Avoiding Common Compliance Issues with Vegetables and Fruits in the Breakfast and Lunch Meal Patterns for Grades K-12

This guidance applies to the U.S. Department of Agriculture's (USDA) meal patterns for grades K-12 in the National School Lunch Program (NSLP) and School Breakfast Program (SBP). The Seamless Summer Option (SSO) of the NSLP follows the NSLP and SBP meal patterns.

For information on the meal patterns for the school nutrition programs, visit the Connecticut State Department of Education's (CSDE) Meal Patterns for Grades K-12 in School Nutrition Programs 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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During Administrative Reviews of the school nutrition programs, the Connecticut State Department of Education's (CSDE) school nutrition programs staff commonly observe several compliance issues with the vegetables component and fruits component of the NSLP and SBP meal patterns for grades K-12. These compliance issues include:

- not providing the minimum portion size for fruits and vegetables;
- not meeting the weekly vegetable subgroups requirement at lunch; and
- missing or inadequate signage for fruits and vegetables.

This document provides guidance for school food authorities (SFA) on how to avoid these compliance issues.

Required Portion Sizes for Vegetables and Fruits

The NSLP and SBP meal patterns require minimum daily and weekly servings of the fruits component and vegetables component for each grade group. The weekly servings are the sum of the daily servings. SFAs must always plan and offer the minimum servings.

- The daily breakfast meal patterns require 1 cup of the fruits component for all grades. For school year 2026-27, vegetables may substitute for fruits at any breakfast. For more information, refer to "Vegetables at Breakfast" in the "Vegetables" section of the CSDE's Crediting Foods in School Nutrition Programs webpage.

- The daily lunch meal patterns require ½ cup of fruits and ¾ cup of vegetables for grades K-5 and 6-8, and 1 cup of fruits and 1 cup of vegetables for grades 9-12. Lunch menus must also include minimum weekly amounts of the five vegetable subgroups (dark green, red/orange, beans, peas, and lentils, starchy, and other). For information on the vegetable subgroups, refer to the CSDE's resource, *Vegetable Subgroups in the National School Lunch Program*.

Menus that do not meet these requirements are not reimbursable.

Student selections with offer versus serve (OVS)

SFAs that implement OVS must follow specific requirements for reimbursable meals. For a reimbursable lunch, students must select at least ½ cup of fruits or vegetables and the full serving of two other meal components. For a reimbursable breakfast, students must select at least three food items, including at least ½ cup of fruits (or vegetable substitutions, if offered) and the full serving of at least two other food items.

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Depending on the grade group being served, the required ½-cup serving of fruits or vegetables that students must select for OVS could be less than the full planned serving for the menu. For example, a student's OVS selection of ½ cup of vegetables is less than the required ¾ cup of vegetables for grades K-5 and 6-8, and the required 1 cup of vegetables for grades 9-12. While OVS allows students to select less than the full planned serving of fruits and vegetables, menus cannot offer less than the required meal pattern serving.

Table 1 shows the difference between the daily lunch meal pattern servings of fruits and vegetables and the required student selections under OVS.

Table 1. Daily requirements for fruits and vegetables at lunch

Grades	**Meal Pattern Requirements:** Schools must plan and offer full daily meal pattern serving	**OVS:** Students must select
K-5 **6-8**	½ cup of fruits ¾ cup vegetables	At least ½ cup of fruits or vegetables
9-12	1 cup of fruits 1 cup of vegetables	At least ½ cup of fruits or vegetables

Offering fruits and vegetables in ½-cup portions

When schools offer all fruits and vegetables in ½-cup portions, students must be allowed to select at least the minimum required amount.

- **Example of offering ½-cup portions to grades K-5 and 6-8:** Lunch menus for these grade groups must include ½ cup of the fruits component and ¾ cup of the vegetables component. When schools offer ½-cup portions of fruits and vegetables, students must be allowed to select one serving of fruit (½ cup) and up to two servings of vegetables (1 cup). Students can choose to select only ½ cup of vegetables with OVS, but schools cannot offer students only ½ cup of vegetables because the lunch meal pattern for grades K-5 and 6-8 requires ¾ cup of vegetables. The cafeteria signage must clearly communicate what constitutes the full planned meal, and that students are allowed to select one serving of the fruits component and up to two servings of the vegetables component with each reimbursable meal.

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Detailed guidance on the OVS requirements for fruits and vegetables for grades K-12 is available in the CSDE's Offer versus Serve Guide for School Meals, and visit the CSDE's OVS webpage.

Offering Vegetable Subgroups on Multiple Serving Lines at Lunch

Lunch menus must meet the vegetable subgroup requirements on a weekly basis. Menu planners may choose what combinations of vegetable subgroups to offer each day. Each subgroup must be available to all students in at least the minimum quantities during the week. The lunch menu cannot require students to choose one subgroup over another on a single day if these subgroups are not offered again during the week.

Must offer vegetable subgroups on each serving line

When SFAs have multiple serving lines or offer a variety of meal choices, the minimum required portion of all meal components must be available to all students for every meal on each serving line. Each lunch choice and each serving line must offer all students access to the same daily vegetable subgroups, unless that subgroup is offered again later in the week or the school offers a daily vegetable subgroup rainbow tray (refer to "Offering Rainbow Trays at Lunch" in this document).

When planning menus to meet the weekly vegetable subgroups, menu planners should think of each serving line as its own entity. The daily and weekly requirements must be met for each serving line. The examples below illustrate this requirement.

- **Example 1:** A school offers a hot lunch choice and cold lunch choice on the same lunch line. Tuesday's menu offers corn (starchy subgroup) as the daily vegetables component for the hot lunch menu and baby carrots (red/orange subgroup) as the daily vegetables component for the cold lunch menu. If the cold lunch menu does not offer corn (or another starchy vegetable) later in the week, Tuesday's cold lunch menu must offer corn (or another starchy vegetable). Otherwise, students who select the cold lunch on Tuesday do not have access to the starchy vegetables subgroup that week.

- **Example 2:** A school has three different lunch lines, including a hot lunch line, a deli line, and a grill line. Monday's hot lunch menu features baked beans (beans, peas, and lentils subgroup) as the daily vegetable. To meet the weekly vegetable subgroups requirement, baked beans (or another vegetable from the beans,

peas, and lentils subgroup) must also be available on the other two serving lines. For example, Monday's menu for the deli line and grill line must include baked beans or another vegetable from the bean, peas, and lentils subgroup, such as garbanzo beans or lentils. SFAs cannot post signs on the deli line and grill line directing students to select the vegetable subgroup choice from a different serving line. Each serving line must offer the full reimbursable meal, including the required weekly servings of the vegetable subgroups.

Offering Rainbow Trays at Lunch

Offering a daily vegetable subgroup "rainbow" tray on each serving line is the best practice for meeting the NSLP meal pattern requirements for the weekly vegetable subgroups. A rainbow tray includes pre-portioned selections from each of the five vegetable subgroups. An example is offering a choice of baby carrots (red/orange subgroup), broccoli florets (dark green subgroup), marinated chickpeas (beans, peas, and lentils subgroup), corn (starchy subgroup), and sliced cucumbers (other subgroup). This provides students with access to each vegetable subgroup every day.

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Meal Identification Signage

Students, servers, and cashiers must be able to identify what constitutes the full planned meal and what constitutes a reimbursable meal under OVS. The USDA requires that SFAs must post two different types of cafeteria signage. This signage must clearly communicate the meal 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 meal components and portions and any choices or combination of choices available within each meal 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 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 meal 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 meal 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.

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. For more information on signage, refer to the CSDE's resource, *Signage Requirements for the National School Lunch Program and School Breakfast Program*, and visit the "Required Signage for OVS" section of the CSDE's OVS webpage.

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Resources

Administrative Review for School Nutrition Programs (CSDE webpage):
https://portal.ct.gov/sde/nutrition/administrative-review-for-school-nutrition-programs

Crediting Documentation for the Child Nutrition Programs (CSDE webpage):
https://portal.ct.gov/sde/nutrition/crediting-documentation-for-the-child-nutrition-programs

Crediting Foods in School Nutrition Programs (CSDE):
https://portal.ct.gov/sde/nutrition/crediting-foods-in-school-nutrition-programs

Crediting Guide for the School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/mpg/guide_crediting_snp.pdf

Food Buying Guide for Child Nutrition Programs (USDA):
https://www.fna.usda.gov/tn/fbg

Fruits Component (CSDE's Crediting Foods in School Nutrition Programs webpage):
https://portal.ct.gov/sde/nutrition/crediting-foods-in-school-nutrition-programs/fruits

Meal Patterns for Grades K-12 in School Nutrition Programs (CSDE webpage):
https://portal.ct.gov/sde/nutrition/meal-patterns-school-nutrition-programs

NSLP Regulations 7 CFR 210.10(a)(2) Unit pricing:
https://www.ecfr.gov/current/title-7/part-210/section-210.10#p-210.10(a)(2)

SBP Regulations 7 CFR 220.8(a)(2) Unit pricing:
https://www.ecfr.gov/current/title-7/part-210/section-210.10#p-210.10(a)(2)

Offer versus Serve for School Nutrition Programs (CSDE webpage):
https://portal.ct.gov/sde/nutrition/offer-versus-serve-for-school-nutrition-programs

Offer versus Serve Guide for School Meals (CSDE):
https://portal.ct.gov/sde/nutrition//-/media/sde/nutrition/nslp/ovs/ovs_guide_snp.pdf

Signage Requirements for the National School Lunch Program and School Breakfast Program (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/ovs/signage_requirements_nslp_sbp.pdf

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Vegetable Subgroups in the National School Lunch Program (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/vegetable_subgroups_nslp.pdf

Vegetables Component (CSDE's Crediting Foods in School Nutrition Programs webpage):
https://portal.ct.gov/sde/nutrition/crediting-foods-in-school-nutrition-programs/vegetables

What's in a Meal: Meal Patterns for Grades K-12 in the School Nutrition Programs (CSDE Training Program):
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/ avoiding_compliance_issues_ vegetables_fruits_snp_k12.pdf.

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