

WHOLE GRAINS ON EVERY PLATE CONFERENCE

October 17-19, 2012, San Antonio, Texas

WHOLE GRAIN-RICH IN SCHOOLS New U.S. School Food Rules Bring More Whole Grains to Our Kids

In 2012, nutrition requirements for schools participating in the U.S. National School Lunch Program (NSLP) and School Breakfast Program (SBP) were updated for the first time in 15 years. Previously, whole grains were *encouraged*, but as of July 1, 2012, at least half of the grain foods in school lunches are *required* to be “whole grain-rich” – and in two more years, the requirement will apply to *all* grain foods in both breakfasts and lunches in schools.

In this section we’ll explain how the new school rules affect the whole grains community, and how the WGC can support manufacturers, schools – and kids – through this exciting transition.

What is Whole Grain-Rich? – A look at this key new definition.

FAQ for Whole Grain Products – With help from USDA/FNS, we clarify some of the key questions that have arisen from the new grain requirements.

USDA Memo SP 30-2012 – A copy of the Grain Requirements for the National School Lunch Program and School Breakfast Program. Required reading for anyone providing whole grains to schools!

Challenges for Schools – While we’re all glad to see whole grains required in schools, implementing them has its challenges for school lunch personnel. One issue is a new *maximum* for whole grain servings that means elementary schools couldn’t serve a whole grain sandwich five days a week without exceeding the guidelines. We include a commentary for reflection.

WHAT IS WHOLE GRAIN-RICH?

Under the new U.S. school food rules, foods are considered whole grain-rich if they meet the requirements below.

The Short-and-Sweet version. Whole grain-rich foods are those that

- a. are 100% whole grain (all the grain is whole grain) OR
- b. contain at least half their grain as whole grain, with all remaining grain being enriched.

All the details, from USDA. While the short-and-sweet version gives you the basics, USDA provides a few more details to help identify exactly which foods qualify as whole grain-rich. All foods must satisfy element 1 and one of the three tests in Element 2.

Element 1
Does the serving size qualify?

Different foods have different required serving sizes known as “ounce equivalents.”
See Exhibit A of memo SP 30-2012.

Element 2
Does the food meet any ONE of these 3 tests?

1. The food contains 8g of whole grain per ounce-equivalent for most foods (14g for Groups H and I)
OR
2. The packaging shows the FDA-approved whole grain health claim saying “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.”
OR
3. A whole grain is the first ingredient .
There are some fine details to this one, too, so check out SP 30-2012.

FAQ ON NEW U.S. SCHOOL RULES FOR GRAINS

For the first time ever, U.S. school meal programs now require whole grains, as part of an overall upgrade of school nutrition. Manufacturers and schools have been working hard, since the new rules were made public in late January 2012, and specifics on grains followed in late April. The rules went into effect on July 1, 2012.

Most of the specifics on grains are in memo SP 30-2012 from USDA's Food and Nutrition Service (FNS). This FAQ may help answer some additional questions.

Q. What's the definition of a whole grain-rich food?

A. In essence, it's a food where at least half the grain is whole grain, and any remaining grain is enriched grain. See SP 30-2012 (following) for a more exact definition with more details.

Q. Do all grain foods served in schools need to be "whole grain-rich?"

A. Not yet. Here's the schedule for phasing in whole grain-rich foods:

School year	Whole grain-rich requirement
2012-2013 (starting 7/1/2012)	≥ 50% of grains (lunch)
2013-2014 (starting 7/1/2013)	≥ 50% of grains (lunch + breakfast)
2014-2105 (starting 7/1/2014)	100% of grains (lunch + breakfast)

Q. What's a serving size for grain foods in schools? Is it now one ounce?

A. In general, a serving is one "ounce equivalent." The amount of food that is considered one "ounce equivalent" varies widely, depending on the type of food, from as little as 22 grams (0.8 oz) to as much as 125 grams (4.4 oz). See Exhibit A of SP 30-2012 later in this section for specifics.

Q. Why do serving sizes vary so much?

A. The goal is to make sure each serving contains at least 16 grams of grain. Crackers – dry and mostly made of grain – can easily contain 16g of grain in a 22g serving. A brownie contains oil, eggs, chocolate, sugar and many other ingredients – so it takes 125g (4.4 oz) of brownie to contain 16g of grain.

Foods that are largely single-ingredient such as oatmeal, bulgur, barley, quinoa, rice, and pasta have a serving size of one ounce (28g dry) or ½ cup cooked.

Note: Previous serving sizes were based on the amount of food that would contain 14.75g of grain. Old serving sizes can also be used until June 30, 2013.

Q. If the goal is "whatever amount contains 16g of grain" why do some foods require 28g of whole grain content to be a serving, or ounce equivalent?

A. Plain grains – rice and other grains, pasta, oatmeal, etc. – the foods in Group H – have a serving size of 28g dry which means they generally need to contain 28g of grain content to quality as an ounce equivalent. USDA tells us this is because 16g would not provide enough food for hungry kids.

Q. Is there a limit to how many whole grains schools can serve?

A. Yes, there are both maximums and minimums for the number of grain servings (ounce equivalents) on a weekly basis, and a daily minimum.

Breakfast (SBP)	Minimum/wk	Maximum/wk	Minimum/day
Grades K-5	7 oz eq	10 oz eq	1 oz eq
Grades 6-8	8 oz eq	10 oz eq	1 oz eq
Grades 9-12	9 oz eq	10 oz eq	1 oz eq

Lunch (NSLP)	Minimum/wk	Maximum/wk	
Grades K-5	8 oz eq	9 oz eq	1 oz eq
Grades 6-8	8 oz eq	10 oz eq	1 oz eq
Grades 9-12	10 oz eq	12 oz eq	2 oz eq

Q. Do only full “ounce equivalents” count?

A. Amounts of grain equal to ¼, ½, or ¾ of an ounce equivalent can also count. So a second grader could potentially eat the following in a week of lunches:

Monday	1 hamburger bun	35g	1.25 oz eq
	Green salad w croutons	6g	0.25 oz eq
Tuesday	bulgur salad	28g	1.00 oz eq
	2 crackers	11g	0.50 oz eq
Wednesday	1 slice pizza	56g	2.00 oz eq
Thursday	chili, wg cornbread	34g	1.00 oz eq
	granola bar w raisins	69g	1.00 oz eq
Friday	wg mac and cheese	1 cup	2.00 oz eq
	TOTAL		9 oz eq

Q. Do battered or breaded fish and meat count toward maximums?

A. Not this year. But breading and batter will be counted toward maximums as of July 1, 2013 (start of the 2013-2014 school year), which may cut down on their use.

Q. How many whole grain desserts can schools serve?

A. Up to two servings (ounce equivalents) of desserts can be served at lunch each week. These grains also count toward maximums.

Q. Will a bran cereal qualify for school meals?

A. Bran and germ are not creditable grains. Since foods generally must contain at least half their grain as whole grain, and all remaining grain must be enriched refined grain, bran and germ will disqualify *most* foods. However, FNS says, “Bran cereals should be ok to meet requirements. SP 30 states that RTE [ready to eat] cereals are considered whole grain-rich if the first grain ingredient is a whole grain and the cereal is fortified. If the cereal is 100% whole grain, fortification is not required.”

Q. What if my product contains a little cornstarch as a release agent?

A. Non-creditable grains (such as cornstarch) used as processing aids are allowable, as long as they make up less than 2% of the grain in the product.

Q. Can grain blends count as a whole grain-rich side dish?

A. Yes. For example, you could mix a quarter cup of cooked brown rice and a quarter cup of enriched white rice and the result would count as an ounce equivalent of whole grain-rich rice.

Q. How many grams of whole grain qualify a food as whole grain-rich?

A. For most foods (Groups A-G of Exhibit A of SP 30-2012) 16g of total grain content is a creditable grain serving, so 8 grams of whole grain per ounce equivalent will qualify a food as whole grain-rich. For foods in Groups H (grains, hot cereals, pastas) and I (cold cereals), the amount is 28g (dry product) of creditable grain ingredients to provide a 1-ounce equivalent credit; therefore 14g of whole grain must be present to qualify a food as whole grain-rich. The general idea is to offer at least an ounce of actual food in a serving in all groups. Since the foods in Group H and Group I consist almost entirely of grain ingredients, the grain amount is higher.

Q. Can whole grain-rich foods have the moderate fat health claim on them?

A. Yes, although only the low-fat version of the claim is mentioned in Memo SP 30-2012, USDA has assured the WGC in writing that foods bearing the FDA approved whole grain health claim for moderate fat may qualify for school meal programs. USDA adds, "Some grains may contain more fat than others; the school program operator should consider these factors when deciding how often to serve them."

Q. On mixed dishes, can whole grains in the aggregate be the first grain ingredient even if it's not something made in-house?

A. Yes. On all foods, you may aggregate grains to determine the total whole grain content. For example, if the grain in a pizza crust consists of enriched wheat flour (40% of grain), whole wheat (30%), and whole oats (30%), this crust would be considered as having 60% of its grain as whole grain and 40% of its gain as enriched grain, thereby meeting the qualification as whole grain-rich.

Q. Does CN Labeling help identify whole grain-rich foods?

A. Yes and no. There is no CN labeling specifically for grain foods. However, if a food contains meat or meat-equivalents it can qualify for CN labeling and the label can also designate whether the product meets requirements for a grain or for being whole grain-rich.

Q. If a food qualifies as Whole Grain-Rich, can I label it as such?

A. FDA does not at this time support labeling of foods with the words Whole Grain-Rich, so products should not use these words on retail packaging. We cannot think of any reason why you couldn't use such wording on collateral materials promoting your products directly to schools.



United States
Department of
Agriculture
Food and
Nutrition
Service

3101 Park
Center Drive

DATE: April 26, 2012

MEMO CODE: SP 30-2012

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

TO: Regional Directors Special Nutrition Programs All Regions
State Directors Child Nutrition Programs All States

SOURCE CITATION:

42 USC 1753(b)(3) and 1758(a)(4) and 7 CFR Parts 210 and 220

This memorandum explains the grains requirements for the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) and specifically addresses implementation of the ounce equivalencies and definition of whole grain-rich products.

The Department of Agriculture (USDA) published, "Nutrition Standards in the National School Lunch and School Breakfast Programs" on January 26, 2012. This final rule amended NSLP and SBP regulations at 7 CFR 210.10 and 220.8, updating the meal patterns and nutrition standards to align them with the 2010 *Dietary Guidelines for Americans* (DGAs) as required by Sections 4(b) and 9(a)(4) of the Richard B. Russell National School Lunch Act as amended by Section 201 of the Healthy, Hunger-Free Kids Act of 2010. 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 foods 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. NSLP and SBP nutrition standards also require all grains to be whole grain-rich by school year (SY) 2014-2015.

This memorandum sets forth the criteria to be used by school food authorities (SFAs) and program operators to determine grains which meet the regulatory standards and to determine equivalent minimum serving sizes (oz eq). In addition, this memorandum includes examples of foods that qualify as grains based on the nutrition standards in the NSLP and SBP hereafter referred to as "school meal programs."

AN EQUAL OPPORTUNITY EMPLOYER

I CRITERIA FOR DETERMINING ACCEPTABLE GRAINS FOR SCHOOL MEAL PROGRAMS

The requirements to offer whole grain-rich products will be phased in for the school meal programs over the next two SYs:

For **lunch**, beginning July 1, 2012 (SY 2012-2013), through June 30, 2014 (SY 2013-2014), half of the grains offered during the school week must meet the whole grain-rich criteria. Beginning July 1, 2014, (SY 2014-2015), all grains must meet the whole grain-rich criteria.

For **breakfast**, beginning July 1, 2013 (SY 2013-2014), half of the grains offered during the school week must meet the whole grain-rich criteria. Beginning July 1, 2014, (SY 2014-2015), all grains must meet the whole grain-rich criteria.

Through SY 2013-2014, SFAs and program operators should continue to refer to *Section 3 Grains/Breads* of the *Food Buying Guide for Child Nutrition Programs* and *FCS Instruction 783 - REV 2, The Grains/Breads Requirements for Food-based Menu Planning Alternatives in the Child Nutrition Programs* for guidance on products which meet the grains requirements, but not the whole grain-rich requirements. After SY 2013-2014, all grain must be whole grain-rich in order to meet NSLP and SBP nutrition standards. The USDA is in the process of updating several resources to assist SFAs and program operators with identifying whole grain-rich foods for availability by summer 2012.

Whole Grain-Rich Criteria

In accordance with NSLP and SBP regulations at 7 CFR Parts 210 and 220, the following criteria are to be used as the basis for crediting items to meet the whole grain-rich requirement:

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 attached Exhibit A weights must be at least 8.0 grams or more for Groups A – G. For Groups H and I, the volumes or weights listed must be offered to credit as one oz eq. This information may be determined from information provided 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,

or the product itself is enriched; the ingredients or the grain product must meet the Food and Drug Administration's standards of identity for enrichment (21 CFR Section 137). Bran and germ are not 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.

Manufacturers may apply for a Child Nutrition (CN) Label for qualifying products to indicate the number of oz eq grains that meet the whole grain-rich criteria. The term, "oz eq grains" on the CN Label indicates the product meets the whole grain-rich criteria, while the terms "bread" or "bread alternate" on the CN Label indicates the product meets previous program requirements for grains/breads. Please refer to the CN Labeling Program website for details regarding qualifying products at: www.fns.usda.gov/cnd/cnlabeling/.

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, will become effective on July 1, 2012, the beginning of SY 2012-2013. Recognizing that operators and manufacturers which provide products for the school meal programs may require time to change specifications and revise products, we will allow SFAs and program operators to credit grain products based on the current 14.75 grams of grains per serving through SY 2012-2013. All grain products must be credited based on per oz eq standards beginning on July 1, 2013, the beginning of SY 2013-2014.

As provided for in NSLP and SBP regulations, 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 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 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 dessert.

During SY 2012-2013, battered and/or breaded products offered will not need to be counted toward the maximum weekly grain requirements in the meal pattern. Beginning July 1, 2013 (SY 2013-2014), all grains which are part of battered and/or breaded products offered must be counted towards the weekly grain requirement.

The contribution of grains in a recipe or product formulation for items listed in Exhibit A, Groups A-G, may be calculated to determine the number of oz eq grains the recipe provides based on 16 grams of grain ingredients per ounce equivalent. The crediting of a food item as oz eq grains is determined by the total amount in grams of whole-grain meal and/or flour or whole-grain and enriched meal and/or flour in the product formulation or recipe divided by the number of servings the formulation or recipe yields divided by the 16 grams per oz eq standard. For the types of food items listed in Groups H and I of the attached Exhibit A to count as one full serving, the weights or volumes listed therein must be used.

One quarter (1/4) of an oz eq is the smallest amount allowable to be credited toward the quantities of grains. If the minimum daily requirement for grains is 1 oz eq, this minimum can be met by offering multiple food items, for example, 0.5 oz eq of one grain item and 0.5 oz eq of another grain item. The oz eq for grains may be determined by using either the weights or volumes listed in the attached Exhibit A, or the SFA may require documentation from a manufacturer certifying the grams of creditable grains per portion for determining the oz eq from a given product.

The attached *Exhibit A: School Lunch and Breakfast* contains the equivalent minimum weights for a wide variety of purchased food items to meet the oz eq criteria. Program operators may use Exhibit A instead of calculating the actual amount of grains in a product since it provides the equivalent minimum weights to provide one oz eq of grains. We note that the listing of food items included in Exhibit A is not exhaustive.

Exhibit A provides oz equivalent information for products commonly offered in schools. SFAs have flexibility to use a wide range of products in planning meals which meet NSLP and SBP meal pattern and nutrition specifications. However, 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.

SUMMARY OF IMPLEMENTATION DATES:

Ounce equivalent requirements: All grain products must be credited based on oz eq standards beginning July 1, 2013, the beginning of SY-2013-2014. The grain component weights in the attached *Exhibit A: School Lunch and Breakfast* have been

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updated to reflect the change from 14.75 grams of creditable grain to 16.0 grams of creditable grain per oz eq for Groups A-G. The original Exhibit A weights and volumes for all Child Nutrition Programs may continue to be used through June 30, 2013 for lunch and breakfast.

Whole grain-rich requirements: for lunch, beginning July 1, 2012 (SY 2012-2013), half of the grains offered during the school week must meet the whole grain-rich criteria. For breakfast, beginning July 1, 2013 (SY 2013-2014), half of the grains offered during the school week must meet the whole grain-rich criteria. Beginning July 1, 2014, (SY 2014- 2015), all grains must meet the whole grain-rich criteria for lunch and breakfast.

For NSLP and SBP (sections 210.10, 210.10a, 220.8, and 220.8a), this policy memorandum supersedes FCS Instruction 783 - REV 2, The Grains/Breads Requirements for Food-based Menu Planning Alternatives in the Child Nutrition Programs and the *Food Buying Guide for Child Nutrition Programs* guidance on Grains/Breads. However, the FCS Instruction 783 - REV 2, will be revised to remove the sections mentioned above and will pertain to all other Child Nutrition Programs. State Agencies should contact their Food and Nutrition Service Regional Office with any questions.

Cynthia Long
Director
Child Nutrition Division

Attachment

**EXHIBIT A: SCHOOL LUNCH AND BREAKFAST
WHOLE GRAIN-RICH OUNCE EQUIVALENCY (OZ EQ)
REQUIREMENTS FOR SCHOOL MEAL PROGRAMS^{1,2}**

GROUP A	OZ EQ FOR GROUP A
<ul style="list-style-type: none"> • Bread type coating • Bread sticks (hard) • Chow mein noodles • Savory crackers (saltines and snack crackers) • Croutons • Pretzels (hard) <p>^a Stuffing (dry) Note: weights apply to bread in stuffing.</p>	<p>1 oz eq = 22 gm or 0.8 oz</p> <p>$\frac{3}{4}$ oz eq = 17 gm or 0.6 oz</p> <p>$\frac{1}{2}$ oz eq = 11 gm or 0.4 oz</p> <p>$\frac{1}{4}$ oz eq = 6 gm or 0.2 oz</p>
GROUP B	OZ EQ FOR GROUP B
<ul style="list-style-type: none"> • Bagels • Batter type coating • Biscuits • Breads (sliced whole wheat, French, Italian) • Buns (hamburger and hot dog) • Sweet crackers (graham crackers, all shapes; animal crackers) • Egg roll skins • English muffins • Pita bread (whole wheat or whole grain-rich) • Pizza crust • Pretzels (soft) • Rolls (whole wheat or whole grain-rich) • Tortillas (whole wheat or whole corn) • Tortilla chips (whole wheat or whole corn) • Taco shells (whole wheat or whole corn) 	<p>1 oz eq = 28 gm or 1.0 oz</p> <p>$\frac{3}{4}$ oz eq = 21 gm or 0.75 oz</p> <p>$\frac{1}{2}$ oz eq = 14 gm or 0.5 oz</p> <p>$\frac{1}{4}$ oz eq = 7 gm or 0.25 oz</p>
GROUP C	OZ EQ FOR GROUP C
<ul style="list-style-type: none"> • Cookies³ (plain – includes vanilla wafers) • Cornbread • Corn muffins • Croissants • Pancakes • Pie crust (dessert pies³, cobbler³, fruit turnovers⁴, and meat/meat alternative pies) • Waffles 	<p>1 oz eq = 34 gm or 1.2 oz</p> <p>$\frac{3}{4}$ oz eq = 26 gm or 0.9 oz</p> <p>$\frac{1}{2}$ oz eq = 17 gm or 0.6 oz</p> <p>$\frac{1}{4}$ oz eq = 9 gm or 0.3 oz</p>

¹ The following food quantities from Groups A-G, must contain at least 16 grams of whole-grain or can be made with 8 grams of whole-grain and 8 grams of enriched meal and/or enriched flour to be considered whole grain-rich.

² Some of the following grains may contain more sugar, salt, and/or fat than others. This should be a consideration when deciding how often to serve them.

³ Allowed only as dessert at lunch as specified in §210.10.

⁴ Allowed for desserts at lunch as specified in §210.10, and for breakfasts served under the SBP.

GROUP D	OZ EQ FOR GROUP D
<ul style="list-style-type: none"> • Doughnuts⁴ (cake and yeast-raised, unfrosted) • Cereal bars, breakfast bars, granola bars⁴ (plain) • Muffins (all, except corn) • Sweet roll⁴ (unfrosted) • Toaster pastry⁴ (unfrosted) 	1 oz eq = 55 gm or 2.0 oz ¾ oz eq = 42 gm or 1.5 oz ½ oz eq = 28 gm or 1.0 oz ¼ oz eq = 14 gm or 0.5 oz
GROUP E	OZ EQ FOR GROUP E
<ul style="list-style-type: none"> • Cereal bars, breakfast bars, granola bars⁴ (with nuts, dried fruit, and/or chocolate pieces) • Cookies³ (with nuts, raisins, chocolate pieces and/or fruit purees) • Doughnuts⁴ (cake and yeast-raised, frosted or glazed) • French toast • Sweet rolls⁴ (frosted) • Toaster pastry⁴ (frosted) 	1 oz eq = 69 gm or 2.4 oz ¾ oz eq = 52 gm or 1.8 oz ½ oz eq = 35 gm or 1.2 oz ¼ oz eq = 18 gm or 0.6 oz
GROUP F	OZ EQ FOR GROUP F
<ul style="list-style-type: none"> • Cake³ (plain, unfrosted) • Coffee cake 	1 oz eq = 82 gm or 2.9 oz ¾ oz eq = 62 gm or 2.2 oz ½ oz eq = 41 gm or 1.5 oz ¼ oz eq = 21 gm or 0.7 oz
GROUP G	OZ EQ FOR GROUP G
<ul style="list-style-type: none"> • Brownies³ (plain) • Cake³ (all varieties, frosted) 	1 oz eq = 125 gm or 4.4 oz ¾ oz eq = 94 gm or 3.3 oz ½ oz eq = 63 gm or 2.2 oz ¼ oz eq = 32 gm or 1.1 oz
GROUP H	OZ EQ FOR GROUP H
<ul style="list-style-type: none"> • Cereal grains (barley, quinoa, etc.) • Breakfast cereals (cooked)^{5,6} • Bulgur or cracked wheat • Macaroni (all shapes) • Noodles (all shapes) • Pasta (all shapes) • Ravioli (noodle only) • Rice (enriched white or brown) 	1 oz eq = ½ cup cooked or 1 ounce (28g) dry
GROUP I	OZ EQ FOR GROUP I
<ul style="list-style-type: none"> • Ready to eat breakfast cereal (cold, dry)^{5,6} 	1 oz eq = 1 cup or 1 ounce, flakes or rounds 1 oz eq = 1.25 cups or 1 ounce, puffed cereal 1 oz eq = ¼ cup or 1 ounce, granola

⁵ Refer to program regulations for the appropriate serving size for supplements served to children aged 1 through 5 in the NSLP; and meals served to children ages 1 through 5 and adult participants in the CACFP. Breakfast cereals are traditionally served as a breakfast menu item but may be served in meals other than breakfast.

⁶ Cereals must be whole-grain, or whole grain and enriched or fortified cereal.

Overall, Oldways and the Whole Grains Council heartily support the efforts USDA / FNS is making to improve the quality of school meals while reducing child obesity. It's an enormous task, and all new systems inevitably have a few kinks that need to be worked out over time. We are sharing this blog – which overall supports the increase of fruits, vegetables and whole grains in the new rules – because we think it points out some important common-sense issues that FNS may want to address going forward.

NEW USDA SCHOOL LUNCH RULES LIMIT EVEN HEALTHY CHOICES

by Dana Woldow, at <http://www.beyondchron.org> on Aug. 07, 2012

All news from London this week seems to have an Olympics connection, but London makes me think of food. Specifically, I think of two chains of soup-salad-and-sandwich takeaway shops which set a high bar for providing quick, healthy and reasonably priced meals. Frequent meals from these shops on a recent London visit got me thinking - could this be a new model for school lunch?

The two chains are [Pret A Manger](#) and [EAT](#). Their shops, which are plentiful in London, carry a large variety of choices for breakfast, lunch and quick light dinners. The food at both chains is addictively fresh and delicious. A school lunch menu wouldn't have to offer the same large variety; the key is the freshness of the ingredients. Still, the soup-salad-sandwich model could provide a much greater degree of choice than students currently have, especially at elementary schools.

The USDA nutritional requirements for school meals [have changed](#) as of July 1, requiring additional and more varied vegetables, more fruit, and more whole grains. But nothing in the voluminous requirements of the [Healthy Hunger Free Kids Act](#) mandates that school lunch must always be hot.

Here's my vision for a new style school lunch menu. The cafeteria would offer a daily choice of two or three sandwiches, cut in half with each half packaged separately. A daily soup, and choice of two or three salads, each in a half portion, would also be offered, along with fruit and milk.

Each entree choice - every half sandwich, small cup of soup or salad - would fulfill half of the nutritional requirements for meat (or meat alternative), grain, and vegetable. Students must choose two entree portions, along with their fruit and milk, and since each entree portion fulfills half the requirements, their choice of two means that all requirements are covered.

But the choice is entirely up to the student! One student might choose half a sandwich and a serving of soup, while another chooses two different salad portions, and yet another selects two sandwich halves. Even with a minimum offering of two sandwich varieties, two salads and one soup, elementary school students would have 15 different possible choices for their lunch; in my school district, elementary school students currently have only one choice (although a vegetarian option can be preordered.)

For [over 100 years](#), school lunch programs have focused on providing a hot meal. But is that really necessary? So many of the complaints about school lunch - the "what-the-heck-is-it" mystery meat, the mushy texture of the cooked veggies, the too-frequent use of

sodium, artificial ingredients, and preservatives - are all problems which could vanish with the introduction of a made-fresh-daily lunch menu based entirely on the sandwiches / soups / salads model of the successful British chains.

I've [criticized people](#) who suggest that to fix school food, schools should "just" do this or that one thing, which they claim would be easy and inexpensive, because those EZ fixes rarely turn out to be feasible. To determine if my new style school lunch idea was a "just do this easy thing" non-starter, I spoke with Sophie Johnson, menu planner for [Choicelunch](#), a healthy school lunch provider based in Northern California. I explained my idea and asked her if she thought such a plan would be workable under the new USDA lunch regulations.

She responded: "Yes, I think with very careful planning it could be done. The fruit and milk are simple and check the boxes. The salads, soups and sandwiches are trickier, but doable. Each one of the half portions would have to be EXACTLY 1 serving of grain and 1 serving of protein, with the rest being veggies (or fruit), and all of the sub veggies would have to be met."

However, she explained that the regulations set both minimum and maximum amounts for grains and meat (or meat alternative, such as beans or tofu, which as of July is for the first time allowed to be counted as a protein in school meals.) For grains, the weekly maximum for elementary students is 9 one-ounce servings. This means that my idea would only work for elementary school students if it were limited to 4 days per week; with each entree portion containing an ounce of grain, taking 2 entree portions per day over 5 days would mean students would be choosing 10 grain servings over the course of the week, exceeding the maximum allowed.

This maximum amount of grains and meat which could be offered over the course of the week will likely be news to most people. After the Healthy Hunger Free Kids Act was finalized, the media swarmed all over the famous "[pizza as a vegetable](#)" and unlimited potatoes provisions. Also mentioned were the requirements for more fruits and vegetables, phasing in whole grains, limiting fat content in milk, and setting a first-time-ever maximum on calories.

What the general public is unaware of, but school nutrition directors are [coming to realize](#), is that the limits on grains and meat may result in meals which look a bit, well, skimpy to students used to larger servings.

Choicelunch's Johnson, who follows USDA regulations closely, says that it wasn't until she read the [guidance memo](#) from the USDA dated April 27, 2012, that she became aware of just how tight those limits are. She explains that for K-5 students, total portions per week must come in at no less than 8 oz and no more than 9 oz for grain, and at no less than 8 oz and no more than 10 oz for meat/alternative. Consider that the smallest size commercially produced hamburger patty is 3 oz – that's almost $\frac{1}{3}$ of a child's maximum allowable weekly meat right there.

As Johnson says, "My 4 year old son eats more in one day than what an entire week's worth of lunches are supposed to contain for grains and meats!" and she concludes "Kids may be seeing more volume in the food because of more fruits and veggies, so I don't think they are going to think they are being starved, but ... I think the servings for meat and grains will really be seen as petite."

I think what Johnson means is that for elementary students whose favorite lunch is a slice of pizza or a cheeseburger, the sizes of those items may shrink, while the size of the portions of fruits and vegetables served alongside will expand. Students used to skipping the fruit and vegetables (which was allowed in school meal programs operating under a policy, mandatory for high school but optional for younger students, called “offer vs. serve”) will now be required to take at least a ½ cup serving of one or the other. Those who toss the fruit or veg in the trash and eat only the grain and protein may find themselves still hungry at the end of the meal.

Elementary students who love fruits and veggies will have no trouble filling up at lunch time, because cafeterias [will be required](#) to offer them at least 3.75 cups of vegetables per week, or ¾ cup per day. Bad news for those who only love french fries or corn, though - those “starchy” vegetables can comprise only one of those 3.75 cups. The rest have to be dark green (think spinach, romaine, and kale), red/orange (carrots, winter squash), legumes (dried beans and peas), and “other” (tomatoes, green beans, cucumber, etc.), and each of those groups must be served every week. Elementary students will also get at least ½ cup of fruit with lunch.

If the goal was to make sure kids aren’t putting just pizza, cheeseburgers, or hot dogs and french fries on their tray each day, the new rules make sense. Between the tight limits on grains and meat, the enforced variety in vegetables, and the requirement to take at least a minimum serving of fruit or veg each day, we may have seen the last of the daily pizza-and-french-fries school lunch.

However, if the goal was to help students learn how to make healthy choices, and to have some say over what they put on their lunch tray, then the new rules leave something to be desired.

I assumed my model for school lunch choice would include sandwiches garnished with dark leafy greens to meet the vegetable requirement; remember that each sandwich half was supposed to meet half the requirement for grain, meat/alternative, and veg. But according to the [USDA guidance](#), “a ½ cup of Romaine Lettuce contributes [only] ¼ cup toward the ‘dark green’ vegetable subgroup.” In other words, although the required minimum for all other vegetables is ½ cup, the minimum for raw leafy greens is actually a full cup.

To ensure that a student who chose two sandwich halves for their lunch got the required minimum serving of dark leafy greens, each half sandwich would have to contain ½ cup of romaine, literally dwarfing the one ounce of sliced turkey (one or two thin slices) which is the maximum portion of meat allowed in an entree aiming to satisfy half of the meat/alternative requirement.

Then there were those weekly legumes. I planned to meet that requirement by offering hummus in a pita half, garnished with tomato and cucumber, but it turns out that if you count the hummus as a vegetable, then you can’t also count it as a meat alternative in the same meal. A hummus / cucumber / pita half could meet the requirement for meat/alternative, veg, and grain if it contained sufficient cucumber (“other” vegetable) and counted the hummus as a “meat alternative,” but then the hummus couldn’t count as the required weekly legume.

Trying to make this work makes my head spin, and inspires renewed respect for people I already held in high regard: the student nutrition staff who do make these regulations work. It shouldn't have to be this hard. The old system was easier - a serving of grain, at least 2 oz of protein, a fruit, a veg, milk. But that system was abused, with some schools serving nothing but potatoes or corn for the veg, and lots of fatty meat, and pizza every day. Now we have everything spelled out in detail to make sure the kids get a variety of veggies and limited amounts of pizza and burgers, but it has limited student choice too, and not just bad choices.

Justin Gagnon is the CEO of Choicelunch, and as the name implies, his company is based on providing students and their families with a lot of different healthy choices for their school lunch. He sums up the new USDA rules thus:

“These regulations simply do not support programs that offer choices. Menu planning when you’re using fresh, real ingredients is hard enough. They’re throwing out SO MANY REGS right now, that it is nearly impossible to actually execute on a solid menu with real choices and still nail every single one of their requirements.

When you spend so much time and energy trying to guarantee that bad practices are prohibited, you end up blocking out some really good practices that go against the status quo, but aren't yet on your radar. It's not innovation if you're not breaking rules, and these regs stifle innovation in an industry that desperately needs it.”

Dana Woldow has been a school food advocate since 2002 and shares what she has learned at PEACHSF.org. Follow her on Twitter [@nestwife](https://twitter.com/nestwife).

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