

Section 9

Pre-Kindergarten Meals

Section 9, Pre-Kindergarten Meals

Update Guide

- January 4, 2022 Updated *Section 8, Pre-Kindergarten Meals* to incorporate the following United States Department of Agriculture (USDA) memos and guidance:
- *USDA Memo SP 11-2021, Consolidated Appropriations Act, 2021: Effect on Child Nutrition Programs - REVISED* (May 14, 2021)
- August 12, 2020 Updated *Administrator's Reference Manual (ARM), Section 9* to update *Administrator's Reference Manual (ARM)* section references.
Removed meal flexibilities no longer available.
- December 13, 2019 Updated *Section 11, Pre-Kindergarten (Pre-K) Meal Pattern for School Nutrition Program (SNP) Operators* to address typos in the meal pattern chart.
- October 4, 2019 Updated *Section 11, Pre-Kindergarten (Pre-K) Meal Pattern for School Nutrition Program (SNP) Operators* to incorporate the following United States Department of Agriculture (USDA) memos and guidance as well as incorporate Texas law:
- *USDA Memo SP 19, 2018, Clarifications on the Milk and Water Requirements in the School Meal Programs* (August 6, 2018)
- Provided clarification or information on the following issues
- Medical disabilities
 - Grain component
 - Meat/Meat alternate component
 - Juice
 - Offer versus serve (OVS)
 - Plated meal
- For clarification on the following memos use the guidance in *Administrator's Reference Manual (ARM) Sections 8, Breakfast* and *Section 9, Lunch*
- *USDA Memo SP 40, 2019, Smoothies Offered in the Child Nutrition Program* (September 23, 2019)
 - *USDA Memo SP 39, 2019, Clarifications on the Milk and Water Requirements in the School Meals Programs* (September 23, 2019)
 - *USDA Memo SP 38, 2019, Meal Requirements under the National School Lunch Program and School Breakfast Program: Questions and Answers for Program Operators* (September 23, 2019)
 - *USDA Memo SP 37, 2019, Questions and Answers on the Final Rule Child Nutrition Programs: Flexibilities for Milk, Whole Grains, and Sodium Requirements* (September 23, 2019)
 - *USDA Memo SP 34-2019, Crediting Coconut, Hominy, Corn Masa, and Mas Harina in the Child Nutrition Programs* (August 22, 2019)
 - *USDA Memo SP 26-2019, Crediting Pasta Products Made of Vegetable Flour in the Child Nutrition Programs* (April 17, 2019)
 - *USDA Memo SP 25-2019, Crediting Tempeh in the Child Nutrition Programs* (April 17, 2019)
 - *USDA Memo SP 24-2019, Crediting Surimi Seafood in the Child Nutrition Programs* (April 17, 2019)
 - *USDA Memo SP 23-2019, Crediting Popcorn in the Child Nutrition Programs* (April 17, 2019)
 - *USDA Memo SP 22-2019, Crediting Coconut, Hominy, Corn Masa, and Corn*

- Flour in the Child Nutrition Programs* (April 17, 2019)
- *USDA Memo SP 21-2019, Crediting Shelf Shelf-Stable, Dried and Semi-Dried Meat, Poultry, and Products in the Child Nutrition Programs* (April 17, 2019)
- January 22, 2018 Updated *Section 11, Pre-Kindergarten (Pre-K) Meal Pattern for School Nutrition Program (SNP) Operators* to incorporate the following United States Department of Agriculture (USDA) memos:
- *USDA Memo SP 01-2018, Updated Infant and Preschool Meal Patterns in the National School Lunch Program and School Breakfast Program; Questions and Answers* (October 19, 2017)
 - *USDA Memo CACFP 01-2018, Grain Requirement in the Child and Adult Care Food Program; Questions and Answers* (October 19, 2017)
 - *USDA Memo SP 37-2017, Flexibility for Co-Mingled Preschool Meals: Questions and Answers* (June 30, 2017)
- Provided clarification or information on the following issues
- Grains, grain-based dessert
 - Juice
 - Meal pattern flexibility for comingled age/grade groups
 - Meal service options for pre-K students
 - Milk
 - Offer versus serve (OVS)
 - Water
- June 28, 2016 Updated *Administrator's Reference Manual (ARM), Section 11, Infant Feeding* so that it now provides general pre-kindergarten (pre-K) meal pattern guidance for School Nutrition Programs (SNPs) that operate the Child and Adult Care Food Program (CACFP) or serve meals to pre-kindergarten students. The new title of the section will be *Pre-Kindergarten (Pre-K) Meal Pattern for School Nutrition Program (SNP) Operators*.
- Revisions were made to incorporate general guidance from the following United States Department of Agriculture (USDA) memos and guidance:
- *USDA Memo SP 30-2017, Transition Period for the Updated Child and Adult Care Food Program Meal Patterns and the Updated National School Lunch Programs and School Breakfast Program Infant and Preschool Meal Patterns* (May 10, 2017)
 - *USDA Memo CACFP 09-2017, Vegetable and Fruity Requirements in the Child and Adult Care Food Program; Questions and Answers* (March 23, 2017)
 - *USDA Memo CACFP 02-2017, Grain Requirements in the Child and Adult Care Food Program; Questions and Answers* (October 14, 2016)
 - *USDA Memo CACFP 25-2016, Vegetable and Fruit Requirements in the Child and Adult Care Food Program; Questions and Answers* (September 9, 2016)
 - *USDA Memo SP 42-2016, Early Implementation of the Updated Child and Adult Care Food Program Meal Pattern Requirements and the National School Lunch Programs' Infant and Preschool Meal Patterns* (June 24, 2016)
 - *Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010, Final Rule* (April 25, 2016)

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**Contact Information for the
Texas Department of Agriculture (TDA), Food and Nutrition**

When contacting TDA by phone, Contracting Entities (CEs) need to have their CE Identification Number (CE ID) (and site ID, if applicable). CEs should include their name and CE ID (and the site name and ID if applicable) in all communication or documentation.

General Contact Information	
Physical Address	Mailing Address
1700 N. Congress, 11th Floor, Austin, TX 78701	PO Box 12847, Austin, TX 78711-2847
Phone 877-TEX-MEAL, (877) 839 -6325	Email Contact SquareMeals@TexasAgriculture.gov
Fax (888) 203-6593	Website www.SquareMeals.org
Questions about Program Applications	Questions about Program Operation
Child & Adult Care Food Program CACFP.BOps@TexasAgriculture.gov	USDA Foods Operations CommodityOperations@TexasAgriculture.gov
National School Lunch Program, School Breakfast Program, & Special Milk Program NSLP-SBP.BOps@TexasAgriculture.gov	Community Operations (Child & Adult Care Food Program & Summer Food Service Program) Community.Ops@TexasAgriculture.gov
Seamless Summer Option SSO.BOps@TexasAgriculture.gov	School Operations (National School Lunch Program, School Breakfast Program, & Special Milk Program) School.Operations@TexasAgriculture.gov
Summer Food Service Program SFSP.BOps@TexasAgriculture.gov	Texas Eligibility List Management System (Texas ELMS) DirectCertification@TexasAgriculture.gov
Questions about Program Flexibility	Farm Fresh Initiative (Local Products)
SNPWaivers@TexasAgriculture.gov for questions about	FarmFresh@TexasAgriculture.gov
<ul style="list-style-type: none"> - Breakfast Waiver - Child Nutrition Program Requirement Waivers - Gender Exception - Hiring Standards, CEs with Less Than 500 Students - Lunch Mealtime - Paid Lunch Equity (not currently available) - RCCI Age/Grade Group Meal Pattern - Seamless Summer Operation (SSO) Age/Grade - Summer Mandate - Technology-Based Confirmation - Universal Breakfast Mandate - Vending Machine to Dispense Reimbursable Meals 	Questions about Financial Issues
Nutrition@TexasAgriculture.gov for questions about	Capital Expenditures NSLP-SBP.BOps@TexasAgriculture.gov
<ul style="list-style-type: none"> - Milk Substitute Notification 	Claims BCT.BOps@TexasAgriculture.gov
	Procurement, Including Sole Source and Emergency Procurement CE.ProcurementReviews.BOps@TexasAgriculture.gov
	Excessive Balance Plan School.Operations@TexasAgriculture.gov
	Questions about USDA Foods
	USDA Foods Carryover Inventory CommodityOperations@TexasAgriculture.gov
	USDA Foods Transfer CommodityOperations@TexasAgriculture.gov

June 22, 2020

Pre-Kindergarten Meals

Contracting Entities (CEs) that operate the National School Lunch Program (NSLP) and/or the School Breakfast Program (SBP) must use Child and Adult Care Food Program (CACFP) pre-kindergarten (pre-K) meal pattern when serving students 5 years of age and under who are not enrolled in kindergarten.

[NOTE: CEs are required to implement the updated CACFP pre-K meal pattern for SBP and NSLP pre-K students, but other CACFP operational requirements do not apply to NSLP or SBP sites.]

The information in this section provides guidance for the pre-K meal pattern that is specific to CEs operating NSLP or SBP.

- For detailed guidance on the ASCP and CACFP At-Risk meal patterns, see the *Administrator's Reference Manual (ARM), Section 10, Afterschool Snacks & Meals.*
- For more detailed guidance on the pre-K meal pattern, see the *Child and Adult Care Food Program—Child Care Centers Handbook*, available at www.SquareMeals.org.
- For more detailed guidance on the SBP meal pattern, see *Administrator's Reference Manual (ARM), Section 7, Breakfast Meals*, available at www.SquareMeals.org.
- For more detailed guidance on the NSLP meal pattern, see *Administrator's Reference Manual (ARM), Section 8, Lunch Meals*, available at www.SquareMeals.org.

CEs may also find the crediting guidance for specific food products contained in the *Administrator's Reference Manual (ARM), Section 7, Breakfast Meals* and *Section 8, Lunch Meals* helpful.

Definitions for This Section

For this section, the following definitions provide information that may assist CEs in determining eligibility:

Enriched	Product conforms to the Food and Drug Administration’s Standard of Identity for levels of iron, thiamin, riboflavin, and niacin. The terms enriched means nutrients that were lost during food processing have been added back into the product, such as adding back certain vitamins lost in processing wheat to make white flour.
Fortified Grain	Grain that has been processed to add certain vitamins and minerals to the food product to increase nutritional quality.
Juice	Undiluted product obtained by extraction from sound fruit. ¹ 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.
Offer Versus Serve (OVS)	Meal service method that allows students to decline some of the food items/ components offered in a reimbursable lunch or breakfast. [NOTE: A choice of food items within the same food component is not considered to be OVS.] As long as the student takes the minimum servings of the required components for a reimbursable meal under OVS, the meal is reimbursable. The goals of OVS are to reduce food waste and to permit students to choose the foods they want to eat. High schools must implement OVS. Pre-K students cannot be served using the OVS meal pattern.
Plated Meal	Menued meal that includes all required food components in the required minimum serving size.
Sound Fruit	Product made from 100% fruit.
Tofu	Soybean-derived food that is 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.
Whole Grain	Edible part of wheat, corn, rice, oats, rye, barley, etc. Parts of the grains such as the germ or the bran are not considered whole grain. Whole-grain flour or meal is the product derived by grinding the entire grain minus the husk/hull. If a flour or meal does not contain all edible parts of the grain, it is not whole grain.
Whole-Grain Rich	Grain products containing at least 50 percent whole grains. The remaining amount of grains in the product are enriched grains.

Milk Component

Fat Content

- One-year-olds must be served whole milk.²
- Two-year-old children and older must be served low-fat or fat-free unflavored milk.
- All milk must be pasteurized.

Allowable Types of Milk

- Low-fat or fat-free milk
- Low-fat or fat-free lactose reduced milk or low-fat or fat-free lactose-free milk

¹ In this definition, *sound fruit* means a product made from 100% fruit.

² For more information on the transition of infants to whole milk, see *Child and Adult Care Food Program—Child Care Centers Handbook* which is available at www.SquareMeals.org.

- Low-fat or fat-free buttermilk
- Low-fat or fat-free cultured milk
- Low-fat or fat-free acidified milk

Non-Dairy Beverages

- Non-dairy fluid milk substitutes that meet the dietary specifications for a milk substitute may be served to students if the CE provides the same substitute to all students in accordance with CE policy.³
- Other beverages, including water, cannot be offered in place of milk as part of the reimbursable meal or snack.

Fruit and Vegetable Components

Breakfast

- Fruit and vegetables are one component at breakfast.

Lunch, Supper, and Snack

- Fruit and vegetables are two separate components at lunch, supper, and snack.
- Two vegetables may be served in place of a fruit component and a vegetable component for breakfast and lunch. If two vegetable servings are offered at breakfast and lunch, two different vegetables must be served.
- Food items that are mixtures of fruit and vegetables may credit for the fruit component as long as the fruit portion size is creditable ($\frac{1}{8}$ cup or more) and for the vegetable component as long as the vegetable portion size is creditable ($\frac{1}{8}$ cup or more).

Beans and Peas

- If two distinct servings of beans and peas (legumes) are provided, the CE may credit one serving toward the vegetable component and one serving toward the meat/meat alternate component as long as the beans and peas (legumes) are in separate food items and are not the same vegetable. Two servings of the same vegetable at the same meal service cannot be credited as one serving of the vegetable component and one serving of the meat/meat alternate component for pre-K students.

Juice

- Juice must be full strength, 100 percent juice. Mixed fruit and vegetable juice credit as either the fruit or vegetable component (not both) based on the most prominent ingredient.
- Pureed fruits or vegetables in a smoothie may be credited toward the fruit and/or vegetable component as 100 percent juice. The limitation on the number of juice servings per day applies to the juice in a smoothie.

³ If a CE offers a milk substitute, the CE must notify TDA using the *Milk Substitute Worksheet* which is available at www.SquareMeals.org. NSLB/SBP operators must follow the NSLP or SBP requirements as described in *Administrator's Reference Manual (ARM), Section 25, Meal Accommodations*.

- Fruit juice is creditable at one meal per day across all meals at the site based on the programs the CE operates as defined in the *Pre-K Juice Option Scenario Chart*.

Pre-K Juice Option Scenario Chart						
One Juice Serving Across All Meals at the Same Site on the Same Day						
Scenarios	SNP			CACFP At-Risk		Allowable?
	SBP	NSLP	ASCP	Snack	Supper	
Scenario 1	Juice	No Juice	No Juice	Juice	No Juice	Yes
Scenario 2	No Juice	Juice	No Juice	No Juice	Juice	Yes
Scenario 3	No Juice	No Juice	Juice	Juice	No Juice	Yes
Scenario 4	Juice	Juice	No Juice	No Juice	No Juice	No ¹
Scenario 5	No Juice	Juice	Juice	Juice	No Juice	No ²
Scenario 6	Juice	No Juice	No Juice	Juice	Juice	No ³

¹ Juice cannot be offered in two SNP meals services at the same site on the same day.
² Juice cannot be offered in two SNP meal services at the same site on the same day.
³ Juice cannot be offered at two CACFP snacks/meals at the same site on the same day.

SNP Sites Operating Any Combination of SBP, NSLP, and ASCP

CEs may credit juice as the fruit or vegetable component (not both) for pre-K students one time across all meals or snacks served each day at the same site across all SNPs operating at the site.

SNP Half-Day Pre-K Programs Operating SBP Only, NSLP Only, or NSLP and ASCP

CEs may credit juice as the fruit or vegetable component (not both) for pre-K students one time for pre-K students attending a morning half-day session and a second time for the other pre-K students attending an afternoon half-day session. The CE may also treat the combined half-day sessions as a whole day and only serve juice in either the morning session or afternoon session. If the students in the afternoon session also attend ASCP, the juice may credit as the fruit or vegetable component (not both) for pre-K students one time across the lunch and snack services.

For half-day pre-K programs, the juice crediting option the CE uses must be consistent with the requirement to serve a whole-grain rich food item once per day as described in the *Grain Component* subsection of this section.

CACFP Sites Operating At-Risk Snack and At Risk Supper

CEs may credit juice as the fruit or vegetable component (not both) for pre-K students one time across all meals or snacks served each day at the same site across all CACFPs operating at the site.

Minimum Creditable Amount for Fruit and Vegetables

- The minimum creditable amount for fruits and vegetables is 1/8 of a cup.

Grain Component

Serving

- One whole-grain rich food item must be served each day across all meals. The remaining grains served throughout the day must be enriched.

NSLP, SBP, ASCP

When a CE operates one or more SNPs, the CE must offer pre-K students a whole-grain rich food item at least once over all SNP meal services for the day at the site.

- If the CE is offering grains at other meals on the same day, the CE may provide whole-grain rich food items for all meal services.
- If the CE does not provide other whole-grain rich food items at other meal services, all other grains must be enriched grain food items.
- If operating only one SNP and a grain is offered, the grain must be whole-grain rich at the meal/snack service for the day at the location.
- If a grain food item is provided that is not whole-grain rich or enriched, the grain is not creditable toward a reimbursable meal.

Half-Day Pre-K

For half-day pre-K programs, the CE may choose to implement the whole-grain rich requirement as one whole-grain rich food item for each half-day session or may offer one whole-grain rich food item across all meals offered for all half-day sessions on that day in that location.

For half-day pre-K programs, the requirement to serve a whole-grain rich food item once per day must be consistent with the juice crediting option the CE uses as described in the *Juice* subsection in this section.

CACFP At-Risk

When a CE operates a CACFP At-Risk program for pre-K students and offers a grain, the CE must offer a whole-grain rich food item at least once over all CACFP At-Risk meal services for the day at the location.

- If the CE provides snack only and a grain is offered, the grain must be whole-grain rich.
- If the CE provides snack and supper and a grain is offered, a whole-grain rich item must be offered in at least one of the meal services.

Grain-Based Desserts

- Grain-based desserts are not creditable toward the grains component.
- Quick breads,⁴ pancakes, waffles, savory⁵ scones, savory puddings, and savory pies are not considered to be grain-based desserts.
- CEs may serve grain-based desserts as an additional food item that is not part of a reimbursable meal. This option should be used occasionally, not frequently.
- The fruit in a grain-based dessert may credit toward the fruit component, even though the grain portion of a grain-based dessert cannot count toward the grain component.

Breakfast Cereals

- Breakfast cereals must contain no more than 6 grams of sugar⁶ per dry ounce.
- Breakfast cereals must be whole grain, enriched, or fortified.

Substitution

- Meat and meat alternates may be substituted for the entire grain requirement a maximum of three times a week.

Meat/Meat Alternate Component

Serving

- Meat/Meat alternates may be served for the entire grain component no more than three times per week for breakfast.

Meat Alternates

- Tofu may be served.⁷
- Yogurt must contain no more than 23 grams of sugar per 6 ounces.

Information Box 1

Grain-Based Desserts

The following food items are considered to be grain-based desserts:

- Breakfast bars
- Brownies, including black bean brownies
- Cake
- Cereal bars
- Cookies
- Doughnuts
- Granola bars (made in house or commercial)
- Rice pudding
- Sweet bread pudding
- Sweet pie crusts
- Sweet rolls
- Sweet scones
- Toaster pastries

This list is not exhaustive. When there is a question about whether food item may be a grain-based dessert, CEs should consider the ingredients and appearance of the product if the specific grain food item is not listed in *Exhibit A: Grain Requirements for Child Nutrition Programs, Food Buying Guide for Child Nutrition Programs or other USDA guidance*.

⁴ See *Exhibit A of the USDA Memo CACFP 01-2018, Grain Requirements in the Child and Adult Care Food Program, Questions and Answers* for additional information on crediting quick breads. USDA has also updated the *Food Buying Guide for Child Nutrition Programs* to include this information. Available at <http://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>.

⁵ In this reference savory means a food item that is not sweet. Savory food items are typically flavored with herbs and often contain protein ingredients such as cheese.

⁶ This formula is not the same formula used to calculate sugar for Competitive Foods.

⁷ Same specifications as NSLP or SBP, see the *Administrator's Reference Manual (ARM), Section 7, Breakfast Meals or Section 8, Lunch Meals* for additional information on the specifications.

Water Availability

CEs serving meals to pre-K students must continue to follow the NSLP or SBP requirement to have water available during meal service. Moreover, since very young children may lack the ability to request water, CEs are encouraged to offer water to pre-K students at every meal rather than just have it available.

Dietary Specifications

Sugar

- Breakfast cereals can have no more than 6 grams of sugar per dry ounce.⁸
- Yogurt can have no more than 23 grams of sugar per 6 ounces.

Daily Specifications

- All dietary specifications for the pre-K meal pattern are based on daily or individual item limits; therefore, meals served under the pre-K meal pattern are not included in the weekly dietary specifications for NSLP or SBP.
- Pre-K students may be served the same size portions as older students as long as the daily or individual food item specifications are met.

Information Box 2

Calculating the Amount of Sugar in Breakfast Cereal

To determine if there is more than 6 grams of sugar per ounce, use the following formula:

1. Find the serving size in grams and the amount of sugar per serving on the product label.
2. Divide the total sugars by the serving size in grams.

Total Grams Sugar per Serving	÷	Total Grams Serving Size	=	Grams of Sugar per Ounce
9 Grams	÷	55 Grams	=	0.164

If the answer is 0.212 or less, the cereal is within the required sugar limits.

Calculating the Amount of Sugar in Yogurt

To determine if there is more than 6 grams of sugar per ounce, use the following formula:

1. Find the serving size in grams and the amount of sugar per serving on the product label.
2. Divide the total sugars by the serving size in grams.

Total Grams Sugar per Serving	÷	Total Grams Serving Size	=	Grams of Sugar per Ounce
23 Grams	÷	6 Grams	=	3.833

If the answer is 3.833 or less, the yogurt is within the required sugar limits.

Pre-K Meal Service Methods for NSLP or SBP Operators

Offer Versus Serve (OVS) Method for Pre-K Students

- OVS is not allowed for pre-K students.⁹
- A choice of food items within the same food component is not considered to be OVS.

⁸ USDA provides calculation tools and training related to calculating sugar in breakfast cereal and yogurt at <https://www.fns.usda.gov/tn/cacfp-meal-pattern-training-tools>.

⁹ See the *Meal Pattern Flexibility for Comingled Age/Grade Groups* subsection in this section for information on flexibility for meal service options.

Plated Meal Method for Pre-K Students

- The use of *choice* among food items or food components is applied differently for plated meals for pre-K students served under the pre-K meal pattern and K-8 students served under the National School Lunch Program (NSLP) and School Breakfast Program (SBP).
- A plated meal must include all required food components¹⁰ in the required minimum serving size for each required food component.
- The menued meal may include a choice of items within the same component.
For Example:
 - Vegetable Component: green beans or carrots
 - Meat/Meat Alternate Component: chicken or beef
 - Milk Component: low fat or fat-free unflavored milk
- If the student does not take a meal which includes all food components,¹¹ it is not a reimbursable meal.

Family Style Method for Pre-K Students

- Family style service is allowed for all age groups.
- A pre-K student must take at least ¼ cup of a vegetable or fruit for a meal to be reimbursable.
- The supervising adult should initially offer the required minimum serving size of each food component/food item to each pre-K student.

Crediting

Alternate Meal Item

- For NSLP or SBP sites providing pre-K meals, a parent may provide food items for the student to eat onsite as long as it is allowable under local policy. However, the CE must provide all meal components for a reimbursable meal—the parent cannot replace a food component for a reimbursable meal.

Standardized Recipes

- CEs may credit food items with more than one component if the CE uses a standardized recipe, CE-developed, or manufacturer developed.¹²
 - All USDA Foods recipes are standardized; therefore, CEs may use the crediting information provided on the recipe as long as the CE follows the recipe.
 - Child Nutrition (CN) label crediting information is created using standardized recipes; therefore, CEs may use the crediting information as long as the CE follows the preparation and serving directions provided on the CN label.¹³

¹⁰ For lunch, five components; for breakfast, three components.

¹¹ For lunch, five components; for breakfast, three components.

¹² USDA provides guidance on creating standardized recipes in the *Food Buying Guide for Child Nutrition Programs*, available at <http://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>.

¹³ See the *Administrator's Reference Manual (ARM)*, Section 23, *Food Product Documentation* for additional information on this topic.

- A manufacturer may provide a product formation statement with crediting information; therefore, if a product formula statement is provided, the CE may use the crediting information as long as the product is prepared and served as specified.¹⁴
- CEs may also create their own standardized recipes using the information provided in the *Food Buying Guide for Child Nutrition Programs*¹⁵ in the recipe analysis section and credit components based on the calculations described in the standardized recipe development process.

Pre-K Students with Medical Disabilities or Special Dietary Needs

For pre-K students with medical disabilities or special dietary needs, CEs that operate NSLP or SBP must follow the guidance described in the *Administrator's Reference Manual (ARM)*, Section 13, *Meal Accommodations*.

A La Carte Items

CEs may sell a la carte items to pre-K students. However, the sale of a la carte items must not encourage a student to purchase an a la carte item over a reimbursable meal. A la carte sales for pre-K students must meet the competitive food rule.

Performance-Based Reimbursement

When the CE serves pre-K students under the NSLP program, all reimbursable lunches served, including lunches to pre-K students, earn the performance-based reimbursement.

Severe Need Reimbursement

When a CE serves pre-K students under NSLP or SBP, all reimbursable meals served, including meals served to pre-K students, earn severe need reimbursement if the CE/site receives severe need reimbursement.

Meal Pattern Flexibility for Comingled Age/Grade Groups

USDA allows flexibility in the pre-K meal pattern for CEs that are serving meals to pre-K students in the same service area at the same time as older age/grade groups. With this flexibility, CEs may serve the pre-K students the same meal pattern as the kindergarten students at the meal service. The flexibility to use comingled is based on the CE's ability to identify the age/grade groups of the students and the amount of time to serve the meals. However, USDA encourages CEs to evaluate a variety of serving strategies that will allow them to serve the pre-K meal pattern to pre-K students before utilizing this flexibility.

¹⁴ See the *Administrator's Reference Manual (ARM)*, Section 23, *Food Product Documentation* for additional information on this topic.

¹⁵ Available at <http://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>

Before adopting this flexibility, the CE must consider the following:

1. Can the pre-K class or group of pre-K students be reasonably distinguished in the service line?
2. Is there reasonably sufficient time to serve the pre-K students the pre-K meal pattern before older students are served?

The presence of pre-K students in the dining area at the same time as older students does not mean that the meal service is comingled. The CE must still consider the ability to distinguish age/grade groups and if there is reasonable time or opportunity to change the service line. CE's may also find that there is a comingled serving situation at one meal service and not another.

Serving Options That Are Not Considered to Be Comingled

When the pre-K student is easily distinguishable, and there is time and opportunity to serve the appropriate pre-K meal pattern, the pre-K meal pattern must be used.

For Example:

- Pre-K students are served and consume breakfast in the classroom. In this situation, pre-K students are served the pre-K meal pattern.
- Pre-K students pick up a grab-n-go meal in an area of the building dedicated to pre-K students. In this situation, pre-K students are served the pre-K meal pattern.

Serving Options That May Be Considered to Be Comingled

When the pre-K student is not easily distinguishable, and there is not the time or opportunity to change the service line set up for different age/grade groups, the CE may use the meal pattern that is used for kindergarten students at that meal service. For breakfast, the age/grade groups are K-5, K-8, or K-12; for lunch, K-5 or K-8.

For Example:

- Pre-K students pick up a grab-n-go meal in the cafeteria where students of all age/grade groups pick up a grab-n-go meal. In this situation, pre-K students may be served the kindergarten meal pattern.
- Pre-K students go through the cafeteria line and are intermingled with older students or are served in a fashion where pre-K classes alternate with older age/grade group classes. In this situation, pre-K students may be served the kindergarten meal pattern.

Pre-K Meal Pattern for SBP and NSLP

The following charts provide general information on the portion size requirements for each food component for pre-K students for NSLP and SBPs.

Nutrition Standards in the School Breakfast Program (SBP)—Meal Pattern Chart							
Minimum Amount of Each Food Component Per Week (Minimum Offering Per Day)							
Pre-Kindergarten (Pre-K) 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 9-12	Grades K-12
Milk , Unflavored Age 1-2, whole milk Age 3-5, 1 percent low fat or fat free	(1/2) cup	(3/4) cup	Milk , Unflavored 1 percent low fat or unflavored or flavored ¹ fat-free milk	5 (1) cups	5 (1) cups	5 (1) cups	5 (1) cups
Fruits (and Vegetables) ²	(1/4) cup	(1/2) cup	Fruit (and Vegetables) ³	5 (1) cups	5 (1) cups	5 (1) cups	5 (1) cups
Grains , ⁴ Whole Grain-Rich or Enriched			Grains , Whole Grain-Rich	7.0-10 .0 (1.0) oz eq	8.0-10.0 (1.0) oz eq	9.0-10 .0 (1.0) oz eq	9.0-10 .0 (1.0) oz eq
Bread Product (i.e., biscuit, roll, muffin)	(0.5) oz eq		Nutrient Specifications: Daily Amount Based on Average 5-Day Week				
Cooked: Cereal, Cereal Grain, Pasta	(0.5) oz eq		Min-Max Calories (kcal)	350-500	400-550	450-600	450-500
			Saturated Fat % of total calories	< 10	< 10	< 10	< 10
Ready-To-Eat Breakfast Cereal , Dry or Cold: ⁵ Flakes or Rounds Puffed Cereal Granola	(0.5) oz eq (0.7) oz eq (0.2) oz eq		Sodium Target (mg)	T2 ≤ 485 mg	T2 ≤ 535 mg	T2 ≤ 570 mg	T2 ≤ 485 mg
			Trans Fat	Product nutrition label/manufacturer specification must indicate 0 grams of <u>trans</u> fat per serving.			

¹ For K-12, one choice of milk must be unflavored at each meal service.

² 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.

³ Through June 30, 2022, CEs may substitute any vegetable from any subgroup in place of a fruit.

⁴ For pre-K, at least one serving per day, across all meals served must be whole grain-rich unless a meat/meat alternate is being served in place of grain that day. Remaining servings for the day must be enriched. Meat/Meat alternates may be substituted for the entire grain requirement a maximum of three times a week. See the *Meat/Meat Alternates* subsection in this section for more information on this topic. 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.

⁵ For pre-K, breakfast cereals must be 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).

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 1-2, whole milk Age 3-5, 1 percent low fat or fat free	(1/2) cup	(3/4) cup	Milk , Unflavored 1 percent low fat or unflavored or flavored ¹ fat-free milk	5 (1) cups	5 (1) cups	5 (1) cups	5 (1) cups
Fruits ²	(1/8) cup	(1/4) cup	Fruits	2 1/2 (1/2) cups	2 1/2 (1/2) cups	2 1/2 (1/2) cups	5 (1) cups
Vegetables	(1/8) cup	(1/4) cup	Vegetables	3 3/4 (3/4) cups	3 3/4 (3/4) cups	3 3/4 (3/4) cups	5 (1) cups
			Dark Green	1/2 cup	1/2 cup	1/2 cup	1/2 cup
			Red/Orange	3/4 cup	3/4 cup	3/4 cup	1 1/4 cups
			Beans/Peas (Legumes)	1/2 cup	1/2	1/2	1/2
			Starchy	1/2 cup	1/2 cup	1/2 cup	1/2 cup
			Other	1/2 cup	1/2 cup	1/2 cup	3/4 cup
Additional Vegetable	1 cup	1 cup	1 cup	1 cup	1 1/2 cups		
Grains , ³ Whole Grain-Rich or Enriched			Grains , Whole-Grain Rich	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, ⁴ and/or pasta	(0.5) oz eq						
Meat/Meat Alternates ⁵			Meat/Meat Alternates	8-10 (1) oz eq	9-10 (1) oz eq	9-10 (1) oz eq	10-12(2)oz eq
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 % of total calories	< 10	< 10	< 10	< 10
Large egg	(1.0) oz eq	(1.5) oz eq	Sodium Target (mg)	T2 ≤ 935 mg	T2 ≤ 1035mg	T2 ≤ 935 mg	T2 ≤ 1080mg
Cooked dry beans or peas	(0.5) oz eq	(0.75) oz	Trans Fat	Product nutrition label/manufacturer specification must indicate 0 grams of <u>trans</u> fat per serving.			
Peanut butter, soy nut butter, or other nut or seed butter	(1.1) oz eq	(1.7) oz eq					
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					

¹ For K-12, one choice of milk must be unflavored at each meal service.

² 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. 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.

³ 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.

⁴ For pre-K, breakfast cereals must be 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).

⁵ 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) ¹⁶							
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 Flakes/Rounds	--	1/2 cup	--	0.5 oz	0.5 oz eq	8
	Breakfast Cereal Puffed	--	3/4 cup	--	1.0 oz	1.0 oz eq	4
	(Dry /Cold) 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	--	

TDA Forms

TDA provides the following forms on the *SquareMeals* website¹⁷ to assist CEs in implementing the guidance presented in this section:

- *Daily Food Production Record for Central Kitchen, Receiving Kitchen, and Onsite Kitchen*
- *Fluid Milk Substitute Worksheet*

¹⁶ 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.

¹⁷ Available at www.SquareMeals.org.

USDA Resources

USDA provides a large number of tools that can help CEs in operating NSLP and SBP, including the following:

- *Calculating Sugar Limits for Yogurt in the Child and Adult Care Food Program*—Fill in the blank calculation tool.
Available at <https://fns-prod.azureedge.net/sites/default/files/tn/CACFPCalcYogurt.pdf>
- *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>
- *Tools for Schools Webpage*—Website hosting a variety of tools to assist schools in implementing the meal pattern.
Available at <https://www.fns.usda.gov/school-meals/tools-schools>

USDA has released an updated *Food Buying Guide for Child Nutrition Programs (FBG)* that provides information on standardized portion size information. The updated guide is a resource tool for NSLP, SBP, CACFP, and the Summer Food Service Program (SFSP) meal patterns. The *FBG* is available as a single PDF file, a web-based tool and as an app that can be used on phones or tablets. Access to all versions is 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>.

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 3

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.

Food Production Documentation

The CE must keep complete and accurate food production documentation including, but not limited to, food production records, menus, standardized recipes, Child Nutrition (CN) labels, production formulation statements, records indicating food substitutions, invoices or receipts for food products 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.¹⁸

For meals served to pre-K students, CEs may use their existing NSLP or SBP food production record system as long as they retain documentation that demonstrates their compliance with the pre-K meal pattern which includes, but is not limited to, portion sizes, number of servings prepared, number of servings served, and amount of not served. CEs may keep separate records for pre-K students or may combine the records with other age/grade groups. CEs may also use the CACFP food production record form for pre-K meals.

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 keep in mind that this requirement includes all meal services (breakfast, lunch, and snack), including salad and other food bars, quick lines, sack meals, field trips, etc.

CEs should use the following guidance in maintaining production records:

- These records must show how the meals offered and served¹⁹ 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.
- Any meal claimed for reimbursement must be supported by food production documentation.
- When recording the amount of prepared and leftover 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)*²⁰ 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.

¹⁸ See *Administrator's Reference Manual (ARM), Section 20, Counting & Claiming* for additional information on the claims process.

¹⁹ Meals service for pre-K students does not include offer versus serve (OVS), however, a student is allowed to refuse a food item.

²⁰ Available at <https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>

Planned, Offered, and Selected/Served

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

- **Planned.** A planned menu is what the menu planner intends to offer 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 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 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/Served.** Selected or served refers to the foods that were actually served to, or selected by,²¹ students. Menu planners should use selected/served food item data to assist in future menu planning and reduce food waste, so the school does not offer items that students do not select. Food production records should be updated to indicate actual selected/service food items after the meal service so that production records reflect serving trends.

Compliance

TDA will review documentation submitted through TX-UNPS, retained onsite during Administrative Reviews (ARs), or on request to ensure that the CE is in compliance with the regulations described in this section. A review will include an assessment of food production documentation and a review of the meal pattern and may include a nutrient analysis of individual food items served. 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 for food item as appropriate
- Inadequate or unavailable documentation²²

²¹ Meals service for pre-K students does not include offer versus serve (OVS); however, a student is allowed to refuse a food item.

²² See *Administrator's Reference Manual (ARM), Section 23, Food Product Documentation* for additional information on this topic.