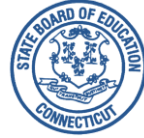




STATE OF CONNECTICUT  
DEPARTMENT OF EDUCATION



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

**FROM:** John Frassinelli, Chief  
Bureau of Health/Nutrition, Family Services and Adult Education

**DATE:** April 27, 2015

**SUBJECT:** **Operational Memorandum #20-15**  
Requests for Exemption from the School Meals' Whole Grain-rich Requirement for School Years (SY) 2014-15 and 2015-16

Recently, the United States Department of Agriculture (USDA) issued Food and Nutrition Service (FNS) Instruction SP 20-2015: [Requests for Exemption from the School Meals' Whole Grain-rich Requirement for School Years 2014-15 and 2015-16](#). This Instruction outlined new requirements for requesting an exemption from the School Meals' Whole Grain-rich (WGR) Requirement for SY 2014-15 and SY 2015-16. In summary, the USDA is allowing State agencies the option of permitting school food authorities (SFA) the opportunity to request a WGR exemption. If the State agency does allow an exemption, a process for evaluating and responding to requests for exemptions must be developed and shared with SFAs. Also, for the remainder of SY 2014-15 and in SY 2015-16, a State agency may approve a SFA's exemption request for specific products if the SFA can demonstrate hardship(s) in procuring, preparing, or serving compliant WGR products acceptable to students. The temporary exemptions are allowed for any type of grain product(s), (e.g., pasta, bread, brown rice, etc.) and for one or more different products.

SFAs granted an exemption must work with the State agency to search for acceptable products, and must comply with the SY 2013-14 requirement to offer at least half of the grains as WGR products. SFAs that receive an exemption will be considered compliant with the WGR requirements during an Administrative Review or a performance-based certification review if their grain offerings are consistent with the exemption granted by the State agency and at least half of the grains offered weekly are WGR.

SFAs are reminded that the FNS has a [Best Practices Sharing Center](#) which provides a forum to share information about WGR products. Additionally, SFAs should maximize the use of [Team Nutrition](#) materials to provide nutrition education that will help students and parents understand the benefits and uses of WGR products. Schools should continue to conduct taste tests and incorporate WGR products into student favorites to increase acceptability. Schools are also encouraged to incorporate Smarter Lunchroom techniques that encourage student selection and consumption of WGR products.

Additionally, the Smart Snacks in School interim final rule at 7 CFR Part 210.11(c)(3)(i) provides for an exemption from the Smart Snacks nutrient requirements only for entrees served in the National School Lunch Program and School Breakfast Program the day of and the day after service in the reimbursable school meal. All other grain products sold to students on the

school campus during the school day shall comply with the WGR standards specified in §210.11(c)(2)(ii) **and these items cannot be included in a Request for Exemption.**

Note that the Connecticut State Department of Education (CSDE) will be implementing this revised request for an exemption and that this operational memorandum (OM) supersedes OM [35-14, Flexibility for Whole Grain-rich Pasta in School Years 2014-15 and 2015-16, Questions and Answers attached – REVISED](#), which was issued October 2014 to address the temporary flexibility to use enriched pasta in school meals.

In order to request CSDE approval, the SFA must complete and e-mail the attached Request for Exemption from the Whole Grain-rich Requirement for School Meals form to their Child Nutrition Program technical assistance support consultant. (Include *Request for Exemption Whole Grain-rich Requirement* in the e-mail subject line.) Also, the request must provide evidence that an attempt was made to use the WGR products with negative outcomes. *Note that one of the SFA’s Authorized Signers of the Child Nutrition Program Agreement must sign the Request for Exemption.* SFAs must inform the State agency if there are any changes to the exemption request as appropriate.

**Any SFA that had requested a Pasta Waiver under SP47-2014 (v.2) from June 2014 through February 2015, must submit a Request for Exemption under the guidance of SP 20-2015.**

Questions may be directed to:

County	Consultant	Email	Phone Number
Fairfield	Fionnuala Brown	<a href="mailto:fionnuala.brown@ct.gov">fionnuala.brown@ct.gov</a>	860-807-2129
Hartford (towns/cities beginning with A-R)	Teri Dandeneau	<a href="mailto:teri.dandeneau@ct.gov">teri.dandeneau@ct.gov</a>	860-807-2079
Hartford (towns/cities beginning with S-W) & Windham County	Susan Alston	<a href="mailto:susan.alston@ct.gov">susan.alston@ct.gov</a>	860-807-2081
Litchfield County	Allison Calhoun-White	<a href="mailto:allison.calhoun-white@ct.gov">allison.calhoun-white@ct.gov</a>	860-807-2008
Middlesex & Tolland Counties	Andy Paul	<a href="mailto:andrew.paul@ct.gov">andrew.paul@ct.gov</a>	860-807-2048
New Haven	Jackie Schipke	<a href="mailto:jackie.schipke@ct.gov">jackie.schipke@ct.gov</a>	860-807-2123
New London	Monica Pacheco	<a href="mailto:monica.pacheco@ct.gov">monica.pacheco@ct.gov</a>	860-807-2073

JF:saa

Attachment

**Request for Exemption from the Whole Grain-rich (WGR) Requirement for School Meals**

Name of School \_\_\_\_\_ Agreement Number: \_\_\_\_\_  
Food Authority (SFA): \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: CT Zip: \_\_\_\_\_

In accordance with the United States Department of Agriculture (USDA) requirements for WGR exemptions in school nutrition programs, the above named SFA requests an exemption from the WGR requirement for school meals during school years 2014-15 and 2015-16. If granted, the exemption applies only while the SFA can demonstrate a continued negative impact.

**PART 1 – LIST OF GRAIN PRODUCTS** *(Include the specific products that are part of the SFA’s waiver request)*

**PART 2 – REASONS FOR REQUEST** *(Check all that apply)*

- A. Financial Hardship (Participation):** District/school records demonstrated a significant drop in meal counts after offering the WGR products listed above. *Attach supporting documentation.*
- B. Financial Hardship (Cost):** The district/school had a significant cost increase when procuring the WGR products listed above. *Attach supporting documentation.*
- C. Limited Product Availability:** The district/school does not have access to compliant WGR products in the local market and would like to offer enriched grain items temporarily. *Please describe:*
- D. Unacceptable Product Quality:** The WGR products listed above did not retain the desired texture or lost palatability during the typical holding time. *Please describe:*
- E. Poor Student Acceptability:** The WGR products listed above received significant negative student/parent feedback or increased plate waste when the district/school offered the WGR products multiple times and over a sustained period. *Please describe:*
- F. Other:** Undesirable results occurred when the district/school attempted to use WGR products. *Please describe:*

**PART 3 – EFFORTS TO COMPLY WITH WGR REQUIREMENT** *(Check all that apply)*

- The SFA sought technical assistance from the state agency or the manufacturer of the WGR products and followed product instructions. *Please describe:*
- Used alternative product types/brands. *List product description, manufacturer and product number:*
- Used alternative cooking methods or modified the recipe. *Please describe and provide recipes/production records:*

## WGR Exemption Request, continued

### PART 4 – PLAN FOR FUTURE COMPLIANCE

Describe the SFA's plan to achieve future compliance with the full WGR requirement *after* the exemption expires.

In accordance with the requirements specified in [Operational Memorandum 20-15](#), *Request for Exemption from the Whole Grain-rich Requirement for School Meals during School Years 2014-15 and 2015-16*, the above named SFA requests an exemption from the WGR requirement for school years 2014-15 and 2015-16. The individuals signing below certify that all information on this form is complete and accurate.

\_\_\_\_\_  
Signature of Food Service Director

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Authorized Signer

\_\_\_\_\_  
Date

**E-mail this *WGR Exemption Request* to your Child Nutrition Program [technical assistance support consultant](#). (Include *Request for Exemption Whole Grain-rich Requirement* in the e-mail subject line.)**

#### STATE AGENCY USE ONLY

SCHOOL YEAR 2014-15:  Request Approved\*  Request Denied

SCHOOL YEAR 2015-16:  Request Approved\*  Request Denied

**\*The SFA will comply with the SY 2013-14 requirement to offer at least half of the grains as WGR products.**

\_\_\_\_\_  
Signature of CSDE CNP Staff

\_\_\_\_\_  
Date

Comments:

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