DATE: February 25, 2013

MEMO CODE: SP 26-2013

SUBJECT: Extending Flexibility in the Meat/Meat Alternate and Grains Maximums for School Year 2013-14

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

On December 20, 2012, Food and Nutrition Service (FNS) issued policy memorandum SP 11-2013 REVISED, which gave State and local operators flexibility in meeting the weekly maximums for grains and meat/meat alternates in the National School Lunch Program for compliance purposes in School Year (SY) 2012-2013. The memorandum stated that State agencies should consider any school food authority (SFA) compliant with the weekly ranges for these two components if the FNS-developed or FNS-approved Certification Tool and required supporting documentation indicate the menu is compliant with the daily and weekly minimums.

Since issuance of SP 11-2013, school food service operators, State agencies, industry members and other stakeholders have asked FNS to issue clear guidance to assist them with planning and procurement for SY 2013-14. Therefore, and as discussed below, this memorandum extends the flexibility in assessment of the weekly maximums for grains and meats/meat alternates through SY 2013-14 for both breakfast and lunch.

In addition, we understand the need for longer term guidance on this issue, and are currently considering options for addressing this flexibility beyond next year. We continue to welcome input from a broad range of program stakeholders and interested parties regarding the impact of this flexibility.

IMPLEMENTATION EXPERIENCES DURING SCHOOL YEAR 2012-13

Since FNS memo SP 11-2013 was issued, we have received significant feedback from State agencies and SFAs requesting an extension of this flexibility for future years. Our State agency and SFA partners continue to identify notable operational challenges in meeting the weekly maximums for the grains and meats/meat alternates components. The three primary challenges we continue to hear about are 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. FNS 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 meats/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. We know that product reformulation is continuing and will be needed to allow SFAs to meet all the requirements associated with the new meal patterns. However, we also recognize that modification of some grain and meat/meat alternate products has been more challenging. The Department of Agriculture (USDA) continues its own efforts to obtain some USDA Foods in appropriate serving sizes, notably poultry.

**Student Acceptability**

Finally, FNS recognizes that school meals must be selected and ultimately consumed by students in order 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 instance, 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.

**IMPACT ON MEAL PATTERN COMPLIANCE**

The weekly maximums included in the final rule for grains and meats/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 SY 2012-13 through our 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.

We also have 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 SY 2009-10, before the weekly maximums for grains and meats/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, FNS is extending the flexibility for both breakfast and lunch through SY 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 meats/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, State agencies are encouraged to work with SFAs to assist them in meeting the new requirements. We anticipate that the flexibility in compliance assessment reflected in this memorandum will continue to facilitate implementation of the new meal pattern in SY 2013-14. As previously described, feedback from SFAs and State agencies continues to be welcomed.

State agencies are reminded to distribute this memorandum to program operators immediately. SFAs should contact their State agencies for additional information. State agencies may direct any questions concerning this guidance to the appropriate Food and Nutrition Service Regional Office.

Sincerely,

Cynthia Long
Director
Child Nutrition Division