




STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Sponsors of the National School Lunch Program

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

DATE: March 13, 2019

SUBJECT: Operational Memorandum No. 07-19
Compliance Issues with the Vegetables and Fruits Components for Grades K-12
in the National School Lunch Program (NSLP) and School Breakfast Program
(SBP)

During recent Administrative Reviews of the NSLP and SBP, the Connecticut State Department of Education's (CSDE) school nutrition programs staff has observed several common compliance issues with the vegetables and fruits components of the U.S. Department of Agriculture (USDA) NSLP and SBP meal patterns for grades K-12. These compliance issues include:

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

This memo provides guidance for school food authorities (SFA) on the requirements for the vegetables and fruits components, and how to avoid these compliance issues.

Offering Vegetable Subgroups on Multiple Serving Lines at Lunch

When SFAs have multiple serving lines or offer a variety of meals, the USDA requires that all food components must be available to all students on *every* serving line, in at least the minimum required amounts. For example, when schools have multiple serving lines with different menu items, each serving line must offer all of the vegetable subgroups during the week and provide the minimum weekly servings of the grains and meat/meat alternates components.

For the purposes of meeting the NLSP meal pattern requirements, menu planners should think of each serving line as its own entity. The daily and weekly requirements must be in place for *each* serving line. The following example shows how this requirement applies to the weekly vegetable subgroups.

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 (legumes subgroup) as the daily vegetables. To meet the weekly vegetable subgroups requirement, baked beans (or

another vegetable from the same vegetable 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 legume, such as garbanzo beans or lentils.

It is not acceptable for the SFA to 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 meal, including all vegetable subgroups on a weekly basis.**

A best practice to ensure that school lunch menus meet the weekly vegetable subgroups is for each serving line to offer a daily vegetable subgroup “rainbow” tray that contains a vegetable from each subgroup, such as carrots (red/orange), broccoli (dark green), corn (starchy), cucumbers (other), and marinated chickpeas (legumes). Offering a daily rainbow tray on each serving line meets the NSLP meal pattern requirements for the weekly vegetable subgroups. For more information on the vegetable subgroups, review the Connecticut State Department of Education’s (CSDE) guide handout, [Vegetable Subgroups in the NSLP](#).

Offering Vegetable Subgroups on One Serving Line with Multiple Lunch Choices

When SFAs offer a variety of meals on the same serving line, the USDA requires that all food components must be available to all students for *every* lunch, in at least the minimum required amounts. Each lunch choice on the serving line must offer students access to the *same* daily vegetable subgroups, unless that subgroup is offered again later in the week or the school offers a daily rainbow tray.

For example, 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, it must offer corn (or another starchy vegetable) on Tuesday. Otherwise, the students selecting cold lunch on Tuesday do not have access to all of the required weekly vegetable subgroups.

Note: As with multiple serving lines, offering a daily rainbow tray is a best practice to meet the NSLP meal pattern requirements for the weekly vegetable subgroups.

For detailed guidance on the fruits and vegetables components, see the CSDE’s [Menu Planning Guide for School Meals for Grades K-12](#). For crediting information, visit the [Vegetables Component](#) section and [Fruits Component](#) section of the CSDE’s Crediting Foods in School Nutrition Programs webpage.

Required Portion Sizes for Vegetables and Fruits

SFAs must always plan and offer the *minimum* daily serving of the fruits component and vegetables component for each grade group in the NSLP and SBP meal patterns. For information on the meal patterns for grades K-12, visit the CSDE’s [Meal Patterns for Grades K-12 in School Nutrition Programs](#) webpage.

Offer versus serve (OVS) has specific requirements for a reimbursable meal. Students must select at least ½ cup of fruits or vegetables and the full serving of two other meal pattern components for a reimbursable meal. Depending on the grade group being served, the 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, the lunch meal pattern for grades K-5 and 6-8 requires ¾ cup of the vegetables component and ½ cup of the fruits component. The lunch meal pattern for grades 9-12 requires 1 cup of the vegetables component and 1 cup of the fruits component. While OVS allows students to *select* less than the full planned serving of fruits and vegetables, SFAs cannot *offer* less than the serving required by the meal patterns. Table 1 shows the difference between the daily amount of fruits and vegetables required by the lunch meal pattern and student selections under OVS.

Table 1. Daily requirements for fruits and vegetables at lunch		
	Meal Pattern Requirements	OVS
Grades	Schools must plan and offer the full serving required by the meal pattern	Students must select
K-5 and 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

If schools offer all fruits and vegetables in ½-cup portions for OVS, students must be allowed to select an amount that provides at least the minimum amount required by the meal patterns. For example, at lunch for grades K-5 and 6-8, schools must offer ½ cup of the fruits component and ¾ cup of the vegetables component to all students. To meet these minimum requirements when serving ½-cup portions, schools must allow students to select one serving of fruit (½ cup) and up to two servings of vegetables (1 cup).

In this example, students can choose to *select* only ½ cup of vegetables with OVS, but schools cannot *offer* students only ½ cup of vegetables because the meal pattern for grades K-5 and 6-8

requires $\frac{3}{4}$ 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. For information on the signage requirements, see “Meal Identification Signage” below.

For detailed guidance on the OVS requirements for fruits and vegetable for grades K-12, see the CSDE’s *Offer versus Serve Guide for School Meals*, and visit the CSDE’s [OVS](#) webpage.

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 use meal identification signage that reflects the daily menu’s planned servings for each grade group. This signage must:

- identify all components of the full planned meal; and
- instruct students on the minimum components that they must select for a reimbursable meal under OVS.

Signage must be near or at the beginning of the serving line, prior to the point-of-service (POS), and located on the serving line near each food component, as applicable, to prevent unintentional purchases of a la carte items and help students choose a reimbursable meal. This requirement applies to all schools and institutions that participate in the NSLP and SBP, including those that implement family-style meal service.

The CSDE requires that signage regarding what and how much students can take must be located at all applicable points in the serving line *where the food components are available*. For example, if a high school offers fruits and vegetables in $\frac{1}{2}$ -cup servings and allows students to select two servings of fruits and two servings of vegetables to meet the minimum daily 1-cup requirement, the cafeteria signage must clearly communicate that students are allowed to select up to two servings of fruits and up to two servings of vegetables with each meal. This signage must be on the serving line where the fruit and vegetable options are located.

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. In addition to the required signage, schools could display a sample lunch tray of the full reimbursable meal.

The CSDE strongly encourages SFAs to provide detailed information on food items and choices whenever possible, within the constraints of the menu and serving line. This helps promote the school nutrition programs and makes it easier for students to understand exactly what school meals include.

Whenever possible, a best practice is to offer all vegetable choices in the same location and all fruit choices in the same location. This assists in identifying all available fruit and vegetable choices, and encourages students to select fruits and vegetables.

Note: SFAs must clearly identify all a la carte items available for sale, with pricing at the location where they are offered for sale. Signage must clearly communicate that a la carte items are not meal components and are not part of reimbursable meals.

Questions may be directed to your school nutrition consultant.

Consultants for School Nutrition Programs	
County	Consultant
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Important: This is a numbered Connecticut State Department of Education (CSDE) operational memorandum that contains important program information. Please read carefully and retain for future reference. All CSDE operational memoranda are posted on the CSDE’s [Operational Memoranda for School Nutrition Programs](#) webpage.