

STATE OF CONNECTICUT DEPARTMENT OF EDUCATION



- **TO:** Sponsors of the National School Lunch and School Breakfast Programs
- **FROM:** Therese Dandeneau, Education Consultant *Theuse a. Dandeneau*_____ Bureau of Health/Nutrition, Family Services and Adult Education
- **DATE:** March 13, 2013
- SUBJECT: Operational Memorandum #20-13 Extending Flexibility in the Meat/Meat Alternate and Grains Maximums for School Year 2013-14

On January 4, 2013, the Connecticut State Department of Education issued operational memorandum 7-13, based on U.S. Department of Agriculture (USDA) policy memorandum SP 11-2013 REVISED, December 20, 2012, which gave school food authorities (SFAs) flexibility in meeting the weekly maximums for grains and meat/meat alternates in the National School Lunch Program for compliance purposes in school year 2012-13. The memorandum stated that SFAs are compliant with the weekly ranges for these two components if the USDA-developed or USDA-approved Certification Tool and required supporting documentation indicate the menu is compliant with the daily and weekly *minimums*.

Since the release of USDA memo SP 11-2013, school food service operators, state agencies, industry members and other stakeholders have asked the USDA to issue clear guidance to assist them with planning and procurement for school year 2013-14. Therefore, and as discussed below, the USDA recently released revised guidance (SP 26-2013) that **extends the flexibility in assessment of the weekly maximums for grains and meat/meat alternates through school year 2013-14 for both breakfast and lunch.** During this time, SFAs are not required to comply with the maximums for meat/meat alternates and grains. Menus must still meet the minimums for these two components.

However, it is important to note that the new meal patterns for lunch and breakfast have not changed and menus must still meet the weekly calorie limits. SFAs should continue to use the meal pattern ranges for meat/meat alternates and grains to help menus meet the weekly calorie limits and dietary specifications for saturated fat, trans fat and sodium. If menus are regularly planned to include larger amounts of meat/meat alternates and grains, it is likely that they will not comply with the weekly calorie limits and will not be eligible for reimbursement.

The USDA understands the need for longer term guidance on this issue and is currently considering options for addressing this flexibility beyond next year. The USDA continues to welcome input from a broad range of program stakeholders and interested parties regarding the impact of this flexibility.

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Implementation Experiences during School Year 2012-13

Since the release of memo SP 11-2013, the USDA has received significant feedback from state agencies and SFAs requesting an extension of this flexibility for future years. State agencies and SFAs continue to identify notable operational challenges in meeting the weekly maximums for the grain and meat/meat alternate components. The three primary challenges include menu planning, product availability and student acceptance.

- *Menu Planning:* Since grains may be served in a variety of ways in school meals, SFA menu planners have had difficulty when considering different portion sizes for grains both within single meals and across the various meals offered on a single serving line each day. Schools with multiple serving lines during meal service are reporting similar challenges. The USDA encourages creativity and discretion at the local level to offer a variety of foods to students. Therefore, continuing flexibility in assessing compliance with the weekly maximums for grains and meat/meat alternates offers SFA menu planners additional assistance in planning menus and serving lines to accommodate schools with multiple meal options, as well as those serving multiple age/grade groups.
- *Product Availability:* SFAs have continued to report that some popular grain and meat/meat alternate products are not widely available from suppliers in a useful range of serving sizes needed to stay within the weekly maximum requirements. The USDA recognizes that product reformulation is continuing and will be needed to allow SFAs to meet all the requirements associated with the new meal patterns. However, the USDA also recognizes that modification of some grain and meat/meat alternate products has been more challenging. The USDA continues its own efforts to obtain some USDA Foods in appropriate serving sizes, notably poultry.
- *Student Acceptability:* The USDA recognizes that school meals must be selected and ultimately consumed by students to achieve the goal of providing adequate nutrition to our nation's schoolchildren. SFAs have reported that the additional flexibility has allowed them to continue to offer to their students some favorite food items, in moderate portion sizes, during the week. For example, schools reported increased meal acceptance in grades K-5 when they were able to offer sandwiches with 2 ounces of bread every day to students. The ability of SFAs to make more gradual changes to existing menus has facilitated the transition to full implementation of the new meal pattern.

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Impact on Meal Pattern Compliance

The weekly maximums included in the final rule for grains and meat/meat alternates were intended to help menu planners meet the weekly dietary specifications, including calories. However, as noted above, feedback from schools during this initial implementation period indicates that these component maximums have proven to be more difficult for menu planners than anticipated. The flexibility offered in school year 2012-13 through USDA's December policy memorandum has allowed schools to develop nutritious and appealing menus without compromising the meal pattern or deviating from the recommendations of the *Dietary Guidelines for Americans*. In fact, SFAs have been reporting that they have been able to successfully modify their menus and are being certified by their state agencies. Using the additional flexibility on the weekly ranges, SFAs have been able to come into compliance with the new meal pattern, including calories, while continuing to maintain student acceptability.

The USDA also has more information now regarding the content of school meals offered in recent years, due to the recent release of the School Nutrition Dietary Assessment study (SNDA IV). In school year 2009-10, before the weekly maximums for grains and meat/meat alternates were in place, the average lunch offered in high schools had 843 calories. This indicates that, with a calorie limit of 850 calories in the new meal pattern (on average over the course of the week), most high schools are able to offer the same amount of calories as have historically been offered, without component maximums.

Next Steps

To further facilitate the transition to more nutritious and appealing meals, the USDA is extending the flexibility for both breakfast and lunch through school year 2013-14. State agencies should therefore consider as compliant for certification and administrative reviews those SFAs meeting only the weekly *minimums* for the grains and meat/meat alternates components. SFAs must also continue to meet all of the remaining food components and dietary specifications, including calories. The meal patterns remain unchanged and SFA menu planners are encouraged to consider the weekly maximums for grains and meat/meat alternates as a goal that can assist in offering balanced meals that meet the calorie, sodium, and saturated fat requirements.

As implementation of the new meal pattern continues, the USDA encourages state agencies to work with SFAs to assist them in meeting the new requirements. The USDA anticipates that the flexibility in compliance assessment reflected in this memorandum will continue to facilitate implementation of the new meal pattern in school year 2013-14. As previously described, the USDA continues to welcome feedback from SFAs and state agencies.

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Important: This is a numbered Operational Memorandum that contains important program information. Please read carefully and retain in a binder for your future reference. Operational Memoranda are also posted on the Child Nutrition Web site at http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=320676.