

## **New Meal Pattern Q & A's**

### **Grains:**

**Q: For the “whole grain rich” requirements, the USDA says that “whole grain rich” products must meet the minimum portion size requirements for the grain component, but also must meet one other criterion. One of the criteria is that it must have at least 8 grams of whole grain per serving. Does it need to have 8 grams per 1 oz equivalent/grain serving, or per 1 “serving” from the manufacturer?**

**A:** It must have at least 8 grams of whole grain per 1 oz equivalent of Grains. The whole-grain content per oz based on the Exhibit A weights must be at least 8.0 grams for Groups A-G. For Groups H and I, the volumes or weights listed must be offered to credit as one ounce (oz) equivalent (eq). This information may be determined from information provided on the product packaging or by the manufacturer, if available. Pizza crust falls in Group B of Exhibit A, which states that 1 oz eq. = 28 gm. In order for your pizza crust to be whole grain rich, each 28 gm must contain 8 grams of whole grains.

**Q: If a product states the second ingredient on the ingredient label is whole wheat flour, and the first is water, does the product still meet the requirement for a whole grain product?**

**A:** Yes. In accordance with the 2010 Dietary Guidelines, a grain-based product is also considered whole grain-rich if water is listed as the first ingredient on the ingredient label and a whole grain is listed as the second ingredient on the ingredient label. You may also have more than one ingredient that is a whole grain in a recipe; the total weight of all of these whole grain ingredients would be used to determine whether the food item is considered a whole grain.

**Q: When a school prepares a birthday cake once/month to recognize students’ birthdays, does it need to be whole grain rich?**

**A:** During the first two years of implementation at least half the grains offered through the reimbursable meal must be “whole-grain-rich” and after that all grains offered as part of a reimbursable meal must be “whole-grain-rich.” Other grains served as a la carte items do not need to comply with the “whole grain-rich” requirement for the reimbursable school meals.

**Q: What are some specific examples or product names of formulated grain-fruit products?**

**A:** Formulated grain-fruit products are individually wrapped and contain the statement. “This product conforms to USDA Child Nutrition Program specifications. For breakfast, it meets the requirements for fruit/vegetable/juice and one grain/grain alternate.” One example is the “Super Donut.” As USDA memo SP 26-2012 states, these products *may* still be able to credit towards the grain component, but are no longer able to credit towards the fruit component. For lunch, these products may be considered a dessert, and there is a limit of 2 oz equivalents per week of grain-based desserts. Cereal bars, granola bars, breakfast bars, toaster pastries, and energy bars continue to be acceptable.

## **Fruits/Vegetables:**

**Q: If we are offering beans as part of the entrée and counting them as the meat/meat alternate in that entrée, can we still count this toward the weekly legume requirement?**

**A:** Dry/mature beans and peas may be offered as a meat alternate or as a vegetable, at the discretion of the menu planner. However, one serving may not count toward both food components in the same meal. For example, one serving of refried beans can be offered as a vegetable in one meal and as a meat/meat alternate on another occasion. The refried beans offered as a vegetable count toward the weekly beans/peas requirement, but not toward the meat/meat alternate weekly range. Menu planners must determine in advance how to count beans/peas in a meal.

**Q: Can fruits and vegetables of different types be combined at the same meal to make up the minimum requirements at breakfast and/or lunch?**

**A:** Yes, a student may select a  $\frac{1}{2}$  cup that consists of different fruits (e.g., fruit salad), or different vegetables (e.g., mixed vegetables) or a combination of only fruits and vegetables (e.g., carrot/raisin salad).

**Q: For our salad bars, as long as they take a minimum of  $\frac{1}{2}$  cup and are allowed to take the  $\frac{3}{4}$  cup vegetable and  $\frac{1}{2}$  cup fruit, we are okay?**

**A:** Yes, a student must take at least a  $\frac{1}{2}$  cup total of fruits and/or vegetables for a reimbursable meal. Students must be able to select the full amount of the fruit or vegetable component if they choose to do so. The minimum that must be offered is  $\frac{1}{2}$  cup fruit for grades K-8 and 1 cup fruit for 9-12 as well as  $\frac{3}{4}$  cup vegetables for K-8 and 1 cup vegetables for 9-12.

**Q: How do we account for salad bar usage on our production records? Would the serving size be  $\frac{3}{4}$  cup for K-8 and 1 cup for 9-12?**

**A:** You must create a standardized recipe that reflects actual usage and yield. The number of students who you think will use the salad bar each day will be recorded on the production record along with the recipe number. Each student must be offered the minimum amounts of each component, including the fruit and vegetable component.

**Q: For the vegetable subgroups, as long as we offer the required amount on the salad bar, do we have to ensure that they take a full serving or just that it is available to them?**

**A:** Since the salad bar is self-serve, the students may take as much or as little as they want. You must only ensure each student takes at least a total  $\frac{1}{2}$  cup of fruit and/or vegetable for the reimbursable lunch if the student has selected two other components such as grain and meat/meat alternate or milk. If a student selects three components and two are fruit/vegetables, then the student may select  $\frac{1}{2}$  cup of either the fruit or vegetable, but then must select the full component of the other. In regards to the dark green vegetable subgroup, you must ensure that a minimum of  $\frac{1}{2}$  cup total of dark green vegetables is offered weekly. If this salad mix is the only way you are offering dark greens weekly, then you would need to ensure that students were offered a total of 1 cup of spinach greens weekly.

**Q: If a recipe calls for dried and fresh fruit, how would you calculate the serving size? For example, we have a salad with fresh apples and raisins.**

**A:** Add up the total number of cups of fresh fruit that is in the recipe and divide that by the total number of servings, this will give you the cups of fresh fruit per serving. Then add up the total number of cups of dried fruit in the recipe and divide that by the number of servings. Remember, that dried fruit credits as **double** the volume so if 1/8 of a cup is provided it will credit as a 1/4 cup. Once you have determined the creditable amount of dried fruit per serving, add the cups of dried fruit per serving to the cups of fresh fruit per serving, this will tell you how many cups of fruit total are provided per serving.

**Q: If a student takes 2 - 1/2 cups of fruit and 1 - 1/2 cup of vegetable, would that be considered under the minimum requirements, or can we charge for the additional F/V?**

**A:** Students must be given the opportunity to select the maximum serving size for the grade group. For the example above, if the student is in high school, they must be able to select a full cup of fruit and a full cup of vegetables, anything over this could be considered a la carte and the SFA may charge the student for the additional food. It is at the school's discretion to charge for additional servings of meal components. If a school charges for second servings, then they are considered a la carte foods and are not included in the nutrient analysis for the reimbursable school meal. We encourage schools to clearly identify the number of servings that students may take as part of the reimbursable meal.

**Q: When the minimum vegetable requirement is 3/4 cup, can you offer a variety of different vegetables to add up to a total of 3/4 cup?**

**A:** Yes, any combination of vegetables may be offered to add up to the 3/4 cup total, such as 1/4 cup of three different vegetables. The minimum creditable amount of vegetables is 1/8 cup. Each menu is required to meet the weekly minimum vegetable subgroup requirements.

**Q: If a school does not have offer vs. serve for grades K-1, are they required to serve 3/4 cup vegetable on the tray or is 1/2 cup of vegetable sufficient (since this is the serving size that is allowed for a reimbursable meal)?**

**A:** If offer vs. serve is not implemented, the school must serve the minimum required serving size of each component on the tray. This would include 1/2 cup fruit and 3/4 cup vegetable for grades K-5.

**Q: Is an SFA required to designate "additional" vegetables after they have met the subgroup and "other" requirements?**

**A:** SFAs are required to list all vegetables served. Menu planners should ensure that the minimum requirements of all vegetable subgroups and weekly requirements have been met.

**Q: If there is a minimum of 1/8 cup vegetable contribution/serving of pureed vegetables added to sauces, can this count towards the weekly subgroup requirement if the vegetables are part of the menu item’s name or pictures of the vegetables are displayed on the serving line? (An example would be “Butternut Mac & Cheese” where at least 1/8 cup of butternut squash is used in the recipe.)**

**A:** Pureed foods such as fruits or vegetables may contribute to meal pattern requirements, provided that the dish that contains them also provides an adequate amount of recognizable, creditable fruits or vegetables.

For example, if a macaroni and cheese dish contains the minimum recognizable amount of vegetables (e.g., 1/8 cup of diced squash), the volume of unrecognizable vegetables (e.g., 1/8 cup of pureed carrots) may also be credited. In this example, the dish would provide a total of ¼ cup red/orange vegetables. This is the same concept that has historically allowed soy flour (Alternate Protein Product) in a pizza crust to contribute as a meat alternate -- there is a recognizable amount of cheese and/or meat included in pizza as topping.

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

**Minimums/Maximums\*\*:**

**Q: For the grain and meat/meat alternate limits for each grade level, do we need to include all flour used in recipes, i.e., homemade macaroni and cheese sauce? Bread crumbs in a meatloaf recipe?**

**A:** You do not have to count flour in a recipe used as a thickener or bread crumbs in meatloaf. In SY 2012-2013, an SFA has the flexibility to decide whether to count batter/breading greater than or equal to 0.25 oz eq toward the daily and weekly grains requirements. Beginning SY 2013-2014, all grains equal to or greater than 0.25 oz eq must be counted towards the weekly grains range (including battered and/or breaded products).

**Q: How do you count the servings of meat/meat alternate when you have several entrée choices when determining the weekly minimums and maximums?**

**A:** The daily minimums must be added together to determine the weekly minimum and the daily maximums must be added together to determine the weekly maximum. Please see example below.

Monday	Tuesday	Wednesday	Thursday	Friday	Weekly Totals
Burger (2 oz)	Burrito (1.5 oz)	Pizza (1.5 oz)	Tacos (2 oz)	Burger (2 oz)	Min: 9 oz
Chicken (2 oz)	Lasagna (2 oz)	Turkey (2 oz)	Spaghetti (2 oz)	Fish (2 oz)	Max: 10 oz

Weekly Minimums = 2 + 1.5 + 1.5 + 2 + 2 = 9 oz

Weekly Maximums = 2 + 2 + 2 + 2 + 2 = 10 oz

**Q: When restricting maximum on grains and meat/meat alternates what are some suggestions for meeting the calorie minimums?**

**A:** Offer larger portions of fruits and vegetables. When planning menus that contain two or more entrée choices, try to offer the same number of servings of meat/meat alternate and grains. Example: Monday - Entrée A provides 3 oz. M/MA and 2 grains; Entrée B also provides 3 oz. M/MA and 2 grains. Tuesday – Entrée A provides 2.5 oz. M/MA and 2 grains; Entrée B also provides 2.5 oz. M/MA and 2 grains. In other words, whatever the maximum is, make these numbers consistent for all choices each day.

**Q: Can items such as croutons and sunflower seeds be offered on salad bars without counting towards grain and meat/meat alternate maximums?**

**A:** If the planned per-person/serving amount is below the 0.25 oz. minimum to count towards the daily meat/meat alternate or grain, it does not need to be counted towards the meat/meat alternate or grain maximums. To find the per-person serving amount, total the amount used and divide by the recipe yield to determine if the grain or meat/meat alternate must be added to the daily component contribution.

\*\*USDA is allowing flexibility in meeting meat/meat alternate and grain component maximums during SY 2012-2013 and SY 2013-2014. USDA will reevaluate this requirement for SY 2014-2015.

### **Crediting Components:**

**Q: What components of a smoothie can we count at breakfast and/or lunch?**

**A:** Milk and fruit may be credited in smoothies prepared by program operators/district/SFA. Vegetables cannot be credited in a smoothie. Grain and meat/meat alternates (yogurt) cannot be credited when served as a beverage. However, even though these extra ingredients in smoothies don't contribute to meal pattern requirements, the grain and meat/meat alternate components added in smoothies must be counted in the weekly minimum and maximum\*\* range tabulation for schools when offered in amounts greater than or equal to 0.25 oz equivalents. Program operators need to be aware of how these extra ingredients may impact calories and saturated fat. Refer to SP36-2012 dated July 11, 2012 for more information.

**Q: Do we have to count all components, even partial ones? For example, we offer lettuce and tomato for the hot sandwiches and we consider it a condiment.**

**A:** For a fruit or vegetable to contribute, it must be a minimum of 1/8 cup, anything less than that would not be counted towards the fruit or vegetable component requirement. Menu items must contribute at least 0.25 oz eq toward the meat/meat alternate and/or grain components to count as part of the meat/meat alternate or grain contribution.

**Q: Will a slice of pizza be counted as 3 components and fulfill vegetable requirement under the new regulations?**

A: A slice of pizza may count for 3 components only if it contains a minimum of ½ cup fruit or vegetable, the minimum grain serving and the minimum meat/meat alternate serving for the specific age/grade group.

**Q: If 1/8 cup is a creditable serving, why must they be required to take the ½ cup of fruit or vegetable?**

A: The new meal patterns are based on the Dietary Guidelines for Americans and are encouraging children to consume more fruits and vegetables. The minimum portion size of a vegetable that can be counted towards a reimbursable serving is 1/8 cup, but a student would still need to select a full ½ cup or more of fruit(s) and/or vegetable(s) for a reimbursable meal.

**Q: How do you count partial servings of meat/meat alternates and grains? For example, how many meat/meat alternate contributions are credited in a recipe that provides 2.2 oz. meat/meat alternate?**

A: Meat/meat alternates and grains are credited by rounding down to the nearest quarter ounce (0.25 oz). A 2.2 oz serving of meat/meat alternate will credit as 2 oz meat/meat alternate. A 1.8 oz serving of meat/meat alternate will credit as 1.75 oz meat/meat alternate.

**Dietary Specifications:**

**Q: Is Colorado going to keep the stricter sodium limits until the new regulations are implemented?**

A: Yes. The Colorado sodium guideline for breakfast is 600 mg and 1200 mg for lunch (all grade levels).

**Q: Are maximum calorie counts only subject to planned meals served?**

A: Maximum calorie counts are based on the planned meals served. If seconds are served free, the seconds must be counted towards the calorie requirements as well.

**Q: If seconds are offered, do they count towards maximum calorie count?**

A: If second helpings or second meals are sold a la carte, they do not contribute toward the components or dietary specifications for reimbursable meals. However, if a school elects to offer second servings of any part of the reimbursable meal, these foods must be counted toward the daily and weekly component contributions, as well as the weekly dietary specifications.

**Q: Do the new meal pattern nutritional requirements of zero trans-fats apply to a la carte items?**

A: No; the USDA trans fat requirements apply only to food served in reimbursable meals. A la carte items will fall under the Competitive Foods Regulations, which are currently undergoing comments to the proposed rule.

**Q: Do all food labels need to have trans fat listed, even if the item does not contain trans fat?**

A: Yes, an indication of zero trans fats on nutrition labels or manufacturer's specifications is required for all food items served as part of a reimbursable meal.

### **Menu Planning:**

**Q: How do we plan menus for schools that are grades 6-12, since there is no calorie overlap?**

A: The overlap for grains and meat/meat alternate for grades 9-12 is 10 oz eq. All students would receive 2 oz meat/meat alternate per day and 2 oz eq. of grains per day. The number of planned servings for 6-8 and 9-12 students must be separated on the daily production record so a separate nutrient analysis can be done for each grade group. USDA suggests increasing portions of the fruit and vegetable for the older students, if possible. A fruit and vegetable bar would be helpful.

**Q: How should an SFA plan menus for a middle school that serves grades 5-8?**

A: When serving grades 5-8, SFAs must use the overlap of menu requirements for grades K-5 and grades 6-8 (K-8). The menu requirements for an overlap in a 5-8 grade group for a five-day school week are 9-10 oz meat/meat alternate, and 8-9 oz grains. For a four-day school week, the menu requirements are 7-8 oz meat/meat alternates, and 6.5-7 oz grains. Please keep in mind that SFAs have flexibility with the meat/meat alternate and grain maximums for SY 2012-2013 and SY 2013-2014.

### **Certification:**

**Q: Will all schools have the opportunity to receive the additional .06 cents?**

A: Yes, all schools that participate in the National School Lunch Program will be eligible for the additional 6 cents. However, all schools within the SFA must be in compliance with the meal pattern requirements for the SFA to be certified for the 6 cents per lunch reimbursement. If the SFA participates in the SBP, the schools must also be in compliance with the updated breakfast requirements in effect at the time of certification.

**Q: Does each SFA need to complete a nutrient analysis for Certification?**

A: Each SFA is required to submit either a nutrient analysis, using FNS approved software, or the simplified nutrient assessment provided on the Certification tool worksheets.

### **Miscellaneous:**

**Q: Do the new meal requirements apply to meals served to Pre-K children in schools?**

A: No; the meal pattern for Pre-K students will be updated through a future rule updating the CACFP meal patterns to ensure that the meal requirements for preschoolers are the same across the Child Nutrition Programs. Until then, schools serving Pre-K children should continue to use existing meal patterns for this age group. USDA encourages schools to adopt aspects of the new meal pattern, such as increasing whole grains and increased variety in vegetable offerings, to promote optimal nutrition for Pre-K children.

**Q: Do the Pre-K requirements apply to Head Start as well?**

A: Yes, Pre-K requirements apply to Head Start.

**Q: If an SFA offers several entrée choices on one serving line, do they have to have a separate complete meal display for each option?**

A: SFAs need to identify what makes up a reimbursable meal. An example could be, “entrée choice” plus fruit, vegetable, and milk to simplify meal identification when there are multiple choices. A menu board may be a good way to illustrate what menu items are a part of a reimbursable meal. Meal identification of a reimbursable meal is required whether or not a la carte choices are available on the same line.

**Q: How should an SFA plan meals for special needs students who do not meet the age requirement, (i.e., they are in 4<sup>th</sup> grade, but should be in 6<sup>th</sup> grade)?**

A: Schools are allowed, on a case-by-case basis, to offer age-appropriate meals to individual students in unique situations. Any program/school requesting modifications to the meal pattern for any/all students must seek approval from the CDE OSN.

**Q: On field trip days when several students are missing and a subgroup is offered on that day only, is the SFA required to offer that vegetable subgroup at another time during the week?**

A: If you have advance notice of the field trip, it would be a best practice to offer the subgroup on another day. However, if you do not have advance notice, you do not need to offer it again.

**Q: Does a variety of milk need to be offered to students when serving breakfast in the classroom?**

A: Yes, a variety of at least two of the following milk varieties must be offered with breakfast: nonfat unflavored, nonfat flavored, or 1% unflavored. It may be helpful to pack the milk separately in a cooler to allow students to select a milk choice.

**Q: What resources does the CDE OSN have available for SFAs to communicate with teachers, administrators, board members, etc.?**

A: The CDE OSN has developed brochures that are geared towards administrators, teachers, and parents. These brochures explain the new meal pattern standards and suggest ways to support the new



requirements. They can be found at:

<http://www.cde.state.co.us/cdenutritran/nutritrainingsNewMealPatterns.htm>

The CDE OSN will continue to assess SFAs need of these types of resources and develop new tools as needed.

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