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SUBJECT: Questions & Answers on the Final Rule, "Nutrition Standards in the National School Lunch and School Breakfast Programs"

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

Attached are Questions & Answers (QAs) on the meal requirements for the National School Lunch Program (NSLP) and School Breakfast Program (SBP). Several QAs have been updated to reflect the meal pattern flexibilities announced by the Food and Nutrition Service over the past school year, the requirements that were phased-in on July 1, 2014, for School Year 2014-2015, and the new technical assistance resources available to schools. Two new QAs have been added. The list of the updated and new QAs is provided below. Minor changes throughout the document include the removal of outdated references and citations, removal of duplicate questions, grouping of similar questions, and miscellaneous editorial changes for content clarification.

Updated QAs:

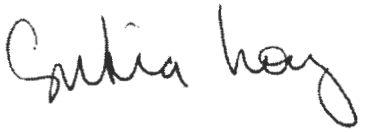
Fruits and Vegetables: QAs 1, 3, 4, 12, 13, 16, 18, 20, 24, 38, 42, 44
Meat and Meat Alternate: QA 8
Grains: QAs 1, 2, 4, 5, 6, 7, 11, 12, 14, 15, 17, 18, 23, 27, 28, 29
Sodium: QAs, 1, 2, 3
Calories: QA 2
Meal Patterns: QAs 1, 8
Menu Planning: QAs 16, 17
Multiple Offerings: QAs 1, 2
Offer versus Serve: QAs 1, 8
USDA Foods: QAs 1, 2, 3, 4
Age/Grade Groups: QA 1
Implementation Assistance: QA 1
Monitoring: QAs 2, 3, 4
Nutrient Analysis: QAs 3, 4
Software Requirements: QA 3
Technical Assistance Resources: QA 1
Crediting: QA 9
Other Child Nutrition Programs: QAs 1, 2

New QAs:

Sodium: QA 3
Menu Planning: QA 17

This guidance addresses the final rule overall, and includes questions on general and specific aspects of the new meal requirements. This document is updated periodically to include QAs submitted by Program operators, provide new guidance, or to clarify existing responses. The QAs and related materials are available on a special webpage on the FNS website: http://www.fns.usda.gov/cnd/Governance/Legislation/nutritionstandards.htm. A comprehensive list of additional resources for school foodservice operators is available at http://www.fns.usda.gov/healthierschoolday/school-day-just-got-healthier-toolkit.

We appreciate all you do for the School Meal Programs and look forward to continue working with you to improve the nutrition of America's children. State agencies are reminded to distribute this memo and attachment to program operators immediately. School Food Authorities should contact their State agencies for additional information. State agencies may direct any questions concerning this guidance to the appropriate Food and Nutrition Service Regional Office.



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Attachment

Final Rule
"Nutrition Standards in the National School Lunch and School Breakfast Programs"

QUESTIONS & ANSWERS FOR PROGRAM OPERATORS

Revised August 2014

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GENERAL

PURPOSE, DIFFERENCES FROM PREVIOUS AND PROPOSED MEAL PATTERNS, TIMELINE, CHILDREN WITH DISABILITIES

1. **Why is USDA setting new meal patterns and dietary specifications for school meals?**
On December 13, 2010, President Obama signed into law Public Law 111-296, the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). This historic legislation marked the most comprehensive changes to the school nutrition environment in more than a generation. The last update to school meals standards was over 15 years ago. Since that time, tremendous advancements in our understanding of human nutrition have occurred. In response to that reality, the HHFKA required The Department of Agriculture (USDA) to update school meal nutrition standards to reflect the most current dietary science.

   The timing of this legislation and USDA's standards are critically needed to help combat the epidemic of childhood obesity as well as the urgent problem of childhood hunger. Nearly one in three children are at risk for preventable diseases like diabetes and heart disease due to overweight and obesity. If left unaddressed, health experts tell us that our current generation of children may well have a shorter lifespan than their parents.

2. **What are the main differences between the proposed and final rules?**
The final rule (77 FR 4088) makes significant improvements to school meals, while modifying several key proposed requirements to address public comments regarding cost, timing/implementation, food waste, and administrative burden. The final rule, in comparison to the proposed rule:
   - Phases-in changes to the breakfast program gradually over a three-year period
   - Does not require a meat/meat alternate at breakfast daily
   - Does not restrict starchy vegetables, and establishes weekly minimums for all vegetable subgroups
   - Reduces the required weekly grains amounts at lunch
   - Allows students to take smaller portions of the fruits and vegetables components (at least ½ cup of either) under Offer Versus Serve (OVS)
   - Provides an additional year for the implementation of the second sodium target
   - Requires State agencies to assess compliance with the new meal requirements based on the review of one week of menus (instead of two weeks as proposed)
   - Allows schools to continue the current tomato paste crediting practice of crediting by whole food equivalency

3. **How are the new meal patterns and dietary specifications different from previous requirements?**
The key changes to the meals for children in grades K and above are as follows. Exceptions to the meal requirements are noted in the subject-specific Q&As.

National School Lunch Program (NSLP)
- A daily serving of fruits
- A daily serving of vegetables plus a weekly requirement for dark green, red/orange, beans/pea (legumes), starchy, and "other" vegetables; increased quantity of combined fruits and vegetables
- Daily and weekly minimum requirements for meat/meat alternates

School Breakfast Program (SBP)
- Meat/meat alternate may be offered after daily minimum grains requirement is met
- 1 cup of fruit is required at breakfast effective School Year (SY) 2014-2015
- Breakfast is included in administrative reviews

NSLP and SBP
- One food-based menu planning approach and same age/grade groups
- Fruits and vegetables are two separate food components
- Daily fruits requirement
- Under OVS, students must select at least ½ cup of the fruits or the vegetables component as part of the reimbursable meal
- Daily and weekly minimum requirements for grains
- All grains offered must be whole grain-rich effective SY 2014-2015
- Fat-free (unflavored or flavored) and unflavored low-fat milk only
- Calorie minimum and maximum levels
- Intermediate (Target 1 and Target 2) and final sodium reductions
- Trans fat limit
- Limit on saturated fat only (not on total fat)
- 3-year administrative review cycle

4. **When were the changes introduced?**
The new lunch meal pattern became effective July 1, 2012, the beginning of SY 2012-2013. With the exception of the new milk requirement, changes to the breakfast program were phased-in beginning July 1, 2013 (SY 2013-2014). See the implementation chart in the FNS website: http://www.fns.usda.gov/cnd/Governance/Legislation/nutritionstandards.htm

5. **Does this rule impact the meals for children with disabilities?**
The meals for children with recognized medical disabilities that restrict their diet are not affected by the new meal patterns and dietary specifications and continue to be based on a medical statement from a licensed physician. If a licensed doctor states that a child has a food related disability (such as a milk allergy) that is recognized under the Americans with Disabilities Act, then the meal the doctor recommends is reimbursable.

For information on optional accommodations for children with special dietary needs (without recognized medical disabilities), please refer to *Accommodating Children with Special Dietary Needs in the School Nutrition Programs,* http://www.fns.usda.gov/sites/default/files/special_dietary_needs.pdf.

6. **Do the new meal requirements apply to meals served to Pre-K children in schools?**
   No; School Food Authority's are not required to apply the new meal requirements to Pre-K meals. The meal pattern for Pre-K students will be updated through a future rule updating the CACFP meal patterns to ensure that meal requirements for preschoolers are the same across the Child Nutrition Programs. Until then, schools serving Pre-K children can continue to use existing meal patterns for this age group in 7 CFR 210.10(p) and 7 CFR 220.8(o). However, those who wish to serve the pre-K students using the new meal pattern (K-5) may do so.

FRUITS AND VEGETABLES

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

1. **What forms of fruits are required?**
   Schools may offer fruits that are fresh; frozen; canned in light syrup, water or fruit juice; or dried. Pasteurized, full-strength (100%) fruit juice may also be offered in either liquid or frozen form (it is credited to meet no more than one-half of the fruits component offered over the week). Required quantities are established in the meal patterns for lunch and breakfast.

2. **What types of vegetables are required?**
   Over the course of the week, schools must offer all vegetable subgroups established in the 2010 Dietary Guidelines for Americans: dark green, red/orange, dry beans/peas (legumes), starchy, and "other" vegetables (as defined in the Dietary Guidelines). Required minimum weekly quantities for each subgroup are established in the lunch meal pattern. Pasteurized, full-strength vegetable juice is also allowable (it is credited to meet no more than one-half of the vegetables component). Vegetables are an option for breakfast.

3. **Where are the required vegetable subgroups identified?**
   Section 210.10(c) (2) (iii) of the regulations identifies the required vegetable subgroups. The Food Buying Guide for School Meal Programs identifies each vegetable by subgroup (http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs). Note that the term "other vegetables" refers to a specific vegetable subgroup that is listed in the 2010 Dietary Guidelines for Americans, as well as online under http://www.ChooseMyPlate.gov.

4. **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. The Offer versus Serve (OVS) policy - allows students to take smaller portions of the fruits and vegetables components, if desired. Under OVS, students must select only ½ cup daily of the fruits or the vegetables components as part of the reimbursable lunch or breakfast, even if larger portions are offered. Other strategies to reduce plate waste include: tasting tests before introducing foods on the menu, creative marketing/presentation of foods, and self-service salad bars. For additional tips, see:
   - *Fruits and Vegetables Galore: Helping Kids Eat More* (http://teamnutrition.usda.gov/Resources/fv_galore.html)
   - *Kid-Friendly Veggies and Fruits* (http://www.choosemyplate.gov/food-groups/downloads/TenTips/DGTipsheet11KidFriendlyVeggiesAndFruits.pdf)
   - *Smarter Lunchrooms* strategies (http://smarterlunchrooms.org/resources)

5. **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.

6. **Is a school that offers vegetables in place of fruits at breakfast required to offer the vegetable subgroups in any particular sequence to ensure that the first 2 cups of any such substitution are from the vegetable subgroups that are under-consumed?**
   The School Breakfast Program (SBP) does not have a total vegetable or a weekly vegetable subgroups requirement. If a school chooses to offer vegetables in place of fruits, it must plan how and when to offer them. Provided at least 2 cups of the red/orange, dark green, legumes, or "other" vegetable subgroups are offered over the course of the week, it does not matter what day of the week the starchy vegetables are included in the menu.

7. **At breakfast, must the student select only one fruit or may the student select a combination of fruit choices to meet the required fruit component for the reimbursable meal?**
   Students may select a single fruit type or a combination of fruits to meet the required fruit component. Under OVS, however, the student must select at least ½ cup of any fruit or combination of fruits to have a reimbursable meal.

8. **What is the minimum amount of a fruit or vegetable that can be credited toward the meal pattern?**
   To meet the fruit and the vegetable components, the minimum creditable serving size is ⅛ cup. For clarification, this creditable serving size is different from the ½ cup of fruits or vegetables required for a reimbursable meal selected by a student under OVS.

9. **Can vegetable juice blends contribute toward a vegetable subgroup?**
   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 contribute to the "additional" vegetable subgroup. 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" vegetable subgroup.

10. **How do leafy salad greens credit toward meal pattern requirements?**
    Raw and cooked greens credit differently. Raw, leafy salad greens credit at half the volume served, which is consistent with the Dietary Guidelines for Americans. For example, a ½ cup of romaine lettuce contributes ¼ cup toward the "dark green" vegetable subgroup. Cooked leafy greens such as sautéed spinach are credited by volume as served; for example, ½ cup of cooked spinach credits as ½ cup of dark green vegetables.

11. **How does dried fruit credit toward the meal pattern requirements?**
Whole dried fruit and whole dried fruit pieces credit at twice the volume served. For example, a ¼ cup of raisins contributes ½ cup fruit toward the fruit requirement, as recommended by the Dietary Guidelines for Americans.

12. **Do 100% fruit strips, fruit drops or other snack-type fruit or vegetable products contribute toward meal pattern requirements?**
No; only fresh, frozen or canned fruits and vegetables; dried fruits and vegetables; and full-strength juice may contribute toward the fruits and the vegetables components. Operators must not credit snack-type fruit and/or vegetable products toward reimbursable meals.

13. **Do Child Nutrition (CN)-Labeled Products that include vegetables provide crediting information for vegetable subgroups?**
Yes; CN Labels document the creditable amounts of dark green; red/orange, beans/peas (legumes), starchy, other and -when appropriate, additional vegetables.

14. **Is the limit on juice a daily or a weekly limit?**
The juice limit applies weekly to support menu planning flexibility. No more than one-half of the weekly offering for the fruit component or the vegetable component may be in the form of full-strength juice.

15. **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 fruit juice on one or more days provided the total weekly juice offering does not exceed one-half of the total fruit offerings for the entire week.

16. **Can 100% fruit and vegetable juice blends contribute to the reimbursable meal?**
Yes; if the first ingredient in the 100% juice blend is fruit juice, then the 100% juice blend can contribute to the fruit requirement. If the first ingredient is a vegetable juice, then the 100-percent juice blend can contribute to the "additional" vegetable requirement.

17. **Since the fruit component for grades K-5 and 6-8 is ½ cup daily, does that mean that only ¼ cup juice can be served to comply with the juice limit?**
No; the provision that limits juice to no more than half of the fruits offered applies over the week. Therefore, schools may serve larger quantities of fruit juice on some days a week, provided the total weekly juice offering does not exceed one half of the total fruit offerings for the entire week.

18. **Does the limit on juice to half of the fruit component mean that if I serve 4 fluid ounces of juice to my elementary students I can only credit 2 ounces toward the fruit component?**
No; juice must be credited as the volume served, so 4 fluid ounces will credit as ½ cup. However, no more than one-half of the fruit or vegetable offerings over the week may be in the form of juice. Also, all juice must be 100% full-strength juice; diluted juice is no longer allowed.

19. Is frozen 100% fruit juice without added sugar allowed under the new guidelines?
Yes; frozen 100% fruit juice without added sugar can be used. 100% juice (served liquid or frozen) may be used to meet up to half of the fruit component of the meal pattern requirements for school lunch or school breakfast. Frozen 100% juice meal contributions are based on the fluid volume prior to freezing. SFAs should request this information from manufacturers.

20. Is frozen fruit with added sugar allowed?
Yes; the original restriction was removed permanently by an implementing regulation (79 FR 327) issued January 3, 2014. Frozen fruits with added sugar should be used in moderation to keep the average school meal within the weekly calorie ranges.

21. Is dried fruit with sugar coating allowed?
Yes; dried fruit is sometimes processed with sugar to keep the fruit pieces separated. 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. Dried fruit may be offered as an a la carte item to students as well.

22. If a school meets the fruit requirement for breakfast, can they add a serving of hash browns as an "extra?"
Yes; if a school meets the fruits requirement in the meal pattern, as well as all other component requirements, it may offer starchy vegetables as an extra if this fits within the weekly dietary specifications. The vegetables offered as extras (not as a substitute for fruits) are not covered by the School Breakfast Program (SBP) requirement to offer non-starchy vegetables first when substituting vegetables for fruits. In addition, vegetables that are offered as extras would not count for purposes of OVS. This means that the student that chooses hash browns as an extra item would need to have three other breakfast items on the tray, including at least ½ cup of fruits, to have a reimbursable meal.

23. If the fruit requirement at breakfast is 1 cup, may ½ cup each of fruits and vegetables be served at breakfast--for example: ½ cup juice and ½ cup beans?
Yes; substitutions are allowed at breakfast provided the first 2 cups per week of vegetables substituted for fruit are from the dark green, red/orange, beans/peas (legumes) or ''other vegetables'' subgroups as defined in section 210.10(c)(2)(iii) of the regulations.

24. May a salad bar with fruits and vegetables that is offered as part of the reimbursable meal be located after the point of service (POS)?
As stated in the memorandum on salad bars (SP 31-2013), the POS should be stationed after the salad bar. If a school is not able to position the salad bar in a location prior to the POS, State agencies may authorize alternatives to the POS lunch counts, such as stationing staff at the end of the salad bar to ensure each student leaves with a reimbursable meal. If the fruits and vegetables are located in an approved location beyond the POS, there must be a system in place to ensure that each reimbursable meal selected by the student includes a fruit or a vegetable, and that the total of any fruit or vegetable item selected under OVS equals at least 1/2 cup. Unmonitored salad bars after the POS are considered extra foods that do not contribute toward the reimbursable meal.

25. **Are schools that offer salad bars required to use specific size serving utensils to meet quantity requirements?**
Schools are not required to use specific serving size utensils but may do so to enable children to take the correct food amounts. However, regardless of the serving utensils used, food service staff must ensure that the portions on the student's tray meet the meal pattern requirements. This may be done by training the cashiers to visually identify the correct portions, or by pre-portioning the food items.

26. **Is a mixed salad required to consist of all dark green vegetables or can iceberg lettuce be part of the mix?**
Iceberg lettuce is not considered a dark green vegetable, but a salad that consists of a variety of dark leafy greens (i.e., spinach or romaine lettuce) counts toward the dark green subgroup. If the mixed salad contains different vegetable subgroups and the quantities of each subgroup are known, they can be credited toward each subgroup. If the quantities are not known, a mixed salad counts toward the additional vegetables requirement. (Remember that uncooked, leafy greens count as half of the offering and ⅛ cup is the minimum creditable quantity that may be offered.)

27. **May a school offer a daily salad bar line that offers multiple vegetable subgroups every day as a way to meet the weekly vegetable subgroup requirement?**
Yes; this is acceptable if the salad bar is available to all children each day and offers all of the required weekly subgroups over the course of the week.

28. **Do the vegetable subgroups offered on a daily salad bar need to be itemized on the production records? Do all of these items need to be listed on the menu?**
Yes. Section 210.10(a)(3) of the regulations requires that production records and menu records for the meals show how the meals offered contribute to the required food components and food quantities. These records must be examined by the State agency during the administrative review to ensure the meals offered are reimbursable.

29. **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 garden bar or salad bar that all students can access after they pass through the serving lines.

30. **Can the vegetable subgroups be offered 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 each day the school offers the full daily vegetable minimum. Keep in mind that the minimum creditable amount is ⅛ cup. Example: one day a school offers a ½ cup of bean/corn salsa that includes ¼ cup of beans per

serving and another day that week the school offers a bean burrito that supplies another ¼ cup of beans. This example assumes that the school is providing additional vegetables with each of these meals to meet the minimum daily requirement for vegetables (1 cup for grades 9-12 and ¾ cup for lower grades).

31. Are there maximum limits on the amount of vegetable subgroups offered at lunch?
No; schools must offer at least the minimum quantities of all the vegetable subgroups required in the NSLP meal pattern. There is only a maximum limit on the amount of juice that may be offered under the fruits and the vegetable components. No more than one-half of the fruits or vegetables offered over the week may be in the form of juice.

32. How may beans/peas (legumes) be used in school meals?
Dry/mature beans and peas may be offered as either a meat alternate or as a vegetable, at the discretion of the menu planner. However, one serving may not count toward both food components in the same meal. For example, one serving of refried beans can be offered as a vegetable in one meal and as a meat/meat alternate on another occasion. The refried beans offered as a vegetable count toward the weekly beans/peas requirement, but not toward the meat/meat alternate daily and weekly requirement. Menu planners must determine in advance how to count beans/peas in a meal. For additional guidance on beans and peas, see: http://www.choosemyplate.gov/food-groups/vegetables-beans-peas.html

33. May a school use a food product that contains a non-creditable amount of vegetables (less than 1/8 cup)?
Yes; however the school must offer vegetables in the required amounts over the course of the week from other sources to meet the daily and weekly vegetable requirements.

34. How should schools credit a vegetable mixture toward the vegetable subgroup requirements?
Vegetable combinations from the same subgroup (e.g., carrots and sweet potatoes are red/orange vegetables) may count toward that single vegetable subgroup. Vegetable combinations that contain at least ⅛ cup each of different vegetable subgroups (e.g., carrots and corn) may each be credited toward the appropriate subgroups. If the quantities of the different vegetables are not known, the vegetable mixture counts as "additional vegetables."

35. Where may I find information to help me categorize unusual vegetables?
Please refer to the following websites for information on vegetable subgroups:
http://www.choosemyplate.gov/food-groups/vegetables.html
http://www.cnpp.usda.gov/Publications/USDAFoodPatterns/ItemClustersAndRepFoods.pdf

In addition, the following vegetables have been recently classified by the Center for Nutrition Policy and Promotion (CNPP):

- Orange peppers: Red/Orange
- Yellow peppers: Other
- Purple bell peppers: Other
- Broccoli rabe: Dark green
- Green or red leaf lettuce: Dark green

- Yams: Starchy (white yams only).
  (Note: yellow yams and sweet potatoes are both considered red/orange vegetables. The vast majority of products in US are sweet potatoes, even if labeled "yams/sweet potatoes.")

36. Will schools count the vegetable subgroups when determining the vegetable juice limit?
Yes, the total vegetable offerings, including the subgroups, will be counted when determining the vegetable juice limit. No more than half of the total vegetables (including subgroups) 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.

37. Since there is no maximum on the amount of vegetables, may a school serve the same vegetable everyday provided they meet all the other vegetable requirements and the dietary specifications?
The new meal pattern is intended to increase the variety of vegetables in the school menu. However, a school could offer the same vegetable every day (e.g., carrots) provided the weekly menu meets all other meal requirements, including all vegetable subgroups in at least the minimum amounts, over the week and meets the dietary specifications.

38. If two servings of beans/peas (legumes) are served during one meal, can one serving count as a vegetable and one serving count as a meat/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 (vegetable component) and as part of chili/bean soup (meat/meat alternate component).

39. May a school offer an unmonitored salad bar and count the vegetables toward meeting the subgroup requirements, if the student leaves the Point of Service (POS) with a reimbursable meal?
Salad bars after the POS are acceptable in appropriate circumstances approved by the State agency. In this scenario, for the vegetable subgroups to count, the school has to establish some mechanism to ensure that students are getting the required components and amounts for a reimbursable meal. Otherwise, an un-monitored salad bar after the POS is considered extra food that is not part of the reimbursable meal, but counts toward the dietary specifications. The students must select all the components for a reimbursable meal, including vegetable subgroups, from the hot meal line before the POS.

40. For vegetable blends, are schools allowed to use the documented data provided by the manufacturer to credit towards the vegetable subgroups?
Yes, schools may use the manufacturer's data provided the manufacturer clearly documents the ratio of vegetable mixture in the ingredients. 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, ¼ cup carrots, and ½ cup cauliflower. The service of this vegetable blend does not require monitoring that each portion contains the documented ratios.

41. How is the juice limit assessed if multiple fruits/vegetables and juices are offered each day?

For the purposes of assessing the juice limit, an "offering" of fruits or vegetables is defined as the amount a child is able to select at a given meal, regardless of the number of options/variety of fruits or vegetables. The total amount of juice available at all meals over the course of the week (separately for lunch and breakfast) is then divided by this total fruit offering to determine the weekly juice offering. No more than half of the total fruit offering may be in the form of juice.

For example, a school may offer ½ c peaches, ½ c applesauce, ½ c oranges, and ½ c grape juice every day and instructs the students to select a total of 1 cup of fruit (2 out of 4 choices). In this case, the daily fruit offering is 1 cup, and the weekly fruit offering is 5 cups. Since ½ cup of juice is offered every day, the weekly juice offering is 2.5 cups. Since 2.5 divided by 5 is 50%, this school is within the weekly juice limit.

42. How can juice concentrate credit?

There are four ways juice can credit 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 or frozen juice only. Therefore, juice cannot be credited when used as an ingredient in another food or beverage product. See the Food Buying Guide for Child Nutrition Programs for additional crediting information.

For example: 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 it is no longer in the form of liquid or frozen juice.

43. Can locally-canned foods be used in school meals?

As stated in the Food Buying Guide, home-canned products are not allowable in the school meal program, due to food safety concerns. However, if canned food items (including those produced locally) are produced and processed in an approved facility and meet all Federal, State and local food safety and health guidelines, these items may be used in school meals.

44. At breakfast, could a school menu 1/2 cup 100% vegetable/fruit juice blend and 1/2 cup potatoes every day and fully meet the weekly fruit requirement?

No, because the first two cups of vegetable substitutions for fruit at breakfast need to contribute to the dark green, red/orange, bean/peas, or other vegetables before starchy vegetables can be served. Vegetable juice blends (with or without fruit juice) contribute to the "additional" vegetable subgroup.

1. **Is a daily meat/meat alternate required at breakfast?**
   No. Schools have discretion to offer a meat/meat alternate in place of grains after the minimum daily grains requirement (1 ounce equivalent) is met. Schools may also offer a meat/meat alternate as an extra (not counting toward the weekly grains requirement) if it fits within the weekly dietary specifications.

2. **Are schools required to offer tofu as part of the lunch menu?**
   No. The final rule allows schools the option to offer commercially-prepared tofu as a meat alternate.

3. **Is regular yogurt still creditable as a meat/meat alternate?**
   Yes. There have been no crediting changes to meat/meat alternate options other than the ones specifically identified in the final rule (77 FR 4088).

4. **Is soy yogurt or tofu yogurt creditable as a meat/meat alternate?**
   Tofu yogurt is not creditable; however, ½ cup of soy yogurt (4.0 fluid ounces) may credit as 1.0 ounce equivalent meat alternate.

5. **Is tofu creditable as a meat/meat alternate in the CACFP and SFSP?**
   No. Currently, tofu credits in the NSLP and SBP only. In these school meal programs, 2.2 ounces (¼ cup) of commercially prepared tofu, containing at least 5 grams of protein, is creditable as 1.0 ounce equivalent meat alternate.

6. **How does tofu credit in a combination dish?**
   Firm tofu that meets FNS requirements for tofu can be diced into miso soup and credited toward the meat alternate component – it is recognizable as the meat substitute. The miso ingredient, dissolved into the broth of the miso soup, is a fermented soy product which does not credit – it is not tofu.

   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. Finally, noodles made from tofu do not represent a meat substitute and are not composed of grains. This explains why the noodles are not credited for either component.

7. **Can a school food authority (SFA) rely on the nutrition facts panel alone to evaluate a meat analog, such as a soy burger or tofu sausage?**
   When considering processed tofu products such as links and sausages made from tofu as meat alternates for the reimbursable meal, the tofu ingredient must contain the required 5 grams of protein per 2.2 ounces by weight. However, the additional ingredients beyond the tofu in a meat substitute such as tofu sausage are also included on the nutrition label. Therefore, the protein amount listed on the label for the meat substitute does not necessarily indicate the protein of the tofu for verification of FNS tofu requirements. This information would need to be obtained from the tofu manufacturer.

8. **Why does the lunch meal pattern have a weekly maximum for the meat/meat alternate component?**
The lunch meal pattern includes weekly ranges (minimum and maximum levels) for the meat/meat alternate component to help the menu planners offer age-appropriate and well-balanced meals. FNS has provided flexibility in measuring compliance with the weekly meat/meat alternate ranges; therefore, State agencies will determine compliance based on the required daily and weekly minimum quantities only for meats/meat alternates for certification and monitoring purposes.

The lunch meal pattern reflects a variety of food groups that promote overall health. It includes a meat/meat alternate component and other protein sources that contribute to a meal high in nutrients and adequate in calories. Protein is also supplied by milk, vegetables (especially legumes), and grains. The lunch meal pattern also offers more fruits, vegetable, and whole grains than the previous meal pattern and allows schools to offer nutrient-dense meals consisting of a variety of foods.

9. **Is the daily minimum for meat/meat alternate (and grains) always 1 oz. eq. for grades K-8?**
The menu planner determines the daily amounts for meat/meat alternate and grains provided that *at least* 1 oz. eq. of each (i.e, the daily minimum) is offered daily to grades K-8. On some days, the school must offer more than 1 oz. eq. to meet the minimum *weekly* requirements for the grains and meat/meat alternate components. The menu planner has the flexibility to determine when to offer more than 1 oz eq. to meet the required weekly minimums. Through the use of meal identification signage, students are instructed on how much food to select from each component daily in order to have a reimbursable meal.

GRAINS

WHOLE GRAIN-RICH, FORMULATED GRAIN-FRUIT PRODUCTS, DAILY REQUIREMENTS, BREADING, CREDITABLE AMOUNTS, GRAIN-BASED DESSERTS

*Note: Please see memorandum SP 47-2014 concerning the flexibility to offer enriched pasta in School Years 2014-2015 and 2015-2016 for schools with approval from their State agency. The memo is available at http://www.fns.usda.gov/flexibility-whole-grain-rich-pasta-school-years-2014-15-and-2015-16.

1. **How will schools identify whole grain-rich products?**
   Until the whole grain content of food products is required on a product label by the Food and Drug Administration (FDA), schools must evaluate a grain product using the two-element criterion developed by the Institute of Medicine and set forth in the final rule:

   Element #1 A serving of the food item must meet portion size requirements for the grains/breads component as defined in FNS guidance.

   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/breads 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, manufacturers currently may apply for a CN Label for qualifying products to indicate the number of grains/breads servings that are whole grain-rich.

   b) The product includes the following FDA-approved whole grain health claim on its packaging. "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."

   c) Product ingredient listing lists whole grain first, specifically:

   - Non-mixed dishes (e.g., breads, cereals): Whole grains must be the primary ingredient by weight (a whole grain is the first ingredient in the list)

   - Mixed dishes (e.g., pizza, corn dogs): Whole grains must be the primary grain ingredient by weight (a whole grain is the first grain ingredient in the list).

   The product ingredient listing (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 in their products, and the FDA whole grain health claim is not mandatory. For an in-depth look at the whole grain-rich criteria for school meals, including calculation examples, please see the *Whole Grain Resource for the National School Lunch and School Breakfast Programs* at http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf.

2. **Do grain products have to be 100% whole grain to meet the whole grain-rich criteria in SY 2014-15?**
   No. Whole grain-rich products must contain at least 50-percent whole-grains and the remaining grain, if any, must be enriched.

3. **Does the 50 percent guideline for whole grain-rich apply to the grain content of the product or to the weight of the product?**
   The 50 percent guideline for whole grain-rich requires that the grain content of a product contain 50 percent or more whole grains by weight, and the remaining grains, if any, be enriched. This may be identified if the whole grain is listed as the first ingredient on the label declaration. However, when the whole grain content comes from multiple ingredients, documentation must be provided showing that the whole grains are the primary ingredient by weight even though a whole grain is not listed as the first ingredient.

4. **Will the CN Labeling program specify if whole grains are in a product?**
   Yes. CN labeled products - specify the whole grain-rich contributions to the grains component. Whole grain-rich contributions are designated as "oz eq grains" on CN Labels.

5. **Can schools exceed the upper range of the grains component?**
   The meal patterns include weekly ranges (minimum and maximum levels) for the grains component to help schools plan and offer age-appropriate and well-balanced meals. FNS has provided flexibility in measuring compliance with the weekly grains ranges; therefore, schools that exceed the weekly maximum limit for grains are considered compliant for certification and monitoring purposes. The weekly ranges continue to serve as a guide for planning the grains quantities to be offered over the school week.

6. **Does a school have to offer a whole grain-rich item every day?**
   Yes; all grains offered in the NSLP and SBP each day must be whole grain-rich beginning in SY 2014-2015.*

7. **Are CN-labeled products now required to be whole grain-rich?**
   For combination foods such as breaded products that do not comply with the whole grain-rich (WGR) criteria or contain non-creditable grains present at levels of 2% (0.25 oz eq), the grain portion of the product is considered non-creditable and counted as an "extra food." However, the other food components (meat/meat alternate and vegetable) are creditable. Therefore, the product is eligible for a CN label that credits towards the meat/meat alternate and vegetable components.

   The CN label must also include a disclaimer, stating "This product contains grains that are not creditable in school meal programs. Additional grains must be served to meet meal pattern requirements." The disclaimer must be stated directly under the CN label crediting statement not in the CN box.

For example, a breaded chicken patty contains 0.50 oz eq of grain, but the grain portion does not comply with the WGR criteria or contains non-creditable grains, the breading is not creditable but the chicken may credit towards the meat/meat alternate.

> Each 2.00 oz patty provides 1.50 oz equivalent meat/meat alternate for Child Nutrition Meal Pattern Requirements.
> (Use of this logo and statement authorized by the Food and Nutrition Service, USDA XX/XXXX).

DISCLAIMER: This product contains grains that are not creditable in school meal programs. Additional grains must be served to meet meal pattern requirements.

For CN-labeled products that meet the whole grain-rich criteria, the grain contributions are designated as "oz eq grains" on the CN crediting statement.

8. **Does the removal of formulated grain-fruit products include energy/granola bars?**
The removal of formulated grain-fruit products does not prohibit the use of energy bars, granola bars, cereal bars, breakfast bars, fortified cereals, or cereals with fruit to be credited toward the meal pattern. Formulated grain-fruit products were specifically defined in the school breakfast regulations (appendix A to 7 CFR 220). The final rule removes from the regulations the portion of appendix A that deals with formulated grain-fruit products. These products are highly fortified and have a specific nutrient profile. To credit them in the school breakfast program, they required approval from FNS and a statement on the label saying they met a grain and fruit serving.

9. **Do I have to serve a minimum of 1 ounce equivalent of grains with every breakfast offered, or can I serve some meals that have only meat/meat alternates?**
Every reimbursable breakfast offered must contain at least 1 ounce equivalent grains. In order to offer a meat/meat alternate at any given breakfast meal and receive credit toward the grains component (not as an extra), a school must first meet the daily grains minimum (1 oz eq). Schools have the option to serve one ounce equivalent servings of grains and meat/meat alternate every day at breakfast and count both toward the weekly grains requirement for all grade groups.

10. **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 at least one grain offered daily provide the minimum?**
Every reimbursable meal offered must meet the daily minimum requirements for all components. Therefore, if a pizza contains adequate grains to meet the minimum daily requirement, but a sandwich roll does not, the sandwich meal must contain another grain in order to meet the minimum daily grains requirement.

11. **Can I serve more than two ounce equivalents of grains on any given day? For example, could I serve a 3 ounce equivalent item such as a pizza?**
Yes; a large serving of grains may be offered on any given day if the average meal offered during the week does not exceed the weekly calorie maximums. FNS has provided flexibility in measuring compliance with the weekly grains ranges; therefore, State agencies will focus on compliance with the required daily and weekly minimum quantities for certification and

monitoring purposes. The weekly grains ranges continue to serve as a guide to help the menu planners offer age-appropriate and well-balanced meals.

12. **May a school offer a formulated grain-fruit product to meet the grains component?**
The final rule (77 FR 4088) disallows the use of formulated grain-fruit products to meet both the grains and fruits components at breakfast. However, if a school wishes to use these products to count only toward the grains component, this is acceptable, provided that the product is whole grain-rich and the inclusion of these products does not cause the average school meal offered over the week to exceed the weekly calorie and saturated fat limits. Formulated grain-fruit products do not credit toward the fruits component.

    Be aware that at lunch, however, these products may be considered a dessert and there is a limit of up to two grain-based desserts per week (total of 2 oz eq). SFAs should refer to the Grains Guidance in FNS memo SP 30-2012 to determine which grain products are considered dessert items and included in the weekly dessert limit.

13. **Are fully cooked grain and pasta items whose nutrition label has water as the first ingredient, followed by a whole grain, considered whole grain-rich?**
Yes. In accordance with the 2010 Dietary Guidelines, a grain-based product is also considered 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.

14. **Can schools use the Whole Grain Stamp (from the Whole Grain Council) to determine if a food product meets the whole grain-rich criterion?**
The Whole Grain Stamp is good information to suggest the product contains the proper amount of whole grains, but the content of the whole grain must still be matched against the serving size requirement in the school meal patterns. Products that display the Whole Grain Stamp contain at least 8 grams of whole grain, but they may also contain some un-enriched refined flour which does not meet the grains criteria for Child Nutrition Programs. Therefore, just because a product has 8 grams of whole grains, this does not mean the product will meet the whole grain-rich criteria, which consists of two Elements or parts as explained under Question 1 above. For more guidance on the whole grain-rich criteria, please see memo SP 30-2012 and the *Whole Grain Resource for the National School Lunch and School Breakfast Programs* at http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf.

15. **Do schools have discretion to choose when to count breading toward the grains requirement?**
All grains equal to or greater than 0.25 oz eq (including battered and/or breaded products) must be counted towards the weekly grains requirement. If a product contains grains in amounts of less than 0.25 oz eq, such grains are not considered and, therefore, not counted toward the daily and weekly requirements. All grains offered must be whole grain-rich in order to credit toward the grains component beginning SY 2014-2015. Grains that are not whole grain-rich may be offered as extra food, which counts toward the weekly dietary specifications (including calories, saturated fat and sodium) but does not contribute to the required food components.*

16. **Do schools have to count grains that are less than 0.25 ounce equivalents towards the grains range?**
Grains offered in amounts less than 0.25 oz eq are never included in the calculation of daily and weekly grain offerings. For products from the revised Exhibit A, Groups A – G, this means that there should not be more than 3.99 grams of non-creditable grain. For products from Group H, this means that there should not be more than 6.99 grams of non-creditable grain.

17. **How can schools ensure age-appropriate portion sizes for the grains and meats/meat alternates are met when using a salad bar?**
If grains and/or meats/meat alternates are offered on salad bars, menu planners must ensure that students have access to these components in the minimum quantities specified in the meal pattern. Menu planners must pre-determine serving sizes and meal offerings associated with salad bars, as with all serving lines. Pre-portioning food items and providing appropriate serving utensils are two ways to ensure students select the offered quantities daily and weekly.

Menu planners may also consider offering grains and meat/meat alternates only through the salad bar, and not make it available to students selecting other grains/meat/meat alternates on other serving lines. Schools might also consider issuing guidance or education to students on building a healthy salad bar meal. The memorandum on salad bars offers additional guidance See http://www.fns.usda.gov/salad-bars-national-school-lunch-program.

18. **What ingredients in grain products are considered non-creditable?**
Grains that are creditable in school meal programs are whole meal, whole flour, enriched meal, and enriched flour. Grain ingredients that are not whole or enriched are considered non-creditable. Some non-creditable ingredients found in grain products include oat fiber, corn fiber, wheat starch, corn starch, bran, germ, and modified food starch (including potato, legume and other vegetable flours). If purchased grain products include these non-creditable ingredients, they must be present at a level of less than 2% of the product formula (or less than 0.25 oz eq) for the grain product to be creditable at lunch or breakfast.

If non-creditable ingredients are present at levels of 2% (or 0.25 oz eq) or more per portion, the entire grain portion of the product is considered non-creditable. However, 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, the breading is not creditable but the chicken may still credit toward the meat/meat alternate component.

This policy is intended to support the whole grains-rich requirement while giving operators in exceptional circumstances the flexibility to continue offering combination food items that are not yet available with creditable grain ingredients. FNS expects that as more and better whole grain-rich products become available, the offering of non-creditable grain ingredients will decrease over time.

19. **In a recipe for bread, would ingredients listed as 2 cups of whole wheat flour and 2 cups of white flour meet the 50% whole grain requirement?**
Allowable grain products must contain at least 50 percent whole grains. A product or ingredients containing 2 cups of whole wheat flour and 2 cups of enriched white flour would meet the 50% whole grains requirement if there are no other grains in the product.

20. **Do 100 percent whole grain cereals need to be fortified?**
No, 100% whole grain cereals do not need to be fortified. If a product contains grains in amounts of less than 0.25 oz eq, such grains are not considered and, therefore, not required to be fortified.

21. **When crediting grain items using grams of creditable grain, can 16 grams per ounce equivalent be used for all groups listed in Exhibit A?**
Grain items listed in Groups A-G of Exhibit A (see FNS memo SP 30-2012) may be calculated on the basis of 16 grams of creditable grain per serving. Products in Group H and I must contain 28 grams of creditable grain per serving or use the weights or volumes listed in the revised Exhibit A for the finished product. For Group I, the volumes or weights listed must be offered to credit as one ounce equivalent.

22. **Is there a criterion for identifying grain-based desserts?**
In Exhibit A of memorandum SP 30-2012, some foods are marked as "sweet" and in the footnotes 3 & 4 are designated as desserts for lunch. There is not a specific amount of sugar, fat, etc. that qualifies a grain product 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. We do recognize that some sugar is needed in baking breads and other grain items that are not generally served as desserts. Note that crackers and cookies do not have a standard of identity, so a manufacturer may come up with fanciful names that could mislead the menu planner into serving a product that may not be appropriate. The menu planner should use typical perceptions of the product as a way to determine how to menu the item. The menu planner should also be aware that even if a product is not labeled as a traditional dessert/sweet item, higher levels of sugar, fat, and sodium could cause challenges in staying within the weekly dietary specifications.

23. **Does the flexibility in the upper limit for grains include flexibility in the 2 oz. eq. maximum for grain-based desserts?**

No. The 2 oz. eq. per week limit on grain-based desserts is still in effect. In addition, menu planners should be cognizant of the grains weekly maximum to help them plan menus that meet the dietary specifications. Further, if a grain-based dessert is made from non-creditable grains, it still counts toward the 2 oz. eq. per weekly limit.

24. **May grain-based desserts be offered more than twice a week?**
A school may offer a total of 2 oz eq or less of grain-based desserts each week. Therefore, a 2 ounce equivalent dessert may be offered once per week, or a 0.5 oz eq dessert may be offered four times in a week.

25. How do I know if the RTE breakfast cereal I am evaluating is "fortified" to meet school meal program requirements?

Cereal products that have been fortified are labeled as such and have an ingredient statement similar to the following (for EXAMPLE purposes only):

Ingredients: Whole wheat, sugar, oats, contains 2% or less of salt, baking soda, caramel color, annatto color, BHT for freshness.

Vitamins and Minerals: Vitamin C (sodium ascorbate, ascorbic acid), niacinamide, vitamin B6 (pyridoxine hydrochloride), reduced iron, zinc oxide, folic acid, vitamin B2 (riboflavin), vitamin B1 (thiamin hydrochloride), vitamin A palmitate, vitamin D, vitamin B12.

26. What whole grain health claims are acceptable when qualifying a product as whole grain-rich?

While guidance memoranda regarding grains (*SP 30-2012 and SP 2-2013),* and the recommendations from the Institute of Medicine are focused on the FDA's whole grain health claim for grain products *low in fat*, whole grain health claims for products *moderate in fat* may also be used to qualify a product as whole grain-rich. Menu planners will need to consider how use of these or any products will impact the dietary specifications for calories, saturated fat, trans fat, and sodium. The following are examples of FDA whole grain health claims that may be used:

"Diets rich in whole grain foods and other plant foods and low in total fat, saturated fat, and cholesterol, may help reduce the risk of heart disease and certain 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"

27. Can wheat bread, rolls, and buns labeled as "100% whole wheat" be used to meet school meal requirements for grains?

Yes. Products that are 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 and are easily identifiable as meeting the grain requirements for school meals.

28. If I serve a sandwich with one piece of enriched bread and one piece of 100% whole grain bread, does that meet the 50% whole grain-rich requirement?

Yes. While operators are encouraged to offer sandwiches made entirely from whole grain-rich bread, this practice is acceptable. However, for distinct food items offered to students, such as a pasta dish plus a breadstick, each food item must be whole grain-rich.

29. 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?

The procurement process is the best time to address non-creditable grains. 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.

ALLOWABLE TYPES, MILK SUBSTITUTES, SPECIAL MILK PROGRAM

1. **What types of milk are allowed?**
   Only fat-free (unflavored and flavored) and low-fat (1%) milk (unflavored) may be offered as part of the reimbursable meal for children in grades K to 12. This requirement only also applies to the meal pattern for Pre-K students, ages 3 and 4.

2. **Does the final rule impact the current provision on non-dairy milk substitutes for children with special dietary needs?**
   No. Required (disability accommodations) and optional (parent requested) milk substitutes are considered meal exceptions and are not subject to this final rule. Milk substitutes must meet the regulatory standards outlined in 7 CFR 210.10(d)(3), which do not address fat or flavor/sugar restrictions.

   However, milk substitutes offered as part of the reimbursable meal must be included in weighted nutrient analysis and, therefore, are subject to the overall weekly average fat limit and calorie ranges. We do not expect that they are offered frequently enough to have a significant impact on the overall nutrient analysis.

3. **Does the requirement to offer unflavored/flavored fat-free milk or unflavored low-fat milk apply to other school meal programs, such as the NSLP snack service and the Special Milk Program (SMP)? Is a variety of fluid milk required in these programs?**
   The NSLP snack service must offer unflavored/flavored fat-free milk or unflavored low-fat milk. Milk variety is not required in the NSLP snack service. In the SMP, only the milk fat restriction (fat-free and low-fat milk requirement) applies. The limit on flavored milk and the milk variety requirement do not apply to the SMP. This policy is consistent with memorandum FNS-29-2011, which implemented the Healthy, Hunger-Free Kids Act provision regarding milk in the meal programs authorized by the Richard B. Russell National School Lunch Act and the Child Nutrition Act in an effort to reduce childhood obesity. FNS will codify the nutritional requirements for milk in the SMP in a separate regulatory action.

4. **Are Residential Child Care Institutions (RCCIs) required to offer milk variety daily?**
   Consistent with memorandum SP 38-2012, RCCIs that are juvenile detention centers may meet the milk variety requirement over the week rather than daily if there are potential, legitimate safety concerns regarding offering different milk to students. For example, the RCCI may offer all students flavored nonfat milk on some days of the week, and unflavored low-fat milk on other days.

5. **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; provided the milk meets State and local standards for pasteurized fluid milk. Milk intended to be consumed as a beverage that has been dispensed (recombined or reconstituted) with the appropriate amount of water so that it could be labeled as "recombined milk" or

"reconstituted milk" and so that it meets the nutrition requirements for fluid milk in the regulation (7 CFR 210.10 (d)(1)), may be offered with the school meals.
As with all food preparation, recombination and reconstitution methods should include the proper safeguards for food safety. It is important to point out that procurement practices require consideration of the Buy American provision (7 CFR 210.21(d)) for all foods purchased, including fluid milk.

1. **What is the sodium requirement and when will schools have to meet it?**
   Target I of the sodium limits became effective July 1, 2014. Implementation of the second and final targets is subject to USDA's review of data on the relationship between sodium intake and human health, as required by the FY 2012 Agriculture Appropriations Act. See the following chart for all deadlines and corresponding maximum limits.

Sodium Limits and Timeline		
Target I: SY 2014-15 Lunch ≤1230mg (K-5) ≤1360mg (6-8) ≤1420mg (9-12) Breakfast ≤540mg (K-5) ≤600mg (6-8) ≤640mg (9-12	**Target 2: SY 2017-18** Lunch ≤935mg (K-5) ≤1035mg (6-8) ≤1080mg (9-12) Breakfast ≤485mg (K-5) ≤535mg (6-8) ≤570mg (9-12	**Final target: 2022-23** Lunch ≤640mg (K-5) ≤710mg (6-8) ≤740mg (9-12) Breakfast ≤430mg (K-5) ≤470mg (6-8) ≤500mg (9-12)

2. **How is USDA facilitating implementation of the sodium requirement?**
   Target 1 of the sodium limits, beginning SY 2014-2015, is in place for three school years to give the food industry time to reformulate products, and to allow school children to grow accustomed to foods with less salt. USDA is facilitating the sodium reduction in school meals by offering low-sodium products through USDA Foods. For example, the USDA Foods program offers low sodium canned beans and vegetables at no more than 140 mg per half-cup serving, which is in line with the requirement to decrease sodium in school meals. The sodium content in most cheese products has been reduced, and there is wide availability of frozen vegetables and meats without added salt. Team Nutrition has also developed practical guidance to help menu planners move toward sodium reduction.
   See http://www.fns.usda.gov/healthierschoolday/tools-schools.

3. **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.

NATURALLY-OCCURRING TRANS FAT, MIXED DISHES, NUTRIENT ANALYSIS SOFTWARE

1. **Does the trans fat ban apply to naturally occurring trans fat in beef?**
   No. Naturally occurring trans fat found in products such as beef, lamb, and dairy products made with whole milk is excluded from this ban. If there is trans fat listed on the nutrition facts panel of a product containing meat or dairy, the School Food Authority (SFA) should request documentation from the manufacturer that reports the source of the trans fat.

2. **How can a menu planner ensure meeting 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 certain way to determine if the product is in compliance is for schools to request information from suppliers on how much of the trans fat is naturally occurring versus if any of the ingredients contain added (synthetic) trans fat.

3. **Can I use software to determine the amounts of trans fat in our menus?**
   Trans fat is not required in an approved software program used by the State agency to conduct a nutrient analysis of the one-week menu. Software may be used for trans fat analyses for informational purposes; however, current nutrient databases do not have complete data for trans fat. As more trans fat information becomes available, it will be included in the Child Nutrition Database required by all USDA-approved software. Therefore, SFAs must use nutrition facts labels and manufacturer specifications to determine the amount of trans fat per serving.

1. **May a school deviate from the required age/grade group to meet the calorie needs of an older or younger student who is placed in the group for developmental or other exceptional reasons?**
   Schools are allowed, on a cases-by-case basis, to offer age-appropriate meals to individual students in unique situations (for example: a 16-year old teen with developmental issues placed with age/grade group K-5). The State agency may require the school/School Food Authority to seek permission prior to deviating from the required meal pattern for the prevalent age/grade group. This is important because the State agency is responsible for promoting proper implementation of the meal requirements.

2. **May a school offer more calories to certain students, such as athletes and pregnant teens, to meet their energy needs?**
   Yes. The nutrition standards for the reimbursable school meal were designed based on age-appropriate nutrition and physical activity habits of the average student. However, USDA provides schools flexibility and options to both comply with the nutrition standards and meet the needs of students who might require additional calories and protein. 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 choose to allow students to take second servings of some foods. Furthermore, students may purchase additional food a la carte.

3. **Why do the new meal patterns now place maximum limits on the calorie content of the school meals?**
   At present, one in three children is overweight or obese. School meals play a critical role in helping children learn how to select balanced meals and appropriate food portions. The new reimbursable meal patterns are designed to meet the needs of most school children.

   The calorie minimum and maximum levels (and related food portions for various components) are based on data pertaining to children's healthy weight, physical activity level, and opportunities for meals and snacks outside of the school meals programs. While these new calorie levels are comparable to the previous minimum calorie standards, the new school meals offer adequate amounts of nutrients and food. The new reimbursable meal patterns require schools to offer nutrient-dense meals that provide children more fruits, vegetables, and whole grains than specified by the previous meal patterns.

   Additionally, the dietary specifications for meals are based on weighted weekly averages. They do not apply on a per-meal or per-student basis. Since the specifications are weighted, if a menu planner offers food choices or employs Offer versus Serve, some students may ultimately select meals containing more than the upper limits, while some select less. Historical usage and trial and error regarding what foods are typically declined can assist menu planners with offering options that address the needs of most students.

1. **How do I serve meals in 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-12 overlap. Therefore, a menu planner may offer the same food quantities to all children 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 be used to meet the needs of children in grades K-8. The daily minimum requirements for food components are identical. However, in order to meet the meal pattern and dietary specifications for both age/grade groups , menu planners must work within the following parameters: 8-9 oz eq grains/week, 9-10 oz eq meats/meat alternates/week, average daily calorie range 600-650, and average daily sodium limit ≤less than or equal to 1,230 mg (Target I effective SY 2014-2015).

   Note: When monitoring compliance with the grains and meat/meat alternate weekly ranges, the State agency will assess compliance with the daily and weekly minimum requirements only.

   Menu planners must adapt in order to offer menus that meet requirements for grades 6-8 and 9-12 in a single school, since one single menu with the same amounts of food will not work. Additionally, the new meal pattern does not allow for schools with a grade configuration with one grade above or below the grade grouping to follow the predominant grade group requirements (as was previously allowable). However, modest adaptations can be made to menus to accommodate both grade groups in a single school.

   One way to ease menu planning for these two grade groups within one school is to start with a menu that is appropriate for grades 6-8, then add in a few additional foods for the older grade group. For the older children (grades 9-12), the fruit and vegetable minimums must be met. Therefore, on top of the requirements for the 6-8 group, schools must make available to the older children: ½ cup more fruit daily, ¼ cup more vegetables daily and across the week: ½ cup more red/orange, ¼ cup other, ½ cup additional (any subgroup) vegetables.

   An alternate suggestion is to make the full 1 cup fruit and vegetables required for grades 9-12 available to both grade groups (same menu plan for these 2 food components), if such offerings do not exceed the calorie limit for the 6-8 grade group. One potential method of doing so would be offering a salad bar to all students. Or, to meet the additional calorie needs of the 9-12 grade group, consider an additional ounce equivalent of grains or meat/meat alternate served to the older children (e.g., additional bread option, larger entrée serving size).

2. **How will schools with a shorter or longer school week implement the new meal pattern requirements?**
   Schools that regularly serve lunch 6 or 7 days per week must increase the weekly grains quantity by approximately 20 percent (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 percent (1/5) for each day less than five.

   For schools with occasional decreases in the school week length due to holidays, for example, the menus do not have to be adjusted, but menu planners must plan their menus in a way that is consistent with the intent of the meal patterns. Planners should make sure they do not consistently fail to offer certain vegetable subgroups, or offer meat/meat alternates and/grains in portions that would exceed weekly dietary specifications.

   Please see attached charts for appropriate quantities for varying school week length.

3. **When menu planners adjust the vegetable subgroup requirement in the NSLP meal pattern for a 4-, 6- or 7 –day school week, will they be able to round the resulting figures/numbers (i.e., 0.5 and 0.75 cups)?**
   Please see attached charts for appropriate quantities for varying school week length.

4. **If pre-K and elementary students are in the cafeteria at the same time, may the school serve the pre-K children the new meal pattern?**
   Yes, if a menu planner wishes to offer a single menu to meet the meal requirements for both Pre-K and grades K-5, they may do so. Operators serving the SBP meal pattern will meet the minimum requirements for the current CACFP breakfast meal pattern. For lunch, operators following the K-5 NSLP pattern to serve Pre-K will be considered in compliance. The NSLP meal pattern will meet the CACFP meal pattern over the course of a week. School Food Authority (SFAs) should consult with their State agencies if they have questions on whether their menu meets requirements for both groups.

5. **When are year-round schools including RCCIs required to comply with the new meal pattern?**
   All SFAs, including RCCIs, must follow the new meal pattern effective July 1, 2012.

6. **The new meal patterns refer to "age/grade groups." Should we determine which ages apply to each grade group?**
   No. The term "age/grade groups" refers to grade groupings only. The classification of grade groups K-5, 6-8, and 9-12 was 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 therefore plan menus based on the grade levels of students. For specific guidance, SFAs are encouraged to consult with their State agency to determine appropriate grade groups for such a school.

7. **Must schools meet the meal pattern requirements for field trips?**
   Children on a field trip must be offered lunches that meet the daily meal component requirements. However, the menu planner does not have to adjust the planned weekly menu

to account for occasional field trips, and does not have to pack the same vegetable offering from that day's "hot" lunch menu for a field trip. The menu planner has the option to offer a different vegetable, or a different vegetable from the same subgroup. However, the meals from field trips would need to be included when planning meals that meet the weekly requirements, including dietary specifications (calories, saturated fat, and sodium).

8. **Can the calorie limits be waived for RCCI students who participate in physically demanding activities all day?**
   Schools or RCCIs as a whole are NOT able to waive the caloric (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 for any entity when it relates to the nutrition standards.

   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 through the afterschool snack program.

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

1. **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 seven day meal pattern or a two day meal pattern?**
   For weekend meals, the RCCI must follow 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 provided at the end of the QAs. Only the "additional vegetables" category is adjusted, and no adjustment to any of the dietary specifications is required since they are weekly averages (the same value applies, 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 the nutrient analysis.

2. **How is family style handled in light of the new calorie limits and quantity requirements?**
   Family style will continue to be allowed in RCCIs and schools, but the operator must plan and offer the required food quantities for each child participating in the meal service. The meals offered must meet the food component and dietary specification requirements.

3. **Do reimbursable meals that offer pre-packaged or vending machine-based meals have to meet all the vegetable subgroup requirements?**
   Yes. All meals, including those offered through vending machines and pre-packaged, must be planned over a week to meet the daily and weekly meal pattern requirements, including the vegetable subgroups. If a vending machine is designed to allow a child to choose one sandwich and provides a selection of all vegetable subgroups over the week, this would meet the vegetable weekly requirement.

4. **If a recipe or menu item contains several grain sources, how does the menu planner calculate the total grains contribution from that item?**
   The menu planner should add the amount of ounce equivalents for each grain ingredient, then round down to the nearest 0.25 oz eq. According to the Food Buying Guide (FBG), p. A-6 (rev. Nov 2001), the instructions for calculating grains contributions in recipes are to determine the contribution of each grain first (how many servings according to the FBG) to the total recipe, add together, divide by number of servings in the recipe, and then round the individual serving amount down to the nearest 0.25 oz eq. The same process would apply to grains put together in one dish, such as for a sandwich. For example, one would add the grain contributions of 2 separate slices of bread together first (if each slice is 0.8 oz eq, the sum is 1.6 oz eq) and then round the total number down (in this example, 1.6 oz eq rounds down to 1.5 oz eq of creditable grains).

5. **Are school districts allowed to offer extra food that could not credit as part of the reimbursable meal (e.g., ice cream bar) after the point of service?**

Yes. However, any extra food that is offered to the student as part of, not in addition to, a reimbursable meal must be included in the nutrient analysis and count toward the limits on calories, saturated fat, sodium and trans fat.

6. **May a school serve second servings of a food item by allowing students who have purchased their reimbursable meal go back to the serving line for more food (food is not claimed, just given)?**
   Yes. If second helpings or second meals are sold a la carte, they do not contribute toward the components or dietary specifications for reimbursable meals. However, if a school elects to offer second servings of any part of the reimbursable meal without any additional charge, these foods must be counted toward the weekly dietary specifications.

7. **May a school offer pudding or ice cream as desserts for extra calories?**
   Desserts such as pudding and ice cream are not considered part of the reimbursable meal. If offered as extra food, they must be taken into account when assessing the dietary specifications of the meal (i.e., calories, saturated fat, trans fat and sodium levels).

8. **May a school serve yogurt at breakfast simply to up the calories but choose not to count it?**
   Yes; however, adding yogurt as "extra" food would count toward the dietary specifications (calories, sodium, saturated fat, and trans fat levels).

9. **How are leftovers accounted for in regards to adherence of the meal pattern requirements and dietary specifications?**
   Occasional, small quantities of leftover food served on another day will not be counted toward the meal pattern requirements, 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. School Food Authority (SFAs) may also freeze leftovers and serve them first on the serving line, following standard HACCP 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 the school consistently has leftovers to add to each day's menus, schools need to consider participation trends in an effort to provide one reimbursable lunch for each child every day.

10. **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, then 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.

11. **May a school district require students to select a variety of vegetables to help limit additional servings of one vegetable?**

The meal pattern requires a variety of vegetables be offered over the school week and does not put any limits on the amount of vegetables (or fruits) children may take. However, to stay under the required calorie, sodium and saturated fat limits, a school may want to limit second servings of some vegetable dishes because they must include second servings and extra foods in the nutrient analysis. Therefore, schools should consider the types of foods that students are more likely to select as a second serving and determine how these alter the nutrient analysis.

Schools can easily minimize the impact to the nutrient analysis by modifying the way in which vegetables are offered in the menu. For example, allow students to "choose 0-1" of the food items that would negatively alter the nutrient analysis if chosen as a second or extra, while allowing students to take seconds or extras of those vegetables that do not negatively alter the nutrient analysis if chosen as a second or extra. For example the school could allow the students to "choose 1 or more" of these vegetables. It is important that each school determine how seconds and extras impact their nutrient analysis and plan menus appropriately.

12. Does free, extra food offered after the Point of Service (POS) to children who have a reimbursable meal count toward the dietary specifications?

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

13. May a school offer extra, free beverages (100% juice, water, iced tea, etc.) after the Point of Service (POS)?

Yes, a school may offer extra beverages after the POS, but these must be considered when analyzing the calorie, saturated fat, and sodium levels associated with the reimbursable meal. The menu planner must be very cautious not to exceed the maximum limits for calories, saturated fat and sodium by offering extra beverages after the POS. Full-strength juice offered after 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 the school meal. It could also discourage students' consumption of fluid milk, which must be offered with the meal. Additionally, SFAs 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.

14. May schools implement innovative and creative approaches to menu planning while adhering to the requirements of the meal pattern?

Yes; menu planners and SFAs are highly encouraged to adopt or maintain innovative approaches to preparing and serving school meals. Such approaches may include pairing schools with local chefs in order to develop recipes that are healthful and appealing,

expanding salad bar offerings, or involving students in taste tests or recipe contests. Creative methods of implementing the meal pattern requirements increase the likelihood of student acceptance and participation in the school meals programs.

15. Will SFAs have to centralize their menus to ensure compliance with the updated meal pattern requirements?

No; there is no requirement for centralization of menus. Instead, SFAs should assess all of their menus overall and determine what will best meet their unique needs in order to achieve compliance. This may include retaining some flexibility at the school level (offering different menus for different schools), or adopting part or all of the most successful and creative school-level programs at the district level. Some SFAs may choose to initially adopt a district-level menu that meets the updated meal pattern, then work to reintroduce appropriate school-level modifications that continue to meet the new standards.

16. How does fruit in desserts credit toward the lunch meal pattern?

The fruit in the dessert can credit toward the fruit component, regardless of whether the fruit is fresh; dried; or canned in 100 percent juice, light or extra light syrup. For grain-based desserts with fruit (such as pies, cobblers, or crisps) only the grains portion (e.g., crust) counts toward the grain-based dessert limit (2 oz eq per week). A sweetened fruit dessert without grains, such as fruited gelatin or a baked apple, does not count toward the weekly limit on grain-based desserts. However, schools should offer sweetened fruit in moderation in order to stay under the weekly calorie maximum at lunch.

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

Yes. If an SFA chooses to offer these children milk a la carte at no charge or at a price lower than the cost, this is an appropriate use of food service account funds. However, because milk offered outside of reimbursable meals is a non-program food, the SFA must generate adequate revenue from other non-program foods so that the total revenue meets the requirements in 7 CFR 210.14(f).

1. **For menu planning purposes, when multiple choice menus are served, how are minimums and maximums 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). The meal patterns also include weekly ranges (minimums and maximums) for the grains and meat/meat alternate components. The weekly maximum levels serve as a guide for menu planners to offer age appropriate meals. However, when monitoring compliance with the grains and meat/meat alternate requirements, the State agency evaluates compliance with the daily and weekly minimum requirements only.

   Daily minimum - example: In grades 9-12 the minimum daily grain requirement 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 ounce equivalent of grains, only 1 of those offerings meets the 2 ounce minimum. The student would need to have another ounce equivalent offered with the stir fry, such as a side item, in order to meet the daily grains minimum.

   Weekly minimum – example 1: School Food Authority (SFAs) must also offer a weekly menu that meets the weekly minimum requirements for grains and meats/meat alternates. For grades K-5 and 6-8, the daily grains minimum is only 1 oz eq and the weekly grains minimum is 8 oz eq. The offering of 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 applies to the weekly minimum amount of meats/meat alternates.

   Weekly minimum – example 2: If a grade K-5 school offers a 1 oz eq grain item (salad) 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 of 8 oz eq.

   To avoid providing excessive calories, saturated fat and sodium, the menu planners also must aim to stay near or within the weekly maximum levels for grains and meat/meat alternates.

2. **When serving multiple choice menus, is every grain choice required to be whole grain-rich?**
   Yes; SFAs are required to offer only whole grain-rich items beginning SY 2014-2015. However, subject to State agency approval, there is flexibility to offer enriched pasta in school years 2014-2015 and 2015-2016 for schools that demonstrate significant challenges in preparing and serving whole grain-rich pasta (see memo SP 47-2014 at http://www.fns.usda.gov/flexibility-whole-grain-rich-pasta-school-years-2014-15-and-2015-16). All grains other than pasta, if the flexibility is being used, must be whole grain-rich.

3. **When multiple serving lines are used in a school, must each line meet the weekly vegetable subgroup requirement?**
   Yes, in most cafeteria set-ups. As required in Section 210.10(k)(2), each independent line must meet the daily and weekly requirements (including subgroups), in order to ensure that a child is able to take a reimbursable meal every day in any line they may choose. If the school sets up serving stations, where a student is able to go to several different places to select different components of the meal (e.g., first goes to a salad bar, then goes into a pasta station) before passing the point of service, then all of the stations as a whole must meet the daily component and weekly vegetable subgroup requirements.

4. **How do I plan my menu to meet the vegetable subgroups when I have multiple choices on my serving line?**
   Each of the subgroups must be available to all children in at least the minimum amounts during the week. A child should not have to choose one subgroup over another on a day, and lose the opportunity to select the other subgroup that week. If the menu is planned in a way that limits the student's opportunity to select all vegetable subgroups over the week, the school needs to modify the week's menu to prevent such conflict. For example, if the required dark green vegetable subgroup is offered in one food item/entree and the beans/peas subgroup is offered in a different food item/entrée on the same day, and the student can only pick one, the school must provide another opportunity to select either dark green vegetables or beans/peas later in the week in order to prevent a subgroup conflict.

1. **How is OVS implemented under the final rule?**
   OVS continues to be a requirement in the NSLP for senior high schools, and is an option for lower grade schools. It is also an option for the school food authority for all schools in the SBP. Under OVS, schools must offer all the required food components and quantities, and students are required to select at least 3 components in the NSLP and 3 food items in the SBP, as noted below:

   NSLP: In the NSLP, schools must offer 5 food components (milk, fruits, vegetables, grains, meat/meat alternates). Students are allowed to decline 2 of the 5 required food components, but must select at least ½ cup of either a fruit or vegetable. Students must select the other food components in quantities that are equal to or greater than the daily minimum required amounts.

   SBP: In order to carry out the OVS option in the SBP, schools must offer 3 food components (milk, fruits and grains) that consist of a minimum of 4 food items. Students are allowed to decline a food item but must select at least ½ cup of fruit and at least 2 other food items. If the breakfast offered includes more than the 4 food items needed for OVS, there is an opportunity for students to decline more than 1 food item. Students must select at least 3 food items.

   Additional detail on OVS for both breakfast and lunch can be found in the OVS manual, updated for SY 2014-15.

2. **Can a student meet the OVS ½ cup requirement for fruit or vegetable by selecting ½ cup of a dish containing a mixture of fruits and vegetables?**
   Yes, a student may select a ½ cup that consists of different fruits (e.g., fruit salad), or different vegetables (e.g., mixed vegetables) or a combination of only fruits and vegetables (e.g., carrot/raisin salad). Keep in mind that the ½ cup allowance for fruit or vegetables may be used only once for either the fruits or the vegetables component in a meal, so the other food components selected by the student under OVS must meet at least the minimum daily required serving size.

3. **Can a student meet the OVS ½cup requirement for fruit or vegetable by selecting ¼ cup fruit and ¼cup vegetable?**
   Yes. Although fruits and vegetables are separate components in the meal patterns, the OVS requirement to select at least ½ cup of fruits or vegetables daily for a reimbursable meal may be met if the student selects ¼ cup of fruits and ¼ vegetables. This is another way to promote the consumption of fruits and vegetables among children. The student would not be required to select additional fruits or vegetables if the reimbursable meal under OVS includes two other components that meet at least the minimum daily required serving size.

4. **May students take a smaller portion of both fruits and vegetables under OVS?**

Under OVS, students must select at least ½ cup of either the fruit or the vegetable component, or a ½ cup combination of both components (¼ cup fruits and ¼ cup vegetables), for a reimbursable meal. If a student selects only three components, and two of these three components are fruits and vegetables, the student may select ½ cup of either the fruit or vegetable, but then must select the full component of the other.

For example, if a student in grades 9-12 selects just milk, fruit and vegetables, the student may take ½ cup of the vegetable but must take the full 1 cup offering of the fruit. However, if the student selects another full component, such as a grain or meat/meat alternate, the student may take a smaller portion of the fruit because the fruit is no longer being counted as the 3rd component in the reimbursable meal.

5. **Must the School Food Authority (SFA) prepare full servings of both fruits and vegetables for every student when OVS is in place?**
   SFAs must plan meals in the NSLP and SBP to meet all meal requirements and provide required amounts of food for all students. Menu planners should take into account participation and selection trends to determine what and how much food to offer students. Careful menu planning will ensure that students have access to all the required food components for the reimbursable meal and minimize food waste.

6. **The regulations allow students to decline two components at lunch. Does this remove the SFA's option to choose the number of components that may be declined in elementary and junior high/middle school?**
   Yes. The number of components that may be declined at lunch under OVS is the same for all age/grade groups.

7. **Can a menu planner split the food offered to meet the grains component, or the meat/meat alternate component, into multiple food items and allow students to select only one item under OVS?**
   Yes, a menu planner may split a component into multiple items. Under OVS, the student must take at least the daily minimum required by the meal pattern. For example, a K-5 school offers 2 ounce equivalents of grains: spaghetti (1 oz eq) with a dinner roll (1 oz eq). Since the minimum daily grains requirement for grades K-5 is only 1 oz eq, the student may take either the dinner roll (1 oz eq) or the spaghetti (1 oz eq) and count as meeting the grains component under OVS. This also applies to the meat/meat alternate component. In grades 9-12, since the daily minimum is 2 oz eq, students must select at least 2 oz eq of grains or meat/meat alternate to count toward these components. Students are instructed on how much of each component must be selected through meal identification signage.

8. **Is pre-plating allowed under OVS?**
   Pre-plated meals continue to be permitted as schools, including RCCIs, are not required to change their meal service systems to accommodate OVS. However, schools and RCCIs are encouraged to modify their meal service systems to include OVS opportunities to the extent possible.

When offering pre-plated meals, schools must offer the food components and quantities specified by the meal patterns for each age/grade group. Although schools must plan to offer the grains and meat/meat alternates components daily and weekly in the amounts specified in the meal patterns, exceeding the weekly maximum limits for these components will not be considered a violation during the administrative review.

9. **May an SFA or a school using OVS require students to pre-order or pre-select meals?**
   Yes. This is acceptable if the operator offers all the food components/quantities required, and students are able to preselect a full reimbursable meal. Furthermore, if OVS is in place, students must be able to decline items they do not want and select the minimum required amounts for at least three food components, including a fruit or a vegetable. One acceptable option is for students to pre-order the entrée and choose the side dishes at the point of service.

10. **Does OVS require that a school offer daily choices within each of the food components?**
    Schools are required to offer all the food components (including all the vegetable sub-groups over the week) while allowing children to decline a limited number of food items they do not intend to consume. OVS does not require that children be offered a variety of fruits and vegetables, or choices within other components.

1. **Will the products provided by USDA Foods enable schools to offer meals that meet the new requirements?**
   USDA Foods represent about 15-20% of the foods used in the National School Lunch Program. These products help schools stretch their food budgets and meet the meal pattern requirements. USDA Foods offers a wide range of nutritious options such as fresh, frozen, canned and dried fruits and vegetables, whole grains, and a variety of lean, lower sodium meat and meat alternates to help schools meet the meal pattern requirements. USDA has improved its product offerings to align with the new meal pattern requirements by increasing the variety of fruits and vegetables available, increasing whole grain options, and reducing sodium, fat, and added sugars in many of its products.

   To see the complete list of nutritious options available through USDA Foods, visit: http://www.fns.usda.gov/fdd/foods-expected-be-available.

2. **Do the products available through USDA Foods meet the whole grain-rich requirements?**
   Beginning July 1, 2014, USDA Foods only offers whole grain-rich products for direct delivery to schools. The USDA Foods list provides a wide variety of whole grain-rich options, including whole grain pastas, brown rice, whole wheat flour, whole grain tortillas, whole grain pancakes, rolled oats, and whole grain breaded catfish strips. USDA Foods continues to explore other whole grain-rich products to continue to meet schools' needs.

3. **How can USDA Foods help my school district to meet the fruit and vegetable requirements?**
   USDA Foods helps schools to meet the fruit and vegetable requirements by offering a wide variety of fruit and vegetable options in various forms such as fresh, frozen, canned, and dried. USDA Foods offers more than 100 different fruit and vegetable products, including choices from each vegetable subgroup. USDA Foods offers only low-sodium or no salt added canned and frozen vegetables and unsweetened or extra light canned and frozen fruit. USDA recently added a variety of new options such as frozen broccoli, chopped spinach, dried cranberries, and diced mushrooms and pinto beans for processing. USDA continues to explore other fruit and vegetable options to help schools continue to meet the meal pattern requirements. Additionally, schools can use their USDA Foods planned assistance level to request fresh fruits and vegetables through the Department of Defense Fresh Fruit and Vegetable program.

   For more examples to showcase how USDA Foods help schools meet the meal pattern requirements,
   visit: http://www.fns.usda.gov/sites/default/files/Meal_Pattern_USDA_Foods_Chart_Sept2013.pdf

4. **Will the products provided by USDA Foods help my school district to meet the sodium requirements?**
   USDA Foods only offers low-sodium or no salt added canned and frozen vegetables. Additionally, USDA has reviewed the sodium specifications across the other product categories and worked with industry to make reductions, while still achieving the same functionality. Recent USDA Foods reductions to sodium specifications include mozzarella cheese, chicken fajita strips, ham products, and whole grain breaded catfish strips. These lower sodium options offer schools more flexibility in meal preparation and menu planning to adapt to the regional and cultural preferences of the students served. USDA Foods continues to review product specifications and make further reductions to sodium where possible to help schools meet the sodium requirements.

1. **The final rule established three age/grade groups for the NSLP and SBP. Does this mean that schools cannot offer the same meal pattern to all grade levels?**
   Correct. In individual cases where a school district has an unusual grade configuration that prevents the use of the required age/grade groups, it may serve the same lunch 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 grade group are met on average over the school week. An example of this accommodation is provided in the rule preamble.

2. **What age/grade groups must a K-8 school use for menu planning?**
   If a K-8 school is unable to effectively offer different meal patterns for the K-5 students and the grade 6-8 students, the menu planner may offer students in these grades the same quantities of the food components because the quantities required by the lunch meal patterns for the age/grade groups K-5 and 6-8 are the same or overlap. For example, the school would have to offer 8-9 oz eq of grains and 9-10 oz eq of meat/meat alternate to all students to meet the requirements established for groups K-5 and 6-8. In addition, the meals offered to these students must consist of 600-650 calories to meet the dietary specification for both groups. Furthermore, the sodium content of these meals, when in effect, must meet the sodium specification for the youngest group: K-5.

3. **What age/grade group must a 7-12 school use for menu planning?**
   The school meal patterns for each age/grade group are intended to result in age-appropriate and nutritious meals that promote healthy weight. Menu planners may offer somewhat similar menus to children in age/grade groups 6-8 and 9-12. Since the breakfast food portions for all age/grade groups overlap, a menu planner may offer the same food quantities to all children provided that the meal meets the requirements of each grade group. There is some overlap between the grade groups in lunch; however, the calorie differences between the 6-8 and 9-12 grade groups can be challenging.

   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 only minor adjustments to the vegetables or fruits components to increase calories for the older students in grades 9-12. School Food Authority (SFAs) 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 meat/meat alternate components such that only the older students would take a second piece of bread, cheese, etc. This 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 meat/meat alternates daily.

1. **How is FNS assisting with implementation of the new meal requirements?**
FNS is helping State and local operators continue with implementation of the new meal requirements. We are providing training and technical assistance to State and local program operators through a variety of methods, including webinars, practical Q&A guidance, online and onsite training, publications, and online information. A wealth of resources is available to support successful implementation of the new meal requirements. These include:

- *Tools for Schools,* which is a comprehensive online resource to help schools continue their progress toward full implementation of new meal requirements. *Tools for Schools* is a one-stop guide for finding topic-specific policy and resource materials related to the meal pattern and dietary specifications. This online toolkit is a collection of policy, technical assistance, nutrition education, and training resources available to schools at no charge. It is available at: http://www.fns.usda.gov/healthierschoolday/tools-schools.
- Team Nutrition provides practical fact sheets and tips, in addition to technical assistance and nutrition education materials for foodservice professional, teachers, students, and parents. See http://www.fns.usda.gov/tn/team-nutrition.
- National Food Service Management Institute offers free online and onsite training on various aspects of the meal requirements and on successful foodservice operation. See http://www.nfsmi.org/Templates/TemplateDefault.aspx?qs=cElEPTU3.
- FNS professional standards webpage provides information on professional development opportunities for foodservice personnel. See http://professionalstandards.nal.usda.gov/.
- *Smarter Lunchrooms* techniques that encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. See the Cornell BEN Center website: http://smarterlunchrooms.org/.

FNS has also provided several flexibilities to help schools complete the meal pattern implementation in school year 2014-2015. The flexibility to incorporate grains and meats/meat alternates into the weekly menu is now permanent. Frozen fruit with added sugar and popular food items such as fruit smoothies are allowed to provide schools more options for menu planning. Our USDA Foods program now offers more fruits, vegetables, and whole grains than ever before, and all of these foods help schools meet the new requirements.

1. **How will State agencies monitor compliance with the new meal requirements?**
   State agencies will monitor compliance with the new NSLP and SBP requirements through administrative reviews (under Performance Standard 2). The final rule (77 FR 4088) ends the School Meals Initiative reviews previously authorized under 7 CFR 201.19, and amends 7 CFR 210.18 to include monitoring of the new meal requirements (meal patterns and dietary specifications) as part of the administrative reviews. School Food Authority (SFAs) are not required to conduct a nutrient analysis, but they must follow the new meal patterns to ensure children receive a well-balanced and nutritious meal.

2. **How many weeks of menus/production records must be reviewed?**
   State agencies will continue to assess compliance with the meal requirements based on documentation review, on-site observation and, for selected high-risk schools, a nutrient analysis of one week of menus.

3. **When does the new 3-year review cycle begin?**
   The 3-year administrative review cycle began SY 2013-2014. Please see the latest policy memoranda related to the administrative review process at: http://www.fns.usda.gov/school-meals/policy. State agencies may also view this information at the PartnerWeb, https://www.partnerweb.usda.gov/. For information about the administrative review manual, please see http://www.fns.usda.gov/cnd/guidance/adminreview.htm.

4. **How will State agencies determine if school food authorities have menus that meet the new requirements in order to receive the additional 6 cents reimbursement rate increase?**

   Requirements for certification of school food authorities for the 6 cents reimbursement are provided in the final rule, "Certification of Compliance with Meal Requirements for the National School Lunch Program under the Healthy, Hunger-Free Kids Act of 2010," 79 FR 325 published on January 3, 2014. Please refer to the certification webpage for additional information: http://www.fns.usda.gov/school-meals/certification-compliance

5. **How does the rule address compliance with the new meal patterns and dietary specifications?**

   Technical assistance and corrective action continue to be the key tools used by the State agencies to seek compliance with the new meal requirements. However, as currently done, State agencies must apply immediate fiscal action if the meals offered are completely missing a required food component. State agencies must also take fiscal action for repeated violations of the vegetable subgroup and milk type requirements. State agencies have discretion to take fiscal action for repeated violations of the food quantity and whole grain requirements, and for repeated violations of the dietary specifications (calories, saturated fat, sodium, and trans fat).

WEIGHTING, COMMERCIAL SOFTWARE, MULTIPLE SERVING LINES, PLANNED VS. OFFERED MEALS

1. **If there are multiple lines/choices of entree, are calories, fat, and sodium calculated based on an average of what is offered, each line individually, or a weighted average of what students are expected to take?**

   The calculation is a weighted average based on all foods offered as part of a reimbursable meal for the cafeteria over the course of one week. Although meal components must be offered in at least the minimum quantities on every serving line, it is not required that the nutrient analysis is conducted on a per line basis.

   If a State agency elects to conduct a line-by-line analysis, it may do so and provide additional technical assistance as indicated, but may not take fiscal action on a per line basis. Any fiscal action must be based on a nutrient analysis of all foods offered over a week.

2. **What is the difference between planned, offered, and selected/served?**

   Planned: A planned menu is what the menu planner intends to offer to students. It represents the School Food Authority's (SFA's) calculation of the items that will need to be prepared for a school's usual average daily participation (ADP). Ideally, the planned and the offered meals are the same.

   Offered: An offered menu is what is actually prepared and set out on the serving lines for students. Offered menus may differ from "planned" menus because, for example, a planned food item was not received from the distributor and the menu planner had to offer a different food item.

   Selected/Served: Selected or served refers to the foods that were actually served to, or selected by, students. Menu planners should use selected/served food item data to inform future menu planning (production records should be updated based on this data to reflect serving trends) and reduce food waste (i.e., so the school does not offer items that students do not select).

3. **Is the weighted nutrient analysis based on meals planned, offered or served?**

   The weighted nutrient analysis conducted by the State agency for a selected school at risk of violating the dietary specifications is based on the meals offered. A weighted nutrient analysis adjusts for student take rates and reflects what is recorded on the production record. It takes into account all foods *offered* over the course of the week, divided by the total weekly number of reimbursable meals offered, to determine the average daily amount for calories, saturated fat, and (beginning SY 2014/15) sodium.

4. **Are schools/SFAs required to purchase nutrient analysis software to prove they are meeting the calories, saturated fat, and sodium specifications?**

   No. Schools/SFAs are not required to conduct a nutrient analysis. They will receive technical assistance from the State agency to plan meals that are consistent with the meal

patterns and dietary specifications. However, schools/SFAs may choose to conduct a nutrient analysis to assist in their efforts to ensure they are meeting the dietary specifications.

For a school determined to be at risk for violating the dietary specifications, the State agency will conduct a nutrient analysis during the administrative review. State agencies must use USDA-approved nutrient analysis software and include in the analysis all foods offered as part of the reimbursable meals during the one week review period.

5. **Can a school/SFA purchase nutrient analysis software with funds from the non-profit school food service account?**

   Yes. However, only Nutrient Analysis Software Approved by USDA for Administrative Reviews is considered an allowable cost to the non-profit school food service account.

6. **How are self-served items, such as condiments, assessed for purposed of the nutrient analysis?**
   If a condiment that is not pre-portioned is offered, the menu planner or State reviewer will need to determine the average portion size selected by the students. To calculate the average portion selected, divide the total amount of a food item served on the menu (#10 cans of catsup, gallons of mayonnaise, etc.) by the number of applicable meals served that day. Under- or over-estimating the size of a self-serve portion can greatly affect the nutrient analysis.

1. **What nutrients must be included in the nutrient analysis report?**
   The nutrient analysis report must include calories, saturated fat (both in grams and percent of calories) and sodium because these are the nutrients that must be monitored by the State agencies through a nutrient analysis. These nutrients must be compared to the required dietary specifications for calories (minimum and maximum levels), sodium, and saturated fat. Trans fat does not need to be included in the nutrient analysis. If it is included, the trans fat value must not be used to determine if the menus meet the dietary specification for trans fat. State agencies must examine nutrition labels and manufacturer specifications to monitor trans fat in the food products and food ingredients used to prepare school meals.

2. **When software programs have missing nutrient values for trans fat, can the missing values be replaced with zeroes?**
   No. There is often confusion between missing nutrient data and zero values for nutrient data. If a value is missing, it cannot be assumed it is zero, even if it is likely that the item contains little or none of the nutrient. Missing nutrient data means that the value is unknown. Missing nutrient values or nutrient totals including missing nutrient values (for one or more items) must be marked as such in the approved software programs.
   These values are marked, so the user of nutrient analysis software can see that the total shown does not completely represent the amount of the nutrient in the food item, recipe, or menu. The user may then look at the items with missing values and decide if the total would likely be more or less based on which food items have missing values. It is inappropriate for a user to replace missing values with zeroes. A true zero value for a nutrient means that it does not contain any of the nutrient (or very little, as some zero values are based upon less than certain fractional amount for FDA labeling purposes).

3. **When are changes to the nutrient analysis software required?**
   The software developers of currently approved programs had one year (by July 1, 2013) to make the required changes. Software developers of previously approved programs were required to show they have made the changes related to the Final Rule before being moved to the list of Nutrient Analysis Software Approved by USDA for Administrative Reviews. New developers or new programs by current developers will need to be evaluated and approved before being added to this list.

4. **Will the Child Nutrition Database be modified to include both nutrients (i.e., calories, saturated fat, sodium, and trans fat) and meal component information (i.e., fluid milk, fruits, grains, meats, and vegetables)?**
   The Child Nutrition (CN) Database currently includes calories, saturated fat, sodium, and trans fat. There are no plans to include food pattern information in the CN Database.

5. **Will the use of approved nutrient analysis software apply only to State agencies?**

Only State agencies are required to complete the one-week nutrient analysis using an approved software program. However, schools may choose to use approved software to do their own nutrient analyses.

6. **Does USDA foresee approving software companies for Food-Based Menu Planning?**
   At this point, FNS does not have plans to require any food-based menu planning functionality.

FOOD BUYING GUIDE, RESOURCE SHARING

1. **Is the Food Buying Guide updated to reflect the new meal requirements?**
   We are updating the Food Buying Guide in segments. Most sections have already been updated and they are available at: http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs.

2. **Where can School Food Authority (SFAs) go to learn about ideas and resources generated by other SFAs?**
   SFAs and States can share resources and tools they use to serve healthy menus that meet the new school meal regulations by uploading information to the USDA Best Practice Sharing Center, http://healthymeals.nal.usda.gov/best-practices. Users can search by various topics such as Meal Pattern, Planning Tools, and Monitoring Tools. Users can also search by various formats, such as Menus, Recipes or Checklists. Materials may be submitted via email to hmrs@ars.usda.gov and should contain: the developer name, subject areas, audiences, and format that the resource covers.

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

1. **How do food manufacturers provide standardized claims about the quantities of meal components in a unique product recipe?**
   Crediting is determined by rounding the food component down to the nearest quarter ounce equivalency for the meat/meat alternate and grain components, and down to the nearest eighth (1/8) cup for the fruit and vegetable components.

2. **Currently, meats/meat alternates (M/MA) and grains are credited in quarter ounce equivalents (servings) and fruits and vegetables are credited in ⅛ cup increments. Will this change?**
   No. The minimum creditable amounts for meal components are not changing. Menu items must contribute at least quarter oz eq toward the M/MA and grain components and at least ⅛ cup toward the fruits and vegetables components.

3. **How do I use a CN labeled sherbet?**
   Sherbet and gelatin containing fruit juice do not credit in the NSLP because the child is not consuming a 100% full-strength juice (e.g., it is diluted with water, sugar, milk). There will continue to be a CN label on some products not creditable in the NSLP, such as sherbet and juice drinks, as they can currently still credit in other CN programs. Fruit pieces in gelatin are creditable based on volume as served.

4. **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 will be needed to determine the creditable amount of butternut squash, pumpkin, or tomato per serving. If this is a commercial item, a product formulation statement or CN label may be used to determine the creditable amount. School food authorities shall continue to use established guidance regarding tomato paste or purees for crediting found in the Food Buying Guide for Child Nutrition Programs.

5. **How are pureed fruits and vegetables credited?**
   The 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 currently in the Food Buying Guide (blackberries, plums, raspberries, tomatoes). For other foods, School Food Authority (SFAs) 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 for information about how to obtain in-house yield data.

6. **How are dried vegetables credited?**

The crediting of dried vegetables has not changed. Please refer to the Food Buying Guide for crediting information of specific vegetables. Dehydrated vegetables used for seasoning are not creditable.

7. **How are fresh soybeans (edamame) credited?**
   Fresh, green soybeans are creditable as beans/peas (legumes).

8. **Do peanuts and peanut butter count as legumes?**

   No. In accordance with existing regulations, peanuts and peanut butter are considered meat alternates and do not credit as a legume vegetable. Both food items are listed in Meats/Meat Alternate section of the Food Buying Guide.

9. **May a school district serve non-creditable meat/meat alternate or grain products, such as egg whites or drinkable yogurt?**

   Yes, these food items may be served as extra foods in the school meals but do not credit toward a reimbursable meal. Therefore, other meat/meat alternate and grain items must be offered in order to meet the component requirements for a reimbursable meal. In addition, because these are extra foods, they must be accounted for when assessing compliance with the weekly dietary specifications. Since the schools meals are intended to be the main source of nourishment during the school day, program operators are expected to limit the amounts of non-creditable foods offered.

10. **May food ingredients that are unrecognizable 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.

    For example, if a macaroni and cheese dish contains the minimum recognizable amount of vegetables (e.g., 1/8 cup of diced squash), the volume of unrecognizable vegetables (e.g., 1/8 cup of pureed carrots) may also be credited. In this example, the dish would provide a total of ¼ 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 cheese and/or meat included in pizza as topping.

    However, if the dish does not contain at least 1/8 cup of a recognizable component (in the above examples, vegetables) then the blended foods do not contribute to the meal requirements. The nutrition education aspect of the School Meal Programs is important and one of the goals of these Programs is to help children easily recognize the key food groups that contribute to a healthy meal.

11. Can pureed tomatoes in my vegetable soup receive credit toward the red/orange subgroup even if there are no recognizable red/orange vegetables in it?

Although it is encouraged as an educational tool for students that the pureed/unrecognizable and recognizable vegetables come from the same subgroup, this is not required. For instance, a serving of vegetable soup with 1/8 cup of pureed tomatoes (red/orange) and 1/8 cup onion pieces (other) can receive credit toward the red/orange vegetable subgroup.

12. If I add 1/8 cup of pureed white beans to Macaroni and Cheese, what component can it contribute to?

If there is at least 1/8 cup per serving of identifiable vegetables in the macaroni and cheese (such as 1/8 cup of diced tomatoes), the pureed white beans can be creditable as a legume vegetable. Conversely, the white bean puree could count toward the meat alternate requirement due to recognizable presence of cheese, a meat alternate, in the dish.

13. May pureed beans added to a brownie recipe be credited toward the vegetable or meat/meat alternate component?

No. While they can be added to enhance the nutritional profile of the brownie, the beans cannot be credited toward meal requirements, because brownies are considered a dessert item and do not serve as a meat/meat alternate in the meal. Improving the nutrient content of the foods children eat by disguising nutrient-rich vegetables and fruits in the food can be beneficial. However, it is not a menu planning principle that teaches and encourages children to recognize and eat a variety of healthy fruits and vegetables.

14. How should SFAs credit fruit that is a different size than listed in the Food Buying Guide (FBG)?

There are many commonly used portion sizes listed in the Food Buying Guide for Child Nutrition Programs. However, if SFAs are purchasing sizes not listed, they can do their own in-house yield study. Such a study does not need to be difficult and instructions on how to complete a yield study can be found on page A-5 in Appendix A of the Food Buying Guide (http://teamnutrition.usda.gov/resources/FBG_AppendixA.pdf).

15. Do cooked leafy greens that are served cooked (such as collard greens) count as half the volume served?

Leafy greens that are served raw count as half the volume served, while in their cooked form they credit as volume served.

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

Cilantro and parsley are both classified as dark green vegetables; therefore, ¼ cup would credit as 1/8 cup of dark green vegetables. Herbs in the Other subgroup, such as chives and garlic, credit as volume as served. SFAs 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 1/8 cup per portion) as a garnish or seasoning would not credit toward the vegetables component.

1. **Must a school place all food components that are part of the reimbursable meal before the Point of Service (POS)?**
   If a school is not able to position all food components (e.g., salad bar) prior to the POS, State agencies may authorize alternatives to the POS lunch counts. When food components/food items are located in an approved location beyond the POS, they must be labeled, listed on the menu, or otherwise identified so the students can easily identify all the components for a reimbursable meal and select the correct quantities. There must be a system in place to ensure that each reimbursable meal selected by the student under OVS includes a fruit or a vegetable (at least 1/2 cup).

2. **What must schools do to comply with the requirement to identify the reimbursable meal(s)?**
   The requirement is for School Food Authority (SFAs) to identify, near or at the beginning of the serving line and prior to the Point of Service, all of the food items that constitute a reimbursable meal at both breakfast and lunch. This is intended to assist students in selecting the meal components that comprise the reimbursable meal and in the appropriate quantities.

   The final rule, however, does not set specific requirements. State agencies and SFAs may establish requirements to fit their menu, facilities, layout and other considerations. Providing detailed information about the components, such as identifying the vegetable subgroups, is an excellent teaching tool, but is not required.

   Although all the foods that are a part of the reimbursable meal do not have to be adjacent to each other, 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. If some of the components of the reimbursable meal (such as the fruits and vegetables) are offered beyond the point of service, the school must ensure that students are aware that every reimbursable meal must include a fruit or a vegetable, and that the total of any fruit or vegetable item selected under OVS must equal at least 1/2 cup.

OTHER CHILD NUTRITION PROGRAMS

SUMMER FOOD SERVICE PROGRAM, SEAMLESS SUMMER OPTION, CACFP, PRE-K STUDENTS

1. **When should School Food Authority (SFAs) implement the new meal pattern for meals offered under the Summer Food Service Program (SFSP) and the Seamless Summer Option (SSO)?**
   SFAs operating the SSO or that have authority from the State agency to use the NSLP meal pattern in the SFSP must follow the NSLP meal pattern requirements, as applicable, that are in effect the school year prior to the summer meal service.

2. **How will SFAs implement the weekly requirements for meals in the Seamless Summer Option (SSO), where meals are not always served 5 days a week and where sites serve children of various ages?**

   SFAs participating in SSO should make every effort to follow the new meal pattern and offer age-appropriate meals. Please refer to FNS memo SP 39-2014 for additional guidance.

3. **Will the 6 cents reimbursement rate increase apply to SSO meals and how will those meals be certified for the rate increase?**

   Yes; SSO meals served by certified SFAs can receive the additional 6 cents reimbursement. Please refer to FNS memo SP 39-2014 for additional guidance on SSO operations.

4. **Do the new meal requirements apply to other Child Nutrition Programs such as the afterschool snack service, Special Milk Program, Child and Adult Care Food Program, or Summer Food Service Program?**
   No. The final rule meal patterns and dietary specifications are for the NSLP (Seamless Summer option included) and SBP. The meal pattern for the NSLP snack service has not been updated, but when offering milk, operators must offer only fat-free and low-fat milk (unflavored only) as required in the NSLP. For operational ease, milk variety is not required in the NSLP snack service.

   The restriction on milk fat established by this rule was extended to the Child and Adult Care Food Program (CACFP) though policy memoranda CACFP 21-2011–Revised (Sept. 15, 2011). For consistency across the Child Nutrition Programs, FNS encourages the use of fat-free and low-fat milk in the Summer Food Service Program.

   Fat-free milk and low-fat milk (unflavored only) must be offered in the Special Milk Program (SMP). The SMP requirements in 7 CFR 215 will be updated through a proposed rule to revise the CACFP meal patterns, which is in clearance. (Note: When the CACFP rule is implemented, it would also update the NSLP and SBP infant and Pre-K meal patterns. In the meantime, schools serving infants and Pre-K students must follow the meal patterns in section 210.10 and 220.8.)

PROCUREMENT GUIDANCE

1. **Is there guidance for School Food Authorities that may need to update their contracts with their FSMCs?**
   Yes, please refer to memo SP 17-2012, entitled "Procurement Questions and Answers to Assist in the Implementation of the Final Rule titled Nutrition Standards in the National School Lunch and School Breakfast Programs." This memorandum was issued February 23, 2012.