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To: Superintendents
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Subject: School Breakfast Program Full Implementation For School Year 2014-15
Questions and Answers

The attached Questions & Answers (QAs) provide guidance on the meal patterns and dietary specifications for meals offered under the School Breakfast Program (SBP). The meal requirements for the SBP were established by the final rule *Nutrition Standards in the National School Lunch and School Breakfast Programs* (7 CFR 2494, January 13, 2011), which was issued in conformance with the Healthy, Hunger-Free Kids Act of 2010.

Full implementation of the new school breakfast meal requirements begins in School Year (SY) 2014-2015. The SBP meal requirements were phased-in over multiple years; this memorandum addresses the final requirements resulting in full implementation of the School Breakfast Meal Pattern effective July 1, 2014 (SY 2014-2015).

Overview of School Breakfast Meal in SY 2014-2015

In SY 2014-2015, all schools in the SBP must plan to offer the three required food components (fruits, grains, and fluid milk) in the daily and weekly quantities specified in the meal pattern established by the final rule. The daily breakfast must consist of at least: 1 cup of fruits (only 50% of which may be 100% juice), 1 ounce equivalent (oz eq) of whole grain-rich grains, and 1 cup of milk (unflavored/flavored fat-free milk or unflavored low-fat milk). Additional whole grain-rich grains must be offered over the course of the week to meet the minimum weekly grains requirement for each age-grade group. All grains offered with the school meals must be whole grain-rich products.

The Target 1 sodium restriction for school meals will be effective in SY 2014-2015; therefore, the breakfast offered on average over the course of the week must not exceed the sodium Target 1 established for each age-grade group. There are no changes to the other dietary specifications. The calorie ranges for each age-grade group, and the restrictions on saturated fat (less than 10 percent of calories) and trans fat (zero grams trans fat per serving) remain in effect. Please note the specifications for sodium, calories, and saturated fat apply to breakfasts offered on average over the course of the week, and do not apply to each individual meal or per student.

As a reminder, there are three age-grade groups (K-5, 6-8 and 9-12) that must be used for menu planning. However, schools may offer the same breakfast to all students (K-

12) provided that it contains the minimum food quantities required for each age-grade group and does not exceed the dietary specifications of any group.

More details about the meal requirements that must be followed in the SBP in SY 2014-2015 are provided below:

Fruits

- Schools must offer a minimum of 1 cup of fruits daily to all age-grade groups (a breakfast meal must contain at least ½ cup fruit for meal reimbursement).
- More fruits may be offered if the calorie level in the average breakfast offered over the week is within the calorie range established in the meal pattern for each age-grade group.
- Schools may offer vegetables in place of fruits. The first two cups per week of any such substitution must be from the following subgroups: dark green, red/orange, beans/peas, or “Other vegetables” (as defined in 7 CFR 210.10(c)(2)(iii)).
- Full-strength juice may be offered to meet up to one-half of the weekly fruit requirement.
- Dried fruit may be offered; it credits for double the amount offered. For example, ¼ cup of raisins credits as ½ cup of fruit.
- Under Offer versus Serve (OVS), students must select at least ½ cup of fruits (or substituted vegetables) to have a reimbursable meal.

Grains

- All grains offered must be whole grain-rich products that conform to FNS guidance at <http://www.fns.usda.gov/tn/whole-grain-resource>.
- For all grade groups, schools must offer at least 1 oz eq of grains daily.
- The weekly grains requirement varies by age-grade group: 7-10 oz eq for grades K-5, 8-10 oz eq for grades 6-8, and 9-10 oz eq for grades 9-12. If serving a K-12 menu, the minimum grains would have to be 9 oz eq to meet the minimum 9-12 age-grade group. (Note: These weekly grains range serves as a guide to help schools plan age-appropriate meals and meet dietary specifications requirements. Exceeding the weekly grains range is not a violation of the meal pattern under the administrative review.)
- Schools may offer an optional meat/meat alternate to meet part of the grains component after the minimum daily grains requirement (1 oz eq) is offered in the menu or planned breakfast. (A serving of 1 oz eq of meat/meat alternate may credit as 1 oz eq of grains.)
- Alternately, a school may offer a meat/meat alternate as an extra food and not credit it toward the grains component. However, extra foods must be included when menus are assessed for compliance with calories, saturated fat, sodium, and trans fat requirements.

Fluid Milk

- Schools must offer only fat-free (unflavored or flavored) or low-fat (unflavored) milk.
- For all age-grade groups, schools must offer at least 1 cup of milk daily.

- A variety (at least two options) of milk must be offered.

OVS at Breakfast

A *food component* is one of three food groups that comprise reimbursable breakfasts. These are: fruits (or vegetables as substitute); grains (with optional meat/meat alternate); and fluid milk.

A *food item* is a specific food offered within the three food components. For the purposes of OVS, a school must offer at least four food items that meet the required food components. Under OVS, the student must select three food items, including at least ½ cup of fruits, to have a reimbursable breakfast in SY 2014-2015.

Sodium Target 1

Beginning SY 2014-2015, the sodium content of the average breakfast offered during the week must be as follows:

For grades K-5	540 mg or less
For grades 6-8	600 mg or less
For grades 9-12	640 mg or less

We appreciate all you do for the School Meal Programs and look forward to our continued collaboration to improve the nutrition of New York's children. If you have any questions regarding the 2014-15 full implementation of the School Breakfast Program meal pattern changes, please contact your Child Nutrition Program Representative.

The SBP Meal Requirements

Grains Component

1. What grains may be offered?

Beginning SY 2014-2015, all grains offered to meet the grains component of the NSLP and SBP must be whole grain-rich. Allowable grains are identified in The Whole Grains Resource at <http://www.fns.usda.gov/tn/whole-grain-resource>. Grain items made with refined grains that do not meet the whole grain-rich criteria are not creditable toward the grains component; all grains offered count toward the dietary specifications (calories, sodium, saturated fat, trans fat), even if they are not credited toward the grains component (i.e., extra foods).

2. How much of the grains component must a school offer at breakfast?

Schools must offer at least 1 ounce equivalent (oz eq) of grains daily to children in all grades. The total amount of grains offered over the week must meet at least the minimum weekly requirement established for each age-grade group: 7 oz eq for grades K-5, 8 oz eq for grades 6-8, and 9 oz eq for grades 9-12. The menu planner should use the weekly maximum levels as a guide to offer age-appropriate meals and meet dietary specifications requirements.

3. Can menu planners still offer traditional grits when the whole grain-rich requirement goes into effect?

Whole grain-rich grits, which are currently commercially available, are creditable toward the daily and weekly grains requirements. However, traditional grits may be offered as an extra food, but may not be credited toward the grains requirements beginning SY 2014-2015.

4. May schools offer a meat/meat alternate in the SBP?

Yes. Schools may offer a meat/meat alternate at breakfast, even though the new SBP meal pattern does not require a meat/meat alternate component. A meat/meat alternate can be offered at breakfast as long as a minimum of at least 1 oz eq of grains is also offered daily. Schools that wish to offer a meat/meat alternate have two options for incorporating meats/meat alternates into menus:

- Schools may offer a meat/meat alternate that credits toward the grains requirement, provided they offer at least 1 oz eq of grains daily. Under this flexible option, the meat/meat alternate would count toward the weekly grains requirement and the dietary specifications. The operator receives credit for the meat/meat alternate under the grains component.
- Alternately, schools may serve a meat/meat alternate as an extra food and not count it toward the weekly grains requirement. The extra meat/meat alternate must fit within the weekly dietary specifications (calories, saturated and *trans* fats, and sodium), and the operator must continue to offer a sufficient amount of grains daily to meet the weekly grains requirement. Under this option, the meat/meat alternate does not change the other required components in the SBP meal pattern.

The above options allow menu planning flexibility while promoting the consumption of whole grain-rich foods consistent with the Dietary Guidelines for Americans.

5. Does a large grain food item (e.g., 2 oz eq muffin) count as more than one item at breakfast?

The menu planner has discretion to offer a 2 oz eq. muffin as one or two breakfast items. It would be acceptable for the menu planner to offer the large muffin as two food items, 1 cup of fruits, and fluid milk. In such scenario, however, only the milk could be declined under OVS; the students would have to select the muffin and the fruit (at least ½ cup) to have a reimbursable meal under OVS.

6. Does a combination food consisting of 1 oz eq grains and 1 oz eq meat/meat alternate (such as a breakfast sandwich) count as one or two items for purposes of OVS at breakfast?

Menu planners have two options for counting a combination food consisting of meat/meat alternate and grains, such as an egg sandwich.

- One option is to count the combination food (e.g., egg sandwich) as two items under the grains component. It provides at least 1 oz eq of grains (the minimum daily requirement for the grains component) plus an additional 1 oz eq of meat/meat alternate which is also counted toward the grains requirement. As noted above, a 2 oz eq grain is considered two items for purposes of OVS. Therefore, it is acceptable under OVS to offer a combination food that counts as two grain items, plus the full required amounts of fruit and milk.
- The other option for the menu planner is to offer a meat/meat alternate in the combination food and not count it toward the grains component. In this case, the meat/meat alternate is an extra and does not count as an item for purposes of OVS. The 1 oz eq of grains in the combination food does count as one grains item. Therefore, the egg sandwich as a whole in this scenario counts as one grains item. Three additional items --including fruit (or vegetable) and milk -- must be offered to have OVS.

7. At breakfast, how does the whole grain-rich requirement apply if a menu planner is crediting Meat/Meat Alternates toward the Grains component?

The whole grain-rich requirement applies only to grain-based foods, and *not* Meat/Meat Alternates crediting toward the Grains component. For example, if a menu planner offers 6 oz eq grains and 3 oz eq meats/meat alternates to meet the weekly minimum requirement of 9 oz eq grains in grades 9-12, only the 6 oz eq of grains must be whole grain-rich.

8. What popular meat alternates may be offered in the SBP to supplement the required grains component?

Yogurt (dairy and soy), cheese, and nuts are examples of meat alternates that may be offered to supplement the daily grains offering. Yogurt in smoothies prepared in-house may also be credited as a meat alternate in place of the grains component. (Note: Because there

is no meat/meat alternate requirement in the SBP, nuts are not limited to the 50 percent requirement specified in the NSLP.)

9. Does the flexibility for Grains Maximums apply to the SBP meal pattern?

Yes. The flexibility applies to the weekly grains maximums in the SBP meal pattern. Menus that offer the minimum required grains will be considered compliant during an administrative review. However, menu planners should use the weekly maximum levels as a guide to offer age-appropriate meals and meet dietary specifications requirements.

Fruits Component

10. How much fruit must a school offer at breakfast?

Schools must offer 1 cup of fruit daily to children in grades K-12 beginning SY 2014-2015.

11. Is a student required to take fruit at breakfast under OVS?

Yes. Beginning SY 2014-2015, the reimbursable meal selected by a student under OVS must include at least ½ cup of fruit (or substitute vegetable), or ½ cup of juice.

12. Is there a limit on the amount of juice that may be offered at breakfast?

Yes. The total weekly fruit and/or vegetable juice offerings may not exceed one-half of the total fruits (or vegetables, if substituted for fruits) offered over the week.

13. May schools offer smoothies at breakfast?

Yes. For smoothies prepared in-house, the fruit and milk ingredients count toward the required fruit and milk components. Yogurt offered as a meat alternate in smoothies prepared in-house may be credited toward the grains component of the breakfast meal pattern (see question 8 in the Grains Component section above). The 50 percent juice limit applies to the fruit juice/puree in smoothies. See SP 10-2014, *Smoothies Offered in Child Nutrition Programs*, for additional information: <http://www.fns.usda.gov/school-meals/nutrition-standards-school-meals>.

Milk Component

14. Must milk be offered at breakfast when the meal includes a smoothie?

Yes. Although the milk quantity included in smoothies prepared in-house counts toward the required milk component, two types of fluid milk must be offered separately to meet the milk component variety requirement. The service of smoothies must not compromise student consumption of fluid milk. See memorandum SP 10-2014, *Smoothies Offered in Child*

Nutrition Programs. See <http://www.fns.usda.gov/school-meals/nutrition-standards-school-meals>.

Offer vs. Serve

15. How is OVS implemented in the SBP?

OVS remains optional for all age-grade groups in the SBP, and schools using OVS must offer at least four breakfast items in the amounts specified in the new meal pattern. A student must select at least three breakfast items under OVS. The reimbursable breakfast selected by a student under OVS must include at least ½ cup of fruits (or substitute vegetables). A student is not required to take milk under OVS.

16. May a school using OVS offer two different 1 oz eq grain items at breakfast, and allow students to take two of the same grain items and count them as two items for purposes of OVS?

Yes. This is acceptable if the menu planner chooses to do so. For example, a menu may offer 1 cup milk and 1 cup fruit, effective SY 2014-2015, plus two grains: cereal (1 oz eq) and toast (1 oz eq). The student could select at least ½ cup of fruit and two pieces of toast and this would count as the three items required for a reimbursable meal under OVS. The menu planner has discretion whether or not to allow students to select duplicate items.

17. Can pre-bagged meals be offered when breakfast is offered in the classroom and OVS is in place?

Yes. If a school participates in OVS at breakfast and offers breakfasts where some or all of the components are bundled together, the operator should attempt to the extent possible to offer choices (such as a fruit basket) aside from the pre-bagged items. However, there is no requirement that all possible combinations of choices be made available to the student.

18. Why are schools required to offer 1 cup of fruit if students only need to select ½ cup of fruit for a reimbursable meal under OVS?

Schools are required to plan and offer at least one cup of fruit to each grade group. If, upon a review of production records, schools find that students are only selecting ½ cup of fruit, menu planners should adjust the fruit (or vegetable) offerings so students are enticed to select more fruits. Offering popular choices such as smoothies may encourage student consumption of fruits. FNS recently issued guidance on crediting fruit in smoothies. For more information, please visit <http://www.fns.usda.gov/school-meals/nutrition-standards-school-meals>.

There are many resources available to schools to help encourage students to select and consume more fruits. Team Nutrition (TN) has activities and recipes to help promote fruits and vegetables to school-aged children. Please visit <http://healthymeals.nal.usda.gov/resource-library/fruit-and-vegetable-resources/fruit-and-vegetable-resources-school-aged-children>. The Healthy Meals Resource System also has an assortment of State-developed best practice materials to promote fruits in school meals.

See <http://healthymeals.nal.usda.gov/best-practices>. Cornell University's BEN Center offers *Smarter Lunchrooms* strategies to make healthful foods more appealing to children. See <http://smarterlunchrooms.org/resources>.

Sodium

19. Is each daily breakfast menu, or each meal a student selects, required to meet the sodium Target 1?

Sodium is a weekly requirement and, therefore, does not apply to daily menus or meals selected by individual students. Individual meal(s) offered on one or more day(s) may exceed the sodium target. However, the average sodium content of meals offered over the week must be at, or below, the sodium Target 1.

20. What resources are available to schools to reduce the sodium content of breakfasts?

FNS has developed resources to help plan meals with lower sodium content. TN and the National Food Service Management Institute (NFSMI) both provide guidance for reducing sodium.

- The TN Healthy Meals Resource System has a webpage with resources to help menu planners lower sodium in school meals; see <http://healthymeals.nal.usda.gov/menu-planning/sodium-reduction>. The Fact Sheets for Healthier School Meals also offer tips on reducing sodium; see: http://www.fns.usda.gov/sites/default/files/jtf_resources.pdf.
- The NFSMI has tips for reducing sodium in menus; see <http://www.nfsmi.org/documentlibraryfiles/PDF/20120102035310.pdf>.

In addition, USDA Foods has low-sodium products available to schools. See the list of USDA Foods at <http://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets>.

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