

## Section 8

# Lunch Meals

# Section 8, Lunch Meals

## Update Guide

December 7, 2023

Clarified guidance on the following:

- Milk meal pattern guidance for Ages 1-5
- Crediting information for Nixtamalized products to align with SP 34-2019

August 4, 2023

Clarified guidance on short and long week calculations

May 19, 2023

Clarified guidance on the following:

- Weekly whole-grain requirement
- Sodium limits for School Year 2023 - 2024
- Refusing an item

Created new *Definitions* and *Contact Information* sections, located at the beginning of the *Administrator's Reference Manual (ARM)*. Removed definitions and contact information from this section.

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# Lunch

The National School Lunch Program (NSLP) is a federally assisted meal program administered by the Texas Department of Agriculture (TDA) and operated by public schools, charter schools, nonprofit private schools, and residential child care institutions (RCCIs). The NSLP provides nutritionally balanced, economically priced, or free lunch to students each day. Contracting entities (CEs) that choose to participate in the NSLP receive reimbursement from the United States Department of Agriculture (USDA) for each lunch they serve. In return, CEs must serve lunches that meet the meal pattern requirements and offer free or reduced-priced meals to eligible students.

The guidance from the following *Administrator's Reference Manual (ARM)* sections will also be helpful in implementing the breakfast meal program:

- *Section 7, Breakfast Meals*
- *Section 9, Pre-Kindergarten Meals*
- *Section 14, USDA Foods*
- *Section 21, Meal Service*
- *Section 22, Competitive Foods*
- *Section 23, Food Product Labeling*
- *Section 25, Meal Accommodations*
- *Section 26, Food Safety*
- *Section 30, Record Retention*

## Meal Pattern

Under NSLP, lunches must meet regulations. The meal pattern outlined in the rule is food-based and divided by age/grade groups. The meal pattern focuses on specific nutrient standards: calories, sodium, and saturated and trans fat.

Regulations require the following:

- Five-component meal pattern: fruit, vegetables, grains, meat/meat alternate, and milk.
- A required daily serving of fruit.
- A required daily serving of vegetables plus a weekly requirement for Dark Green, Red/Orange, Beans/Peas (legumes), Starchy, and Other Vegetable subgroups.
- Increased quantities of fruits and vegetables.
- Weekly grain ranges plus minimum daily requirements. At least 80% of grains offered during the serving week must be whole-grain rich.
- Fat-free and 1 percent low-fat milk only. Either may be flavored or unflavored.
- Weekly meat/meat alternate ranges plus a daily requirement.
- Under Offer versus Serve (OVS), the student must select at least ½ cup of the fruit and/or the vegetable component to be considered a reimbursable meal.



- Calorie minimum and maximum levels based on age/grade groups.
- Sodium limits.
- Limit on saturated fat; the elimination of trans fat.

## Lunch Meal Pattern

The meal requirements are food-based and specify kinds and amounts of food for the five food components required for lunch. The *Nutrition Standards in the National School Lunch Program (NSLP)—Meal Pattern Chart* provides detailed information on the minimum meal pattern requirements for meals to be served for each age/grade group. Components must meet requirements for both daily and weekly servings. The nutrient specifications must be met weekly. This chart includes the requirements for pre-kindergarten students. See *Administrator's Reference Manual (ARM), Section 9, Pre-Kindergarten Meals* for detailed guidance on implementing the pre-K meal pattern.

The meal pattern is food-based and consists of five components:

- Fruit
- Vegetables (with five vegetable subgroups)
- Grains
- Meat/meat alternates
- Milk

The meal pattern is divided into four age/grade groups:

- Pre-Kindergarten students<sup>1</sup>
- Grades K–5 (ages 5–10)
- Grades 6–8 (ages 11–13)
- Grades 9–12 (ages 14–18)

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<sup>1</sup> CEs providing meals to pre-kindergarten students must use the pre-K meal pattern starting October 1, 2017.

Nutrition Standards in the National School Lunch Program (NSLP)—Meal Pattern Chart							
Minimum Amount of Each Food Component Per Week (Minimum Offering Per Day)							
Pre-Kindergarten (Pre-K) Lunch Daily			School Age Daily and Weekly				
Meal Pattern Components	Age 1-2	Age 3-5	Meal Pattern Components	Grades K–5	Grades 6–8	Grades K-8	Grades 9–12
Milk, Unflavored Age 1, whole milk Age 2-5, 1 percent low fat or fat free	(½) cup	(¾) cup	Milk, Unflavored or flavored fat free or 1 percent low fat	5 (1) cups	5 (1) cups	5 (1) cups	5 (1) cups
Fruits <sup>2</sup>	(⅛) cup	(¼) cup	Fruits	2½ (½) cups	2½ (½) cups	2½ (½) cups	5 (1) cups
Vegetables	(⅛) cup	(¼) cup	Vegetables	3¾ (¾) cups	3¾ (¾) cups	3¾ (¾) cups	5 (1) cups
			Dark Green	½ cup	½ cup	½ cup	½ cup
			Red/Orange	¾ cup	¾ cup	¾ cup	1¼ cups
			Beans/Peas (Legumes)	½ cup	½ cup	½ cup	½ cup
			Starchy	½ cup	½ cup	½ cup	½ cup
			Other	½ cup	½ cup	½ cup	¾ cup
Additional Vegetable	1 cup	1 cup	1 cup	1½ cups			
Grains, <sup>3</sup> Whole Grain-Rich or Enriched			Grains, 80% Whole Grain-Rich per week	8.0-9.0 (1.0) oz eq	8.0-10.0 (1.0) oz eq	8.0-9.0 (1.0) oz eq	10.0-12.0 (2.0) oz eq
Bread product such as biscuit, roll, or muffin	(0.5) oz eq						
Cooked breakfast cereal, cereal grain, <sup>4</sup> and/or pasta	(0.5) oz eq						
Meat/Meat Alternates <sup>5</sup>			Meat/Meat Alternates	8-10 (1) oz eq	9-10 (1) oz eq	9-10 (1) oz eq	10-12(2) ozeq
Lean meat, poultry, or fish	(1.0) oz eq	(1.5) oz eq	Other Nutrient Specifications: Daily Amount Based on the Average for a 5-Day Week				
Tofu, soy product, or alternate protein products	(1.0) oz eq	(1.5) oz eq	Min-Max Calories (kcal)	550-650	600-700	600-650	750-850
Cheese	(1.0) oz eq	(1.5) oz eq	Saturated Fat	< 10	< 10	< 10	< 10
Large egg	(1.0) oz eq	(1.5) oz eq	% of total calories				
Cooked dry beans or peas	(0.5) oz eq	(0.75) oz eq	Sodium Target (mg)	≤ 1110 mg	≤ 1225 mg	≤ 1110 mg	≤ 1280 mg
Peanut butter, soy nut butter, or other nut or seed butter	(1.1) oz eq	(1.7) oz eq	Trans Fat	Product nutrition label/manufacturer specification must indicate 0 grams of trans fat per serving.			
Yogurt, plain, or flavored unsweetened or sweetened	(4.0) oz eq	(6.0) oz eq					
Peanuts, soy nuts, tree nuts, or seeds	(0.5) oz eq	(0.75) oz eq					
<sup>1</sup> For K-12, one choice of milk must be unflavored at each meal service.							
<sup>2</sup> Juice must be full strength (100 percent juice) and may be used to meet the vegetable or fruit requirement at one meal per day, including snack. For pre-k, a vegetable may be used to meet the entire fruit requirement. When two vegetables are served at lunch or supper, two different kinds of vegetables must be served.							
<sup>3</sup> For pre-K, at least one serving per day, across all meals served must be whole grain-rich; remaining servings for the day must be enriched. Grain-based desserts (i.e., cereal bars, breakfast bars, granola bars, sweet rolls, sweet pie crusts, doughnuts, toaster pastries, cake, brownies, etc.) are not creditable toward meeting the grains requirement.							
<sup>4</sup> For pre-K, breakfast cereals must be at least 50% whole-grain rich, enriched, or fortified and contain no more than 6 grams of sugar per dry ounce (21.2 grams sucrose and other sugars per 100 grams of dry cereal).							
<sup>5</sup> Yogurt must contain no more than 23 grams of total sugars per 6 ounces. Any combination of peanuts, soy nuts, tree nuts, or seeds may be credited to meet 50% of the minimum amount to be served.							

The following chart may assist CEs as they determine the appropriate serving sizes based on different methods of measurement.

Measurement Conversion Chart								
(Converting Common Serving Portion Sizes into Applicable Measurement Methods) <sup>2</sup>								
Component			Other	Volume		Weight		Scoop Size (Scoop serving per quart)
				Level Measure (cup, Tbsp)	Fluid Ounce (fl oz)	Ounce (oz)	Ounce Equivalent (oz eq)	
Milk			--	1/2 cup	4	--	--	--
			--	3/4 cup	6	--	--	--
Fruits/Vegetables			--	1/4 cup	--	--	--	16
			--	1/2 cup	--	--	--	8
Grains	Bread Product: (biscuit, roll, muffin)		1/2 serving	--	--	0.5 oz	0.5 oz eq	--
	Cooked: Cereal, Cereal Grain, Pasta		--	1/4 cup	--	0.5 oz	0.5 oz eq	16
	Ready-To-Eat Breakfast Cereal (Dry /Cold)	Flakes/Rounds	--	1/2 cup	--	0.5 oz	0.5 oz eq	8
		Puffed	--	3/4 cup	--	1.0 oz	1.0 oz eq	4
		Granola	--	1/8 cup	--	0.5 oz	0.5 oz eq	30
Meat/ Meat Alternates	Lean meat, poultry, or fish		--	--	--	1.0 oz	1.0 oz eq	--
			--	--	--	1.5 oz	1.5 oz eq	--
	Tofu, soy product, or alternate protein products		--	1/8 cup	--	1.1 oz	0.25 oz eq	30
			--	1/3 cup	--	1.5 oz	0.33 oz eq	12
	Cheese		--	1/4 cup	--	1.0 oz	1.0 oz eq	16
			--	1/3 cup	--	1.5 oz	1.5 oz eq	12
	Large egg		1/2 serving	1/8 cup	--	--	1.0 oz eq	30
			3/4 serving	1/3 cup	--	--	1.5 oz eq	12
	Cooked dry beans or peas		--	1/4 cup	--	0.5 oz	1.0 oz eq	16
			--	3/8 cup	--	1.5 oz	1.5 oz eq	10
	Peanut butter, soy nut butter, or other nut or seed butter		--	2 Tbsp	--	1.1 oz	1.0 oz eq	30
			--	3 Tbsp	--	1.7 oz	1.5 oz eq	20
	Yogurt, plain, or flavored unsweetened or sweetened		--	1/4 cup	--	2.0 oz	0.5 oz eq	16
			--	1/2 cup	--	4.0 oz	1.0 oz eq	8
			--	3/4 cup	--	6.0 oz	1.5 oz eq	4
	Peanuts, soy nuts, tree nuts, or seeds		--	--	--	0.5 oz	1.0 oz eq	--
			--	--	--	0.75 oz	1.5 oz eq	--

## Lunch Menu Planning

To meet the requirements of the meal pattern, a reimbursable lunch must contain a specified quantity of each of the food components. The quantities for the food components vary by age/grade group. Refer to the *Nutrition Standards in the National School Lunch Program (NSLP)—Meal Pattern Chart* for information regarding specific quantities per age/grade group. Understanding the difference between components, food items, and menu items is essential when planning menus that meet requirements. The *Lunch Menu Planning Example Chart* provides examples of components, food items, and menu items.

<sup>2</sup> The *Child Nutrition Food Buying Guide* available at <http://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs> provides additional information on converting amounts.

Lunch Menu Planning Example Chart		
Components	Food Items	Menu Items
1. Meat/Meat Alternates	1. Chicken	1. Southwest Baked Chicken
2. Fruit	2. Peaches	2. Fresh Fruit of the Day
3. Vegetable (Dark Green)	3. Spinach	3. Seasoned Spinach
4. Grains	4. Whole Wheat Roll	4. Roll
5. Milk	5. Fat-Free Milk	5. Unflavored Milk or Chocolate Milk

### Food Component

A food component<sup>3</sup> means one of the five food groups—meat/meat alternates, fruit, vegetable, grains, and fluid milk—that make up a reimbursable lunch meal. A minimum of five food components must be offered prior to the point of service (POS)<sup>4</sup> to meet requirements for a reimbursable meal.

### Food Items

Food items mean a specific food offered that contains one or more of the five lunch food components.

### Menu Items

Menu items are the actual foods served such as potato casserole, grilled chicken, or fresh apples. Menu items may contain one or more components or food items.<sup>5</sup> The *Lunch Menu Planning Example Chart* provides examples of components, food items, and menu items.

Whether a menu item consists of one or more components, all five required food components must be offered in the required amount for the meal to be reimbursable. All menu items should be offered prior to the POS.<sup>6</sup>

While a menu item may contain only one food component as shown in the *Menu Planning Chart*, a menu item may also contain two or more food components by combining food items as shown in the *Lunch Menu Planning Chart—Multiple Components in One Menu Item Chart*. All menu items must be offered prior to the POS.

<sup>3</sup> For lunch there are five components.

<sup>4</sup> See *Administrator's Reference Manual (ARM), Section 21, Meal Service* for additional information on this topic.

<sup>5</sup> See the *Reimbursable Lunch Requirements* subsection in this section for additional information on combined food items.

<sup>6</sup> See the *Administrator's Reference Manual (ARM), Section 21, Meal Service* for additional information on this topic.

Lunch Menu Planning Chart—Multiple Components in One Menu Item Chart		
Components	Food Items	Menu Item
<ul style="list-style-type: none"> <li>• 1.0 oz eq, Meat/Meat Alternate</li> <li>• 1/8 cup, Other vegetable</li> <li>• 1/8 cup, Red/Orange vegetable</li> <li>• 1.5 oz eq, Whole-grain rich grain</li> </ul>	<ul style="list-style-type: none"> <li>• Beef patty</li> <li>• Lettuce</li> <li>• Tomato</li> <li>• Bun</li> </ul>	<ul style="list-style-type: none"> <li>• Hamburger</li> </ul>
<ul style="list-style-type: none"> <li>• 1.5 oz eq, Meat/Meat Alternate</li> <li>• 1/4 cup, Dark Green vegetable</li> <li>• 1/8 cup Red/Orange vegetable</li> <li>• 1.0 oz eq Grains</li> </ul>	<ul style="list-style-type: none"> <li>• Ground beef</li> <li>• Cheese garnish</li> <li>• Spinach</li> <li>• Tomato</li> <li>• Taco shell</li> </ul>	<ul style="list-style-type: none"> <li>• Spicy Tacos</li> </ul>
<ul style="list-style-type: none"> <li>• 1/4 cup Fruit: apple</li> <li>• 1/8 cup Fruit: raisins</li> <li>• 1/4 cup Grain: oat and whole grain</li> </ul>	<ul style="list-style-type: none"> <li>• Apple</li> <li>• Raisins</li> <li>• Oatmeal &amp; whole grain topping</li> </ul>	<ul style="list-style-type: none"> <li>• Apple Surprise</li> </ul>

## Crediting Foods

Crediting is determined by rounding the food component down to the nearest

- 0.25 ounce equivalent (oz eq) for the grain and meat/meat alternate components
- or
- 1/8 cup for fruit, vegetable, and milk components.

## Age/Grade Groups

The meal pattern is divided into three age/grade groups:

- Grades K–5 (ages 5–10)
- Grades 6–8 (ages 11–13)
- Grades 9–12 (ages 14–18)

CEs must use the meal pattern age/grade groups to plan the menus. Because of the three distinct age/grade groups, CEs cannot offer the same meal portions to all grade levels. In cases where a CE has an unusual grade configuration for grades K–8 that prevents the use of the required age/grade groups, it may serve the same lunch to students in grades K–8 as requirements across these age/grade groups overlap.

However, in these cases, the CE must be careful to meet the calorie requirements for each age/grade group. The CE must meet the lower age/grade group sodium standard when serving meals to more than one age/grade group.

CEs with sites with students in both age/grade groups 6–8 and 9–12 must serve different meal portion sizes for each age/grade group. No customization of the age/grade group in the meal pattern is allowed across these age/grade groups.

[NOTE: CEs are allowed to offer age-appropriate meals to individual students in unique situations.

For Example: A 16-year old student placed in a K–5 educational setting can be served portion sizes for age/grade group 9–12. This may also apply to students with an Individualized Education

Plan (IEP). A CE must follow the IEP for any student that has one.]<sup>7</sup>

## Residential Child Care Institutions

Residential child care institutions (RCCIs) are not waived from the meal pattern requirements, including the nutrient standards.<sup>8</sup> To meet the caloric needs of students in RCCIs, the menu planner may increase the calories provided through other meal services such as snacks and the supper meal. If it is not possible to use the established age/grade groups, RCCI CEs do have some flexibility. See the *Administrator's Reference Manual (ARM)*, Section 28, *Residential Child Care Institutions*, for additional information on this topic.

## Menu Planning for Pre-Kindergarten (Pre-K) Students

CEs must implement the updated Child and Adult Care Food Program (CACFP) pre-kindergarten (pre-K) meal pattern which is described on the *Nutrition Standards in the School Lunch Program (NSLP)—Meal Pattern Chart*.

However, while CEs are required to implement the pre-K meal pattern for NSLP pre-K students beginning, other CACFP requirements do not apply unless a site is also operating CACFP At-Risk or a CACFP Center.

See *Administrator's Reference Manual (ARM)*, Section 9, *Pre-Kindergarten Meals* or the *Child and Adult Care Food Program—Child Care Centers Handbook* for detailed information on the pre-K meal pattern.<sup>9</sup>

## Weekly Menu Planning

The weekly range requirement applies to both the grains and meat/meat alternate components. For menu planning purposes, CEs must offer a weekly menu so that the sum of all minimum daily offering meets at least the weekly minimum requirement. For grades K–5 and 6–8, the daily grains minimum is only 1.0 oz eq and the weekly grains minimum is 8.0 oz eq. Offering a minimum of only 1.0 oz eq daily would only total 5.0 oz eq across the week.

Therefore, on some days, CEs must offer more than 1.0 oz eq of grains as a minimum offering. The same applies to the weekly minimum amount of meat/meat alternates.

For Example: A menu planner has created a menu that gives age/grade K-5 students two options every day: a 1.0 oz eq grain item (crackers with a salad) or a 2.0 oz eq grain item (pizza). Each student is instructed to select one option only.

For the 1.0 oz eq daily option, the total weekly grains offered is 5.0 oz eq (1.0 oz eq x 5 days = 5.0)	For the 2.0 oz eq daily option, the total weekly grains offered is 10.0 oz eq (2.0 x 5 days = 10.0)
This option <u>does not</u> meet the minimum weekly grains requirement of 8.0 oz eq for age/grade group K–5.	This option <u>does</u> meet the minimum weekly grains requirement of 8.0 oz eq for age/grade group K–5.

Because the lowest weighing menu option for the week offers less than 8.0 oz eq over the period of a week, this menu does not meet the required weekly minimum.

<sup>7</sup> See *Administrator's Reference Manual (ARM)*, Section 25, *Meal Accommodations* for more information on this topic.

<sup>8</sup> See the *Administrator's Reference Manual (ARM)*, Section 28, *Residential Child Care Institutions*, for additional information on this topic.

<sup>9</sup> Available at [www.SquareMeals.org](http://www.SquareMeals.org)

CEs should also plan their menus so that the sum of the daily recommended maximum offerings<sup>10</sup> for grains and meat/meat alternates is equal to or less than the weekly recommended maximum offerings in order to meet the weekly dietary specifications. Therefore, the sum of minimum daily offerings must meet the weekly minimum requirement, and the sum of the daily recommended maximum offerings should not exceed the weekly recommended maximum offerings.

For Example: A menu planner for an age/grade 9–12 site offers a variety of grains each day from which students may choose a grain item. Each day the largest grain option offered is 2.0 oz eq grain item. Even though there are lower weighted grain options offered during the week, the menu planner uses the highest weighted grain option to determine the maximum grain servings for the week. When the site offers 2.0 oz eq each day, the total for the week would be 10.0 oz eq. This menu would not exceed the recommended maximum weekly of 12.0 oz eq.

### CEs with Shorter and Longer Weeks

Since the dietary specifications are based on average daily amounts, these are unaffected by varying week lengths (average over length of week, whether consisting of 3 to 7 days).

CEs that regularly and consistently serve lunch more than five days per week must increase the weekly component quantities by 20 percent ( $\frac{1}{5}$ ) for each additional day. Similarly, CEs that regularly and consistently serve lunch less than five days per week must decrease the weekly component quantities by 20 percent ( $\frac{1}{5}$ ) for each day less than five.

However, due to the size of weekly vegetable subgroup requirements, the 20% adjustment is not practical. Therefore, adjustments are primarily made to the “Additional Vegetable” category only- which in turn allows increased or decreased offering amounts of any of the subgroups to meet this requirement.

The *Short and Long Week Adjustments for Lunch Chart* provides detailed information for planning menus for shorter and longer weeks.

For CEs with occasional decreases in the week length because of holidays, snow days, etc., the menus do not have to be adjusted. However, menu planners must plan their menus in a way that is consistent with the intent of the meal patterns. CEs should make sure they do not consistently fail to offer certain grains in portions that would exceed the weekly recommended ranges or menus that consistently eliminate required vegetable subgroups.

Short and Long Week Adjustments for Lunch Chart*			
	Grades K–5 Weekly (Daily)	Grades 6–8 Weekly (Daily)	Grades 9–12 Weekly (Daily)
Three-Day School Week			
Fruits (cups)	1½ (½)	1½ (½)	3 (1)
Vegetables (cups)	2¼ (¾)	2¼ (¾)	3 (1)
Dark Green	½	½	½
Red/Orange	½	½	1
Beans/Peas (Legumes)	½	½	½
Starchy	½	½	½
Other	¼	¼	½
Additional Vegetables to Reach Total	0	0	0
Grains (oz eq)	5.0–5.5 (1.0)	5.0–6.0 (1.0)	6.0–7.0 (2.0)

<sup>10</sup> USDA has waived the maximum serving amounts for grains and meat/meat alternates.



Short and Long Week Adjustments for Lunch Chart*			
	Grades K–5 Weekly (Daily)	Grades 6–8 Weekly (Daily)	Grades 9–12 Weekly (Daily)
<b>Meat/Meat Alternates</b> (oz eq)	5.0–6.0 (1.0)	5.5–6.0 (1.0)	6.0–7.0 (2.0)
<b>Milk, Fluid</b> (cups)	3 (1.0)	3 (1.0)	3 (1.0)
<b>Four-Day School Week</b>			
<b>Fruits</b> (cups)	2 (1/2)	2 (1/2)	4 (1)
<b>Vegetables</b> (cups)	3 (3/4)	3 (3/4)	4 (1)
<b>Dark Green</b>	1/2	1/2	1/2
<b>Red/Orange</b>	3/4	3/4	1 1/4
<b>Beans/Peas</b> (Legumes)	1/2	1/2	1/2
<b>Starchy</b>	1/2	1/2	1/2
<b>Other</b>	1/2	1/2	3/4
<b>Additional Vegetables to Reach Total</b>	1/4	1/4	1/2
<b>Grains</b> (oz eq)	6.5 –7.0 (1.0)	6.5 –8.0 (1.0)	8.0–9.5 (2.0)
<b>Meat/Meat Alternates</b> (oz eq)	6.5–8.0 (1.0)	7.0–8.0 (1.0)	8.0–9.5 (2.0)
<b>Milk</b> (cups)	4 (1.0)	4 (1.0)	4 (1.0)
<b>Six-Day School Week</b>			
<b>Fruits</b> (cups)	3 (1/2)	3 (1/2)	6 (1)
<b>Vegetables</b> (cups)	4 1/2 (3/4)	4 1/2 (3/4)	6 (1)
<b>Dark Green</b>	1/2	1/2	1/2
<b>Red/Orange</b>	3/4	3/4	1 1/4
<b>Beans/Peas</b> (Legumes)	1/2	1/2	1/2
<b>Starchy</b>	1/2	1/2	1/2
<b>Other</b>	1/2	1/2	3/4
<b>Additional Vegetables to Reach Total</b>	1 3/4	1 3/4	2 1/2
<b>Grains</b> (oz eq)	9.5 –11.0(1.0)	9.5 –12 (1.0)	12.0–14.5 (2.0)
<b>Meat/Meat Alternates</b> (oz eq)	9.5–12.0 (1.0)	11.0–12.0 (1.0)	12.0–14.5 (2.0)
<b>Milk</b> (cups)	6 (1.0)	6 (1.0)	6 (1.0)
<b>Seven-Day School Week</b>			
<b>Fruits</b> (cups)	3 1/2 (1/2)	3 1/2 (1/2)	7 (1)
<b>Vegetables</b> (cups)	5 1/4 (3/4)	5 1/4 (3/4)	7 (1)
<b>Dark Green</b>	1/2	1/2	1/2
<b>Red/Orange</b>	3/4	3/4	1 1/4
<b>Beans/Peas</b> (Legumes)	1/2	1/2	1/2
<b>Starchy</b>	1/2	1/2	1/2
<b>Other</b>	1/2	1/2	3/4
<b>Additional Vegetables to Reach Total</b>	2 1/2	2 1/2	3 1/2
<b>Grains</b> (oz eq)	11.0–12.5 (1.0)	11.0–14.0 (1.0)	14.0–17.0 (2.0)
<b>Meat/Meat Alternates</b> (oz eq)	11.0–14.0 (1.0)	12.5–14.0 (1.0)	14.0–17.0 (2.0)
<b>Milk</b> (cups)	7 (1)	7 (1)	7 (1)
These calculations are rounded to the nearest 0.5 oz eq and 1/4 cup.			

## CEs with Multiple Age/Grade Groups

Some CEs include pre-kindergarten (pre-K) students as well as students in other age/grade groups in their lunch meal service. CEs that operate half-day pre-K programs may choose to serve pre-K students both breakfast and lunch or only one of these meals.



See *Administrator's Reference Manual (ARM), Section 9, Pre-Kindergarten Meals* or the *Child and Adult Care Food Program—Child Care Centers Handbook* for additional information on the pre-K meal pattern.<sup>11</sup>

### Overlapping Age/Grade Groups

If a K–8 site is unable to effectively offer different meal patterns for the K–5 students and the grade 6–8 students, the CE 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.

However, in order to accommodate the average daily nutrient limits and weekly required minimums and recommended maximum offerings for both grains and meat/meat alternates, CEs should work within the following parameters:

- Eight to nine (8.0–9.0) oz eq grains per week
- Nine to ten (9.0–10.0) oz eq meat/meat alternates per week
- Average daily calorie range of 600–650 per week
- Average daily sodium limit of  $\leq 1230$  mg per week

For Example: The CE would have to offer 8.0–9.0 oz equivalent of grains and 9.0–10.0 oz equivalent of meat/meat alternates to all students to meet the requirements for age/grade groups K–5 and 6–8. In addition, the meals offered to these students must consist of 600–650 calories to meet the nutrient standards for both groups. Also, the sodium content of these meals must meet the sodium specifications for the youngest group: grades K–5.

### Non-Overlapping Menus for Age/Grade Groups

Menu planners must plan separate menus for age/grade groups 6–8 and 9–12 when grades 6–8 and 9–12 are located at a single site. The meal pattern does not allow for sites with a grade configuration with one grade above or below the age/grade grouping to follow the predominant age/grade group requirements, which was allowed in previous years. CEs may offer the same menu items to varied age/grade groups, but the portion size served to each student must match the student's age/grade group. See the *Residential Child Care Institutions* subsection in this section for additional information on age/grade requirements specific to RCCIs as well as the *Administrator's Reference Manual (ARM), Section 28, Residential Child Care Institutions*.

### Strategies for Mixed Age/Grade Groups

One way to ease menu planning for CEs with grades 6–8 and 9–12 at one site is to start with a menu that is appropriate for grades 6–8 and then add in additional foods and larger portion sizes to meet the meal pattern requirements for the 9–12 age/grade group.

Therefore, on top of the requirements for the 6–8 age/grade group, CEs must make the following available to the students in age/grade group 9–12:

- One-half ( $\frac{1}{2}$ ) cup more fruit daily
- One-quarter ( $\frac{1}{4}$ ) cup more vegetables daily and throughout the week
  - One-half ( $\frac{1}{2}$ ) cup more Red/Orange vegetables
  - One-quarter ( $\frac{1}{4}$ ) cup more of Other vegetables

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<sup>11</sup> Available at [www.SquareMeals.org](http://www.SquareMeals.org)

- One-half (1/2) cup more additional vegetables (any subgroup)

Another option is to make the full 1 cup fruit and vegetables required for grades 9–12 available to both the 6–8 and 9–12 age/grade groups. There is no maximum requirement for the fruit and vegetable components. The site would use the same menu plan for these two food components, as long as these offerings do not exceed the calorie limit for the 6–8 age/grade group.

For Example: A CE can offer a salad bar to all students. Or, to meet the additional calorie needs of the 9–12 age/grade group, the site could consider an additional ounce equivalent (oz eq) of grain or meat/meat alternate to be served to the older students (e.g., additional bread options or a larger entrée serving size).

## Fruit and Vegetable Components of the Reimbursable Lunch

The *Fruit and Vegetable Components of the Reimbursable Lunch Chart* provides the required daily and weekly servings for these components.

Fruit and Vegetable Components of the Reimbursable Lunch Chart			
Amount of Fruits and Vegetables Per Week (Minimum Per Day)			
Component	Grades K–5	Grades 6–8	Grades 9–12
<b>Fruits</b> (cups) <sup>b</sup>	2½ (1½)	2½ (1½)	5 (1)
<b>Vegetables</b> (cups) <sup>b</sup>	3¾ (¾)	3¾ (¾)	5 (1)
<b>Dark Green</b> <sup>c</sup>	½	½	½
<b>Red/Orange</b> <sup>c</sup>	¾	¾	1¼
<b>Beans/Peas</b> (Legumes) <sup>c</sup>	½	½	½
<b>Starchy</b> <sup>c</sup>	½	½	½
<b>Other</b> <sup>c, d</sup>	½	½	¾
<b>Additional Vegetable to Reach Total</b> <sup>e</sup>	1	1	1½
<sup>a</sup> Food items included in each food group and subgroup and amount equivalents. Minimum creditable serving amount is 1/8 cup. <sup>b</sup> One-quarter cup of dried fruit counts as 1/2 cup of fruit; 1 cup of leafy greens counts as 1/2 cup of vegetables. No more than one half of the fruit or vegetable offerings over the course of the week may be in the form of juice. All juice must be 100% full-strength. <sup>c</sup> Larger amounts of these vegetables may be served. <sup>d</sup> This category consists of Other Vegetable as defined in regulations. The Other Vegetable requirement may be met with any additional amounts from the Dark Green, Red/Orange, and Beans/Peas (Legumes) vegetable subgroups. <sup>e</sup> Any vegetable subgroup may be offered to meet the total weekly vegetable requirement.			

Full-strength vegetable/fruit juice may not be used to meet more than one-half of the vegetable or fruit requirements over the course of the week. Any product, either liquid or frozen, labeled juice, full-strength juice, single-strength juice, or reconstituted juice is considered full-strength juice.

If juice offerings are a combination of 100% fruit and 100% vegetable juices, the CE must count the juice as

a fruit serving if the first ingredient is a fruit juice	or	a vegetable serving if the first ingredient is a vegetable juice.
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Over the course of the serving week, CEs must offer all vegetable subgroups:<sup>12</sup>

- **Dark Green**, such as bok choy, broccoli, collard greens, kale, mustard greens, romaine lettuce, spinach, turnip greens, and watercress
- **Red/Orange**, such as acorn squash, butternut squash, carrots, pumpkin, tomatoes, tomato juice, and sweet potatoes
- **Dry Beans/Peas (Legumes)**, such as black beans, garbanzo beans, lentils, kidney beans, mature lima beans, navy beans, pinto beans, refried beans, and split peas
- **Starchy**, such as corn, cassava, green bananas, green peas, green lima beans, plantains, taro, water chestnuts, and white potatoes
- **Other Vegetable**, which includes all other fresh, frozen and canned vegetables, such as artichokes, asparagus, avocado, bean sprouts, beets, Brussels sprouts, cabbage, cauliflower, celery, cucumbers, eggplant, green beans, green peppers, iceberg lettuce, mushrooms, okra, onions, parsnips, turnips, wax beans, and zucchini.

The category for any unusual vegetables may be found at the following links:

- USDA's *ChooseMyPlate* website at available at [www.choosemyplate.gov/](http://www.choosemyplate.gov/).
- USDA's *Item Clusters, Percent of Consumption, and Representative Foods for 2010 USDA Food Patterns* at available at [https://fns-prod.azureedge.net/sites/default/files/usda\\_food\\_patterns/ItemClustersAndRepFoods.pdf](https://fns-prod.azureedge.net/sites/default/files/usda_food_patterns/ItemClustersAndRepFoods.pdf).

## Crediting Fruits and Vegetables

The minimum creditable amount of a fruit or vegetable that may be credited toward the meal pattern is  $\frac{1}{8}$  cup. Under OVS,  $\frac{1}{2}$  cup is the minimum amount of fruits, vegetables, or combination of fruit and vegetables that a student must be served (or select if OVS) for a reimbursable lunch.

[NOTE: A student who is served a plated meal must be served the required minimum offering for each component but may request and be given a smaller portion size of any item. If the student takes a smaller portion size of any item, the remaining amount must meet the requirements described in the *Reimbursable Lunch Requirements* subsection in this section.]

Crediting Fruits and Vegetables for a Reimbursable Meal Chart	
Minimum Creditable Amount of Fruits (or Vegetables) Taken by a Student	Minimum Portion Size or Amount of Fruits (or Vegetables) Taken by a Student
<b><math>\frac{1}{8}</math> Cup</b>	<b><math>\frac{1}{2}</math> Cup</b>
<b>How Creditable Amount Is Used...</b>	<b>How Minimum Portion Size or Amount Is Used...</b>
A creditable amount <u>contributes toward</u> meeting the minimum serving portion <u>size or amount</u> .	A minimum serving portion size or amount <u>counts toward</u> meeting the minimum food component requirements for a <u>reimbursable meal</u> .

The creditable amount may be reached by combining different fruits and vegetables to reach a  $\frac{1}{2}$  cup serving amount.<sup>13</sup>

<sup>12</sup> The *Food Buying Child for School Nutrition Programs* provides detailed information on crediting mixed vegetable products, available at [www.fns.usda.gov/tm/food-buying-guide-school-meal-programs](http://www.fns.usda.gov/tm/food-buying-guide-school-meal-programs).

<sup>13</sup> See the *Reimbursable Lunch Requirements* subsection in this section for additional information.

For Example: In an OVS service, the student takes a fruit/vegetable mix that contains  $\frac{1}{8}$  cup apples,  $\frac{1}{8}$  cup oranges,  $\frac{1}{8}$  cup grapes, and  $\frac{1}{8}$  cup avocado. The total fruit/vegetable mix is  $\frac{1}{2}$  cup.

There are no maximum limits (daily or weekly) on the amount of fruit or vegetable subgroups offered at lunch. However, CEs must offer at least the minimum quantities of all the vegetable subgroups weekly required in the NSLP meal pattern and ensure that they do not exceed the specific calorie limit requirements.

#### **Non-Creditable Amount of Fruit or Vegetable**

Small amounts (less than  $\frac{1}{8}$  cup) of fruits or vegetables used for flavoring or as an optional ingredient for a garnish must not be counted toward the vegetable or fruit component requirement.

CEs will find that the updated *Food Buying Guide for Child Nutrition Programs*<sup>14</sup> will provide detailed information on the amount of fruit needed for a creditable amount.

#### **Order of Serving Vegetables During the Week.**

CEs are not required to offer the vegetable subgroups at lunch in any specific sequence during the week. The menu planner decides when and how to offer the required vegetable subgroups. Salad bars are a great way to offer the vegetable subgroups.<sup>15</sup>

CEs may offer the same vegetable subgroup multiple times throughout the week in small amounts to add up to the required amount for the week. CEs may break up each subgroup requirement across the week as long as the week's menu as a whole meets the full subgroup requirements, and each day the CE offers the full daily vegetable minimum requirement.

For Example: To achieve the  $\frac{1}{2}$  cup weekly bean/pea (legume) requirement,

- One day a CE offers a  $\frac{1}{2}$  cup of bean/corn salsa that includes  $\frac{1}{4}$  cup of beans per serving.
- Another day, the CE offers a 1 cup of black bean soup that includes  $\frac{1}{4}$  cup of black beans per serving.

In this example, the CE would meet the Beans/Peas (Legumes) vegetable subgroup for the week— $\frac{1}{2}$  cup for all age/grade groups. However, this example assumes that the CE is providing additional vegetables with each of these meals to meet the minimum daily requirement for the vegetable component.

#### **Offer Versus Serve (OVS) and the Fruit and Vegetable Components**

Under OVS, CEs must offer enough servings for each student to take the full minimum daily requirement for each component.<sup>16</sup> For a reimbursable meal, a student must be offered at least 1 cup of either fruit or vegetables or a combination of fruit and vegetables and must take at least  $\frac{1}{2}$  cup of fruit or vegetables for a reimbursable meal. For additional information on OVS and fruits and vegetables, see the *Reimbursable Lunch Requirements* subsection in this section.

#### **Multiple Serving Lines**

CEs with multiple serving lines with different menu items must offer all the vegetable subgroups each week on each serving line. This strategy ensures that all students have access to all of the vegetable subgroups throughout the week regardless of the serving line selected by the student.

For Example: A student who consistently selects the pizza line would have access to all the

<sup>14</sup> Available at [www.fns.usda.gov/tn/food-buying-guide-school-meal-programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).

<sup>15</sup> See *Recipes for Salad or Theme Bars* subsection in this section for additional information.

<sup>16</sup> See the *Fruit and Vegetable Components for Reimbursable Lunch Chart* subsection in this section for daily requirements by age/grade groups

vegetable subgroups on the pizza line throughout the week. Another option would be to offer a salad bar centrally located so that all students can access it more easily.

## Crediting Fruits

CEs may offer the following types of fruits:

- Fresh
- Frozen, based on volume prior to freezing
- Canned in light syrup, water, or fruit juice
- Dried
- One hundred percent fruit juice, frozen or liquid

These types of fruits may be used interchangeably. To aid in the absorption of iron from bread and cereal products, it is recommended that a fruit high Vitamin C be offered daily.

### Coconut

Fresh, frozen, and 100% coconut juice are creditable by volume. Dried coconut is credited toward the fruit component at twice the volume served. When served as a food component, the minimum creditable amount to be served is  $\frac{1}{8}$  cup.

Coconut Water labeled as 100% coconut use is creditable by volume.

Coconut flour and coconut oil are not creditable.

### Dried Fruit

Whole dried fruit and whole dried fruit pieces credit at twice the volume served.

For Example: A  $\frac{1}{4}$  cup of raisins contributes  $\frac{1}{2}$  cup fruit toward the fruit requirement.

Dried fruit processed with sugar to keep the fruit pieces separated may credit toward a reimbursable meal.

### Frozen Fruit with Added Sugar

CEs may continue to serve frozen fruit with added sugar. However, frozen fruits with added sugar should be used in moderation to keep the average school meal within the weekly calorie ranges.

### Fruit Desserts

The fruit in a dessert can credit toward the fruit component, regardless of whether there is added sugar in the recipe or not. However, sites should offer sweetened fruit in moderation to stay under the weekly calorie maximum.

#### Non-Grain-Based Desserts

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.

#### Grain-Based Desserts

A CE can offer 2.0 oz eq of a grain-based dessert over the course of a week—offering a small portion on several days that equals the weekly total of 2.0 oz eq or the entire 2.0 oz eq on a single day.

For grain-based desserts, such as pies, cobblers, or crisps, the following crediting guidance applies:

- The fruit portion of the grain-based dessert may credit toward the

fruit component. The fruit may be fresh, dried, or canned in 100% juice, light or extra light syrup.

- The grain portion (e.g., crust) may credit toward the grains component.

CEs may add a vegetable or fruit to a dessert item to enhance the nutritional profile of the dessert. However, adding a component to a dessert does not make the dessert creditable for a reimbursable meal. It is an extra food item that must be included in the dietary specifications for the week.

See the *Fruit Dessert* subsection in this section for more information on the limitations for crediting formulated grain products.

### Fruit (or Vegetables) in Gelatin

Fruit (or Vegetables) pieces in gelatin are creditable based on volume of the fruit or vegetable pieces as served. If juice is also added to gelatin, the juice only credits if there is visible fruit or vegetables in the gelatin.

## Crediting Vegetables

### 100% Vegetable Flour

Pasta made with 100% vegetable flour is creditable as a vegetable component by volume even if the pasta is not served with another recognizable vegetable. However, small amounts of vegetable powder included in grain-based products to add color (spinach, sun-dried tomato) are not creditable toward the vegetable component.

- When served as the vegetable component, pasta made with 100 percent vegetable flour is credited by volume and must be included in the weekly dietary specifications.
  - ½ cup of pasta made with 100% vegetable flour credits as ½ cup of vegetables.
- When the vegetable flour from one vegetable subgroup is used to make the pasta, the pasta credits toward the appropriate vegetable subgroup.
- When the vegetable flour from more than one vegetable subgroup is used to make the pasta, the pasta credits in one of two ways:
  1. When a product formulation statement details the actual volume of each vegetable (subgroup) per serving, the pasta product may credit toward the vegetable subgroups as long as the minimum creditable amount for each subgroup is served.
  2. When the vegetable subgroup contributions are not known, the product may credit toward the additional vegetable subgroup.
- When a food item is made from vegetable flour and other non-vegetable ingredients, the pasta made from vegetable flour may be credited toward the appropriate vegetable subgroup if a product formulation statement provides the contribution information for the actual volume of vegetable flour per serving.

### Dry Peas and Beans

Dry or mature beans and peas may be offered as a meat alternate or as a vegetable, at the discretion of the menu planner. One serving may not count toward two different food components in the same meal. However, two different servings may count as two separate components: vegetable and meat/meat alternates.



For Example: One serving of refried beans can be offered as a vegetable in one meal. This serving of refried beans offered as a vegetable counts toward the weekly Beans/Peas (Legumes) requirement, but not toward the meat/meat alternate weekly range in that same meal.

Two servings of refried beans can be menued as both a vegetable and a meat/meat alternate. A ½ cup of beans incorporated into a burrito and 1 cup serving of beans may be offered as a vegetable.

For additional guidance on beans and peas, see: [www.choosemyplate.gov/](http://www.choosemyplate.gov/) for the *Food Buying Guide for Child Nutrition Programs*.<sup>17</sup>

### Extruded Vegetable Products

Meal pattern contributions of extruded vegetable products can be found in the *Food Buying Guide for Child Nutrition Programs*.<sup>18</sup> For any food item not listed in the guide, a manufacturer's product formulation statement should be used to determine the contribution extruded products make toward the meal pattern requirement.<sup>19</sup>

### Herbs as Vegetables

A one-fourth (¼) cup garnish of herbs that are classified as Dark Green vegetables, such as parsley and cilantro credit as ⅛ cup of Dark Green vegetables. A one-fourth (¼) cup garnish of herbs that are classified as Other vegetables, such as chives and garlic, credit as ⅛ cup of Other vegetables. Herbs that are used in amounts smaller than ⅛ cup per serving portion as a garnish or seasoning do not credit toward the vegetable component.

### Hominy, Vegetable Form

When served as a vegetable component, the food item is credited as a starchy vegetable subgroup by volume and must be included in the weekly dietary specifications.

- ¼ cup canned, drained hominy, or cooked, whole hominy from dried hominy credits by volume as ¼ cup for starchy vegetable subgroup

### Leafy Salad Greens

Raw and cooked greens credit differently toward the meal pattern requirements. Raw, leafy salad greens credit at half the volume served.

For Example: A ½ cup serving of romaine lettuce contributes ¼ cup toward the Dark Green vegetable subgroup.

Cooked leafy greens, such as sautéed spinach, are credited by volume served. A ½ cup of cooked spinach credits ½ cup toward the Dark Green vegetable subgroup.

Iceberg lettuce is not considered a Dark Green vegetable, but a salad that consists of a variety of dark leafy greens (such as spinach or romaine lettuce) does count 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 amount served is at least ⅛ cup.

If the quantities are not known, a mixed salad may count toward the Additional Vegetable requirement.

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<sup>17</sup> Available at [www.fns.usda.gov/tn/food-buying-guide-school-meal-programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).

<sup>18</sup> Available at [www.fns.usda.gov/tn/food-buying-guide-school-meal-programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).

<sup>19</sup> For additional information, see *Administrator's Reference Manual (ARM)*, Section 23, *Food Product Labeling* located at [www.SquareMeals.org](http://www.SquareMeals.org).

### Pre-Packaged Salads

Many CEs offer pre-packaged salads as an option for a reimbursable meal. Pre-packaged salads may or may not contain all of the food components. Depending on the CE, students selecting the pre-packaged salad may or may not have the option to select another vegetable component on the line, in addition to the pre-packaged salad, in order to meet the food component requirement.

If the CE has pre-packaged salads that are complete reimbursable meals and does not allow the student to select another vegetable on the line, when selecting a pre-packaged salad, then the week's servings of pre-packaged salad must contain all the vegetable subgroups throughout the week as well as the appropriate servings of fruit, meat/meat alternates, and grains.

### Roasted Legumes

Roasted legumes such as chickpeas and edamame (immature soybeans) may be used for school meals. They are often served the same way nuts and seeds are used as a meat/meat alternate or a legume vegetable.

[NOTE: Peanuts may be used only as a meat/meat alternate component.]

### Creditable Fruit or Vegetable Juice

Juice is defined as

One hundred percent full-strength fruit or vegetable juice is an undiluted product obtained by extraction from sound<sup>20</sup> fruit. It may be fresh, canned, frozen, or reconstituted from concentrate and may be served in either liquid or frozen state. Diluted juice is no longer allowed.

Fruit and vegetable juice are creditable per meal over the course of the week. No more than one half (50%) of the weekly offering for the fruit or vegetable component may be served as juice each week. This maximum includes 100% juice offered as an extra item beyond the point of service, even if extra items offered beyond the point of service are *free*.

Liquid or frozen 100% juice is credited as the volume served.

For Example: One-half cup of apple juice will credit as ½ cup of juice.

### Calculating the Weekly Juice Limit When Multiple Fruit/Vegetable Juices Are Offered

In most cases, the menu planner can total the amount of juice offered each day over a week and determine if the menu limits the amount of juice offered to ½ of the weekly fruit offered. However, if there are multiple lunch options during the week that offer different amounts of juice, the CE should total the amount of juice available at all meals over the course of the week and then divide the total by total fruit (vegetable) offerings for the week.

Calculation of Weekly Juice Amount Chart		
<b>Total Fruit/Vegetable Juice Offerings* for the Week in Cups</b>		<b>Total Fruit/Vegetable Offerings* for the Week in Cups (Juice + Non-Juice)</b>
7 cups (Fruit/Vegetable Juice)	÷	15 cups (7 Fruit/Vegetable Juice + 8 Non-Juice Fruit/Vegetables)
		=
		.46 x 100 = 46 %

\* Based on fruit/vegetable juices that are creditable toward a reimbursable meal.

<sup>20</sup> In this definition, *sound fruit* means a product made from 100% fruit.



## Creditable Juice

For juice to be creditable toward the fruit component, a minimum of  $\frac{1}{8}$  cup of juice must be taken. However, juice and fruit juice concentrate cannot be credited when used as an ingredient in another food or beverage product.

For Example: One-quarter cup of gelatin made with 1 tablespoon of juice concentrate and water does not contribute as  $\frac{1}{4}$  cup of juice since the fruit juice is no longer in the form of liquid or frozen juice.

There are four ways juice can credit toward the fruit requirement:

### Not from Concentrate

- 100 percent liquid juice not from concentrate
- 100 percent frozen juice not from concentrate

### From Concentrate

- 100 percent juice reconstituted from concentrate
- 100 percent frozen juice reconstituted from concentrate

When a juice concentrate is used in its reconstituted form, it is considered a full-strength juice, as appropriate, and is credited accordingly.

## Juice Concentrate

A juice concentrate may be used toward meeting the fruit component of the lunch. When a juice concentrate or a juice drink concentrate is used in its reconstituted form, it is considered a full-strength juice or a juice drink, as appropriate, and is credited accordingly.

## Creditable Juice Blends

If the first ingredient in the 100 percent juice blend or fruit and vegetable blend is fruit or vegetable juice, then, the 100 percent juice blend may contribute to the fruit or vegetable requirement.

### 100 Percent Vegetable

If the first ingredient is a vegetable juice, then 100% juice blend can contribute to the required vegetable component as follows:

- Vegetable juice blends containing vegetables from the same subgroup may contribute toward that vegetable subgroup component.
- Vegetable juice blends containing vegetables from more than one subgroup may contribute to the Additional Vegetable subgroup category.

For Example: A full-strength carrot/tomato vegetable juice blend may credit toward the Red/Orange vegetable subgroup component.

A full-strength vegetable juice blend containing carrots, spinach, tomato, and watercress may only credit toward the additional vegetable subgroup component.

## Creditable Blended Dish Items with Pureed Fruit or Vegetables

Fruit and vegetable puree crediting is based on the actual volume served. For many fruits and vegetables, the pureed form has a smaller volume than the whole fruit or vegetable pieces. There are two sources that provide information to assist CEs in determining the volume amount served for pureed items:

- *Food Buying Guide for Child Nutrition Programs*,<sup>21</sup> including the introduction that contains information about how to obtain in-house yield data.
- Manufacturer's product formulation statement

Creditable amounts of pureed fruit or vegetable food components in a blended dish item may contribute toward the meal pattern requirements as long as a creditable amount (1/8 cup) of a recognizable food component is in the dish. If the dish does not contain at least 1/8 cup of a recognizable food component, then, the blended food item does not contribute to the meal pattern requirements.

For Example: When a macaroni and cheese dish contains 1/8 cup of recognizable diced squash and 1/8 cup of unrecognizable pureed carrots, both the squash and carrots may be credited toward the vegetable component since there is at least 1/8 cup of a recognizable vegetable component in the dish.

### Non-Creditable Juice

The following uses of juice and juice concentrate cannot credit toward the fruit or vegetable components:

- An ingredient in another food or beverage product
- Small amounts (less than 1/8 cup) of fruits or vegetables used for flavoring or as an optional ingredient for a garnish
- An ingredient added to a gelatin item
- A juice product with a label that says 100% juiced

### Combination Entrees That Include Fruit and Vegetables

Menu items such as large combination fruit and vegetable salads that contain at least 3/4 cup or more of fruit and vegetables in combination with a meat/meat alternate intended to be served as an entrée may credit as two or more servings of different components as long as the minimum serving amount for the component is contained in the combination entrée.

For Example: Chef's salad or a fruit plate with cottage cheese

### Mixed Fruit and Vegetable Dishes

Menu items containing a mixture of fruit or vegetables are considered to be one serving of fruit or vegetables.

For Example: Fruit cocktail or mixed vegetables

However, 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 1/8 cup of each of different vegetable subgroups (e.g., carrots and corn) may credit each one toward the appropriate subgroup.

To credit mixed vegetable servings by subgroup, the CE must have a standardized recipe or obtain manufacturer-produced documentation that verifies the portion size for each vegetable to be credited by subgroup.<sup>22</sup> If the quantities of each vegetable are not known, the vegetable mixture may count as an Additional Vegetable or *Other*—in these cases, the CE should consult

<sup>21</sup> Available at [www.fns.usda.gov/tn/food-buying-guide-school-meal-programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).

<sup>22</sup> See *Administrator's Reference Manual (ARM)*, Section 23, *Food Product Labeling* for additional information on this topic.

the *Food Buying Guide for Child Nutrition Program*<sup>23</sup> to determine the appropriate way to classify a vegetable by subgroup.

#### **Salsas or Picante Sauce**

Served in amounts  $\frac{1}{8}$  cup or greater, ingredients in salsas or picante sauces may be credited as a fruit or vegetable component as long as the product contains all fruit or vegetable ingredients plus minor amounts of spices or flavorings. For products that contain non-fruit or non-vegetable components, like gums, starches, or stabilizers, only that portion of the product that is a fruit or vegetable ingredient may be counted towards the  $\frac{1}{8}$  cup volume requirement. A manufacturer product formulation statement should be used to determine the contribution of the fruit or vegetables toward the meal pattern requirement.

#### **Non-Creditable Fruit or Vegetable Food Items**

The following foods may not be credited as a fruit or a vegetable for a reimbursable meal.

1. Rice, pasta (macaroni and cheese), and potato chips may not be counted as a vegetable to meet the fruit or vegetable components.
2. Reimbursable meals must not credit snack-type fruit products. Snack type fruit products that are not creditable include the following:
  - One hundred percent (100%) fruit strips
  - Fruit drops
  - Other snack-type fruit or vegetable products

#### **Common Problems: Fruits and Vegetables**

The following problems are common in serving fruit and vegetables.

1. Food items that do not count toward contributing to the fruit or vegetable component are mistakenly used and counted. This includes pasta and rice, which actually contribute to the grains component, not the vegetable component.

Solution: When in doubt about what contribution a particular food item makes to the lunch meal pattern, always consult the *Food Buying Guide for Child Nutrition Programs*.<sup>24</sup>

2. Juice drinks are mistakenly credited as full-strength fruit juice in contributing to the fruit and/or vegetable component.

Solution: Read the labels of all juice products used in the CE and determine the appropriate portion size and contribution to the lunch meal pattern accordingly.

3. Breaded or extruded fruit or vegetable items are served and credited before a determination of the contribution of the product to the lunch meal pattern has been made including breaded okra, onion rings, and squash. Extruded items include a variety of vegetables or fruits combined with other ingredients and are often breaded.

Solution: Take the following actions:

- Determine the contribution of breaded products by removing the breading of the cooked product and measuring the volume of vegetable; document findings.
- Determine the contribution of extruded products from the CN Label or by obtaining a manufacturer product formulation statement before serving.

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<sup>23</sup> Available at [www.fns.usda.gov/tn/food-buying-guide-school-meal-programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).

<sup>24</sup> Available at [www.fns.usda.gov/tn/food-buying-guide-school-meal-programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).

## Grains Component of the Reimbursable Lunch

Grains are a daily requirement in the NSLP. At least 80% of weekly grain offerings in NSLP must be whole-grain rich.

- To qualify as whole-grain rich, products must contain at least 50 percent whole grains and the remaining grain, if any, must be enriched.
- To qualify as an enriched grain, products must have been fortified with additional nutrients to replace the vitamins lost during the refining process or may be a fortified cereal.

CEs are encouraged to use a variety of products—hot and cold.

### Minimum Grains Requirement

Under the meal pattern requirements, the CE must offer the minimum daily requirement for grains—1.0 oz eq each day—for a reimbursable lunch for Grades K-8 and 2.0 oz eq for Grades 9-12. However, to meet the weekly lunch requirement for all age/grade groups, the CE will need to offer more than the minimum daily on some days of the week.

The menu planner has the discretion to decide the amount of grains to offer each day as long as the minimum grain serving size requirement is met each day.

Grains (oz eq)*	Amount of Grains Per Week (Minimum Per Day)		
	Age/Grades K-5	Age/Grades 6-8	Age/Grades 9-12
	8.0-9.0 (1)	8.0-10.0 (1)	10.0-12.0 (2)

### Recommended Maximum Grain Offerings

Currently, there is no maximum amount of grains to be served daily or weekly as long as the dietary specifications for calories, sodium, and saturated and trans fats are met for the week. The maximum is a recommended range to aid menu planners in staying within the dietary specifications for each age/grade group.

## Whole-Grain Rich Foods

Quantities of grains in the meal patterns for the NSLP are based on oz eq. Whole-grain rich foods must meet (1) the serving size requirements for grains and (2) meet at least one of the following:

- Whole grains per serving must be  $\geq 8$  grams.
- The product must include the United States Food and Drug Administration's (FDA's) whole-grain health claim on its packaging.
- The product ingredient documentation lists *whole grain* first.
- If water is the first ingredient, a whole grain must be the second ingredient.

Whole grains consist of the entire cereal grain seed or kernel. The kernel has three parts:

1. Bran
2. Germ
3. Endosperm

If the finished product retains the same relative proportions of bran, germ, and endosperm as the original grain, it is considered a whole grain.

## Criteria for Whole-Grain Rich Foods for Lunch

Foods that qualify as whole-grain rich products for the NSLP are foods that contain 100 percent whole grain or contain a blend of whole-grain meal and/or flour and enriched meal and/or flour, of which at least 50 percent is whole grain and the remaining grain, if any, must be enriched.

### Fifty Percent Guideline

The 50 percent guideline for whole-grain rich requires that if the food item is a grain-based product (bread, cereal, etc.), it must contain 50 percent or more whole grains by weight or have a whole grain listed as the first ingredient on the ingredient label.

If water is the first ingredient on the label, a whole grain must be the second ingredient. If the food item is a mixed dish product (e.g., lasagna, stir fry, etc.), a whole grain must be the primary grain ingredient by weight.

### Adding Whole Grains to Menus

Menu planners should be creative when adding whole-grain foods to menus. The following items are examples of whole-grain rich products that can be incorporated into menus:

- Whole-grain rich ready-to-eat or cooked breakfast cereals
- Whole-grain rich granola or granola bars
- Whole-grain rich pancakes or waffles
- Whole-grain rich bagels, breads, rolls, buns, or muffins
- Whole-grain rich tortillas, or taco shells
- Whole-grain rich pita pockets
- Whole-grain rich cornbread
- Whole-grain rich crackers

### Determining Whole-Grain Rich Products

CEs can use the following elements as a simple checklist to determine if a grain product

meets the whole-grain rich criteria:

<p><b>Element 1</b> The food item must meet the portion size requirements for the grain component as defined in FNS guidance.</p> <p>See the <i>Lunch Meal Pattern Chart</i> for detailed specifications on the requirements by age/grade group.</p>	<p><b>Element 2</b> The food must meet at least one of the following criteria:</p> <ol style="list-style-type: none"> <li>The whole grains per serving must be <math>\geq 8</math> grams.<sup>25</sup></li> <li>The products include the following Food and Drug Administration (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. <b>or</b> Diets rich in whole-grain foods and other plant foods, and low in saturated fats and cholesterol, may help reduce the risk of heart disease.</li> <li>The product ingredient declaration lists whole grains first, specifically as follows:<sup>26</sup> <ol style="list-style-type: none"> <li>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 with the exception of water as the first ingredient for fully cooked grain and pasta items).</li> <li>Mixed dishes (e.g., pizza, corn dogs): Whole grains must be the primary grain ingredient by weight (whole grain is the first grain ingredient in the list).</li> </ol> </li> </ol> <p>Flour blends are listed in the ingredient list and grouped together with parentheses. For Example: Flour blend (whole wheat flour, enriched flour), sugar, cinnamon, etc.</p>
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The menu planner will need to know whether the whole grain content is at least 8.0 grams per oz eq or that the weight of the whole grain is greater than the first ingredient listed after the flour blend, such as the sugar in Element 2.

[NOTE: While the Whole Grain Stamp that is applied to some products provides useful information, it does not indicate that the product meets the whole-grain rich requirement for the grains component.]

<sup>25</sup> This may be determined from information provided on the product packaging or by the manufacturer, if available. Also, manufacturers may apply for a CN Label for qualifying products to indicate the numbers of grains serving that are whole-grain rich. For more information on CN Labeling, see *Administrator's Reference Manual (ARM)*, Section 23, *Food Product Labeling* or the CN Labeling Program website at [www.fns.usda.gov/cnlabeling/child-nutrition-cn-labeling-program](http://www.fns.usda.gov/cnlabeling/child-nutrition-cn-labeling-program) for details regarding qualifying products.

<sup>26</sup> The product ingredient declaration is a practical way for CEs 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. Detailed instructions for this method appear in the *Whole Grain Resource for the National School Lunch and School Breakfast Program*, which is available online at [www.fns.usda.gov/tn/whole-grain-resource](http://www.fns.usda.gov/tn/whole-grain-resource).

## Crediting Grains

The following whole grains are allowed:

<b>Barley</b> <ul style="list-style-type: none"><li>– Whole barley</li><li>– Whole-grain barley</li><li>– Whole-barley flakes</li><li>– Whole-barley flour</li><li>– Whole-grain barley flour</li></ul>	<b>Rice</b> <ul style="list-style-type: none"><li>– Brown rice</li><li>– Brown rice flour</li></ul>
<b>Corn</b> <ul style="list-style-type: none"><li>– Whole corn</li><li>– Whole-corn masa</li><li>– Whole cornmeal</li><li>– Whole-corn flour</li><li>– Whole-grain corn flour</li><li>– Whole-grain corn harina</li><li>– Whole-grain corn masa</li><li>– Whole-grain cornmeal</li></ul>	<b>Rye</b> <ul style="list-style-type: none"><li>– Whole rye</li><li>– Rye berries</li><li>– Whole-rye flour</li><li>– Whole-rye flakes</li></ul>
<b>Oats</b> <ul style="list-style-type: none"><li>– Whole oats</li><li>– Oat groats</li><li>– Oatmeal or rolled oats</li><li>– Whole-oat flour</li></ul>	<b>Wheat</b> <ul style="list-style-type: none"><li>– Wheat berries</li><li>– Whole-grain wheat</li><li>– Cracked wheat</li><li>– Whole-wheat flour</li><li>– Graham flour</li><li>– Whole durum flour</li><li>– Sprouted wheat</li><li>– Bulgur</li><li>– White whole wheat flour</li></ul>
	<b>Wild Rice</b> <ul style="list-style-type: none"><li>– Wild rice</li><li>– Wild rice flour</li></ul>

### Cereal Grains

Grain products, such as enriched corn grits and enriched rice, that do not include whole grains are not creditable as a single ingredient.

Grain products that are at least 50% whole grain blended with not more than 50% enriched or fortified grain will continue to be creditable.

For Example: A quarter (1/4) cup cooked brown rice blended with 1/4 cup cooked enriched rice is 1.0 oz eq grain that meets the whole grain-rich criteria for Grades K-8.

If a 100% whole grain cereal is offered, it does not have to be fortified.

### Corn Masa, Corn Flour, Corn Harina, and Cornmeal Products—Whole Grain

When served as a grain component, corn masa, corn flour, corn harina, and cornmeal products labeled as whole grains are credited by weight for these products as described in *Exhibit A: Grain Requirement for Child Nutrition Programs*.

### Corn Flour or Corn Meal—Nixtamalized or Treated with Lime

Corn flour or corn meal that has been nixtamalized or treated with lime may be credited toward the grain component by weight as described in *Exhibit A: Grain Requirement for Child Nutrition Programs* or by grams of creditable grain per portion. The following statement on the packaging of nixtamalized corn products or corn treated with lime indicates that the product is a least 50% whole grain:

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



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

In any corn-flour or corn-meal product that has been nixtamalized or treated with lime that is labeled as enriched or includes nutrients sub-listed after the corn ingredient in the ingredient statement, the corn ingredient can only contribute as an enriched grain. If used, these products must be used in a grain product where at least 50% of the grain product is whole-grain rich.

For Example: The ingredient statement says yellow corn flour (folic acid, riboflavin, niacin, and thiamine). The nutrients sub-listed after yellow corn flour indicate that this grain product is enriched, not whole grain.

### Formulated Grain-Fruit Products

A formulated grain-fruit product is considered to be a grain-based dessert for a lunch meal. CEs should consult the *Food Buying Guide for Child Nutrition Programs*<sup>27</sup> to determine which products are considered dessert items and, therefore, must be included in the weekly dessert limit of no more than a total of 2.0 oz eq or less of grain-based desserts each week.<sup>28</sup>

While the fruit in a formulated grain-fruit product does not count toward the fruit component, the grain in the product may be counted toward the grains requirement if the product contains a creditable amount of grains (0.25 oz eq). The requirements for dietary specifications apply.

### Grains and Combination Food Items

Every reimbursable meal offered must meet the minimum daily requirement for all components, including combination food items. If a combination food is offered and the menu planner intends for the combination item to count toward the grain component, the CE must ensure that the grain food item contains enough grains to meet the minimum daily requirement.

For Example: A sandwich roll contains 1.2 oz eq of grains. Since the minimum daily offering of the grains component is 1.0 oz eq, the 1.2 oz eq in the sandwich roll meets the minimum requirement and counts toward meeting the daily grain component minimum requirement for Grades K-8.

A chef salad with 2 crackers contains .2 oz eq of grains. Unless an additional .8 oz eq of grains is offered, the day's menu does not offer enough grains to meet the 2.0 oz eq minimum daily requirement for the grains component for Grades 9-12.

### Hominy, Corn Masa, Masa Harina, Corn Flour, Nixtamalized Corn Flour or Nixtamalized Corn Meal—Non-Whole Grain or Non-Enriched Grain

Any non-whole corn ingredient that is labeled as enriched or that includes nutrients sub-listed after the corn ingredient in the ingredient statement, such as: *yellow corn flour (folic acid, riboflavin, niacin, and thiamine)*, can contribute only to the enriched grain requirements. Corn that is not “whole” or “enriched” or is not treated with lime (nixtamalized) does not credit as a grain.

<sup>27</sup> Available at [www.fns.usda.gov/tn/food-buying-guide-school-meal-programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).

<sup>28</sup> See the *Fruit Dessert* subsection in this section for more information on crediting fruits in desserts. For additional information on grain-based desserts, see the *Food Buying Guide for Child Nutrition Programs, Exhibit A: School Lunch and Breakfast Grain Chart*, available at [www.fns.usda.gov/tn/food-buying-guide-school-meal-programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).



### **Hominy, Corn Masa, or Masa Harina—Enriched**

Hominy, corn masa, or masa harina products labeled as enriched grains are only creditable toward the grain component as enriched grains. If used, these products must be used in a grain product where at least 50% of the grain product is whole-grain rich.

### **Hominy, Dried or Milled—Whole Grain**

When hominy is offered in a dried, milled form, such as grits, the food item credits by weight toward the grains component as whole-grain rich food.

- ½ cup of cooked or 1 ounce (28 grams) of dry hominy grits credits by weight as 1-ounce equivalent grains (oz eq)

#### **Grits**

Products labeled as grits which do not indicate that the product is made of whole grain hominy or corn are not creditable toward the grains component.

### **Less than Two Percent of Product, Non-Creditable Grain Ingredients**

Non-creditable grain ingredients in products, at very low levels, used as processing aids are allowable at levels of less than two percent but do not credit toward a reimbursable meal.

### **Non-Credited Extra Grain Food Items**

Any whole-grain, enriched grain, or fortified cereal served as an extra food item for a reimbursable meal in amounts greater than 0.25 oz eq must be counted toward the total amount of grains served based on the grain type.

For Example: If an extra food item is served that is 1.0 oz eq of enriched grain, the 1.0 oz eq must be counted in the weekly total of enriched grains offered.

### **Non-Creditable Grains Products**

Snack-type foods, such as non-whole-grain rich/non-enriched chips or potato chips, do not qualify as grains and may not be credited toward meeting the grains requirement in meals served in the NSLP. The following grains products are also not creditable:

- Products made from processed grains that are not whole-grain rich.

### **Popcorn**

Popcorn (popped popcorn) is creditable as a food component as a whole-grain rich product by weight or may be served as competitive food as long as the CE has adequate documentation to demonstrate compliance with applicable requirements. USDA has updated the *FBG* to include popcorn.

[NOTE: Because of the choking hazard, popcorn is not recommended for young children.]

When served as a food component, the food item must be included in the weekly dietary specifications.

- 0.25 ounces (¾ cup or 7 grams) of popcorn credits as 0.25 oz eq of whole grains.
- 0.5 ounces (1½ cups or 14 grams) of popcorn credits as 0.5 oz eq of whole grains.
- 1.0 ounces (3 cups or 28 grams) of popcorn credits as 1.0 oz eq of whole grains.

### Ready to Eat Breakfast Cereal

A ready-to-eat (RTE) breakfast cereal must list a *whole grain* as the primary ingredient. If the grain product includes enriched ingredients, or the product itself is enriched, the ingredients or the grain product must meet the FDA's standard of identity for enrichment.<sup>29</sup> One hundred percent whole grain cereals do not need to be fortified. Bran and germ are not creditable as an enriched ingredient in NSLP. Non-creditable grain ingredients in products at very low levels used as processing aids are allowable at levels less than two percent.

### Serving Non-Whole-Grain Rich, Non-Enriched Grains, or Non-Fortified Cereal

If a CE offers grains that do not meet the whole-grain rich, enriched, or fortified specifications, the CE may count the grains as an Extra food item. Extra food items must be counted toward the weekly dietary specifications but are not creditable toward the grains component for a reimbursable meal.

### Snack Type Grains Products

Snack-type foods, such as non-enriched chips or potato chips, do not qualify as grains and may not be credited toward meeting the grains requirement in meals served in the SBP. The following grains products are also not creditable:

- Products made from processed grains that are not whole-grain rich or enriched

### Stone-Ground Corn or Degermed Corn

Products labeled as stone-ground corn or degermed corn are not creditable toward the grains component.

### Woman, Infant, and Children (WIC)-Approved Whole Grain List

Items designated as WIC-approved credit toward whole-grain rich even if the product has non-creditable grain ingredients anywhere in the ingredient statement.

## Determining Daily Grain Contribution

To determine the daily and weekly required minimum and the recommended maximum grain offerings for a planned menu, the menu planner must identify the menu item(s) with the smallest grain contribution for the day and the menu item(s) with the largest grain contribution for the day. Then, do the following:

1. Minimum Offering—Sum the smallest daily contributions for the week  
(Multiply the smallest daily amount times the number of days in that week)
2. Maximum Recommended Offering—Sum the largest daily contributions for the week  
(Multiply the largest weekly amount times the number of days in that week)

The daily and weekly minimums must be within the age/grade group guidelines for which the specific menu was planned. The daily and weekly maximums will help the CE to serve healthy meals and meet the weekly dietary specifications.

### Food Buying Guide for Child Nutrition Programs

CEs should refer to the *Food Buying Guide for Child Nutrition Programs, Appendix E, Exhibit A*<sup>30</sup> for an updated list of whole-grain rich equivalent requirements for school nutrition programs. When any cereal grain is used as an ingredient in a grain product, use the serving size given for the appropriate grain

<sup>29</sup> See 21 CFR 137 for additional information on this topic.

<sup>30</sup> Available at [www.fns.usda.gov/tn/food-buying-guide-school-meal-programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).

group.

For Example: A serving of oatmeal cereal should weigh 29 grams (*Food Buying Guide for Child Nutrition Programs, Appendix E, Exhibit A: Grain Requirements for Child Nutrition Programs*).

### Criteria for Determining Ounce Equivalent Serving Sizes

All grains offered in amounts of 0.25 oz eq—the minimum creditable amount—or greater must be included in the calculation of daily and weekly grain offerings, as well as in the dietary specifications (calories, sodium, and saturated and trans fat).

The criteria to credit various grain products on the oz eq standards are as follows:

- Baked goods, such as bread, biscuits, bagels, etc., require 16 grams of creditable grain ingredients in order to provide 1.0 oz eq credit.
- For cereal grains, such as oatmeal, pasta, and brown rice, a 1.0-oz eq is 28 grams (approximately 1.0 oz by weight) of dry product. Since these grains are served cooked and water is added in preparation, the cooked volume equivalent is ½ cup cooked cereal, pasta or rice.
- For ready-to-eat (RTE) breakfast cereal, 28 grams or 1.0 oz of product is considered an oz eq. The oz eq volumes are 1-cup flakes or rounds, 1¼ cups puffed cereal, and ¼ cup granola.

### Weekly Grain Minimum Requirement and Maximum Recommendation

All grains offered in the amount of 0.25 oz eq or more must be counted toward meeting these minimum requirements and maximum recommendations using the oz eq. The meal pattern provides a minimum required and maximum recommended number of oz eq for total weekly grains servings by age/grade group.

### Breaded Products

All grains offered that are part of battered and/or breaded products in the amount of 0.25 or more must be counted towards the weekly grains requirement. All grains incorporated into battered and breaded products that are less than 0.25 oz eq are considered extra food and do not count toward meeting the grains requirement even if whole-grain rich. All breaded products must be included in the weekly dietary specifications.

### Fully Cooked Grains, Water as First Ingredient

Fully cooked grain and pasta items with nutrition labels that have *water* as the first ingredient, followed by a whole grain are considered whole-grain rich.

### Documentation for Crediting Grains

CEs have the flexibility to use a wide range of products in planning meals which meet the lunch meal pattern and nutrition specifications. CEs are strongly encouraged to offer food items that are low in added sugars, sodium, and saturated fat in order to meet the meal pattern requirements and nutrition specifications and to provide foods that are consistent with the *Dietary Guidelines for Americans*.

CEs should use the updated *Food Buying Guide for Child Nutrition Programs (FBG)*<sup>31</sup> to assist them in determining the grain contribution in a recipe. If this information is not listed, the *FBG* also provides a formula for making this calculation. CEs may also use a manufacturer product formulation statement to help with this determination.

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<sup>31</sup> Available at [www.fns.usda.gov/tn/food-buying-guide-school-meal-programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).

A measurement of 0.25 oz eq is the smallest amount allowable to be credited toward the quantity of grains. The minimum daily requirement for grains can be met by offering multiple food items.

For Example: A combination of 0.5 oz eq of one grain item and 0.5 oz eq of another grain item

Grains products that have ingredients labels with the words *whole wheat* or *entire wheat* before the product type (i.e., whole-wheat bread) are 100 percent whole grain products that are creditable. The oz eq for grains may be determined by using either the weights or volumes listed in the *Food Buying Guide for Child Nutrition Programs*.<sup>32</sup> Or, the CE may request documentation from a manufacturer certifying the grams of creditable grains per portion for determining the oz eq from a given product.

The crediting of a food item as oz eq grains is determined by

Total Grams of Creditable Grains in the Food Product	÷	16.0	=	Number of Ounce Equivalents in Food Product
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If calculating the total grams of creditable grains for a product or recipe and the total grams of creditable grains is not reported by serving portion size, divide the total number of serving portions in the product or recipe.

#### Reminders Regarding Grains

1. Do not include grain food items offered at breakfast as contributing to the required number of servings of grains per week required by the lunch meal patterns.
2. The grain requirement is determined on a weekly basis. At least 80 percent of the grains offered for the week must be whole-grain rich. Any grain offered that is not whole-grain rich is not creditable. If offered, the non-whole-grain rich non-enriched grain product must be counted as an Extra item and must be included in the weekly dietary specifications.
3. When a choice of two different menu items is offered, CEs should credit for the smaller sized grain offering for the day when determining the minimum amount of grain offered each day and for the weekly total

For Example: In the following example, the menu planner should count the day's minimum grain offering as 1 grain and the maximum offering as 2 grains.

Salad Bar	Hamburger on Bun
8 square saltine crackers = 1 grain	1 bun = 2 grains

#### Grains Product Labeling

Manufacturers producing qualifying products (meat/meat alternate entrées containing grains) may apply for a Child Nutrition (CN) Label<sup>33</sup> to indicate the number of oz eq grains that meet the whole-grain rich criteria. The term *oz eq grains* on the CN Label indicates that the product meets the whole-grain rich criteria.<sup>34</sup>

For Example: The label may say that the grain “provides X.X servings of whole-grain rich (or WGR) grains for Child Nutrition Programs.”

<sup>32</sup> Available at [www.fns.usda.gov/tn/food-buying-guide-school-meal-programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).

<sup>33</sup> If a manufacturer does not have a CN Label for a product, a CE may request a product formulation statement. See the *Administrator's Reference Manual (ARM)*, Section 23, *Food Product Labeling* for additional information on product formulation statements.

<sup>34</sup> See the *Administrator's Reference Manual (ARM)*, Section 23, *Food Product Labeling* for additional information or the CN Labeling Program website at [www.fns.usda.gov/cns/cnlabeling](http://www.fns.usda.gov/cns/cnlabeling) for details regarding qualifying products.

## Common Problems: Grains

1. Purchased-prepared (or partially prepared) grain items are served and credited as contributing to the lunch meal pattern before it has been determined whether the items are whole-grain rich. Examples of purchased-prepared grain items include refrigerated rolls, taco shells, tortillas and tortilla pieces, dry biscuit and muffin mixes, and prepared pizza crusts.

Solution: Secure an ingredient statement from the individual product wrapper, bulk packing container, or manufacturer demonstrating that a serving contains at least 50 percent whole grain.

2. A smaller-sized portion of the menu item being credited daily as a grain is served in the lower grades (Grades K-5 and 6-8, 1.0 oz eq) thus reducing the serving size to less than one full serving including rice, macaroni and spaghetti, taco shells and crackers.

Solution: When reducing the portion size of a grain menu item to less than a full-sized serving for students in the lower grades, be certain that the item is not the sole source of grain in the daily menu. Less than a full-sized serving of grains may be counted toward the weekly grain requirement, but the minimum daily requirement for age/grade groups K-5 and 6-8 is one full serving of grains.

## Meat/Meat Alternate Component of the Reimbursable Lunch

To be counted in meeting this requirement, the meat/meat alternates must be served in a main dish or in a main dish and one other menu item.

Meat/Meat Alternates (oz eq)	Amount of Meat/Meat Alternates <sup>a</sup> Per Week (Minimum Per Day)		
	Grades K–5	Grades 6–8	Grades 9–12
	8–10 (1)	9–10 (1)	10–12 (2)
<sup>a</sup> Food items included in each food group and amount equivalents.			

## Minimums Meat/Meat Alternate Requirement

The meal pattern allows the offering of the meat/meat alternate as a weekly total with a minimum daily serving size of 1.0 oz eq for grades K–5 and grades 6–8 and 2.0 oz eq for grades 9–12. Menus can have more than one meat/meat alternate at one meal as long as the total equals the minimum daily requirement. The minimum creditable serving is 0.25 oz eq

An advantage to having a minimum daily and weekly requirement is that serving a smaller size of a higher fat meat/meat alternate on one day could reduce the fat level for the menu. In the case of only one daily choice, another meat/meat alternate of a lower fat content could be served in a larger portion during the week to make up the ounce (oz) difference.

[NOTE: To successfully use this option, the food production record and related documentation must clearly identify the daily serving size of the meat/meat alternate.

For Example: For grades K–5, a CE can serve 4.0 oz of peanut butter with ½ cup apples and 4.0 oz of yogurt]

[NOTE: Modifications are allowed but the CE must still comply with the requirements for OVS.]

The daily quantity of meat/meat alternates can be varied on a daily basis as long as the total amount served over the serving week meets the weekly requirement.

For Example: For grades 6–8, 1.0 oz eq meat/meat alternate is the minimum daily requirement. However, serving the minimum 1.0 oz eq of meat/meat alternate every day for a five-day week (1.0 oz eq x 5 = 5.0 oz eq) will not meet the total weekly minimum requirement of 9.0 oz eq. To meet the 9.0 to 10.0 oz eq weekly-required range, a CE will need to offer more than 1.0 oz eq of meat/meat alternate on some days.

Monday	Tuesday	Wednesday	Thursday	Friday	Total
2.0 oz eq	1.0 oz eq	3.0 oz eq	2.0 oz eq	1.0 oz eq	9.0 oz eq

### Crediting Meat/Meat Alternate Items

It is sometimes difficult to determine the contribution various meat products make toward meeting the meat/meat alternate requirement by reading the label. Using the following questions will help in resolving issues related to meat products served at lunches.

1. What percent of fat is in the meat?
2. If cooked dry beans are used, what is the volume measure?  
[NOTE: The serving size of beans is measured by volume, not weight.]
3. If an Alternate Protein Product (APP) is used to contribute toward the meat/meat alternate requirement, is it used in compliance with regulations?
4. Finally, what contribution does the total product make toward meeting the meat/meat alternate requirement?

### Minimum Amounts to Be Credited

Small amounts (less than .25 oz eq) of meat/meat alternate used as garnishes, seasoning, or in breading do not count toward meeting the meat/meat alternate requirement of the meal.

For Example: Grated Parmesan cheese used as a garnish over spaghetti or egg used in breading cannot be counted toward meeting the meat/meat alternative requirements. However, the use of such garnishes is encouraged to make the lunch more appealing.

### Determining the Contribution of a Menu Item to the Meat/Meat Alternate Component

The following questions, examples, and suggested actions can be used to help in determining the contribution of a menu item toward meeting the meat/meat alternate component.

To use these questions, first, identify the product and then begin with Question 1. If the answer is yes, stop and take the suggested action. If the answer is not yes, continue to the next question until the answer is yes and take the action suggested.



<p><b>Question 1</b></p> <p>Is the product made in a kitchen in the CE from scratch? <u>OR</u> Do you know the total weight or measure of the ingredients contributing to the meat/meat alternate component (and the fat content when applicable)?</p> <p>For Example: Kitchen-made chili con carne, tuna noodle casserole, turkey potpie, and beef patties shaped from bulk ground beef.</p>	<p><b>If <u>YES</u>, do this.</b></p> <p>Using the <i>Food Buying Guide for Child Nutrition Programs</i><sup>35</sup> and your CE's recipe for the product, determine if the total amount of meat/meat alternate used will yield the projected number of servings.</p>
<p><b>Question 2</b></p> <p>Is the purchased-prepared meat item 100% meat/meat alternate?</p> <p>For Example: Preformed ground beef patties and unbreaded fish portions</p>	<p><b>If YES, do this.</b></p> <p>Weigh the cooked product.</p>
<p><b>Question 3</b></p> <p>Is it possible to separate the meat/meat alternate from the other ingredients in the <u>purchased-prepared</u> menu item?</p> <p>For Example: Preformed ground beef patties and spaghetti and meat sauce</p>	<p><b>If YES, do this.</b></p> <p>Separate the meat/meat alternate from the other ingredients and weigh the cooked meat/meat alternate.</p> <p>or</p> <p>Purchase a CN labeled product.</p> <p>or</p> <p>Secure a manufacturer product formulation statement before serving the product.</p>
<p><b>Question 4</b></p> <p>Is the purchased-prepared menu item a combination of foods from which the meat/meat alternate <u>cannot be separated</u> from the other ingredients?</p> <p>For Example: Beef in BBQ sauce, corn dog and breaded fish portion</p>	<p><b>If YES, do this.</b></p> <p>Purchase a CN labeled product.</p> <p>or</p> <p>Secure a manufacturer product formulation statement before serving the product.</p>

### Basis for Crediting Meat, Poultry and Seafood Products

Meat, poultry, and seafood products used in the NSLP are credited on the raw basis using the appropriate cooking yields listed in the *Food Buying Guide for Child Nutrition Programs*.<sup>36</sup> The method uses the product's raw weight and appropriate cooking yield to determine the creditable portion. The basic concept underlying product crediting is *nutrient concentration*—the amount of nutrients by weight in a finished cooked product. When a product is cooked, fat and water are lost while the essential nutrients are retained in a slightly more concentrated form. This is done to provide equity in crediting different types of products regardless of the cooking methods used or the addition of binders or extenders. This, in turn, provides for comparable nutritional value (e.g., protein content) of a product when it is cooked by several different methods.

For Example: Ground beef patties weighing 3.0 oz are cooked three different ways: (1) pan fried, (2) oven broiled and (3) grilled. Their cooked weights are 2.20 oz eq, 2.75 oz eq, and 2.63 oz eq, respectively. If these patties were to be credited according to their cooked weights, Patty 2 would receive more credit than Patty 1 or Patty 3 even though all the patties were prepared with exactly the same amount of meat. The variation in

<sup>35</sup> Available at [www.fns.usda.gov/tn/food-buying-guide-school-meal-programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).

<sup>36</sup> Available at [www.fns.usda.gov/tn/food-buying-guide-school-meal-programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).

cooked weights is due to differences in fat and water losses with only a minimal loss of nutrients.

Another illustration of differences in crediting is when 3-oz beef patties are cooked by the same methods described above but contain 28 percent hydrated soy protein flour. The presence of the soy protein flour will decrease the amount of fat and water lost during cooking; therefore, the cooked weights of the beef-soy patties will be greater than the cooked weights of the all-beef patties. However, the nutritional value of the beef-soy patties, as served, is not greater. Their higher weights reflect an increased retention of fat and water only.

This product information can be obtained from the *Food Buying Guide for Child Nutrition Programs*<sup>37</sup> and/or a product formulation statement provided by the manufacturer.

### **Recommended Maximum Meat/Meat Alternate Offering**

Currently, there is no maximum number of meat/meat alternates to be served daily or weekly as long as the dietary specifications for calories, sodium, and saturated and trans fats are met for the week.

CEs must offer meat/meat alternates daily as part of the lunch meal. The quantity of meat/meat alternate must be the edible portion served. CEs may adjust the daily quantities of the meat/meat alternate component provided that (1) a minimum of 1.0 oz eq is offered daily to students in grades K–8 or 2.0 oz eq is offered daily to students in grades 9–12 and (2) the total weekly minimum requirement is met over a five-day period

### **Using Combinations**

Using combinations to meet the meat/meat alternate requirement is allowed under NSLP regulations. When doing so, remember that it is more difficult for the cashier to determine if a complete meal has been selected when using OVS.

For Example: The following combinations meet the 2.0 oz meat/meat alternate minimum daily requirement for students in the age/grade group 9–12.

- One (1.0) oz cooked lean meat + 1.0 oz cheese
- One (1.0) oz cooked lean meat + ¼ cup cooked dry beans
- One (1.0) oz and one-half (1.5) oz cooked poultry + 1 tbsp. peanut butter
- One-quarter (¼) cup cooked dry peas + 1.0 oz cheese
- One (1.0) oz cooked fish + ½ large egg
- One-quarter (¼) cup cottage cheese + ½ large egg
- One and one-half (1.5) oz cooked lean meat + .5oz cheese
- One-half (½) cup soy yogurt + ½ large egg
- Two tablespoons. peanut butter + 1.0 oz cheese
- One-quarter (¼) cup cooked beans + ¼ cup tofu

However, if combinations are used, they should be menued and merchandised together as a

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<sup>37</sup> Available at [www.fns.usda.gov/tn/food-buying-guide-school-meal-programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).



single item.

For Example: A soup and sandwich combo that contains all of the required components for a reimbursable meal may be offered. If a student selects the combo, the student has chosen a reimbursable meal.

However, if a soup and sandwich combo that contains three required components is offered, and the student takes only the soup, the soup is not a reimbursable meal. To select a reimbursable meal, the student must select other items to accompany the soup so that the student selects the required components for a reimbursable meal.

## Meat/Meat Alternate, Special Guidance

### 100% Vegetable (Legume) Flour

Pasta made with 100 percent legume flour is creditable as a meat/meat alternate food component by volume if the pasta is served with another recognizable meat/meat alternate. CEs may use a product formulation statement or the bean flour crediting information in the *FBG Appendix C, Food Items for Further Processing*.

When a legume flour credits as a meat/meat alternate, ½ cup of cooked pasta made of 100 percent legume flour credits as 2 oz eqs of meat/meat alternate.

When legume flour credits as a meat/meat alternate, the same serving cannot be credited as a vegetable component serving.

### Alternate Protein Products

Developments in food technology have created new types of alternate protein products that CEs can now use. An alternate protein product may be used to resemble and substitute for meat, poultry, or seafood.

CEs may use alternate protein products to fulfill all or part of the meat/meat alternate component for the meal pattern including the use of commercially prepared meat or meat alternate product combined with alternate protein products or the use of commercially prepared products that contain only the alternate protein products. Alternate protein products may be used in the dry form (dehydrated), partially hydrated, or fully hydrated form. The alternate protein product may be used alone or in combination with other food ingredients.

For Example: Combined food items include beef patties, beef crumbles, frankfurters, pizza topping, meat-loaf, meat sauce, taco filling, burritos, and tuna salad.

An alternate protein product used alone or in combination with meat or other meat alternatives must have product documentation<sup>38</sup> that demonstrates that it meets the following criteria:

1. Processed so that some portion of the non-protein constituents of the food is removed.
2. Made of safe and suitable edible products produced from plant or animal source(s).
3. Have a protein biological quality that is at least 80 percent that of casein as determined by Protein Digestibility Corrected Amino Acid Score (PDCAAS).

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<sup>38</sup> See the *Administrator's Reference Manual (ARM), Section 23, Food Product Labeling* for additional information on acceptable product documentation.

4. Must contain 18 percent protein by weight when fully hydrated.

For alternate protein products, documentation must include sufficient information to determine if the product meets the criteria listed above, including the percent protein contained in the dry alternate protein product and for the prepared to serve alternate protein product.

For alternate protein product mixes, documentation must include sufficient information to determine the weight of dry alternate protein product in the package when the directions for the hydration and mixing with meat or other meat alternates are used.

#### Cheese Food and Cheese Spread Substitutes

Cheese food substitutes and cheese spread substitutes would receive the same credit as cheese foods and cheese spreads (2.0 oz provide 1.0 oz eq meat alternate). Remember that cheese food and cheese spread are items that have a specific standard of identity. The term *cheese product* is a category name and is nonstandardized; therefore, any item that only has the name *cheese product* would receive no credit toward the meal pattern requirement. Similarly, while substitutes may receive credit in the NSLP, any product labeled as an imitation is not creditable.

#### Cheese Substitutes

USDA allows cheese substitutes to be used in the NSLP. Cheese substitutes can be used with another meat/meat alternate or they can be used alone to meet the total meat/meat alternate requirement. One (1.0) oz of cheese substitute provides 1.0 oz eq meat alternate. When a CE uses a cheese substitute or cheese spread, the CE must have product documentation<sup>39</sup> that demonstrates that the product meets these requirements for the food item to be creditable.

#### Cooked Dry Beans or Peas (Legumes)

Cooked dry beans and peas (legumes) may be used to meet all or part of the meat/meat alternate component. However, cooked dry beans or peas (legumes) may also be used as a vegetable. Dry beans and peas (legumes) may meet the requirement for both components in the same meal. However, to count as both a meat/meat alternate and a vegetable, the items must be two different servings—a single serving cannot be credited for both a meat/meat alternate and a vegetable.

For Example: Beans in chili served as the main dish may be credited as the meat alternate or as a vegetable component.

Beans in the burrito may be credited as the meat alternate and an additional serving of beans as a vegetable side dish may be counted as a vegetable in the same meal.

#### Enriched Macaroni Products with Fortified Protein

Enriched macaroni with fortified protein is a macaroni product to which protein has been added. It is not the same as regular enriched macaroni. Enriched macaroni with fortified protein must be combined with meat, poultry, fish, or cheese. Dry enriched macaroni with fortified protein may be used to meet no more than 50 percent of the meat/meat alternate requirement. Only products that appear on the USDA listing of acceptable enriched macaroni with fortified protein may be used. The label for these products must have a statement similar to the following:

One (1.0) oz dry weight of this product meets one-half of the meat or meat alternate requirement of lunch in the NSLP when served in combination with one or more ounces of cooked meat, poultry, fish, or cheese.

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<sup>39</sup> See the *Administrator's Reference Manual (ARM)*, Section 23, *Food Product Labeling* for additional information on acceptable product documentation.

One (1.0) oz (28.35 grams) dry weight of this product meets ½ of the meat/meat alternate requirement for lunch for the USDA child nutrition programs when served in combination with 1.0 or more oz (28.35 grams) of cooked meat, poultry, fish, or cheese.

### Low-Fat and Reduced-Fat Cheeses

The Food and Drug Administration (FDA) has announced regulations or requirements for foods named by use of a nutrient content claim and a standardized term for these products. The regulations allow manufacturers to reduce the fat content of their products and call them *low fat*, *light*, or *reduced*, as appropriate, as long as the food is still nutritionally equivalent and otherwise complies with the standardized version.

Low-fat and reduced-fat cheeses are allowed to be credited toward meeting meal pattern requirements in the NSLP on an ounce-per-ounce basis, the same as regular fat cheeses. These products can be served by themselves or in combination with regular fat cheeses. For companies to make low-fat or reduced-fat claims, this guidance must be followed:

- Low-fat cheese must contain 3 grams or less total fat per 50 grams of product.
- Reduced-fat cheese must contain at least 25 percent less fat per 50 grams than the regular fat product.

CEs may use the *Food Buying Guide for Nutrition Programs*<sup>40</sup> for a list of cheeses that meet the described criteria.

### Non-Meat Alternate Protein Foods

Non-meat alternate protein foods include enriched macaroni products with fortified protein and alternate protein products.

### Nuts and Seeds

Peanuts, soy nuts, tree nuts, or seeds can only count as one half of the meat/meat alternate requirement. They must be combined in the meal with another meat/meat alternate (lean meat, poultry, fish, cheese, large egg, cooked dry beans or peas (legumes), peanut butter or other nut or seed butters) to fulfill the requirement.

Acorns, chestnuts, and coconuts cannot be counted as a meat alternate in the NSLP.

For Example: One (1) oz of chopped nuts served in a chicken dish with 1.0 oz chicken, or 1.0 oz of peanuts served with a sandwich containing 1.0 oz eq of cheese fulfills the 2.0 oz eq meat/meat alternate requirement.

### Shelf-Stable, Dried and Semi-Dried Meat, Poultry, and Seafood Products

Shelf-stable, dried and semi-dried meat, poultry, and seafood are creditable as a meat/meat alternate component as long as the contracting entity (CE) retains adequate documentation to demonstrate compliance with applicable requirements. When served as a food component, the food item must be a credible portion size and must be included in the weekly dietary specifications.

Because of the varied production standards for this type of food product, USDA will not include these items in the *Food Buying Guide for Child Nutrition*

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<sup>40</sup> Available at [www.fns.usda.gov/tn/food-buying-guide-school-meal-programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).

*Programs (FBG)*. Documentation must be a product formulation statement or a nutrition fact label which provides the following information:

1. Creditable meat ingredient listed on a product formula statement that matches or has a similar description as the ingredient listed on the product label.  
For Example: ground beef, not more than 30 percent fat or beef round roast.
2. Creditable meat ingredient listed on the product formulation statement must have a similar description to a food item in the *FBG*.
3. Creditable amount cannot exceed the finished weight of the product.

### **Surimi Seafood**

Chunked, shredded, and flaked surimi seafood is credible as a meat/meat alternate component by weight as long as the CE retains adequate documentation to demonstrate compliance with applicable requirements. USDA has updated the *FBG* to include surimi seafood products.

[NOTE: Surimi products may include other products which may also be creditable toward one of the other food components. CEs must read product labeling carefully to determine the amount creditable for meat/meat alternates or other components.]

When served as a food component, surimi is credited by weight as a meat/meat alternate and must be included in the weekly dietary specifications.

- 4.4 ounces credits as 1.5 oz eq of meat/meat alternate.
- 3.0 ounces credits as 1.0 oz eq of meat/meat alternate.
- 1.0 ounce credits as 0.25 oz eq of meat/meat alternate.

### **Tempeh**

Tempeh with ingredients limited to soybeans (or other legumes), water, tempeh culture, and, for some varieties, vinegar, seasonings, and herbs may be credited as a food component by weight or maybe served as a competitive food as long as the CE retains adequate documentation to demonstrate compliance with applicable requirements.

NOTE: Tempeh is produced using the *Rhizopus* culture. This may be listed on the ingredients label, for example, as *rhizopus oligosporous* culture, *rhizopus* culture, *rhizopus*, tempeh culture, or starter culture

When served as a food component, tempeh is credited by weight as a meat/meat alternate and must be included in the weekly dietary specifications.

- 1.0 ounces credits as 1.0 oz eq of meat/meat alternate.

A creditable amount of tempeh which also contains other creditable ingredients, such as brown rice, sunflower, seeds, flax seeds, and/or vegetables, may also create as a food component as appropriate to the ingredient. CEs must have documentation that demonstrates the crediting amount for each food component.

## Yogurt

Yogurt may be used to meet all or part of the meat/meat alternate requirement. Four oz or ½ cup of yogurt fulfills the equivalent of 1.0 oz of the meat/meat alternate requirement in the meal pattern. It may be plain or flavored, unsweetened or sweetened. Noncommercial and/or nonstandardized yogurt products, such as frozen yogurt, homemade yogurt, yogurt flavored products, yogurt bars, yogurt covered fruit and/or nuts, or similar products cannot be credited toward the meat/meat alternate contribution.

### Tofu and Soy Yogurt

Tofu is defined as follows:

Tofu means a soybean-derived food, made by a process in which soybeans are soaked, ground, mixed with water, heated, filtered, coagulated, and formed into cakes. Basic ingredients are whole soybeans, one or more food-grade coagulants (typically a salt or an acid), and water.

Tofu and soy yogurt can be offered as a meat alternate in a reimbursable meal. For tofu and other soy products to be creditable, it must be commercially prepared. Noncommercial tofu and soy products are not creditable.

### Creditable Tofu

Tofu does not currently have a standard of identity; however, it is encouraged to use plant-based sources of protein such as tofu. Tofu is commonly used to produce other meat alternate products, such as links and sausages made from tofu. Links and sausages made from tofu can be easily recognized by students as a meat alternate and are creditable if it meets the requirements for tofu. CEs are not required to offer tofu as part of the lunch menu; however, consumption of a balanced variety of protein-rich foods can contribute to improved nutrient intake and health benefits.

When considering processed tofu products from links and sausages made from tofu as a meat alternate, the tofu ingredient must contain the required five grams of protein per 2.2 oz by weight. This means the tofu must contain at least 18 percent protein when fully hydrated or formulated to be credited.

For Example: One-quarter (¼) cup (2.2 oz) tofu with ≥ 5 grams of protein is creditable as 1.0 eq oz meat alternate.

One-half (½) cup (4.0 fl oz) soy yogurt is creditable as 1.0 oz eq meat alternate. This is the same as the crediting of dairy yogurt when CEs use dairy yogurt as a meat alternate.

The additional ingredients beyond the tofu in a meat substitute, such as tofu sausage, should also be included on the nutrition label. Unless the product carries a CN Label,<sup>41</sup> the protein amount listed on the label for the meat alternate does not necessarily indicate the protein of the tofu for compliance with the meal pattern requirements. Therefore, the CE would need to obtain this information on a manufacturer product formulation statement from the tofu manufacturer.

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<sup>41</sup> See *Administrator's Reference Manual (ARM), Section 23, Food Product Labeling* for additional information on this topic.

#### Types of Not Creditable Tofu

The following types of tofu **must not** be counted as a meat/meat alternate for a reimbursable meal.

- Products made with tofu that are **not** easily recognized as a meat substitute would **not** contribute as any component of the reimbursable meal and do not meet the function of the meat/meat alternate component.

For Example: Soft tofu that has been blended into a recipe so that it is not recognizable (i.e., in a soup) or does not represent a meat substitute (i.e., tofu noodles) do not qualify as a meat alternate.

- If the amount of protein in the tofu is **not listed on the nutrition facts label, it is not creditable**. To ensure that the tofu product meets the requirements to be credited in a reimbursable meal, TDA suggests that the CE request that the tofu product be manufactured under the Child Nutrition (CN) Labeling Program.<sup>42</sup>
- Firm tofu that meets USDA requirements for tofu can be diced into miso soup and be credited toward the meat alternate component. The miso ingredient, dissolved into the broth of the miso soup, is a fermented soy product that is not creditable as it is not tofu.
- Soft tofu, pureed into a soup, is not creditable because it is not recognizable and does not represent a meat substitute. Therefore, the blended tofu is not creditable.
- Noodles made from tofu do not represent a meat alternate and are not composed of grains and, therefore, are not creditable for either meat alternate or grains.

#### Information Box 1

##### Additional Information on Meat Products

##### Meat and Poultry Inspection in Texas

The Texas Department of State Health Services (DSHS), Division for Regulatory Services, Meat Safety Assurance Unit, is responsible for administering the meat and poultry inspection program in Texas. All State of Texas meat and poultry plant labels are reviewed by the Labels and Standards Program to assure they are truthful and accurate at the time of approval. For additional information, contact DSHS.

Meat Safety Assurance Unit, MC 1872  
Texas Department of State Health Services  
P.O. Box 149347  
Austin, Texas 78714-9347

Telephone: (512) 834-6760  
TDD: 1-800-735-2989

Fax: (512) 834-6763

##### Standards for Meat and Poultry Products

USDA standards for meat and poultry products set legal requirements for content, preparation, and labeling before being manufactured and sold in commerce. Standards of identity set specific (and optional) ingredients a food must contain—such as the kind and amount of meat, percent of fat or moisture and additives, if any—when a product is to be labeled or identified by a common product name. See USDA FNS website

([www.fns.usda.gov/fdd/specifications-us-grade-standards](http://www.fns.usda.gov/fdd/specifications-us-grade-standards)) for more information on the standards for meat and poultry products.

<sup>42</sup> See *Administrator's Reference Manual (ARM), Section 23, Food Product Labeling* for additional information on this topic.



#### Purchasing and Crediting Tofu

One pound tofu with 37 grams of protein equals a 7.28 oz eq serving. Quarter cup (1/4 cup) servings per pound and provides 7.25 oz eq meat alternate.

Refer to the *Food Buying Guide for Child Nutrition Programs, Specifications for Tofu and Soy Yogurt Chart*<sup>43</sup> for more information on purchasing and crediting tofu.

#### Steps Before Purchasing Any Meat, Poultry, Fish, or Tofu Product

CEs should take the following steps before purchasing any meat, poultry, fish, or tofu product:

- Request a sample of the product and the product label and be certain that the product purchased with the same label is received.
- Check to see if the label has percentage ingredient listing and request percent labeling on products purchased to know the product's ingredients that contribute to the meal pattern if necessary.
- Check to see if the fat content, both total fat and saturated fat, of the item is listed on the label.
- Check to see if the amount of trans fat is listed on the label.
- Check to see if the sodium content is listed on the label.
- Weigh the actual product to see if the net weight is correct.
- Check to see if the USDA statement verifying the use of the alternate protein product in the NSLP is printed on the label (if the product contains alternate protein product). This statement is not required to appear on meat, poultry, or fish labels but often does.

#### Common Problems: Meat/Meat Alternate

1. Meat products with an unknown meat and fat content are purchased and served as a reimbursable component of the lunch.

Solution:

- Secure a CN label or manufacturer product formulation statement before purchasing the menu item.
- Monitor deliveries to ensure that the products used are those ordered and documented.
- Use the USDA Standards for Meat and Poultry Products to determine the content of certain products.<sup>44</sup>

2. The recipe does not include a sufficient amount of meat/meat alternate to yield the predicted number of servings.

Solution: Check all CE recipes against the *Food Buying Guide for Child Nutrition Programs*.<sup>45</sup>

3. The menu item is served with the wrong-sized utensils, thus changing the contribution of

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<sup>43</sup> Available at [www.fns.usda.gov/tn/food-buying-guide-school-meal-programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).

<sup>44</sup> See the USDA Agricultural and Marketing Services website ([www.ams.usda.gov](http://www.ams.usda.gov)) as well as information on select Grading, Certification, and Verification for additional information on this topic.

<sup>45</sup> Available at [www.fns.usda.gov/tn/food-buying-guide-school-meal-programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).



the menu item to the meat/meat alternate component.

Solution:

- List serving size or proper utensil to be used on production record as well as a recipe card.
- Monitor meal service and production records for unexpected leftovers or shortages.
- Provide staff training on using appropriate serving utensils

4. Cooked dry beans or peas (legumes) are used as meat alternate and a vegetable in the same meal.

Solution:

- Remember to offer Dry Beans/Peas (Legumes) in sufficient amounts at other times in the week when using cooked dry beans or peas (legumes) as the meat/meat alternate in a menu item, such as chalupas.
- Provide adequate separate servings of beans when offering them as both a meat/meat alternate and a vegetable within the same meal.

## Milk Component of the Reimbursable Lunch

Unflavored and flavored fat-free and low-fat (1%) milk may be offered as part of the reimbursable meal for children in grades K to 12. If a site serves a flavored milk choice, the site must also serve an unflavored milk choice at the meal service.

All milk served must be fluid types of milk that are pasteurized and meet state and local standards for milk. The milk shall contain vitamins A and D at levels specified by the FDA and consistent with state and local standards. To meet the nutrition standards, it is recommended that fluid milk with the lowest fat and sugar content be offered.

No matter what type of meal service is used,<sup>46</sup> every reimbursable meal must include a choice of milk.

### Lactose-Free Milk

CEs may serve lactose-free milk as long as it meets the following criteria:

1. Is unflavored or unflavored one percent low fat or fat-free milk
2. Meets the flavor and nutritional requirements.

### Organic

CEs may offer all students milk labeled as organic milk or offer milk produced from cows not treated with hormones. However, CEs are not required to honor a request to substitute a type of milk or offer organic milk or offer milk with a label indicating it was produced from cows not treated with hormones.

## Requirement to Take Milk

If the site does not use OVS, a reimbursable meal must include milk or an acceptable milk substitute, except as determined to be necessary for a student with a disability, for a reimbursable meal.<sup>47</sup> Under OVS, a meal without fluid milk is reimbursable.

CEs must not promote other beverages, including water, as an alternative to fluid milk in the service line. Water should be offered after the student has the option to select milk, and signage should be clear that water is not a meal component.

<sup>46</sup> See *Administrator's Reference Manual (ARM)*, Section 21, *Meal Service* for more information on types of meal service.

<sup>47</sup> See the *Milk and Children with Disabilities or Other Dietary Issues* subsection in this section for additional information.

## Guidance for Offering Milk and Other Beverages

The CE must adhere to the following guidance in offering milk and other beverages:

- The CE may not offer juice for free to students who refuse milk while charging an a la carte price for juice to other students who select milk as part of a reimbursable meal.
- The CE may offer milk as a component of the reimbursable meal and charge all students selecting juice an a la carte price for their juice.  
or  
provide all students with milk and a second beverage at no extra charge.

If CEs choose to offer one of these two options, CEs must make sure that students understand these options by publicizing information about the option/s.

- The CE may not offer students a choice among milk, tea (high school only),<sup>48</sup> and a fruit-flavored drink for a reimbursable meal.
- Any fluid milk and/or beverage that is served as part of the reimbursable meal must be included in the nutrient assessment for the meal—calories, sodium, and saturated and trans fat.
- Additional or extra beverages—100 percent juice, water, iced tea (high school only),<sup>49</sup> etc.—may be offered after the POS, but these beverages must be included in the dietary specifications for the week. Any 100 percent juice offered after the POS must count toward the weekly juice limit.
- Additional or extra beverages, including water, must be placed in such a way that they do not discourage students from taking milk.

## Fluid Milk Substitutes

A CE has the option to offer a nondairy milk substitute of its choice to a student with a non-medical or a special dietary need that is not a disability.<sup>50</sup> If a CE chooses to offer a nondairy milk substitute for students who do not have a medical disability, it must make that substitute available to all students.

Non-dairy beverages (milk substitutes) must be nutritionally equal to milk and meet the nutritional standards for fortification of calcium, protein, Vitamin A, Vitamin D, and other nutrients to levels found in cow's milk, as outlined Food and Drug Administration (FDA). If CEs offer a milk substitute, they must notify TDA about the milk substitute product.<sup>51</sup>

### Milk Substitute Specifications

If CEs choose to offer a milk substitute, they are not required to offer a choice of acceptable milk substitutes. However, any nondairy beverage offered as a milk substitute must be nutritionally equivalent to fluid milk as demonstrated by the nutritional profile

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<sup>48</sup> See the *Administrator's Reference Manual (ARM)*, Section 22, *Competitive Foods* for additional information on this topic.

<sup>49</sup> See the *Administrator's Reference Manual (ARM)*, Section 22, *Competitive Foods* for additional information on this topic.

<sup>50</sup> See *Administrator's Reference Manual (ARM)*, Section 25, *Meal Accommodations* for more information on parent requests for milk substitutes.

<sup>51</sup> See the Contact Information for the Texas Department of Agriculture (TDA), Food and Nutrition box located after the table of contents for this section.

of the product. See the *Milk Substitute Nutritional Profile Chart* for specific nutritional information for milk substitutes.

Milk Substitute Nutritional Profile Chart (mg=milligram; g=gram; mcg=micrograms)	
Nutrient	Minimum Amount Per 1 Cup Serving as Reported on Product Documentation
Calcium	≥ 276 mg
Protein	≥ 8 g
Vitamin A	≥ 150 mcg
Vitamin D	≥ 2.5 mcg
Magnesium	≥ 24 mg
Phosphorus	≥ 222 mg
Potassium	≥ 349 mg
Riboflavin	≥ 0.44 mg
Vitamin B-12	≥ 1.1 mcg
<p>The fat content of fluid milk substitutions, such as soy milk are not subject to the regulations regarding fat content that apply to regular fluid milk. Therefore, fluid milk substitutions can have a higher fat content than fat-free or 1% milk.</p> <p>A manufacturer's signed statement may be used to provide nutrient information for milk substitutes.</p>	

TDA has developed the *Fluid Milk Substitute Worksheet*<sup>52</sup> for CEs to use to notify TDA that the CE is using a milk substitute that contains the required nutritional values. However, if the CE offers lactose-free milk as a creditable component of a reimbursable meal, the CE is not required to submit notification to TDA.

### Special Guidance, Milk Substitutes

CEs must use the following guidance when using a milk substitute.

#### Lactose-Reduced Milk

If a student requires lactose-reduced milk, the SNP may provide lactose-reduced/lactose-free milk as a creditable part of a reimbursable meal without additional documentation.

#### Milk and Children with Disabilities or Other Dietary Issues

For a child with a recognized disability, the meal may consist of fewer than 5 components. The child may be served as an alternate beverage if so prescribed by a licensed physician.<sup>53</sup> If the CE does not offer an acceptable milk substitute for children without disabilities, the child has to take the fluid milk for the meal to be reimbursable if the CE does not use OVS.

#### Nutrient Analysis of Milk Substitutes

Milk substitutes offered as part of the reimbursable meal must be included in the weighted nutrient analysis and, therefore, are subject to the overall weekly average fat limit and calorie ranges of the meal pattern.

#### Recombined/Reconstituted Milk Dispensed from a Machine

CEs may serve recombined/reconstituted milk dispensed from a machine to meet the milk component requirement for lunch as long as the following criteria are met.

<sup>52</sup> Available at [www.SquareMeals.org](http://www.SquareMeals.org).

<sup>53</sup> See *Administrator's Reference Manual (ARM)*, Section 25, *Meal Accommodations*, located at [www.SquareMeals.org](http://www.SquareMeals.org) for additional information regarding disabilities and milk substitutions for other reasons.

The recombined or reconstituted milk (1) is combined with water so that it meets the requirements to be a *recombined milk* or *reconstituted milk*, (2) meets the nutritional requirements for fluid milk, and (3) meets the local and state standards for pasteurized fluid milk.

#### Water

Water is not an acceptable substitute for fluid milk. Only a nondairy beverage meeting the nutrient standards can be substituted for fluid milk.<sup>54</sup>

## Smoothies

At lunch, the following ingredients may count toward meeting the food component requirements:

Crediting Smoothie Ingredients Chart		
Ingredient	Minimum Crediting Amount	Component
Pureed fruit	1/8 cup	Fruit Component, counted as juice
Pureed vegetable	1/8 cup	Vegetable Component by Subgroup, counted as juice
One percent or nonfat flavored or unflavored fluid milk	1/4 cup	Milk Component
Dairy or soy yogurt	1 oz as .25 oz eq (about 1/4 cup)	Meat/Meat Alternate
All smoothie ingredients count toward the weekly dietary specifications.		

CEs must identify the components the smoothie contains on the serving line.

USDA recommends that CEs serve smoothies for only one meal per day. Menu planners also need to remember that smoothies count toward weekly juice, calorie, sodium, and fat totals.

TDA encourages program operators to offer additional food components on the serving line when smoothies are offered.

The requirements for smoothies prepared by program operators and those prepared by commercial companies are the same.

### Components Allowed in Smoothie

Smoothies made by program operators and commercially prepared smoothies may count toward the required fruit, vegetable, meat/meat alternate, or milk components. All ingredients in a program operator prepared smoothie count toward the weekly limits on juice, calories, fat, and sodium. These smoothies may be prepared ahead of time or at the time of service.

- Fruit Component.** To credit toward the fruit component, the smoothie must contain the minimum creditable amount of 1/8 cup of fresh, frozen, canned, 100% fruit juice, and/or a 100% juice blend of fruit or vegetables.
  - Credited amounts of fruit in a smoothie count as a juice serving. Juice offerings in smoothies are added to the weekly total of juice offered.
  - Pureed fruit is measured by volume amount served.<sup>55</sup>

<sup>54</sup> See *Administrator's Reference Manual (ARM)*, Section 25, *Meal Accommodations* for additional information on this topic.

<sup>55</sup> There are two sources that provide information to assist CEs in determining the volume amount served for pureed items: *Food Buying Guide for Child Nutrition Programs*, including the introduction that contains information about how to obtain in-house yield data, and a manufacturer's product formulation statement.

- Blended fruit and vegetable puree or 100% juice may count as a fruit if the fruit is the most predominant ingredient.
- **Vegetable Component.** To credit toward a vegetable serving, the smoothie must contain the minimum creditable amount of  $\frac{1}{8}$  cup of fresh, frozen, canned, 100% vegetable juice, and/or a 100% juice blend of fruit or vegetables.
  - Credited amounts of vegetables in a smoothie count as a juice serving. Juice offerings in smoothies are added to the weekly total of juice offered.
  - Pureed vegetables are measured by volume.
  - Blended vegetable puree or 100% juice made of vegetables from a single subgroup may count toward the weekly offerings of that subgroup.
  - Blended vegetable puree or 100% juice made of vegetables from more than one subgroup may count toward the weekly offering of the Additional vegetable subgroup.
  - Blended vegetable and fruit puree or 100% juice may count as a vegetable if vegetables are the most predominant ingredient; it may count toward the weekly offering of the Additional vegetable subgroup.
  - Dried beans or peas may credit as vegetable juice in smoothies
- **Milk.** To credit as the milk component, the smoothie must be made of 1 percent unflavored fluid (not powdered) milk or fat-free unflavored or flavored fluid (not powdered) milk.
  - Smoothies do not have to contain the full cup serving (8.0 fl oz) of milk. The minimum creditable amount of milk is  $\frac{1}{4}$  cup.
  - Even if the smoothie contains a 1 cup serving (8.0 fl oz) of milk, the CE must still offer a full 1 cup serving of two types of milk on the serving line.
- **Meat/Meat Alternate.** To credit yogurt as a meat/meat alternate component, the smoothie must contain the minimum creditable amount of yogurt—1 oz of yogurt credits as .25 oz eq of meat/meat alternate.
  - Soy or dairy yogurt may be credited.

## Guidance about Smoothie Content and Crediting

All smoothies must be served under the following guidance:

- **Amount of Fruit or Vegetable.** Crediting fruit or vegetables in a smoothie is determined by volume. Volume for fruit or vegetables in a smoothie is based on the pureed amount of the ingredient. If the pureed ingredient is not listed in the *Food Buying Guide for Child Nutrition Programs*,<sup>56</sup> the program operator should determine the crediting amount based on the volume after pureeing the fruit or vegetable.
- **Concentrated Fruit Puree.** Smoothies with concentrated fruit puree can only be used in meeting the meal pattern requirements when they are reconstituted to the full-strength fruit puree. Without being reconstituted to the original strength, concentrated fruit puree is considered to be added sugar and cannot be credited toward the fruit/vegetable component.
- **Dietary and Herbal Supplements.** Smoothies with dietary and herbal supplements are not credible. However, smoothies made with juice that has been fortified with vitamins and minerals such as orange juice with calcium and Vitamin D added may credit.
- **Juice in Smoothies.** Juice in smoothies may be fortified with vitamins and minerals.

For Example: Orange juice fortified with calcium and Vitamin D.

Because smoothies contain juice as well as other ingredients, smoothies with less than 100 percent juice content are the only example of when less than 100% juice may be offered and credited as a fruit or vegetable component.

For Example: An 8.0 oz smoothie beverage made from peach puree with the juice content labeled as “contains 50% juice” would credit as 4 fl oz or ½ cup of juice as long as the 4 fl oz or ½ cup of juice is 100% juice.

- **Offering Fluid Milk.** The milk in a smoothie must not be offered in place of a serving of fluid milk. Even if the smoothie contains a full 1 cup of milk, the CE must still offer the milk component as a separate item on the serving line.
- **Other Items in Smoothies.** Grain items such as oatmeal or meat/meat alternates such as peanut butter do not contribute to the meal pattern requirements. However, all ingredients in smoothies must be counted toward the weekly limits on juice, calories, fat, and sodium.

## Common Problems: Milk

1. Milk is placed on the tray of students in lower grades, thus not allowing them to make a choice.

Solution: Allow each student to select his/her own milk.

2. Milk is offered as a choice against another beverage.

Solution: There is no substitute for milk; therefore, it can never be offered as a choice against another food or beverage.<sup>57</sup>

3. The CE is temporarily unable to obtain a supply of milk.

Solution: If emergency conditions temporarily prevent a CE from having milk available, TDA may approve the service of lunches during the emergency period

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<sup>56</sup> Available at [www.fns.usda.gov/tn/food-buying-guide-school-meal-programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).

<sup>57</sup> See *Administrator's Reference Manual (ARM)*, Section 25, *Meal Accommodations*, located at [www.SquareMeals.org](http://www.SquareMeals.org) for additional information regarding disabilities and milk substitute.

without milk. Contact TDA as soon as possible prior to the meal service.

## Traditional Foods

CEs that primarily serve Indian populations are allowed to accept the donation of traditional foods and serve traditional foods<sup>58</sup> as part of the school nutrition program. Traditional foods are defined as food that has traditionally been prepared and consumed by an Indian tribe which includes the following types of food:

- Wild game meat
- Fish
- Seafood
- Marine mammals
- Plants
- Berries

To make use of these products, the CE must make sure the following requirements are met:

- Ensure that the food received is whole, gutted, gilled, as quarters, or as a roast, without further processing.
- Make a reasonable determination that
  - the animal was not diseased;
  - the food was appropriately butchered, dressed, transported, and stored to prevent contamination, undesirable microbial growth, or deterioration; and
  - the food will not cause a significant health hazard or potential for human illness.
- Carry out any further preparation or processing of the food at a different time or in a different space from the preparation or processing of other food for the applicable program to prevent cross-contamination.
- Clean and sanitize food-contact surfaces of equipment and utensils after processing the traditional food.
- Label donated traditional food with the name of the food item.
- Store the traditional food separately from other food for the program, including through storage in a separate freezer or refrigerator or in a separate compartment or shelf in the freezer or refrigerator.
- Follow Federal, State, local, county, Tribal, or other non-Federal law regarding the safe preparation and service of food in public or nonprofit facilities.
- Follow other such criteria as established by the Secretary of Agriculture and Commissioner of the U.S. Food and Drug Administration.

## Menu Substitutions

A *substitution* is made or required whenever a planned food item is not available to be served for any reason. When a substitution must be made, the new food item must (1) be within the same

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<sup>58</sup> The *Food Buying Guide for School Nutrition Programs* will be updated to allow the use of donated traditional foods in school nutrition programs that primarily serve Indian populations.



food component group or subgroup as the original item and (2) match the daily and weekly contribution of the item that is replaced. CEs are required to record menu substitutions daily on documentation related to meal service.<sup>59</sup>

For the purposes of meeting the meal pattern requirements, a similar food item will mean that at the site level, the substitution is from the same food component group and provides the same component contribution and subgroup, if applicable, requirement and/or provides an equivalent meal contribution.

For Example: Menu Substitution Examples

Example 1: The September 14 menu calls for orange wedges. The supplier informs the CE that they have no oranges to ship to the CE. The menu planner decides to substitute apple wedges for that day's menu.

Is this an appropriate substitution?—Yes, since both apples and oranges can be menued to meet the fruit component requirement.

Example 2: On September 18, there are 20 servings of rice leftover. The cook freezes the leftovers. On September 24, the campus runs out of rolls to serve with the baked chicken. The cook reheats the leftover rice and serves it with the chicken.

Is this an appropriate substitution?—Yes, rolls and rice both meet the grains component requirement, so this is an appropriate substitute. The CE must evaluate the amount of grain contribution each item provides.

Example 3: The September 29 menu calls for baby carrots. Because of distribution shortages, the CE did not receive enough product for 10% of its campuses. The food manager substitutes canned green beans for the baby carrots because the CE has a large stock of green beans.

Is this an appropriate substitution?—No, the baby carrots were menued to meet the Red/Orange vegetable requirements. However, if the CE chooses to reformulate its menu for that week, the CE may serve canned green beans as a substitute for the carrots as long as the CE offers a Red/Orange vegetable later in the same week.

### **Substitution, Emergency Situation**

When food substitutions are made because of an emergency situation (i.e., food shortage), it is important that the meal pattern component requirements are maintained. A menu substitution should be the same component category and same subgroup if a vegetable.

## **Reimbursable Lunch Requirements**

A student's reimbursable meal is determined by how each item is menued. When not using OVS, for a reimbursable lunch, the CE must serve food items which contain the following five food components:

- Fruit
- Vegetables
- Grains
- Meal/Meat Alternates
- Milk

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<sup>59</sup> See *Administrator's Reference Manual (ARM)*, Section 30, *Records Retention* for more detailed information on this topic.

## Special Guidance for Reimbursable Meals

### Combination Foods Containing More Than One Component

A food item may contain one or more components. The menu planner may include menu items that are combination foods that consist of more than one component.

- A menued combination item may contain the full minimum serving of more than one food component—In this case, each component in the combination item will credit toward a reimbursable meal.  
For Example: A turkey sandwich contains 1.0 oz eq serving of grain and a 1.0 oz eq serving of meat/meat alternate.
- Several menued combination items may be added together to contain the full minimum servings of more than one food component—In this case, full minimum servings of the included components are split across several combination foods, so the student must take the corresponding combination foods for a reimbursable meal.

### Double Servings

Double servings of components or food items are allowed for fruit or vegetable and grain, and meat/meat alternate components in order to meet the minimum portion size requirement as long as the menu planner has noted this option on the menu.

For Example: A student is offered 1 cup of milk, 1 cup of fruit, 1.0 oz eq cereal, and 1.0 oz eq toast. The student may take ½ cup of fruit and two 1.0 oz eq servings of toast for a reimbursable meal. In this case, the student had a choice of combinations offered for the meal.

### Field Trips

Field trip meals will be viewed as part of the overall week's menu requirements just as if they were meals served at a CE site.

### Free or Extra Food Offered After the Point of Service (POS)

Any additional food offered at no charge to students who have a reimbursable meal must count toward the weekly dietary specifications. This includes a serving of juice provided at no charge. Juice provided to students at no charge also counts toward the weekly limitation.

### Large Food Items

The menu planner may menu a large food item as two items as long as each part meets the minimum requirement for that food component.

For Example: The menu planner designates a large apple to credit as two ½ cup servings of fruit with each of the ½ cup servings counted as an individual food item.

### Leftovers

Occasional, small quantities of leftover food served on another day will not be counted toward the meal pattern requirements, including the vegetable subgroups. However, if this practice occurs commonly and the quantities are not reasonable based on the number of students to be served, the leftovers must be included in the weekly dietary specifications.

### OVS

Under OVS, the CE must offer food items containing all five components, and the student must take food items that contain at least three of the food components, including a minimum serving of ½ cup of fruit or vegetable.

### OVS, Extra Food Items

A school may offer Extra food items, such as ice cream or pudding, which are not creditable. These foods may complement a reimbursable meal or entice students to purchase a meal. Extra food items do not credit toward the minimum number of food components/food items a school is required to offer under OVS. However, Extra food items must be included in a nutrient analysis to assess compliance with the weekly dietary specifications (calories, saturated fat, and sodium).

### Refusing an Item

Even if a CE is not using OVS, a student may refuse to take any food items. However, the meal is only reimbursable if the student takes enough of the components for the meal to qualify as reimbursable. If allowing OVS, the student must take three of the five components, and one of the three components must be a minimum of a ½ cup serving of fruit and/or vegetables for a student’s meal to be reimbursable.

[NOTE: When a student refuses a menu item, the student may be refusing a single component or may be refusing more than one component. As the student moves through the service line, he or she needs to know what components are in each menu item in order to choose a reimbursable meal. The cashier also needs to know what components are contained in each menu item in order to identify a reimbursable meal.<sup>60</sup>

For Example: A hamburger may include ingredients that count toward the grains and meat/meat alternate components as well as vegetable component subgroups. By declining the hamburger, the student’s meal may not be reimbursable unless there are other items offered that will fulfill the requirements for the grains, meat/meat alternate components, and vegetable component subgroups.]

The CE does have additional discretion in how to handle a situation when a student refuses a food item/component. The following guidance describes a CE’s options:

- CEs are not required to offer another food item should a student refuse one of the food items/components in the meal.
- CEs may offer a student the option to purchase food items a la carte when food items taken do not make a reimbursable meal. Any student who has the money either in hand or in his/her account may purchase food a la carte. However, in these cases, serving staff must prevent the overt identification of the eligibility status of the students.
- CEs may allow the student to take the food for free and not claim the meal for reimbursement.

If a student refuses to take the required food item/s for a reimbursable, the meal is not reimbursable. To address this situation, the CE must have a policy in place regarding a student’s selection of incomplete meals. If the school’s policy is not to serve non-reimbursable meals and not to offer other food options, this policy must be communicated to students and parents in advance.

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<sup>60</sup> See the *Lunch Menu Planning* subsection in this section for additional information on food items, food components, and menu items.

## Seconds or Additional Servings

When a student is served a reimbursable meal, and the student asks for seconds or additional servings, the CE has two options in addressing this situation:

1. The student may be given the seconds or additional servings. Seconds and additional servings must count toward the weekly requirements, including dietary specifications.
2. The student may be asked to pay for the additional servings a la carte. If the student is provided seconds or additional servings and pays for the extra serving as an a la carte purchase, the additional servings do not count toward the weekly dietary specifications for reimbursable meals.

[NOTE: Additional or extra food offered to students at no charge who have a reimbursable meal does count toward the dietary specifications—calories, sodium, and saturated and trans fat. If the items are creditable toward a food component, the additional food counts toward the weekly requirements.]

## Student Identification of a Reimbursable Meal

For the purpose of identifying a reimbursable meal at the POS, the menu planner must provide students and cashiers with details about the various combinations of menu items (including the various entrees) that may constitute a reimbursable meal to ensure the accuracy of meal counts.

A CE may use a variety of methods to assist students in identifying what food items are required for a reimbursable meal. At a minimum, the CE must clearly communicate this information in an area located near or at the beginning of the serving line. The following strategies are commonly used for this purpose:

- **Signage**  
Signage, including menu boards, that communicates what food items must be taken for a reimbursable meal.
- **Labels, Pictures, or Symbols**  
Label, pictures, or symbols that indicate which items are required for a reimbursable meal posted in the serving area (such as on sneeze guard).<sup>61</sup>
- **Other Communications**  
Information the requirements for a reimbursable meal (and specifically OVS) as published in menus, newsletters, communications with parents, or updates posted on websites.
- **Field Trips**  
Signage is not required for field trips. However, if choices are offered in these situations, CEs need to implement a method to inform students that OVS is being used and what to select for a reimbursable meal.
- **Other Service Options**  
When a CE uses other service options, such as offsite meals for students in college credit programs, the CE needs to ensure that students are provided information about what items are required for a reimbursable meal. If choices are offered in these situations, CEs need to implement a method to inform students that OVS is being used and what to select for a reimbursable meal.

This includes information that allows students to select the correct quantities, including

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<sup>61</sup> USDA provides examples of strategies to promote student identification of reimbursable meals at [www.choosemyplate.gov](http://www.choosemyplate.gov).

at least 1/2 cup of fruit or vegetables or a 1/2 cup combination of fruit and vegetables.

### Fruit(s) and Vegetable(s) Serving for a Reimbursable Meal

For a meal to be reimbursable, a minimum reimbursable serving of fruit and/or vegetable must be portioned as follows:<sup>62</sup>

1/2 cup fruit(s)*	or	1/2 cup vegetable(s)*	or	1/2 cup combination* of fruit(s) and vegetable(s)
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\* The minimum credible size portion—when combining fruits or vegetables of different types to achieve a minimum serving portion size—is 1/8 cup of any one fruit or vegetable item.

[NOTE: A minimum credible portion size is not the same as the minimum serving portion size for a reimbursable meal. A credible portion size counts toward meeting the minimum serving portion size.

For Example: A student is served a minimum credible size portion of apples—1/8 cup. Unless the student takes an additional portion of another fruit or vegetable so that a combined portion size of at least 1/2 cup of fruit, vegetable, or combination of fruit and vegetable is taken, the 1/8 cup of apples does not provide the minimum fruit or vegetable component for a reimbursable meal.]

Offering more than one type of fruit and vegetable food item in different serving sizes will help students make selections and ensure that the CE meets the meal pattern requirement.

The following guidance applies when a combination of fruit and vegetables are offered and selected.

- A CE may offer 1/2 cup of a dish consisting of different fruits (e.g., fruit salad), different vegetables (e.g., mixed vegetables) or a combination of only fruits and vegetables (e.g., carrot/raisin salad).
- A student may select 1/4 cup fruit (e.g., oranges) and 1/4 cup vegetable (e.g., broccoli) to meet the 1/2 cup requirement for the fruit and/or vegetable component under OVS. The student would not be required to select additional fruits or vegetables if the reimbursable meal under OVS includes two other components in full portion.
- If a student selects three components, and two of the three components are fruits and vegetables, the student may select a smaller serving of 1/2 cup of either fruit or vegetable, but the third component must be the full portion.

<sup>62</sup> The *How to Recognize a Reimbursable Meal Chart—Lunch* in this section provides examples of reimbursable and non-reimbursable meals.

The *Options for Meeting the Requirement for a Half (1/2) cup of Fruit and/or Vegetable Component(s) Chart* provides an illustration of the options a CE has in providing the fruit and vegetable components by serving or offering a single fruit, vegetable, or mixed fruits and vegetables.

Options for Meeting the Lunch Requirement for a Half (1/2)* Cup of Fruit and/or Vegetable Component(s) Chart <sup>63</sup>		
Option 1	1/2 cup fruit	
Option 2	1/2 cup vegetable	
Option 3	1/4 cup one fruit	+ 1/4 cup another fruit
Option 4	1/4 cup one fruit	+ 1/4 cup one vegetable
Option 5	1/4 cup one vegetable	+ 1/4 cup another vegetable
* 1/8 cup is the minimum creditable amount for the fruit or vegetable component. Menu planners may also combine multiple 1/8 cup portions of different fruits or vegetables to reach the 1/2 cup serving—1/8 cup pears and 3/8 cup carrots equal 1/2 cup.		

## Grains for Serving for a Reimbursable Meal

To count the grain as one food component, a full minimum daily portion of grain<sup>64</sup> must be taken.

Age/Grades	Minimum Per Day Grains (oz eq)*
K–5	1
6–8	1
9–12	2

The grain food component may be planned so that it comes from more than one food item.

For Example:

- Half (1/2) slice bread + 1/4 cup spaghetti = 1 grain
- One taco shell + 1/4 cup rice = 1 grain
- Four saltine crackers + 1/4 cup macaroni = 1 grain

A grain item may be counted only once in each reimbursable meal.

For Example: If a student selected 1/2 cup spaghetti and eight crackers, the items can only be credited toward meeting the grains component.

<sup>63</sup> At lunch for high school students and at breakfast for all students, a student must take the full serving of either fruit or vegetable if the reimbursable meal is a fruit, a vegetable, and one other component.

<sup>64</sup> CEs may use the *Food Buying Guide for Child Nutrition Programs*<sup>64</sup> to assist them in determining if grain servings are creditable as whole-grain rich. It is available at [www.fns.usda.gov/tn/food-buying-guide-school-meal-programs](http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs).

### **Meat/Meat Alternate Serving for a Reimbursable Meal**

The meat/meat alternate may be served in one menu item, in split menu items, or in a main dish plus one or more other menu items. If the meat/meat alternate is split between menu items, both items must be taken in order for the meat/meat alternate to count as one of the five food components.

For Example: For grades 9-12, the menu planner creates a menu that splits the required minimum meat/meat alternate between two menu items—soup with 0.5 oz eq of meat/meat alternate and ½ cup of vegetables and 1.5 oz eq in a grilled cheese sandwich with 1.5 oz eq of meat/meat alternate and 2.0 oz eq of grains. In this case, the student must take both the soup and sandwich to get a full serving of meat/meat alternate, 2.0 oz eq.

In this case, if a student selects the soup, the meal does not have a full minimum serving of meat/meat alternate. However, the student may still have a reimbursable meal if the student takes complete servings of three other components.

### **Milk Serving for a Reimbursable Meal**

In order to count milk as a food component, 1 cup of fluid milk must be taken. CEs that do not offer an approved fluid milk substitute can offer both fluid milk and water; however, water does not substitute for fluid milk in determining a reimbursable meal.<sup>65</sup> A meal without fluid milk is reimbursable under OVS.

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<sup>65</sup> See *Administrator's Reference Manual (ARM)*, Section 25, *Meal Accommodations* for additional information on this topic.



## Reimbursable Meal Determination

While a student may choose to take a smaller portion of any component, the smaller portion does not count toward a reimbursable meal with the exception of a minimum serving of fruit and/or vegetable.<sup>66</sup>

The *How to Recognize a Reimbursable Meal Chart—OVS Lunch* provides a snapshot of the choices students have in selecting the three components.

How to Recognize a Reimbursable Meal Chart—OVS Lunch						
Sample Meal Choices	Components					Is the Meal Reimbursable?
	Meat/Meat Alternates	Grains	Milk	Fruit*	Vegetable*	
	Student must choose at least <b>1</b> of these components.			Student must choose at least <b>1</b> of these components.		Student must choose a total of <b>3</b> components.
Choice 1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> ~	<input checked="" type="checkbox"/> ~	<b>YES~</b>
Choice 2	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>YES</b>
Choice 3	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>YES</b>
Choice 4	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>YES</b>
Choice 5	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>NO^</b>
Choice 6	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>NO+</b>
<p>* Students must be offered the full portion but may take a minimum of a ½ cup for a reimbursable meal.</p> <p>~ At lunch for high school students and at breakfast for all students, a student must take the full serving of either fruit or vegetable if the reimbursable meal is a fruit, a vegetable, and one other component.</p> <p>^ The student did not take a fruit or vegetable, so the meal is not reimbursable.</p> <p>+ The student did not take 3 components, so the meal is not reimbursable.</p>						

<sup>66</sup> See the *Fruit and Vegetable Components of the Reimbursable Lunch* subsection in this section for additional information on this topic.

## Nutrient Standards

Menus must meet the dietary specifications for calories, sodium, and saturated and trans fat for each age/grade group. The *Lunch Nutrient Standard Chart* provides a range for the average amount for each of the nutrient standards for the week. CEs are expected to determine if they are meeting the dietary specifications by averaging the number of calories, sodium, and saturated fat over the serving week.

Lunch Nutrient Standard Chart				
	Age/Grades K-5	Age/Grades 6-8	Age/ Grades 9-12	Age/Grades K-8
Min-Max Calories (kcal) <sup>h, i</sup>	550-650	600-700	750-850	600-650
Saturated Fat (% of total calories) <sup>i</sup>	< 10	< 10	< 10	< 10
Sodium Target 1 (mg) <sup>i, j</sup>	≤ 1230	≤ 1360	≤ 1420	≤ 1230
Trans Fat <sup>k</sup>	Nutrition label or manufacturer specification must indicate zero grams of <u>trans</u> fat per serving			

<sup>h</sup> The average daily amount of calories for a 5-day serving week must be within the range (at least the minimum and no more than the maximum values).

<sup>i</sup> Discretionary sources of calories (solid fats and added sugars) may be added to the meal pattern if within the specifications for calories, saturated fat, trans fat, and sodium. Foods of minimal nutritional value and fluid milk with fat content greater than 1 percent milk fat are not allowed.

<sup>j</sup> See *Sodium Limits and Timeline—Lunch* table for additional information.

<sup>k</sup> Less than 0.5 grams per serving.

### Calculating Dietary Specifications for the Week.

CEs calculate the dietary specifications by averaging the daily calories, sodium, and saturated fat. The weekly average must fit within the specifications for calories, sodium, and saturated fat. CEs must use Child Nutrition (CN) Labels, Nutrition Fact Labels, and/or product formulation statements for each food item to perform these calculations.<sup>67</sup>

If the CE Serves All Students the Same Meal,

the CE adds the total calories, sodium, and saturated fat for each day of the week to get the weekly total and then divides by the number of days to get the average daily amount for the week.

If the CE Gives Students a Choice of Multiple Entrees and Side Items or Lines,

the CE averages of the calories, sodium, and saturated fats across the items for each day; adds the average calories, sodium, and saturated fat for each day to get the weekly total; and divides by the number of days in the week to get the average daily amount for the week.

<sup>67</sup> See the *Administrator's Reference Manual (ARM)*, Section 23, *Food Product Labeling* for detailed information on this topic.

If the CE includes non-credible items in its menu, these items must be included in the dietary specification calculations.

#### To Determine Dietary Specifications

##### Step 1:

Divide the weekly total for the dietary specification—calories, sodium, and saturated fat—by the number of serving days for the week

$$\frac{\text{Weekly Total for the Dietary Specification}}{\text{Number of Serving Days for the Week}} = \text{Average Daily Amount for the Nutrient Standard}$$

##### Step 2:

Repeat this calculation for each dietary specification.

##### Step 3:

Compare the average daily amount for each dietary specification to the required range for each dietary specification in the Nutrient Standard Chart.

If the average daily amount for the nutrient standard falls within the range for the dietary specification, the CE has met the requirements for that dietary specification.

### Calculating Dietary Specifications for a Single Condiment or Accompaniment for a Designated Menu Item

If condiments or accompaniments are not pre-proportioned or pre-packaged for a designated menu item, the CE must include the dietary specifications for the average serving—that is dividing the total amount served by the number of servings taken.<sup>68</sup>

Calculation Condiment or Accompaniment Amount Chart		
Average Portion Size		
Total Amount for All Portions Served	Number of Servings	Average Accompaniment Portion Size
48 oz	55	.818

After calculating the average portion size, the CE will determine the dietary specifications for the portion size and add this amount to the weekly dietary specification totals.<sup>69</sup>

### Choice Among Various Condiments or Accompaniments for a Designated Menu Item

If condiments or accompaniments are not pre-proportioned or pre-packaged for a designated menu item and the student is allowed to select from among various condiments or accompaniments, the CE must take the following actions to calculate the dietary specifications:

1. Calculate the average portion size for each condiment or accompaniment that is provided.
2. Determine the dietary specifications for each condiment or accompaniment.
3. Average the dietary specifications for all condiments or accompaniments.
4. Add the average to the weekly dietary specifications total.<sup>70</sup>

<sup>68</sup> See the *Administrator's Reference Manual (ARM)*, Section 22, *Competitive Foods* for additional information related to accompaniments or condiments intended to be used with a beverage or food item that is sold.

<sup>69</sup> CEs must retain calculations records that demonstrate established averages with meal production records.

<sup>70</sup> CEs must retain calculations records that demonstrate established averages with meal production records.

### Extra Items Served after the Point of Service

The CE may offer extra items beyond the point of service. This may include, but is not limited to, condiments, 100% juice, or tea. However, these items must be included in the calculation for the weekly dietary specifications even if these items are *free*. If the extra item is intended to be consumed with the reimbursable meal, it is part of the reimbursable meal.

If 100% juice is offered as an extra item, the 100% juice counts toward the maximum weekly amount of juice for the week.

### Calories

Lunches offered to each age/grade group must average over the serving week to a range between the minimum and maximum calorie levels specified in the *Nutrient Standard Chart*.

### Saturated Fat

Lunches offered to all age/grade groups must average over the serving week to provide less than 10 percent of total calories from saturated fat.

### Sodium

Lunches offered to each age/grade group must average over the serving week to reflect the levels of sodium specified in the *Lunch Nutrient Standard Chart*. Sodium targets will be phased in.

The following timeline shows the implementation of the sodium targets over various SYs:

Sodium Limits and Timeline Chart—Lunch		
Age/Grade Groups	Target 1: SY 2022 - 2023	Target 1A: SY 2023 - 2024
K-5	≤ 1230 mg	≤ 1110 mg
6-8	≤ 1360 mg	≤ 1225 mg
9-12	≤ 1420 mg	≤ 1280 mg

### Trans Fat

Nutrition label or manufacturer specification must indicate that each menu item contains zero grams of trans fat per serving. Nutrition labels indicating less than 0.5 grams per serving are acceptable. Naturally occurring trans fat found in products such as beef, lamb, and dairy products made with whole milk is excluded from the trans fat requirement.

#### Commercially-Prepared Products

For commercially-prepared products, CEs must refer to the nutrition facts label or a 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 or synthetic trans fats (partially hydrogenated oil), the CE must determine if the product is in compliance by requesting information from suppliers on how much of the trans fat is naturally occurring versus if any of the ingredients contain added (synthetic) trans fat.

#### Nutrition Labels and Manufacturer Specifications

CEs must rely on nutrition labels and manufacturer product formulation statements to determine the specifications for the amount of trans fat in a food. Nutrition facts labels and/or manufacturing specifications must be available during an administrative review to verify food items served are trans fat free.

## Nutrition Software

Software may be used for the analysis of trans fat for information purposes only; however, current nutrition databases do not have complete data for trans fat. Therefore, trans fat is not required in the nutrient analysis for the one-week of menus when using an approved software program. As more trans fat information becomes available, it will be included in the Child Nutrition Database, required by all USDA-approved software.

## Nutrition Goals

Menu planning is designed to meet specified nutrient levels for the various age/grade groups. The food-based menu planning system sets minimum daily and weekly amounts, and in some cases recommended maximum offerings, for each of the five food components. Calorie ranges and limits on sodium and saturated and trans fats are established for each of the three age/grade groups. The menu planner establishes what the entrees are and the serving sizes of the menu items.

## Nutrient Analysis of Meals

CEs are not required to conduct a nutrient analysis to ensure that they are meeting the nutrient standards. However, the CE may choose to do so. CEs that choose to conduct a nutrient analysis must adhere to the following guidance:

- The nutrient analysis must be conducted for all food items offered on each serving line.
- CEs may use any software program to conduct a nutrient analysis. However, if the CEs use SNP program funds to purchase nutrient analysis software, CEs must purchase USDA-approved nutrient analysis software. A list of USDA-approved nutrient analysis software is available at [www.fns.usda.gov/tn/usda-approved-nutrient-analysis-software](http://www.fns.usda.gov/tn/usda-approved-nutrient-analysis-software).<sup>71</sup>
- CEs may use the worksheets available for submitting menus to achieve certification of meal pattern compliance to do a simplified nutrient assessment of menus.<sup>72</sup>

CEs may also request technical assistance from their education service center (ESC).

State agencies may also conduct a nutrient analysis as part of the administrative review.

[NOTE: Planned meals represent the CE's calculation of the items that will be prepared for a site's usual average daily participation (ADP). Ideally, the planned and the offered meals are the same, except for substitutions because of a product shortage, delivery failure, etc. TDA will review (or conduct) the nutrient analysis based on what is planned to correctly assess the calorie, saturated fat, and sodium levels in the meals.]

The nutrient analysis must include the following information:

- Calories
- Saturated fat, both in grams and percent of calories
- Sodium

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<sup>71</sup> Software developers of the currently approved programs must show USDA that they have made all the required changes before being moved to the list of Nutrient Analysis Software Approved by USDA for Administrative Reviews. New software developers must be evaluated by USDA and approved before being added to this list.

<sup>72</sup> Forms available at [www.SquareMeals.org](http://www.SquareMeals.org).

These are the nutrients that are monitored by TDA. These nutrients will be compared to the required dietary specifications for calories (minimum and maximum levels), sodium, and saturated fat. Trans fat is not included in the nutrient analysis since trans fat is not allowed. If it is included, the trans fat value will not be used to determine if the menus meet the dietary specifications for trans fat. Product nutrient labels or manufacturer specifications will be used to determine that the menued item contains no trans fat.

The Child Nutrition (CN) Database currently includes calories, sodium, and saturated and trans fat. Meal pattern information is not and will not be included in the CN Database.

### **Weighted Averages**

Planned menus must be analyzed and compared to the appropriate nutrient standard using weighted averages based on the planned servings of each menu item and condiment. Weighted averages must be used. Simple averaging is not allowed. A weighted nutrient analysis gives more weight to nutrients in popular foods that are more frequently selected by students. Weighted analyses allow for a greater contribution of nutrients to come from menu items that are selected more often and less nutrient contribution from those menu items selected less often.

CEs that conduct nutrient analyses of centralized menus will need to consolidate or aggregate production records for all menu items served in reimbursable meals in all of their sites in order to weigh the analysis. In weighted averaging, the total number of planned reimbursable meals with the planned number of servings for each menu item, excluding food items sold as adult meals and a la carte, is required for each menu.

### **Determining Planned Servings for Weighted Averages**

The nutrient analysis software system should perform the following tasks:

1. Calculate nutrients and provide a production record based on planned servings.
2. Estimate the number of projected servings based on past production records and meal counts.

The *Sample Estimate of Number of Servings Needed Chart* illustrates one method for determining the number of servings needed.

Sample Estimate of Number Servings Needed Chart (Based on Previous Serving Records)		
Meal Choice	Menu	Previous Number of Portions Served
Select One	Chicken Nuggets	600
	Fish Fillet	100
	Spaghetti/Meat Sauce	200
Select One	French fries	875
	Tossed Salad	325
	Carrots	350
	Broccoli	250
Select One	Applesauce	350
	Pears	250
	Orange Juice	150
Select One	Dinner Roll	400
	Hamburger Bun	100
	Garlic Bread	300
Select One	Nonfat Unflavored Milk	150
	1% Unflavored Milk	700
	Nonfat Chocolate Milk	50

The CE should conduct weighted averaging at the CE level if a centralized system of menus is used. A system to aggregate the data on the amounts that will be prepared for reimbursable meals from the individual sites is needed. If meal planning is done at the individual site level, weighting would be based on the amounts planned for reimbursable meals at that site.

### Processed Foods

When processed foods are used in menu planning, the nutrient analysis of these products either must be in the National Nutrient Database for Child Nutrition Programs or entered into the CE's local database. The nutrient analysis of the actual product must be used. CEs may obtain this information from the USDA's Child Nutrition (CN) label (CN Label) or the manufacturer product formulation statement. For more information on product labeling and manufacturer-created nutritional information sources, see the *Administrator's Reference Manual (ARM), Section 23, Food Product Labeling*.

## Standardized Recipes and Preparation Techniques

All CEs must develop and follow standardized recipes. Standardized recipes and preparation techniques must be used when planning and serving reimbursable meals. In order to qualify as a standardized recipe, a recipe must have an established and specified yield, portion size, and quantity. In addition, the ingredients must be constant in measurement and preparation.

Standardized recipes developed by USDA are in the Child Nutrition Database. Examples of standardized recipes are included in the USDA *Quantity Recipes for Schools* and the *New School Lunch and Breakfast Recipes...A Tool Kit for Healthy School Meals*.<sup>73</sup> The ESC Child Nutrition staff has copies of these resources. CEs may also use local or state standardized

<sup>73</sup> This resource and other recipe resources are available at [www.nutrition.gov/topics/shopping-cooking-and-food-safety/recipe-collection](http://www.nutrition.gov/topics/shopping-cooking-and-food-safety/recipe-collection).



recipes. If a CE uses its own recipes, the recipes must be added to its local database of recipes.

### Recipes for Salad or Theme Bars

Menu planners must make a recipe for each salad or theme bar listed on the menu. The salad or theme bar recipes are treated as another menu choice and averaged into the weekly nutrient analysis based on planned servings and portion sizes. If a student is able to select a reimbursable meal from the salad or theme bar, then, the menu planner must assure that the salad or theme bar menu meets all the components including subgroups and nutrient requirements of the meal pattern.

While there is no exact method for pre-planning portion sizes, menu planners are expected to use reasonable judgment in determining expected portion sizes.

For Example: A cup of lettuce would be a reasonable expectation for a portion size; a cup of radishes would not be a reasonable expectation.

The weekly recipe and nutrient analysis of the salad bar or theme bar is based on historical usage of the salad or theme bar items. The recipe should be constructed based on a typical day. The menu planner should take the following steps to determine the serving size and food ingredients for a salad or theme bar:

1. Determine the serving size.
2. Determine the number of servings the recipe produces.
3. Determine the amount of each food ingredient in the recipe.
  - Measure the amount of each ingredient placed on the salad or theme bar on a typical day.
  - Measure the amount of each ingredient leftover on the salad or theme bar at the end of the meal service.
  - Subtract the amount leftover from the amount placed on the salad or theme bar for each ingredient to determine the amount of each ingredient to enter for the recipe.or
  - Measure the amount of each ingredient placed on the salad or theme bar over the course of a week.
  - Measure the amount of each ingredient leftover on the salad or theme bar at the end of each day and add all the amounts for a total for the week.
  - Subtract the amount leftover from the amount placed on the salad or theme bar for each ingredient to determine the amount of each ingredient needed for the week.
  - Divide the remaining amount by the number of days in the serving week and use that average amount to determine a daily recipe.

### Minimize Plate Waste

CEs may use a variety of strategies to minimize plate waste, including OVS, taste tests, creative marketing, presentation of foods, and self-service bars. The following sources provide additional tips on minimizing plate waste:

TDA

*SquareMeals Website, Boost Meal Appeal—[www.SquareMeals.org](http://www.SquareMeals.org)*

## USDA

*Fruits and Vegetables Galore: Helping Kids Eat More—*

<https://www.fns.usda.gov/tn/fruits-vegetables-galore-helping-kids-eat-more>

*Kid-Friendly Veggies and Fruits—*[www.choosemyplate.gov/ten-tips-kid-friendly-veggies-and-fruits](http://www.choosemyplate.gov/ten-tips-kid-friendly-veggies-and-fruits)

*Smarter Lunchrooms—*<https://theicn.org/cnss/state-sharing-center/smarter-lunchrooms/>

## Water Availability During Meal Service

CEs participating in the NSLP are required to make potable water available to students at no charge in the place where lunch meals are served during the meal service. There are a variety of ways that sites can implement this requirement.

For Example: The CE can provide water through the following methods.

- Offer water pitchers and cups on lunch tables
- Allow students to use a nearby water fountain
- Allow students to fill personal water bottles or cups with drinking water
- Provide prefilled glasses of water offered on each line

Whatever solution is chosen, the water must be available to all students where meals are served.

While potable water is required to be made available to students, it is not considered part of the reimbursable meal. Students are not required to take water. If a CE sells bottled water, the CE must let students know that they may obtain water without a cost.<sup>74</sup>

Water may be served chilled or at room temperature; however, students may find the water more palatable if it is served chilled. The water must be served plain; therefore, adding flavoring, including fruit and vegetables, is not allowed.

## Location of and Access to Water

Potable water must be provided during meal service where reimbursable meals are served (including cafeterias, classrooms, courtyards, auditoriums, etc.). The location of the potable water must be in the meal service area or immediately adjacent to the meal service area. The water should be located so that it is offered after the student has the option to select milk. Signage should be clear that water is not a meal component.

For Example: A water fountain that is immediately outside the door of the meal service area (and is accessible to all students during the lunch period) would meet this requirement.

### Water Fountain

The water fountain must be operational and able to provide potable water to students in a reasonable time during their meal period. The CE must ensure that students have enough time to use the water fountain during their meal period. Students should not have to wait in long lines.

If a CE uses a water fountain to provide the students with potable water, it is allowed to require students to raise their hands to get up and go to the fountain. This method is not ideal. However, it may be used as long as it is used to provide order, and a student is not denied the opportunity to obtain water. All students should be able to use the water fountain in a timeframe that still allows enough time for consumption of the meal.

### Cups for Water

The CE must provide cups for students to get the water at no cost if the water is provided

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<sup>74</sup> See the *Milk Component* and *Fruit Component* subsections in this section for additional information on beverages served.

in a bulk container (i.e., a five-gallon dispenser).

- Students cannot be required to bring their own cups for water provided in a bulk container.
- Students may, at the decision of the CE, provide their own cups, bottles, or drinking vessels to fill with water. However, this must not be a requirement.
- CEs must not charge students for cups in order to access water as this would be considered restricting access to potable water.

This is not required if the site is using a water fountain to provide the water to the students.

### Reasonable Costs of Providing Water

Providing water would be an allowable cost to the nonprofit food service account. However, the cost must be reasonable. The cost must be a result of sound business practice and competitive prices. The cost must be reasonable, necessary, and allocable to the SNP to be an allowable cost. In determining whether a cost is a reasonable and necessary cost associated with providing water, a CE should ask the following questions:

- Would a prudent person find the cost to be reasonable?
- Is this cost at a fair rate or do alternatives exist that may be more cost effective?
- Is the cost a significant deviation from the established practices of the CE, which may unjustifiably increase costs borne by the nonprofit food service account?
- Could the CE defend this purchase to TDA?

For Example: The cost of providing pitchers or cups that would be filled with potable water from the faucet or providing them to students to fill with potable water from a faucet is a reasonable cost.

Some sites may want to provide water bottles to students or other alternatives. However, the CE would need to determine whether such an option would meet the requirements for an allowable cost (i.e. necessary, reasonable, and allocable) and meet the specific needs of the CE.

The cost of a five-gallon dispenser could be an allowable cost, as long as the CE has determined that providing water in a five-gallon dispenser would be cost efficient and practical.

Additionally, a cost is generally not reasonable if it adds materially to the value of the CE building and related facilities or appreciably prolongs its intended life, as those types of costs are capital expenditures and should be borne by the CE's general fund. While the cost associated with major plumbing would likely add to the permanent value of the building and is typically a cost that should be borne by the CE's general fund, the addition of a water fountain to allow for compliance with the statutory potable water requirement makes the cost acceptable. Moreover, equipment to filter water (e.g., a reverse osmosis filter system) could be reasonable depending on the cost, the need for such equipment and if the CE

1. has sufficient funds,
2. is lacking in capital improvement funding, and
3. is spending the funds necessary to carry out the mission of the program.

It is difficult to assess reasonableness without knowledge of the specific cost and an understanding of that cost. Many costs are analyzed on a case-by-case basis in order to determine if the cost is truly reasonable; in such cases, the CE should contact TDA for guidance.

## Providing Potable Water in Other School Nutrition Programs

### Seamless Summer Option (SSO)

CEs must make potable water available to students at SSO sites if the site is located at a school. Non-school sites are encouraged, but not required, to provide potable water.

### Afterschool Care Snack Program (ASCP)

Potable water is recommended during meal service at an ASCP.

### Water Dispensers, Food Safety

Water dispensers must be monitored and properly refilled and sanitized. CE staff would be responsible for maintaining all equipment which includes water dispensers.

## Meal Pattern Resources

### TDA Resources

#### Menu Planning Software

TDA provides free nutrition analysis software for CEs participating in NSLP and SBP. The MENU Module includes a variety of tools to assist with both menu planning and marketing. CEs can get additional information on this free software, from the following sources:

- TDA website at [www.SquareMeals.org](http://www.SquareMeals.org), (F&N Resources tab)
- CE's ESC child nutrition specialist

#### SquareMeals Website

TDA has developed the numerous resources to assist CEs in implementing the NSLP and SBP meal patterns that are available at [www.SquareMeals.org](http://www.SquareMeals.org) (F&N Resources tab):

- School Meal Success Stories
- Boost Meal Appeal
- Texas Farm Fresh

### TDA Forms

TDA provides template forms at [www.SquareMeals.org](http://www.SquareMeals.org). CEs are not required to use the forms provided by TDA for their records retention system unless specified, but TDA strongly recommends that CEs do so. In cases where CEs are allowed to develop their own versions of a record, CEs are responsible for making sure that all required information and elements included in the TDA forms are collected in the CE's version.

The following forms are available at [www.SquareMeals.org](http://www.SquareMeals.org):

- *Daily Food Production Record for Central Kitchen, Receiving Kitchen, and Onsite Kitchen*
- *Fluid Milk Substitute Worksheet*
- *Onsite Monitoring Form | National School Lunch Program*

## USDA Resources

USDA provides the following resources to assist CEs in implementing the NSLP and SBP meal patterns:

- *Food Buying Guide for Child Nutrition Programs*—Web-based interactive tool that assists in calculating food yields and provides purchasing information available at <https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>; USDA has also released the *Food Buying Guide for Child Nutrition Programs* as a mobile app. See the following website for additional information on the app: <https://www.fns.usda.gov/tn/food-buying-guide-mobile-app>
- *Smarter Lunchrooms* available at <https://theicn.org/cnss/state-sharing-center/smarter-lunchrooms/>
- *Tools for Schools* available at [www.fns.usda.gov/school-meals/tools-schools](http://www.fns.usda.gov/school-meals/tools-schools)
- *What's Shaking* available at [www.usda.gov/media/blog/2015/08/25/whats-shaking-school-meals](http://www.usda.gov/media/blog/2015/08/25/whats-shaking-school-meals)

The Institute of Child Nutrition (ICN)<sup>75</sup> also provides numerous online training materials and information materials<sup>76</sup>

Available at [www.theicn.org](http://www.theicn.org).

## Food Production Records

The CE must keep complete and accurate food production documentation including food production records, menus, records indicating food substitutions, invoices or receipts for food product purchases, and meal pattern contribution documentation for the meals they produce. Food production documentation demonstrates that the meals served and claimed met meal pattern requirements and are, therefore, reimbursable.<sup>77</sup>

While there is no one specific strategy for maintaining food production documentation, TDA recommends that each CE develop a system that aligns with its menu cycle.

For Example: A CE uses a four-week menu cycle. For each week, the CE has created a notebook that has a divided section for each serving day of the week. In each daily section, the CE has collected that day's food production documentation, standardized recipes, product labels or manufacturer product formulation statements, and other information.

CEs should use the following guidance in maintaining production records:

- CEs should keep in mind that this requirement includes all lunches including salad and other food bars, quick lines, sack meals, field trips, etc.
- These records must show how the meals offered contribute to the required food components and food quantities for each age/grade group every day including, but not limited to,
  - food item replaced,
  - substituted food item, and
  - reason for the substitution.

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<sup>75</sup> Formerly National Food Service Management Institute (NFSMI)

<sup>76</sup> ICN's materials are not regulatory

<sup>77</sup> See *Administrator's Reference Manual (ARM)*, Section 20, *Counting & Claiming* for additional information on the claims process.

- Any meal claimed for reimbursement must be supported by a food production documentation.
- When recording the amount of prepared food on a food production record, CEs should record amounts by purchased unit/container size. These reporting units are also used in the *Child Nutrition Program Food Buying Guide (FBG)*<sup>78</sup> The Shopping List function in the web-based (or app) FBG can also be used to quickly determine the number of servings in a unit/container.  
For Example, if a CE is planning to prepare 310 one oz eq servings of sausage, the CE will report the total amount prepared as 3 cases@96/case + 12. The sausage patties come 96 to the case.
- When recording the amount of leftover food on a food production record, CEs may record amounts by the number of remaining servings.

### Planned, Offered, and Selected/Served

CEs must use the following definitions as they prepare menus and food production documentation:

- *Planned.* A planned menu is what the menu planner intends to offer or serve to students. It represents the CE'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 or served meals are the same.
- *Offered.* An offered menu is what is actually prepared and set out on the serving lines for students to take. Offered or served menus may differ from *planned* menus when there are unexpected circumstances.  
For Example: A planned food item was not received from the distributor, and the menu planner had to offer a different food item.
- *Selected or Served.* Selected or served refers to the foods that were actually served to or selected by students. Menu planners should use selected or served food item data to inform future menu planning and reduce food waste, so the school does not offer items that students do not select. Production records should be updated to indicate actual selected or served food items after the meal service so that production records reflect serving trends.

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<sup>78</sup> Available at <https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>

## Records Retention

CEs must retain documentation about food production and service. All documentation or records must be kept on file for a minimum of five years for public and charter schools or three years for private schools, nonprofit organizations, and residential child care institutions after the end of the fiscal year to which they pertain. CEs have the option to maintain records on paper or electronically.

TDA may also request documentation for both offsite and onsite administrative review. CEs are encouraged to develop a system of document retention that allows them to readily retrieve documentation.

For more information on the specific types of documentation that are required, see *Administrator's Reference Manual (ARM)*, Section 30, *Records Retention*.

### Information Box 2

#### Records Retention

Public and charter schools are required to keep documentation related to school nutrition programs for 5 years.

Nonprofit private schools, other organizations, and residential childcare institutions (RCCIs) are required to keep documentation for 3 years.

## Compliance

The Administrative Review (AR) will include an assessment of food production documentation and a review of the lunch meal pattern and may include a nutrient analysis of menus.

TDA has the discretion to take fiscal action for the following violations:

- Not meeting the meal pattern requirements
- Not meeting food quantity requirements
- Not meeting nutrition standards
- Inadequate or unavailable documentation<sup>79</sup>

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<sup>79</sup> See *Administrator's Reference Manual (ARM)*, Section 23, *Food Product Labeling* for additional information on this topic.