New Meal Pattern Training
Questions & Answers

NOTE: 11/2012 revision to Grains section Q. 3

Fruits

1. Is it acceptable for a menu to state "choice of fruit" instead of specifically listing the fruit to be served that day? Doing this allows me to use fresh fruit that is on sale and decide each week what I will serve. Does the type of fruit offered need to be specified on a menu? (i.e. Can I merely list “fresh fruit”)?
   Stating “choice of fresh fruit” or “Assorted fresh fruit” on the menu is fine as long as the specific fruit(s) offered each day to students and quantity is documented on the daily food production record.

2. Will jello made with 100% fruit juice be allowed to count as a fruit serving under the new guidelines?
   No. Foods that are “hidden” within the food product and not obviously apparent to students are not allowable. In addition, jello contains added sugar.

3. If assorted juices are offered every day does each variety count as a separate offering?
   An assortment of juices would count as one juice offering unless children are allowed to take more than one. Therefore, if a variety of juice was offered every day, juice would contribute 5 fruit components throughout the week.

4. If the school (grade 9-12) offered ½ cup juice and ½ cup of fruit, may I require the student to take one of each? Can they take two juices or two fruits or more than the requirements? Example: 2 juice, ½ cup each and ½ cup of fruit.
   Since 9-12th grades must implement Offer vs. Serve (OVS), the student only needs to take ½ cup fruit or vegetable but can take the full (1 cup) component. In that case, the school can stipulate that students can take 2 fruit but only one can be juice.

5. Are oranges and orange juice separate items now?
   Yes. Fruit of the same origin (i.e. orange and orange juice, apple and apple juice, grapes and grape juice, etc.) can be offered at the same meal and counted as two separate fruit offerings.

6. Would two apple juices count as a one (1) cup serving of apples?
   Two, four ounce portions of apple juice would contribute 1 cup towards the fruit component.
7. If the CN label states 100% fruit juice and that each unit/portion = ½ cup fruit serving, can we rely on this label?
   Yes, you can rely on the information stated on CN labels.

**Vegetables**

1. Can students take more than ½ cup of fruit or vegetable?
   Yes, and under serve only, the student is required to take the full component.

2. Under OVS, do you merely have to offer fruits and vegetables or must the students take a certain amount of them?
   You must offer both fruits and vegetables with every reimbursable meal in portion specific sizes for the age/grade groups. Under OVS, the student must take at least ½ cup fruit or ½ cup vegetable, or ½ cup combination of fruit and vegetable for the meal to be reimbursable.

3. Does offering tossed salad that is ½ iceberg lettuce ½ romaine lettuce offered self-serve, unlimited portion size meet the dark green requirement?
   The romaine can count toward the dark green requirement. Raw leafy greens such as romaine credit at ½ the volume, so 1 cup of romaine would credit as ½ cup dark green. In a self-serve scenario, a recipe would be necessary to determine the exact amount of creditable components towards the vegetable category and dark green sub-category.

4. Does salsa count as a red vegetable?
   Yes. See the USDA Food Buying Guide or manufacturer’s information for the exact creditable amount.

5. Is there a maximum restriction for vegetables?
   No.

6. Does tomato soup count as a red vegetable?
   Yes. See the USDA Food Buying Guide, manufacturer’s information or CN Label for creditable amount.

7. If the minimum creditable amount of fruit is 1/8 c. but the requirement is ½ cup, is it OK for a student to take 1/8 cup?
   The minimum portion size that you can offer that will credit toward the fruit component is 1/8 cup. The student must take an additional 3/8 cup of fruit and/or vegetable to meet the ½ cup requirement under OVS.

8. Are there changes to printing on menus with regard to the specificity of the fruit and vegetable requirements?
   They (fruits and vegetables) are separate components that should be listed separately.
9. **May students take two, ½ cup portions of vegetables at the elementary level (k-5)?**
   You must offer at least ¾ cup vegetable daily to elementary students (K-5). The student may take two, ½ cup portions.

10. **How much is needed to offer on a salad bar?**

11. **Does butter crunch lettuce count as a dark green vegetable?** Yes

12. **What vegetable sub-groups do snow peas/sugar peas fall under?** Both are categorized in the Other sub-group category. See the USDA Food Buying Guide and USDA Questions & Answers on the Final Rule, “Nutrition Standards in the National School Lunch and School Breakfast Programs”, Fruit & Vegetables section # 35 provides additional vegetable sub-group information which can be obtained at:

**Grains**

1. **Does a 1.9 ounce equivalent (oz. equ) grain serving get rounded down to 1.75 oz. equ equivalent or up to 2 oz. equ?**
   Grains are always rounded down to the nearest .25 oz.

2. **During SY 2012-13, ½ of the grains offered over the week must be whole grain rich. Is it half of the items or half of the weight?**
   Half of the items offered over the week must be whole grain rich.

3. **Can I serve white rice and still be compliant with the need to serve ½ my grains as whole grain rich? Can white rice be served half of the days of the week?**
   During SY 2012-13 and 2013-14, ½ of the grains offered at lunch during the week must be whole grain rich. Enriched grains that are not whole grain, such as enriched white rice may still be offered, as long as ½ of grains offered during the week are whole grain rich.
   During SY 2014-15, all grains offered at lunch must be whole grain rich. So white rice by itself will not be able to be offered, but white rice in a recipe where greater than 50% of the grains are whole grain is permitted (e.g. a recipe with 51% brown rice and 49% white rice).
   Rev. 11/2012
4. **Can breading (such as is on breaded chicken patties, breaded fish, etc.) be counted as bread?**
   During SY 2012-13, breading **may** be counted toward the required grain minimums and maximums. During SY 2013-14, breading **must** be counted toward the required minimums and maximums.

5. **Can we use the fiber content on the label to determine if a product is whole grain?**
   No. Fiber is not the same as whole grain. Fiber is found in whole grains, but is also in grains and other foods that are not whole grain.

6. **How can we offer PBJ daily at the elementary and meet the grain maximum?**
   The weekly maximum number of grains for K-5 is 9 oz. eq. So, if schools offer sandwiches with 2 oz. equ of grain every day, they will exceed the maximum. Schools may be able to offer PBJ sandwiches with 2 oz. equ grain up to 4 days per week, but must offer meals that only have one grain on the other day. A PBJ roll up on a small tortilla that counts as one grain may be a possible option.

7. **At pasta bars and salad bars where students can choose unlimited grains, how will this affect grain/meat maximums?**
   Signage must indicate what the **planned** serving for grains and meat/meat alternative are for reimbursable meal and cashiers are responsible for ensuring that students take appropriate quantities to meet the reimbursable meal requirements.
   Also USDA Questions & Answers on the Final Rule, “Nutrition Standards in the National School Lunch and School Breakfast Programs”, Grains #17 offers guidance for this type of service.

8. **Can you define the grain based “desserts”?**
   Grains that are considered ‘grain based desserts” are noted in Exhibit A with footnote 3 or 4. Grain based desserts include items such as graham crackers, animal crackers, cookies, pie crust, cake, brownies, breakfast/cereal bars etc. Exhibit A is attached to the following USDA memo: [http://www.fns.usda.gov/cnd/governance/Policy-Memos/2012/SP30-2012os.pdf](http://www.fns.usda.gov/cnd/governance/Policy-Memos/2012/SP30-2012os.pdf).

9. **What is the requirement of 16 grams of creditable grain ingredient in order to provide 1 oz. equivalent? Is that regardless of the weight of the roll?**
   Whole grains and enriched grains are considered creditable grains for the school meals program. Effective no later than the 2013-14 SY, grain products such as breads, rolls, etc. that contain 16 grams of whole grain and/or enriched grain meal or flour will count as 1 oz. equ of grain. Also, at least 50% of the grain weight of the product must be whole grain.
The easiest method is to use USDA chart (Exhibit A) which estimates ounce equivalents for most common commercially prepared products based on their product type and weight. However, using Exhibit A is dependent on all grains in the product being “creditable.”

10. Will the USDA be providing kid friendly recipes for grains?
   USDA is working on revising USDA recipes to include the New Meal Pattern components.

11. How can we meet and not exceed grain requirements when we offer 4 meal options at our high school? How do we count our breads for each meal and daily and weekly minimum and maximum if 4 grains are offered in different sizes?
   The minimum for grains for grades 9-12 is 10 oz. eq. The maximum is 12 oz. eq. Also, you must meet the daily minimum of 2 oz. equivalents of grains.

   If you offer more than one meal option:
   The meal that contains the least grains each day is your daily minimum. Make sure your daily minimum is 2 oz. eq. Add up your daily minimums to get your weekly minimum. Make sure your weekly minimum is at least 10.

   The meal that contains the most grains each day is your daily maximum. Add up your daily maximums to get your weekly maximums. Make sure your weekly maximum does not exceed 12.

   See New Meal Pattern Power Points (PEARS, Forms Download, Nutrition Standards for School Meals – Resources section) on Grains, for more information.

12. If a 3.2 oz. and 5.0 oz. roll has 16 grams of creditable grain, does each count as one bread?
   Yes, but it is not likely that a 5.0 ounce roll would have only 16 grams of creditable grain. In addition, while only the amount of creditable grains counts toward the grain component, all of the calories count toward the calorie minimum and maximum.

Meats

1. May we use Greek yogurt?
   Yes, it would credit the same as regular yogurt.

Milk

1. If I use a bulk milk dispenser is it okay if I offer 8 oz. but a student only takes 4 oz.?
   Under OVS, as the 4th component, it would be acceptable for a student to take less than the full component of milk.
Under OVS, as 3rd component and under serve only, it would not be acceptable to take less that the full component of milk (8 oz.) for the meal to count as a reimbursable meal.

2. **If students take two milks do I charge for the second? Must I?**
   Schools may choose to charge for the second milk according to your school’s a la carte pricing policy. If the school chooses not to charge, funding for the reimbursable meal cannot be used to pay for the second milk.

3. **Does there have to be a variety of flavors of milk?**
   Schools must provide a variety of milk (at least two types of milk). Milk fat content (i.e., low-fat, non-fat) and milk flavoring now both contribute to offering a variety of milk. However, schools do not have to offer a variety of milk flavors as long as at least two different fat levels of milk (non-fat and 1%) are offered. And vice versa, schools do not have to offer a variety of fat levels as long as two different flavors are offered.

**Nutrients**

1. **Is there a resource that lists calorie contents for foods? For instance, how many calories in 1/2 cup of carrots?**

2. **Are calories based on a planned menu?**
   Yes, calories are based on the menu items and amounts/portion sizes planned.

**Other**

1. **Where can I get a Food Buying Guide?**

2. **Where can I find the USDA Questions & Answers on the Final Rule, “Nutrition Standards in the National School Lunch and School Breakfast Programs”?**

3. **Can school districts with K-5 school and a 6-8 schools develop one menu to be used in both buildings?**
   No, unless one building houses K-8 students, then one K-8 menu can be developed for use for that building.
4. Is there a maximum amount of fruits and vegetables that I can serve a student?
   No, there are no maximum limits on fruits and vegetables provided the calorie limits are not exceeded.

5. How do you analyze unlimited fruits and veggies?
   Use a recipe to determine planned servings.

6. If a condiment bar is after the point of service do I have to count it?
   Yes.

7. Must RCCIs use Offer vs. Serve?
   See PDE and USDA memos on PEARs, Forms Download, Nutrition Standards in School Meals section PDE0711.

8. Does fruit, milk, and vegetable equal a reimbursable meal?
   Yes. Under OVS, students must select at least ½ cup of either the fruit or the vegetable component, or a ½ cup combination of both components (¼ cup fruits and ¼ cup vegetables), for a reimbursable meal. If a student selects only three components, and two of these three components are fruits and vegetables, the student may select ½ cup of either the fruit or vegetable, but then must select the full component of the other.

   For example, if a student in grades 9-12 selects just milk, fruit and vegetables, the student may take ½ cup of the vegetable but must take the full 1 cup offering of the fruit. However, if the student selects another full component, such as a grain or meat/meat alternate, the student may take a smaller portion of the fruit because the fruit is no longer being counted as the 3rd component in the reimbursable meal.

9. For various age groups can portions be made smaller without the need for a new menu to be displayed?
   The same menu items can be used for each age/grade group, however a separate “planning” menu with the different portion sizes for the age/grade groups should be developed to ensure each age/grade group menu meets the meal pattern requirements. If a school doesn’t use a “planning” menu that indicates quantities, this information will be documented on the production record.
   For parent purposes, one menu would be okay since it does not list portion sizes. However, K-5 menus do not usually look like grade 9-12 menus due to variety.

10. Will there be a new production sheet required?
    Production sheets are still required by regulations; however, we are evaluating a new format for producing production sheets.

11. Are there exceptions for students with special needs?
    The HHFKA does not change the requirement to serve students with special dietary needs.
12. When we cook from scratch, how do we know if we meet requirements?
   You can use your recipes to make sure portion sizes meet requirements. Scale a recipe to a
   single serving to determine creditable components.

13. Are the USDA Buying Guide requirements for ingredients or for the finished product?
   Finished product.

14. How do we access the Menu Planning Tool?
   The menu planning tool spreadsheets are posted on PEARS, Form Download under the
   Nutrition Standards for School Meals – Resources section.

15. Will PDE provide a template letter about the new regs that we can use to send to families?
   Yes, it is available on PEARS Form Download under the Nutrition Standards for School Meals –
   Resources section.

16. Can a hummus plate with lots of vegetable components be considered a meal with milk and
    fruit?
    The beans in the hummus can count toward the meat/meat alternate or vegetable
    (bean/legume sub-group) component. So, a hummus plate can be considered a meal if all
    other components are included in proper amounts.

17. What are the requirements for Pre-K?
   See USDA Questions & Answers on the Final Rule, “Nutrition Standards in the National
   School Lunch and School Breakfast Programs”, Miscellaneous section #2.

18. Can Barilla Plus count as a meat/meat alternative and/or serving of legumes?
    No.

19. How do we handle the issue when elementary students owe money? We normally give
    them a peanut butter jelly sandwich or cheese sandwich, but with the new maximum we
    cannot offer it daily.

    If the meal is being claimed as a reimbursable meal, a smaller grain for the sandwich could
    be. The other required components would need to be offered (dependent on OVS or serve
    only).
    If the meal is not being claimed for reimbursement, it does not need to meet the grain or
    new meal pattern requirements.

20. How do condiments contribute to the sodium restriction? How can this be monitored?
    They are to be included in the production records and they will be counted towards
    calories, saturated fat, and sodium.
21. If we offered 3-bean salad with at least 1/8 cup of kidney beans, would our weekly requirement be met if we served this salad four times a week? 
If counted as a vegetable each day, the weekly requirement to offer ½ cup bean/legume as a vegetable sub-category would be met.

22. What are the criteria for determining oz. equivalents for grains? 
See USDA memo on Grains on PEARs, Forms Download, Nutrition Standards in School Meals section, Grain Requirements SP30-2012, PDE704a and Grains-Exhibit A 2012-2013 & 2013-2014, PDE732.

23. Can edamame be counted toward legume/bean group for it is a soybean product? 
Yes, see the USDA Food Buying Guide.

24. Are we allowed to have salt and pepper available on a table for students? 
There is nothing that states you cannot, however, with the upcoming sodium restrictions beginning 2014-2015, we believe salt on student tables will be counted. Since sodium is an acquired taste, it is recommended that you begin to decrease sodium gradually to meet this section of the HHFKA come 2014-2015.

25. There are a lot of students in High School getting double meals. Also in the 5-6 grade building, I get written notes from parents who want their students to get double meals and double entrees. We, of course, charge these extra as a la carte, will this continue to be allowed? 
Second meals or second items are not part of the reimbursable meal and are to be charged as a la carte. It is important to remember that reimbursement for the reimbursable meal is intended to be directed for the cost of meeting the requirement of the meal, not additional items.

26. Our 5th and 6th graders are in the same class (charter school) and eat together. Will we be able to serve them the same food portions? 
Yes, if your school has students in grades K-6, you can use the meal pattern designed for K-8 buildings (using the overlap between K-5 and 6-8).

27. At the high school level, a student comes through and takes a hamburger on a bun (the bun = 1 1/2 grains), graham crackers (1/2 grain), and 1/2 c of fruit. Does the student have a full lunch? 
Yes, assuming the hamburger provides the 2 oz. meat/meat alternate requirement.
28. If the student only takes a hamburger patty (no bun), the graham cracker, and 1/2 c of fruit, is this a reimbursable lunch?  
No

Next Q & As

Will there be an exception to the guidelines for holiday meals and special celebrations?

Are we allowed to have salt and pepper available on a table for students?

There is nothing that states you cannot, however with the upcoming sodium restrictions it is recommended that you begin to decrease the sodium gradually until this part of the HHFKA is to be implemented in SY 2014-2015.
References/Comments

Money for districts for training.

We need a standard letter and press release from PDE created and sent to all PA directors ASAP. So that we can include this new information in the summer mailings to parents. They will be complaining we raised the lunch prices based on equity in reduced lunch and now we are decreasing size of proteins and limiting the # of servings per week by regulations.

A general consensus is that we would appreciate help visits, guidance visits, assistance, etc. instead of audits or reviews for this year. We would appreciate acknowledgement of good efforts.

Please provide menus that meet the new requirements so that every district does not have to “reinvent the wheel.” In addition, please provide a letter that can be sent to parents explaining why school meals are changing.
Spend extra money on a... Nutrition kids type program for all to use that are in the USDA programs. Since you are enforcing us to make these changes a “free” program like this would be great especially for the smaller schools that might not be able to afford such a program.

Invest money in:

Create basic menus so we are standardized. Not all directors are nutritionists and find it very difficult. Does anyone realize how much more time will be needed to prepare each detailed menus which takes us away from the other duties?

Posters that help us to post in our school cafeterias to explain the new look of school lunch.

The description food plates and foods could be magnetized. It would make it interchangeable.

Do a state sponsored:

   Elementary Menu week(s)

   Middle School week(s)

   High School week(s)

↑ idea where to funnel state $ resources

6-12 school RCCI meal difference

One room school house all go to school and eat together. Cannot separate could cause fights- MH issues

RCCI

Offer vs. Serve

Need to review our options

Signage

A poster that explains offer vs. serve on a 5 compartment lunch tray.

Dots on a lunch tray

Need simple, basic, easy for young children to understand. Something without words that will be easy for kindergarten students to understand.

Sample Menus
Our baker requests that PDE reach out to PA Preferred Manufacturers to help them “credit” their bread and roll items.

Dry Erase menu boards and skill signs.

The John Bennett materials would be great!

Please provide and sample letter to parents that can be posted on district websites explaining the changes that are mandated that we are making to the school lunch program. Ready for us to use by August 15\textsuperscript{th} of this year 2012. Thank you—Cary Hennigh of Schuylkill Valley

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August 29, 2012
rev. 11/2012