

5 — Meal Service

SFAs must comply with the USDA’s regulations and policies regarding meal service and Connecticut’s statute regarding lunch periods. This section addresses the meal service requirements for the NSLP and SBP, including lunch and breakfast periods, meal schedules, prohibition of gender separation, water availability, meal identification signage, multiple serving lines, pre-plated meals, vending machines, field trip lunches, and family-style meal service.

Lunch Periods

Lunch periods in Connecticut schools are governed by state and federal regulations. The CSDE’s [Circular Letter C-9: Federal and State Requirements for Provision and Timeframe of Daily Lunch Period for Students](#), summarizes the federal and state requirements.

Connecticut General Statutes (C.G.S.) [Section 10-221o](#) mandates that each local and regional board of education requires each school under its jurisdiction to offer all full-day students a daily lunch period of not less than 20 minutes. To ensure that all students have a lunch period, the CSDE recommends that schools implement the following procedures prior to the start of student course selections.

- Use computer software to identify student schedules that do not include a lunch period. When the guidance counselor reviews course schedules to ensure that students get requested courses, they also identify those student schedules that do not include a lunch period.
- When students select courses that will result in a schedule without a lunch period, the guidance counselor discusses the schedule with the student. The guidance counselor works with the student to revise the schedule to include a lunch period or allows the student to opt out of lunch if the student does not want to drop any courses.
- In the case of a student who wants to opt out of lunch, the CSDE recommends that the school guidance department develops a written waiver that is signed by the student and a parent/guardian to ensure that everyone understands and agrees with the



schedule. This eliminates issues with students unknowingly having a schedule that does not include lunch.

The USDA's regulations ([7 CFR 2010.10 \(l\)](#)) specify that schools and institutions participating in the NSLP must serve lunches during the period of 10:00 a.m. to 2:00 p.m. **SFAs must submit a written request to the CSDE for a waiver if lunches will be served before or after this time frame.** The district must submit the exemption request for the upcoming school year by July 1 of each school year.

The CSDE evaluates the circumstances of each request to determine whether it meets one of the USDA's criteria for an exemption from the specified time frame for lunch. These criteria are based on USDA's memo, *Granting Exemptions to the Lunch Period*, and are summarized below.

1. The CSDE may grant reasonable variances from the meal service requirements to accommodate special circumstances encountered in schools operating for traditional students at traditional times. For example, if a school has a legitimate need to extend the lunch service to 2:30 p.m. due to capacity concerns or because of extended school hours, an exception would be considered a special circumstance.
2. The CSDE may grant exemptions from the meal service requirements if the school operates for traditional students but at a nontraditional time. For example, a school may need to provide lunch service from 3:00 to 4:00 p.m. to accommodate a work-study program that allows high school students to work in the morning and attend high school classes in the later afternoon or evening. Approval of an exemption for this specific circumstance will only be granted if these alternative programs provide students of high school grade or lower an opportunity to obtain the minimum requirements for graduation at a nontraditional time, and it is not possible to serve lunch at a more traditional time.

The written request for a waiver must be submitted to the CSDE by the superintendent and must include the special circumstances at the school that necessitate a change in the time frame for lunch. The CSDE will grant exemptions only if the school's schedule meets one of the two USDA criteria specified above. The CSDE will not grant exemptions for routine scheduling choices such as block schedules.

For more information, see the CSDE's [Circular Letter C-9: Federal and State Requirements for Provision and Timeframe of Daily Lunch Period for Students](#) and [Operational Memorandum No. 10-19: Requirements for Lunch Periods in the National School Lunch Program \(NSLP\)](#).

Breakfast Periods

The USDA's regulations for the SBP (7 CFR 220.2) do not state a specific time period for breakfast, but require that breakfast shall be served at or close to the beginning of the child's day at school. The CSDE recommends that scheduled mealtimes provide students with at least 10 minutes to eat after sitting down for breakfast. This time does not include the time needed to walk to the cafeteria from the classroom, select and pay for the meal, sit down at a table, and walk back to the classroom after the meal.

Meal Schedules

SFAs should schedule meal services to ensure good nutrition practices and minimize food waste. Generally, most children need to eat within 3 to 4 hours of their last meal.

- When the time span between breakfast and lunch is too short, children will not be hungry for lunch. An example is breakfast ending at 9:30 a.m. and lunch starting at 10:00 a.m., for the same group of children.
- When the time span between breakfast and lunch is too long, children can experience hunger symptoms (such as fatigue, irritability, inability to concentrate, weakness, and stomach pains) that can interfere with learning. An example is breakfast ending at 8:00 a.m. and lunch starting at 1:00 p.m., for the same group of children.

SFAs should work with their school administrators to consider the appropriateness of timing and scheduling of all meals (and ASP snacks, if offered).

Prohibition of Gender Separation

In general, the USDA's nondiscrimination laws and policies in 7 CFR Parts 15, 15a, and 15b do not permit SFAs participating in the USDA's school nutrition programs to separate children on any protected basis during meal service. Federal law prohibits discrimination based on gender at any educational institution receiving federal assistance. The USDA allows only two exceptions to the prohibition of gender-separated meal service, as described below.

1. **Coeducational schools and school-based sites:** The USDA recognizes religious exemptions granted by the federal Department of Education (ED) without prior express approval. ED guidelines allow school and school-based sites to apply for an exemption when federal law prohibiting gender separation is inconsistent with the institution's religious tenets. These exemptions apply broadly to operations, including the meal service at a given site, such as a faith-based school. Additionally, ED guidelines specifically allow for the approval of gender-separate instruction at public primary and secondary non-vocational schools that could take a variety of forms.

Since the general rule is that gender separation during meal service is prohibited, a coeducational school may not use limited ED approval of gender-separate instruction to justify blanket gender separation during meal service. Limited exemptions in these situations must be approved by the USDA.

2. **Other institutions and organizations:** State agencies may approve exemptions allowing separation by gender during meal service without express prior approval from the USDA in the following circumstances:
 - meal service at religious institutions operating under the dictates of the religion with which they are affiliated;
 - meal service at juvenile correctional facilities where combining members of the opposite gender would present a potential safety risk; and
 - meal service at facilities that fully separate by gender as part of their normal operations, e.g., gender-separated summer camps.

The local educational agency (LEA) must submit the request in writing to the CSDE. LEAs must specify which reason applies and why separation by gender is necessary. For more information on the exemption process, see [CSDE Operational Memorandum No. 30-15: *Guidance on Prohibition of Separation by Gender during Child Nutrition Program Meal Service.*](#)

The exceptions described above are the only acceptable bases for gender separation during meal service in the USDA's school nutrition programs. Any gender separation not based on the ED or USDA approval processes is strictly prohibited.

Situations that do not clearly fit into any of the exemptions outlined above may be considered on a case-by-case basis by the CSDE in direct consultation with the USDA Food and Nutrition Services (FNS) Regional Office, including the FNS Civil Rights Office and appropriate FNS National Office Child Nutrition Program staff.

Water Availability

The [Healthy, Hunger-Free Kids Act of 2010](#) (Public Law 111-296) requires that schools participating in the NSLP (including the ASP) and SBP must make plain potable water available to children at no cost during the meal service. The water must be available without restriction in the location where meals are served. Water must also be made available for meals and ASP snacks that are served outside of the cafeteria, such as meals served in a classroom or during in-school suspension. SFAs can implement this requirement in a variety of ways, which include:

- offering water pitchers and cups on tables or in an area that is easily accessible to all children during meals and ASP snacks; and
- providing a water fountain or a faucet that allows students to fill their own bottles or cups with drinking water. The location of the water fountain must be in the foodservice area or immediately adjacent, such as a water fountain that is right outside the door to the foodservice area and accessible to all students during the meal period.



While water must be made available to students during meal service, water is not a meal pattern component and is not part of the reimbursable meal or ASP snack. Students are not required to take water. SFAs cannot promote or offer water or any other beverage as an alternative selection to fluid milk throughout the food service area. Commercially packaged water and potable water should not be made available in any manner that interferes with students' selection of the components of reimbursable meals, including low-fat or fat-free milk.

The USDA does not provide separate funding for this provision and SFAs cannot claim reimbursement for water. However, reasonable costs associated with providing potable water would be an allowable cost to the nonprofit food service account.

For more information, see [USDA Memo SP 49-2016 CACFP 18-2016: Resources for Making Potable Water Available in Schools and Child Care Facilities](#), [USDA Memo SP 28-2011: Water Availability During National School Lunch Program Meal Service](#), and [USDA Memo SP 19-2018: Clarification on the Milk and Water Requirements in the School Meal Programs](#).

Meal Identification Signage

Students, servers, and cashiers must be able to identify what constitutes a reimbursable meal. This information is critical to successfully implement OVS and help students choose reimbursable meals.

SFAs must use meal identification signage to instruct students on how much food to select from each component for a reimbursable meal, based on the daily menu's planned servings for each grade group. Signage must be near or at the beginning of the serving line, prior to the point-of-service (POS), and located on the serving line near each food component, as applicable, to prevent unintentional purchases of a la carte items and help students choose a reimbursable meal. This requirement applies to all schools and institutions, including those that implement family-style meal service. For more information, see "[Family-style Meal Service](#)" in this section.

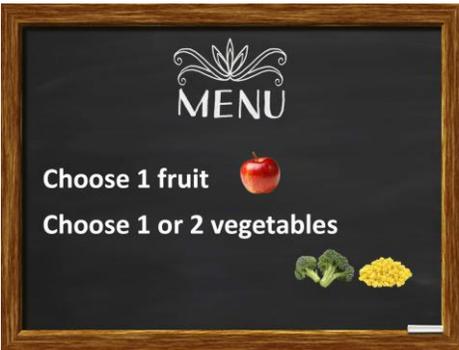
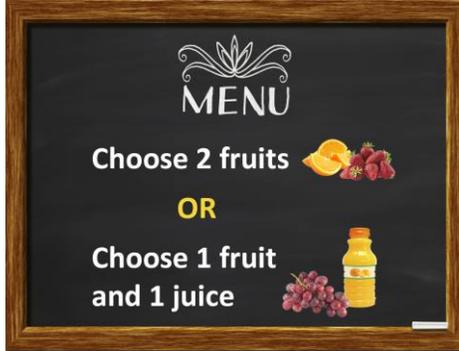
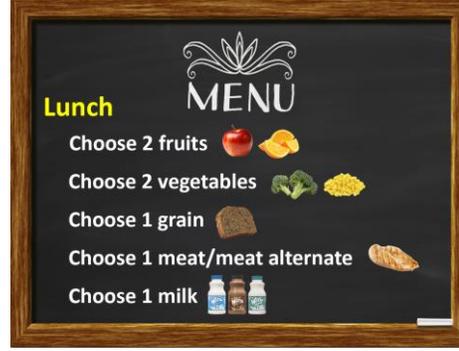
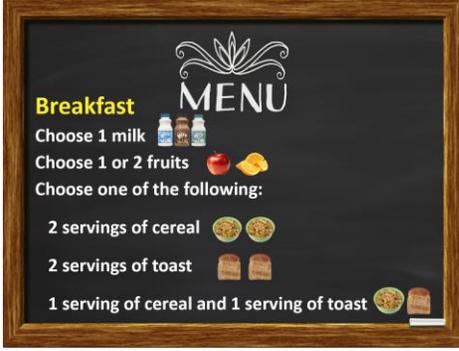
The CSDE requires that signage regarding what and how much students can take must be located at all applicable points in the serving line where the food components are available. For example, if a high school offers fruits and vegetables in ½-cup servings and allows students to select two servings of fruits and two servings of vegetables to meet the minimum daily 1-cup requirement, the cafeteria signage must clearly communicate that students are allowed to select up to two servings of fruits and two servings of vegetables with each meal. This signage must be on the serving line where the fruit and vegetable options are located.

SFAs may choose how to identify the foods that are part of reimbursable meals, based on their facilities, layout, and other considerations. Some examples of acceptable signage include menu boards, posters, signs, labels, static clings, and table tents. Providing detailed information about the food components, such as identifying the vegetable subgroups, is an excellent teaching tool but is not required.

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



Table 5-1 shows some examples of menu signage.

Table 5-1. Examples of menu signage	
 <p>MENU</p> <p>Choose 2 fruits </p> <p>Choose 2 vegetables </p>	 <p>MENU</p> <p>Choose 1 fruit </p> <p>Choose 1 or 2 vegetables </p>
 <p>MENU</p> <p>Choose 2 fruits </p> <p>OR</p> <p>Choose 1 fruit and 1 juice </p>	 <p>MENU</p> <p>Choose One Milk</p> <p>Unflavored low-fat milk </p> <p>Unflavored fat-free milk </p> <p>Chocolate fat-free milk </p>
 <p>Lunch</p> <p>MENU</p> <p>Choose 2 fruits </p> <p>Choose 2 vegetables </p> <p>Choose 1 grain </p> <p>Choose 1 meat/meat alternate </p> <p>Choose 1 milk </p>	 <p>Breakfast</p> <p>MENU</p> <p>Choose 1 milk </p> <p>Choose 1 or 2 fruits </p> <p>Choose one of the following:</p> <p>2 servings of cereal </p> <p>2 servings of toast </p> <p>1 serving of cereal and 1 serving of toast </p>

Menus are not required to itemize specific portion sizes or food items (such as the vegetable subgroups) if this information is listed on the school's production records. For example, a menu can list "daily salad bar," "fruit choice," or "vegetable choice" if the production record includes all food items and amounts served, and the SFA has appropriate documentation on

file, including CN labels, PFS forms, standardized recipes, and nutrition information. For information on the documentation requirements for school meals, see section 2.

Signage is not required for field trips, breakfast in the classroom, and other venues where signage may be problematic. If choices are offered, SFAs should use other methods to inform students about what to select and whether OVS is implemented. For information on OVS, see the CSDE’s guide, *Offer versus Serve Guide for School Meals*.

For resources on signage, see “Signage and Posters” in the CSDE’s resource list, *Menu Planning and Food Production*, and the CSDE’s *Offer versus Serve for Grades K-12 in School Nutrition Programs* webpage.

Multiple Serving Lines

When SFAs offer a variety of meals or have multiple serving lines, the USDA’s regulations require that schools make all required food components available to all students on every lunch line, in at least the minimum required amounts. For the purposes of meeting the meal pattern requirements, menu planners should think of each serving line as its own entity. The daily and weekly requirements must be in place for **each** line. For example, when schools have multiple serving lines with different menu items, each serving line must offer all of the vegetable subgroups during the week and provide the minimum weekly servings of the grains and meat/meat alternates components.

When schools have serving stations where students can go to several different places to select different components of the meal before passing the POS, all stations as a whole must meet the daily and weekly requirements. An example might be a food court or scatter system where every student can select meal components from an entree line, a salad bar with vegetables and fruits, a pasta and bread station, and a milk cooler, before reaching the cashier. It is important to note that these types of food service systems are not typical in most Connecticut schools. In general, SFAs must plan to make all required daily and weekly food components available to all students on every lunch line.

For guidance on how SFAs with multiple serving lines can comply with the vegetable subgroups requirement, see “Offering vegetable subgroups on multiple serving lines” in section 3.

Pre-plated Meals and Vending Machines

Pre-plated meals offer all food components or food items in the quantities required for each grade group in an entirely or partially pre-served manner. Pre-plated meals and vending machines must offer all components and quantities required for each grade group, including the daily and weekly minimums and vegetable subgroups. For example, a meal vending machine that allows students to choose one sandwich would meet the weekly vegetable subgroups requirement if it also offers a selection of all vegetable subgroups during the week.

To the extent possible, schools are encouraged to modify their meal service systems to include OVS opportunities such as pre-plating some items and allowing students a choice of others, e.g., providing a basket with a variety of fruits or a separate cooler with milk choices. For information on OVS, see the CSDE’s guide, *Offer versus Serve Guide for School Meals*.

Field Trip Lunches

Meals offered to students for school-supervised field trips are reimbursable if they meet the daily meal pattern requirements for each grade group, and are served and consumed as part of a school-related function. These functions must be part of the curriculum, as defined by the CSDE, and cannot be extracurricular events.

SFAs must offer the full quantities of all five components, including fluid milk. SFAs cannot substitute juice or water for milk on field trips. SFAs may want to consider using aseptically packaged milk for field trips. Field trip meals must comply with Hazard Analysis and Critical Control Point (HACCP). The SFA’s standard operating procedures (SOP) for field trip meals must include appropriate food safety procedures (such as ice packs and coolers) to ensure that field trip meals stay at proper temperatures.



SFAs are not required to adjust the planned weekly menu to account for occasional field trips, or pack the same vegetable offering from that day’s “hot” lunch menu for a field trip. SFAs have the option to offer a different vegetable from another subgroup or a different vegetable from the same subgroup. For example, if the regular menu includes cooked carrots (red/orange subgroup), the field trip lunch could include raw carrot sticks (red/orange subgroup) or celery (“other” subgroup).

SFAs must include field trip meals when planning meals that meet the minimum weekly requirements for the grains component and meat/meat alternates component, and the dietary specifications for calories, saturated fat, trans fat, and sodium. For information on planning school meals to meet the dietary specifications, see section 6.

Note: The NSLP and SBP regulations require that reimbursable meals must be served and consumed as part of the school program on school premises or school-related premises.

School meals given to children to take home are not reimbursable. For more information, see USDA’s [FNS Instruction 786-8: Reimbursement for Off-Site Meal Consumption](#).

Family-style Meal Service

Family style is a type of meal service that allows children to serve themselves from common platters of food with assistance from supervising adults. While family-style meal service is allowable in the NSLP and SBP, implementation may not be practical in most schools. If SFAs implement family-style meal service, meals must follow the procedures below to ensure compliance and be eligible for reimbursement.

- A sufficient amount of prepared food and at least two varieties of milk must be placed on each table to provide the full required portions of each of the food components for all children at the table and to accommodate the supervising adults. **Note:** The allowable types of milk for grades K-12 include low-fat milk (unflavored or flavored) and fat-free milk (unflavored or flavored). For more information, see “Milk Component” in section 3.
- Children must initially be offered the full required portion of each meal component. Meals must meet the daily and weekly requirements, and the weekly dietary specifications. However, since replenishment is immediately available at each table, students may select an initial serving of a food component or food item that is less than the full required minimum quantity. The supervising adult should encourage additional portions and selections to meet the full required minimum serving size as appropriate, provided the weekly dietary specifications are not exceeded.
- During the course of the meal, the supervising adults are responsible for actively encouraging each child to accept service of the full required portion (minimum daily serving) for each food component of the USDA’s meal patterns. For example, if a child initially refuses a food component or does not accept the full required portion, the supervising adults should offer the food component to the child again. The requirements for family-style meal service are different depending on whether the school implements OVS.
 - **Schools without OVS:** If a school or institution does not implement OVS, children must take the minimum portion size of all five food components at lunch and all three food items at breakfast to count as a reimbursable meal. **Note:** OVS is required in senior high schools for lunch. OVS is optional for all grades at breakfast.

- **Schools with OVS:** If a school or institution implements OVS at lunch, children must take at least three of the five food components offered, including at least ½ cup of fruits or vegetables and the full serving (minimum daily amount) of at least two other components. If a school or institution implements OVS at breakfast, students must select at least ½ cup of fruits (or vegetables, if offered) and the full serving of at least two other food items. For more information, see the CSDE’s guide, *Offer versus Serve Guide for School Meals*.
- SFAs must plan and offer the required food quantities for each child participating in the meal. These offered amounts must meet the minimum daily and weekly food components and the weekly dietary specifications.
- SFAs cannot claim second meals and second servings for reimbursement. Schools can claim only one reimbursable breakfast and one reimbursable lunch for each child per day. If a school elects to offer second servings of any part of the reimbursable meal without charging an a la carte price, these foods must count toward the daily and weekly meal pattern requirements and the weekly dietary specifications. Second servings of any foods must contain zero trans fat and their inclusion cannot cause the menu to exceed the average weekly limits for calories, saturated fats, and sodium.

Family-style meal service must be strictly supervised to ensure that schools serve reimbursable meals and follow adequate daily collection procedures. An adult must be present and monitor the entire process at each table to ensure that students take a reimbursable meal. The adult must track students each day to determine who ate lunch in each meal eligibility category (free, reduced, and paid), without overt identification of the student’s eligibility status.

Avoiding compliance issues with family-style meal service

The CSDE has observed many compliance issues with family-style meal service. SFAs must carefully consider whether they can successfully implement family-style meal service so that all meals comply with the USDA’s requirements. Due to the high level of supervision required during family-style meal service, many schools do not implement this type of meal service.

SFAs that choose to implement family-style meal service must submit their current written procedures to the CSDE. These procedures must indicate how the SFA will implement family-style meal service, and must provide assurances that the SFA will:

- prepare and offer the minimum serving for each required component in the NSLP and SBP meal patterns;
- monitor reimbursable meals by a trained supervising adult at each table;
- claim meals based on a student’s free, reduced, or paid status;

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- prevent overt identification during family-style meal service;
- conduct and document adequate training for supervising adults, including how to implement family-style meal service, the NSLP and SBP meal pattern requirements, and what constitutes a reimbursable meal.

These procedures must be shared with all staff and supervising adults involved in implementing family-style meal service, and must be available for audit purposes.

For additional guidance, see [USDA Memo SP 35-2011: Clarification on the Use of Offer Versus Serve and Family Style Meal Service](#). SFAs may contact their assigned CSDE school nutrition consultant for technical assistance. For more information, see the CSDE's handout, [County Assignments for School Nutrition Programs](#).

