

Questions and Answers

School Nutrition Team Child Nutrition Reauthorization Conferences – June 2012

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MEAL PATTERN REQUIREMENTS

General:

- 1. Are the minimums and maximums adjusted for school food authorities that regularly operate on a long or short week (i.e. Residential Child Care Institutions that always operates on a 7-day week basis)?**

Yes. Adjustments have been made to the meal pattern for School Food Authorities (SFAs) that regularly operate on a long or short week. These adjustments are posted on DPI School Nutrition website at: http://fns.dpi.wi.gov/files/fns/pdf/gm_nslp_sp_10_2012_r42712a.pdf. There are also specific workbooks for school agencies with long and short weeks posted on DPI's menu certification website at: http://fns.dpi.wi.gov/fns_6centscert. Please note that SFAs that regularly operate on a 5-day school week, but have a short week due to a holiday, must make a "good-faith" effort to meet the meal pattern requirements.

- 2. Can premade chef salads be served as a meal?**

Yes. A standardized recipe or manufacturer's statement for the premade salad is needed to support how the pre-packaged salad contributes to the meal pattern requirements for lunch. The other lunch components that are not provided in the pre-made chef salad (i.e., fluid milk and grains) must be available for selection by students.

- 3. Can you offer sugar packets for fruit like grapefruit? Can salt packets be available as a condiment with the vegetables?**

Yes, sugar and salt may be offered as condiments. Condiments usage is entered for the nutrition assessment. Added sugar will increase calories and added salt will increase the sodium levels. With the stringency of the dietary specifications, added sugar and salt are discouraged. Refer to the Fact Sheets for Healthier School Meals posted at: http://teanutrition.usda.gov/Resources/dgfactsheet_hsm.html.

- 4. If we put less cheese in our grilled cheese sandwich, do we have to change our current recipes? Do we have to write down how much cheese we put into K-5, 6-8, 9-12 sandwich?**

Yes, recipes used for all menu items served as part of the reimbursable meal must reflect actual ingredients, the amounts used, portion sizes/yields, any variations for grade groups and preparation steps. When updating recipes evaluate the contribution a serving makes towards meeting the meal pattern requirements for the grade groups and note the contribution on the recipe as a reference.

- 5. What do you do in a high school with students who take two or more meals?**

The meals planned for National School Lunch Program are designed to meet the nutrient needs for students within the established grade groups. Only one lunch per day is reimbursable. School Food Authorities (SFAs) decide if additional meals are available for sale to students and establish appropriate prices to cover costs incurred for these sales.

- 6. I don't want to wait another year to start the new meal pattern for breakfast. Can't I be proactive and use the new breakfast meal pattern?**

School Food Authorities (SFAs) must receive state agency approval to adopt the breakfast requirements prior to the 2013-14 school year. To request for approval contact Jessica Sharkus, Assistant Director at 608-266-2416, or jessica.sharkus@dpi.wi.gov. Reference: Question #13 on

page 3 of USDA Questions and Answers on the Final Rule entitled “Nutrition Standards in the National School Lunch and School Breakfast Programs”, Third Revision, July 13, 2012 posted at: http://fns.dpi.wi.gov/fns_cnrsnp#ns.

7. Do the new meal pattern requirements reflect meals we are serving this summer?

No. Meals served under the Summer Food Service Program or Seamless Summer Option do not have to meet the new meal pattern requirements for the summer of 2012.

8. Can we serve peanut butter and jelly sandwiches as an option for students who don’t like the main entrée?

Yes, menu options are permitted when planning reimbursable meals. The menu planner must develop a recipe or obtain product information and stay within the prescribed minimums and maximums established for the meat/meat alternate and grains components for each grade group. A sandwich that contains two tablespoons of peanut butter provides one ounce of creditable meat/meat alternate. Grains contribution is based on the weight of the bread slice and how many slices used for a sandwich. Portion control must be used if the sandwiches are not pre-made. The menu planner must also determine if the sandwich served as a lunch option will meet dietary specifications established for calories, saturated fat, and sodium when all lunch offerings are averaged over a week.

9. Can we use the 2.5 oz. PB & J sandwich to fulfill the lunch meal pattern requirements next year for students in grades K-5 and 6-8?

Yes, if you are referring to the Smuckers Peanut Butter & Jelly Sandwich with Soy on whole grain bread (C453) that is offered as a USDA Food. It has a product formulation statement to specify that this product provides 1 ounce meat/meat alternate and 1.25 grains/breads servings. “Unbleached whole wheat flour” is the first ingredient on the product list for the bread in the sandwich so it is whole grain-rich. The crediting for the bread will be revised based on the new grains criteria. There is a one year grace period so the previous grains/breads instruction, including the old Exhibit A, may continue to be used to credit grains for the 2012-13 school year. There is no grace period for the dietary specifications for calories, sodium, trans fat and saturated fat, or the daily minimum and weekly maximum requirements for the grains and meat/meat alternate components for lunch. Consideration must be given to the dietary specifications when choosing to use this item as a lunch component.

10. Do additional a la carte entrée choices offered to students in all grades 6-8 and 9-12 buildings need to be eliminated?

No, the new meal pattern requirements and dietary specifications apply to meals that are claimed for federal reimbursement and have no bearing on what is sold a la carte. School Food Authorities (SFAs) participating in the school lunch and/or school breakfast program are encouraged to send consistent messages to students by offering only healthy choices (low in calories, saturated fat and sodium) or healthy alternatives.

Fruits & Vegetable Components:

1. What is the minimum portion size for lunch that you can use when planning fruits and vegetables to be counted as a meal component towards a reimbursable meal?

A ½ cup remains the minimum portion that can be counted towards meeting the daily requirements. Total daily fruit minimum requirements are ½ cup for grades K-5 and grades 6-8

and 1 cup for grades 9-12. Total daily vegetable minimum requirements are $\frac{3}{4}$ cup for grades K-5 and grades 6-8 and 1 cup for grades 9-12.

2. Do we have to offer vegetables and fruits in 1/2 cup servings when planning reimbursable lunches?

No. Portion sizes of less than $\frac{1}{2}$ cup may be offered based on how the menu planner intends to meet the total daily minimums for the grade groupings. Portions as little as $\frac{1}{8}$ cup can be served, but students must select at least a $\frac{1}{2}$ cup of any combination of fruits or vegetables for a lunch to be reimbursable under Offer versus Serve. See the Offer versus Serve section of this Q&A for further details about when the $\frac{1}{2}$ cup serving is permitted.

3. Must 1 cup spoodles be used for vegetables and fruits served to students in grades 9-12?

No. To meet requirements students in grades 9-12 must be offered a minimum of 1 cup of fruit and a minimum of 1 cup of vegetables per day. Any planned serving of $\frac{1}{8}$ cup or more can count towards the requirements. There must be clear signage posted so students can select what is planned. Under Offer versus Serve, students are allowed to take smaller portions of the fruit OR vegetables. Signage must be posted to let them know that they may take 2 scoops when a $\frac{1}{2}$ cup serving utensil is set out on the self serve line.

4. Students serve themselves fruits and vegetables at our school, is that okay?

Yes. Self-service is allowed. It is up to the menu planner to specify the daily portion sizes of the fruits and vegetables to meet the meal pattern requirements for the grade groupings. Attention must also be given to meeting the requirements for the vegetable subgroups. The planned portion sizes must be conveyed to students for operations with self service. Some examples include appropriate signage (“take 5 baby carrots”, “take 1 apple”, etc.), pictures, and/ or designated serving utensils. Refer to question and answers in the menu identification section of this Q&A for further information.

5. Students serve themselves at my school. Can we use a 3 oz. (3/8 cup) ladle for a 4 oz. (1/2 cup) planned serving size, because students don’t level the scoop?

No. The serving utensils set out on the serving line should be consistent with planned portion sizes. Consider teaching students how to properly use portion control utensils for self service items.

6. When you say “no more than half of fruits and vegetable offerings may be in the form of juice”, does that mean for breakfast and lunch combined or each meal separately?

The provision that limits 100% full-strength juice to no more than one-half of the weekly offerings for the fruit component or the vegetable component applies separately to lunch and to breakfast. The new meal pattern for the School Breakfast Program is effective at the start of the 2013-2014 school year. At that time it will include the requirement that limits 100% juice to no more than half of fruit offerings for the week. Most schools will still be operating this program under traditional menu planning system, enhanced menu planning system, or Nutrient Standard Menu Planning (NSMP) for the 2012-2013 school year. There are no limitations for juice under these menu planning systems.

7. In order for a lunch to be a “second lunch”, do students have to take fruit or vegetable on their tray?

Each student is allowed ONLY one reimbursable lunch per day, so there are no fruit and/or vegetable requirements for the second lunch because it cannot be claimed for reimbursement.

8. How can schools serve fruits and vegetables without any limitations when there are calorie maximums?

The regulations state that there are no maximums on fruits and vegetables, but there are dietary specifications for calories, saturated fat and sodium maximums to consider. Most fruits and vegetables are low in calories with the exception of the processed starchy vegetables. Review the nutrition facts to determine how these products fit within these weekly dietary specifications. Sauces, dips, seasonings and condiments added to fruits and vegetables and/or available for self service must be taken into account, too.

9. Can school menus include different forms of the same fruit (apples and apple sauce or oranges and mandarin oranges) or vegetable on the same day?

Yes. Under the new meal pattern the menus may be planned and students may take different forms of the same fruit or vegetable. For example, a student in grade K-5 may select ¼ cup of apples and ¼ cup of applesauce to receive the daily minimum ½ cup requirements for the fruit component. There is no requirement to offer a variety of fruit, but it is certainly encouraged.

10. Do all fruit/vegetable choices have to be the SAME for all students?

No. The fruits and vegetables may be varied among grade groups and serving lines as long as all students have access to fruits and vegetables planned to meet meal pattern requirements. Necessary accommodations must be made to ensure that all students have the opportunity to select vegetables from the planned vegetable subgroups. Detailed production records must be kept to document how the menu planner intends to meet meal pattern requirements.

Fruit Component:

1. Is it correct that schools may serve gelatin but not fruit snacks?

Yes. Effective July 1, 2012 (school year 2012-13), snack type fruit products may not be credited towards meeting meal pattern requirements AND these products cannot be served with reimbursable meals. Only whole dried fruit, whole dried fruit piece, fresh, frozen or canned fruits; or 100% full-strength juice may contribute toward the fruits component. *Reference: Questions #12 on page 6 of USDA Questions and Answers on the Final Rule entitled “Nutrition Standards in the National School Lunch and School Breakfast Programs”, Third Revision, July 13, 2012 posted at: http://fns.dpi.wi.gov/fns_cnrsnp#ns.*

2. Can 100 percent fruit strips, fruit drops, or other fruit snacks be offered but NOT counted as a fruit?

No. See question #1 in these section of the Q&A.

3. Can gelatin dessert be made with 100% juice instead of water to be counted as a fruit component?

No. Only 100% full-strength juice is creditable and juice cannot be diluted with other ingredients. Likewise, sherbet with 100% juice cannot be credited towards the fruit component.

4. Where can we buy 2 oz. raisins?

Contact distributors and other schools to find products in the specific pre-portioned size to meet the crediting requirements for dried fruit. A ¼ cup serving of dried fruit is equal to ½ cup fruit under the new meal pattern requirements. Remember 2 ounce (1/4 cup) by measure is NOT 2 ounce by weight.

Vegetable Component:

1. How do you measure uncooked leafy greens?

Uncooked leafy greens are measured by volume and NOT by weight. The requirement is to plan and offer vegetables in volume measurements (i.e. ⅛ cup, ¼ cup, ½ cup, 1 cup). Uncooked leafy greens credit ½ of the amount they are served, so 1 cup uncooked leafy greens credit as ½ cup vegetable. The uncooked leafy greens may be pre-portioned in individual serving containers for selection by students on the serving line. Another option is to provide visual aid to show students what the appropriate serving size looks like. Position a trained person at the point of service to monitor what students select and provide assistance so the proper portions of menu items are taken.

2. Is it acceptable to only offer ¼ cup romaine lettuce and ¼ cup carrots on one day's lunch menu?

No. It appears that only ⅜ cup of creditable vegetable has been offered. The ¼ cup of romaine lettuce credits as ⅛ cup vegetable. Uncooked leafy greens credit as ½ of the total volume. Other vegetables must be offered to meet the total ¾ cup daily minimum requirements for grades K-5 and grades 6-8 and the 1 cup daily minimum requirement for grades 9-12.

3. Can ketchup, pickles, and onions count as a vegetable or only as garnishes or condiments?

Ketchup is always considered a condiment, but pickles and onions can be counted as vegetables. Both of these items are listed in the vegetable subsection of the 2012 update to the USDA *Food Buying Guide for Child Nutrition Programs – (NSLP and SMP only)*. The planned portion size must be at least 1/8 cup (the minimum creditable amount). If less than ⅛ cup of pickles or onions are planned as the portion size, then the items are considered to be garnishes. The dietary specification for sodium is an important consideration when planning pickles as a creditable vegetable serving and/or as a garnish.

4. Can we serve popcorn as a vegetable?

No, popcorn is not a creditable vegetable nor is it creditable as a grains component for any USDA Child Nutrition Program (Lunch, Breakfast, and After School Snack).

5. Can hummus count as a vegetable? I am considering serving yogurt as the meat/meat alternate, and hummus as a vegetable.

Yes. Hummus may count as a vegetable because garbanzo beans (or chickpeas) is the customary ingredient. The minimum amount of garbanzo beans per serving must be at least ⅛ cup so check the recipe or the manufacturer information for crediting purposes. For example, serving ¼ cup of hummus does not credit as ¼ of vegetables because there are additional ingredients. Garbanzo beans are categorized as beans and peas (legumes) so count the serving toward meeting the vegetable subgroup requirement if there is a least an ⅛ cup of these beans in a planned serving.

6. I'm confused about the vegetables, is it ½ cup or ¾ cup per day for students in grades K-5 and 6-8? Why?

Students in all grade groupings must select at least a ½ cup of ANY combination of fruits or vegetables for a lunch to be reimbursable under Offer versus Serve. Students must be offered the opportunity to take the minimum daily requirements for the vegetable component (¾ cup for grades K-5 and for grades 6-8) in addition to the minimum daily requirement of the fruit component (1/2 cup for grades K-5 and for grades 6-8). When Offer versus Serve is NOT available for grades K-5 and grades 6-8, the daily vegetable and daily fruit minimum requirements must be selected to claim the lunches for reimbursement. Changes were made to the meal pattern requirements to align school meals with the 2012 Dietary Guidelines for Americans. Allowing students to take smaller portions of the fruits and vegetables under Offer versus Serve address public comments regarding cost and food waste. Further information is provided in the Offer versus Serve section of this Q&A.

Vegetable Subgroups:

1. In a week when there are less than 5 days - how do we menu items that are required, i.e.-legumes, greens, etc.? Can one of the requirements be eliminated and if so, which one?

For schools with occasional decreases in the school week length due to holidays, etc., the menus do not have to be adjusted, but menu planners must plan their menus in a way that is consistent with the intent of the meal patterns. Planners should make sure they do not consistently fail to offer certain vegetable subgroups. Reference: Question #2 on page 21 of USDA's SP 10-2012: Third Revision (July 13, 201) Questions & Answers on the Final Rule, "Nutrition Standards in the National School Lunch and School Breakfast Programs" is posted at:

http://fns.dpi.wi.gov/fns_cnrsnp#ns.

2. Do all vegetables in the dark green subgroup have to be served in 1 cup quantities to equal ½ cup vegetables?

No. The minimums established for ALL vegetable subgroup requirements on the lunch meal pattern chart are for the week. Menu planners have discretion when planning the servings throughout the week but the minimum serving size is at least ⅛ cup. Crediting rules for all uncooked leafy greens (iceberg lettuce, spinach, romaine.) require volume conversion. Only half the amount is creditable so ¼ cup of uncooked leafy greens equals the ⅛ cup portion sizes and 1 cup is equal to ½ cup. Specified uncooked leafy greens such as romaine or spinach are categorized as dark green vegetables. There are no conversions for broccoli which is also in the dark green vegetable subgroup.

3. How do we handle the vegetable sub-group requirements when there are multiple lunch lines? For example, must 1-1/4 cups of vegetables in the red/orange subgroup be planned for each line in a high school with rotating bar line and a traditional serving line OR can the minimum 1-1/4 cups from this subgroup be offered between the two lines over the week?

Section 210.10(k) (2) on page 4147 of the Federal Register states: "Schools that offer a variety of lunches or multiple serving lines must make all required food components available to all students on every lunch line in at least the minimum required amounts." Think of each serving line as its own entity and the daily and weekly requirements must be met for each line. The vegetables

offered within the subgroup may be different. For instant, a heated vegetable (broccoli) in the dark green subgroup may be served on one line and another line may include an uncooked vegetable in the dark green subgroup (romaine lettuce). However, if students are able to cross from line to line, the different vegetable subgroups don't necessarily have to be offered on each line. For further information refer to question #3 on pages 25-26 of *USDA's SP 10-2012: Third Revision (July 12, 2012) Questions & Answers on the Final Rule entitled "Nutrition Standards in the National School Lunch and School Breakfast Programs"*, posted at: http://fns.dpi.wi.gov/fns_cnrsnp#ns.

4. When serving heated green beans on the main line, must this vegetable also be offered on the other 3 lines or can another vegetable from the "other" subgroup, such as raw green peppers be offered?

It's up to the menu planner to decide how to meet the vegetable subgroup requirements throughout the week. The lunch must be planned to include a minimum of ½ cup of vegetables from the "other" vegetable subgroup for students in grade K-5 and in grade 6-8, and ¾ cup for students in grades 9-12 throughout the week. The subgroup does not have to be the same on each line, as long as all students have access to planned vegetables in "other" vegetable subgroup on that day.

5. Do the amounts of romaine lettuce and carrots count towards the weekly subgroup requirements for a minimum of ½ cup dark greens and minimum ¾ cup of red/orange vegetable subgroups per week?

Yes. The planned portion sizes of romaine lettuce and carrots credit towards the daily minimums and the weekly subgroup minimum requirements. Remember that ½ cup of uncooked leafy greens (romaine, spinach, etc.) count only as ¼ cup creditable vegetable.

6. Does tomato sauce count as a red/orange vegetable?

Yes. Tomato sauce counts as red/orange vegetable when the planned serving is at least a 1/8 cup. Processed items that contain vegetables will have new Child Nutrition (CN) labels to specify how the products credit towards meeting the daily minimums AND the weekly vegetable subgroups requirements.

7. Would tomato juice count as serving of vegetables in the new meal pattern?

Yes, if the tomato juice is 100% full-strength juice. As a reminder, no more than ½ of the fruit or vegetable offerings per week may be in the form of juice.

8. Why is spinach carrot 100% full-strength vegetable juice blend counted as an "other" vegetable?

According to USDA regulations, 100% full-strength vegetable juice blends containing vegetables from MORE THAN ONE SUBGROUP may contribute to the "other" vegetable subgroup or as additional vegetables. Full-strength juice blend combinations must be from the same vegetable subgroup to count toward the single subgroup. An example is full strength carrot tomato juice blend which counts as red/orange vegetables.

9. If you serve 100% full-strength spinach carrot vegetable juice blend, why is it not considered dark green if spinach is the first (and greater quantity) in the ingredients?

As stated in question 8 in this section of the Q&A, the spinach carrot vegetable juice blend would credit as an "other" vegetable subgroup or an additional vegetable because there is more than one

subgroup in the mixture. Crediting 100% full-strength vegetable AND fruit juice blends (e.g., carrot pineapple juice) is based on the first ingredient. The first ingredient determines if the vegetable and fruit juice blend is a creditable fruit or a creditable vegetable. When the vegetable is the first ingredient the blend is ALWAYS counted in the “other” vegetable subgroup or as additional vegetables. The carrot pineapple juice CANNOT be counted towards meeting the weekly requirements for the red/orange vegetable subgroup.

10. Does the website that was mentioned during the training categorizing unusual vegetables attribute to the new vegetable subgroups?

Yes. The websites mentioned during the fruit and vegetable training sessions are: <http://www.cnpp.usda.gov/Publications/USDAFoodPatterns/ItemClustersAndRepFoods.pdf>, and http://fns.dpi.wi.gov/files/fns/pdf/vege_subgrp.pdf. However, the recently revised Vegetables and Fruits Section of the *Food Buying Guide for Child Nutrition Programs – NLSP and SBP Only* is schools’ primary resource. The separate vegetable subsection specifies the vegetable subgroup category (red/orange, dark green, beans & peas, starchy, other) for each item listed. It can be accessed online at: <http://www.teamnutrition.usda.gov/resources/foodbuyingguide.html>. Vegetables recently classified by the Center for Nutrition Policy and Promotion that are not included in this revised Vegetables and Fruits Section are:

Purple bell peppers classified as “Other” Vegetables

Broccoli rabe (broccoletti), green leaf or red leaf lettuce classified as Dark Green Vegetables

White yams classified as a “Starchy” Vegetable

Note: Yellow yams and sweet potatoes are both considered “Red/Orange vegetables. The vast majority of products in US are sweet potatoes, even if labeled “yams/sweet potatoes”

USDA recommended an additional website in a recent Q&A:

<http://www.choosemyplate.gov/food-groups/vegetables.html>.

Reference: Question #35 on page 10 of USDA’s SP 10-2012: Third Revision (July 13, 2012) *Questions & Answers on the Final Rule entitled “Nutrition Standards in the National School Lunch and School Breakfast Programs”* is posted at: http://fns.dpi.wi.gov/fns_cnrsnp#fns.

11. How are veggie blends such as Malibu Veggies counted? The frozen vegetables in this particular mix include: broccoli, yellow carrots, and regular carrots?

Vegetable combination that contain at least 1/8 cup of vegetables from different subgroups may credit toward the appropriate subgroups when the quantity is known. A determination may be made by measuring out exact quantities from a bag of frozen Malibu vegetable blend. If the planned serving of a blend (i.e., 1/2 cup) contains at least 1/8 cup broccoli then the measured quantity in the serving counts towards the dark/green subgroup. Yellow and regular carrots are classified as red/orange vegetables so the measure quantity of both vegetables may count towards the red/orange vegetable subgroup. If the quantities of the different vegetables in a blend are not known or not of significance (less than 1/8 cup in a serving), the serving of the vegetable mixture counts towards the weekly minimums for the “other” vegetable subgroup or as additional vegetables. Vegetable combination from the same subgroup may count toward the single vegetable subgroup. An example is a carrots and sweet potatoes blend.

12. Does a company listing a salad mix of romaine and iceberg as a 50/50 blend cover “knowing” the quantity?

Yes. The label provides sufficient documentation.

13. Can you use a pre-made mixture of peas and carrots and count it as an “other” even though peas are in the starchy category?

Yes. Mixed vegetable blends that contain starchy vegetables may be credited toward the “other” vegetable subgroup. However, starchy vegetables that are NOT served in a mixture are only counted towards the starchy vegetable subgroup or as additional vegetables.

14. Are all beans considered starchy vegetables when served as fresh or immature?

Yes. If in doubt, check the newly revised Vegetables and Fruits Section of USDA’s **Food Buying Guide for Child Nutrition Programs – NLSP and SBP Only**. This resource is posted at: <http://www.teamnutrition.usda.gov/resources/foodbuyingguide.html>. However, edamame is considered a dry bean and pea due to its nutritional profile.

15. Are we allowed to offer 2 different kinds of vegetables each day? So for example, if I meet the meal pattern requirement for all the subgroups, could I still potentially serve starchy vegetables daily?

Yes. There are NO maximums on total vegetable servings or the servings of any of the vegetable subgroups. There are only minimum daily requirements and weekly requirements for the vegetable subgroups. Starchy vegetables cannot be substituted for the “other” vegetable subgroup, but may be counted as additional vegetables. A starchy vegetable may be planned for each day. Review nutrition facts for the processed starchy vegetables to determine how these products fit within the weekly dietary specifications established for calories, saturated fat and sodium.

16. Can we serve more than 1 cup of starchy vegetables per week?

Yes, as stated in the answer to question #15 in this section of the Q&A, there are no limits on ANY vegetable subgroup per week, but the meal pattern requirements for all the subgroups during the week must be met. Starchy vegetables cannot count towards the “other” vegetable subgroup but may be counted as additional vegetables. Review nutrition facts for the processed starchy vegetables to determine how these products fit within the weekly dietary specifications established for calories, saturated fat and sodium.

17. If I add kidney beans to chili, can it be counted as a beans/peas vegetable (legumes)?

It’s up to the menu planner to decide how the menu items will meet the lunch pattern requirements, but it is important to note that the kidney beans or other beans/peas (legumes) in the chili cannot be planned as BOTH the meat/meat alternate and the vegetable in the same menu item. For example, the kidney beans in vegetarian chili may be planned to meet the meat/meat alternate requirements for the lunch. However, chili with sufficient amounts of ground beef may satisfy the meat/meat alternate requirements for a lunch so the menu planner may count the kidney beans in the chili recipe as a daily vegetable serving. The quantity of beans in a serving of the recipe also counts towards meeting the weekly requirements for the beans/peas (legumes) vegetable subgroup. A planned serving must contain at least 1/8 cup of the kidney beans to count as a vegetable.

18. Why does red pepper count as red/orange, but green pepper counts as “other” and not dark green?

The vegetable subgroup classifications for the National School Lunch Program are consistent with the 2010 Dietary Guidelines for Americans (DGAs). The vegetables are classified among the 5 subgroups based on the nutrient profiles - NOT color. Red pepper provides a good source of Vitamin A as do many vegetables in the dark green and red/orange categories.

19. Do canned sweet potatoes count for the red/orange subgroup?

Yes. Canned sweet potatoes are included in the red/orange vegetable subgroup. When using canned products it is important to review the sodium levels on the nutrition facts labels the weekly sodium limits for the new meal pattern are not exceeded.

20. Would sweet potato puffs credit towards the red/orange vegetable subgroup?

Yes. These sweet potato products are creditable. The revised vegetable subsection of the Vegetables and Fruits Section of USDA's *Food Buying Guide for Child Nutrition Programs – NLSP and SBP Only* does not list frozen sweet potato puffs or fries yet so product yield information must be obtained from the manufacturer, if available. Keep in mind that 3 ounces by weight is not 3 ounces (3/8 cup) by measure nor does 3 ounces by weight equal ½ cup unless specified on the product information. USDA will allow manufacturers to use the yields for white potatoes for calculating yields of sweet potato products until yields for frozen sweet potato products are determined.

21. Is there a listing available that shows the portion sizes for crediting vegetables?

Refer to the revised Vegetables and Fruits Section of USDA's *Food Buying Guide for Child Nutrition Programs – NLSP and SBP Only* to find volume measure (usually ¼ cup) in a purchase unit (pound and/or specific can size) depending on how the vegetable is served or used in a recipe (cooked; unheated, drained; raw, shredded, etc.). This resource is posted at: <http://www.teamnutrition.usda.gov/resources/foodbuyingguide.html>. Another resource is USDA's interactive and simple to use *Food Buying Guide Online Calculator*. It is posted at: <http://fbg.nfsmi.org/>.

22. How do we know what type of squash is in the bag of frozen product?

Check with the distributor or the manufacturer to obtain more detailed product information if the label does not identify the type of squash. Winter squash varieties (acorn, butternut, hubbard) are categorized as red/orange vegetables and summer squash varieties (zucchini and yellow) are categorized as "other" vegetable subgroup based on the nutrition profile.

23. Can squash soup count as one of the vegetable subgroups?

Yes, if there is a school recipe, Child Nutrition (CN) label, or manufacturer's product formulation statement to document that the quantity of this vegetable in a serving of the soup. This documentation must show that the planned serving provides at least ⅛ cup of vegetable and reveal the type of squash so it is count it in the correct vegetable subgroup. Refer to vegetable subsection in the revised Vegetables and Fruits Section of USDA's *Food Buying Guide for Child Nutrition Programs – NLSP and SBP Only*. See pages 2-50 through 2-53.

24. If I serve spinach for breakfast, can that count towards my weekly subgroup requirement for lunch?

No. The school breakfast program and school lunch program are separate meals with individual meal pattern requirements. However, we do encourage schools to serve more dark green, red/orange and legumes at both breakfast and lunch.

25. Can cranberries be a red/orange vegetable?

No. Cranberries are listed in the fruit subsection of the revised Vegetables and Fruits Section of USDA's *Food Buying Guide for Child Nutrition Programs – NLSP and SBP Only*. See pages 2-73 through 2-74

26. May starchy vegetables count toward the “additional” vegetable subgroup requirements?

Yes. Starchy vegetables count as an additional vegetable but CANNOT count toward the “other” vegetable subgroup weekly minimum requirements. Note that “additional” is not a vegetable subgroup.

Meat/Meat Alternate Component:

1. Can an entrée that contains meat/meat alternate and legumes (ex: chili with beans) be credited areas as both a vegetable and a meat/meat alternate?

The amount of meat/meat alternate and dry beans used in the chili may be counted towards meeting the meat/meat alternate requirement. The menu planner may also choose to count only the creditable meat/meat alternate source towards the meat/meat alternate and count the dry beans (e.g., kidney beans) towards the vegetable requirements. The dry beans/peas (legumes) may be credited as a vegetable OR as meat alternate but not both in the same menu item. A serving of chili must contain at least 1/8 cup of the dry beans (kidney beans) to be counted as a vegetable. The dry beans credit toward the weekly requirement for the beans/peas (legumes) vegetable subgroup if there is 1/8 cup of beans in a serving.

2. How would a refried bean dish with enchilada sauce and cheese be credited?

The amount of cheese in the recipe is credited toward the meat/meat alternate component if there is at least 1/4 of ounce in a serving. The amount of refried beans may be credited toward either the meat/meat alternate component or the vegetable component, but not both. If refried beans are credited as a vegetable, they would contribute toward the weekly requirement for beans/peas (legumes). The dish must contain at least 1/8 cup of refried beans to count as a vegetable.

3. If you have a CN label that counts a bean and cheese burrito as 1 grain and 2 oz. meat/meat alternate, can you obtain a manufacturer statement that says a burrito contains 1 oz cheese (1 m/ma) and 1/2 cup beans and count as both vegetable and meat/meat alternate?

The Child Nutrition (CN) label or a complete and correct product formulation statement must specifically state that the bean and cheese burrito product provides 1 oz. cheese to equal 1 ounce equivalent of meat/meat alternate and 1/2 cup beans. If this specific information is provided, the burrito product may be counted as 1/2 cup vegetable serving. The prototype product formulation statement is posted on the DPI website under “crediting information” at http://fns.dpi.wi.gov/fns_topics. Select “Sample Product Formulation Statement (Product analysis) for Meat/Meat Alternate (M/MA) Products” on the webpage. Manufacturer should also specify what the burrito shell contributes to the grains/breads (for former food based menu planning options) or the grains (criteria for the new menu lunch pattern). Formulation revisions for products with creditable grains/breads will be required by manufacturers to determine how products meet the new grains criteria. USDA will allow use of the grains/breads or the grains criteria during the 2012-13 school year.

4. Can chicken soup count towards a meat/meat alternate if you know the amount of meat/meat alternate?

Yes. The standardized recipe for the chicken soup must document the amount of creditable chicken per serving. Use the *USDA Food Buying Guide* and manufacturer's statements to determine the yield for the chicken products used in the soup recipe. Divide the number of ounces of creditable chicken by the number of servings in the chicken soup recipe to determine ounces equivalents of meat/meat alternate in a serving. The soup must contain at least ¼ ounce to be credited. Any sources of ¼ ounce or more must be counted towards the weekly maximums set for the meat/meat alternate component. The chicken in the canned soup is not creditable unless there is a Child Nutrition (CN) label or manufacturer's product formulations statement for the purchased product.

5. Can a student have only ½ hamburger patty, chicken patty, etc. if that is all they want?

Daily lunch menus must be planned to offer students in grades K-5 and 6-8 the minimum of 1 ounce equivalent of the meat/meat alternate and to offer students in grades 9-12 the minimum 2 ounce equivalent meat/meat alternate. The student must take the planned portion in order for it to count as a component toward the reimbursable meal. If planned portion is a whole hamburger patty or chicken patty, the student must take the full patty. Under Offer versus Serve, a lunch that contains a ½ portion of the planned meat/meat alternate is reimbursable if appropriate selections of the other 3 lunch components (i.e., milk, grains, fruits and or vegetables) are made. In addition, if an SFA allows students to take a half portion, the half portion of meat and grains could be counted as their daily minimums (as long as they meet the daily minimum requirements). Refer to Question #20 under the Offer versus Serve section of this Q&A for further information.

6. What is the measurement of cheese that would count as a garnish versus counting towards meat/meat alternate?

The minimum creditable amount of meat/meat alternate is ¼ ounce equivalent, so less than ¼ ounce of meat/meat alternate per serving would not count toward the daily or the weekly maximums for the meat/meat alternate component. Keep in mind that all items offered as part of the lunch are counted when determining if the planned menu is meeting dietary specifications established for calories, saturated fat, and sodium.

7. Can you still sell extra servings of meat at lunch?

Yes, extra servings of meat/meat alternate and/or any of the meal components can be sold a la carte.

8. If we offer cottage cheese on a salad bar, does that count towards the weekly maximum of meat/meat alternate that can be offered?

The answer depends on the planned serving size. Meat/meat alternates offered on salad bars and other serving lines that are greater than ¼ ounce equivalents per serving contribute towards the daily and weekly minimum and maximums. The menu planners must pre-determine serving sizes when cottage cheese, cheese and other meat/meat alternates are offered and establish appropriate portion control for all serving lines, including salad bars. Pre-portioning the cottage cheese is one way to assist students with selecting the planned serving as well as utilizing appropriate serving utensils and/or signage. Menu planners may also consider offering the cottage cheese as the meat/meat alternate for a reimbursable salad bar meal and not make it available to students who

are only selecting vegetables and fruits on the salad bar. All food items, creditable and non-creditable are included in the nutrient analysis conducted as part of the administrative reviews.

9. Can yogurt or any other meat/meat alternate (beans) be added to a smoothie or a milkshake be counted towards meeting the meat/meat alternate requirement?

No. Yogurt or any other meat/meat alternate in a smoothie or milkshake cannot contribute toward the meat/meat alternate. The meat/meat alternate component cannot be served as a beverage. However, smoothies may be credited at any meal, but it is not recommended to serve smoothies at breakfast and lunch in the same day. In addition, milk shakes and smoothies including milk, pureed fruit and creditable fruit/100 percent full strength juice count towards the milk and fruit juice component at lunch if offered separately and then blended/processed into a beverage. Per USDA instruction, all components of the reimbursable lunch must be easily recognizable. Schools may serve a “blended yogurt” for lunch or for breakfast” if it is served with a spoon. Using a straw makes this food item a beverage. Refer to USDA memo entitled “*Smoothies Offered in Child Nutrition Programs*” SP 36-2012, CACFP 17-2012, SFSP 13-2012, July 11, 2012 posted at: http://fns.dpi.wi.gov/fns_menuspln.

Grains Component:

1. If you offer extra bread on your serving line would that also count towards your grain maximum? Usually this bread is used as a filler when students are still hungry.

Yes, the extra bread on the serving line would count toward the weekly grains maximum if students have access to the bread as a part of the reimbursable meal. If the extra bread is sold as an a la carte item, it is not counted it toward the weekly grains maximum. Establish appropriate charge for a la carte items to cover all costs associated with the sales including any condiments (butter, peanut butter, etc.). In addition, measures must be taken to maintain separate financial records for the revenue and expenditures from all a la carte sales.

2. Can you exceed the maximum daily and/or weekly grain requirements if you are having a difficult time meeting the calorie requirements after you've met the fruit and vegetable sub groups, milk and m/ma requirements or are we restricted to the 2/day and 10-12 per week? For example, can we occasionally have 3 breads/grains or 13 or 14 grains per week to meet the calories requirements?

The new meal pattern requirements do not have daily maximums for grains, just daily minimum serving sizes based on ounce equivalencies (oz eq). At a minimum one oz eq must be planned each day for the K-5 and 6-8 grade groupings and 2 oz eq is the daily minimum requirement for the 9-12 grade group. To meet the WEEKLY range requirements, more than more than one oz eq of grains must be offered on some days during the week. Three oz eq of grains per day is allowed, however, the planned menu cannot exceed the weekly maximums of 9 servings for grades K-5, 10 servings for grades 6-8 and 12 servings for grade 9-12. The weekly servings of grains are intended to help schools offer age-appropriate meals within the established calorie ranges.

3. We've been told that the grain crediting will be changing to 16 grams of flour per serving vs. the 14.75 g. When will this go into effect?

Effective on July 1, 2013, baked goods such as breads, biscuits, bagels, etc. must contain 16 grams of creditable grains to provide 1 ounce equivalent (oz eq) grains serving. Weights of baked goods in the current USDA Food Buying Guide’s *Exhibit A, Grains/Breads For Food-Based Menu*

Planning Alternatives in Child Nutrition Programs, found on pages 3-15 and 3-16, are based 14.75 grams of creditable grains. The exceptions are for the items in:

- Group H - cooked cereals and pasta, 1 grains bread serving is ½ cup or 25 grams dry
 - Group I - ready-to-eat cereal , one grains/breads is ¾ cup or 1 ounce whichever is less
- USDA has updated the existing instruction to ***Exhibit A: School Lunch and Breakfast Whole Grain-Rich Ounce Equivalency (OZ EQ) Requirement for School Meal Programs***. These instructions incorporate the requirements for baked goods as well as the cereal grains (oatmeal, pastas, brown rice, etc.) and the ready to eat-to-eat cereals. Refer to *USDA Memo: SP 30-2012, Grains Requirements for the National School Lunch Program and School Breakfast Program, dated April 26, 2012* for further information and to find the updated Appendix A chart. These items are posted at: http://fns.dpi.wi.gov/files/fns/pdf/gm_nslp_sp_30_2012.pdf.

4. In 2014 can we still offer saltine crackers with soup and dumplings in chicken soup?

Effective July 1, 2014, ALL grains offered for National School Lunch Program and the School Breakfast Program must be whole grain-rich.

5. In terms of whole grain rich requirements, is pumpkin bread treated as a grain-based product or a mixed dish?

Pumpkin in pumpkin bread does NOT contribute to the vegetable component so the quick bread is not considered a “mixed dish”. This rule also applies to raisins and fruit used in quick bread recipes. Check the recipe to determine if the flour and whole-meal grains meet the whole grain-rich requirements. For purchased products, the first *grain* ingredient on the label must be a whole grain or the whole grain must be at least 8.0 grams per ounce equivalent to be whole grain-rich. Refer to USDA Memo: SP 30-2012, Grains Requirements for the National School Lunch Program and School Breakfast Program, dated April 26, 2012 for further information about whole grain-rich criteria posted at: http://fns.dpi.wi.gov/files/fns/pdf/gm_nslp_sp_30_2012.pdf.

6. Can you confirm that the bottom line is that there should be enough creditable grain in the recipe (at least 14.75 g) and at least half of that should be from a whole grain ingredient? In other words, if this were a school-based recipe, would whole-grains have to be 50% by weight of the entire recipe or just the total grains?

To be considered whole grain-rich at least 50% of the total weight of the grains in a recipe must be whole grain. Beginning with the 2013-14 school year, 16 grams of creditable grains is needed in order to provide 1 ounce equivalent of grains for baked products. Note that there is a different criterion for the cooked cereals, pasta and for ready-to-eat cereals.

7. Is durum wheat considered a whole grain?

No, not unless the ingredient is listed as “*whole* durum wheat”.

8. Some of our products state “Enriched Flour” as the first ingredient, I am reading that as long as the product is large enough according to the charts in the Food Buying Guide, Exhibit A, that these meet the requirements for grains. I guess my question is, as long as it is enriched it doesn’t need to be whole wheat correct?

No. “Enriched” most often means that a grain has been refined and that certain nutrients removed in the processing were added back. Whole grains are composed of an entire kernel - the bran, germ and endosperm. Occasionally, you may see enriched whole grain-rich products. Whole grains not only contain dietary fiber but other important nutrients such as selenium, potassium and

magnesium that are not added back after processing. There is a three year phase in for whole grain rich requirement for the lunch and breakfast programs:

- Beginning July 1, 2012 (2012-13 school year), half of the grains offered during the week must meet the whole grain-rich criteria for the school lunch program. During that time you can still serve products that have enriched flour as their first ingredient as long as half of the grains offered during the week are whole grain-rich. This requirement is in effect for the 2013-14 school year for lunch, too.
- Beginning July 1, 2013 (School Year 2013-14), half the grains offered at breakfast must be whole grain enriched.
- Beginning July 1, 2014 (School Year 2014-15), all grains served at lunch and breakfast must meet the whole grain-rich criteria.

Refer to USDA *Memo: SP 30-2012, Grains Requirements for the National School Lunch Program and School Breakfast Program, dated April 26, 2012* for further information about whole grain-rich criteria posted at: http://fns.dpi.wi.gov/files/fns/pdf/gm_nslp_sp_30_2012.pdf.

9. Do all products offered have to be a minimum of 50% whole grain? Or can you offer white bread and wheat bread as long as half of the weekly servings are whole grain rich?

Yes, you can offer a combination of white and whole-grain rich bread over the course of the week to meet the 50% whole-grain rich requirement until 2014-15. See the phased in implementation plan provided in the response to question #8 in this section of the Q&A. During the phase in periods, the menu planner has discretion when deciding when and how to offer whole grain-rich items as long as the applicable whole grain-rich requirement is met. Menu planners are encouraged to offer whole grain-rich items often to facilitate student acceptability and transition to all who grain-rich products in 2014-15 for lunches and breakfast.

10. If water is the first ingredient in a bread product, vs. the flour, do we need to get a manufacturer's statement documenting the amount of creditable grain(s) in one portion? We have a couple buns in which water is the first ingredient and flour is the second.

“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.” Reference: *Question #12 on page 15 of USDA Questions and Answers on the Final Rule, “Nutrition Standards in the National School Lunch and School Breakfast Programs”, Third Revision, July 13, 2012* posted at: http://fns.dpi.wi.gov/fns_cnrsnp#ns.

Schools may continue to credit baked good products such as buns based on the current 14.75 grams of grains per serving through School Year 2012-13 (Exhibit A on pages 3-15 and 3-16 of USDA's *Food Buying Guide*). All baked good products must be credited based 16 grams of grains per ounce equivalent (oz eq) beginning on July 1, 2013 per the new Exhibit A *School Lunch and Breakfast, Whole Grain –Rich Ounce Equivalencies (OZ) for School Meal Programs* that is posted at: http://fns.dpi.wi.gov/files/fns/pdf/gm_nslp_sp_30_2012.pdf.

11. New meal pattern for grains is given in oz eq – for example, 2 oz eq is daily requirement for 9-12 graders. Since the oz eq requirements for grains (Exhibit A) are not required until 7/1/13, what is the daily grain requirement for 9-12 graders for the

2012-13 SY? Will 2 servings (original Exhibit A) meet the 2 oz eq (new Exhibit A) requirement? Do they convert to new oz eq - for example, 50 gm bun divided by 28 gm (new Exhibit A) instead of 25 gm (original Exhibit A)?

In the 2012-2103 school year, a menu planner has total flexibility when making decisions about following the CURRENT grains breads instructions or the new grains instructions. Baked good products may continue to be counts according to the 14.75 g of creditable grains per serving during this one year grace period. To meet the daily 2 oz eq for grades 9-12, the menu planner may offer 2 servings of “bread or bread alternates”, under the guidance provided in USDA’s Food Buying Guide on pages 3-1 to 3-32 or the new criteria which is included in USDA Guidance Memo SP 30-2012. This resource is posted at: http://fns.dpi.wi.gov/files/fns/pdf/gm_nslp_sp_30_2012.pdf. The menu planner also has discretion when counting the breading on meal/meat alternate products greater than ¼ ounce equivalent toward the daily and weekly grains requirements during this one year grace period. Beginning in school year 2013-14, all grains equal to or greater than ¼ ounce equivalent must be counter toward the weekly grains range (including the battered or breaded products and items such as croutons on the salad bar).

Reference: *Question #15 on page16 of USDA Questions and Answers on the Final Rule, “nutrition Standards in the National School Lunch and School Breakfast Programs”, Third Revision, July 13, 2012 posted at: http://fns.dpi.wi.gov/fns_cnrsnp#ns.*

12. Are SFAs able to use the new guidance with the oz eq for SY 2012-13? If so, how would they calculate the grain contribution of a 65 gm pizza crust using the new grains Exhibit A?

Yes, School Food Authorities (SFAs) may choose to use the new guidance for SY 2012-13. If this is a purchased pizza product, find out the baked weight of the crust and divide the weight by 28 grams or 1 ounce, per information found in Group B of the new Exhibit A. A portion of baked pizza crust without sauce, cheese or other toppings weighing 65 grams divided by 28 equals 2.428 rounded down to the nearest ¼ oz eq is equal to 2.25 eq oz. If this is a school made recipe, follow these steps: (1) add up the total pounds of creditable grains in the recipe (2) convert the pounds to grams by multiplying the number of pounds of creditable grains by 453.6 (3) Divide the total grams of creditable grains by the number of servings in the recipe (4) Divide the total grams of creditable grains by in one portion by 16 (5) Round down to the nearest ¼ oz eq. *Reference: Paragraph 2, page 5, USDA Memo: SP 30-2012, Grains Requirements for the National School Lunch Program and School Breakfast Program, posted at: http://fns.dpi.wi.gov/files/fns/pdf/gm_nslp_sp_30_2012.pdf.* Manufacturers are also instructed to follow this formula when computing oz eq for products.

13. Can breaded products count at the elementary schools but not count at the secondary schools for this school year (2012-2013).

Yes, for school year 2012-2013 only. USDA is allowing the menu planner to decide if and when the breading or batter on meat/meat alternate products may toward the daily minimum and weekly eq oz ranges for grains. Beginning in school year 2013-14, all grains equal to or greater than ¼ ounce equivalent must be counter toward the weekly grains range (including the battered or breaded products and items such as croutons on the salad bar).

Reference: *Question #15 on page16 of USDA Questions and Answers on the Final Rule, “Nutrition Standards in the National School Lunch and School Breakfast Programs”, Third Revision, July 13, 2012 posted at: http://fns.dpi.wi.gov/fns_cnrsnp#ns.*

14. Do grain based desserts count toward the maximum grains per week.

Yes, grain based desserts do count toward the maximum grains for the week when a serving of the dessert is at least ¼ ounce equivalents of grains. Keep in mind that grain based desserts are limited to 2 ounce equivalents (oz eq) per week. Therefore, a 2 oz eq dessert may be offered once a week or a .5oz eq dessert may be offered four times in a week. The grain based desserts count towards the nutrient standards established for calories and saturated fat, too. With the stringency of the new meal pattern, added sugar, fat and salt are not recommended. Reference: *Question #16 on page16 of USDA Questions and Answers on the Final Rule, "Nutrition Standards in the National School Lunch and School Breakfast Programs", Third Revision, July 13, 2012 posted at:*

http://fns.dpi.wi.gov/fns_cnrsnp#ns.

Note: Sweet crackers (graham crackers – all shapes and animal crackers) are allowed only as a dessert at lunch. See the footnote on the new *Exhibit A: School Lunch and Breakfast, Whole Grain –Rich Ounce Equivalencies (OZ) for School Meal Programs* posted at:

http://fns.dpi.wi.gov/files/fns/pdf/gm_nslp_sp_30_2012.pdf.

15. Will Exhibit A be changed when the whole grain requirement changes?

Exhibit A of the USDA's *Food Buying Guide* was revised to reflect the new grain requirements. This updated version and the grain requirements for the National School Lunch and School Breakfast memo, SP 30 – 2012 is posted on USDA's website at:

<http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2012/SP30-2012os.pdf>. USDA is updating the entire grains section of the *Food Buying Guide* and it is expected to be released soon.

16. How do you incorporate 2 grains daily into the 9th – 12th grades?

Many of the baked products (hamburger buns, hot dog buns, tortillas, etc.) that have been served on a daily basis at schools credit as the 2 ounce equivalent (oz eq) serving required for the new meal pattern requirements. A product that weighs 2 ounces is 2 oz eq. One cup of cooked pasta is 2 oz eq. A ½ cup of rice plus 1 ounce dinner roll total 2 oz eq grains.

17. When can you round up or round down?

Grain serving sizes must always be rounded down to the nearest ¼ ounce equivalent (eq oz). For example, a hamburger bun that weighs 1.9 ounces divided by 1 eq oz is round down to 1.75 ounces and credited as 1-¾ oz. eq when using the new *Exhibit A: School Lunch and Breakfast, Whole Grain –Rich Ounce Equivalencies (OZ) for School Meal Programs* posted at:

http://fns.dpi.wi.gov/files/fns/pdf/gm_nslp_sp_30_2012.pdf.

18. If you prepare rice that is ½ white rice and ½ brown rice how would that count towards your grain if the student gets ½ cup?

A ½ cup serving would credit as 1 ounce equivalent (oz eq) grains and be considered whole grain-rich since half of the grain in a serving is whole grain.

19. Is there a daily maximum for grains?

No. There are daily minimums and WEEKLY minimums and maximums for the grade groups that must be met beginning July 1, 2012 for lunch.

20. If a Child Nutrition (CN) label states that it provides 1 grains/bread serving does it meet the 1 oz equivalent of new bread serving standards?

Yes. The grains/breads OR the new grains criteria can be used for the 2012-2013 school year only. This transition period was granted to allow manufacturers time to adjust their product formulations. Beginning school year 2013-2014 all products must meet the new ounce equivalent serving size criteria for the grains component. It is based 16 grams for most items within the grains component. See 1 ounce criteria for cereal grains and ready-to eat cereal stated on page 4 of *USDA Memo: SP 30-2012, Grains Requirements for the National School Lunch Program and School Breakfast Program*, posted at: http://fns.dpi.wi.gov/files/fns/pdf/gm_nslp_sp_30_2012.pdf.

21. If I'm at a large high school with multiple service stations (i.e. pizza, deli, bowl entrees, etc.) do the bread/grains need to be counted by station or by the whole cafeteria?

Each service station/line must be planned to meet the daily minimum and weekly range requirements established for grains.

Milk Component:

1. Why does USDA insist on milk being a major part of meals?

Milk and milk products contribute a number of nutrients including calcium, vitamin D and potassium to the diet. The 2010 Dietary Guidelines for Americans recommend a daily intake of 3 cups of fat-free or low-fat milk and milk products for adults and children and adolescents ages 9 to 18 years and 2 ½ cups per day for children ages 4 to 8 years. To be consistent with these guidelines, USDA continues to include milk as a daily component of the meal pattern requirements for lunch and breakfast.

2. Can you clarify the requirement for milk variety please? I thought it was a variety of fat content, not variety of flavor.

“Variety” when it relates to the milk component has changed. To meet current meal pattern requirements two different fat-free or low fat milk types must be offered. Here are 3 examples of milk type combinations that may be offered for lunch, breakfast and the after school snack programs: 1% unflavored and fat-free chocolate milk; fat-free unflavored and fat free chocolate milk; 1% unflavored and fat-free unflavored. Please note that 1% flavored is not allowed.

3. Do you have to offer two kinds of milk at breakfast?

Yes, two varieties must be offered for the school breakfast program and the varieties are limited to fat-free (flavored, or unflavored) and low-fat (unflavored) milk. See the various combinations in the response to question #2 in this section of the Q&A.

4. Can students still take 2 milks at lunch or breakfast?

The minimum requirement for the milk component of the lunch and breakfast is 1 cup (1/2 pint). The School Food Authority (SFA) may allow students to take more than 1 cup of milk but the additional amount of milk offered to students must be included when determining if the school is meeting dietary specifications established for calories, saturated fat, and sodium. Given these restrictions, school food authorities are encouraged to follow the meal pattern by allowing only 1 cup of milk and permit students to purchase additional servings of milk for an appropriate a la carte price. Second milk servings may be sold a la carte.

5. Can 1% chocolate, 1% strawberry, and 2% chocolate be served in vending areas?

The guidance on the nutrition standards for competitive foods has not yet been released by USDA. At this time there are no regulations that would prohibit the sale of these milk types in the area where reimbursable meals are served and elsewhere on school premises. This practice is not recommended as it sends mixed messages to the students.

Multiple Lines:

1. How do SFAs figure out who takes what when one line is a salad bar and two other lines offer a main dish and pizza every day?

Use daily production records to determine the number of servings and/or quantity of items needed to provide each student with an opportunity to receive all required components in the planned portion sizes without waste. Modifications may be made to prepare what students typically take under Offer versus Serve.

2. If I have multiple lines can I offer all the vegetable subgroups on a salad bar instead of each of the separate serving lines?

Yes, if the salad bar is available daily and assessable to all students. A central location for the salad bar is recommended.

Salad Bars:

1. Can an adult volunteer monitor the salad bar after the Point of Service (POS) to make sure portions are met? Or does it need to be a paid staff member?

USDA policy memo provides guidance for monitoring students' selections at the salad bar. USDA recommends that trained food service staff members monitor the salad bars, rather than volunteers, to accurately assess the quantities selections and for food safety reasons. *Reference:* <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2011/SP02-2011osr.pdf>.

2. Where can we obtain signage for salad bars?

School agencies may laminate actual pictures (i.e. 5 carrots) for placement on the self serve salad bars. Visuals are a great tool for children and are especially helpful at the beginning of the school year. Use Velcro to attach signage to the sneeze guard. Use a search engine to find available commercial products advertised on the internet.

3. May the salad bar be offered to only certain grades within a school such as 6-8 graders in a K-8 building?

Yes. There are no regulations that prohibit a school from offering a salad bar to certain grades. The salad bar available only to grades 6-8 may include vegetable subgroups. The meal service line planned for students in grades K-5 without the salad bar must incorporate the required vegetable subgroups throughout the week. Separate records are needed for the two grade groups if the salad bar is offered each day to document how the daily and weekly meal pattern requirements are met for the planned lunches. A combined production records may be kept on days the salad bar is not available.

4. Can you offer a salad bar 2-3 times per week and offer other meals on a traditional line with subgroups on the other days?

Yes, as long as provisions are made to meet the vegetable subgroups throughout the week and the daily minimum requirements for fruit and vegetable components are offered each day. Production records must be kept to document that the lunches were appropriately planned. The portion sizes for the dark green, red/orange, beans/peas, starchy, and other vegetable subgroups MUST be specified for EACH day of lunch service.

5. Does a salad bar have to be broken down by servings per individual item on the production record?

Yes. Daily production records must state the planned portion size for all menu items that make a contribution towards meeting the meal pattern requirements. Individual portion sizes of items intended as garnishes for vegetables and fruits (less than 1/8 cup serving) and condiments do not have to be designated on the production record. It is acceptable to record total daily usage for those items. Please note that cheese and other meat/meat alternates available on the salad bar must be counted towards the weekly maximum requirements when the serving size is at least 1/4 ounce equivalent. This crediting requirement also applies to grains for portions that are 1/4 ounce equivalent or more. The portion sizes for the dark green, red/orange, beans/peas, starchy, and other vegetable subgroups MUST be specified for EACH day of lunch service.

6. We have a full salad bar with daily soup, and the soup is available at no extra charge. Does the soup have to be listed on the production record? How is it credited?

All menu items that are considered part of the reimbursable lunch MUST be recorded on the daily production records. Estimate the amount of soup that accompanies reimbursable meals if the soup is also sold a la carte and/or available to adults. The soup is included when the nutrient analysis is conducted for a week's menu to assess compliance with the dietary specifications established for total calories, saturated fat, and sodium. A recipe or product information is needed to determine how much creditable vegetable, grains, and/or meat/meat alternate is in a serving of the soup. The planned serving must contain at least 1/8 cup to be considered a creditable vegetable. The recipe or product information may also reveal that the soup contains 1/4 ounce equivalents of creditable meat/meat alternate and/or 1/4 ounce equivalents for grains which must be counted towards the weekly maximum servings for those lunch components.

7. A Food Service Director is considering adding a salad bar at both the high school and the elementary school as a way to meet the weekly vegetable subgroup requirements and the fruit requirements. At the high school, he's having problems trying to configure the line to include the salad bar and is thinking about setting it out in the cafeteria for the students as an "extra". Do fruits and vegetables located after the point of service count towards meeting the daily fruit and vegetable requirements and the vegetable subgroup requirements?

No. Fruits and vegetables that are counted towards meeting the daily or weekly vegetable subgroup requirements must be located prior to the point of service where a determination is made that lunches are reimbursable. There must be a system in place to ensure that each reimbursable lunch selected by students under Offer Versus Serve includes a 1/2 cup of fruit and/or vegetable.

8. If the same vegetables (carrots, broccoli, red peppers, spinach salad, cucumbers, and cauliflower) are offered each day on the salad bar, can these items be counted towards the weekly sub groups requirements?

Yes. Any vegetables offered on the salad bar or as vegetable choices on the serving line may be used to meet pattern requirements. Variety within subgroups is encouraged but not required. When offering an array of vegetables each day, establish the planned portion size for each item and take necessary measures to ensure that students select what is planned by providing appropriate serving utensils, pre-portioning and/or posting signs. Specify the vegetable and the planned portions for each of the vegetable subgroups on the daily production record. For example, the carrots and red peppers contribute to the red/orange subgroup; broccoli and spinach to the dark green subgroup; and cucumbers and cauliflower contributed to the “other” subgroup. A garden bar production record has been developed by DPI to assist schools with recordkeeping. It is posted at:

http://fns.dpi.wi.gov/fns_menupln.

Schools must offer the minimum quantity requirements for each vegetable subgroup but the students are not required to take any specific subgroup under Offer versus Serve. To count as a reimbursable meal, students can select any one or combination of at least 1/8 cup of vegetables and/ or fruit to total 1/2 cup. Refer to question 1 in the Offer versus Serve section of the Q&A for information about the 1/2 cup allowance when students select 3 components and two of those components are fruit and the vegetable

9. How are the calories from vegetable and fruit bar determined when there are no established serving sizes? What measures are needed to ensure that the students take what is needed?

Caloric contribution of the service bars are based on the planned portions or actual usage. When offering self-service bars, the planned portion sizes for each item must be established for the creditable items to document that daily and weekly meal pattern requirements are met. Portion control measures must be implemented so students make appropriate selections. These measures include pre-portioning, use of designated utensils or posting signs and/or pictures. There are no requirements for establishing portions sizes for condiments and garnishes. Record planned and actual usage on the production record for these items.

10. If a salad bar is available daily that contains all the vegetable subgroups, fruit, and meat/meat alternate components, must a grains/bread component also be available on the salad bar?

Students must be offered the opportunity to select a meal that contains the required components consistent with the daily and weekly meal pattern requirements. It does not matter when the grains component is located if it is accessible to all students.

11. If there is no space to offer a garden bar on one of the serving lines, is it possible to offer the requirements in individual portions?

Yes. If space is not available for a garden bar on one or more serving lines, the school may offer individual portions of the vegetables and/or fruits to meet daily requirements and/or weekly vegetable subgroup requirements. Another option is to utilize existing space by setting up one centralized garden bar accessible to students from all serving lines.

Pre-Pack Systems:

- 1. When using a pre-pack system for the K-5 grade group where there are only two compartments, ½ cup and slightly larger than ½ cup, in the trays, how do we fit the ¾ cup of vegetable in the hot pack when the cold-pack is full with ½ cup fruit and grain/bread?**

An additional tray may be needed or pre-packaged vegetables may be served in addition to the cold pack. Another option is include the grains component in the hot pack to provide space for the unheated vegetables in the cold pack.

- 2. Elementary students have a daily choice of two hot menu packs with the same cold pack. Each choice of hot packs (A & B) along with the cold pack meets the weekly vegetable subgroups requirement by themselves. Is this acceptable?**

Yes, as long as each choice meets the weekly requirements.

- 3. The following hot and cold-packs are offered to students in K-5 with the Offer versus Serve option (3 of 5 food items) in place. Could the student just take one of the pre-packs and milk, turning down both the opposite pack and the extra vegetable package and have a reimbursable meal?**

Hot-pack	Cold-pack
2 oz meat/meat alternate	1 grain/bread
½ c vegetable	½ cup fruit
Package of ¼ cup vegetable available separately	
1 cup milk	

The answer is “Yes”.

Bag meals (including field trips):

- 1. If a class is going on a field-trip, must a vegetable be included in the bag lunch?**

Yes. Students MUST have access to all 5 components of lunch. The bag lunch must include a fruit, vegetable, grains, meat/meat alternate and milk and the planned servings of these components must be consistent with the daily meal pattern requirements.

- 2. Some of our schools close early on Fridays and they get bag lunches. Do they need to meet weekly meal pattern requirements? For example green leafy, red/orange vegetables?**

Yes. The weekly vegetable subgroup requirements must be met over the course of the week for the bag lunch because this optional meal type is not offered as an occasional field trip meal.

- 3. If a grade school has a menu for a field trip reimbursable lunch, how would that work with the vegetable subgroups? Are they allowed to have a menu like the one below if it fits into the average weekly calorie and sodium level for each grade group? There is no OVS for this school.**

Sub Sandwich (2 bread/ 2 meat/meat alternate)

½ Apple = ½ cup fruit

¾ cup baby carrots = ¾ cup vegetable

8 fl oz Milk = 1 cup milk

Cookie

Students on a field trip must be offered lunches that meet the daily meal component requirements and are consistent with the dietary specifications (calories, saturated fat, and sodium). The menu planner is not required to adjust the weekly menu to take into account occasional field trips nor does not have to incorporate the same vegetable subgroups for the field trip meal. Reference: *Question #7 on page 22 of USDA Questions and Answers on the Final Rule entitled “Nutrition Standards in the National School Lunch and School Breakfast Programs”, Third Revision, July 13, 2012 posted at: http://fns.dpi.wi.gov/fns_cnrsnp#ns.*

4. What about field trip bag lunches that go out Monday-Friday?

It is assumed that field trip bag lunches are served to individual students on an occasional bases as described in question 2 of this section of the Q&A. The bag lunches are prepared for all planned field trips on Monday through Friday but go to different students each day. As stated in the response to question 2 above, field trip bag lunches claimed for reimbursement must meet the daily requirements for the specific grade groups. If bag lunches are available to students as a menu option on one or more days during the week, not just for field trips, the bag lunch option is an independent serving line and provisions must be made to meet both daily and weekly requirements.

Age/Grade Groups:

1. We have a building with grades 5-6. Which grade level do we follow?

When the meal requirements for the grade K-5 and grade 6-8 age/grade groups overlap, a single menu can be used to meet the needs of students in grades K-8. This USDA allowance also applies to grades 5-6. There is no change for the fruit and vegetables because both grade groupings have the same minimum requirements for these components. However, in order to accommodate the average daily nutrient limits and weekly minimum/maximums for both grains and meat/meat alternates, the menu planner must work within the following parameters established by USDA for the K-8 grade grouping:

- 8-9 oz equivalent grains/week (minimum 1 oz equivalent/day)
- 9-10 oz equivalent meat/meat alternates/week (minimum 1 oz equivalent/day)
- Average daily calorie range of 600-650
- Average daily sodium limit ≤640 mg (final target for school year 2022-23. Since sodium is an upper limit, schools must always follow the lower age group requirement for multiple grade groups. In this case the grade K-5 limits would apply.

Reference: Reference: *Question #1 on page 30 of USDA Questions and Answers on the Final Rule, “Nutrition Standards in the National School Lunch and School Breakfast Programs”, Third Revision, July 13, 2012 posted at: http://fns.dpi.wi.gov/fns_cnrsnp#ns.*

2. Our elementary school has grades K-6. Can we have the 6th grade use the same portions as K-5?

As stated in the response to question #1 of this section of the Q&A, the menu planner may choose to use the meal pattern for grades K-8.

3. Our buildings are split K-4, 5-8, 9-12. Because the 5th grade is just one grade below the new 6-8 grade group, can I just use the 6-8th grade group meal pattern requirements for the 5-8 grade building?

No, the new meal pattern does not allow for schools with a grade configuration with one grade above or below the grade grouping to follow the predominant grade group requirements (as was previously allowed for Nutrient Standard Menu Planning). As stated in the response to question #1 in this section of the Q & A, the menu planner may offer students in grades K-8 the same quantities because of the overlap for students in grades K-5 and in grades 6-8. Refer to the response in Question #1 of this section of the Q&A for the meal pattern for grades K-8.

4. A school district has a building with only grades 8 & 9, and students from both grades come to the cafeteria at the same time. What grade grouping(s) are they expected to use for menu planning purposes?

The meal patterns are designed for grade K-5, grade 6-8, and grade 9-12 with NO grade deviation. Meals planned for students in grades must meet grade 6-8 requirements and meals planned for students in grades 9 must be planned to meet the 9-12 grade group requirements. The menu planner may adjust portions to meet the weekly maximum for the 6-8 grade group and the minimums for the 9-12 grade group by:

- Planning 10 ounce equivalents of grains for grades 8-9 for the week.
- Planning 10 ounce equivalent of the meat/meat alternate for the week.

There are no maximums for the fruit and vegetable components so 8th graders may be offered 1 cup minimum of fruits and 1 cup of vegetables which are the daily minimum requirements for the 9th graders. The menu planner may choose to provide smaller portions for grade 8 that are consistent with the grade 6-8 grade grouping requirements if there are concerns about waste. Use a color coding if portion sizes are varied to inform students about what was planned for their grade. See the response to question #5 in this section for further details pertaining to accommodating grade 6-8 and grade 9-12.

5. How could menus be planned if both 6-8 and 9-12 grade groups are within one school?

One way to approach menu planning is to start with the portion sizes that are appropriate for grades 6-8, then make adjustments for grade 9-12. These adjustments include planning:

- 1 cup fruits and 1 cup vegetables for both grade groups if such offerings do not exceed the calorie limit for the grade 6-8 group and the larger servings are acceptable to these students. There are no daily or weekly maximums for the vegetable and fruit components.
- Additional ½ cup of vegetable(s) in red/orange vegetable subgroup, an additional ¼ cup from vegetables in the “other” subgroup, and an additional ½ cup vegetables from any of the subgroup during the week.

Consider planning 2 ounce equivalents of the grains for students in grades 6-8 each day which will not exceed the maximum 10 ounce equivalents for the week. Provide sufficient calories for students in grades 9-12 by offering 2 additional ounce equivalents during the week (e.g., offer a larger sandwich or sub bun). The maximum ounce equivalents for students in grades 6-8 is the same as the minimum ounce equivalents for grades 9-12 so the menu planner may consider a 2 ounce portion of meat/meat alternate for each day.

6. How can meals be monitored for 6-8 graders attending a Charter School housed in the high school who have access to all food courts planned to meet meal requirements for 9-12 grade group?

Minimize the challenge of monitor food selections for both 6-8 graders and 9-12 graders in the same building by:

- Adjusting the serving times so only one grade group is in the lunchroom at a time.
- Implement menu planning suggestion offered in question #5 of this section of the Q&A.
- Use a color code system to designate portion sizes for the different grade groups.

The trained person must be located at the point of service (end of line) to monitor the food selections and assists students with selecting appropriate portion sizes to meet the meal pattern requirements for their respective grade group.

7. Is 4K considered kindergarten?

4K is considered Pre-K. The K-5 grade group for the new meal pattern is designated for students from ages 5 to 10. Menu planners must follow the current menu planning requirements for all students in Pre-K until further guidance is released. Refer to question 4 on pages 21-22 of *USDA Questions and Answers on the Final Rule, "Nutrition Standards in the National School Lunch and School Breakfast Programs", Third Revision, July 13, 2012* posted at:

http://fns.dpi.wi.gov/fns_cnrsnp#ns. See question #8 in this section of the Q& A.

8. You mentioned that preschool, or 4K, currently has no new guidelines written for the 2012-13 school year and we are to follow the old guidelines. If we are required to follow the preschool guidelines do we have to follow traditional or enhanced or is this our choice?

The meal pattern for Pre-K students will be updated through a future rule changes for the Child and Adult Care Food Program meal patterns to ensure that meal requirements for preschoolers are the same across the Child Nutrition Programs. Until then, menu planners are instructed to follow the Traditional Meal Planning option, ages 1-2 and/or 3-4 for Pre-K students. Refer to page I-7 of the *Food Buying Guide* for this menu pattern. The *Food Buying Guide* is posted at: <http://www.fns.usda.gov/tn/Resources/foodbuyingguide.html>. The menu planner may choose to use a single menu to meet the meal requirements for both the Pre-K and K-5 grades but modifications must be made to ensure separate meal pattern requirements are followed. The fat-free and low-fat milk requirements do apply to 3-4 year olds even though there are no other meal pattern changes for this age/grade group at this time.

Offer versus Serve:

- 1. The new regulations say that we have to make sure each student has ½ cup fruit or vegetable on their tray or a combination of fruit or vegetable to equal ½ cup. But why did the session on offer vs. serve say that sometimes you need to also have the full serving of the fruit or vegetable on the tray to count. How am I suppose to know what needs to be on the tray?**

It is complicated. The new meal pattern rules USDA requires students to select at least ½ cup of fruit or vegetable, or a combination, as part of a reimbursable meal under Offer versus Serve. If Offer versus Serve is not selected, students must receive all components and quantities specified for each grade group (daily minimums and servings not exceeding weekly maximums). The ½ cup allowance for fruit or vegetables may be used only once for either the fruits or the vegetables component in a lunch where a student is selecting 3 components and one of those components are

a fruit and vegetable. The student must take the minimum requirements of either the fruit or the vegetable. Here are some examples:

- K-5 student selects $\frac{1}{2}$ cup of peaches (the minimum requirement for the fruit component for this grade grouping), a lettuce salad and a cup of milk. The student selects a full serving of the fruit component and a full serving of the milk component for the K-5 meal pattern. Given these selections, the $\frac{1}{2}$ cup allowance only applies to the vegetable component. The student must select at least $\frac{1}{2}$ cup of the vegetable component (1 cup of uncooked leafy greens = $\frac{1}{2}$ cup creditable vegetable) but must take the $\frac{3}{4}$ cup minimum daily vegetable requirement (1- $\frac{1}{2}$ cups of uncooked leafy greens = $\frac{3}{4}$ cup creditable vegetable).
- The grade 9-12 meal pattern requires students to be offered 1 cup of fruit and 1 cup of vegetable. A student in this grade group must select either the minimum required serving of fruit or the vegetable (2 cups of leafy uncooked greens = 1 cup vegetable) if $\frac{1}{2}$ cup of peaches is on the tray. The $\frac{1}{2}$ cup allowance applies only to the fruit or vegetable component.

Keep in mind that: (1) Fruits and vegetables are separate components in the lunch meal pattern. (2) Students in each grade grouping must be offered the required minimal requirements for these two lunch components. (3) Under Offer versus Serve students must take a total of $\frac{1}{2}$ cup of ANY fruits and/or vegetables. (4) The $\frac{1}{2}$ cup allowance for fruit or vegetables may be used only once for either the fruits or the vegetables component in a lunch when students are selecting 3 components and two of the components are fruit and vegetable. The student must take the minimum requirements of either the fruit or the vegetable.

2. If two different vegetables are offered, one at $\frac{1}{4}$ cup and one at $\frac{1}{2}$ cup, is a student's lunch reimbursable if only $\frac{1}{4}$ cup of vegetables is selected?

It is assumed that this example is for students in grades K-5 or 6-8 and these students may select both vegetable sources. Students must always be offered the required daily minimum amounts of fruits and vegetables. For vegetables, the required daily minimum amounts for lunch are $\frac{3}{4}$ cup for grades K-5 and for 6-8. One cup is the required daily minimum amount for grades 9-12. Fruit is a separate component of the new meal pattern. Under Offer versus Serve, a student must select at least $\frac{1}{2}$ cup of fruits and/or vegetables in order to claim the lunch for reimbursement. In the example, if the student selects at least $\frac{1}{4}$ cup of the planned fruit component and $\frac{1}{4}$ cup of vegetables, this lunch would be considered reimbursable under Offer versus Serve. If the student did not select any fruit, this lunch could not be claimed since the student did not select at least $\frac{1}{2}$ cup of fruits and/or vegetables.

3. If a child takes $\frac{1}{2}$ cup vegetable, no fruit, and two other full food components (such as milk, grains, or meat/meat alternate), does this selection qualify as a reimbursable lunch?

Yes. As explained in the response to question #1 of this section of the Q& A, if the school has Offer versus Serve the student must take 3 of 5 food components to obtain a reimbursable meal. The serving size must be consistent with how the menu planner intends to meet meal pattern requirements for the different grade groupings. A total of $\frac{1}{2}$ cup of any fruits and/or vegetables must be selected.

- 4. Can you use a partial serving of fruit and a partial serving of vegetable to equal ½ cup? For example, 1/8 cup + 1/8 cup for two available fruits plus 1/8 cup = 1/8 cup of two vegetable offerings equals ½ cup.**

Yes, under Offer versus Serve the student must select at least ½ cup of any vegetables or fruits to receive a reimbursable lunch. Review the response to question #1 in this section about the ½ cup allowance when students are selecting 3 components and two of the components are fruit and vegetable.

- 5. If the planned portion is ½ cup fruit and the student doesn't take the full portion, can the smaller portion size still count towards the total ½ cup of fruit and/or vegetable for OVS?**

Yes. It is assumed that this example is for grades K-5 or grades 6-8. At least ⅛ cup must be selected of the fruit to count it towards the ½ cup fruit/vegetable. To be considered a reimbursable meal, students must select a total of ½ cup of fruit and/or vegetable. The minimum portion size for the fruit or vegetable is 1/8 cup. Please review the answer to question 1 in this section of the Q&A which states what a student must select if choosing the fruit, vegetable and one other lunch component.

- 6. If ½ cup spoodle of peas and ½ cup spoodle of peaches is planned, and the student takes ¼ cup of both items, would this be reimbursable lunch under Offer versus Serve?**

NO. It appears that the minimum daily requirements for the fruit and vegetable were not met with ½ cup portions. The daily lunch menu must be planned to provide the minimum serving of the fruit and the vegetable components. In this example, the ½ cup of peas planned as the vegetable is not sufficient for students in the K-5, 6-8 and for the grade 9-12 grouping. An additional ¼ cup of vegetable must be planned for students in grade K-5 and grades 6-8. An additional ½ cup of vegetables and ½ cup of fruit must be planned for students in grades 9-12. Review the answer to question number 1 in this section of the Q&A.

- 7. If I offer ½ cup of peaches and ½ cup of corn, can the student turn down the corn and take 1 cup of peaches?**

In this example, the student turned down the corn (vegetable), but took a cup of peaches (fruit) so the lunch is reimbursable assuming that the selected lunch also included the minimum daily required serving of two other lunch components (meat/meat alternate, grains, and/or milk). As in the example in question #6 of this section of the Q&A, the menu must be planned to meet the minimum daily requirements for fruit and vegetable. The portion sizes stated in the example do not appear to be adequate because no other vegetable sources are mentioned. Additional vegetables must be available for selection for all grade groupings and students in grades 9-12 must have an opportunity to take 1 full cup of fruit.

- 8. What are the minimum portion size requirements for a reimbursable lunch if a student selects the fruit, vegetable and milk components the lunch under Offer versus Serve?**

The student must select 1 cup of fluid low-fat or fat-free milk, a full component of either the fruit or vegetable, and an additional ½ cup of a fruit or a vegetable. Here is an example for grades 9-12: an 8 ounce carton of skim-chocolate fat free milk, 1 cup of broccoli, and ½ cup of peaches. See the answer to question #1 in this section of the Q&A.

9. If you need 3 out of 5 components, would ½ cup fruit and ½ cup vegetable and 1 cup low fat or no fat fluid milk count as a meal for grades K-5?

Yes. A student must take the minimum serving of either a fruit or a vegetable. For grade K-5, ½ cup fruit is the minimum requirement so the ½ cup vegetable with the cup of milk is a reimbursable lunch under the new lunch pattern.

10. Grades 9-12 must have ½ cup of vegetable offered to them so it is okay if they take only ½ cup?

NO. A total of one cup of vegetables from one or more sources MUST be planned for grade 9-12. Under Offer versus Serve the daily minimum serving must be offered but a student may choose to take less depending on the lunch component selections. See the response to question #1 in this section of the Q&A.

11. Are students allowed to select ¼ cup fruit and ¼ cup vegetable to meet the ½ cup fruit or vegetable required for a reimbursable lunch under Offer versus Serve?

Yes. Under Offer versus Serve, a student must select at least ½ cup of fruits and/or vegetables to receive a reimbursable. As explained in the response to question #1 of this section of the Q&A, the ½ cup allowance for fruit or vegetables may be used only once for either the fruits or the vegetables component in a lunch where a student is selecting 3 components and two of those components are fruit and vegetable.

12. If the planned portion of a fruit or vegetable is ¼ cup, could students take two servings of the same fruit or vegetable to equal the ½ cup serving of fruit or vegetable to meet the requirement for a reimbursable meal?

Yes. Under Offer versus Serve students only need to take a total of ½ cup of ANY fruits and/or vegetables. Carefully review the additional stipulations under question #1 in this section of the Q&A.

The following menu was planned for the K-5 grade group with Offer versus Serve. Refer to this chart for question #13.

Food Item	K-5	Comments
Turkey w/gravy	2 oz. creditable meat/meat alternate	3.75 ounce serving of deli turkey = 2 oz. meat/meat alternate, per USDA Foods manufacturer's specifications
Whipped potatoes	¼ cup	¼ cup potatoes + ¼ cup peas = ½ cup starchy vegetable subgroup
Sweet peas	¼ cup	
Sweet potatoes or Steamed carrots	¼ cup	¼ cup of sweet potatoes or carrots = ¼ cup red/orange subgroup
Fresh orange slices	½ cup	½ cup daily requirement for fruit component
Whole grain roll	1 each	1 ounce roll = 1 grains
Milk	1 Cup	

13. If a student selects the planned serving of turkey and gravy, ¼ cup whipped potatoes and milk, is the lunch reimbursable under Offer versus Serve?

No, the student must select at least ½ cup of vegetable and/or fruit.

The following menu was planned for the K-5 grade group with Offer versus Serve. Refer to this chart for questions #14 and #15.

Food Item	K-5	Comments
Cheesy broccoli soup	1 cup	According to soup recipe, 1 cup of soup provides 1 oz of meat/meat alternate and ¼ cup broccoli per serving <ul style="list-style-type: none"> • minimum daily quantity for K-5 • 8-9 oz Meat/Meat Alternate must be planned to meet weekly requirements ¼ cup broccoli is ¼ cup dark green vegetable subgroup
Whole grain bread & Saltine crackers	1-1/4 oz. equivalent	1 ounce slice bread plus 1 package crackers (2 crackers per package)
Chilled pears	½ cup	½ cup daily requirement for fruit component
Romaine lettuce	½ cup	¼ cup = ⅛ cup creditable vegetable= ⅛ cup dark green vegetable subgroup
Baby carrots	½ cup	cup = ½ cup red/orange vegetable subgroup
Milk	1 cup	

14. A student selects 1 cup of soup, bread slice and chooses only 1/4 cup of romaine lettuce. Is that sufficient quantity of fruits and/or vegetable for a reimbursable lunch under Offer versus Serve?

No, only 3/8 cup of creditable vegetable has been selected. The cup of soup contains ¼ cup of broccoli but ¼ cup romaine lettuce credits as ⅛ cup vegetable. Remember that leafy greens credits as ½ of the total volume.

15. A student selects 1 cup cheesy broccoli soup, ½ cup of pears and a bread slice. Is this are reimbursable meal?

Yes. The grade K-5 student has selected the planned serving of three lunch components (1) 1 ounce planned serving of meat/meat alternate from the 1 cup serving of soup (2) bread slice (3) ½ cup fruit.

16. May schools implement Offer versus Serve on some days but not on other days?

No, Offer versus Serve must be implemented each day when this option is selected on Schedule A of the annual on-line contract for all students within a school. However, the on-line contract system does allow a school to specify different options within a school for certain grades. This provision allows a school to implement Offer versus Serve for some grades but require students in other specified grades to take all five required items at lunch.

17. May school agencies with pre-packed system choose not to implement Offer versus Serve?

Offer versus Serve is required in the National School Lunch Program for students in grades 9-12. The school agency may decide to implement Offer versus Serve for students in grades 8 and below. If Offer versus Serve is not selected, students must receive all components and quantities specified for each grade group (daily minimums and servings not exceeding weekly maximums). School agencies are encouraged to modify their meal service system to include Offer versus Serve opportunities to the extent possible.

18. Must the school agency prepare full servings of the planned fruit and the planned vegetables for every student when Offer versus Serve is in place?

According to USDA guidance, school agencies must plan meal to meet all meal requirements. However, menu planners are encouraged to take into account selection trends to determine how much food to prepare when students can turn down items due to Offer versus Serve. Refer to the detailed daily production plans to obtain this information. Careful menu planning will ensure that students have the opportunity to select the planned portion size from the required meal components and minimize costly over production.

19. Must school agency prepare full servings of the vegetable subgroups or can production be based on selection trends to minimize over production and waste?

As stated in question 18 in this section of the Q&A, USDA guidance allows menu planners to base production on selection trends. Appropriate menu substitutions must be available in the event that one or more serving line runs out of required components during meal service. All students must have the opportunity to select minimum servings of all required components.

20. The menu planner plans a hamburger patty provides 2 oz. of creditable meat/meat alternate and counts as 2 oz. meat/meat alternate towards the weekly minimum/maximum requirements. Would a K-5 or 6-8 grade student be required to take the full portion of the hamburger patty to count it as a meat/meat alternate component under Offer versus Serve even though the minimum daily requirement for the K-5 and 6-8 grade group is 1 oz. meat/meat alternate?

Yes. The menu planner determines in advance how the daily minimum requirement and the weekly maximum meat/meat alternate ranges are met. The daily minimum requirement for students in grade K-5 and students and grade 6-8 is 1 ounce equivalent of the meat/meat alternate. However, at least 8 ounce equivalents of meat/meat alternate must be planned for students in grades K-5 but not to exceed 9 ounces over the week. For grade 6-8, at least 8 ounce equivalents meat/meat alternate must be planned with the maximum set at 10 per week. If the menu planner establishes 2 ounce equivalent as the serving size because there are other days during the week that only one ounce of meat/meat alternate is planned, then students must take the full patty to count the meat/meat alternate as a food component under Offer versus Serve.

21. Is it okay to put food on students' trays even if they don't want it under Offer vs. Serve?

The school agency cannot claim lunches when students do not make appropriate selections. A decision may be made to deduct non-reimbursable meals from the claim which means adjusting the count based on the eligibility categories. Consider providing students with assistance with making appropriate selections rather than putting food on the tray. Implement strategies that will not slow down the serving line and/or require student to go back through the serving line. Some schools have a basket at the cashier/computer station located at the end of serving line that contain pre-portioned, shelf stable items such as bagged baby carrots, applesauce cups and/or fresh fruit. As a convenience, some school place a portable insulated milk barrel near the end of the line so students can select milk without having to go back through the line if student forgot to take milk and/or appropriate selections are not made.

22. Can you keep a basket of fresh fruit at point of service for students who are missing the fruit and/or vegetable component?

Absolutely, this is a good strategy to consider for students who fail to make the appropriate selections in the lunch line. Refer to question #21 in this section of the Q&A for other strategies.

USDA Foods:

1. Does the Smuckers 2.5 oz. uncrustable count as a grain and meat/meat alternate?

According to the product formulation statement, the Smuckers Peanut Butter & Jelly Sandwich with Soy on whole grain bread (C453), a sandwich provides 1 ounce meat/meat alternate and 1.25 grains/breads servings. “Unbleached whole wheat flour” is the first ingredient on the product list for the bread in the sandwich so it is whole grain enriched. The crediting for the bread portion of the sandwich will be revised based on the new criteria for the school lunch and school breakfast program.

Production Records:

1. Are there any production record templates available that list the sub-groups?

Yes, two daily production records (worksheets) templates available on the DPI School Nutrition Team website: (1) Detailed production sheet based on Florida’s Department of Agriculture and Consumer Services (2) A simplified version developed by the Kansas Department of Education. These two templates are posted under the “Menu Planning Assistance” section at:

http://fns.dpi.wi.gov/fns_menupln#pr.

2. The school had heard that we will need separate production records for the K-5 and 6-8 groups. If we follow the meal pattern that incorporates both age groups and all the necessary nutritional requirements, can we use one production record as long as both age groups are recorded on the sheet?

Yes, you may record multiple groups on one production record sheet. However, you need to clearly note what portions are for K-5 versus 6-8. It is also recommended to list leftovers by grade grouping to assist with future forecasting, but this is not required.

3. Will production records need to display the contributions of each item and how they fit into the weekly goals?

Yes, the production records must show the contributions of each menu item. In some instances, reference may be made to the standardized recipes. Remember to keep Child Nutrition (CN) labels and product formulations statements as support documentation.

4. Could I fill out the excel document that you demonstrated (Menu Certification Worksheet) for all students for every week and post the corresponding weekly report showing each item and their contribution in place of production records?

No, schools must keep daily production records to show what was planned, available and leftover. However, the Menu Certification Workbook may be used to demonstrate that daily and weekly requirements were met and it is a good menu planning tool.

5. How do I record separate waste on K-5 production records and 6-8 production records when I serve K-8 out of order? I know what is leftover at the end of the day,

but since the grades are not in order, I don't know exactly what is left per grade groupings.

It is not required to separate leftovers by grade grouping but it is recommended as this is helpful for future planning. Please see question 1 in the age/ grade group section of this Q&A for the for grade K-8 meal pattern.

Special Diets:

1. If a parent requests whole milk because a child needs extra calories, can you give whole milk?

No. Whole milk is not allowable in the NSLP or SBP. The only exception may be in the case of a disability. Documentation with accompanying information must be provided by a recognized medical authority for these requests.

Please Note: USDA regulations 7 CFR Part 15b REQUIRE substitutions or modifications in school meals for children whose disabilities restrict their diets. A child with a disability must be provided substitutions in foods when that need is supported by a statement signed by a licensed physician. The physician's statement must identify: the child's disability; provide an explanation of why the disability restricts the child's diet; the major life activity affected by the disability; the food or foods to be omitted from the child's diet, and the foods that must be substituted.

2. Can you serve juice in place of soy or lactose free milk?

Juice cannot be offered as a fluid milk substitute for students when their special dietary are not defined as a disability per a signed physician statement. School Food Authorities (SFAs) participating in the National School Lunch Program and School Breakfast Program have the option to offer a nondairy milk substitute to a student with a medical or special dietary need other than a disability. The final rule *Fluid Milk Substitutions in the School Nutrition Programs* (73 FR 52903, September 12, 2008) addresses the substitution of fluid milk for children whose optional non-disabling allergies, culture, religion, or ethical beliefs preclude the consumption of cow's milk. The final rule sets nutrition standards for the nondairy milk substitutes that may be offered as part of the reimbursable meal. For further information, access USDA's Q&As: Milk Substitution for Children with Medical or Special Dietary Needs (Non-Disability) at: http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2009/SP_35-2009_os.pdf.

3. What are "optional" accommodations for special dietary needs?

Optional accommodations may be made for non life threatening allergies, food intolerances and for cultural, religion or ethical beliefs. Although USDA regulations allow school food authorities to make decisions on a case by case basis, consideration may be given to developing a uniform policy for similar optional accommodations so that all students are treated equally. Review information and resources provided in the response to question #1 and #2 above for further guidance.

4. Do gluten free students (or students with special dietary needs) have to follow the calorie limits (or new meal pattern)?

If a student on a gluten-free diet because of a disability and the accommodations impact the calories and sat fat, the SFA would still be in compliance. To the fullest extent possible, the SFA should meet the dietary specifications for children with disabilities. In all other cases, school must

meet the new dietary specifications. The meals for children with recognized medical disabilities that restrict their diet are not affected by the new meal patterns and dietary specifications. Continue to follow the medical statement received from a licensed physician that lists the food or foods to be omitted from the child's diet and the foods that must be substituted. Optional accommodations for children with special dietary needs (without recognized medical disabilities), as described in the answer to question #3 of this Q&A, must be consistent with the new meal patterns and dietary specifications. Reference: question #5 on page 4 of USDA's SP 10-2012: Third Revision (July 12, 2012) Questions & Answers on the Final Rule, "Nutrition Standards in the National School Lunch and School Breakfast Programs", posted at: http://fns.dpi.wi.gov/fns_cnrsnp#ns.

MEAL IDENTIFICATION

- 1. We now have to identify the meal components of a reimbursable meal on our serving lines. Do we need to identify how each day's menu meets the components by listing the daily menu items or can we just generically identify what meal components constitute a reimbursable meal?**

The foods that are a part of the reimbursable meal must be labeled, listed, or otherwise identified near/at the beginning of the serving line and prior to the point of service so the students can easily choose a reimbursable meal. Generically identifying meat/meat alternate, grain, fruit, vegetable, and milk as the meal components in a reimbursable meal without showing which food items on the daily menu contain those components would not meet the intent of the regulation. For further information refer to question #1-3 on pages 37-386 of USDA's SP 10-2012: Third Revision (July 12, 2012) Questions & Answers on the Final Rule, "Nutrition Standards in the National School Lunch and School Breakfast Programs", posted at: http://fns.dpi.wi.gov/fns_cnrsnp#ns.

- 2. When is the due date for posting what the menu items are that make up a reimbursable meal? This must be posted where and does it have to be changed daily? How do you do this so that all ages can know what's being offered (i.e., kindergarten)?**

Beginning July 1, 2012 (School Year 2012–2013), schools must post the components of the reimbursable meal and appropriate quantities at or near the beginning of the serving line(s) each day. The final rule does not set specific requirements for the posting. School Food Authorities (SFAs) have discretion when determining the best way to present this information on the serving line. For younger students, pictures of menu items may be helpful. Another option is colored stickers that correspond with the various components (red is the meat/meat alternate) and how the components are displayed on the serving line. See the examples of what state agencies and school food authorities shared on USDA's Team Nutrition website at:

<http://healthymeals.nal.usda.gov/best-practices/search/914%2C913%2C894%2C898>. The Iowa Team Nutrition has developed this reimbursable meal identification kit to assist students in selecting their meal choices at/near or beginning of the serving line. It is featured on the Team Nutrition website and is located at: <http://healthymeals.nal.usda.gov/build-healthy-lunch-reimbursable-meal-identification-system-0>

Visuals such as a school lunch tray or MyPlate poster may be used for the background of the display. Downloadable MyPlate graphics are posted at: <http://www.choosemyplate.gov/print-materials-ordering/graphic-resources.html>.

3. Do we have to hire someone to read the menu/meal to the Pre-K and K classes?

Schools are required to identify the foods that are part of the reimbursable meal near or at the beginning of the serving line. As stated under questions #1 in this section of the Q&A, School Food Authorities (SFAs) decide how best to identify the food items and portions sizes that make up a reimbursable meal, as approaches may vary depending on set up of the serving line and number of the serving areas, ages of children, facilities etc. Posting suggestions are describe in question 2 of this section.

MENU CERTIFICATION (SIX CENTS)

General:

1. We received our notification about renewing the school contract and one of the new sections says that we will be ask if we are going to apply for the additional 6 cents reimbursement and that we should check yes or no if we plan to comply. Do I misunderstand that we have an option to comply with the new meal pattern?

Effective July 1, 2012, all School Food Authorities (SFAs) participating in the National School Lunch Program must COMPLY with the new nutrition standards and meal pattern requirements. However, to receive the additional 6 cent reimbursement per lunch, SFAs must APPLY by submitting completed USDA designed Excel workbooks, nutrient analysis or simplified nutrient assessment, and attestation statement to DPI's School Nutrition Team. The information is submitted electronically by the SFA. The SFA is approved for the additional 6 cents if it is determined that school is in compliance with the meal pattern requirements and the dietary specifications for calories and saturated fat.

2. After we are certified, is there anything monthly we need to do?

Certification is a one-time process. However, when School Food Authorities (SFAs) that complete the attestation portion of the certification process agree to comply with the new meal pattern requirements and the dietary specifications on a continuous basis plus support compliance with properly completed production records. Production records include daily production plans, updated recipes, Child Nutrition labels, product formulation statements and standardized recipes.

3. How long does this 6¢ incentive go for?

This 6¢ per lunch is additional federal reimbursement that school food authorities will continue to receive as long as they remain compliant with the meal pattern requirements and dietary specifications. Refer to question 1 on page 4 of USDA's *Questions and Answers Related to the Certification of Compliance with Meal Requirements for the National School Lunch Program*, SP 31-2012: Second Revision. It contains information pertaining to how the annual meal program reimbursement and extra reimbursement are adjusted annually. This memo is posted at http://fns.dpi.wi.gov/fns_6centscert.

4. Do we have to apply for certification every year?

No. See question #3 in this section of the Q &A. A second reference is question 8 on page 2 of USDA's *Questions and Answers Related to the Certification of Compliance with Meal Requirements for the National School Lunch Program*, SP 31-2012, July 16, 2012: Second Revision. State agencies must certify a School Food Authority (SFAs) only once. Once certification is granted, ongoing compliance with meal pattern requirements will be monitored

through administrative reviews. The only exception to this one-time certification is if the state agency is unable to confirm SFA compliance during an on-site validation review. These reviews are only conducted during School Year 2012-13. If the extra six cents is turned off due to non-compliance findings during the validation review, the school food authority must reapply for certification.

5. When should the workbook be submitted in order to be eligible to receive the additional 6 cent reimbursement starting on October 1st?

To be eligible to receive the 6 cent reimbursement starting on October 1st, the workbook(s) for one week of menus planned for October 2012 and attestation must be submitted to DPI's School Nutrition Team for approval no later than November 30, 2012. School food authorities (SFAs) are encouraged to submit certification documentation as early as possible in order to receive this additional performance-based reimbursement in a timely manner for all lunches served on or after October 1, 2012. Here are the timelines SFAs must adhere to when submitting the workbook(s) and attestation:

- Submissions between July 1, 2012 and September 30, 2012: Completed workbook(s) for a week of PLANNED breakfast (if applicable) and one week of PLANNED lunch menus that will be served in October or November, 2012.
- Submission during the month of October 2012: Completed workbook(s) must be for a week of breakfast (if applicable) and lunch menus PLANNED OR SERVED in October 2012.
- Submission November 1, 2012 or later: Completed workbook(s) must be for a week of breakfast (if applicable) and lunch menus PLANNED OR SERVED in the month of submission or the preceding month (i.e., workbooks submitted in January must be for menus served in either January or December).

6. If a school submits certification on January 10th, can it be for a future week in January, for example the week of January 20th? Does the rule state that it has to be a "past or offered" menu for the month they are submitting or can it still be "planned"?

If a school food authority (SFA) submits documentation for certification on January 10, 2013, the documentation must reflect a week of menus PLANNED OR SERVED in either January 2013 or December 2012. Yes, SFAs may submit menus reflecting planned menus for the week of January 20th. Menus for February would not be acceptable for a January 10th submission date.

7. What if you start to complete the menu worksheets in October, but don't complete and submit them until December?

If you submit the workbook in December, the workbook must be completed for a week during December or for a week in the preceding calendar month which is November. Submit the completed workbooks to meet the time lines so the School Food Authority can start receiving the extra 6 cent lunch reimbursement for all lunches served to students as soon as possible.

8. If certification is completed during an on-site administrative review, does the extra 6¢ reimbursement go back to October 1?

The six cents goes back to the first of the month for the menu that is reviewed. Not unless the review period for the administrative review is October and the School Food Authority (SFA) is certified before November 30th. As previously stated in this section of the Q & A, the 6¢ reimbursement is only retroactive back to the first day of the month that the SFA is certified for.

- 9. For new schools coming into the program, the July 16, 2012 revised Q&A added Q19, page 5, saying that new SFAs would need to submit certification documentation prior to their participation. Does this mean that their certification documentation would be for planned menus for the first month they anticipate participation in the program?**

Yes, in this situation the certification would be for PLANNED menus the first month they anticipate participation in the program.

- 10. We are a satellite school that purchases meals from another SFA or vendor so we do not plan menus. Do we have to do this or can the vendor just submit documentation for all schools purchasing from them?**

Each School Food Authority (SFA) must apply for certification by submitting completed workbook(s) and the attestation. The vendor or another SFA that sells meals to a school may help with completing some of the information required, but each SFA under contract with DPI to participate in the school lunch program must apply by submitting the workbook(s) and attestation. The workbooks and additional information about the certification process is posted at:

http://fns.dpi.wi.gov/fns_6centscert.

- 11. As a vendor or school selling meals to other schools, may I complete the workbook once and submit under these 5 contracted K-8 schools?**

No. Complete the workbook for the K-8 once and save it under different names specific to each of the School Food Authorities (SFA) that are under contract with DPI to participate in the school nutrition programs. Each workbook that is completed by the menu planner and/or others associated with the SFA must reflect any customizing done for the different schools (i.e. milk type usage, condiment usage, alternate entrees or sides, etc). Each individual SFA must upload their customized K-8 OR K-5 and 6-8 workbooks following the DPI web application instructions. The designated authorized representative for each of the SFAs is held accountable to DPI for administrating the school nutrition programs so this person must submit the workbook(s), simplified nutrient assessment or nutrient analysis and the attestation.

- 12. Can we just mail in the information like we did in the past for the School Meals Initiative (SMI) nutrient analysis?**

No. School Food Authorities (SFAs) must submit the USDA designed workbooks, nutrient analysis or simplified nutrient assessment and the attestation electronically per instructions provided by DPI's School Nutrition Team.

- 13. Do I have to submit documentation for certification if documentation was submitted during the 2011-2012 school year?**

Yes, the workbook(s), nutrient analysis or simplified nutrient assessment and attestation are submitted on-line for the certification process. It is not the same documentation submitted in the School Meals Initiative (SMI) packet. The final rule, Nutrition Standards in the National School Lunch and Breakfast Programs, ends the School Meals Initiative (SMI) reviews previously authorized by federal legislation.

- 14. Do schools that are currently certified as HealthierUS School Challenge (HUSSC) automatically qualify for the additional six cents reimbursement?**

No. Schools recognized with a HUSSC award for their efforts to create healthier school environments through the promotion of nutrition and physical activity do not automatically qualify

for the additional 6 cents. All School Food Authorities must apply for the additional lunch reimbursement via the menu certification process. However, the HUSSC has helped schools get on board with the new requirements.

15. If the hamburger bun we currently use weighs 52 grams, which is not meeting the 2 oz. equivalency requirement, would serving this hinder us from getting the 6¢?

School Food Authorities (SFAs) must demonstrate compliance with those meal pattern requirements in effect at the time the SFA applies for certification. Menu planners have flexibility when crediting all grains sources, including baked goods for the 2012-13 school year. Schools may continue to credit baked goods such as buns based on the current 14.75 grams of grains per serving (Exhibit A on pages 3-15 and 3-16 of USDA's *Food Buying Guide*). All baked good products must be credited based 16 grams of grains per ounce equivalent (oz eq) beginning on July 1, 2013, the beginning of School Year 2013-14. For school year 2012-13, a 52 gram hamburger bun may count as two grains/breads ($52 \div 25 = 2.08$ rounded down to the nearest $\frac{1}{4}$ grains/bread servings = 2 oz eq). Refer to the information provided in the grains section of this Q&A.

16. Do we use planned or actual quantities for nutrient analysis/Simplified Nutrient Assessment for certification? What about schools that have food courts or multiple lines?

For certification workbook(s) submitted between the dates of July 1 and September 30, 2012, use planned quantities for the selected week in October or November 2012. For any workbook(s) submitted October 1, 2012 or later, use **offered** quantities (reflecting substitutions or other changes made to the menus). See question #17 in this section of the Q&A for further information. Similarly, with multiple lines or food courts, the analyses are based on planned (or offered if already served), not on actual usage.

17. What happens if we have to make a substitution and the menu does not match production?

If you submit workbook(s) on July 1 through September 30, 2012 and the information is based on what is planned, it is expected that the menu was served. DPI realizes that substitutions are necessary at times but it should match planned production as closely as possible. If you are submitting a menu on October 1, 2012 or later, any substitutions made to the plan menu must be included when completing the workbook(s) because information is based on what was offered.

18. Could an SFA use different options when submitting documentation for certification (i.e., for the elementary school, use option 1, submitting menu worksheets and simplified nutrient assessment; and then for the middle and high school, complete the menu worksheets and submit a school-conducted nutrient analysis conducted on USDA approved software)?

Yes, but all workbook(s) for a school food authority (SFA) must be submitted at one time.

19. Does the workbook have to be completed all at one time?

Yes. However, the menu planner can work on the workbook(s) at his/her convenience prior to submission. Click on the pertinent workbook(s) and "save" as document(s) using the tool bar feature on the computer. Access the saved document(s) on the computer when working on the workbook(s). Frequently "save" your work during sessions and at the end of each work session. There is no 'time out' feature in the workbook so it may be open as long as needed, even over

several days. Upload all workbook(s) to the DPI web application at one time. Remember that submitted workbooks must be for a week in the current month or the previous month. Therefore, there is a time limit for submitting the workbook to begin receiving the 6 cent reimbursement.

20. If we do not have to include 3 and 4-year-old kindergarten when submitting workbooks, will we still be able to be certified and would we receive the extra 6¢ for the lunches served to this age group?

Yes.

21. Which meal pattern do we use for breakfast for SY 2012-13, if we are applying for certification?

Use the “Breakfast Certification Workbook and Simplified Nutrient Assessment, Grades K-12” posted on DPI School Nutrition Team website located at: http://fns.dpi.wi.gov/fns_6centscert when completing certification. All School Food Authorities MUST follow one of the CURRENT breakfast meal patterns (traditional or the enhanced version of the food based menu planning system or the Nutrient Standard Menu Planning option) during the 2012-13 school year. Each SFA designates what schools will use when completing the annual on-line contract. The only exception is for schools that have been approved to use the new breakfast meal pattern. Refer to USDA’s timeline for phase in of the new meal pattern requirements for the school breakfast program posted at: http://fns.dpi.wi.gov/files/fns/doc/nstl_1_2012.doc.

22. For breakfast at some of our satellite schools, we have cold grab and go items that they can choose – not a specific menu. How do we certify this type of menu?

The grab and go meal is a menu type and you use the production record information when completing the workbook for the certification process. Schools must maintain accurate and complete daily production records for the breakfast program even when students are offered choices and the records must show what is offered, served and leftover.

23. Can a workbook’s information be copied to another?

Yes. Use the directions found in “Instructions for Transferring Data from USDA Certification Tools” posted on DPI School Nutrition Team’s Menu Certification webpage at: http://fns.dpi.wi.gov/files/fns/pdf/sp34_2012_data_trans_dir.pdf. Additional menu certification resources can be found at: http://fns.dpi.wi.gov/fns_6centscert.

24. If we have a combination middle/high school, with grades 6-12, how do we complete the workbook(s)? Can we duplicate the 6-8 in the 9-12?

The school food authority (SFA) must complete a workbook for grades 6-8 and a workbook for grades 9-12. However, information may be transferred from one completed workbook to another using cut and paste methods to minimize data entry. As stated in the previous question in this Q & A, follow the directions found in USDA’s *Instructions for Transferring Data from USDA Certification Tool*. These instructions are posted at: http://fns.dpi.wi.gov/files/fns/pdf/sp34_2012_data_trans_dir.pdf.

Concerns have been expressed to USDA regarding complications that may arise in schools where students do not come through the lunch line by grade, making it difficult to determine or separate information by grade groups as defined in the meal pattern requirements. If you have solutions or best practices, please let DPI School Nutrition Team know so that we can share your ideas with

others USDA also encourages state agencies and School Food Authorities to use the School Meal Pattern Clearinghouse, <http://healthymeals.nal.usda.gov/best-practices>, for sharing information, best practices and ideas.

25. If we are a K-8 school, and we use the 650 Calorie guideline (K-8), can we submit the same menu for K-5 and 6-8?

Yes. Use the K-8 menu certification workbook.

26. Can I use one K-8 workbook to include all of my four elementary schools and one middle school?

If the School Food Authority (SFA) follows the grade K-8 optional menu pattern for all grades and all grades receive the same menu, then yes, use one workbook. However, if any of the schools within the SFA use a different menu or menu type, or if the SFA is following the grade K-5 menu pattern for the elementary schools and the grade 6-8 menu pattern for the middle school, then more workbooks would be required.

27. If we have two schools in our district and they are broken down K-6 and 7-12, which workbooks would we use?

This School Food Authority (SFA) could choose to use the grade K-8 workbook OR the grade K-5 and grade 6-8 workbooks depending on how meals are planned for the grade K-6 school. For the 7-12 grade school, two workbooks would be required, the grade 6-8 workbook and the grade 9-12 workbook.

28. Even though we only have to submit one week of menus, we still need to figure this out for every single thing we serve?

School Food Authorities (SFAs) are required to complete the menu workbooks and either the simplified nutrient assessment included in the workbook OR a nutritional analysis for the one week of menus for the certification process. However, SFAs must document through production records (daily completed production plans, recipes, Child Nutrition Labels, product formulation statements and standardized recipes) that you are meeting the meal pattern requirements for all meals claimed including breakfasts, lunches, and afterschool snacks.

29. Can I use this tool to correct the menu before it is served?

Yes, menu planners are encouraged to use the certification workbooks to determine if planned weekly menus meet the meal pattern and the dietary specifications.

Completing the Menu Worksheets in the Workbooks:

1. Is a second serving of a food component counted towards the maximums?

Yes, second servings contribute towards the maximums for the meat/meat alternate and the grains component and must be included when completing the menu certification workbook. If second servings are sold as a la carte items, the items are not entered on the worksheets in the workbook.

2. On the daily tabs, in the “Vegetable Subgroup” area, how do we record the “Additional Vegetables” to reach total, like mixed vegetables? They don’t fit in one of the other subgroups. Do we add them as an unspecified under “Other Vegetables”?

The total quantity of vegetables planned or offered in cups is entered in the “All Meals” tab when completing the menu worksheet. The vegetable subgroup reporting is a separate step. All vegetables are reported as Dark Green Red/Orange, Beans/Peas, Starchy or Other which accounts for any additional vegetables. The format of the worksheet was designed to determine if the daily and the week minimum vegetable requirements have been met based on what is entered in these two areas. The additional vegetables needed to meet the minimum requirements may come from any of the designated subgroups.

Per instructions for completing the vegetable subgroup reporting section of the menu worksheet, enter the largest amount of vegetables offered to any one student under the vegetable subgroup columns after accessing the tab designated for each day of the week (Monday, Tuesday, etc.). Start with the dark green vegetables and then repeat the process for each of the four subgroups (Red/Orange, Beans/Peas, Starchy and Other). Common vegetables that are categorized as “other vegetable” subgroup are green beans, cauliflower, celery, and iceberg lettuce. Refer to the Vegetable Subgroup Chart on http://fns.dpi.wi.gov/fns_cnrsnp under the “Other Resources” section for a more complete list of vegetables in the subgroups. However, all planned or offered servings of vegetables, except starchy vegetables, may be entered in the “other” subgroup if not reported under another subgroup. For example, if the weekly red/orange subgroup requirement is met with various vegetables from this subgroup, planned/offered servings of carrots may be entered as an “other vegetable” on one or all days.

Mixed vegetable blends count as an “other vegetable” if the exact quantities of the vegetables in a serving are not known. However, if the exact quantities in a serving are known and at least a minimum of 1/8 cup of any one subgroup is provided in a serving, the quantity may be included when determining the largest amount planned or offered for the appropriate subgroup(s). Vegetables blends that include starchy vegetables (example: carrot/corn/green bean/pea blend) ALWAYS count as an “other vegetable.” When entering planned or offered serving size of mixed vegetables for the vegetable reporting section of the menu certification workbook, select “other unspecified” from the dropdown box on the daily tabs.

3. Do you add all vegetables to the second part of the daily tab worksheets? For example, the pizza sauce on pizza? If so, does that mean we have to breakdown all product specifications or use CN labels?

List only vegetables with a serving size of 1/8 cup or larger and that are count towards the vegetable component for the day on the daily tab worksheet. If pizza sauce is not counted towards the vegetable component then there is no need obtain the crediting information that appears on the Child Nutrition (CN) label or the manufacturer’s product formulation statement for the pizza sauce.

4. If you have a “recipe” for a vegetable such as a broccoli salad, or carrot-raisin salad, etc., do you record it as ‘broccoli’ under dark green or under unspecified dark green as ‘broccoli salad’?

Select ‘broccoli’ from the drop down box under dark green vegetables if the largest amount offered to any one student is at least 1/8 cup from the salad mixture.

5. On the daily worksheet under vegetable requirement, will it pre-populate from the Vegetable Bar tab?

No. There is a notation on the “Daily Tab” of the vegetable subgroup reporting section that states: “Check this box if you offered the weekly vegetable bar”. If this box is checked the items entered

on the Vegetable Bar tab will be included for that day on the Weekly Report tab and automatically entered in the Simplified Nutrient Assessment calculations.

6. We have a fruit/vegetable bar with a variety every day, depending on produce cost and availability. When the worksheet asks how much fruit/vegetable is offered how should we enter the information?

Review past production records for that menu or days when similar menus were served and estimate as closely as possible.

7. On the “All Meal” tab, do you only enter contributing food components of each menu item in each row? For example, chicken nuggets only contribute to meat/meat alternate and grains, so you wouldn’t enter fruit/vegetable in that row. If you offer peaches, then you start a new row and enter the amount offered.

All unique reimbursable meals offered over the course of the entire week must be entered – one meal per row on this worksheet. Each row should include all required food components: any grain/meat/meat alternatives in a main and/or side dish, total amount of fruit offered with this meal, total amount of vegetables in a main and/or side dish, and amount of milk.

8. What is the optional vegetable bar tab for in the workbook?

The optional vegetable bar tab was designed for schools that offer a salad or garden bar or the same vegetable side dishes more than once a week. Use this tab ONLY if these vegetable bars are available multiple times during the week with the SAME vegetable subgroup offerings in the same quantities. The salad or garden bar must be accessible to ALL students for the days in which it is offered. Detailed instructions for completing the workbook (including the vegetable bar tab), are posted at DPI School Nutrition Team website at:

http://fns.dpi.wi.gov/files/fns/pdf/sp34_2012_worksht_dir.pdf.

9. Why is jicama listed in the ‘other’ group in the 5 day workbook but is as a ‘starchy’ vegetable in the 4 day and 7 day workbooks?

Jicama was recently classified as starchy vegetable by the USDA Center for Nutrition Policy and Promotion (CNPP). It is correctly categorized in the 4 and 7 day worksheets, but not in the 5 day workbook that was posted before the new categorization information was released. USDA is trying to avoid re-issuing new worksheets, so remember list jicama under an “Unspecified Starchy” vegetable in the 5 day workbooks.

10. In the workbook, why when I make a change on the all meal tab does it not show up on the daily tabs or the weekly report tab?

Click on the “Save” in the tool bar after making revisions and before moving to another tab so that the change registers on the worksheet and updates are made in the other tabs.

Simplified Nutrient Assessment/Nutrient Analysis:

1. Why isn’t sodium calculated on the Simplified Nutrient Assessment? I thought this was part of with the new meal pattern?

Sodium target specifications are not established for the 2012-2013 school year, so levels are not calculated on the assessment. DPI School Nutrition Team encourages menu planners to begin

monitoring sodium levels to prepare for the changes that go into effective at the start of the 2014-2015 school year. Intermediate sodium specifications are established for the 2014-2015 and 2017-2018 school years. Final sodium specifications must be met the 2022-2023 school (July 1, 2022).

2. What software do you recommend for nutritional analysis?

DPI School Nutrition Team cannot recommend, promote or endorse any one product. The link to USDA's list of approved software that may be used for nutrient analysis is posted At DPI School Nutrition Team's website at: http://fns.dpi.wi.gov/fns_6centscert. Remember that there is no requirement to purchase nutrient analysis software for certification but it may be utilized if it was already purchased for the Nutrient Standard Menu Planning System, a previous menu planning system option. The optional USDA simplified nutrition assessment is incorporated into the workbooks that must be completed for certification. To use this option, obtain calorie and saturated fat content of menu items served during the selected week from the nutrition fact labels on products, USDA recipes, product formulation statements and/or the web-based commercially available certification tools approved by USDA. The currently approved USDA certification tools are listed on USDA Team Nutrition webpage at: <http://healthymeals.nal.usda.gov/menu-planning/software-approved-usda-administrative-reviews/list-approved-software%0B-administrative>.

3. Which software is USDA approved for nutrient analysis when using Option 1?

The link to USDA's list of approved software is on DPI School Nutrition Team's Menu Certification webpage at http://fns.dpi.wi.gov/fns_6centscert. As stated in question #1 of this section of the Q&A, School Food Authorities do not need to purchase USDA approved software to complete the menu certification process. There is an optional Simplified Nutrient Assessment in the certified workbooks that may be used instead.

4. Where do you get the USDA tool for simplified nutrient assessment?

As stated in question #1 of this section of the Q&A. The simplified nutrient assessment is a worksheet within the USDA certification workbooks. There is a link to the workbooks on DPI's Menu Certification webpage located at: http://fns.dpi.wi.gov/fns_6centscert. Remember to download the workbook(s) by saving as Excel workbook(s). Access the saved workbook(s) when entering information. Save frequently during each session and at the end of a session.

5. Is one web-based calorie finder tool more "user friendly" than another?

DPI School Nutrition Team has not reviewed or used all the tools. The team recommends that menu planners try those listed on the certification web page to determine what works best. The USDA certification tools are listed on USDA Team Nutrition webpage at: <http://healthymeals.nal.usda.gov/menu-planning/software-approved-usda-administrative-reviews/list-approved-software%0B-administrative>.

6. When sending in a nutrient analysis or simplified nutrient assessment, do we have to send labels, recipes, etc., like we did for SMI?

No. The simplified nutrient assessment is part of the electronic workbook. If chosen for a validation review, that documentation will be looked at while DPI School Nutrition Program Team is on site.

7. If you offer a reimbursable meal on the a la carte line, do you need a nutrient analysis done also and send it with our lunch menu?

A la carte sales are not entered when completing the certification workbooks. However, if students may choose a reimbursable meal on the a la carte line, the information pertaining to this line must be entered.

8. Food Service Management Companies that have their own recipes with nutrition panels, can those be submitted?

The recipe information entered for the simplified nutrient assessment or the nutrient analysis must reflect actual meal preparation for individual schools. If recipes are altered, these customized recipes must be analyzed or assessed. The recipes are not submitted with the workbooks but kept at the production kitchens as documentation.

9. If a school is using a USDA recipe, if there are no major changes, can they use the calories and saturated fat off of the recipe?

Yes, if there are NO changes to major ingredients (does not include spices) this information from the recipe can be used. However, if a USDA recipe is modified in any way (ingredients, ingredient amounts, serving size, etc.) USDA instructions state that calories and saturated fat from all the ingredients in the customized recipe must be calculated by:

- Obtaining information for each ingredient from the product nutrition facts labels, product formulation statements, nutrient reference book and/or any other sources, and commercial web-based tool Three web-based tools are listed on DPI's Menu Certification webpage at: http://fns.dpi.wi.gov/fns_6centscert.
- Adding up the total calories and grams of saturated fat from all ingredients.
- Dividing the total calories grams of saturated fat by the number of servings in the customized recipe.

10. Do Salad Bars count towards the calorie count i.e. do the foods taken from the salad bar get included in the nutrient assessment?

Yes, for more information on how this is done see next question.

11. How do you determine the calories and fat content if we offer a salad bar daily? The students are allowed to "build their own" salad or choose their vegetable, the bar has anywhere from 12-15 items on it-some students take 3 some take it all so how do I figure this into my daily nutritional figures?

As mentioned in the salad bar section of this Q&A, portion sizes must be planned and control measures must be in place with the new menu pattern to meet set minimums and maximums for the various meal components. For more information on portioning and portion control, refer to the USDA's Salad Bars in the National School Lunch Program, Guidance Memorandum SP 02-2010, January 21, 2011, posted on DPI School Nutrition webpage at: http://fns.dpi.wi.gov/fns_menupln. There are no daily or weekly maximums for vegetables. However, 1/4 ounce equivalents of the meat/meat alternate and the grains count towards set maximums. Make appropriate changes for the salad bar to comply with the new menu pattern requirements and determine portion size for the vegetables offered to a student on this bar.

Once adjustments are made on the line, determine the quantity in cups that is offered to a student on the salad bar plus any other available vegetable offerings in column 5, "Vegetables" area of the "All Meals" worksheet when completing the menu certification workbook. This portion of the

worksheet was designed to populate the calories and saturated fat for the vegetables in the simplified nutrient assessment based on the items, portion sizes and number of portion entered in the vegetable column. The vegetable are not entered in the “Dessert, Sides, or Condiments” area of the worksheet. However, condiments, non-vegetables and the mixed side dishes (items on the salad bar that contain added grains (if less than ¼ ounce equivalent) or meat/meat alternates (if less than ¼ ounce equivalent) must be entered in the “Dessert, Sides, or Condiments” area of the worksheet.

To simplify the data entry, consider utilizing the “Optional VegBar” tab feature and enter the vegetable amounts in the subgroups that are served every day on the salad bar. Note that this tab is for vegetable bars offered for the week or certain days in the week with the SAME vegetable subgroup offerings. Click on the appropriate boxes in the individual day tabs where the instruction state: “Check this box if you offered the weekly vegetable bar on ___day with NO CHANGES”. The calories and saturated fat from the vegetables will be populated in the Simplified Nutrient Assessment totals. The vegetables not served everyday are entered as vegetables on the daily tabs. Condiments, meat/meat alternates, grains, and the mixed side dishes that contain grains or meat/meat alternates are entered as “Dessert, Sides, or Condiments” in the simplified nutrient assessment.

12. Why is stick margarine listed as a condiment on the simplified nutrient assessment worksheet from USDA? I thought that there were no trans-fats allowed.

In the simplified nutrient assessment worksheet, USDA provides calories and saturated fat values for commonly used condiments to assist schools with this information. Within the grid of condiments, it lists margarine (but it does not specify stick margarine). The menu planner is responsible for monitoring labels to ensure that food items used in meal preparation do not contain trans fats.

13. Do condiments need to be pre-portioned?

No, condiments do not need to be pre-portioned but the planned portion must be determined for the simplified nutrient assessment.

14. What are the nutritional maximums for condiments?

There are no specified maximums portion sizes for condiments, but condiment usage is taken into account when determining total calories and the saturated fat content of lunches for the certification process. Sodium levels will be assessed when the dietary specification go into effect. See question #1 in this section of the Q&A.

15. In the elementary schools where we cannot monitor condiment usage perfectly we have some questions. Our understanding is that we would need to count out each individual package of: ranch, ketchup, mayo etc. so that we can better plan for the nutrient analysis. Our question is how in-depth or specific does it need to be. Does our staff need to manual count everything (as we only use packets) or can we do this for a week at each school and average it and use this amount for the nutrition within NutriKids. Right now we do an average in NutriKids of 1 package per child typically. Please clarify what is expected.

For the analysis that is submitted with the menu certification process, you enter condiment usage based on what is OFFERED to students. When one packet of salad dressing is offered for each salad, then enter one packet that will accompany a salad for the analysis. However, if the one

pound of diced fresh tomatoes offered when you serve burritos is less than 1/8 cup serving per student, the tomatoes are entered as a condiment. In this case include one pound of tomatoes in the condiment usage for that day or the week.

16. We are going to be serving a “Taco Dip” which is 1/2 c refried beans with a little taco sauce added to thin them out, shredded lettuce, shredded cheese and diced tomatoes. Does this need to be entered into the Dessert, Side or Condiment Area?

It really depends on how you are crediting and entering the ingredients in the taco dip. If the serving of refried beans in the taco dip is entered as counting towards the beans/peas (legume) vegetable subgroup or a meat/meat alternate, then these dip ingredients are not entered in the “Dessert, Sides, or Condiments” area for the simplified nutrient assessment portion of the workbook. If dip ingredients are not credited as meal components, all dip ingredients are entered in the “Dessert, Sides, or Condiments” area. If the beans in the dip are entered as a meal component but not the cheese, tomatoes and lettuce, then enter these ingredients along with the taco sauce in the “Dessert, Sides, or Condiments” area.

17. If you have on the menu ‘Baked Potato and Toppings’ would you consider the calories in the simplified nutrient assessment to include the potato if you have listed it on the vegetable sub group serving? The Potato is an ingredient of the main dish but would you include it on the vegetable sub groups? Ham, cheese sauce, and sour cream are served with the potato, how are these included?

Follow the detailed instructions provided in the direction for menu worksheets. Enter the potato bar as one of the unique reimbursable meal offered during the week in column 1, “Meal Name” on the “All Meals” tab. Report the serving size of the potato as a starchy vegetable. Include the potato and all of the toppings in the “Main Dish Reporting” when entering simplified nutrient data. Therefore, all of the calories and saturated fat would be calculated and would not have to be entered in the “Dessert, Sides, or Condiments” area of the simplified nutrient data. The directions are posted at: http://fns.dpi.wi.gov/fns_6centscert. However, if the SFA wishes to count the potato as one of the vegetables, they would enter it as a vegetable. There may be some double counting of calories and this could be noted in the SFA notes section.

Attestation:

1. Will there be an attestation document that we must sign off on?

No. The attestation will be done electronically by clicking on a box prior to submitting the meal certification workbook to DPI’s School Nutrition Team. It is similar to the on-line contract submission process.

2. Please clarify who is the person required to sign the attestation?

The person designated on the annual on-line contract as the authorized representative must give permission to click on the attestation statement. The authorized representative is the person held responsible for administering the programs in accordance with federal regulations. Access the on-line contract to determine who has been designated as the authorized representative.

Validation Reviews:

1. If our validation is “turned off” will we need to re-pay any monies?

The decision to “turn off” the additional 6 cents depends on the longevity and severity of the problems found during the validation review. If corrective action can occur immediately, the 6¢ may not have to be turned off. If problems could not be corrected immediately DPI School Nutrition Team, on a case by case basis, will assess whether to stop payment of the extra reimbursement until the problem has been corrected and whether to take back any improperly paid funds.

2. How will DPI determine which SFAs that are certified will receive a validation review?

USDA requires a random selection process.

3. How many and which schools will DPI review during a validation review?

DPI School Nutrition Team must observe meal service for each type of certified menu (each menu type and grade grouping). Production records (daily production plans, Child Nutrition labels, product formulation statements and standardized recipes) must be reviewed for observed meals to ensure the meal service meets the updated meal pattern requirements and is consistent with the documentation submitted for certification. For more information, refer to USDA’s SP 31-2012: Second Revision, Questions and Answers Related to the Certification of Compliance with Meal Requirements for the National School Lunch Program, SP 31-2012, page 9, Question 38 and Question 39. This USDA resource is posted at: http://fns.dpi.wi.gov/fns_6centcert.

PAID LUNCH EQUITY (PLE)

1. Can I just arbitrarily raise lunch prices?

No, all schools MUST run the PLE (Excel) Tool annually to determine if a price increase is necessary. The tool and step by step instructions are located on the website at: http://fns.dpi.wi.gov/fns_cnrsnp#cnrsnplp. This tool is updated annually by USDA.

2. If a price increase is not indicated by the PLE tool does the School Food Authority (SFA) still have the discretion to raise meal prices?

Yes, SFAs can always increase prices more than what is required by the tool.

3. If my lunch prices are over \$2.51, can the school district still increase meal prices?

Yes, same answer as the response to question #2 in this section of the Q&A.

4. If my lunch prices are over \$2.51 do I still have to run the tool?

Yes, all SFAs MUST run the tool. Any amount over \$2.51 will carry over as a credit to be factored into the next year’s lunch price calculation.

5. What is the average price to avoid yearly increases?

There is no average price to stop yearly increases due to how annual lunch price increases are determined each year. The basis for the yearly lunch price increase is 2% plus the inflation factor that varies each year. The inflation factor is based on the Consumer Price Index for all Urban Consumers (CPI). For the 2012-13 school year the inflation factor is 2.18%, for a total of 4.18%

price increase. This inflation factor for school year 2012-13 was published in the July 20, 2011 Federal Register Notice announcing the 2011-12 school year reimbursement rates.

6. What allowable non-federal sources can be used in lieu of raising lunch prices?

For the 2012-13 school year, the only allowable non-federal sources that pertain to Wisconsin are ALL annual state aid breakfast payments and the annual Wisconsin School Day Milk Program state aid payment. In addition, donations received from outside sources that are designated by the donor for food service purposes may be used in lieu of a meal price increase. Refer to the May 30, 2012 memo from June Paul, Director School Nutrition Team clarifying allowable non-federal sources, http://fns.dpi.wi.gov/fns_cnrsnp#cnrsnplp.

7. Can vending machine sales and a la carte sales revenue be used to offset price increase required by PLE? (vending machine and a la carte are outside of school meals).

No. A la carte sales (any food or beverage sold separately from reimbursable meals) or vending machine sales are considered unallowable non-federal funding sources for PLE. For more information, please refer to the DPI memo *Paid Lunch Equity and Revenue from Non-Program Foods* sent on August 12, 2011 on our website http://fns.dpi.wi.gov/files/fns/doc/snt_mail_081211.doc.

8. Can a la carte revenue be used as non-federal funds to cover Paid Lunch Equity?

No. Refer to question # 6 and #7 in this section of the Q&A.

9. How can we justify increased prices and decreased portions (maximums)?

The intent of the PLE is to ensure sufficient funds are provided to the nonprofit school food service account for lunches served to students who are not eligible for free or reduced price meals. The federal reimbursement for paid meals was never meant to cover the full cost of the meal, and the reimbursement provided for free and/or reduced priced meals is intended to cover the cost of those respective meals. The PLE ensures that paid meal costs are covered by charging those students an amount to cover the costs associated with the meal. The new meal pattern requirements place maximums on certain components, while the fruit and vegetable components have more requirements, which may result in an increase in meal production costs.

NONPROGRAM FOODS

1. Can we price healthy a la carte items at a less profitable price than the less healthy items?

Yes. However, the pricing structure established for a la carte items must generate sufficient income to cover all costs associated with these sales. Schools participating in federal meal programs agree to limit use of income received for operation of the federal Child Nutrition Programs when annually contracting with DPI School Nutrition Team. Revenue intended for the federal meal programs cannot be used to subsidize nonprogram activities. Program income includes student and adult meal payments, federal reimbursement, state matching and state aids payments. Complete the annual revenue calculations now required. The link to the “Non-program Food Revenue Tool” is posted on DPI School Nutrition Team’s website at: http://fns.dpi.wi.gov/fns_cnrsnp. If the calculations reveal that proportion of revenue is equal to or greater than the proportion of the food costs, no action is needed. If not, the SFA must review the prices charged for nonprogram foods and make necessary adjustments.

2. If I hold food for booster club sales in my freezer do I need to make a profit on this?

There are a number of things to consider. If you order the food for booster club sales, factor in ordering and handling costs when charging to the booster club. If the booster club brings food into your food service areas for storage, determine if the purchased from an approved source (licensed distributor or merchant and not local game or home processed foods) to comply with Wisconsin Food Code. All items stored in school food service facilities must be appropriately labeled to identify them as belonging to the booster club. Inform the booster club representative(s) of the limited storage space and require advance arrangements so necessary accommodate can be made for their organizations food storage needs.

3. Do I need the bill to show the cost of items purchased for other groups (booster club) as non-program foods?

If you are purchasing the food items for other groups such as the booster club, documentation is needed to show that the booster club is billed the price of the food plus any associated costs to meet terms of the Agreement-Policy Statement.

4. If we don't currently separate out food costs for catered meals, how can we accurately calculate these costs?

The non-program food cost must be available to run the "Nonprogram Food Revenue Tool" and meet USDA requirements. However, as stated in question #1 of this Q&A, School Food Authorities (SFAs) agree to use program funds appropriately. Sufficient revenue must be received to cover all costs associated with nonprogram activities such as catered meals. Establish procedures for identifying and recording costs associated with the meal programs and any nonprogram activities. Many SFAs code or mark invoices to denote food, supply and equipment items purchases for the each of the meal programs and on any nonprogram activities. Conduct a labor study determine how much time is spent on program and nonprogram activities. Prorate labor expenditures accordingly. Management time is also considered to account for time spent on planning, ordering food and supplies, etc. Separate account codes within Fund 50 (public school districts) or in ledger formats (private schools) are used to keep detailed financial records of program and nonprogram food, labor, supply, equipment and other expenditures. Guidance may also be obtained from the National Food Service Management Institute (NFSMI) on nonprogram food pricing and on school food service account management. The *NFSMI Financial Management Information* resource is posted at: <http://www.nfsmi.org/documentlibraryfiles/PDF/20080225031916.pdf>.

5. Is it acceptable to just double the cost of food items sold on a la carte?

No. USDA requires that the revenue from the sales of nonprogram foods generate at least the same proportion of revenues as these items contribute to the food costs. In addition, School Food Authorities agree to limit use of funds received for programs. As stated in question #.1 in this section of the Q&A, complete the annual revenue calculations as required. The link to the "Non-program Food Revenue Tool" posted on DPI School Nutrition Team's website at: http://fns.dpi.wi.gov/fns_cnrsnp. If the calculations reveal that proportion of revenue is equal to or greater than the proportion of the food costs, no action is needed. If not, the SFA must review the prices charged for nonprogram foods and make necessary adjustments.

6. We sell bottled water a la carte. Do we need to be ready to justify pricing?

Yes. See answers to question # 1 through #5 in this section of the Q&A.

- 7. With the minimum amount of revenue from non-program foods how do you suggest pricing items when school stores sell the same items but have no labor and sell for cost? The students will purchase “cheaper” products from others if school store sells at cost or just above.**

You cannot control what items the school stores sell or the selling prices. Focus attention and resources on marketing strategies that prompt students to participate in the school meal programs instead of competing with the school store for a la carte sales. Such strategies include menu choices, convenient locations (kiosk), fast and friendly service, and promotions. Students who participate will receive the benefits of low cost, nutritionally balanced meals. Work with parent groups and administration to strengthen the wellness policy which should include guidelines on what is sold during the school day on school premises in completion with school meals to encourage healthy eating.

PROCUREMENT

- 1. When a school district sends out a bid (example a milk bid) how many companies need to put a bid in? How many on file does DPI check?**

Most purchases made by School Food Authorities (SFAs) in Wisconsin fall below the small purchase threshold (under \$100,000) which simplifies the procurement process. Formal bid process is not required and price quotes may be obtained. USDA recommends that SFAs request at least three bids/price quotes from known area suppliers. Three requests for bids/price quotes is just a minimum and School Food Authorities are encouraged to get as many price quotes as possible. DPI School Nutrition Team will review documentation to determine if all procurement is conducted in a manner that supports full and open competition. Appropriate procurement documentation includes a copy of the local supplier list, the request for bid proposals/price quotes sent to suppliers, and all correspondence received in response to the requested bids/price quote including the reasons why suppliers declined the opportunity to do business with the SFA.

- 2. We sell meals to a head start program two days per week. Do they need to do a new procurement that we would need a copy of?**

There are guidelines Head Start Program sponsors must follow to receive reimbursement for meals when contracting with DPI Community Nutrition Team to participate in the Child Care Food Program (CCFP). The Head Start Program must complete an agreement to specify details of the procurement arrangement. A CCFP prototype agreement for vendors that sell meals to a CCFP, including schools, is located on DPI's website at:

http://fns.dpi.wi.gov/files/fns/pdf/gm_13c_va_ccc.pdf. The contract period is for a year so a new agreement must be negotiated when the Head Start Program renews its CCFP contract with DPI Community Nutrition Team. The school that is selling the meals must follow all federal and state procurement requirements when purchasing food and supplies used in the preparation of the meals sold to the Head Start Program. No agreement is needed if the Head Start Program is administered by a school food authority and it is listed as a school site on the School Food Authority's on-line contract.

- 3. How can we buy more fresh fruit and vegetables when our budget is being cut?**

The new menu planning requirements and dietary specifications DO NOT REQUIRE School Food Authorities (SFAs) participating in the National School Lunch or School Breakfast Program to purchase MORE fresh fruits and vegetables. Menu planners may continue to use canned, frozen and fresh fruits and vegetables based on the price and availability. The challenge for SFAs is to

increase portions sizes of the fruits and vegetables and meet sodium restrictions on a limited budget. Offering more fresh fruits and vegetables is a good way to minimize sodium in the school meals. Here are some ideas for obtaining additional funding for fresh fruits and vegetables:

- Apply for the additional 6 cents per lunch reimbursement provided to SFAs certified as compliant with the new meal patterns.
- Research and apply for availability of funding from other sources such as Farm to School grants intended to help schools purchase locally grown produce.

To stretch food dollars, utilize existing resources to determine what vegetables and fruits are in season. One resource is USDA's Team Nutrition in season calendar. It is posted at: <http://healthymeals.nal.usda.gov/features-month/whats-season>. SFAs may also afford to buy more fresh fruits and vegetables with the costs savings generated from innovative procurement strategies such as:

- Engaging available suppliers to find ways to reduce cost for all purchased items, including fresh fruits and vegetables.
- Working with other schools and other non-profit agencies that provide meals (e.g., hospitals) to pool purchasing power.
- Joining purchasing cooperatives that already exist or forming cooperatives to obtain better prices and services.

Schools and other agencies that work together leverage greater purchasing volume in exchange for lower costs. DPI School Nutrition Team's Procurement Specialist is available to help SFAs establish effective procurement practices that meet USDA regulations. Contact Randy Jones at 608/267-2277 or his e-mail address: randall.jones@dpi.wi.gov

ADMINISTRATIVE REVIEWS

1. Are CRE/administrative reviews going to be held off one year?

DPI School Nutrition Team will complete administrative reviews in CESA 2 during school year 2012-13. Reviews for the School Food Authorities (SFAs) in CESA 8 and lower half of CESA 4 will be postponed so the team can focus on the 6 cent certification process and providing technical assistance. The reviews of SFAs in those two CESAs will be completed during the first year of the new 3 year administrative review schedule that goes into effect at the start of the 2013-14 school year. This updated review schedule will be posted on the DPI School Nutrition Team website when available

2. If you certify during SY 2012-13, will that effect when your next CRE review is?

No. Reviews will be set up on a new 3 year schedule as stated in the response to question #1 in this section of the Q&A. However, USDA requires that State Agencies complete reviews that were postponed so the School Food Authorities (SFAs) in CESA 8 and CESA 4 will be included in the 2013-14 school year review cycle. In addition, USDA is requiring State Agencies to conduct administrative reviews early in the review cycles for SFAs who are not compliant with the new meal pattern requirements because: (1) SFA did not apply for certification (2) SFA was denied certification or (3) SFA was certified but "turn off" due to findings during validation reviews.

3. If you can't/don't certify in SY 2012-13, and your 3 year is scheduled for SY 14-15, is that when you receive the 6¢?

The additional reimbursement is meant to encourage School Food Authorities (SFAs) to implement the updated requirements as quickly as possible. While there is no deadline for submitting certification documentation, USDA requires all SFAs to meet the new meal patterns

and be certified for the 6 cents reimbursement. Assistance will be provided by DPI's School Nutrition Team to help SFAs with the certification process. As stated in question #2 in this section of the Q&A, SFAs that do not apply will receive their administrative reviews early in the review cycles. State agencies have the option of certifying an SFA during the course of the administrative review. To be certified as part of the administrative review process, the SFA must complete and submit certification workbook(s) and the attestation on line. Specified documentation must be available at the time of the review to allow the DPI School Nutrition Team to complete the certification process. Further details will be provided to SFAs. Upon certification, the state agency must reimburse the certified SFA with the additional performance-based reimbursement for each lunch served beginning the start of the month in which the week of certified lunches are served.

4. For schools in CESA 2 that will be receiving a CRE/Administrative Review during SY 2012-13, will they be required to be certified using Option 3 (certified during an on-site review) or would they still be able to use Option 1 or 2 and submit a packet for certification?

School Food Authorities (SFAs) in CESA 2 receiving administrative reviews are not required to be certified prior to the review, but are urged to do so. A SFA receiving a review during the 2012-13 school year that is not certified must complete the appropriate workbook(s) and attestation using the online submission process. Every effort will be made to schedule the administrative review within a 60 day period after submission. SFAs in CESA 2 are also allowed to use Options 1 & 2. However, if these options are selected the SFA must submit nutrient analysis or the simplified nutrient assessment when submitting the completed workbooks. As stated above, every effort will be made to schedule the administrative review within a 60 day period after submission.

RESOURCES AND TRAINING

1. Can you put out all handouts for each breakout session?

Handouts were made available at the end of the *Focusing on New Requirements Today - Seeing Healthier Schools Tomorrow* Child Nutrition Reauthorization Conferences. The handout are posted on the Training Opportunities webpage along with copies of the power point presentation and recordings of each session. The webpage location is: http://fns.dpi.wi.gov/fns_training.

2. Is USDA coming out with new recipes for vegetables and legumes?

USDA will be releasing *Recipes for Healthy Kids*, 30 innovative recipes that support the whole grain-rich and vegetable subgroups sometime this summer. Many of these award winning recipes are available at: <http://www.recipesforkidschallenge.com/>.

3. Will the USDA recipes be updated to reflect the new meal pattern?

DPI School Nutrition Team anticipates that the USDA Quantity Recipes will be updated. No release date has been set.

4. Will the new USDA recipes contain a nutritional analysis as well as the contribution to the meal pattern?

It is anticipated that revised and any new USDA Quantity Recipes will provide nutrition information per serving as well as contribution to meal pattern.

5. Why doesn't USDA or DPI make out menus for us to use? Wouldn't it be easier for everyone, at least to start out with?

Making out your own menus allows you to plan for student and regional preference and provides flexibility when purchasing. Please see question #6 below for where to find cycle menus developed by Kansas and Ohio state agencies. Additional resources, including cycle menus, will also be posted on USDA's School Meal Pattern Clearinghouse at:

<http://healthymeals.nal.usda.gov/best-practices>,

6. Does the USDA have a 6 week cycle menu that they can just send to SFAs?

USDA indicated that a cycle menu that meets the new requirements may be available as a resource for school food authorities. State agencies and school food authorities are encouraged to use the School Meal Pattern Clearinghouse, <http://healthymeals.nal.usda.gov/best-practices>, for sharing or obtaining information. Check this site for cycle menus and other resources.

DPI's School Nutrition Team recently posted a link to a six-week cycle of lunch menus developed by Kansas Department of Education. Here is the link:

http://www.kn-eat.org/SNP/SNP_Menu/SNP_Resources_Healthier_Kansas_Menu.htm.

The Ohio Department of Education's *Menus that Move*, a set of seasonal cycle menus developed to help schools serve tasty meals that fit within USDA's new meal guidelines, is also available.

Each seasonal cycle menu contains five weekly menus that have been entered into the USDA Menu Certification Worksheet and meet both the required meal components and nutrient analysis.

These resources are posted at:

<http://education.ohio.gov/GD/Templates/Pages/ODE/ODEDetail.aspx?page=3&TopicRelationID=828&ContentID=131143&Content=131143>.

7. Will menu planning worksheets be posted on the DPI website and will they be available to be downloaded and modified by SFAs?

Yes, a variety of daily menu planning worksheets are available on the DPI's School Nutrition Team website at http://fns.dpi.wi.gov/fns_menupln#mp. Most are available in Word or Excel spreadsheet form that will allow SFAs to download, save and modify forms to meet their specific operations.

8. Will there be specific training for Residential Child Care Institutions?

DPI's School Nutrition Team will take this into consideration in planning future trainings.

9. What is an RCCI? Please provide a list of all these abbreviations and who they may pertain to. It is being assumed that everybody here is old schooled.

RCCI is the abbreviation for Residential Child Care Institutions. A list of abbreviations and/or acronyms will be available on the DPI's School Nutrition Team's webpage in the near future.

Check out the resources posted at: <http://fns.dpi.wi.gov>.

10. Comment: Rather than mass confusion, please create a release statement for parents highlighting the new rules and emphasizing that this is for the children's health and needs to be reinforced at home. It might be more impressive coming from Michelle Obama or the president.

Members of the School Nutrition Association have access to the New Meal Pattern PR toolkit that contains a sample letter to parents in English and Spanish titled "Healthy Changes in Our School Cafeterias", a template Press Release titled "(District) School Meals Meet Tough New Nutrition

Standards, New Meal Pattern Talking Points, and a customizable backpack brochure titled “School Meals are Nutritious”. To find the toolkit, go to www.schoolnutrition.org, click on “Resource Center, Promoting Your Program, and New Meal Pattern PR toolkit”.

USDA’s “The School Day Just Got Healthier Toolkit” is a collection of resources including brochures, fact sheets, FAQs, fliers, school lessons, templates and much more, to help prepare everyone for the changes to school meals this school year. This toolkit is separated by audience to help direct users to the most relevant and valuable tools and resources. Here is the website for this toolkit: <http://www.fns.usda.gov/cnd/healthierschoolday/toolkit.htm>. The link to a new resource was recently posted on the DPI School Nutrition Team website at: http://fns.dpi.wi.gov/fns_cnrsnp#ns.

11. Can you put together a short letter to explain all the new changes that we can distribute to families?

The DPI School Nutrition Team will give this some consideration. For School Nutrition Association (SNA) members, the SNA has posted a letter to parents on their website in both English and Spanish. Other resources are also available to help prepare everyone for the changes in the meals. See question #10 in this section of the Q&A.

12. Can we get as much help as we need to get certified? Do we have an opportunity to keep working with DPI until we are certified?

DPI School Nutrition Team has an ongoing training schedule which includes a review of the new meal pattern requirements plus hands-on computer lab to assist schools with the certification process. The current schedule is posted at: http://fns.dpi.wi.gov/fns_training. Additional opportunities will be available. Don’t hesitate to contact us with your questions and to request assistance. The DPI’s School Nutrition Team personnel directory is posted online at: http://fns.dpi.wi.gov/fns_directory.