Section 7

Breakfast Meals

Section 7, Breakfast Meals

Update Guide

June 8, 2026	Incorporated guidance from the Final Rule: Expanding Fluid Milk Options in Child Nutrition Programs.
March 11, 2026	Clarified guidance on seconds or additional servings.
September 2, 2025	Incorporated the following provisions based on *USDA Memo SP 13-2025, Full-Year Continuing Appropriations and Extensions Act, 2025: Effect on Child Nutrition Programs*: - Substituting Vegetables for Fruits at Breakfast Incorporated the following provisions from the final rule, *Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans*: - Added Sugars - Sodium Clarified guidance on the following: - Meal Pattern
February 14, 2025	Incorporated the following breakfast provisions from the final rule, *Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans*: - Meat/Meat Alternates at Breakfast - Substituting Vegetables for Fruits at Breakfast - Terminology Change: "Beans/Peas (Legumes)" vegetable subgroup changed to "Beans, Peas, and Lentils" - Removal of "Trans Fat" from the Nutrient Standards
May 31, 2024	Replaced reference to outdated "Menu Module" with updated meal pattern resources.
December 7, 2023	Clarified guidance on the following: - Milk meal pattern guidance for Ages 1-5 Crediting information for Nixtamalized products to align with SP 34-2019
May 19, 2023	Clarified guidance on the following topics: - Weekly whole grain requirements. - Refusing an item - Short and long week meal component adjustments Updated guidance as authorized by *USDA Memo SP 06-2023, Consolidated Appropriations Act. 2023: Effect on Child Nutrition Programs* Created new *Definitions* and *Contact Information* sections, located at the beginning of the *Administrator's Reference Manual (ARM)*. Removed definitions and contact information from this section.

July 28, 2022	Updated *Section 7, Breakfast Meals* to clarify guidance on: - Food production records - Grains component of the reimbursable breakfast - Meal pattern - Milk component of the reimbursable breakfast - Nutrient standards - Offer versus serve Incorporated the following United States Department of Agriculture (USDA) memos and guidance: - *USDA Memo SP 04-2022, Questions and Answer Guidance on the Final Rule titled Child Nutrition Programs: Transitional Standards for Milk, Whole Grains, and Sodium Effective July 1, 2022* (March 2, 2022) - *USDA Memo SP 05-2022, Meal Requirements Under the National School Lunch Program and School Breakfast Program: Questions and Answers for Program Operators Updated to Support the Transitional Standards for Milk, Whole Grains, and Sodium Effective July 1, 2022* (March 2, 2022) - *USDA Memo SP 08-2022, Consolidated Appropriations Act, 2022: Effect on Child Nutrition Programs* (April 6, 2022)

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Breakfast Meals

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

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

- *Section 8, Lunch Meals*
- *Section 9, Pre-Kindergarten Meals*
- *Section 14, USDA Foods*
- *Section 21, Meal Service*
- *Section 22, Competitive Foods*
- *Section 23, Food Product Labeling*
- *Section 25, Meal Accommodations*
- *Section 26, Food Safety*
- *Section 30, Record Retention*

Texas Education Code Requirements Related to Breakfast

Texas Education Code, Section 33.901[1] mandates that public and charter schools provide breakfast meal service in the following circumstances.

At least 10 percent or more of the students are eligible for free and reduced-price meals

If the public or charter school operates SBP,[2] the school must make a reimbursable breakfast available for all students. The amount a student is charged for a reimbursable meal is based on the student's eligibility category. Reimbursable meals are counted and claimed according to each student's eligibility category.

At least 80 percent or more of the students are eligible for free and reduced-price meals

If the public or charter school operates a breakfast program,[3] the school must offer universal breakfast (UB)[4] at no charge for all students. Reimbursable meals are counted and claimed according to each student's eligibility category even though no child is charged for breakfast.[5]

Universal Breakfast (UB) Waiver

TDA and Texas Education Agency (TEA) have developed a coordinated waiver process to facilitate submission and approval of waivers. A CE may request a waiver from the UB requirement if the following guidelines are met:

1 Section 33.901 was amended by Senate Bill 376, 83rd Texas Legislature and House Bill 1305, 84th Texas Legislature.
2 A CE that is mandated to offer breakfast may choose to operate a locally funded breakfast program.
3 A CE that is mandated to offer breakfast may choose to operate a locally funded breakfast program.
4 Texas CEs have long had the option to operate the Universal Free Breakfast Program (UFBP) which provides breakfast to all students at no charge. The UB requirement described in this subsection is not part of UFBP. It is a new requirement established by Senate Bill 376, 83rd Texas Legislature.
5 See the *Administrator's Reference Manual (ARM), Section 16, Financial System* and *Section 19, Meal Pricing* for additional information on the use of program funds and pricing meals.

Timeline for Universal Breakfast Waiver Submission

CEs must apply for a waiver after March 15, but before July 1 of the year preceding the SY for which the waiver applies.

For Example: A CE applies on April 3, 2019, for a waiver that will apply to SY 2019-2020.

- A waiver is in effect for only one school year. A CE must submit a new waiver for each year the CE chooses not to offer UB.
- If a CE does not apply for a waiver during this period, the CE must implement the UB requirements as mandated by the Texas Education Code in Senate Bill 376.

Required Actions Related to the Decision to Submit a Waiver

Any CE that chooses to submit a waiver from the requirement must take the following actions and retain documentation that demonstrates that the required actions were taken as part of its process to apply for a waiver from the UB requirements:

- The decision to apply for a waiver must be approved (1) at a regular school board meeting or (2) by the CE's governing body during an annual budget approval meeting.
- The decision to apply for a waiver must be a separate item on the agenda for the meeting described above.
- The school board or governing body must provide an opportunity for public comment before the decision is made at the school board meeting or governing body annual budget approval meeting.

Waiver Submission Process

To submit the *Universal Breakfast (UB) Waiver* form, the CE must take the following actions:

- Access the web-based form through the Texas Unified Nutrition Programs System (TX-UNPS).
- Complete and submit the web-based form demonstrating that the CE has submitted the waiver according to the timeline as well as taken the required actions and maintained documentation of those actions.

The CE will be notified about the waiver approval or disapproval.

Outreach to Households on the Availability of the School Breakfast Program (SBP)

In an effort to help more students benefit from the nutritious meals served in the SBP, CEs must inform households of the availability of breakfast.

Notification

A notification about the availability of breakfast must be provided to households just prior to or at the beginning of the SY. The CE should include this notification in the informational packets that are sent to each household with the free and reduced-price meal applications. In addition, CEs must send reminders regarding the availability of the SBP multiple times throughout the SY.

CEs can provide reminders to students through public address systems or through means normally used to communicate with the households of the enrolled students.

Other acceptable outreach activities may include developing or disseminating printed or electronic material to households and students.[6]

TDA encourages CEs to use the information in USDA's SBP toolkit, *Discover School Breakfast Toolkit*, a resource for outreach and expansion activities which is located at *https://www.fns.usda.gov/sbp/discover-school-breakfast-resource-materials*.

Meal Pattern

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

Adopting the meal pattern results in the following changes:

- Three-component meal pattern: fruit (or vegetable), grains, and milk.
- A required daily serving of fruit.
- Weekly grain ranges plus minimum daily requirements. At least 80% of grains offered during the serving week must be whole-grain rich.
- Whole, reduced-fat, low-fat, or fat-free milk may be served. May be flavored or unflavored for students in grades K-12.
- Meat/meat alternates may be offered instead of or in addition to grains.
- Under Offer versus Serve (OVS), the student must select at least ½ cup of the fruit (or vegetable) component for the meal to be considered a reimbursable breakfast.
- Calorie minimum and maximum levels based on age/grade groups.
- Sodium limits.
- Saturated fat limits.

Breakfast Meal Pattern

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

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

- Fruit (or Vegetable)
- Grains
- Milk

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

[6] CEs must retain documentation about these efforts. See the *Records Retention* subsection of the section for additional information on this topic.

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

CEs providing meals to pre-kindergarten students must use the pre-K meal pattern. See *Administrator's Reference Manual (ARM), Section 9, Pre-Kindergarten Meals* for detailed guidance on implementing the pre-K meal pattern.

Nutrition Standards in the School Breakfast Program (SBP)—Meal Pattern Chart
Minimum Amount of Each Food Component Per Week (Minimum Offering Per Day)

Meal Pattern Components	Grades K–5	Grades 6–8	Grades 9–12	Grades K-12
Milk, Unflavored or flavored approved fluid milk options[1]	5 (1) cups	5 (1) cups	5 (1) cups	5 (1) cups
Fruit (and Vegetables)[2]	5 (1) cups	5 (1) cups	5 (1) cups	5 (1) cups
Grains, 80% Whole Grain-rich per week[3]	7.0-10 .0 (1.0) oz eq	8.0-10.0 (1.0) oz eq	9.0-10 .0 (1.0) oz eq	9.0-10 .0 (1.0) oz eq
Nutrient Specifications: Daily Amount Based on Average 5-Day Week				
Min-Max Calories (kcal)	350-500	400-550	450-600	450-500
Saturated Fat[4] % of total calories	< 10	< 10	< 10	< 10
Sodium Target (mg)	T1 ≤ 540 mg	T1 ≤ 600 mg	T1 ≤ 640 mg	T1 ≤ 540 mg

1 Fluid milk served to students K-12 and adult participants may be unflavored or flavored, whole, reduced-fat, low-fat, or fat-free milk. For guidance on milk served to pre-kindergarten students, see *ARM Section 9, Pre-Kindergarten Meals*. SFAs may also offer lactose-free and reduced-lactose fluid milk. For K-12, one choice of milk must be unflavored at each meal service.
2 Juice must be full strength (100 percent juice) and may be used to meet the vegetable or fruit requirement at one meal per day, including snack.
3 Breakfast cereals must be whole grain-rich, enriched, or fortified and contain no more than 6 grams of added sugars per dry ounce (21.2 grams sucrose and other sugars per 100 grams of dry cereal).
4 Saturated fat from milk used to meet the fluid milk component requirements is excluded from the weekly dietary specification.

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

Measurement Conversion Chart
(Converting Common Serving Portion Sizes into Applicable Measurement Methods)[7]

Component			Other	Volume		Weight		Scoop Size (Scoop serving per quart)
				Level Measure (cup, Tbsp)	Fluid Ounce (fl oz)	Ounce (oz)	Ounce Equivalent (oz eq)	
Milk			--	½ cup	4	--	--	--
			--	¾ cup	6	--	--	--
Fruits/Vegetables			--	¼ cup	--	--	--	16
			--	½ cup	--	--	--	8
Grains	Bread Product: (biscuit, roll, muffin)		½ serving	--	--	0.5 oz	0.5 oz eq	--
	Cooked: Cereal, Cereal Grain, Pasta		--	¼ cup	--	0.5 oz	0.5 oz eq	16
	Ready-To-Eat Breakfast Cereal (Dry /Cold)	Flakes/Rounds	--	½ cup	--	0.5 oz	0.5 oz eq	8
		Puffed	--	¾ cup	--	1.0 oz	1.0 oz eq	4
		Granola	--	⅛ cup	--	0.5 oz	0.5 oz eq	30
Meat/ Meat Alternates	Lean meat, poultry, or fish		--	--	--	1.0 oz	1.0 oz eq	--
			--	--	--	1.5 oz	1.5 oz eq	--
	Tofu, soy product, or alternate protein products		--	⅛ cup	--	1.1 oz	0.25 oz eq	30
			--	⅓ cup	--	1.5 oz	0.33 oz eq	12
	Cheese		--	¼ cup	--	1.0 oz	1.0 oz eq	16
			--	⅓ cup	--	1.5 oz	1.5 oz eq	12
	Large egg		½ serving	⅛ cup	--	--	1.0 oz eq	30
			¾ serving	⅓ cup	--	--	1.5 oz eq	12
	Beans, peas, and lentils		--	¼ cup	--	0.5 oz	1.0 oz eq	16
			--	⅜ cup	--	1.5 oz	1.5 oz eq	10
	Peanut butter, soy nut butter, or other nut or seed butter		--	2 Tbsp	--	1.1 oz	1.0 oz eq	30
			--	3 Tbsp	--	1.7 oz	1.5 oz eq	20
	Yogurt, plain, or flavored unsweetened or sweetened		--	¼ cup	--	2.0 oz	0.5 oz eq	16
			--	½ cup	--	4.0 oz	1.0 oz eq	8
			--	¾ cup	--	6.0 oz	1.5 oz eq	4
	Peanuts, soy nuts, tree nuts, or seeds		--	--	--	0.5 oz	1.0 oz eq	--
			--	--	--	0.75 oz	1.5 oz eq	--

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

Breakfast Menu Planning

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

Breakfast Menu Planning Example Chart		
Components	**Food Items**	**Menu Items**
1. Fruit	1. Peaches	1. Fresh Fruit of the Day
2. Grains	2. Whole Grain Muffin	2. Muffin Surprise
3. Milk	3. Fat-Free Milk	3. Unflavored Milk or Chocolate Milk

Food Component

A food component[8] means one of the three food groups—fruit (or vegetable), grain, and fluid milk—that make up a reimbursable breakfast meal. Each of the three food components must be offered prior to the point of service (POS)[9] for the meal to be reimbursable.

At breakfast, vegetables may be substituted for fruit. See the *Fruit (or Vegetables) Component of the Reimbursable Breakfast* subsection in this section for additional information on substituting vegetables for fruit servings.

Food Items

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

Menu Items

Menu items are the actual foods served such as breakfast tacos, fruit salad, or muffins. Menu items may contain one or more components or food items.[10] The Breakfast Menu Planning Example Chart provides examples of components, food items, and menu items.

Whether a menu item consists of one or more components, all three required food components must be offered in the required amount for the meal to be reimbursable. All menu items should be offered prior to the POS.[11]

Crediting Foods

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

- 0.25 ounce equivalent (oz eq) for grain and meat/meat alternate components

  or

- ⅛ cup for fruit, vegetable, and milk components

[8] For breakfast there are three food components.
[9] See *Administrator's Reference Manual (ARM), Section 21, Meal Service* for additional information on this topic.
[10] See the *Reimbursable Breakfast Requirements* subsection in this section for additional information on combined food items.
[11] See the *Administrator's Reference Manual (ARM), Section 21, Meal Service* for additional information on this topic.

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

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

CEs must use the meal pattern age/grade groups to plan the menus. Because of the three distinct age/grade groups, CEs cannot offer the same meal portions to all grade levels. CE may use the age/grade group K–12 for breakfast. However, in menu planning, the menued items must fall into the overlap for the number of servings, portion size, and calories across all age/grade groups and meet the sodium standard for the lowest age/grade group.

Menu planners must (1) meet requirements both daily and weekly and (2) meet the nutrient specifications weekly.

Residential Child Care Institutions

Residential child care institutions (RCCIs) are not waived from the meal pattern requirements, including the nutrient standards.[12] To meet the caloric needs of students in RCCIs, the menu planner may increase the calories provided through other meal services such as snacks and the supper meal. If it is not possible to use the established grade groups, RCCI CEs do have some flexibility. See the *Administrator's Reference Manual (ARM), Section 28, Residential Child Care Institutions*, for additional information on this topic.

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

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

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

See the *Administrator's Reference Manual (ARM), Section 9, Pre-Kindergarten Meals* or the *Child and Adult Care Food Program—Child Care Centers Handbook* for detailed information on the pre-K meal pattern.[13]

Weekly Menu Planning

The reimbursable breakfast requires that students be served specific portion sizes by age/grade group for each of the three breakfast components per day and per week:[14]

[12] See to *Administrator's Reference Manual (ARM), Section 28, Residential Child Care Institutions* for additional information on this topic.
[13] Available at *www.SquareMeals.org*
[14] See the *Nutrition Standards in the School Breakfast Program (SBP)—Meal Pattern Chart* for requirements for preschool children.

Component	Age/ Grade	Minimum Amount Offered Each Day/Week
Fruit (Vegetables)[15]	K-12	→ 1 cup serving per day → 5 cups per week
Grains	K–5	→ 1.0 oz eq serving per day → 7.0-10.0 oz eq per week
	6–8	→ 1.0 oz eq serving per day → 8.0-10.0 oz eq per week
	9–12	→ 1.0 oz eq serving per day → 9.0-10.0 oz eq per week
Milk	K-12	→ 1 cup serving per day → 5 cups per week

The following requirements apply to serving meat/meat alternates and vegetables at breakfast:

- Full-strength Fruit/Vegetable Juice—May not be used to meet more than one-half of the weekly total fruit requirement.
- Meat/meat Alternates—May be offered instead of or in addition to grains, and may be counted toward meeting the grains requirement or may be served as an extra food item. If the meat/meat alternate is counted as an extra food item, it must be included in the weekly nutrient analysis.
- Vegetables Served in Place of Fruits— Schools choosing to substitute vegetables for fruit at breakfast on two or more days per school week are required to offer vegetables from at least two different vegetable subgroups. See the *Substituting Vegetables for Fruit* subsection in this section for more information.

In individual cases where a CE has an unusual age/grade configuration that prevents the use of the required age/grade groups, the CE may serve the same breakfast to all students in grades K–12 as long as serving sizes, weekly ranges of minimum amounts, and calories fall into the overlap of requirements for all age/grade groups served and meet the sodium standard for the lowest age/grade group.

[NOTE: The calorie range that fits all age/grade groups is quite narrow—450–500 calories. The weekly range of grains for age/grade group K–12 must be age/grade group 9–10 as this range is the overlap for the number grain servings for all three age/grade groups. However, the sodium standards must be the lowest age-grade group—K-5.]

CEs should also plan their menus so that the sum of the daily recommended maximum offerings[16] for grains and meat/meat alternates is equal to or less than the weekly recommended maximum offering limit in order to meet the weekly dietary specifications. Therefore, the sum of minimum daily amounts must meet the weekly minimum requirement, and the sum of the daily recommended maximum offerings should not exceed the weekly recommended maximum offerings.

Fruit (or Vegetable) Serving Portion

Larger servings of fruit (or vegetables) may be served at meals to improve student acceptability, to satisfy students' appetites, to provide additional energy, and, if carefully chosen, to increase the nutritional quality of the breakfast.

Substituting Vegetables for Fruit

Schools may substitute vegetables for fruit under the following:

- Schools choosing to offer vegetables at breakfast one day per school week have the option to offer any vegetable, including a starchy vegetable.
- Schools choosing to substitute vegetables for fruit at breakfast on two or more

[15] See the *Fruit (or Vegetable) Component of the Reimbursable Breakfast/Grains Component of the Reimbursable Breakfast, Fluid Milk Component of the Reimbursable Breakfast* subsections in this section for more information on serving size portions.

[16] USDA has waived the maximum serving amounts for grains and meat/meat alternates.

days per school week are required to offer vegetables from at least two different vegetable subgroups.

CEs will find that the updated *Food Buying Guide for Child Nutrition Programs*[17] will provide detailed information on the amount of fruit and/or vegetables needed for a creditable amount.

CEs with Shorter and Longer Weeks

CEs that regularly and consistently serve breakfast more than five days per week must increase the weekly component quantities by 20 percent (⅕) for each additional day.

Similarly, CEs that regularly and consistently serve breakfast less than five days per week must decrease the weekly component quantities by 20 percent (⅕) for each day less than five. The *Short and Long Week Adjustments for Breakfast Chart* provides detailed information for planning menus for shorter and longer weeks.

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

Information Box 1
Vegetable Subgroups

The following vegetable subgroups may be used:

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

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

- *http://choosemyplate.gov/*
- *https://fns-prod.azureedge.net/sites/default/files/usda_food_patterns/ItemClustersAndRepFoods.pdf*

[17] Available at *www.fns.usda.gov/tn/food-buying-guide-school-meal-programs.*

Short and Long Week Adjustments* for Breakfast Chart			
	Age/Grades K–5 Weekly (Daily)	**Age/Grade 6–8 Weekly (Daily)**	**Age/Grade 9–12 Weekly (Daily)**
Three-Day Week			
Fruits (cups)	3 (1)	3 (1)	3 (1)
Grains (oz eq)	4.0–6.0 (1.0)	5.0–6.0 (1.0)	5.5–6.0 (1.0)
Milk, Fluid (cups)	3 (1)	3 (1)	3 (1)
Four-Day Week			
Fruits (cups)	4 (1)	4 (1)	4 (1)
Grains (oz eq)	5.5–8.0 (1.0)	6.5–8.0 (1.0)	7.0–8.0 (1.0)
Milk, Fluid (cups)	4 (1)	4 (1)	4 (1)
Six-Day Week			
Fruits (cups)	6 (1)	6 (1)	6 (1)
Grains (oz eq)	8.5–12.0 (1.0)	9.5–12.0 (1.0)	11.0–12.0 (1.0)
Milk, Fluid (cups)	6 (1)	6 (1)	6 (1)
Seven-Day Week			
Fruits (cups)	7 (1)	7 (1)	7 (1)
Grains (oz eq)	10.0–14.0 (1.0)	11.0–14.0 (1.0)	12.5–14.0 (1.0)
Milk, Fluid (cups)	7 (1)	7 (1)	7 (1)
These calculations are rounded to the nearest 0.5 oz eq or ¼ cup.			

[NOTE: Since the dietary specifications are based on average daily amounts, they are unaffected by varied week lengths. They represent an average over the length of the week, whether consisting of three or seven days.]

CEs with Multiple Age/Grade Groups

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

See *Administrator's Reference Manual (ARM), Section 9, Pre-Kindergarten Meals* or the *Child and Adult Care Food Program—Child Care Centers Handbook* for additional information on the pre-K meal pattern.[18]

See the *Residential Child Care Institutions* subsection in this section for additional information on age/grade requirements specific to RCCIs as well as the *Administrator's Reference Manual (ARM), Section 28, Residential Child Care Institutions (RCCIs)*.

Fruit (or Vegetable) Component of the Reimbursable Breakfast

CEs must offer the fruit component every day; however, vegetables may be substituted for fruit as described in this subsection. CEs must offer a 1 cup serving of fruit (or vegetable) to each student for breakfast. A student must take at least ½ cup for a reimbursable meal.

Crediting Fruits and Vegetables

The minimum creditable amount of a fruit (and/or vegetable) that may be credited toward the meal pattern is ⅛ cup. Under OVS, ½ cup is the minimum amount of fruits and/or vegetables per day that a student must be served for a reimbursable meal.

[NOTE: A student who is served a plated meal must be served the required minimum offering for each component but

[18] Available at *www.SquareMeals.org*

may request and be given a smaller portion size of any item. If the student takes a smaller portion size of any item, the remaining amount must meet the requirements described in the ***Reimbursable Breakfast Requirements*** subsection in this section.]

Crediting Fruits and Vegetables for a Reimbursable Meal Chart	
Minimum Creditable Amount of Fruit (or Vegetables) Taken by a Student	**Minimum Portion Size or Amount of Fruits (or Vegetables) Taken by a Student**
⅛ Cup	**½ Cup**
How Creditable Amount Is Used…	**How Minimum Portion Size or Amount Is Used…**
A creditable amount contributes toward meeting the minimum serving portion size or amount.	A minimum serving portion size or amount counts toward meeting the minimum food component requirements for a reimbursable meal.

The creditable amount may be reached by combining different fruits and vegetables to reach a ½ cup serving amount.[19]

For Example: In an OVS service, the student takes a fruit/vegetable mix that contains ⅛ cup apples, ⅛ cup oranges, ⅛ cup grapes, and ⅛ cup avocado. The total fruit/vegetable mix is ½ cup.

There are no maximum limits (daily or weekly) on the amount of fruit or vegetable subgroups offered at breakfast.[20]

Non-Creditable Amount of Fruit or Vegetable

Small amounts (less than ⅛ cup) of fruits or vegetables used for flavoring or as an optional ingredient for a garnish must not be counted toward the fruit component requirement.

Offer Versus Serve (OVS) and the Fruit Component

Under OVS, CEs must offer enough food items for each student to take the full minimum daily requirement for each component.[21] A student must be offered at least 1 cup of either a fruit or vegetable or a combination of fruit and vegetables and must take ½ cup of fruit or vegetables for a reimbursable meal. For a reimbursable meal, a student may take smaller portions of the fruit (and/or vegetable if offered) component. For additional information regarding OVS and fruits and vegetables, see the *Reimbursable Breakfast Requirements* subsection in this section.

Fruits

CEs may offer the following types of fruit:

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

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

[19] See the *Reimbursable Breakfast Requirements* subsection in this section for additional information.
[20] See the *Reimbursable Breakfast Requirements* subsection in this section for additional information on this topic.
[21] See the *Crediting Fruit and Vegetable for Reimbursable Meal Chart* in this section for daily requirements by age/grade group.

Coconut

Fresh, frozen, and 100% coconut juice are creditable by volume. Dried coconut is credited toward the fruit component at twice the volume served. When served as a food component, the minimum creditable amount to be served is ⅛ cup.

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

Coconut flour and coconut oil are not creditable.

Dried Fruit

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

For Example: A ¼ cup of raisins contributes ½ cup fruit toward the fruit requirement.

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

Frozen Fruit with Added Sugar

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

Vegetables

100% Vegetable Flour

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

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

Beans, Peas, and Lentils

Beans, peas, and lentils may be offered as a meat alternate, crediting as a substitute for the grains component, or as a vegetable at the discretion of the menu planner.[22] One serving may not count toward two different food components in the same meal. However, two different servings of beans, peas, and lentils may count as two separate components.

For Example: One serving of refried beans can be offered as a vegetable crediting for the fruit component, but this same serving cannot count toward the grains weekly requirement as a meat/meat alternate substitution for the grains component.

Two servings of refried beans can be credited as one serving of a vegetable counting toward the fruit component and the second serving counting as a meat/meat alternate substitution for the grains component.

For additional guidance on beans and peas, see: *www.choosemyplate.gov/*.

Extruded Vegetable Products

Meal pattern contributions of extruded vegetable products can be found in the *Food Buying Guide for Child Nutrition Programs*.[23] For any food item not listed in the guide, a manufacturer's product formulation statement should be used to determine the contribution extruded products make toward the meal pattern requirement.[24]

Herbs as Vegetables

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

Hominy, Vegetable Form

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

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

Leafy Salad Greens

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

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

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

Iceberg lettuce is not considered a Dark Green vegetable, but a salad that consists of a variety of dark leafy greens (such as spinach or romaine lettuce) does count toward the Dark Green subgroup.

If the mixed salad contains different vegetable subgroups and the quantities of each subgroup are known, they can be credited toward each subgroup if the amount served is at least ⅛ cup.

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[22] For breakfast, CEs may credit meat/meat alternates toward the grains component or as an Extra. See *Meat/Meat Alternate Component Substituting for the Grains Component of the Reimbursable Breakfast* subsection in the section for additional information on this substitution.

[23] Available at *www.fns.usda.gov/tn/food-buying-guide-school-meal-programs*.

[24] For additional information, see *Administrator's Reference Manual (ARM), Section 23, Food Product Labeling* located at *www.SquareMeals.org*.

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

Roasted Legumes

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

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

Starchy Vegetables as an Extra Food Item—Not Served As a Substitute for the Fruit Component

CEs may offer a Starchy vegetable as an extra food item for a breakfast meal that is not a substitute for the breakfast fruit component under the following conditions:

- The Starchy vegetable extra food item does not cause the weekly menu to exceed the weekly dietary specifications—calories, sodium, and saturated fat.
- The Starchy vegetable extra food item is not counted as a substitute for the fruit component serving for a reimbursable meal.
- For a reimbursable meal, the student must be offered 1 cup and must take at least ½ cup of a different fruit (or vegetable) that is menued to meet the fruit component requirement in addition to the Starchy vegetable extra food item.
- Since the Starchy vegetable extra item is not offered as a vegetable substitute for the fruit component, the CE is not required to offer non-Starchy vegetables first as described in the *Vegetable Substituting for Fruits* subsection in this section.

Fruit or Vegetable Juice

Juice is defined as follows:

> One hundred percent full-strength fruit (or vegetable juice) is an undiluted product obtained by extraction from sound[25] fruit. It may be fresh, canned, frozen, or reconstituted from concentrate and may be served in either liquid or frozen state. Diluted juice is no longer allowed.

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

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

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

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

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

[25] In this section, s*ound fruit* means a product made from 100% fruit.

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

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

Creditable Juice

For juice to be creditable toward the fruit component, a minimum of ⅛ cup of juice must be taken. However, juice and fruit juice concentrate cannot be credited when used as an ingredient in another food or beverage product.

For Example: One-quarter (¼) cup of gelatin made with 1 tablespoon of juice concentrate and water does not contribute as ¼ cup of juice since the fruit juice is no longer in the form of liquid or frozen juice.

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

Not from Concentrate

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

From Concentrate

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

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

Juice Concentrate

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

Creditable Juice Blends

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

100 Percent Vegetable Juice and Serving Starchy Vegetables

If the first ingredient is a vegetable juice, then the 100% blend may contribute as a vegetable substituting for the fruit component.

- Vegetable juice blends containing juice from any vegetable subgroup[26]—Dark Green, Red/Orange, Beans, Peas, and Lentils, or Other—credit as that vegetable subgroup.
- Vegetable juice blends containing vegetables from more than one subgroup credit as the Additional vegetable subgroup.

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

[26] See the *Weekly Menu Planning* subsection in this section for more information on serving Starchy vegetables.

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

Creditable Blended Dish Items with Pureed Fruit or Vegetables

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

- *Food Buying Guide for Child Nutrition Programs*,[27] including the introduction that contains information about how to obtain in-house yield data.
- Manufacturer's product formulation statement

Creditable amounts of pureed fruit or vegetable food components in a blended dish item may contribute toward the meal pattern requirements as long as a creditable amount (⅛ cup) of a recognizable food component is in the dish. If the dish does not contain at least ⅛ cup of a recognizable food component, then, the blended food item does not contribute to the meal pattern requirements.

For Example: When a dish contains ⅛ cup of recognizable chopped blueberries and ⅛ cup of unrecognizable pureed apples, both the blueberries and apples may be credited toward the fruit component since there is at least ⅛ cup of a recognizable fruit component in the dish.

Non-Creditable Juice

The following uses of juice and juice concentrate cannot credit toward the fruit component:

- An ingredient in another food or beverage product
- Small amounts (less than ⅛ cup) of fruits or vegetables used for flavoring or as an optional ingredient for a garnish
- An ingredient added to gelatin
- A juice product with a label that says 100% juiced

Mixed Fruit and Vegetable Dishes

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

For Example: Fruit cocktail or mixed vegetables

However, vegetable combinations from the same subgroup (e.g., carrots and sweet potatoes are Red/Orange vegetables) may count toward that single vegetable subgroup. Vegetable combinations that contain at least ⅛ cup of each of different vegetable subgroups (e.g., carrots and corn) may credit each one toward the appropriate subgroup.

Salsas or Picante Sauce

Served in amounts ⅛ cup or greater, ingredients in salsas or picante sauces may be credited as a fruit and/or vegetable component as long as the product contains all fruit and/or vegetable ingredients plus minor amounts of spices or flavorings. For products that contain non-fruit or non-vegetable components, like gums, starches, or stabilizers, only that portion of the product that is a fruit and/or vegetable ingredient may be counted towards the ⅛ cup volume requirement. A manufacturer product formulation

[27] Available at *www.fns.usda.gov/tn/food-buying-guide-school-meal-programs.*

statement[28] should be used to determine the contribution of the fruit and/or vegetables toward the meal pattern requirement.

Snack Type Products

Reimbursable meals must not credit snack-type fruit products. Snack-type fruit products that are not creditable include the following:

- 100% fruit strips
- Fruit drops
- Other snack-type fruit or vegetable products

Common Problems: Fruits and Vegetables

Menu planners should be aware of the following problems commonly found in serving fruit and vegetables.

1. Food items that do not count toward contributing to the fruit component are mistakenly used and counted. This includes (1) pasta and rice, which actually contribute to the grains component, and (2) jam and gravy, which are considered Other foods and do not contribute to the breakfast meal pattern.

   Solution: When in doubt about what contribution a particular food item makes to the breakfast meal pattern, always consult the Food Buying Guide for Child Nutrition Programs.[29]

2. Juice drinks are mistakenly credited as full-strength fruit juice.

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

   [NOTE: Some frozen sweetened juice concentrates yield full-strength juice when diluted one to one. Read the label for directions. Juice drinks are not creditable; only 100% fruit juice is creditable under the breakfast meal pattern.]

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

   Solution: Take the following actions:

   - Determine the contribution of breaded products by removing the breading of the cooked product and measuring the volume of fruit; document findings.
   - Determine the contribution of extruded products by obtaining a company product formulation statement before serving.

Grains Component of the Reimbursable Breakfast

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

- To qualify as whole-grain rich, products must contain at least 50 percent whole grains and the remaining grain, if any, must be enriched.

[28] For additional information, see *Administrator's Reference Manual (ARM), Section 23, Food Product Labeling* located at *www.SquareMeals.org*.
[29] Available at *www.fns.usda.gov/tn/food-buying-guide-school-meal-programs.*

- To qualify as an enriched grain, products must have been fortified with additional nutrients to replace the vitamins lost during the refining process or may be a fortified cereal.

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

Minimum Grains Requirement

Under the meal pattern requirements, the CE must offer the minimum daily requirement for grains—1.0 oz eq each day of whole-grain rich—for a reimbursable breakfast for all age/grade groups (K to 12). However, to meet the weekly breakfast requirement for grains for all age/grade groups, the CE will need to offer more than the minimum daily on some days of the week.

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

	Amount of Grains Per Week (Minimum Per Day)		
	Age/Grades K–5	Age/Grades 6–8	Age/Grades 9–12
Grains (oz eq) *	7.0–10.0 (1)	8.0–10.0 (1)	9.0–10.0 (1)

Recommended Maximum Grain Offerings

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

Whole-Grain Rich Foods

Quantities of grains in the meal patterns for the SBP is based on oz eq.

Whole-grain rich foods must meet (1) the serving size requirements for grains and (2) meet at least one of the following:

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

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

1. Bran
2. Germ
3. Endosperm

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

Criteria for Whole-Grain Rich Foods for Breakfast

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

enriched.

Fifty Percent Guideline

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

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

Adding Whole Grains to Menus

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

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

Determining Whole-Grain Rich Products

CEs can use the following elements as a simple checklist to determine if a grain product meets the whole-grain rich criteria:

Element 1	Element 2
The food item must meet the portion size requirements for grain component as defined in FNS guidance. See the ***Breakfast Meal Pattern Chart*** for detailed specifications on the requirements by age/grade group.	The food must meet at least one of the following criteria: a. The whole grains per serving must be ≥ 8 grams.[30] b. The products include the following Food and Drug Administration (FDA)-approved whole-grain health claim on its packaging: Diets rich in whole-grain foods and other plant foods and low in total fat, saturated fat, and cholesterol may reduce the risk of heart disease and some cancers. **or** Diets rich in whole-grain foods and other plant foods, and low in saturated fats and cholesterol, may help reduce the risk of heart disease. c. The product ingredient statement lists whole grains first, specifically as follows:[31] 1) Non-mixed dishes (e.g., breads, cereals): whole grains must be the primary ingredient by weight (a whole grain is the first ingredient in the list with the exception of water as the first ingredient for fully cooked grain and pasta items). 2) Mixed dishes (e.g., pizza, corn dogs): Whole grains must be the primary grain ingredient by weight (whole grain is the first grain ingredient in the list). Flour blends are listed in the ingredient list and grouped together with parentheses as in the following example. For Example: Flour blend (whole wheat flour, enriched flour), sugar, cinnamon, etc.

The menu planner will need to know whether the whole grain content is at least 8.0 grams per oz eq or that the weight of the whole grain is greater than the first ingredient listed after the flour blend, such as the sugar in Element 2.

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

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

[31] The product ingredient declaration is a practical way for CEs to identify whole-grain rich products because manufacturers are not required to provide information about the grams of whole grains in their products, and the FDA whole grain health claim is not mandatory. Detailed instructions for this method appear in the *Whole Grain Resource for the National School Lunch and School Breakfast Program*, which is available online at *www.fns.usda.gov/tn/whole-grain-resource.*

Crediting Grains

The following whole grains are allowed:

Barley
- Whole barley
- Whole-grain barley
- Whole-barley flakes
- Whole-barley flour
- Whole-grain barley flour

Corn
- Whole corn
- Whole-corn flour
- Whole-corn masa
- Whole-grain corn flour
- Whole-grain corn harina
- Whole-grain corn masa
- Whole-grain cornmeal
- Whole cornmeal

Oats
- Whole oats
- Oat groats
- Oatmeal or rolled oats
- Whole-oat flour

Rice
- Brown rice
- Brown rice flour

Rye
- Whole rye
- Rye berries
- Whole-rye flour
- Whole-rye flakes

Wheat
- Wheat berries
- Whole-grain wheat
- Cracked wheat
- Whole-wheat flour
- Graham flour
- Whole durum flour
- Sprouted wheat
- Bulgur
- White whole-wheat flour

Wild Rice
- Wild rice
- Wild rice flour

Cereal Grains

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

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

For Example: A quarter (¼) cup cooked brown rice blended with ¼ cup cooked enriched rice is 1.0 oz eq grain that meets the whole grain-rich criteria for Grades K-8.

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

Corn Masa, Corn Flour, and Cornmeal Products

When served as a grain component, corn masa, corn flour, corn harina, and cornmeal products labeled as whole grains are credited by weight for these products as described in *Exhibit A: Grain Requirement for Child Nutrition Programs*.[32]

Corn Flour or Corn Meal—Nixtamalized or Treated with Lime

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

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

or

[32] Available at *www.fns.usda.gov/tn/food-buying-guide-school-meal-programs.*

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

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

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

Formulated Grain-Fruit Product

A formulated grain-fruit product may be credited toward the grains component for SBP. However, the menu planner will need to make sure that the product does not cause the week's menu to exceed the weekly calorie total and that these products have a statement on the label saying they meet a grain and fruit serving. These products cannot credit toward the fruit component.

Grains and Combination Food Items

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

For Example: A breakfast taco that contains adequate grains (including meat/meat alternates credited toward the grains component) to meet the minimum daily requirement as well as ⅛ serving of tomatoes.

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

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

Hominy, Corn Masa, or Masa Harina—Enriched

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

Hominy, Dried or Milled—Whole Grain

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

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

Grits

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

Less Than Two Percent of Product, Non-Creditable Grain Ingredients

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

meal.

Non-Credited Extra Grain Food Items

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

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

Non-Creditable Grains Products

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

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

Popcorn

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

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

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

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

Ready to Eat Breakfast Cereal

A ready-to-eat (RTE) breakfast cereal must list a *whole grain* as the primary ingredient. If the grain product includes enriched ingredients, or the product itself is enriched, the ingredients or the grain product must meet the FDA's standard of identity for enrichment.[33] One hundred percent whole grain cereals do not need to be fortified. Bran and germ are not creditable as an enriched ingredient in NSLP. Non-creditable grain ingredients in products at very low levels used as processing aids are allowable at levels less than two percent.

Serving Non-Whole-Grain Rich and Non-Enriched Grains

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

Stone-Ground Corn or Degermed Corn

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

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

Items designated as WIC-approved credit toward whole-grain rich even if the product has

[33] See 21 CFR 137 for additional information on this topic.

non-creditable grain ingredients anywhere in the ingredient statement.

Determining Daily Grain Contribution

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

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

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

Food Buying Guide for Child Nutrition Programs

CEs should refer to the *Food Buying Guide for Child Nutrition Programs, Appendix E, Exhibit A*[34] for an updated list of whole-grain rich equivalent requirements for school nutrition programs. When any cereal grain is used as an ingredient in a grain product, use the serving size given for the appropriate grain group.

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

Criteria for Determining Ounce Equivalent Serving Sizes

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

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

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

Weekly Grains Minimum Requirement and Maximum Recommendation

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

[34] Available at *www.fns.usda.gov/tn/food-buying-guide-school-meal-programs.*

Breaded Products

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

Fully Cooked Grains, Water As First Ingredient

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

Documentation for Crediting Grains

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

CEs should use updated *Food Buying Guide for Child Nutrition Programs (FBG)*[35] to assist them in determining the grain contribution in a recipe. If this information is not listed, the *FBG* also provides a formula for making this calculation. CEs may also use a product formulation statement to help with this determination.

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

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

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

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

Total Grams of Creditable Grains in the Food Product	÷	16.0	=	**Number of Ounce Equivalents in Food Product**

If calculating the total grams of creditable grains for a product or recipe and the total grams of creditable grains is not reported by serving portion size, divide by the total number of serving portions in the product or recipe.

Reminders Regarding Grains

1. Do not include grain food items offered at lunch as contributing to the required number of servings of grains per week required by the breakfast meal patterns.
2. The grain requirement is determined on a weekly basis. At least 80 percent of the grains offered for the week must be whole-grain rich. Any grain offered that is not whole-grain rich or enriched is not creditable. If offered, the non-whole-grain rich or non-enriched grain product must be counted as an Extra item and must be included in the weekly

[37] Available at *www.fns.usda.gov/tn/food-buying-guide-school-meal-programs.*

dietary specifications.

3. When a choice of two different menu items is offered, CEs should credit for the smaller-sized grain offering for the day when determining the minimum amount of grain offered each day and for the weekly total.

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

Pancake Bar	Sausage on English Muffin
2 pancakes = 1 grain	1 muffin = 2 grains

Grains Product Labeling

Manufacturers producing qualifying products (meat/meat alternate entrées containing grains) may apply for a Child Nutrition (CN) Label[36] to indicate the number of oz eq grains that meet the whole-grain rich criteria. The term *oz eq grains* on the CN Label indicates that the product meets the whole-grain rich criteria.[37]

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

Common Problems: Grains

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

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

2. A smaller-sized portion of the menu item being credited daily as a grain is served in the lower grades thus reducing the serving size to less than one full serving, including oatmeal, wheat cereal, and toaster pastries, pizza, and granola chips.

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

Meat/Meat Alternate Component Substituting for the Grains Component of the Reimbursable Breakfast

Offering meat/meat alternates (M/MA) as part of the breakfast menu is optional. If M/MAs are offered, CEs should use a variety of meat/meat alternates, such as eggs, ground beef, turkey, ham, cheese, nuts and seeds or nut and seed butters, yogurt, dried peas and beans, fish or poultry, or alternate egg dishes with other main dishes.

For Example: The following suggestions illustrate ways to offer a variety of meat/meat alternate food items:

- Use low-fat ingredients to prepare combination dishes, such as an egg-cheese casserole, breakfast burritos, breakfast sandwiches, and breakfast pizza.

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

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

- Mix nuts and seeds with dried fruits to serve as is or as a topping for hot cereal.
- Blend nuts and seeds into pancake and waffle batters.

For additional information on the range of possible meat/meat alternates, see the *Meat/Meat Alternates Component of the Reimbursable Meal* in *Administrator's Reference Manual (ARM), Section 8, Lunch Program*.

Under the breakfast meal pattern requirements, the meat/meat alternate component may be combined with the grains component. Schools may offer grains, meat/meat alternates, or a combination of both, to meet the minimum ounce equivalent requirements in this combined meal component. If offered in this circumstance, the meat/meat alternates will count toward the weekly grain minimum as grains.

[NOTE: When a menu planner counts meat/meat alternates as a substitute for grains, the menu planner must not count the ounces of meat/meat alternates when determining if all of the grains served are whole-grain rich.

For Example: The menu planner offers 6.0 oz eq grains and 3.0 oz eq meat/meat alternates to meet the minimum requirement of 9.0 oz eq grains for grades 9-12. In this case, the menu planner must make sure that 3.0 oz eq of the 6.0 oz eq grains are whole-grain rich.]

A meat/meat alternate serving may also be counted as an additional food that does not count toward any component. If a meat/meat alternate is offered at breakfast as an additional food, the food item must fit within the weekly dietary specifications (calories, saturated fats, and sodium).

Whenever possible, CEs should use items that have lower fat content.

For Example: The following suggestions illustrate ways to offer food items that have lower fat content:

- Serve lower fat meat/meat alternates, such as fresh or frozen lean meat, poultry, yogurt, or cooked dry beans, tofu[38] and soy yogurt instead of processed meats.
- Use cheese made from skim milk.
- Mix low-fat cottage cheese with dried fruits to use as a spread for bread in place of cream cheese or butter.

Purchased Prepared Menu Items

Purchased prepared menu items are used to contribute to the meat/meat alternate component of the breakfast and should be supported by a child nutrition (CN) label, product analysis sheet, or company product formulation statement.

Steps before Purchasing Any Meat, Poultry, Fish, or Tofu Product

CEs should follow the steps below before purchasing any meat, poultry, fish, or tofu product:

- Request a sample of the product and the product label and be certain that the product purchased with the same label is received.
- Check to see if the label has percentage ingredient listing and request percent labeling on products purchased to know the product's ingredients that contribute to the meal pattern if necessary.

[38] To be credited, tofu must contain at least 18 percent protein by weight when fully hydrated or formulated. For example, 2.2 oz (¼ cup) of commercially-prepared tofu, containing at least five grams of protein, is creditable as 1.0 oz eq meat/meat alternate.

- Check to see if the fat content, both total fat and saturated fat, of the item is listed on the label.
- Check to see if the sodium content is listed on the label.
- Weigh the actual product to see if the net weight is correct.
- Check to see if the USDA statement verifying the use of the alternate protein product) in the SBP is printed on the label (if the product contains alternate protein product). This statement is not required to appear on meat, poultry, or fish labels but often does.

Information Box 2

Additional Information on Meat Products

Meat and Poultry Inspection in Texas

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

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

Telephone: (512) 834-6760
TDD: 1-800-735-2989
Fax: (512) 834-6763

Standards for Meat and Poultry Products

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

Common Problems:
Meat/Meat Alternates Served as a Substitute for the Grains Component

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

   Solution:

   - Secure a CN label or manufacturer product formulation statement before purchasing the menu item.
   - Monitor deliveries to ensure that the products used are those ordered and documented.
   - Use the USDA Standards for Meat and Poultry Products to determine the content of certain products.[39]

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

   Solution: Check all CE recipes against the *Food Buying Guide for Child Nutrition Programs*.

3. The menu item is served with the wrong-sized utensils, thus changing the contribution of the menu item to the meat/meat alternate component.

   Solution: (1) List serving size or proper utensil to be used on production record as well as recipe card. (2) Monitor meal service and production records for unexpected leftovers or shortages.

4. Beans, peas, or lentils are used as meat alternate and a vegetable in the same meal.

   Solution: When using beans, peans, and lentils as the meat/meat alternate in a menu item, such as chalupas, remember to plan Other vegetables in sufficient amounts.

[39] See the USDA Agricultural and Marketing Services website (*www.fns.usda.gov/fdd/specifications-us-grade-standards)* as well as information on select Grading, Certification, and Verification for additional information on this topic.

Milk Component of the Reimbursable Breakfast

CEs must offer at least two approved fluid milk options as part of a reimbursable breakfast for students in grades K-12. Fluid milk must meet the following requirements:

	Approved Milk Options
K-12	Unflavored or flavored whole, reduced-fat, low-fat, or fat-free milk

For students in grades K-12, milk may be flavored or unflavored—however, if a site serves a flavored milk choice, the site must also serve an unflavored milk choice at the same meal service.

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

No matter the type of meal service used,[40] every reimbursable meal must include a choice of milk.

Lactose-Free Milk

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

1. Is unflavored or flavored whole, reduced-fat, low-fat, or fat-free milk.
2. Meets the nutritional requirements.

Organic

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

Requirement to Take Milk

If the site does not use OVS, a reimbursable meal must include milk or an acceptable milk substitute, except for a child with a disability.[41] Under OVS, a meal without fluid milk is reimbursable.

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

Guidance for Offering Milk and Other Beverages

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

- The CE may not

[40] See *Administrator's Reference Manual (ARM), Section 21, Meal Service* for more information on types of meal service.

[41] See the *Milk and Children with Disabilities or Other Dietary Issues* subsection in this section for additional information.

offer juice for free to students who refuse milk while charging an a la carte price for juice to other students who select milk as part of a reimbursable meal.

- The CE may

  offer milk as a component of the reimbursable meal and charge all students selecting juice an a la carte price for their juice.

  or

  provide all students with milk and a second beverage at no extra charge.

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

- The CE may not offer students a choice among milk, tea (high school only),[42] and a fruit-flavored drink for a reimbursable meal.
- CEs may exclude saturated fat from **fluid dairy milk only**[43] when calculating weekly averages for saturated fat.
  - However, fluid milk must still be included in the calculation of all other dietary specifications (including calories, sodium, and added sugars).
- Additional or extra beverages—100 percent juice, water, iced tea, etc.—may be offered after the POS, but these beverages must be included in the dietary specifications for the week. Any 100 percent juice offered after the POS must count toward the weekly juice limit.
- Additional or extra beverages, including water, must be placed in such a way that they do not discourage students from taking milk.

Fluid Milk Substitutes

A CE has the option to offer a nondairy milk substitute to **all** students to meet the fluid milk requirement. If a CE chooses to offer nondairy beverages to all students, the CE is not required to notify TDA about the substitution, and students are not required to submit a written statement to request a milk substitute for a non-disability reason.[44]

Non-dairy beverages (milk substitutes) must be nutritionally equal to milk and meet the nutritional standards for fortification of calcium, protein, Vitamin A, Vitamin D, and other nutrients to levels found in cow's milk, as outlined Food and Drug Administration (FDA) regulations. If CEs offer a milk substitute, they must notify TDA about the milk substitute product.[45]

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[42] See the *Administrator's Reference Manual (ARM), Section 22, Competitive Foods* for additional information on this topic.

[43] Only milk used to meet the fluid milk component requirements may be excluded from the weekly dietary specification. Nondairy milk substitutes and milk used in recipes do not qualify for this exclusion.

[44] For more information, *see ARM Section 25, Meal Accommodations*.

[45] See the Contact Information for the Texas Department of Agriculture (TDA), Food and Nutrition box located at the beginning of this manual.

Milk Substitute Specifications

If CEs choose to offer a milk substitute, they are not required to offer a choice of acceptable milk substitutes. However, any nondairy beverage offered as a milk substitute must be nutritionally equivalent to fluid milk. See the *Milk Substitute Nutritional Profile Chart* for specific nutritional information for milk substitutes.

Milk Substitute Nutritional Profile Chart
(mg=milligram; g=gram; mcg=micrograms)

Nutrient	Minimum Amount Per 1 Cup Serving as Reported on Product Documentation
Calcium	≥ 276 mg
Protein	≥ 8 g
Vitamin A	≥ 150 mcg
Vitamin D	≥ 2.5 mcg
Magnesium	≥ 24 mg
Phosphorus	≥ 222 mg
Potassium	≥ 349 mg
Riboflavin	≥ 0.44 mg
Vitamin B-12	≥ 1.1 mcg

The fat content of fluid milk substitutions, such as soy milk are not subject to the regulations regarding fat content that apply to regular fluid milk. Therefore, fluid milk substitutions can have a higher fat content than fat-free or 1% milk.

A manufacturer's signed statement may be used to provide nutrient information for milk substitutes.

CE Chooses Not to Offer Fluid Milk Substitutes

Offering nondairy beverages to all students to meet the fluid milk requirement is an **option**, not a requirement. If a CE declines to offer nondairy options, students requesting a nondairy substitute for non-disability reasons must still use the following process:

- Student provides a written request from the student's parent or guardian, a State licensed healthcare professional, or a registered dietitian that identifies the reason for the substitute.
- CEs evaluates the request.
  Note: CEs are **not** required to offer the exact substitute requested.

If a student requested a substitute through this process, CEs must inform TDA by submitting the *Fluid Milk Substitute Worksheet*[46].

Special Guidance, Milk Substitutes

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

Lactose-Reduced Milk

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

Milk and Children with Disabilities or Other Dietary Issues

For a child with a recognized disability, the meal may consist of fewer than 5

[46] Available at *www.SquareMeals.org*.

components. The child may be served as an alternate beverage if so prescribed by a licensed physician.[47] If the CE does not offer an acceptable milk substitute for children without disabilities, the child has to take the fluid milk for the meal to be reimbursable if the CE does not use OVS.

Nutrient Analysis of Milk Substitutes

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

Recombined/Reconstituted Milk Dispensed from a Machine

CEs may serve recombined/reconstituted milk dispensed from a machine to meet the milk component requirement for lunch as long as the following criteria are met. The recombined or reconstituted milk (1) is combined with water so that it meets the requirements to be a *recombined milk* or *reconstituted milk*, (2) meets the nutritional requirements for fluid milk, and (3) meets the local and state standards for pasteurized fluid milk.

Water

Water is not an acceptable substitute for fluid milk. Only a nondairy beverage meeting the nutrient standards can be substituted for fluid milk.[48]

Smoothies

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

Crediting Smoothie Ingredients Chart		
Ingredient	**Minimum Crediting Amount**	**Component**
Pureed Fruit or 100% Fruit Juice (and/or Pureed Vegetables or 100% Vegetable Juice)	⅛ cup	Fruit Component, counted as juice
Flavored or Unflavored Fluid Milk Options	¼ cup	Milk Component
Dairy or Soy Yogurt	1 oz as .25 oz eq (about ¼ cup)	Grains Component (Meat/Meat Alternate Contributing to Grains Component)
All smoothie ingredients count toward the weekly dietary specifications.		

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

USDA recommends that CEs serve smoothies for only one meal per day. Menu planners also need to remember that smoothies count toward weekly juice, calorie, sodium, and fat totals. TDA encourages program operators to offer additional food components on the serving line when smoothies are offered.

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

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

[48] See *Administrator's Reference Manual (ARM), Section 25, Meal Accommodations* for additional information on this topic.

Components Allowed in Smoothies

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

Fruit and vegetables included in a smoothie may be fresh, frozen, canned, pureed, or juice.

- **Fruit and/or Vegetable Component.** To credit toward the fruit and/or vegetable component, the smoothie must contain the minimum creditable amount of ⅛ cup of (1) fresh, frozen, or canned fruits or vegetables from any subgroup or (2) be 100% fruit or vegetable juice, and/or a 100% juice blend of the fruit or vegetables;
  - Credited amounts of fruit/vegetable in a smoothie count as a juice serving. Juice offerings in smoothies are added to the weekly total of juice offered.
  - Pureed fruit/vegetables are measured by volume served amount.[49]
  - Blended vegetable puree or 100% juice made of vegetables from a single subgroup count toward the weekly offerings of that subgroup.
  - Blended vegetable puree or 100% juice made of vegetables from more than one subgroup count toward the weekly offering of the Additional vegetable subgroup.
  - Blended vegetable and fruit puree or 100% juice count as a fruit if fruit is the most predominant ingredient; as vegetables if vegetables are the most predominant ingredient. In this case, the vegetable juice may be counted toward the weekly offering of the Additional vegetable subgroup.
  - Dried beans or peas may credit as a fruit/vegetable juice in smoothies.
- **Milk Component.** To credit as a milk component, the smoothie must be made of unflavored or flavored fluid (not powdered) whole, reduced-fat (2 percent), low-fat (1 percent), or fat-free (skim) milk.
  - Smoothies do not have to contain the full 1 cup serving (8.0 fl oz) of milk. The minimum creditable amount of milk is ¼ cup.
  - Even if the smoothie contains 1 cup serving (8.0 fl oz) of milk, the CE must still offer a full serving (1 cup) of two allowable types of milk on the serving line.
- **Meat/Meat Alternate Serving Counted as the Grains Component.** To credit yogurt as a meat/meat alternate serving contributing to the grains component, the smoothie must contain the minimum creditable amount of yogurt—1 oz of yogurt credits as .25 oz eq of meat/meat alternate.
  - Soy or dairy yogurt may be credited.

Guidance about Smoothie Content and Crediting

All smoothies must be served under the following guidance:

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

- **Amount of Pureed Fruit or Vegetable.** Crediting pureed fruit or vegetables in a smoothie is determined by volume. Volume for pureed fruit or vegetables in a smoothie is based on the pureed amount of the ingredient. If the pureed ingredient is not listed in the *Food Buying Guide for Child Nutrition Programs*,[50] the program operator should determine the crediting amount based on the volume after pureeing the fruit or vegetable.

- **Concentrated Fruit Puree.** Smoothies with concentrated fruit puree can only be used in meeting the meal pattern requirements when they are reconstituted to the full-strength fruit puree. Without being reconstituted to the original strength, concentrated fruit puree is considered to be added sugar and cannot be credited toward the fruit/vegetable component.

- **Dietary and Herbal Supplements.** Smoothies with dietary and herbal supplements are not credible. However, smoothies made with juice that has been fortified with vitamins and minerals such as orange juice with calcium and Vitamin D added may credit.

- **Juice in Smoothies.** Juice in smoothies may be fortified with vitamins and minerals.

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

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

  For Example: An 8.0 oz smoothie beverage made from peach puree with the juice content labeled as "contains 50% juice" would credit as 4 fl oz or ½ cup of juice as long as the 4.0 fl oz or ½ cup of juice is 100% juice.

- **Offering Fluid Milk.** The milk in a smoothie must not be offered in place of a serving of fluid milk. Even if the smoothie contains a full cup of milk, the CE must still offer the milk component as a separate item on the serving line.

- **Other Items in Smoothies.** Grain items such as oatmeal or meat/meat alternates such as peanut butter do not contribute to the meal pattern requirements. However, all ingredients in smoothies must be counted toward the weekly limits on juice, calories, fat, and sodium.

Common Problems: Milk

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

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

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

   Solution: There is no substitute for milk; therefore, it can never be offered as a choice against another food or beverage.[51]

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

   Solution: If emergency conditions temporarily prevent a CE from having milk available, TDA may approve the service of breakfasts during the emergency period without milk. Contact TDA as soon as possible prior to the meal service.

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[50] Available at *www.fns.usda.gov/tn/food-buying-guide-school-meal-programs.*

[51] See *Administrator's Reference Manual (ARM), Section 25, Meal Accommodations*, located at *www.SquareMeals.org* for additional information regarding disabilities and milk substitute.

Traditional Foods

CEs that primarily serve Indian populations are allowed to accept the donation of traditional foods and serve traditional foods[52] as part of the school nutrition program. Traditional foods are defined as food that has traditionally been prepared and consumed by an Indian tribe which includes the following types of food:

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

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

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

Menu Substitutions

A substitution is made or required whenever a planned food item is not available to be served for any reason. When a substitution must be made, the new food item must (1) be within the same food component group and vegetable subgroup, if applicable, as the original item and

[52] The *Food Buying Guide for School Nutrition Programs* will be updated to allow the use of donated traditional foods in school nutrition programs that primarily serve Indian populations.

(2) match the daily and weekly contribution of the item that is replaced. CEs are required to document menu substitutions.[53]

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

For Example: Menu Substitution Examples

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

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

Example 2: The October 16 menu calls for orange wedges. The supplier informs the CE that they have no oranges to ship to the CE. The menu planner decides to substitute an additional pancake in order to offer four items—milk, toast, sausage, and pancakes.

Is this an appropriate substitution?—No, since the pancakes cannot be substituted to meet the fruit component requirement, and there is no other fruit component on the menu if a fruit item is not offered.

Substitution, Emergency Situation

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

Reimbursable Breakfast Requirements

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

- Grains
- Fruit (or Vegetable)
- Milk

Special Guidance for Reimbursable Meals

Combination Foods Containing More Than One Component

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

- A menued combination item may contain the full minimum serving of more than one food component—In this case, each component included in the combination item will credit toward a reimbursable meal.

  For Example: An egg sandwich contains 1.0 oz eq serving of grain and 1.0 oz eq serving of meat/meat alternate. In this case, the egg sandwich counts as 2.0 oz eq servings of grain.

- Several menued combination items may be added together to contain the full minimum servings of more than one food component—In this case, full minimum

[53] See *Administrator's Reference Manual (ARM), Section 30, Records Retention* for more detailed information on this topic.

servings of the included components are split across several combination foods, so the student must take the corresponding combination foods for a reimbursable meal.

Double Servings

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

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

Field Trips

Field trip meals will be viewed as part of the overall week's requirements just as if they were meals served at a CE site.[54]

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

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

Large Food Items

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

For Example: The menu planner designates that a 2.0 oz eq muffin may be counted as one food item or as two food items. The menu planner designates a large apple to credit as two ½ cup servings of fruit with each of the ½ cup servings counted as an individual food item.

Leftovers

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

Refusing an Item

Even if a CE is not using OVS, a student may refuse to take any food items. However, the meal is only reimbursable if the student takes enough of the components for the meal to qualify as reimbursable. If allowing OVS, the student must take three of the four components for a the meal to be reimbursable.

[NOTE: When a student refuses a food item, the student may be refusing a single component or may be refusing more than one component. As the student moves through the service line, he or she needs to know what components are in each menued item in order to choose a reimbursable meal. The cashier also needs to know what components are contained in each menued item in order to identify a reimbursable meal.[55]]

The CE does have additional discretion in how to handle a situation when a student refuses an item. The following guidance describes a CE's options:

- CEs are not required to offer another food item should a student refuse one of the food items in the meal.

[54] See *Administrator's Reference Manual (ARM), Section 21, Meal Service* for additional information on this topic.
[55] See the *Breakfast Menu Planning* subsection in this section for additional information on food items, food components, and menu items.

- CEs may offer a student the option to purchase food items a la carte when food items taken do not make a reimbursable meal. Any student who has the money either in hand or in his/her account may purchase food a la carte. However, in these cases, serving staff must prevent the overt identification of the eligibility status of the students.

- CEs may allow the student to take the food for free and not claim the meal for reimbursement.

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

Seconds or Additional Servings

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

1. The student may be given the seconds or additional servings free of charge. Seconds and additional servings must count toward the weekly requirements, including dietary specifications. Though permissible, seconds or additional servings provided free of charge should **never be routinely planned or prepared** by a CE.
2. The student may be asked to pay for the additional servings a la carte. If the student is provided seconds or additional servings and pays for the extra serving as an a la carte purchase, the additional servings do not count toward the weekly dietary specifications for reimbursable meals.
3. Decline to provide seconds or additional servings.

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

Student Identification of a Reimbursable Meal

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

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

- **Signage**
  Signage, including menu boards, that communicates what food items must be taken for a reimbursable meal.

- **Labels, Pictures, or Symbols**
  Label, pictures, or symbols that indicate which items are required for a reimbursable meal posted in the serving area (such as on sneeze guard).[56]

- **Other Communications**
  Information about the requirements for a reimbursable meal (and specifically OVS) published in menus, newsletters, communications with parents, or updates posted on websites.

- **Field Trips**
  Signage is not required for field trips. However, if choices are offered in these situations, CEs need to implement a method to inform students that OVS is being used and what to select for a reimbursable meal.[57]

- **Other Service Options**
  When a CE uses other service options,[58] such as breakfast in the classroom (BIC), the CE needs to ensure that students are provided information about what items are required for a reimbursable meal. If choices are offered in these situations, CEs need to implement a method to inform students that OVS is being used and what to select for a reimbursable meal.

This includes information that allows students to select the correct quantities, including at least ½ cup of fruit or vegetables or a ½ cup combination of fruit and vegetables.

Fruit(s) and Vegetable(s) Servings for a Reimbursable Meal

For a meal to be reimbursable, a minimum reimbursable serving of fruit or vegetable must be portioned as follows:

½ cup fruit(s)*	or	½ cup vegetable(s)*	or	½ cup combination* of ¼ cup fruit(s) and ¼ cup vegetable(s)

* The minimum credible size portion—when combining different types of fruits or vegetables to achieve a minimum serving portion size—is ⅛ cup of each fruit (or vegetable).

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

For Example: A student is served a minimum credible size portion of apples—⅛ cup. Unless the student takes an additional portion(s) of another fruit (or vegetable) so that a combined portion size of at least ½ cup is taken, the ⅛ cup of apples does not provide the minimum fruit (or vegetable) component for a reimbursable meal.)

[56] USDA provides examples of strategies to promote student identification of reimbursable meals at *www.choosemyplate.gov*.
[57] See *Administrator's Reference Manual (ARM), Section 21, Meal Service* for additional information on this topic.
[58] See *Administrator's Reference Manual (ARM), Section 21, Meal Service* for additional information on service options.

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

Options for Meeting the Breakfast Requirement for a Half (½) Cup of Fruit (or Vegetable) Component Chart[59]			
Option 1	½ cup fruit		
Option 2	½ cup vegetable		
Option 3	¼ cup one fruit	+	¼ cup, another fruit
Option 4	¼ cup one fruit	+	¼ cup, one vegetable
Option 5	¼ cup one vegetable	+	¼ cup, another vegetable
* ⅛ cup is the minimum creditable amount for the fruit or vegetable component. Menu planners may also combine multiple ⅛ cup portions of different fruits or vegetables to reach the ½ cup serving—⅛ cup pears and ⅜ cup carrots equal ½ cup.			

The *Options for Meeting the Breakfast Requirement for a Half (½) Cup of Fruit Component Chart* provides an illustration of the options a CE has in providing the fruit component by serving or offering a single fruit (or vegetable) or mixed fruits and vegetables.

Grains Serving for a Reimbursable Meal

To meet the grains requirement for a reimbursable meal, the full minimum daily portion (1.0 oz eq) of grain must be taken.

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

However, CEs may serve grains in a variety of ways to provide the daily and weekly grain portion requirements as well as to offer the number of items needed for a reimbursable breakfast:

Counting Grains Based on How They Are Menued Chart		
Menu Item(s)	**Counts the Item(s) As**	**Oz Eq in Menued Item(s)**
Muffin Special	1 Food Item	1.0 oz eq
Super Muffin	1 Food Item	2.0 oz eq
Super Muffin (1/2 or whole)	2 Food Items	2.0 oz eq
Breakfast Sandwich	1 Food Item	1.0 oz eq grain and 1.0 oz eq meat/meat alternate
Breakfast Sandwich	2 Food Items	1.0 oz eq grain and 1.0 oz eq meat/meat alternate

[59] At lunch for high school students and at breakfast for all students, a student must take the full serving of either fruit or vegetable if the reimbursable meal is a fruit, a vegetable, and one other component.

Cereal with Toast	1 Food Item	.5 oz eq + .5 oz eq = 1.0 oz eq

These options give menu planners a variety of ways to offer grains to achieve the minimum and recommended maximum amounts[60] of grains for the week.

Milk Serving for a Reimbursable Meal

In order to count milk as one food component, 1 cup of fluid milk must be taken. CEs that do not offer an approved fluid milk substitute can offer both fluid milk and water; however, water does not substitute for fluid milk in determining a reimbursable meal.[61] A meal without fluid milk is reimbursable under OVS.

Smoothies with 1 cup of milk and with at least ½ cup of fruit/juice may count as 2 food items under OVS.

Offer versus Serve (OVS)

Under OVS, a student's meal to be reimbursable, the student must be offered four food items that contain the three food components; the student must take at least three food items, including a minimum ½ cup serving of the fruit component (or vegetable).

For a reimbursable meal	
Student must be offered	Student must choose
4 Food Items which contain 3 food components	3 food items including ½ cup of fruit or vegetable

OVS, Extra Food Items

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

Reimbursable Meal Determination

While a student may choose to take a smaller portion of any component, the smaller portion does not count toward a reimbursable meal with the exception of a minimum serving of fruit and/or vegetable.[62]

[60] See the *Grains Component of the Reimbursable Breakfast* subsection of this section for more information on flexibility in grain maximums for SY 2013–2014.

[61] See *Administrator's Reference Manual (ARM), Section 25, Meal Accommodations* for additional information on this topic.

[62] See the *Fruit (or Vegetable) Component of the Reimbursable Breakfast* subsection in this section for additional information.

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

How to Recognize a Reimbursable Meal Chart—OVS Breakfast					
Sample Meal Choices	**Three Components—Fruit, Grains, and Milk—in Four Food Items***				**Is the Meal Reimbursable?**
	Item 1	**Item 2**	**Item 3**	**Item 4**	Student must choose a total of 3 food items.
Choice 1	☑ **Fruit**	_____	_____	_____	**NO^**
Choice 2	☑ **Grain**	☑ **Grain**	☑ **Fruit**		**YES**
Choice 3	☑ **Fruit**	_____	☑ **Grain**	☑ **Milk**	**YES**
Choice 4	☑ **Vegetable**	☑ **Grain**	_____	☑ **Grain**	**YES**
Choice 5	_____	☑ **Fruit**	☑ **Milk**	_____	**NO+**
Choice 6	_____	☑ **Fruit~**	☑ **Vegetable~**	☑ **Grain**	**Yes~**

* Students must be offered the full portion but may take a minimum of a ½ cup of fruit or vegetables on a combination of fruit and vegetables for a reimbursable meal.

^ The student took only one food item, so the meal is not reimbursable.

\+ The student did not take three items, so the meal is not reimbursable.

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

Nutrient Standards

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

Breakfast Nutrient Standard Chart				
	Age/Grades K-5	**Age/Grades 6-8**	**Age/Grades 9-12**	**Age/Grades K-12**
Min-Max Calories (kcal)[h, i,]	350-500	400-550	450-600	450-500
Saturated Fat (% of total calories)[i]	< 10	< 10	< 10	< 10
Sodium Target 1 (mg)[i,]	≤540	≤ 600	≤ 640	≤ 540
Added Sugars	**Product-Based Limits** (beginning July 1, 2025) • Breakfast cereals: no more than 6 grams per dry ounce. • Yogurt: no more than 12 grams per 6 ounces (2 grams per ounce). • Flavored milk: no more than 10 grams per 8 fluid ounces or, for flavored milk sold as a competitive food for middle and high schools, 15 grams per 12 fluid ounces. **Weekly Limit** (beginning July 1, 2027) Less than 10% of calories across the week in addition to the product-based limits.			

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

[i] Discretionary sources of calories (such as solid fats) may be added to the meal pattern if within the specifications for calories, saturated fat, and sodium. Foods of minimal nutritional value are not allowed. Saturated fat from milk used to meet the fluid milk component requirements is excluded from the weekly dietary specification.

Calculating Dietary Specifications for the Week

CEs calculate the dietary specifications by averaging the daily calories, sodium, and saturated fat. The weekly average must fit within the specifications for calories, sodium, and saturated fat. CEs must use Child Nutrition (CN) Labels, Nutrition Fact Labels, and/or product formulation statements for each food item to perform these calculations.[63]

If the CE Serves All Students the Same Meal,

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

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

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

[63] See the *Administrator's Reference Manual (ARM), Section 23, Food Product Labeling* for detailed information on this topic.

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

To Determine Dietary Specifications,

Step 1:

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

Weekly Total for the Dietary Specification	÷	Number of Serving Days for the Week	=	Average Daily Amount for the Nutrient Standard

Step 2:

Repeat this calculation for each dietary specification.

Step 3:

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

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

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

If condiments or accompaniments are not pre-proportioned or pre-packaged for a designated menu item, the CE must include the dietary specifications for the average serving—that is dividing the total amount served by the number of servings taken.[64]

Calculation Condiment or Accompaniment Amount Chart

Average Portion Size

Total Amount for All Portions Served		Number of Servings		Average Accompaniment Portion Size
48 oz	÷	55	=	.818

After calculating the average portion size, the CE will determine the dietary specifications for the portion size and add this amount to the weekly dietary specification totals.[65]

Choice Among Various Condiments or Accompaniments for a Designated Menu Item

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

1. Calculate the average portion size for each condiment or accompaniment that is provided.
2. Determine the dietary specifications for each condiment or accompaniment.
3. Average the dietary specifications for all condiments or accompaniments.
4. Add the average to the weekly dietary specifications total. [66]

[64] See the *Administrator's Reference Manual (ARM), Section 22, Competitive Foods* for additional information related to accompaniments or condiments intended to be used with a beverage or food item that is sold.
[65] CEs must retain calculations records that demonstrate established averages with meal production records.
[66] CEs must retain calculations records that demonstrate established averages with meal production records.

Extra Items Served after the Point of Service

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

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

Calories

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

Saturated Fat

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

CEs may exclude saturated fat from **fluid dairy milk only**[67] when calculating the weekly average saturated fat requirement. However, fluid milk must still be included in the calculation of all other dietary specifications (including calories, sodium, and beginning July 1, 2027, added sugars).

Sodium

The level of sodium in breakfast meals offered to each age/grade group must average over the serving week to the sodium levels specified in the *Breakfast Nutrient Standard Chart*. However, beginning July 1, 2027, schools must implement a 10% reduction to the sodium limits listed in the chart.

Added Sugars

Additional sugars added to products are limited to the list below. These limits do not apply to sugars that may naturally occur in food and as such, do not apply to the total sugars in a product.

Product-Based Limits

Beginning July 1, 2025, the following limits apply:

- **Breakfast cereals**: no more than 6 grams of added sugars per dry ounce.
- **Yogurt**: no more than 12 grams of added sugars per 6 ounces (2 grams of added sugars per ounce).
- **Flavored milk**: no more than 10 grams of added sugars per 8 fluid ounces or, for flavored milk sold as a competitive food for middle and high schools, 15 grams of added sugars per 12 fluid ounces.

[67] Only milk used to meet the fluid milk component requirements may be excluded from the weekly dietary specifications. Nondairy milk substitutes and milk used in recipes do not qualify for this exemption.

Weekly Limit

Beginning July 1, 2027, total added sugars are limited to less than 10 percent of calories across the week in addition to the product-based limits.

Nutrition Goals

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

Nutrient Analysis of Meals

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

- The nutrient analysis must be conducted for all food items that are offered on each serving line.
- CEs may use any software program to conduct a nutrient analysis. However, if the CE uses SNP program funds to purchase nutrient analysis software, CEs must purchase USDA-approved nutrient analysis software. A list of USDA-approved nutrient analysis software is available at *www.fns.usda.gov/tn/usda-approved-nutrient-analysis-software*.[68]
- CEs may use the worksheets available for submitting menus to achieve certification of meal pattern compliance to do a simplified nutrient assessment of menus.[69]

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

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

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

The nutrient analysis must include the following information:

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

These are the nutrients that are monitored by TDA. These nutrients will be compared to the required dietary specifications for calories (minimum and maximum levels), sodium, and saturated fat.

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

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

[69] Forms available at *www.SquareMeals.org*.

Weighted Average Serving

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

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

Determining Planned Servings for Weighted Averages

The nutrient analysis software system should perform the following tasks:

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

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

Sample Estimate of Number Servings Needed Chart
(Based on Previous Serving Records)

Meal Choice	Menu	Previous Number of Portions Served
Select One	Pancakes	600
	Toast	100
	Muffin	200
Select One	Apples	875
	Oranges	325
	Carrots	350
Select One	Applesauce	350
	Pears	250
	Orange Juice	150
Select One	Nonfat Unflavored Milk	150
	1% Unflavored Milk	700
	Nonfat Chocolate Milk	50

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

Processed Foods

When processed foods are used in menu planning, the nutrient analysis of these products either must be in the National Nutrient Database for Child Nutrition Programs or entered into the CE's local database. The nutrient analysis of the actual product must be used. CEs may obtain this information from the USDA's Child Nutrition (CN) label (CN Label) or manufacturer's product analysis sheet or a product formulation statement.

For more information on project labeling and manufacturer-created nutritional information sources, see the *Administrator's Reference Manual (ARM), Section 23, Food Product Labeling*.

Standardized Recipes and Preparation Techniques

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

Standardized recipes developed by USDA are in the Child Nutrition Database. Examples of standardized recipes are included in the *USDA Quantity Recipes for Schools and the New School Lunch and Breakfast Recipes…A Tool Kit for Healthy School Meals*.[70] The ESC Child Nutrition staff has copies of these resources. CEs may also use local or state standardized recipes. If a CE uses its own recipes, the recipes must be added to its local database of recipes.

Recipes for Salad or Theme Bars

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

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

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

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

1. Determine the serving size.
2. Determine the number of servings the recipe produces.
3. Determine the amount of each food ingredient in the recipe.
    - Measure the amount of each ingredient placed on the salad or theme bar on a typical day.
    - Measure the amount of each ingredient leftover on the salad or theme bar at the end of the meal service.
    - Subtract the amount leftover from the amount placed on the salad or theme bar for each ingredient to determine the amount of each ingredient to enter for the recipe.

    or

    - Measure the amount of each ingredient placed on the salad or theme bar over the course of a week.

[70] This resource and other recipe resources are available at *www.nutrition.gov/topics/shopping-cooking-and-food-safety/recipe-collection.*

- Measure the amount of each ingredient leftover on the salad or theme bar at the end of each day and add all the amounts for a total for the week.
- Subtract the amount leftover from the amount placed on the salad or theme bar for each ingredient to determine the amount of each ingredient needed for the week.
- Divide the remaining amount by the number of days in the serving week and use that average amount to determine a daily recipe.

Minimize Plate Waste

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

TDA

SquareMeals Website, Boost Meal Appeal—www.SquareMeals.org

USDA

Fruits and Vegetables Galore: Helping Kids Eat More—https://www.fns.usda.gov/tn/fruits-vegetables-galore-helping-kids-eat-more

Kid-Friendly Veggies and Fruits—www.choosemyplate.gov/ten-tips-kid-friendly-veggies-and-fruits

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

Water Availability During Meal Service

CEs participating in SBP are required to make potable water available to students at no charge in the place where breakfast meals are served during the meal service if breakfast is served in a cafeteria or centralized location. It is recommended, but not required, when breakfast is served in the classroom or other non-cafeteria location. There are a variety of ways that sites can implement this requirement.

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

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

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

While potable water is required to be made available to students, it is not considered part of the reimbursable meal. Students are not required to take water. If a CE sells bottled water, the CE must let students know that they may obtain water without a cost.[71]

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

[71] See the *Milk Component* and *Fruit Component* subsections in this section for additional information on beverages served.

Location of and Access to Water

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

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

Water Fountain

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

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

Cups for Water

The CE must provide cups for students to get the water at no cost if the water is provided in a bulk container (i.e., a five-gallon dispenser).

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

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

Reasonable Costs of Providing Water

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

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

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

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

necessary, reasonable, and allocable) and meet the specific needs of the CE.

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

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

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

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

Providing Potable Water in Other School Nutrition Programs

Seamless Summer Option (SSO)

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

Afterschool Care Snack Program (ASCP)

Potable water is recommended during meal service at an ASCP.

Water Dispensers, Food Safety

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

Meal Pattern Resources

TDA Resources

Meal Appeal for School Nutrition Programs

The meal appeal initiative for NSLP consists of easy-to-use information and resources that provide child nutrition professionals inspiration and tools to create healthy meals that look appealing, taste great, and comply with school nutrition guidelines.

- The Meal Appeal Toolkit and training is available at *www.SquareMeals.org*
- To share quick tips, ideas or resources for how to boost meal appeal, email *MealAppeal@TexasAgriculture.gov*.
- CE's ESC child nutrition specialist

SquareMeals Website

TDA has developed the numerous resources to assist CEs in implementing the NSLP and SBP meal patterns that are available at *www.SquareMeals.org* (NSLP Meal Appeal, Meal Pattern Support tabs). Resources include:

- Texas Recipe Development
- TDA's USDA Foods Recipe Suggestion Book
- Menu Planner for Schools

TDA Forms

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

The following forms are available at *www.SquareMeals.org*

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

USDA Resources

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

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

The Institute of Child Nutrition (ICN)[72] also provides numerous online training materials and information materials[73]

Available at *www.theicn.org*.

Food Production Records

The CE must keep complete and accurate food production documentation, including food production records, menus, records indicating food substitutions, invoices, or receipts for food product purchases, and meal pattern contribution documentation for the meals they produce.

[72] Formerly National Food Service Management Institute (NFSMI)
[73] ICN's materials are not regulatory

Food production documentation demonstrates that the meals served and claimed met meal pattern requirements and are, therefore, reimbursable.[74]

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

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

CEs should use the following guidance in maintaining production records:

- CEs should keep in mind that this requirement includes all breakfasts, including theme bars, quick lines, sack meals, etc.
- These records must show how the meals offered contribute to the required food components and food quantities for each age/grade group every day, including, but not limited to,
  - food item replaced,
  - substituted food item, and
  - reason for the substitution.
- Any meal claimed for reimbursement must be supported by a food production documentation.
- When recording the amount of prepared food on a food production record, CEs should record amounts by purchased unit/container size. These reporting units are also used in the *Child Nutrition Program Food Buying Guide (FBG)*[75] The Shopping List function in the web-based (or app) FBG can also be used to quickly determine the number of servings in a unit/container.

  For Example: If a CE is planning to prepare 310 one oz eq servings of sausage, the CE will report the total amount prepared as 3 cases@96/case +12. The sausage patties come 96 to the case.
- When recording the amount of leftover food on a food production record, CEs may record amounts by number of remaining servings.

Planned, Offered, and Selected/Served

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

- **Planned**. A planned menu is what the menu planner intends to offer or serve to students. It represents the CE's calculation of the items that will need to be prepared for a school's usual average daily participation (ADP). Ideally, the planned and the offered or served meals are the same.
- **Offered**. An offered menu is what is actually prepared and set out on the serving lines for students to take. Offered or served menus may differ from *planned* menus when there are unexpected circumstances.

  For Example: A planned food item was not received from the distributor, and the menu planner had to offer a different food item.

[74] See *Administrator's Reference Manual (ARM), Section 30, Records Retention* and *Section 20, Counting & Claiming* for additional information on these topics.
[75] Available at *https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs*

- **Selected or Served.** Selected or served refers to the foods that were actually served to or selected by students. Menu planners should use selected or served food item data to inform future menu planning and reduce food waste, so the school does not offer items that students do not select. Production records should be updated to indicate actual selected or served food items after the meal service so that production records reflect serving trends.

Records Retention

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

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

Information Box 3

Records Retention

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

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

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

Compliance

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

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

- Not meeting the meal pattern requirements
- Not meeting food quantity requirements
- Not meeting nutrition standards
- Inadequate or unavailable documentation[76]

[76] See *Administrator's Reference Manual (ARM), Section 24, Food Product Documentation* for additional information on this topic.