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# Menu Planning Guide for School Meals for Grades K-12

## 5 — Meal Service

SFAs must comply with the USDA’s regulations and policies regarding meal service and Connecticut’s statute regarding lunch periods. This section addresses the federal and state meal service requirements for the NSLP and SBP, including lunch and breakfast periods, meal schedules, prohibition of gender separation, water availability, meal identification signage, multiple serving lines, pre-plated meals, vending machines, classroom meals, field trip meals, and family-style meal service.

### Lunch Periods

Lunch periods in Connecticut schools are governed by federal and state laws. The CSDE’s [Circular Letter C-9: Federal and State Requirements for Provision and Timeframe of Daily Lunch Period for Students](#), summarizes these requirements.

- The USDA’s NSLP regulations ([7 CFR 210.10\(f\)\(1\)](#)) specify that schools and institutions participating in the NSLP must serve lunches during the period from 10:00 a.m. to 2:00 p.m. If lunches will be served before or after this time, the SFA must submit a written waiver request to the CSDE for the alternate lunch time. The exemption request must be submitted by July 1 for the upcoming school year.
- C.G.S. [Section 10-221o](#) requires that all public schools must provide a minimum 20-minute daily lunch period for full-day students. This 20-minute lunch period is not required on half days or early dismissal days since school is not operating a full day.



For more information, refer to [the CSDE’s Circular Letter C-9: Federal and State Requirements for Provision and Timeframe of Daily Lunch Period for Students](#) and the CSDE’s memos, [Operational Memorandum No. 10-19: Requirements for Lunch Periods in the National School Lunch Program \(NSLP\)](#) and [Operational Memorandum No. 02-23: Mealtime Requirements for Regular and Half Days](#).

### Breakfast Periods

The USDA’s SBP regulations do not state a specific time period for breakfast but require that breakfast shall be served at or close to the beginning of the child’s day at school (7 CFR 220.2 “Breakfast”). The CSDE recommends that scheduled mealtimes provide students with at least 10 minutes to eat after sitting down for breakfast. This time does not include the time needed to walk to the cafeteria from the classroom, select and pay for the meal, sit down at a table, and walk back to the classroom after the meal.

### Meal Schedules

SFAs should schedule meal services to ensure good nutrition practices and minimize food waste. Generally, most children need to eat within 3 to 4 hours of their last meal.

- When the time span between breakfast and lunch is too short, children will not be hungry for lunch. An example is breakfast ending at 9:30 a.m. and lunch starting at 10:00 a.m. for the same group of children.
- When the time span between breakfast and lunch is too long, children can experience hunger symptoms that can interfere with learning, such as fatigue, irritability, inability to concentrate, weakness, and stomach pains. An example is breakfast ending at 8:00 a.m. and lunch starting at 1:00 p.m. for the same group of children.

SFAs should work with their school administrators to consider the appropriateness of timing and scheduling of all meals (and ASP snacks, if offered).



## Prohibition of Gender Separation

In general, the USDA's nondiscrimination laws and policies in 7 CFR Parts 15, 15a, and 15b do not permit SEAs participating in the USDA's school nutrition programs to separate children on any protected basis during meal service. Federal law prohibits discrimination based on gender at any educational institution receiving federal assistance. The USDA allows two exceptions to the prohibition of gender-separated meal service.

1. **Coeducational schools and school-based sites:** The USDA recognizes religious exemptions granted by the federal Department of Education (ED) without prior express approval. ED guidelines allow school and school-based sites to apply for an exemption when federal law prohibiting gender separation is inconsistent with the institution's religious tenets. These exemptions apply broadly to operations, including the meal service at a given site, such as a faith-based school. Additionally, ED guidelines specifically allow for the approval of gender-separate instruction at public primary and secondary non-vocational schools that could take a variety of forms. Since the general rule is that gender separation during meal service is prohibited, a coeducational school may not use limited ED approval of gender-separate instruction to justify blanket gender separation during meal service. Limited exemptions in these situations must be approved by the USDA.
2. **Other institutions and organizations:** State agencies may approve exemptions allowing separation by gender during meal service without express prior approval from the USDA in the following circumstances:
  - meal service at religious institutions operating under the dictates of the religion with which they are affiliated;
  - meal service at juvenile correctional facilities where combining members of the opposite gender would present a potential safety risk; and
  - meal service at facilities that fully separate by gender as part of their normal operations, e.g., gender-separated summer camps.

The local educational agency (LEA) must submit the request in writing to the CSDE. LEAs must specify which reason applies and why separation by gender is necessary. For more information on the exemption process, refer to [CSDE Operational Memorandum No. 30-15: Guidance on Prohibition of Separation by Gender during Child Nutrition Program Meal Service](#).

The two exceptions described above are the only acceptable bases for gender separation during meal service in the USDA's school nutrition programs. Any gender separation not based on the ED or USDA approval processes is strictly prohibited.

Situations that do not clearly fit into any of the exemptions outlined above may be considered on a case-by-case basis by the CSDE in direct consultation with the USDA Food and Nutrition Services (FNS) Regional Office, including the FNS Civil Rights Office and appropriate FNS National Office Child Nutrition Program staff.

### Water Availability During Meal Service

The NSLP regulations (7 CFR 210.10(a)(1)(i)) and SBP regulations (7 CFR 220.8(a)(1)) require that schools must make plain potable water available without restriction to children at no charge during the meal service. This means that children can freely access the water in the location where the meals are served. For example, if the SFA meets the water requirement with a water fountain that's in or immediately adjacent to the cafeteria, children must be allowed to leave their tables to access the water fountain during the meal service.

The requirements for the NSLP, SBP, and ASP are summarized below.

- **NSLP (including SSO school sites):** Water must be available at any location where lunch is served. This includes the cafeteria and any other meal service areas outside of the cafeteria, such as lunch carts, meals served in the classroom, and meals served during in-school suspension.
- **SBP (including SSO school sites):** Water must be available when breakfast is served in the cafeteria. The water requirement does not apply to breakfast meal service outside of the cafeteria, such as breakfast in the classroom.
- **ASP:** Water must be available during the snack service.



All schools implementing the NSLP, SBP, and ASP must meet these requirements.

Water is not a meal pattern component and is not part of the reimbursable meal or ASP snack.

### Examples of how to offer water

SFAs may implement the water requirement in a variety of ways. Some examples are listed below.

- Offer water pitchers and cups on tables or in an area that is easily accessible to all students during meals and ASP snacks.
- Provide a water fountain or a faucet that allows unrestricted access for students to fill their own bottles or cups with drinking water. This option must comply with the requirements below.
  1. The location of the water fountain or faucet must be in the foodservice area or immediately adjacent. An example is a water fountain that is right outside the door to the foodservice area and accessible to all students during the meal period.
  2. The water fountain or faucet must be operational.
  3. Staff members who supervise students in the cafeteria, such as lunch aides or paraprofessionals, must allow students to leave their tables to access the water fountain or faucet during the meal service, and should be trained on this requirement. Children do not have unrestricted access to water if their requests to get a drink of water are denied.
- Offer bottled water. When SFAs choose to offer bottled water, it must be provided at no cost to students.



### Field trips

The water requirement does not apply to field trips where reimbursable meals are served. However, the USDA encourages schools to make water available for all school-related functions, including field trips.

### Considerations for offering water

There are some important considerations to keep in mind when offering water to students during the meal service.

- While water must be made available to students during the meal service, water is not a meal pattern component and is not part of reimbursable meals or ASP snacks. Students are not required to take water.
- SFAs cannot promote or offer water or any other beverage as an alternative selection to fluid milk throughout the food service area. Commercially packaged water and potable water should not be made available in any manner that interferes with students' selection of the components of reimbursable meals, including low-fat or fat-free milk.



### Allowable costs for offering water

The USDA does not provide any separate funding or reimbursement for the water requirement and SFAs cannot claim reimbursement for water. However, SFAs may use funds from the nonprofit school food service account (NSFSA) to cover the allowable costs of providing potable water to students. An allowable cost is one that's considered reasonable, necessary, and allocable to the school nutrition programs. Some examples of possible allowable costs associated with providing potable water to students are listed below:

- Purchasing pitchers or cups that would be filled with water from the faucet or provided to students to fill with water from the faucet.
- Purchasing a 5-gallon dispenser for water. This cost would be allowable if the SFA has determined that this method of providing water is cost efficient and practical.
- Covering the cost of testing tap water and water fountains that will be used by students. The U.S. Environmental Protection Agency (EPA) recommends that all schools routinely test drinking water for lead and perform regular maintenance to ensure that drinking water is safe.

The determination of whether these costs are allowable for an individual SFA depends on their specific circumstances. Costs related to the purchase of potable water for consumption by students must always be reasonable, necessary, and allocable to the school nutrition programs. An allowable cost for one SFA might not be an allowable cost for another.



For guidance on how to determine allowable costs for the NSFSA, refer to the “General Criteria for Allowable Costs” section (page 13) of the USDA’s manual, *Indirect Costs: Guidance for State Agencies & School Food Authorities*.

### Resources for offering water

The websites and resources below address the requirement for offering water to students during the meal service.

- Indirect Costs: Guidance for State Agencies & School Food Authorities (USDA): <https://fns-prod.azureedge.us/sites/default/files/cn/SP60-2016a.pdf>
- USDA Memo SP 28-2011: Water Availability During NSLP Meal Service: <https://www.fns.usda.gov/cn/water-availability-during-nslp-meal-service>
- USDA Memo SP 39-2019: Clarification on the Milk and Water Requirements in the School Meal Program: <https://www.fns.usda.gov/school-meals/clarification-milk-and-water-requirements-school-meal-program>
- USDA Memo SP 49-2016 and CACFP 18-2016: Resources for Making Potable Water Available in Schools and Child Care Facilities: <https://www.fns.usda.gov/resources-making-potable-water-available-schools-and-child-care-facilities-0>
- What’s in a Meal Module 14: Water Availability During Meal Service (CSDE’s Training Program, What’s in a Meal: National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12): <https://portal.ct.gov/SDE/Nutrition/Meal-Pattern-Training-Materials>

For additional guidance and resources, visit the “[Water Availability During Meal Service](#)” section of the CSDE’s Program Guidance for School Nutrition Programs webpage. Training on the water requirement is available in “Module 14: Water Availability During Meal Service” of the CSDE’s training program, *What’s in a Meal: National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12*.

## Meal Identification Signage

Students, servers, and cashiers must be able to identify what constitutes a reimbursable meal. The USDA's NSLP and SBP regulations require SFAs to post cafeteria signage that provides clear information about the daily planned reimbursable meals and all allowable choices. The purpose of this signage is to prevent unintentional purchases of a la carte items and help students choose a reimbursable meal.

### Two signage requirements

SFAs must post two different types of cafeteria signage. This signage must clearly communicate the food components for each daily menu choice and indicate what students must select for a reimbursable meal.

1. **Identify foods and amounts offered for all planned reimbursable meals:** Section [7 CFR 210.10\(a\)\(2\)](#) of the NSLP regulations and section [7 CFR 220.8\(a\)\(2\)](#) of the SBP regulations require that SFAs must post signage to identify the planned reimbursable meals (i.e., all offered full meals), including the components and portions and any choices or combination of choices available within each component. This signage must be located near or at the beginning of each serving line. **Note:** This requirement applies to all schools and institutions, including those that do not implement offer versus serve (OVS) and those that implement family-style meal service.
2. **Identify required student selections for reimbursable meals with OVS:** Schools that implement OVS must indicate the minimum amount of each food component (lunch) or food item (breakfast) that students must select for a reimbursable meal, based on the planned daily menu for each grade group. This signage must be posted at all applicable points in the serving line where the food components or food items are available. For example, if the high school lunch menu offers fruits and vegetables in ½-cup servings and allows students to select two servings of fruits and two servings of vegetables to meet the required 1-cup serving for grades 9-12, the cafeteria signage must clearly communicate that students may select up to two servings of fruit and two servings of vegetables with each meal. This signage must be located on the serving line where the fruit and vegetable options are available. For more information on signage with OVS, refer to section 1 of the CSDE's [Offer versus Serve Guide for School Meals](#) and visit the "[Signage for OVS](#)" section of the CSDE's OVS webpage.

SFAs may choose how to identify the foods that are part of reimbursable meals, based on their facilities, layout, and other considerations. Some examples of acceptable signage include menu boards, posters, signs, labels, and table tents. While SFAs are not required to provide detailed information about the food components, such as identifying the vegetable subgroups, the CSDE strongly encourages SFAs to provide detailed information on food items and

choices whenever possible, within the constraints of the menu and serving line. This helps promote the school nutrition programs and makes it easier for students to understand what reimbursable meals include.

Signage is not required for field trips or breakfast in the classroom. If choices are offered, SFAs should use other methods to inform students about what to select and whether OVS is implemented. For information on OVS, refer to the CSDE’s *Offer versus Serve Guide for School Meals*.

### Reviewing signage for compliance

The checklist below helps SFAs determine if cafeteria signage meets the USDA requirements. Answer these questions for each cafeteria serving line. If any answers are “no,” the SFA must update the cafeteria signage as applicable.

- Is signage available for each daily lunch and breakfast choice and each serving line?
- Is signage clearly visible?
- Is signage located at or near the beginning of each serving line?
- OVS only*: Is signage located at the applicable points in the serving line near each food component (lunch) or food item (breakfast)?

A helpful best practice strategy to determine if the cafeteria signage is clear and effective is to conduct a cafeteria walk-through. Review the signage at the beginning of the serving line and continue through the entire serving line to the point of service.

### Signage resources

Signage resources and templates are available in the “[Signage for OVS](#)” section of the CSDE’s Offer versus Serve for Grades K-12 in School Nutrition Programs webpage. Training on signage requirements for OVS is available in “Module 15: Offer versus Serve (OVS) in the NSLP” and “Module 16: Offer versus Serve (OVS) in the SBP” of the CSDE’s training program, *What’s in a Meal: National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12*

### Multiple Serving Lines

When SFAs offer a variety of meals or have multiple serving lines, the USDA’s regulations require that schools make all required food components available to all students on every lunch line, in at least the minimum required amounts.

For the purposes of meeting the meal pattern requirements, menu planners should think of each serving line as its own entity. The daily and weekly requirements must be in place for **each** line. For example, when schools have multiple serving lines with different menu items, each serving line must offer all the vegetable subgroups during the week and provide the minimum weekly servings of the grains and MMA components.

When schools have serving stations where students can go to several different places to select different components of the meal before passing the POS, all stations must meet the daily and weekly requirements. An example might be a food court or scatter system where every student can select meal components from an entree line, a salad bar with vegetables and fruits, a pasta and bread station, and a milk cooler, before reaching the cashier. It is important to note that these types of food service systems are not typical in most Connecticut schools. In general, SFAs must plan to make all required daily and weekly food components available to all students on every lunch line.

For guidance on how multiple serving lines can comply with the vegetable subgroups requirement, refer to “Offering vegetable subgroups on multiple serving lines” in section 3.

### Pre-plated Meals and Vending Machines

Pre-plated meals offer all food components or food items in the quantities required for each grade group in an entirely or partially pre-served manner. Pre-plated meals and meal vending machines must offer all components and quantities required for each grade group, including the daily and weekly minimums and vegetable subgroups. For example, a meal vending machine that allows students to choose one sandwich will meet the weekly vegetable subgroups requirement if it also offers a selection of all vegetable subgroups during the week.

To the extent possible, schools are encouraged to modify their meal service systems to include OVS opportunities such as pre-plating some items and allowing students a choice of others, e.g., providing a basket with a variety of fruits or a separate cooler with milk choices. For information on OVS, refer to the CSDE’s *Offer versus Serve Guide for School Meals*.

## Classroom Meals

Serving meals in the classroom is an allowable meal service method for the NSLP and SBP. SFAs must ensure that food service and non-food service staff (such as teachers, teacher aides, and other applicable classroom staff) involved with classroom meals understand and implement the USDA’s requirements for reimbursable meals in the classroom. The CSDE strongly recommends that SFAs develop standard operating procedures (SOP) for classroom meals. For information on the requirements for classroom meals and how to avoid common meal pattern compliance issues, refer to the CSDE’s resource, [Requirements for Classroom Meals in the NSLP and SBP](#).

## Field Trip Meals

Meals offered to students for school-supervised field trips are reimbursable if they meet the daily meal pattern requirements for each grade group and are served and consumed as part of a school-related function. These functions must be part of the curriculum, as defined by the CSDE, and cannot be extracurricular events.

SFAs must offer the full quantities of all required components for each meal, including fluid milk. SFAs cannot substitute juice or water for milk on field trips. SFAs may want to consider using aseptically packaged milk for field trips.

Field trip meals must comply with Hazard Analysis and Critical Control Point (HACCP). The SFA’s standard operating procedures (SOP) for field trip meals must include appropriate food safety procedures (such as ice packs and coolers) to ensure that field trip meals stay at proper temperatures.

SFAs are not required to adjust the planned weekly menu to account for occasional field trips or pack the same vegetable offering from that day’s “hot” lunch menu for a field trip. SFAs have the option to offer a different vegetable from another subgroup or a different vegetable from the same subgroup. For example, if the regular menu includes cooked carrots (red/orange subgroup), the field trip lunch could include raw carrot sticks (red/orange subgroup) or celery (“other” subgroup).

SFAs must include field trip meals when planning meals that meet the minimum weekly requirements for the grains component and



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MMA component, and the dietary specifications for calories, saturated fat, trans fat, and sodium. For information on planning school meals to meet the dietary specifications, refer to section 6.

The NSLP and SBP regulations require that reimbursable meals must be served and consumed as part of the school program on school premises or school-related premises. School meals given to children to take home are not reimbursable. For more information, refer to USDA’s [FNS Instruction 786-8: Reimbursement for Off-Site Meal Consumption](#).

For more information, refer to the CSDE’s resource, [Requirements for Field Trip Meals in the NSLP and SBP](#).

### Family-style Meal Service

Family style is an optional type of meal service that allows children to serve themselves from communal platters or bowls of food with assistance, if needed, from supervising adults who sit with the children. While family-style meal service is allowable in the NSLP and SBP, implementation may not be practical in most schools. If SFAs implement family-style meal service, meals must follow the procedures below to ensure compliance and be eligible for reimbursement.

- A sufficient amount of prepared food and at least two varieties of milk must be placed on each table to provide the full required portions of each of the food components for all children at the table and to accommodate the supervising adults.

The allowable types of milk for grades K-12 include low-fat (1%) and fat-free milk, either unflavored or flavored. For more information, refer to “Milk Component” in section 3.

- Children must initially be offered the full required portion of each meal component. Meals must meet the daily and weekly requirements, and the weekly dietary specifications. However, since replenishment is immediately available at each table, students may select an initial serving of a food component or food item that is less than the full required minimum quantity. The supervising adult should encourage

additional portions and selections to meet the full required minimum serving size as appropriate, provided the weekly dietary specifications are not exceeded.

- During the meal, the supervising adults are responsible for actively encouraging each child to accept service of the full required portion (minimum daily serving) for each food component of the USDA’s meal patterns. For example, if a child initially refuses a food component or does not accept the full required portion, the supervising adults should offer the food component to the child again. The requirements for family-style meal service are different depending on whether the school implements OVS.
  - **Schools without OVS:** If a school or institution does not implement OVS, children must take the minimum portion size of all five food components at lunch and all three food items at breakfast to count as a reimbursable meal. **Note:** OVS is required in senior high schools for lunch. OVS is optional for all grades at breakfast.
  - **Schools with OVS:** If a school or institution implements OVS at lunch, children must take at least three of the five food components offered, including at least ½ cup of fruits or vegetables and the full serving (minimum daily amount) of at least two other components. If a school or institution implements OVS at breakfast, students must select at least ½ cup of fruits (or vegetables, if offered) and the full serving of at least two other food items. For more information, refer to the CSDE’s *Offer versus Serve Guide for School Meals*.
- SFAs must plan and offer the required food quantities for each child participating in the meal. These offered amounts must meet the minimum daily and weekly food components and the weekly dietary specifications.
- SFAs cannot claim second meals and second servings for reimbursement. Schools can claim only one reimbursable breakfast and one reimbursable lunch for each child per day. If a school elects to offer second servings of any part of the reimbursable meal without charging an a la carte price, these foods must count toward the daily and weekly meal pattern requirements and the weekly dietary specifications. Second servings of any foods must contain zero trans fat and their inclusion cannot cause the menu to exceed the average weekly limits for calories, saturated fats, and sodium.

Family-style meal service must be strictly supervised to ensure that schools serve reimbursable meals and follow adequate daily collection procedures. An adult must be present and monitor the entire process at each table to ensure that students take a reimbursable meal. The adult

must track students each day to determine who ate lunch in each meal eligibility category (free, reduced, and paid), without overt identification of the student's eligibility status.

### **Avoiding compliance issues with family-style meal service**

The CSDE has observed many compliance issues with family-style meal service. SFAs must carefully consider whether a school has the capacity to implement family-style meal service correctly and ensure that reimbursable meals are served. Due to the high level of supervision required during family-style meal service, many schools do not implement this type of meal service.

SFAs that choose to implement family-style meal service must submit their current written procedures to the CSDE. These procedures must indicate how the SFA will implement family-style meal service, and must provide assurances that the SFA will:

- prepare and offer the minimum serving for each required component in the NSLP and SBP meal patterns;
- monitor reimbursable meals by a trained supervising adult at each table;
- claim meals based on a student's free, reduced, or paid status;
- prevent overt identification during family-style meal service;
- conduct and document adequate training for supervising adults, including how to implement family-style meal service, the NSLP and SBP meal pattern requirements, and what constitutes a reimbursable meal.

The SFA must share their family-style meal service procedures with all staff and supervising adults involved in implementing family-style meal service. These procedures must also be available for audit purposes.

For additional guidance, refer to [USDA Memo SP 35-2011: Clarification on the Use of Offer Versus Serve and Family Style Meal Service](#). SFAs may contact their assigned CSDE school nutrition consultant for technical assistance (refer to the CSDE's [County Assignments for School Nutrition Programs](#)).