



Food and
Nutrition
Service

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Park Office
Center

SUBJECT: Updated Infant and Preschool Meal Patterns in the National School Lunch Program and School Breakfast Program; Questions and Answers

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TO: Regional Directors
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On April 25, 2016, the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) published the final rule, "Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010" (81 FR 24348) to update the National School Lunch Program's and School Breakfast Program's (School Meal Programs) meal pattern requirements for infants and preschoolers under 7 CFR 210.10 and 220.8. The purpose of this memorandum is to provide all provisions of the rule that apply to schools in one document for easy reference. The memorandum also includes Questions and Answers in Attachment B. Schools serving meals to infants and children ages 1 through 4 years old (preschoolers) must comply with these updated meal pattern requirements no later than October 1, 2017. This memorandum supersedes SP 35-2011, CACFP 23-2011, *Clarification on the Use of Offer Versus Serve and Family Style Meal Service*, May 17, 2011, as it applies to the School Meal Programs.

While many of the changes to the infant and preschool meal patterns make them more consistent with the requirements for older grade groups (K through 12th grade), some of the meal pattern requirements for infants and preschoolers are different. The infant and preschool meal patterns are specifically designed for this younger age group and their nutritional needs. Taste preferences are formed early in a child's life and meals served to infants and preschoolers are a critical part of establishing healthy habits that will last a lifetime. With this in mind, the updated infant and preschool meal patterns ensure the meals provided in the School Meal Programs contribute to children's wellness, healthy growth, and development. To assist schools in the transition to the updated meal patterns, FNS compiled a chart that highlights the primary differences between the preschool meal patterns and older grade meal patterns in Attachment A.

I. INFANT MEAL PATTERNS

The key changes to the infant meal patterns include:

- Two age groups (birth through 5 months and 6 through 11 months), simplified from three age groups;
- The introduction of solid foods is delayed from 4 months of age to 6 months of age (as developmentally appropriate);
- Juice, cheese food, and cheese spread are no longer creditable;
- Yogurt is creditable as a meat alternate;
- Whole eggs are creditable as a meat alternate;
- Ready-to-eat cereals may be served at snack;
- Meals may be reimbursed when a mother chooses to directly breastfeed her infant on-site; and
- Deep fat-fried foods (cooked by submerging in hot oil or other fat) that are prepared on-site cannot be part of a reimbursable meal.

The updated infant meal patterns for lunch and afterschool snack are established under 7 CFR 210.10(q) and (o)(4), respectively. The updated infant meal pattern for breakfast is established under 7 CFR 220.8(p).

The infant meal pattern requirements in the School Meal Programs are the same as the infant meal pattern requirements in the Child and Adult Care Food Program (CACFP) under 7 CFR 226.20(b). Therefore, schools serving meals or afterschool snacks to infants should refer to memorandum CACFP 02-2018, *Feeding Infants and Meal Pattern Requirements in the Child and Adult Care Food Program; Questions and Answers* (<https://www.fns.usda.gov/cacfp/feeding-infants-and-meal-pattern-requirements-child-and-adult-care-food-program-questions-1>) for additional guidance. The memorandum describes the requirements for creditable infant formula, breastfeeding on-site, serving solid foods, parent or guardian provided components, and offers a comprehensive list of questions and answers. All of the requirements outlined in CACFP 02-2018 apply to schools serving meals and snacks to infants.

II. PRESCHOOL MEAL PATTERNS

Fluid Milk Requirements

One Year Olds

Under the updated preschool meal patterns, 1 year old children must be served whole, unflavored milk. This is consistent with recommendations from the National Academy of Medicine. FNS understands that a transition period is needed when infants are weaned from breastmilk or infant formula to cow's milk. Therefore, a one month transition period is allowed for children 12 to 13 months of age to allow them time to adjust to cow's milk.

Please note, breastmilk is considered an allowable fluid milk substitute for children of any age, if a mother chooses to breastfeed her child past 1 year of age.

Preschoolers 2 Years Old Through 4 Years Old

Under the updated preschool meal patterns, milk served to children 2 years old through 4 years old must be unflavored low-fat (1 percent) or unflavored fat-free (skim) milk. Unflavored milk contains all the major nutrients also found in flavored milk. However, flavored milk (commercially prepared and plain milk that is flavored with syrup, powder, or straws) also contains added sugars. To better align with the Dietary Guidelines' recommendation to reduce the consumption of added sugar and to help children develop healthy eating practices, flavored milk is no longer allowed in reimbursable meals for preschoolers.

Allowable milks for preschoolers 2 years old through 4 years old include low-fat or fat-free milk, low-fat or fat-free lactose reduced milk, low-fat or fat-free lactose free milk, low-fat or fat-free buttermilk, low-fat or fat-free cultured milk, or low-fat or fat-free acidified milk. FNS recognizes that switching immediately from whole milk to low-fat or fat-free milk when a child turns 2 years old may be challenging. For that reason, FNS is granting a one-month transition period. Meals served to preschoolers 24 months to 25 months old that contain whole milk or reduced-fat milk (2 percent) may be part of a reimbursable meal.

As currently required, milk must be pasteurized fluid milk that meets State and local standards. Schools are not required to offer a variety of milks when serving meals to preschoolers. In addition, schools continue to have the flexibility to serve non-dairy beverages to preschoolers who cannot consume fluid milk due to a non-disability need, upon parent or guardian request.

For more information on the fluid milk and non-dairy beverage requirements for children 1 through 4 years old, please refer to memorandum CACFP 17-2018, *Nutrition Requirements for Fluid Milk and Fluid Milk Substitutions in the Child and Adult Care Food Program, Questions and Answers* (<https://www.fns.usda.gov/cacfp/nutrition-requirements-fluid-milk-and-fluid-milk-substitutions-cacfp-qas>). The fluid milk and non-dairy beverage requirements for 1 through 4 year old children outlined in CACFP XX-2017, also apply to schools serving meals and snacks to preschoolers.

Grain Requirements

Whole Grain-Rich

At least one serving of grains per day must be whole grain-rich under the updated preschool meal patterns. Whole grain-rich foods are foods that contain 100 percent whole grains or that contain at least 50 percent whole grains and the remaining grains in the food are enriched. This requirement does not apply to the infant meal patterns. Schools are

encouraged to serve whole grain-rich foods to infants to promote acceptance of those foods later in life.

For more information on how to identify foods that meet the whole grain-rich criteria in the preschool meal patterns, please refer to memorandum CACFP 01-2018, *Grain Requirements in the Child and Adult Care Food Program; Questions and Answers* (<https://www.fns.usda.gov/cacfp/grain-requirements-child-and-adult-care-food-program-questions-and-answers>).

Grain-Based Desserts

The Dietary Guidelines recommend limiting consumption of added sugars and saturated fats as part of a healthy eating pattern, and identify grain-based desserts as sources of added sugars and saturated fats. To better align the infant and preschool meal patterns with the Dietary Guidelines, grain-based desserts cannot count towards the grain requirement at any meal or snack under the updated preschool meal patterns. This will help reduce the amount of added sugars and saturated fats children consume, which, as a percent of calories, is particularly high in children.

The exclusion of grain-based desserts for infants and preschoolers is slightly different from the grain-based dessert requirement for older grade groups in the School Meal Programs. Up to 2 ounce equivalents of grain-based desserts per week at lunch are allowed for older grade groups. These requirements vary slightly from each other because research indicates that flavor and food preferences are shaped early in life. Therefore, it is important to help establish healthy habits in the School Meal Programs' youngest participants when their taste preferences are being developed.

FNS recognizes that schools may occasionally want to serve grain-based desserts to preschoolers, such as for celebrations or other special occasions. It is important to remember that schools continue to have the flexibility to serve grain-based desserts as an additional food item that is not part of a reimbursable meal.

Grain-based desserts are those items that are denoted with a superscript 3 or 4 in "Exhibit A: Grain Requirement for Child Nutrition Programs" (Exhibit A) in CACFP 16-2017, *Grain-Based Desserts in the Child and Adult Care Food Program* (<https://www.fns.usda.gov/cacfp/grain-based-desserts-child-and-adult-care-food-program>). The following foods are considered grain-based desserts: cookies, sweet pie crusts, doughnuts, cereal bars, breakfast bars, granola bars, sweet rolls, toaster pastries, cake, and brownies. Please note, sweet crackers (e.g. graham and animal crackers) are not considered grain-based desserts in the infant and preschool meal patterns. FNS provided this flexibility in policy memorandum CACFP 16-2017, *Grain-Based Desserts in the Child and Adult Care Food Program* (<https://www.fns.usda.gov/cacfp/grain-based-desserts-child-and-adult-care-food-program>) and is applicable to the School Meal Programs' infant and preschool meal patterns.

If a menu planner is thinking about serving a grain that is not specifically identified in Exhibit A, he or she should consider the common perception of the grain and if it is viewed as a dessert, sweet item, or treat. In these situations, menu planners should work with their State agency to determine if the grain is considered a grain-based dessert. Menu planners should also be aware that even if a product is not labeled as a traditional dessert item, it may contain higher levels of added sugars or saturated fats. Menu planners should use their discretion when serving these foods.

Breakfast Cereals

Beginning October 1, 2017, breakfast cereals served to infants and preschoolers must contain no more than 6 grams of sugar per dry ounce (21.2 grams of sugar per 100 grams of dry cereal). Breakfast cereals include ready-to-eat cereals and instant and hot cereals. However, only ready-to-eat cereals are creditable in the infant meal patterns. Infant cereals are not considered breakfast cereals. This new requirement will help further reduce infants' and preschoolers' intake of added sugars, as recommended by the Dietary Guidelines.

There are several ways to determine if a breakfast cereal is within the sugar limit. Schools may use any of the following methods to determine if a breakfast cereal meets the sugar limit:

1. Use any State agency's Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) approved breakfast cereal list. Similar to CACFP, all WIC-approved breakfast cereals must contain no more than 6 grams of sugar per dry ounce (21.2 grams of sugar per 100 grams of dry cereal).
2. Use USDA's Team Nutrition training worksheet *Choose Breakfast Cereals That Are Low in Added Sugar* (<https://www.fns.usda.gov/tn/cacfp-meal-pattern-training-tools>). The worksheet includes a chart with common breakfast cereal serving sizes and the maximum amount of sugar the breakfast cereal may contain per serving.
3. Use the Nutrition Facts Label on the breakfast cereal packaging to calculate the sugar content per dry ounce.
 - First, find the serving size in grams at the top of the Label and the sugars listed towards the middle.
 - Next, divide the total sugars by the serving size in grams.
 - If the answer is equal to or less than 0.212, then the cereal is within the required sugar limit and may be creditable.
4. Use an FNS-provided alternate calculation that uses rounding and aligns with the Team Nutrition training worksheet noted above:
 - First, find the serving size in grams at the top of the Label.

- Multiply the serving size in grams by 0.212.
- If the answer in step 2 ends in 0.5 or more, round the number up to the next whole number. If the answer in step 2 ends in 0.49 or less, round the number down to the next whole number. For example, if the answer in step 2 is 4.24, it is rounded down to 4.
- Next, find the Sugars listed towards the middle of the Nutrition Facts Label.
- Compare the number from Step 4 with the number in Step 3. If the number from Step 4 is equal to, or less than, the number in Step 3, the cereal meets the sugar limit and may be creditable.

As long as a breakfast cereal meets the sugar limit using at least one of the methods described above, it is considered within the sugar limit. As a reminder, breakfast cereals must meet the sugar limit and be whole grain-rich, enriched, or fortified to be creditable in the infant and preschool meal patterns.

For more information on the breakfast cereal sugar limit, including questions and answers, please see CACFP 01-2018, *Grain Requirements in the Child and Adult Care Food Program; Questions and Answers* (<https://www.fns.usda.gov/cacfp/grain-requirements-child-and-adult-care-food-program-questions-and-answers>).

Ounce Equivalents

Beginning October 1, 2019, grains in the infant and preschool meal patterns will be credited using ounce equivalents instead of “servings.” While FNS is not requiring the use of ounce equivalents until October 1, 2019, schools may use ounce equivalents at any time. This is because an ounce equivalent is slightly heavier (16 grams of grain) than a “serving” (14.75 grams of grains). Therefore, the ounce equivalent meets the minimum quantity for the grains component. Schools may refer to the Exhibit A in CACFP 16-2017, *Grain-Based Desserts in the Child and Adult Care Food Program* (<https://www.fns.usda.gov/cacfp/grain-based-desserts-child-and-adult-care-food-program>) for the appropriate ounce equivalent serving sizes.

Vegetable and Fruit Requirements

Components

In the updated preschool meal patterns, there are separate vegetable and fruit components at lunch and afterschool snacks. Separate vegetable and fruit components at lunch and afterschool snack will help increase the variety of vegetables and fruits served and consumed by preschoolers, as recommended by the Dietary Guidelines. This change means that preschoolers are served a vegetable and a fruit at lunch, consistent with the meal

pattern for older grade groups. In addition, an afterschool snack with a vegetable and fruit in the appropriate minimum serving sizes is now reimbursable.

To increase flexibility in menu planning, schools may choose to serve preschoolers two vegetables at lunch, rather than a serving of vegetables and a serving of fruit. For example, the fruit component at lunch may be substituted by an additional vegetable as long as the substituted vegetable is at least the same serving size as the fruit it replaced. When two vegetables are served at lunch, they must be two different kinds of vegetables. However, because there are no vegetable subgroup requirements in the preschool meal patterns, the two different kinds of vegetables do not need to be from different vegetable subgroups (e.g., dark green vegetables, red/orange vegetables, starchy vegetables, beans and peas (legumes), and other vegetables). For example, a preschool lunch with a serving of carrots and a serving of red peppers (both in the red and orange vegetable subgroup) would be allowable. Please note, schools may not serve two fruits at lunch under the updated preschool meal patterns.

Vegetables and fruits are one combined component at breakfast meals served to preschoolers. Similar to the School Breakfast Program (SBP) meal pattern requirements for older grade groups, schools may choose to serve vegetables, fruits, or a combination of both at breakfast for preschoolers. However, unlike SBP, there are no vegetable subgroup requirements in the preschool breakfast meal pattern.

Juice

Under the updated preschool meal patterns, full-strength (100 percent) fruit juice or full-strength (100 percent) vegetable juice may be used to meet the entire vegetable or fruit requirement at only one meal or snack per day. For example, if a school serves preschoolers breakfast and lunch, juice may be served at either breakfast or lunch, but not at both meals. Please see Question 2 and 3 in the attached Questions and Answers for more information about serving juice. Additionally, please be aware that the juice limit for preschoolers is different from the juice limit for older grade groups in the School Meal Programs. For all older grade groups, juice may be used to meet no more than one-half of the weekly fruit or vegetable requirement.

The limits on juice in the CNPs are based on the Dietary Guidelines' recommendation that at least half of the fruits consumed per day should come from whole fruits (fresh, canned, frozen, or dried). While 100 percent juice can be part of a healthful diet, it lacks the dietary fiber found in whole vegetables and fruits and, when consumed in excess, it can contribute to extra calories.

For more information on the separate vegetable and fruit components at lunch and afterschool snack and the juice limit, please see memorandum CACFP 09-2017, *Vegetable and Fruit Requirements in the Child and Adult Care Food Program; Questions and Answers* (<https://www.fns.usda.gov/cacfp/vegetable-and-fruit-requirements-cacfp-qas>). Because the infant and preschool meal patterns in the School Meal Programs match the

CACFP meal pattern requirements for these respective age groups, CACFP 09-2017 also applies to the School Meal Programs' infant and preschool meal patterns.

Meat/Meat Alternate Requirements

Tofu and Soy Yogurt

To better serve diverse populations, offer greater flexibility to the menu planner, and to be consistent with older grade groups, tofu and soy yogurt products are allowed as meat alternates under the updated preschool meal patterns. The Dietary Guidelines notes that the consumption of a balanced variety of protein foods, including plant-based protein sources (e.g., tofu and soy yogurt) can contribute to improved nutrient intake and health benefits.

For more information on how to credit tofu and soy yogurt products as a meat alternate, please see memorandum SP 53-2016, CACFP 21-2016, *Crediting Tofu and Soy Yogurt Products in the School Meal Programs and the Child and Adult Care Food Program* (<https://www.fns.usda.gov/crediting-tofu-and-soy-yogurt-products-school-meal-programs-and-cacfp>). Tofu and soy yogurt products are not allowed as meat alternates in the infant meal pattern.

Yogurt Sugar Limit

To help reduce infants' and preschoolers' consumption of added sugars, yogurt (including soy yogurt) must contain no more than 23 grams of sugar per 6 ounces under the updated infant and preschool meal patterns. Yogurt provides nutrients that are vital for health, growth, and maintenance of the body, including calcium, potassium, and vitamin D (when fortified). These beneficial nutrients can be "diluted" by the addition of calories from added sugars. In addition, food preferences, including a preference for sweet foods, are established at a young age. Requiring a sugar limit on yogurt reinforces that yogurt can be part of a healthful diet with less sugar.

Yogurts containing no more than 23 grams of sugar per 6 ounces are widely available in the current market place and all yogurts available through USDA Foods contain significantly less than that. FNS provides a simple table in the training worksheet "Choose Yogurts That are Lower in Added Sugars" (<https://www.fns.usda.gov/tn/cacfp-meal-pattern-training-tools>) to help CNP operators identify and purchase yogurts that meet the requirement. The table includes common yogurt serving sizes and the maximum amount of sugar the yogurt may contain per serving. Schools may use the calculation or the chart to determine if a yogurt is within the sugar limit. If a yogurt meets the sugar limit using either the calculation or the chart, it is considered within the sugar limit and may be creditable.

Meat/Meat Alternate at Breakfast

Similar to the meal pattern requirements for older grade groups in the SBP, the updated preschool meal patterns includes a flexibility to serve meat/meat alternates in a

reimbursable breakfast. Starting October 1, 2017, schools may substitute the entire grains component with a meat/meat alternate at preschoolers' breakfasts a maximum of three times per week. This flexibility recognizes the value of a meat/meat alternate at breakfast and provides greater options for menu planners. Please note, this flexibility is slightly different than the one provided for older grade groups.

For more information and examples of this flexibility, please refer to CACFP 08-2017, *Questions and Answers on the Updated Meal Pattern Requirements for the Child and Adult Care Food Program*

(<https://www.fns.usda.gov/cacfp/questions-and-answers-updated-meal-pattern-requirements-child-and-adult-care-food-program>).

III. MEAL SERVICE OPTIONS

Offer Versus Serve and Family Style Meal Service

Introducing children to a variety of healthy foods and new foods at a young age can help shape their eating habits and their attitudes and preference towards foods. Because of this, offer versus serve (OVS) is not considered appropriate for preschoolers. Starting October 1, 2017, schools can no longer use OVS when serving meals to preschoolers.

In place of OVS, FNS encourages schools to serve meals to preschoolers family style, when possible. Family style meal service allows children to serve themselves from common dishes of food with assistance from supervising adults as needed. Schools serving meals family style, across all grade groups, must follow the family style meal service guidance issued by the School Meal Programs.

Under the family style meal service in the School Meal Programs, preschoolers must take at least a 1/4 cup of vegetable or fruit. In addition, while family style meal service allows children to make choices in selecting foods, the supervising adult should initially offer the required minimum serving size of each food component/food item to each student. For more information on family style meal service in the School Meal Programs, please see "Offer Versus Serve Guidance for the National School Lunch Program and the School Breakfast Program, FY 15-16" available at: <https://www.fns.usda.gov/updated-offer-vs-serve-guidance-nslp-and-sbp-beginning-sy2015-16>.

IV. IMPLEMENTATION

As described above, all schools serving meals to infants and preschoolers must comply with the updated meal pattern requirements no later than October 1, 2017. FNS recognizes that when schools are serving preschoolers at the same time as older children (i.e., grades are co-mingled), adhering to two different meal patterns may be operationally challenging. For example, it may be difficult to distinguish preschoolers from slightly older children, resulting in counting and claiming issues. Also, providing the correct foods and portion sizes on the serving line for two different meal patterns may be logistically difficult.

Therefore, FNS is allowing schools that serve meals to preschoolers and K-5 students in the same service area at the same time to either follow the grade-appropriate meal patterns for each age group, or serve the K-5 meal pattern under 7 CFR 210.10 and 220.8 for both grade groups. School food authorities should work with their State agency to find solutions to enable them to serve students their grade-appropriate meal pattern prior to using this single menu flexibility. Please see memorandum SP 37-2017, *Flexibility for Co-Mingled Preschool Meals; Questions and Answers* (<https://fns-prod.azureedge.net/sites/default/files/cn/SP37-2017os.pdf>) for more information.

Although the updated preschool meal patterns are to be implemented by October 1, 2017, FNS understands that schools may need time to fully transition to these requirements. Therefore, FNS granted a transition period that covers schools for the entire SY 2017-2018, which focuses on providing technical assistance without risk of fiscal action or serious deficiencies, and can be used to identify strategies to successfully serve the grade-appropriate meals when preschoolers and K-5 students are co-mingled at meal service. FNS strongly encourages schools and State agencies to provide feedback on successful practices and challenges encountered during the transition period so FNS can evaluate the need for further clarification and guidance. For more information on the transition period, please see memorandum SP 30-2017, *Transition Period for the Updated Child and Adult Care Food Program Meal Patterns and the Updated National School Lunch and School Breakfast Programs' Infant and Preschool Meal Patterns* (<https://www.fns.usda.gov/transition-period-updated-cacfp-infant-preschool-meal-patterns>).

State agencies are reminded to distribute this information to Program operators. Program operators should direct any questions regarding this memorandum to the appropriate State agency. State agency contact information is available at <http://www.fns.usda.gov/cnd/Contacts/StateDirectory.htm>. State agencies should direct questions to the appropriate FNS Regional Office.



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Attachment

**Preschool and Older Grade Group Meal Pattern Requirements:
Comparison Chart**

Meal Pattern Requirement	Preschool Meal Pattern (1 through 4 year olds)	Older Grade Group Meal Patterns
Milk Fat Content	<ul style="list-style-type: none"> • 1 year olds: whole milk • 2-4 year olds: low-fat or fat-free milk 	Must be low-fat or fat-free
Flavored Milk	Not allowed	Allowed ; must be fat-free (exemptions provided for school year 2017-2018)
Non-dairy beverages	Allowed; must be nutritionally equivalent to cow's milk per 210.10(d)(3)	Allowed; must be nutritionally equivalent to cow's milk per 210.10(d)(3)
Vegetables & Fruit Components	<ul style="list-style-type: none"> • Vegetables and fruit are one component at breakfast • Vegetables and fruits are two separate components at lunch and afterschool snack 	<ul style="list-style-type: none"> • Only the fruit component is required at breakfast; vegetables may be offered in place of fruits as long as 2 cups per week of under consumed vegetables (dark green, red/orange, beans and peas, or other vegetables) are included on the weekly breakfast menu • Vegetables and fruits are two separate components at lunch • Vegetables and fruit are one component at afterschool snack
Vegetables & Fruit Juice Limit	Yes; may count towards the entire vegetable and fruit component no more than once per day	Yes; may count towards no more than half of the vegetables or fruits offered over the week
Whole grain-rich requirement	Yes; must serve at least one whole grain-rich grain per day	Yes; all grains offered must be whole grain-rich (exemptions provided for school year 2017-2018)
Grain-based desserts	Not allowed	Allow up to 2 ounce equivalents of grain-based desserts per week at lunch
Breakfast cereal sugar limit	Yes ; must contain no more than 6 grams of sugar per dry ounce (no more than 21.2 grams of sugar per 100 grams of dry cereal)	No sugar limit ; sugar is limited by the weekly calorie limitation set by the dietary specifications

Attachment A

Tofu as a meat/meat alternate	Allowed	Allowed
Yogurt (including soy yogurt) sugar limit as a meat/meat alternate	Yes; must contain no more than 23 grams of sugar per 6 ounces	No sugar limit; sugar is limited by the weekly calorie limit set by the dietary specifications
Meat/meat alternates <u>at breakfast</u>	Allowed; may substitute meat/meat alternate for the entire grain component no more than 3 times per week	Allowed; may substitute 1 ounce equivalent meat/meat alternate for 1 ounce equivalent grains after the minimum daily grains requirement is met
Dietary Specifications	Sugar limits on breakfast cereal and yogurt (see above)	<ul style="list-style-type: none"> • Meals must, on average, meet weekly limits for calories, saturated fat, and sodium • Food products served in meals must contain zero grams of trans fat
Meal service option: Offer Versus Serve	Not allowed	Required for high schools in NSLP; optional for lower grades and in the SBP
Meal service option: Family Style Meal Service	Allowed	Allowed

QUESTIONS AND ANSWERS

1. If a school serves lunch and afterschool snack to preschoolers and the snack contains a grain, does the grain at snack have to be whole grain-rich?

If a school serves lunch and afterschool snack to preschoolers and the snack contains a grain, then either the grain at lunch or the grain at snack must be whole grain-rich. Under the updated preschool meal patterns, only one grain over the course of the day must be whole grain-rich.

Of course, schools are not required to serve a grain at afterschool snack. The school may offer a reimbursable snack with a fruit and vegetable, milk and fruit, a meat alternate and vegetable, and so forth. If the school chooses not to serve a grain item at afterschool snack for preschoolers, then the grain item at lunch must be whole grain-rich.

2. If a school offers half-day preschool, can juice be served at morning and afternoon meals?

Schools that offer half-day preschool where distinct and entirely different groups of children are enrolled for either a morning or afternoon session have a choice. Schools with half-day preschool may choose to handle the half-day sessions as two completely separate programs that are each subject to the all-day preschool meal patterns (e.g., juice is served once per day, at least one grain is whole grain-rich). In this scenario, juice may be served at a morning session meal and an afternoon session meal. Additionally, at least one of the grains must be whole grain-rich in the meals served during the morning session and the afternoon sessions.

Schools with half-day preschool may also choose to apply the all-day preschool meal pattern requirements across both half-day sessions. In this scenario, juice may only be served at a meal during the morning session or the afternoon session, and only one grain across all the meals served in the morning and afternoon sessions, collectively, must be whole grain-rich.

3. If a school serves preschoolers lunch (under the National School Lunch Program (NSLP)) and a snack through the Child and Adult Care Food Program (CACFP), can the school serve juice at both lunch and snack?

Yes. While the intention of the requirement is to limit the service of juice to once per day, FNS understands that it would be logistically challenging to coordinate limiting juice service when a school operates both the School Meal Programs and the CACFP. Therefore, if a school serves preschool lunch (under NSLP) and a CACFP snack, both of those meals may contain juice. The chart below outlines when a school may serve and when they may not serve juice if the school is serving preschool meals and

CACFP meals on the same day. Please note, this is not exhaustive list of all possible options.

Juice Service Scenarios	SBP Preschool (220.8(o)(2))	NSLP Preschool Lunch (210.10(p)(2))	NSLP Preschool Afterschool Snack (210.10(o)(3)(ii))	CACFP (226.20(a)(2) (i),(3)(i))	Is it allowable?
Scenario 1	Juice	No Juice	No Juice	Juice	Allowable
Scenario 2	No Juice	Juice	No Juice	Juice	Allowable
Scenario 3	No Juice	No Juice	Juice	Juice	Allowable
Scenario 4	Juice	Juice	No Juice	Juice	Not allowable
Scenario 5	No Juice	Juice	Juice	No Juice	Not Allowable
Scenario 6	Juice	No Juice	Juice	Juice	Not Allowable

In situations when a school serves preschool lunch and a CACFP snack or meal, FNS encourages the school to serve juice only once per day as a best practice. While juice can be part of a healthful diet, it lacks dietary fiber found in other forms of fruits. When consumed in excess, juice can contribute to extra calories. Additionally, the Dietary Guidelines for Americans recommend that at least half of fruits consumed come from whole fruits.

4. Does the flavored milk flexibility outlined in SP 32-2017, *School Meal Flexibilities for School Year 2017-2018* extend to the preschool meal patterns?

The flavored milk flexibility outlined in SP 32-2017 does not extend to the preschool meal pattern. Starting October 1, 2017, flavored milk cannot be part of a preschool reimbursable meal. Preschoolers must be served either unflavored low-fat (1 percent) or unflavored fat-free (skim) milk.

However, in situations where a school has preschoolers and older children being served in the same service area at the same time (co-mingled) and chooses to serve the K-5 meal pattern to both preschoolers and K-5 students, preschoolers may be served flavored milk as part of a reimbursable meal. Please see memorandum SP 37-2017, *Flexibility for Co-Mingled Preschool Meals; Questions and Answers* (<https://www.fns.usda.gov/school-meals/flexibility-co-mingled-preschool-meals-questions-and-answers>) for more information.

5. Schools that serve meals to preschoolers and K-5 students in the same service area at the time (co-mingled) may choose to follow the grade-appropriate meal patterns or the K-5 meal patterns for both grade groups. What is considered the “same service area”?

In general, “service area” refers to the place where students pick up or choose their meal items. In determining whether the service area qualifies as being the same for co-mingling purposes, schools should consider how difficult it would be to provide each age group the proper foods and portion sizes according to the grade-appropriate meal patterns. Factors such as being able to distinguish preschoolers from older children and switching out line items between groups should be taken into account. If a school determines that their service area cannot be adapted to appropriately serve different meal patterns to different age groups, the co-mingling flexibility may apply. Schools are encouraged to work with their State agency when determining if the co-mingling flexibility applies. For more information about this flexibility, please see memorandum SP 37-2017, *Flexibility for Co-Mingled Preschool Meals; Questions and Answers* (<https://www.fns.usda.gov/school-meals/flexibility-co-mingled-preschool-meals-questions-and-answers>).

As a reminder, FNS has granted a transition period for schools implementing the updated infant and preschool meal patterns. The transition period covers schools for the entire SY 2017-2018, focuses on providing technical assistance without risk of fiscal action or serious deficiencies, and can be used to identify strategies to successfully serve the grade-appropriate meals when preschoolers and K-5 students are co-mingled at meal service. FNS encourages schools to provide feedback on successful practices and challenges encountered during the transition period so FNS can evaluate the need for further clarification and guidance.

6. If a 5 year old student is in preschool, which meal patterns does the school follow for that student?

In situations when a 5 year old is in a preschool, the school must follow the preschool meal pattern requirements. Similarly, if a 4 year old is in kindergarten, the school must follow the K-5 meal pattern. While the age range for the preschool meal patterns is 1 through 4 years old and the age range for the K-5 meal pattern is 5 through 10 years old, schools must always follow the meal pattern that is appropriate for the grade of the student, and not the age.

7. Do preschools have the option to use ounce equivalents for grains prior to October 1, 2019?

Yes. Schools may use ounce equivalents in the preschool meal patterns at any time. This is because an ounce equivalent is slightly heavier (16 grams of grain) than a “serving” (14.75 grams of grains). Therefore, the ounce equivalent meets the

minimum quantity for the grains component. FNS understands that schools are already using ounce equivalents in the meal pattern requirements for older grade groups and that it would be cumbersome to maintain two different grain serving size requirements.

8. Do schools serving infants or preschoolers follow the water requirement for the School Meal Programs or for the CACFP?

Schools serving meals to infants and preschoolers must continue to follow the water requirements in the School Meal Programs as outlined in 7 CFR 210.10(a)(1)(i) and 220.8(a)(1).

For young infants, breastmilk and iron-fortified infant formula are the only beverages needed. When older infants start eating solid foods, the infant's health care provider may recommend introducing small amounts of water.

FNS encourages schools to offer water to preschoolers because very young children may not be able to request water because they lack the ability to communicate their desire for water. For additional guidance on offering water to preschoolers, please refer to CACFP 20-2016, *Water Availability in the Child and Adult Care Food Program* (<https://www.fns.usda.gov/cacfp/water-availability-child-and-adult-care-food-program>).

9. Can reimbursable infant and preschool meals and snacks contain foods that are deep-fat fried on-site?

Under the updated infant and preschool meal patterns, foods that are deep-fat fried on-site cannot contribute towards a reimbursable meal (7 CFR 210.10(o)(3)(i) and (4)(i), 210.10(p)(1), 210.10(q)(1), 220.8(o)(1), and 220.8(p)(1)). Schools serving meals to preschoolers may still purchase and serve foods that are pre-fried, flash-fried, or par-fried by the manufacturer, such as fried fish sticks or potato wedges. But, those foods must be reheated using a method other than deep-fat frying.

Central, satellite kitchens are considered on-site. Therefore, meals served to preschoolers where the meal is prepared at a central, satellite kitchen cannot contain a deep-fat fried food and be claimed for reimbursement.

In contrast, because vended meals are pre-prepared, they are not considered to be prepared on-site. Therefore, schools serving meals to preschoolers may claim a vended meal that contains deep-fat fried foods as long as the deep-fat fried food was prepared by the vendor off-site.

10. May schools that operate the CACFP and serve meals to children 5 years old and older choose to follow the NSLP and SBP meal pattern requirements?

Yes. Schools that serve meals to children 5 years old and older through the CACFP, may choose to follow the NSLP and SBP meal pattern requirements instead of the CACFP meal pattern requirements (7 CFR 226.20(i)). For example, if a school operates the CACFP at-risk afterschool program, they may choose to follow the CACFP or the NSLP meal pattern requirements.

11. Do preschools follow the School Meal Programs' guidance (memorandum SP 59-2016) or the CACFP guidance (memorandum CACFP 14-2017) for accommodating students with disabilities?

All schools, no matter the grade or age of the students they are serving, must follow the guidance on accommodating students with disabilities as outlined in SP 59-2016, *Modifications to Accommodate Disabilities in School Meal Programs* (<https://www.fns.usda.gov/policy-memorandum-modifications-accommodate-disabilities-school-meal-programs>). Program regulations at 7 CFR 210.10(m) and 220.8 (m) require school food authorities to make food and beverage substitutions to meals to accommodate students with disabilities that restrict their diet. When accommodating disabilities, schools should focus on working collaboratively with parents or guardians to provide reasonable modifications to the meal or meal service to accommodate students with disabilities.

12. How will the Administrative Review process work with the updated infant and preschool meal patterns?

School food authorities that provide meals to infants and preschoolers will continue to be monitored using the Administrative Review process. State agency staff must ensure schools operating the School Meal Programs offer and serve meals to students that meet the meal pattern requirements for the appropriate grade groups on all reimbursable meal service lines. Information will be added to the School Year 17-18 Administrative Review manual in the Section: Meal Pattern and Nutritional Quality, including applicable forms and tools for reviewers. The review process will be consistent with past years and the review of other grade groups. Starting October 1, 2017, when schools must comply with the updated infant and preschool meal patterns, State agencies will assess infant and preschool meals in accordance with the updated meal pattern for those grade groups. As a reminder, during the transition period, State agencies must provide technical assistance in lieu of fiscal action when they observe violations related to the updated meal pattern requirements.