

The Wellspring Schools Dietary and Nutrition Policy

Adapted from the United States Department of Agriculture Food and Nutrition Service

The National School Lunch Program (NSLP) is a federally assisted meal program operating in public and nonprofit private schools and residential child care institutions. It provides nutritionally balanced, low-cost or no-cost lunches to children each school day. The program was established under the Richard B. Russell National School Lunch Act, signed into law by President Harry Truman in 1946.

The following contains guidance materials relating to National standards for the National School Lunch Program and School Breakfast Program.

Regulations

Three menu planning flexibilities:

- First, it will broaden the milk options in the National School Lunch Program and School Breakfast Program by allowing local operators to permanently offer flavored, low-fat milk. For consistency across nutrition programs, it will also allow flavored, low-fat milk in the Special Milk Program for children ages 6 and older.
- Second, this final rule will require that half of the weekly grains in the school lunch and breakfast menu be whole grain-rich, thus ending the need for the exemption process.
- Third, it will provide schools in the lunch and breakfast programs more time for gradual sodium reduction by retaining Sodium Target 1 through the end of school year (SY) 2023-2024, continuing to Target 2 in SY 2024-2025, and eliminating the Final Target that would have gone into effect in SY 2022-2023.

By codifying these changes, USDA acknowledges the persistent menu planning challenges experienced by some schools, and affirms its commitment to give schools more control over food service decisions and greater ability to offer wholesome and appealing meals that reflect local preferences.

Smoothies Offered in Child Nutrition Programs

As fruit, vegetables, milk, and yogurt, smoothies are an increasingly common food item in the child nutrition programs (CNP), the Food and Nutrition Service (FNS) has modified the guidance on smoothies to allow for the crediting of vegetables and yogurt including smoothies with yogurt at lunch. These additional ingredients provide variety to food service operators seeking to include appealing and nutritious smoothies on their menus. This memorandum replaces previous guidance on smoothies, addresses the crediting of vegetables and yogurt in smoothies, and clarifies the use of fruit concentrates in CNP.

Offer versus Served

Offer versus Serve (OVS) is a provision in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) that allows students to decline some of the food offered. The goals of OVS are to reduce food waste in the school meals programs while permitting students to decline foods they do not intend to eat. This is optional at all grade levels for breakfast and required at the senior high school level only for lunch. This guidance is intended to clarify the requirements of OVS, specifically related to what students must take in order to have a reimbursable meal.

Grain Requirements for the National School Lunch Program and School Breakfast Program

The meal patterns for the NSLP and the SBP include quantities of grains based on ounce equivalencies (oz eq) in a manner that is consistent with the DGAs and the USDA food guidance system known as MyPlate. The amounts of food included in the meal pattern, including the amount of oz eq of grains, were carefully determined through an extensive review and assessment to meet 24 nutrient targets.

I. CRITERIA FOR DETERMINING ACCEPTABLE GRAINS FOR SCHOOL MEAL PROGRAMS

The requirements to offer whole grain-rich products must meet the whole grain-rich criteria. For breakfast, half of the grains offered during the school week must meet the whole grain-rich criteria. 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 oz eq requirements for the grains component as defined by this guidance.

Element 2: The food must meet at least one of the following:

- a. The whole-grain content per oz eq based on the product packaging or by the manufacturer, if available.
- b. The product includes the following Food and Drug Administration-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.”
- c. The product ingredient declaration lists whole grains first, specifically:

I. Non-mixed dishes (e.g., breads, cereals): whole grains must be the primary ingredient by weight (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 were the primary ingredient by weight since the combined 60% whole grain ingredients are greater than the enriched wheat flour at 40% although the enriched flour may be listed first in the ingredient declaration.

II. Mixed dishes (e.g., pizza, corn dogs): whole grains must be the primary grain ingredient by weight (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 exceed 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, etc., program operators will need to know either that the whole grain content is at least 8.0 grams per oz eq 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, the ingredients or the grain product must meet the Food and Drug Administration's standards of identity for enrichment. Bran and ger, are non-creditable in school meal programs. Non-creditable grain ingredients in products at very low levels used as processing aids are allowable at levels less than 2-percent.

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 oz eq. Grain products must be credited using the oz eq method.

This criterion is applied to various products as follows:

- Baked goods, such as breads, biscuits, bagels, etc., require 16 grams of creditable grain ingredients in order to provide 1 oz eq credit.
- For cereal grains such as oatmeal, pasta, and brown rice, a 1-ounce equivalent is 28 grams (approximately 1.0 ounce by weight) of dry product. Since these grains are served cooked and water is added in preparation, the cooked volume equivalent is $\frac{1}{2}$ cup cooked cereal, pasta, or rice.
- For ready-to-eat (RTE) breakfast cereal, 28 grams or 1.0 ounce of product is considered an ounce equivalent. The ounce equivalent volumes are 1 cup flakes or rounds, 1.25 cups puffed cereal, and $\frac{1}{4}$ cup granola. As with baked goods, we recognize 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 oz eq to meet a 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 (2.0) oz eq grains per week may be in the form of a grain-based desserts. Battered and/or breaded products offered will not need to be counted toward the maximum weekly grain requirements in the meal pattern. All grains which are part of battered and or breaded products offered must be counted towards the weekly grain requirement. Program operators are strongly encouraged to offer food items that are low in added sugars, sodium, and saturated fat in order to meet these requirements and provide foods which are consistent with the Dietary Guidelines for Americans.

Formulated Grain Fruit Products

Formulated grain-fruit products will no longer be allowed to satisfy both the grain and fruit component for the School Breakfast Program (SBP). These products were formulated to satisfy the bread and fruit component of the meal pattern through fortification without the addition of any actual fruit ingredients, at a time when the adequacy of cooking and serving facilities were of concern for students participating in the SBP.

Formulated grain-fruit products are specific products that have been accepted by the Food and Nutrition Service (FNS) for use in the USDA Child Nutrition Programs to meet one bread/bread alternate and the fruit/vegetable requirement in the breakfast pattern.

Tofu and Soy Yogurt Products in the School Meal Programs

Since meals served through the School Meal Programs and CACFP are an opportunity for children to learn how to build a healthy plate, foods served should be easily recognized by children as part of a food group that contributes to a healthy meal.

Tofu is widely recognized as a meat substitute, comes in a variety of textures (for example, silken, soft, firm, and extra firm) and may be served in a variety of ways, including in culturally appropriate and traditional dishes. Firm or extra firm tofu in stir-fries, omelets, and miso soup may credit towards the meat alternate component. However, soft or silken tofu that is incorporated into drinks, such as smoothies, or other dishes to add texture or improve nutrition, such as in baked desserts, does not credit toward the meat alternate component.

Meat substitute products such as links and sausages made from tofu are also easily recognizable as meat substitutes and can be included in a meal. When considering processed tofu products such as links and sausages made from tofu as meat alternates for the reimbursable meal, the tofu ingredient must contain the required 5 grams of protein, which is not shown on a nutrition facts label.

Therefore, the most appropriate way to ensure that the product meets the requirements outlined in this memorandum is to request that the product be manufactured under the Child Nutrition Labeling Program following a Federally-approved quality control program. In circumstances where a Child Nutrition Labeled product is not available, program operators can use Product Formulation Statements (PFS) from the manufacturer to document how the product meets Child Nutrition Program requirements.

FRUITS AND VEGETABLES

Schools may offer fruits that are fresh; frozen; canned in light syrup, water or fruit juice; or dried. Pasteurized, full-strength (100%) fruit juice may also be offered in either liquid or frozen form.

Schools may offer fresh, frozen, or canned vegetables; and dry beans and peas (legumes). Over the course of the week, schools must offer all vegetable subgroups: dark green, red/orange, dry beans/peas (legumes), starchy, and “other” vegetables. Vegetables are an option for breakfast.

To meet the fruit and the vegetables components, the minimum serving size is $\frac{1}{8}$ cup (for example, $\frac{1}{4}$ cup for raw, leafy greens and $\frac{1}{8}$ cup for dried fruit). For clarification, this serving size is different from the $\frac{1}{2}$ cup of fruits or vegetables required for a meal selected by a student under OVS.

Full-strength vegetable juice blends that contain vegetables from the same subgroup may contribute toward that vegetable subgroup. Vegetable juice blends containing vegetables from more than one subgroup contribute to the “additional” vegetable subgroup. For example, a full-strength carrot/tomato vegetable juice blend may credit toward the “red/orange” vegetable subgroup. However, a full-strength vegetable juice blend containing carrots, spinach, tomato and watercress, may only credit toward the “additional” vegetable subgroup. Only half of the weekly vegetables may be offered in the form of full-strength juice.

MEAT/MEAT ALTERNATE

Schools have discretion to offer a meat/meat alternate in place of grains after the minimum daily grains requirement (1 ounce equivalent) is met. Schools may also offer a meat/meat alternate as an extra if it fits within the weekly dietary specifications.

When considering processed tofu products, such as links and sausages made from tofu, as meat alternates for the reimbursable meal, the tofu ingredient must contain the required 15.5 grams of protein per 2.2 ounces by weight. However, the additional ingredients beyond the tofu in a meat substitute, such as tofu sausage are also included on the nutrition label. Therefore, the protein amount listed on the label for the meat substitute does not necessarily indicate the protein of the tofu for verification of FNS tofu requirements. This information would need to be obtained from the tofu manufacturer.

The menu planner determines the daily amounts for meat/meat alternate and grains provided that at least 1 oz. eq. of each (i.e., the daily minimum) is offered daily to grades K-8. On some days, the school must offer more than 1 oz. eq. to meet the minimum

weekly requirements for the grains and meat/meat alternate components. The menu planner has the flexibility to determine when to offer more than 1 oz eq. to meet the required weekly minimums.

GRAINS

Product ingredient listing lists whole grain first, specifically:

Non-mixed dishes (e.g., breads, cereals): Whole grains must be the primary ingredient by weight

Mixed dishes (e.g., pizza, corn dogs): Whole grains must be the primary grain ingredient by weight

All grains equal to or greater than 0.25 oz eq (including battered and/or breaded products) must be counted towards the weekly grains requirement. If a product contains grains in amounts of less than 0.25 oz eq, such grains are not considered and, therefore, not counted toward the daily and weekly requirements.

MILK

Only fat-free (unflavored and flavored) and low-fat (1%) milk (unflavored) may be offered as part of the meal for children in grades K to 12. This requirement also applies to the meal pattern for Pre-K students, ages 3 and 4.

SODIUM

The sodium limit applies to the average meal offered during the school week. It does not apply daily or per meal. Menu planners may be able to offer a relatively high sodium meal or high sodium food at some point during the week if meals with lower to moderate sodium content are offered the rest of the week.

TRANS FAT

If there is trans fat listed on the nutrition facts panel of a product containing meat or dairy, the School Food Authority (SFA) should request documentation from the manufacturer that reports the source of the trans fat.

For commercially prepared products, schools must refer to the nutrition facts panel or manufacturer's specifications to determine that there are zero grams of trans fat per serving. For mixed dishes that may contain both naturally occurring trans fat (e.g., beef) and added/synthetic trans fat (partially hydrogenated oil), the only certain way to determine if the product is in compliance is for schools to request information from suppliers on how much of the trans fat is naturally occurring versus if any of the ingredients contain added (synthetic) trans fat.

CALORIES

Schools are allowed, on a case-by-case basis, to offer age-appropriate meals to individual students in unique situations (for example: a 16-year old teen with developmental issues placed with age/grade group K-5). The State agency may require the school/School Food Authority to seek permission prior to deviating from the required meal pattern for the prevalent age/grade group. This is important because the State agency is responsible for promoting proper implementation of the meal requirements.

The weekly calorie ranges apply to the school meal offered on average over the week, and not per student. Schools may offer a variety of meals with different calorie levels to meet the needs of students or choose to allow students to take second servings of some foods. Furthermore, students may purchase additional food a la carte.

The calorie minimum and maximum levels (and related food portions for various components) are based on data pertaining to children's healthy weight, physical activity level, and opportunities for meals and snacks outside of the school meals programs. While these calorie levels are comparable to the previous minimum calorie standards, the updated school meals offer adequate amounts of nutrients and food. Schools now offer nutrient-dense meals that provide children more fruits, vegetables, and whole grains than specified by the previous meal patterns.

MULTIPLE OFFERINGS

Daily minimum – example: In grades 9-12, the minimum daily grain requirement for lunch is 2 oz eq. So, if a student is offered a choice between pizza with 2 oz eq of grain OR a stir fry with a 1 ounce equivalent of grains, only 1 of those offerings meets the 2 ounce minimum. The student would need to have another ounce equivalent offered with the stir fry, such as a side item, in order to meet the daily grains minimum.

Weekly minimum – example 1: School Food Authorities (SFAs) must also offer a weekly menu that meets the weekly minimum requirements for grains and meats/meat alternates. For grades K-5 and 6-8, the daily grains minimum for lunch is only 1 oz eq and the weekly grains minimum is 8 oz eq. The offering of the minimum of only 1 oz eq daily would only total 5 oz eq across the week. So, on some days, schools must offer more than 1 oz eq of grains as a minimum offering. The same applies to the weekly minimum amount of meats/meat alternates

Weekly minimum – example 2: If a grade K-5 school offers a 1 oz eq grain item (salad) and a 3 oz eq grain item (pizza) every day (and instructs the student to select one option only), the minimum weekly offering is 5 oz eq grain (1 oz eq x 5 days). This menu would not meet the required weekly minimum for lunch of 8 oz eq.

Accommodating Children with Special Dietary Needs in the School Nutrition Program

Schools participating in a federal Child Nutrition Program (School Lunch, School Breakfast or After School Snack Program) are required to make accommodations for children who are unable to eat the school meals because of a disability that restricts their diet. In order to make modifications or substitutions to the school meal, schools must have a written Medical Statement on file that is signed by a State recognized medical authority (licensed physician, physician assistant, certified registered nurse practitioner, or dentist). The statement must identify:

- The child's disability
- An explanation of why the disability restricts the child's diet
- The major life activity affected by the disability
- The food(s) to be omitted from the child's diet
- The food or choice of foods that must be provided as the substitute

Accommodating Students with Non-Disabling Special Dietary Needs

Schools may, at their discretion, make substitutions for students who have a special dietary need that does not meet the definition of disability. Examples include food intolerances or allergies that do not cause life-threatening reactions. The decision to accommodate a student's special dietary need can be determined on a case-by-case basis; however, the school should remain consistent with accommodating special dietary needs. In order to make modifications or substitutions to the school meal, schools must have a written Medical Statement signed by a State recognized medical authority (licensed physician, physician assistant, certified registered nurse practitioner, or dentist) identifying the following:

- An identification of the medical or other special dietary condition that restricts the child's diet
- The food or foods to be omitted from the child's diet
- The food or choice of foods to be substituted

Fluid Milk Substitutions for Students with Non-Disabling Special Dietary Needs

For students with non-disabling special dietary needs that restrict their intake of fluid milk, the following applies:

- Parents/guardians or a recognized medical authority (physician, physician assistant, certified registered nurse practitioner, or dentist) may request a fluid milk substitute for a student with a non-disabling medical dietary need, such as milk intolerance, or due to cultural, religious or ethnic beliefs. The request must be made in writing.
- The written request from a parent/guardian or medical authority must identify the student's medical or special dietary need that prevents them from consuming cow's milk. Specifically referring to milk substitutions, a "special dietary needs," can refer to cultural, ethnic, or religious needs, as well as medical needs.

- Non-dairy beverages offered as a fluid milk substitute must meet the established nutrient standards.
- Juice and water cannot be substituted for fluid milk as part of the reimbursable meal. However, any student may select a meal without milk under Offer vs. Serve. Drinkable water must be available to all students in addition to the meal. Juice can be selected as a meal component if it is offered.

School Food Service Responsibility

- Provide food substitutions for students according to the Medical Statement. The school food service staff may not revise or change a diet prescription or medical order.
- Provide training to cafeteria personnel on how to properly accommodate students with special dietary needs. Maintain documentation of this training.
- Communicate with parents, staff, and medical authorities regarding diet modifications.
- Maintain a Medical Statement on each student with a special dietary need. Diet orders are not required to be renewed on a yearly basis; however, PDE recommends that you confirm, on a yearly basis, the diet order has not changed. If there are any changes to the diet, a new Medical Statement is required.
- If the school is opting to make a milk substitute available for non-disabling dietary needs, research products to ensure they meet the USDA nutrient standards for a milk substitute.