Yes. If a school chooses to offer second servings of any part of the reimbursable meal without any additional charge, these foods must count toward the weekly dietary specifications. If second helpings or second meals are sold a la carte, they do not count toward meal pattern requirements, and are subject to competitive foods standards (7 CFR 210.11) and non-program foods requirements (7 CFR 210.14(f)).

**88. May a school offer extra foods that do not credit as part of a reimbursable meal (e.g., pudding, ice cream) after the point of service (POS)?**

Yes. Any extra or promotional food, such as dessert items, offered free of charge to students who purchase a reimbursable meal must be included in the nutrient analysis and count toward the weekly calories, saturated fat, sodium, and *trans* fat. Extra foods may diminish kids' appetites for foods in the reimbursable meal and can contribute to food waste.

**89. How are leftovers accounted for in the meal pattern requirements and dietary specifications?**

Occasional, small quantities of leftover food offered on another day are not counted toward the meal components, including the vegetable subgroups. The State agency has discretion to determine whether such leftovers are of a reasonable amount and are not occurring on a regular basis. Schools also may freeze leftovers and serve them first on the serving line, following standard Hazard Analysis Critical Control Point protocols, the next time that particular item reappears in the menu cycle.

Leftovers served to students on the same day as they are initially offered are considered seconds. If leftovers (such as chef salads) are being offered to students on the serving line on another day as part of the reimbursable meal, they must be included in weighted nutrient analyses and are subject to the weekly dietary specifications. If a school consistently has leftovers, menu planners may consider participation trends in an effort to provide one reimbursable lunch for each child every day.

**90. May a school charge for additional servings of food components?**

Yes, it is at the school's discretion to charge for additional servings of food components. If a school charges for second servings, they are considered a la carte foods and are not included in the nutrient analysis for the reimbursable school meal. Schools must identify the number of servings that students may take as part of the reimbursable meal. These additional foods are subject to competitive foods standards in 7 CFR 210.11. If a school decides to serve some meal components free of charge, they must ensure they are in compliance with the non-program food requirements outlined in SP 20-2016, *Nonprofit School Food Service Account Non-program Food Revenue Requirements* (published December 23, 2015), available at: <https://fns.usda.gov/sites/default/files/resource-files/SP20-2016.pdf>.

**91. May a school offer free, extra food or beverages to children who have a reimbursable meal?**

Yes. Additional foods or beverages may be offered at no charge to children who have a reimbursable meal; however, extra foods must count toward the dietary specifications (calories, sodium, saturated fat, and *trans* fat). The menu planner must be cautious not to exceed the maximum limits for calories, saturated fat, and sodium by offering extra food.

Full-strength juice offered after the POS counts toward the weekly juice limit established for the reimbursable meal (no more than half of the total fruit or vegetable offerings over the week may be in the form of juice). Therefore, offering juice after the POS would limit the opportunity to include juice as part of a reimbursable school meal. It could also discourage students' consumption of fluid milk, which must be offered with the meal. Additionally, schools are reminded that potable water must be made available at no charge to students in the place where lunch meals are served during the meal service. While water must be made available, schools must not directly or indirectly restrict the sale or marketing of fluid milk (7 CFR 210.10(d)(4)). Furthermore, commercially packaged water should not be made available on the serving line in any manner that interferes with, or appears to be a substitute for, the selection of reimbursable meal components, including low-fat or fat-free milk.

Schools must use signage to help students select a reimbursable meal. See memorandum SP 28-2011 *Revised Child Nutrition Reauthorization 2010: Water Availability During National School Lunch Program Meal Service* (July 12, 2011, available at: <https://www.fns.usda.gov/water-availability-during-nslp-meal-service>) and memorandum SP 39-2019 *Clarification on the Milk and Water Requirements in the School Meal Programs* (September 23, 2019, available at: <https://www.fns.usda.gov/resource/clarification-milk-and-water-requirements-school-meal-program>).

## **92. How does fruit in desserts credit toward the lunch meal pattern?**

The fruit in desserts can credit toward the fruits component. The minimum creditable serving size is  $\frac{1}{8}$  cup. For grain-based desserts with fruit (such as pies, cobblers, or fruit cookies, only the grains portion (e.g., crust) counts toward the grain-based dessert limit (2 oz. eq. per week).

Grain-based desserts are not allowed in preschool meals; therefore, the grains portion (e.g., crust) cannot count toward the grains component of reimbursable meals for preschoolers.

## **93. Must children eligible for free meals purchase milk a la carte when they bring lunch from home and only want milk from school?**

Yes, free and reduced-price benefits only apply to unitized, reimbursable meals. However, schools may choose to offer children who are certified as eligible for free meals milk a la carte at no charge, or at a price lower than the cost; this is an allowable use of school food service account funds. However, because milk offered outside of reimbursable meals is a non-program food, the school must generate adequate revenue from other non-program foods to offset the loss from milk so that the total revenue meets the requirements in 7 CFR 210.14(f) regarding the sale of non-program foods. For additional information, see SP 20-2016, *Nonprofit School Food Service Account Non-program Food Revenue Requirements* (published December 23, 2015), available at: <https://fns.usda.gov/sites/default/files/resource-files/SP20-2016.pdf>.

**94. For menu planning purposes, when multiple choice menus or multiple age/grade groups are served, how are minimums calculated?**

The NSLP meal pattern establishes daily minimum requirements for fruits, vegetables, grains, meats/meat alternates, and milk (5 required components). The SBP meal pattern sets daily minimum requirements for fruits, grains, and milk (3 required components). In addition, the meal patterns also include weekly maximum levels that serve as a guide for menu planners to offer age-appropriate meals. However, when monitoring compliance with the grains and meats/meat alternates requirements, the State agency evaluates compliance with the daily and weekly minimum requirements only.

**Example 1 - Daily Minimum**

In grades 9-12, the minimum daily grain requirement for lunch is 2 oz. eq. So, if a student is offered a choice between pizza with 2 oz. eq. of grain OR a stir fry with a 1 oz. eq. of grains, only one of those offerings meets the 2 ounce minimum. The student would need to have another ounce equivalent of grains offered with the stir fry, such as a side item, to meet the daily grains minimum.

**Example 2 - Weekly Minimum**

If a grade K-5 school offers a 1 oz. eq. grain item (salad with croutons) and a 3 oz. eq. grain item (pizza) every day (and instructs the student to select one option only), the minimum weekly offering is 5 oz. eq. grain (1 oz. eq. x 5 days). This menu would not meet the required weekly minimum for lunch of 8 oz. eq. Students must be offered an additional grain item (1 oz. eq.) with the salad on at least three days to meet the weekly minimum.

**Example 3 – Weekly Minimum with Multiple Age/Grade Groups**

For grades K-5 and 6-8, the daily grains minimum for lunch is only 1 oz. eq. and the weekly grains minimum is 8 oz. eq. Offering the minimum of only 1 oz. eq. daily would only total 5 oz. eq. across the week. So, on some days, schools must offer **more** than 1 oz. eq. of grains as a **minimum** offering. The same logic applies to the weekly minimum amount of meats/meat alternates.

AGE/GRADE GROUPS  
MENU ADJUSTMENT, K-8 MENU

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**95. The regulations establish age/grade groups for the NSLP and SBP. Does this mean that schools must offer different meal patterns to different grade levels?**

Yes. Regulations establish five age/grade groups: two preschool age/grade groups (ages 1-2 years and 3-5 years) and three age/grade groups for K-12 students (grades K-5, 6-8, and 9-12). The school meal patterns for each age/grade group are intended to result in age-appropriate and nutritious meals that promote healthy weight. In individual cases where a school district has an unusual grade configuration that prevents the use of the required age/grade groups, the same lunch may be served to children in grades K-5 and 6-8, as the requirements overlap. There is also overlap in the breakfast meal pattern requirements; therefore, the same breakfast may be offered to all grade levels, provided that the sodium and calorie specifications for each age/grade group are met on average over the school week.

**96. What age/grade groups must a K-8 school use for menu planning?**

If it is not operationally feasible to offer two meal patterns (K-5 and 6-8), a menu planner may offer students in grades K-8 the same quantities of food because the lunch meal pattern quantities for the K-5 and 6-8 age/grade groups overlap. For example, a school could offer 8-9 oz. eq. of grains and 9-10 oz. eq. of meats/meat alternates to all students to meet the requirements established for groups K-5 and 6-8. On average, weekly meals offered to K-8 students must be 600-650 calories to meet calorie requirements for both groups. The sodium content of meals offered to K-8 students must meet the sodium specification for the youngest group: K-5.

**97. What are suggestions for menu planning overlapping age/grade groups?**

Menu planners may offer similar menus to children in age/grade groups 6-8 and 9-12. The breakfast food portions for all age/grade groups overlap, so a menu planner may offer the same food quantities to all children in SBP provided that the meal meets the requirements of each grade group. There is some overlap between the grade groups in lunch; however, there are calorie differences between the 6-8 and 9-12 grade groups.

One of the most straightforward ways to ease lunch menu planning for grades 6-8 and 9-12 within one school is to start with the components that overlap and make minor adjustments to the vegetables or fruits components to increase calories for students in grades 9-12. Schools must post signage at or near the beginning of the serving line to assist students in selecting appropriate quantities. For instance, a sign may read, “8th graders: 1 fruit choice, 9th graders: 2 fruit choices.”

Another option is to vary the grain or meats/meat alternates components (e.g., older students take a second piece of bread or cheese). This strategy relies more heavily on student education and signage but provides more flexibility for menu planners seeking to offer more or less than 2 oz. eq. of grains or meats/meat alternates daily.

**98. Are schools allowed to follow the K-5 meal pattern when preschoolers are not co-mingled with K-5 students?**

When preschoolers are served meals in a different area or at a different time than K-5 students, schools must follow the preschool meal pattern as outlined in parts 7 CFR 210.10(o)(3), 210.10(p), and 220.8(o). The option to serve the K-5 meal pattern to preschoolers is only allowed when preschoolers are co-mingled with K-5 students during meal service.

**99. May schools that operate the CACFP and serve meals to children 5 years old and older choose to follow the National School Lunch Program (NSLP) and School Breakfast Program (SBP) meal pattern requirements?**

Yes. Schools that serve meals to children 5 years old and older through the CACFP may choose to follow the NSLP and SBP meal pattern requirements instead of the CACFP meal pattern requirements (7 CFR 226.20(i)). For example, if a school operates the CACFP at-risk afterschool program, it may choose to follow the CACFP or the NSLP meal pattern requirements.

## CREDITING

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### STANDARDIZED CLAIMS, CREDITABLE AMOUNTS, CN LABEL, FRUIT AND VEGETABLE CREDITING

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#### 100. What are the minimum volume and weight requirements for meal components?

- Meats/meat alternates (M/MA): 0.25 oz. eq.
- Grains: 0.25 oz. eq.
- Fruits: 1/8 cup
- Vegetables: 1/8 cup
- Fluid Milk:
  - 8 fl. oz. (grades K-12)
  - 6 fl. oz. (preschool, ages 3-5)
  - 4 fl. oz. (preschool, ages 1-2)

#### 101. How do schools credit soups like pumpkin, butternut squash, or tomato soup?

Soups like butternut squash, pumpkin, and tomato may contribute toward the Red/Orange vegetable subgroup. To credit, the recipe is needed to determine the creditable amount of butternut squash, pumpkin, or tomato per serving. If this is a commercial item, a product formulation statement may be used to determine creditable amounts.

#### 102. How are pureed fruits and vegetables credited?

Fruit or vegetable puree credits based on the actual volume served. For many fruits and vegetables, the pureed form has a smaller volume than whole fruit pieces. Some puree yields for fruit and vegetables are listed in the Food Buying Guide (e.g., blackberries, plums, raspberries, tomatoes). For other foods, schools must rely on manufacturer information or, for in-house recipes, yields based on volume of fruit/vegetable puree. Please refer to the introduction of *Food Buying Guide for Child Nutrition Programs* (available at: <https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>.) for information about how to obtain in-house yield data.

#### 103. Do peanuts and peanut butter count as legumes?

No. In accordance with existing regulations and the Dietary Guidelines for Americans, peanuts and peanut butter are meat alternates and do not credit as a legume vegetable. Peanuts and peanut butter are listed in the Meats/Meat Alternates section of the Food Buying Guide. Nuts and seeds, including peanuts, may credit for up to half of the meats/meat alternates component (7 CFR 210.10(c)(2)(i)). Two tablespoons of peanut butter credits as 1 oz. eq. of meat alternate.



**104. May unrecognizable food ingredients contribute to meal pattern requirements (for example, carrots pureed in a sauce for Macaroni and Cheese)?**

Yes, pureed foods such as fruits or vegetables may contribute to meal pattern requirements, provided that the dish that contains them also provides an adequate amount of recognizable, creditable fruits or vegetables ( $\frac{1}{8}$  cup is the minimum recognizable amount).

For example, a menu offers macaroni and cheese made with butternut squash cubes and carrot puree. If the macaroni and cheese contains the minimum recognizable amount of vegetables (e.g.,  $\frac{1}{8}$  cup of diced squash), the volume of unrecognizable vegetables (e.g.,  $\frac{1}{8}$  cup of pureed carrots) may also credit. In this example, the dish would provide a total of  $\frac{1}{4}$  cup red/orange vegetables. This is the same concept that has historically allowed soy flour (Alternate Protein Product) in a pizza crust to contribute as a meat alternate; there is a recognizable amount of meat/meat alternate (e.g., cheese) included in pizza as topping and students can recognize that pizza is a source of meat/meat alternate.

In the example above, both the recognizable and unrecognizable vegetables are from the same vegetable subgroup (red/orange). This is encouraged for nutrition education but not required: the vegetables could be from different subgroups and credit accordingly. However, if the dish does not contain at least  $\frac{1}{8}$  cup of a recognizable component (in the above examples, vegetables), then the blended foods do not contribute to the meal requirements. The School Meal Programs provide more than calories: particularly in school settings, the Programs are uniquely positioned to help children learn to build well-balanced meals and gauge appropriate portion sizes.

While FNS encourages recognizable forms of foods for nutrition education purposes, smoothies and pasta products made from vegetable flours may credit in the Child Nutrition Programs. Smoothies are an increasingly common food item in the Child Nutrition Programs. Updated smoothie guidance is found in SP 40-2019, CACFP 17-2019, SFSP 17-2019 *Smoothies Offered in Child Nutrition Programs* (September 23, 2019, available at: <https://www.fns.usda.gov/resource/smoothies-offered-child-nutrition-programs>). Pasta products made of vegetable flours may credit as legumes, and are an innovative way to offer vegetables in a food item that is popular with children. For additional information, see Policy memo SP 26-2019, CACFP 13-2019, SFSP 12-2019 *Crediting Pasta Products Made of Vegetable Flour in the Child Nutrition Programs* (<https://www.fns.usda.gov/cn/crediting-pasta-products-made-vegetable-flour-child-nutrition-programs>).

**105. May pureed beans added to a brownie recipe be credited toward the vegetables or meats/meat alternates component?**

No. Beans can be added to enhance the nutritional profile of the brownie, but they cannot credit toward meal pattern requirements because brownies are a dessert and do not serve as the meats/meat alternates component in a reimbursable meal. Improving the nutrient content of the foods children eat by disguising nutrient-rich vegetables and fruits in the food can be beneficial. However, disguising vegetables in other foods does not teach and encourage children to recognize, eat, and enjoy a variety of healthy fruits and vegetables.

**106. Do leafy greens that are served cooked (such as collard greens) count as half the volume served? What about if they are pureed?**

No. Cooked or pureed, leafy greens credit as volume served. Only leafy greens that are served raw (not pureed) credit as half the volume served.

**107. Do herbs, such as cilantro, count as half the volume served?**

Yes. Cilantro and parsley are both classified as dark green, leafy vegetables; therefore, ¼ cup would credit as ⅛ cup of dark green vegetables. Herbs in the Other subgroup, such as chives and garlic, credit as volume as served. Schools with questions about the subgroup classification of additional herbs not listed above should contact their State agency for assistance. Herbs that are used in small amounts (less than ⅛ cup per portion) as a garnish or seasoning do not credit toward the vegetables component.

**108. Can CN Labels copied with a watermark submitted by the manufacturer be used to document Federal meal requirements?**

The CN Label from the actual product carton is proof of purchase and should be used to document meal requirements. However, State agencies can require the recipient of the CN Labeled product to document on the bill of lading that the product was received with the CN Label. The recipient should check the CN Labeling website, at <https://www.fns.usda.gov/cnlabeling/usdausdc-authorized-labels-and-manufacturers>, to verify that the CN identification number is valid, and to document on the bill of lading that the product was received with a valid CN identification number and list the valid identification number. In this case, the copied label from the manufacturer with the required watermark can be used as documentation for menu planning purposes. Please see SP 11-2015(v2) for details at: [http://www.fns.usda.gov/sites/default/files/cn/SP11v2\\_CACFP10\\_SFSP13-2015os.pdf](http://www.fns.usda.gov/sites/default/files/cn/SP11v2_CACFP10_SFSP13-2015os.pdf).

## RESOURCES

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### **Administrative Review Manual & Forms**

This Manual, in tandem with related forms, describe the process by which State agencies conduct comprehensive evaluations of school food authorities (SFAs) participating in the NSLP and SBP. The Manual and Forms are available to State agencies on USDA's PartnerWeb.

### **Child Nutrition Sharing Site (CNSS)**

The Healthy Meals Resource System (HMRS) has moved to the Institute of Child Nutrition (ICN) and is now the Child Nutrition Sharing Site (CNSS). CNSS is an online information center providing Child Nutrition Programs (CNP) with a means for sharing effective resources related to program operation. CNSS aids in the collection and sharing of state and local resources by providing a centralized place to store, organize, manage, and share knowledge and tools with your peers.

This collaboration between ICN and United States Department of Agriculture, Food and Nutrition Service (USDA/FNS) gives child nutrition professionals access to resources that comply with current Federal regulations, policies, and guidance. The site is currently under construction. See <https://theicn.org/>

### **Contracting with Food Service Management Companies**

This memo and attachments refer to guidance for State agencies and SFAs contracting with food service management companies (FSMCs). The guidance for State agencies includes information on appropriate procurement methods, considerations when using prototype solicitations, the process of evaluating and scoring criteria for contract award, and monitoring responsibilities. The guidance also includes contract amendments to be avoided, unacceptable contract provisions, and how to address conflicting contract terms. See <https://www.fns.usda.gov/updated-guidance-contracting-food-service-management>.

### **Food Buying Guide for Child Nutrition Programs**

The Food Buying Guide for Child Nutrition Programs has current information to help Program operators and purchasing agents (1) buy the right amount of food and the appropriate type of food for your Program(s), and (2) determine the specific contribution each food makes toward the meal pattern requirements. The interactive Food Buying Guide (available online and as an app) allows users to easily search, navigate, and display content. Users can also compare yield information, create a favorite foods list, and access tools, such as the Recipe Analysis Workbook (RAW) and the Product Formulation Statement Workbook. See <https://foodbuyingguide.fns.usda.gov/>.

### **Item Clusters, Percent of Consumption, and Representative Foods for 2010 USDA Food Patterns**

This resource is helpful for food classification.

[https://fns.usda.gov/sites/default/files/usda\\_food\\_patterns/ItemClustersAndRepFoods.pdf](https://fns.usda.gov/sites/default/files/usda_food_patterns/ItemClustersAndRepFoods.pdf)

### **Menu Planner for School Meals**

The Menu Planner for School Meals is a comprehensive guide for local school nutrition professionals to assist them with developing healthy, safe, affordable, and appealing school meals and snacks that meet the meal pattern requirements. See <https://www.fns.usda.gov/tn/menu-planner>.

### **Offer Versus Serve Guidance**

Offer Versus Serve (OVS) is a provision in the NSLP and SBP that allows students to decline some of the food offered. The goals of OVS are to reduce food waste in the School Meal Programs by permitting students to decline foods they do not intend to eat. This guidance is intended to clarify the requirements of OVS, specifically related to what students must take in order to have a reimbursable meal. See <https://www.fns.usda.gov/updated-offer-vs-serve-guidance-nslp-and-sbp-beginning-sy2015-16>.

### **Procurement Requirements for the National School Lunch, School Breakfast and Special Milk Programs**

Regulations governing procedures related to the procurement of goods and services in the National School Lunch Program, School Breakfast Program, and Special Milk Program. These regulations are intended to promote full and open competition in SFA procurements, clarify State agency responsibilities, and ensure that only allowable contract costs are paid with nonprofit school food service account funds. See <https://www.fns.usda.gov/school-meals/fr-103107>.

### **Procuring Local Foods**

These online resources help ensure Program operators have the knowledge necessary to incorporate local foods into their menus. See <https://www.fns.usda.gov/cfs/procuring-local-foods>.

### **Team Nutrition**

Team Nutrition is an initiative of the USDA Food and Nutrition Service to support the child nutrition programs through training and technical assistance for foodservice, nutrition education for children and their caregivers, and school and community support for healthy eating and physical activity. Resources and additional information is available at: <https://www.fns.usda.gov/tn>.

### **USDA Foods Toolkit**

The USDA Foods Toolkit is a collection of valuable resources to assist Child Nutrition Professionals in effectively using their USDA Food entitlement and to help them educate students, staff, and the community about the healthy contributions that USDA Foods provide to their meal programs. See <https://www.fns.usda.gov/fdd/usda-foods-toolkit-child-nutrition-programs>.

### **USDA Standardized Recipes**

These recipes provide Child Nutrition Program operators with delicious kid-tested dishes that meet meal pattern requirements. These recipes are standardized to provide updated crediting information, including the vegetable subgroups. They also include recipes made with legumes, whole grains, and/or dark green, red, and/or orange vegetables. See <https://www.fns.usda.gov/usda-standardized-recipe>.