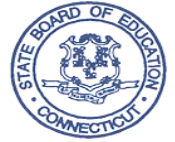




STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Sponsors of the National School Lunch and School Breakfast Programs

FROM: Cheryl Resha, Education Manager *Cheryl Resha*
Bureau of Health/Nutrition, Family Services and Adult Education

DATE: May 3, 2012

SUBJECT: **Operational Memorandum #22-12**
Grain Requirements for the National School Lunch Program
and School Breakfast Program

SOURCE CITATION: 42 USC 1753(b)(3) and 1758(a)(4) and 7 CFR Parts 210 and 220

This memorandum explains the grains requirements for the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) and specifically addresses implementation of the ounce equivalents and definition of whole grain-rich products.

The U.S. Department of Agriculture (USDA) published "Nutrition Standards in the National School Lunch and School Breakfast Programs" on January 26, 2012. This final rule amended NSLP and SBP regulations at 7 CFR 210.10 and 220.8, updating the meal patterns and nutrition standards to align them with the 2010 *Dietary Guidelines for Americans* (DGAs) as required by Sections 4(b) and 9(a)(4) of the Richard B. Russell National School Lunch Act as amended by Section 201 of the Healthy, Hunger-Free Kids Act of 2010. The meal patterns for the NSLP and the SBP include quantities of grains based on ounce equivalents in a manner that is consistent with the DGAs and the USDA food guidance system known as MyPlate. The amounts of foods included in the meal pattern, including the amount of ounce equivalents of grains, were carefully determined through an extensive review and assessment to meet 24 nutrient targets. NSLP and SBP nutrition standards also require all grains to be whole grain-rich by school year (SY) 2014-15.

This memorandum sets forth the criteria to be used by school food authorities (SFAs) and program operators to determine grains that meet the regulatory standards and to determine equivalent minimum serving sizes. In addition, this memorandum includes examples of foods that qualify as grains based on the nutrition standards in the NSLP and SBP hereafter referred to as "school meal programs."

I CRITERIA FOR DETERMINING ACCEPTABLE GRAINS FOR SCHOOL MEAL PROGRAMS

The requirements to offer whole grain-rich products will be phased in for the school meal programs over the next two school years:

- For **lunch**, beginning July 1, 2012 (SY 2012-13), through June 30, 2014 (SY 2013-14), half of the grains offered during the school week must meet the whole grain-rich criteria. Beginning July 1, 2014 (SY 2014-2015), **all** grains must meet the whole grain-rich criteria.
- For **breakfast**, beginning July 1, 2013 (SY 2013-14), half of the grains offered during the school week must meet the whole grain-rich criteria. Beginning July 1, 2014 (SY 2014-2015), *all* grains must meet the whole grain-rich criteria.

Through SY 2013-14, SFAs and program operators should continue to refer to *Section 3 Grains/Breads* of the *Food Buying Guide for Child Nutrition Programs* (http://teammnutrition.usda.gov/Resources/FBG_Section_3-GrainsBreads.pdf) and *FCS Instruction 783 - REV 2, The Grains/Breads Requirements for Food-based Menu Planning Alternatives in the Child Nutrition Programs* for guidance on products that meet the grains requirements, but not the whole grain-rich requirements. After SY 2013-14, all grain must be whole grain-rich to meet NSLP and SBP nutrition standards. The USDA is in the process of updating several resources to assist SFAs and program operators with identifying whole grain-rich foods. These resources will be available by summer 2012.

Whole Grain-Rich Criteria

In accordance with NSLP and SBP regulations 7 CFR Parts 210 and 220, the following criteria must be used as the basis for crediting items to meet the whole grain-rich requirement:

Foods that qualify as whole grain-rich for the school meal programs are foods that contain 100 percent whole grain or contain a blend of whole-grain meal and/or flour and enriched meal and/or flour of which at least 50 percent is whole grain. Whole grain-rich products must contain at least 50 percent whole-grains and the remaining grain, if any, must be enriched.

Schools can use the following elements as a simple checklist to evaluate if a grain product meets the whole grain-rich criteria:

- Element 1: The food item must meet the ounce equivalent requirements for the grains component as defined by this guidance.
- Element 2: The food must meet at least one of the following:
 1. The whole-grain content per ounce equivalent based on the weights in the attached *Whole Grain-Rich Ounce Equivalents Requirements for School Nutrition Programs* must be at least 8 grams or more for Groups A – G. For Groups H and I, the volumes or weights listed must be offered to credit as one ounce equivalent. This information may be determined from information provided on the product packaging or by the manufacturer, if available.

2. The product includes the following Food and Drug Administration (FDA)-approved whole-grain health claim on its packaging: *“Diets rich in whole grain foods and other plant foods and low in total fat, saturated fat, and cholesterol may reduce the risk of heart disease and some cancers.”*
3. The product ingredient declaration lists whole grains first, specifically:
 - **Non-mixed dishes (e.g., breads, cereals):** whole grains must be the *primary ingredient* by weight, i.e., a whole grain is the first ingredient in the list with an exception for water. When the whole grain content comes from multiple ingredients, the combined whole grain ingredients may be the primary ingredient by weight even though a whole grain is not listed as the first ingredient. These products could meet the whole grain-rich criteria with proper manufacturer documentation. For example, a bread item may be made with three grain ingredients: enriched wheat flour (40% of grain), whole wheat (30% of grain), and whole oats (30% of grain). The program operator, with the assistance of manufacturers, could determine that whole grains are the primary ingredient by weight since the combined 60% whole grain ingredients are greater than the enriched wheat flour at 40%, even though the enriched flour may be listed first in the ingredient declaration.
 - **Mixed dishes (e.g., pizza, corn dogs):** whole grains must be the *primary grain ingredient* by weight, i.e., a whole grain is the first grain ingredient in the list of grains. For foods prepared by the school food service, the recipe is used as the basis for a calculation to determine whether the total weight of whole-grain ingredients exceeds the total weight of non whole-grain ingredients.

When flour blends are listed in the ingredient declaration and grouped together with parentheses, for example, *“ingredients: flour blend (whole wheat flour, enriched flour), sugar, cinnamon,”* program operators will need to know either that the whole grain content is at least 8 grams per ounce equivalent or that the weight of the whole grain is greater than the first ingredient listed after the flour blend, such as “sugar in the example.

A ready-to-eat (RTE) breakfast cereal must list a whole grain as the primary ingredient and the RTE cereal must be fortified. If the grain product includes enriched ingredients, or the product itself is enriched, the ingredients or the grain product must meet the FDA’s standards of identity for enrichment (21 CFR Section 137). Bran and germ are not creditable in school meal programs. Noncreditable grain ingredients in products at very low levels used as processing aids are allowable at levels less than two percent.

Manufacturers may apply for a Child Nutrition (CN) Label for qualifying products to indicate the number of ounce equivalent grains that meet the whole grain-rich criteria. The term, “oz eq grains” on the CN Label indicates the product meets the whole grain-rich criteria, while the terms “bread” or “bread alternate” on the CN Label indicate the product meets the previous USDA requirements for grains/breads. For details regarding qualifying products, refer to the CN Labeling Program Web site at <http://www.fns.usda.gov/cnd/cnlabeling/>.

II CRITERIA FOR DETERMINING EQUIVALENT MINIMUM SERVING SIZES

Pursuant to the new NSLP and SBP regulations, the updated meal patterns, which include requirements for whole-grain rich grain products based on ounce equivalents, will become effective on July 1, 2012, the beginning of SY 2012-13. Recognizing that operators and manufacturers that provide products for the school meal programs may require time to change specifications and revise products, the USDA will allow SFAs and program operators to credit grain products based on the current 14.75 grams of grains per serving through SY 2012-13. All grain products must be credited based on ounce equivalent standards beginning on July 1, 2013 (SY 2013-14).

The NSLP and SBP regulations require that grain products must be credited using the ounce equivalent method. This criterion is applied to various products as follows:

- Baked goods, such as breads, biscuits and bagels, require 16 grams of creditable grain ingredients to provide a 1-ounce equivalent credit.
- For cereal grains such as oatmeal, pasta and brown rice, a 1-ounce equivalent is 28 grams (approximately 1 ounce by weight) of dry product. Since these grains are served cooked and water is added in preparation, the cooked volume equivalent is ½ cup of cooked cereal, pasta or rice.
- For RTE breakfast cereal, 28 grams *or* 1.0 ounce of product is a 1-ounce equivalent. The ounce equivalent volumes are 1 cup of flakes or rounds, 1.25 cups of puffed cereal and ¼ cup of granola. As with baked goods, the USDA recognizes that program operators and manufacturers may need additional time to adjust products and orders with respect to volume requirements for RTE cereal.

The new meal patterns provide a minimum and maximum number of ounce equivalents to meet the weekly grains requirement by age group. All grains offered should be counted toward meeting these minimum and maximum requirements using the ounce equivalent or “bread” or “bread alternate” criteria in the interim. Of the weekly total for lunch, up to two (2) ounce equivalents of grains per week may be in the form of a grain-based dessert. However, the Connecticut State Department of Education does not recommend this practice because these foods are often high in fats and added sugars.

During SY 2012-13, battered and/or breaded products offered will not need to be counted toward the *maximum* weekly grain requirements in the meal pattern. Beginning July 1, 2013 (SY 2013-14), all grains that are part of battered and/or breaded products offered must be counted towards the weekly grains requirement.

The contribution of grains in a recipe or product formulation for items listed in Groups A-G of the attached *Whole Grain-Rich Ounce Equivalents Requirements for School Nutrition Programs*, may be calculated to determine the number of ounce equivalents of grains the recipe provides based on 16 grams of grain ingredients per ounce equivalent. The crediting of a food item as ounce equivalents of grains is determined by the *total amount in grams of whole-grain meal and/or flour or whole-grain and enriched meal and/or flour* in the product formulation or recipe divided by the *number of servings the formulation or recipe yields* divided by the 16 grams per ounce equivalent standard. For the types of food items listed in

Groups H and I to count as one full serving, the specific weights or volumes listed must be used.

One quarter (1/4) of an ounce equivalent is the smallest amount allowable to be credited toward the quantities of grains. If the minimum daily requirement for grains is 1 ounce equivalent, this minimum can be met by offering multiple food items, for example, 0.5 ounce equivalent of one grain item and 0.5 ounce equivalent of another grain item. The ounce equivalent for grains may be determined by using either the weights or volumes listed in *Whole Grain-Rich Ounce Equivalency Requirements for School Nutrition Programs* (see attached), or the SFA may require documentation from a manufacturer certifying the grams of creditable grains per portion for determining the ounce equivalent for a given product.

The attached *Whole Grain-Rich Ounce Equivalents Requirements for School Nutrition Programs* contains the equivalent minimum weights for a wide variety of purchased food items to meet the ounce equivalent criteria. Program operators may use this handout instead of calculating the actual amount of grains in a product since it provides the equivalent minimum weights to provide one ounce equivalent of grains.

Whole Grain-Rich Ounce Equivalents Requirements for School Nutrition Programs provides ounce equivalent information for products commonly offered in schools. It is not a comprehensive list of all possible grain foods. SFAs have flexibility to use a wide range of products in planning meals that meet NSLP and SBP meal pattern and nutrition specifications. However, program operators are strongly encouraged to offer food items that are low in added sugars, sodium and saturated fat to meet these requirements and provide foods that are consistent with the DGAs.

SUMMARY OF IMPLEMENTATION DATES

Ounce equivalent requirements: All grain products must be credited based on ounce equivalent standards beginning July 1, 2013 (SY 2013-14). The grain component weights in the attached *Whole Grain-Rich Ounce Equivalents Requirements for School Nutrition Programs* have been updated to reflect the change from 14.75 grams of creditable grain to 16.0 grams of creditable grain per ounce equivalent for Groups A-G. For lunch and breakfast, schools may continue to use the original weights and volumes in *Serving Sizes for Grains in School Nutrition Programs* (http://www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/nslp/servingsgb_snp.pdf) through June 30, 2013.

Whole grain-rich requirements: For lunch, beginning July 1, 2012 (SY 2012-13), half of the grains offered during the school week must meet the whole grain-rich criteria. For breakfast, beginning July 1, 2013 (SY 2013-14), half of the grains offered during the school week must meet the whole grain-rich criteria. Beginning July 1, 2014 (SY 2014-2015), *all* grains must meet the whole grain-rich criteria for lunch and breakfast.

For the NSLP and SBP (sections 210.10, 210.10a, 220.8, and 220.8a), this policy memorandum supersedes FCS Instruction 783 - REV 2, The Grains/Breads Requirements for Food-based Menu Planning Alternatives in the Child Nutrition Programs and the *Food Buying Guide for Child Nutrition Programs*' guidance on grains/breads. However, the USDA will revise FCS Instruction 783 - REV 2 to remove the sections mentioned above and this instruction will pertain to all other Child Nutrition Programs.

Questions may be directed to:

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Attachment