

Requirements for Alternate Protein Products in the School Nutrition Programs

School Year 2024-25 (July 1, 2024, through June 30, 2025)

This guidance applies to the U.S. Department of Agriculture’s (USDA) meal patterns for grades K-12 and preschool (ages 1-5) in the National School Lunch Program (NSLP), School Breakfast Program (SBP), and Afterschool Snack Program (ASP) of the NSLP. The Seamless Summer Option (SSO) of the NSLP follows the NSLP and SBP meal patterns. For information on the school meal patterns, visit the Connecticut State Department of Education’s (CSDE) [Meal Patterns for Grades K-12 in School Nutrition Programs](#) webpage, [Meal Patterns for Preschoolers in School Nutrition Programs](#) webpage, and [ASP](#) webpage. For information on the crediting requirements, visit the CSDE’s [Crediting Foods in School Nutrition Programs](#) webpage and [Crediting Documentation for the Child Nutrition Programs](#) webpage.



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Required Meal Pattern Quantities for Meats/Meat Alternates (MMA)

The quantities for the MMA component are indicated as ounce equivalents (oz eq) in the NSLP and SBP meal patterns for grades K-12 and the NSLP, SBP, and ASP preschool meal patterns; and as ounces in the ASP meal pattern for grades K-12. The amount that credits as 1 oz eq or 1 ounce of MMA is the same. This document refers to oz eq for simplicity.

Effective with school year 2025-26 (beginning July 1, 2025), the USDA final rule, [Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans](#), aligns the ASP meal pattern for grades K-12 with the [Child and Adult Care Food Program \(CACFP\) snack meal pattern](#). The serving size for MMA will change from ounces to oz eq.

For more information, visit the [“Meats and Meat Alternates”](#) section of the CSDE’s [“Crediting Foods in School Nutrition Programs”](#) webpage.

Crediting Alternate Protein Products (APPs)

Alternate protein products (APPs) credit as meat alternates in the meal patterns for the school nutrition programs. APPs are food ingredients that may be used alone or in combination with meat, poultry, or seafood. They are processed from soy or other vegetable protein sources and may be dehydrated granules, particles, or flakes. Some examples include soy flour, soy concentrate, soy isolate, whey protein concentrate, whey protein isolates, and casein. APPs may be used in the dry (nonhydrated), partially hydrated, or fully hydrated form.

APPs are generally used as part of a formed meat patty or in a vegetarian patty resembling a meat product. Examples of foods that might contain added APPs include beef patties, beef crumbles, pizza topping, meat loaf, meat sauce, taco filling, burritos, and tuna salad.

Processed food items such as vegetarian burgers may contain APP, but the food item itself is not an APP because it contains other ingredients such as seasonings or breading. APPs do not include tofu, surimi, seitan, or tempeh.

A 1-ounce serving of a creditable APP provides 1 oz eq of the MMA component. The total MMA contribution cannot exceed the weight of the product.

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Criteria for APPs

APPs must meet the USDA's requirements specified in [appendix A](#) of the NSLP regulations (7 CFR 210) and [appendix A](#) of the SBP regulations (7 CFR 220). These regulations specify that APPs may credit for part or all the MMA requirement if they meet the three criteria below.

1. The APP must be processed so that some portion of the non-protein constituents of the food is removed. This refers to the manufacturing process for APP. APP must be safe and suitable edible products produced from plant or animal sources.
2. The biological quality of the protein in the APP must be at least 80 percent of casein (milk protein), determined by performing a Protein Digestibility Corrected Amino Acid Score (PDCAAS). The PDCAAS is a method of evaluating protein quality.
3. The APP contains at least 18 percent protein by weight when fully hydrated or formulated. "When hydrated or formulated" refers to a dry APP and the amount of water, fat, oil, colors, flavors, or any other substances that have been added.

Menu planners cannot determine if an APP product meets these criteria by reading the product's label. The labeling laws of the USDA's Food Safety Inspection Service (FSIS) and Food and Drug Administration (FDA) require manufacturers to list product ingredients, but percentage labeling is voluntary.

For example, a product may list whey protein concentrate and hydrolyzed soy protein in the ingredients but will not indicate the percentage of these protein ingredients by weight. This means that manufacturers must provide the appropriate crediting documentation. For more information, refer to the USDA's [Questions and Answers on Alternate Protein Products](#).



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Required Documentation for APPs

The USDA's [Food Buying Guide for Child Nutrition Programs](#) does not contain yield information for APPs. SFAs must obtain documentation from the manufacturer that the product meets the USDA's APP criteria. Without appropriate documentation, APPs cannot credit in the school nutrition programs. Acceptable documentation for APPs includes:

- the original Child Nutrition (CN) label from the product carton or a photocopy or photograph of the CN label shown attached to the original product carton; or
- a product formulation statement (PFS) from the manufacturer with supporting documentation on company letterhead that the APP ingredient meets the USDA's requirements. Sample APP documentation is on page 6 of the USDA's [Questions and Answers on Alternate Protein Products \(APP\)](#).

The manufacturer's documentation should include information on the percent protein contained in the dry alternate protein product and in the prepared product. For an APP product mix, manufacturers should provide information on the amount by weight of dry APP in the package, hydration instructions, and instructions on how to combine the mix with meat or other meat alternates.

If the PFS for a commercial product lists APP ingredients that are being credited as the MMA component, the manufacturer must provide supporting documentation to indicate that the APP ingredients meet the USDA's APP requirements. APP ingredients without this supporting documentation cannot credit in reimbursable meals and afterschool snacks.

SFAs must maintain all crediting documentation on file in accordance with the records retention requirements for the school nutrition programs (refer to the CSDE's [Records Retention Requirements for the School Nutrition Programs](#)). This documentation must be current and will be reviewed by the CSDE during the [Administrative Review](#) of the school nutrition programs.

The USDA's [Questions and Answers on Alternate Protein Products \(APP\)](#) provides additional guidance on documenting the APP requirements. For information on CN labels and PFS forms, refer to the CSDE's [Using Product Formulation Statements in the School Nutrition Programs](#) and [Using Child Nutrition \(CN\) Labels in the School Nutrition Programs](#), and the USDA's [Tips for Evaluating a Manufacturer's Product Formulation Statement](#).

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Additional guidance on the crediting documentation requirements is available on the CSDE's [Crediting Documentation for the Child Nutrition Programs](#) webpage. Training on the requirements for CN labels and PFS forms is available in Module 6: Meal Pattern Documentation Part B – Crediting Commercial Processed Products, 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*.

Nutrition Disclosure for APPs

The NSLP regulations ([7 CFR 210.10 \(n\)](#)) require that schools must accurately represent foods on lunch and breakfast menus. Menus cannot claim that a food item is beef, pork, poultry (such as chicken or turkey), or seafood (such as fish or tuna) if the food item contains more than 30 percent APPs. The names used for these menu items must reflect that they are not 100 percent meat, poultry, or fish.

Considerations for Reducing Choking Risks for Young Children

Children younger than 4 are at the highest risk of choking. Some APP foods may be choking hazards, such as tube-shaped meats like hotdogs, sausage, and meat sticks. Consider children's age and developmental readiness when deciding what types of APP foods to offer in preschool menus. Modify menus as appropriate and use preparation techniques to reduce choking risk. For additional guidance, visit the "[Choking Prevention](#)" section of the CSDE's [Food Safety for Child Nutrition Programs](#) webpage.

Resources

Accepting Processed Product Documentation in the School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/accepting_procossed_product_documentation_snp.pdf

Accepting Product Documentation (CSDE's Crediting Documentation for the Child Nutrition Program webpage):
<https://portal.ct.gov/sde/nutrition/crediting-documentation-for-the-child-nutrition-programs/accepting-product-documentation>

Child Nutrition Labels (CSDE's Crediting Documentation for the Child Nutrition Program webpage):
<https://portal.ct.gov/sde/nutrition/crediting-documentation-for-the-child-nutrition-programs/child-nutrition-labels>

Crediting Commercial Meat/Meat Alternate Products in the School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/credit_commercial_mma_snp.pdf

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Crediting Documentation for the Child Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/sde/nutrition/crediting-documentation-for-the-child-nutrition-programs>

Crediting Deli Meats in the School Nutrition Programs (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/credit_deli_snp.pdf

Crediting Tofu and Tofu Products in the School Nutrition Programs (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/credit_tofu_snp.pdf

Meats and Meat Alternates (CSDE's Crediting Foods in School Nutrition Programs webpage):

<https://portal.ct.gov/sde/nutrition/crediting-foods-in-school-nutrition-programs/meats-and-meat-alternates>

Product Formulation Statements (CSDE's Crediting Documentation for the Child Nutrition Programs webpage):

<https://portal.ct.gov/sde/nutrition/crediting-documentation-for-the-child-nutrition-programs/product-formulation-statements>

Questions and Answers on Alternate Protein Products (APP) (USDA):

<https://www.fns.usda.gov/questions-and-answers-alternate-protein-products-app>

Resources for the Preschool Meal Patterns (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/nslp/preschool/resources_preschool_meal_patterns.pdf

Resources for the School Meal Patterns for Grades K-12 (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/nslp/mealpattern/resources_school_meal_patterns_grades_k-12.pdf

Reviewer's Checklist for Evaluating Manufacturer Product Formulation Statements (Product Analysis) for Meat/Meat Alternate (M/MA) Products

https://fns-prod.azureedge.us/sites/default/files/reviewer_checklist.pdf

Tips for Evaluating a Manufacturer's Product Formulation Statement (USDA):

<https://fns-prod.azureedge.us/sites/default/files/resource-files/manufacturerPFStipsheet.pdf>

Upcoming Meal Pattern Changes (CSDE's Meal Patterns for Grades K-12 in School Nutrition Programs webpage):

https://portal.ct.gov/sde/nutrition/meal-patterns-school-nutrition-programs#Upcoming_Meal_Pattern_Changes

USDA Final Rule: Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans (89 FR 31962):

<https://www.federalregister.gov/Documents/2024/04/25/2024-08098/Child-Nutrition-Programs-Meal-Patterns-Consistent-With-The-2020-2025-Dietary-Guidelines-For>

Using Child Nutrition (CN) Labels in the School Nutrition Programs (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/cn_labels_snp.pdf

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Using Product Formulation Statements in the School Nutrition Programs (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/product_formulation_statements.pdf

What's in a Meal Module 6: Meal Pattern Documentation Part B – Crediting Commercial Processed Products (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>

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For more information, visit the CSDE's [Crediting Foods in School Nutrition Programs](#) webpage or contact the [school nutrition programs staff](#) at the Connecticut State Department of Education, Bureau of Child Nutrition Programs, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841. This document is available at https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/app_requirements_snp.pdf.

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Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
2. fax: (833) 256-1665 or (202) 690-7442; or
3. email: program.intake@usda.gov

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