



DATE: March 11, 2013

MEMO CODE: SP 28-2013

SUBJECT: Questions & Answers on the School Breakfast Program Meal Pattern in School Year 2013-14

TO: Regional Directors  
Special Nutrition Programs  
All Regions

State Directors  
Child Nutrition Programs  
All States

Attached are Questions & Answers (QAs) on the final rule to update the meal patterns and nutrition requirements for meals offered under the School Breakfast Program (SBP), as required by the Healthy, Hunger-Free Kids Act of 2010. As the breakfast meal pattern requirements are being phased-in over multiple years, this memorandum also provides a brief overview of the breakfast meal pattern for School Year (SY) 2013-14 *only*.

Please refer to Food and Nutrition Service (FNS) memorandum SP 10-2012 (<http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2012/SP10-2012ar6.pdf>) for QAs specifically related to the National School Lunch Program meal pattern, or general questions applicable to both breakfast and lunch.

### **Overview of Breakfast Meal Pattern in SY 2013-14**

#### ***General Requirements***

In SY 2013-2014 all schools must use a food based menu planning approach for breakfast.

Schools must implement the three age-grade groups (K-5, 6-8 and 9-12). There is significant overlap in the component requirements between the age-grade groups, with the primary difference being increased minimum grain requirements for older students as described below.

Schools must plan breakfast meals that meet the calorie ranges, on average, over the course of the week. There is overlap between the age-grade groups, which provides further flexibility for schools that serve more than one age-grade group at breakfast. It is important to emphasize that the calorie requirements are average calorie requirements and that the calorie limits do not apply on a per-meal or per-student basis.

Foods offered must contain zero grams of *trans* fat per portion.

### ***Definitions***

A *food component* is one of three food groups that comprise reimbursable breakfasts. These are grains (with optional meat/meat alternate allowed); fruit/vegetable; and 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 and students may decline only one food item even if more than four food items are offered.

### ***Food Components***

#### *Grains*

- For all grade groups, schools must offer at least 1 ounce equivalent (oz eq) of grains each day.
- The minimum weekly offering varies by 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.
- *Half* of grains offered must be whole grain-rich in SY 2013-14.

#### *Optional Meat/Meat Alternate*

- There is no separate requirement to offer meat/meat alternates in the new SBP meal pattern.
- Schools may offer a meat/meat alternate in place of part of the grains component *after* the minimum daily grains requirement is offered in the menu or planned breakfast. A serving 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 any component.

#### *Juice/Fruit/Vegetable*

- In SY 2013-14, there is no change to the existing Juice/Fruit/Vegetable component.
- Schools must offer at least ½ cup of fruits and/or vegetables to all age-grade groups.
- Vegetables and fruits may be offered interchangeably, there are no substitution requirements and no vegetable subgroup requirements.
- There are no limitations on juice in SY 2013-14.
- Students are not required to take fruit under OVS in SY 2013-14.

#### *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 of milk, at least two options, must be offered.

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***Offer vs. Serve (OVS)***

Under OVS, for School Year 2013-2014, a student must be offered at least four food items and may decline only one food item. The food items selected may be from any of the required components and must be served in at least the minimum daily portion.

As noted above, for the SBP in School Year 2013-2014, students are not required to take a minimum ½ cup of fruit or vegetables for OVS.

**Additional Information**

Because aspects of the SBP meal pattern are being phased-in over multiple years, this guidance document reflects only those requirements in effect SY 2013-2014. Additional guidance will be provided for SY 2014-2015 and beyond, when all of the component requirements are in effect.

These Questions & Answers and other materials related to the new meal requirements are available on the FNS website at

<http://www.fns.usda.gov/cnd/Governance/Legislation/nutritionstandards.htm>.

We appreciate all you do for the School Meal Programs and look forward to continue working with you to improve the nutrition of America's children. State agencies are reminded to distribute this memo and enclosure to program operators immediately. SFAs should contact their State agencies for additional information. State agencies may direct any questions concerning this guidance to the appropriate Food and Nutrition Service Regional Office.

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Enclosure

## **The SBP in SY 2013-2014**

### *General Questions*

#### **Are all SFAs required to follow a food-based meal pattern to plan breakfasts in SY 2013-2014?**

Yes. The new SBP food-based meal pattern, which requires the fruits/vegetables, grains and milk food components, is required for all schools beginning SY 2013-2014. The fruits requirement (1 cup) takes effect beginning SY 2014-2015.

### *Grains*

#### **How much of the grains component must a school offer at breakfast in SY 2013-2014?**

Under the new meal pattern, 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 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.

#### **Can menu planners still offer traditional grits when the whole grain-rich requirement goes into effect for breakfast in SY 2013-2014?**

Yes. In SY 2013-14, half of the grains offered must be whole grain-rich. During this transition period, while trying to encourage students to accept whole grain-rich foods, schools can continue to offer traditional grits occasionally, as long as other grains offered are whole grain-rich. Schools may also offer whole grain-rich grits, which are currently commercially available and likely to become more widely utilized as usage of whole grain-rich products continues to increase.

#### **May schools offer a meat/meat alternate in the SBP in SY 2013-2014?**

Yes. Schools will continue to have the ability to 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 their menu. These options are as follows:

- Schools may offer a meat/meat alternate in place of grains, provided they offer at least 1 oz eq of grains daily. Under this flexible option, the meat/meat alternate offered in place of grains would count toward the weekly grains requirement and the dietary specifications. The operator receives credit for the meat/meat alternate under a required food component (grains).

- 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 eventually 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 recommendations of the Dietary Guidelines for Americans.

**Does a large grain food item (2 oz muffin) count as more than one item at breakfast?**

Yes. Beginning in SY 2013-14, 1 oz eq is the minimum required amount a child must be offered daily, for all age/grade groups, and counts as one item. Therefore, when a school offers a 2 oz eq grain at breakfast, it counts as two items. For purposes of OVS, a large grains item also counts as two of the four items that must be offered. For example, it is acceptable to offer a large grains item (2 oz eq muffin), fruit and milk. A student that selects the 2 oz eq muffin and the fruit would have a reimbursable meal.

**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?**

Menu planners have a couple of options related to how to count 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. breakfast 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 counted in place of grains. As noted above, a 2 oz eq grain is considered 2 items for purposes of OVS. Therefore, it is acceptable under OVS to offer a combination food that counts as 2 grain items, plus the full required amount of fruit and milk. In this scenario, the student may not decline the sandwich under OVS as it would exceed the maximum number of items that may be declined.
- The other option for the menu planner is to choose to not count the meat/meat alternate in the combination food toward the grains component. In this case, the meat/meat alternate is an “extra” food and does not count as an item for purposes of OVS. The 1 oz eq of grain in the combination food does count as one grains item. Therefore, the breakfast sandwich as a whole in this scenario counts as one grains item. Three additional items (including fruit/vegetable and milk) must be offered to have OVS, and the student may decline the sandwich since it is only 1 item.

## *Fruits/Vegetables*

### **How much fruit must a school offer at breakfast in SY 2013-2014?**

In SY 2013-2014 only, schools will continue to offer at least ½ cup of fruit daily to children in grades K-12. The 1 cup daily minimum fruit requirement takes effect in SY 2014-2015.

### **Is a student required to take fruit at breakfast in SY 2013-14?**

In SY 2013-14, the existing fruit/vegetable component remains in place and is unchanged. As noted above, schools are required to offer at least ½ cup of fruit, vegetable, or juice to students in all grade levels. However, students are not required to select this component for OVS purposes since this OVS provision is not yet in effect. Under OVS in SY 2013-14, students may decline any one food item, including the fruit/vegetable component, and have a reimbursable meal.

### **Is there a limit on the amount of juice that can be offered for breakfast in SY 2013-14?**

In SY 2013-14, the existing fruit/vegetable component remains in place and is unchanged. Therefore, there are no limitations on how much juice can be offered to meet the fruit/vegetable component. However, it is recommended that if juice is offered, schools also offer whole fruit options during the week, to assist students in transitioning to the limit on juice offerings effective in SY 2014-15.

## *Offer vs. Serve (OVS)*

### **How is Offer versus Serve (OVS) implemented in the SBP in SY 2013-14?**

OVS remains optional for all age/grade groups in the SBP, and schools using OVS must continue to offer at least four breakfast items in the amounts specified in the meal pattern. In SY 2013-2014, schools will continue to allow students to decline one food item from *any* component at breakfast.

### **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 ½ cup fruit, plus two grains: cereal (1 oz eq) and toast (1 oz eq). The student could select the 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.

**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.