

Requirements for Classroom Meals in the National School Lunch Program and School Breakfast Program

Serving meals in the classroom is an allowable meal service method for the U.S. Department of Agriculture's (USDA) National School Lunch Program (NSLP) and School Breakfast Program (SBP). School food authorities (SFAs) must ensure that food service and non-food service staff (such as teachers, teacher aides, and other applicable classroom staff) involved with classroom meals understand and implement the USDA's requirements for reimbursable meals in the classroom. The Connecticut State Department of Education (CSDE) strongly recommends that SFAs develop standard operating procedures (SOP) for classroom meals.

Common Compliance Issues with Classroom Meals

During recent Administrative Reviews of the NSLP and SBP, the CSDE's school nutrition programs staff has observed multiple common compliance issues with classroom meals. These compliance issues include:

- lack of point-of-service (POS) meal counts, such as using classroom attendance or the number of meals sent to the classroom as meal counts;
- students taking meal counts as a responsibility or reward;
- incorrect implementation of offer versus serve (OVS);
- lack of procedures to ensure that substitute teachers understand the requirements for identifying reimbursable meals and determining POS meal counts;
- incorrectly identifying reimbursable meals (especially non-food service staff);
- not offering the full-required 1 cup of fruits or vegetables at breakfast;
- students not selecting the required ½ cup of fruits or vegetables for a reimbursable lunch or breakfast under OVS;
- not offering a variety of milk;
- lack of classroom monitoring by the SFA, including reimbursable meals, meal counts, and leftover meals or foods (including milk); and
- lack of proper training for food service and non-food service staff, including annual civil rights training.



This document provides guidance for SFAs on the USDA's requirements for classroom meals and how to avoid compliance issues.

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Overview of Requirements for Reimbursable Classroom Meals

Classroom meals must meet the criteria below to qualify for NSLP and SBP reimbursement.

1. Classroom meals must meet the meal pattern requirements for the appropriate grade group. For more information, see “Meal Pattern Compliance for Grades K-12” below and “Meal Pattern Compliance for Preschoolers” on page 3.
2. SFAs must record classroom meals on the school’s daily food production record. For more information on production records, see the CSDE’s handout, [Requirements for Production Records in School Nutrition Programs](#), and visit the CSDE’s [Production Records for School Nutrition Programs](#) webpage.
3. Classroom lunches must be served between 10:00 a.m. and 2:00 p.m. Classroom breakfasts must be served at or close to the beginning of the child’s day at school. For more information, see “Timing of Meals” of page 7.
4. SFAs must develop a local process to accurately count classroom meals. Classroom staff must conduct POS meal counts. For more information, see “Meal Counts” on page 3.
5. School food service staff, teachers, other school staff, parents, and volunteers must follow appropriate food safety practices. For more information, see “Food Safety” on page 6.

Meal Pattern Compliance for Grades K-12

SFAs must ensure that all classroom meals for grades K-12 meet the NSLP and SBP meal pattern requirements for the appropriate grade group (K-5, 6-8, or 9-12). The meal patterns for grades K-12 require daily and weekly amounts of five food components for lunch (milk, fruits, vegetables, grains, and meat/meat alternates) and three food components for breakfast (milk, fruits (including vegetable substitutions), and grains. At breakfast, the meat/meat alternates component may be offered in place of the grains component after offering 1 ounce equivalent (oz eq) of grains. For example, a breakfast menu that includes a 1-oz eq whole-grain bagel may also include 2 tablespoons of peanut butter (1 oz eq of meat/meat alternates). Meat/meat alternate substitutions credit toward the daily and weekly servings of grains.

Lunch and breakfast menus must meet the USDA’s weekly dietary specifications (nutrition standards) for calories, saturated fats, and sodium. In addition, all food products and ingredients used to prepare school meals must contain zero grams of trans fats per serving. For more information on the NSLP and SBP meal patterns and dietary specifications for grades K-12, visit the CSDE’s [Meal Patterns for Grades K-12 in School Nutrition Programs](#) webpage and review the CSDE’s publication, [Menu Planning Guide for School Meals for Grades K-12](#).

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Meal Pattern Compliance for Preschoolers

SFAs must ensure that all classroom meals for preschoolers meet the NSLP and SBP meal pattern requirements for the appropriate age group (1-2 or 3-4). The meal patterns for preschoolers require daily amounts of five food components for lunch (milk, fruits, vegetables, grains, and meat/meat alternates) and three food components for breakfast (milk, fruits and vegetables, and grains). Milk must be unflavored whole milk for age 1 and unflavored low-fat (1%) or fat-free milk for ages 2-4. Flavored milk cannot be served to preschoolers.

Unlike the meal patterns for grades K-12, the preschool meal patterns do not require weekly servings of the meal components or weekly dietary specifications. However, the preschool meal patterns require nutrition standards for some specific foods, such as sugar limits for yogurt and breakfast cereals. For more information, see the CSDE's handouts, [Crediting Yogurt for Preschoolers in the NSLP, SBP, and ASP](#) and [Crediting Breakfast Cereals for Preschoolers in the NSLP, SBP, and ASP](#). For information on the NSLP and SBP meal patterns for preschoolers, visit the CSDE's [Meal Patterns for Preschoolers in School Nutrition Programs](#) webpage and review the CSDE's publication, [Menu Planning Guide for Preschoolers in the NSLP, SBP, and ASP](#).

Meal Counts

The USDA requires that NSLP and SBP meal counts for all grades must be determined at the POS. For classroom meals, the POS is the point in the classroom meal service where classroom staff can accurately determine that they have served all of the required components for a reimbursable meal to the child. The USDA does not allow any other methods to determine classroom meal counts, such as student attendance, student orders for meals in advance of the meal service, the number of meals sent to the classroom, or the number of meals returned from the classroom. Meal counts must be taken by trained staff. Students cannot take meal counts.



Acceptable POS meal count procedures

SFAs must develop a local process to obtain accurate POS meal counts for classroom meals. The example below shows an acceptable procedure for classroom meal counts.

The teacher has an attendance roster of the students in the classroom. During mealtime in the classroom, the teacher checks off the student's name after verifying that the student has received all of the components for a reimbursable meal. The teacher returns the completed student roster to the cafeteria after the classroom meal service. The cafeteria manager reviews the information on the completed student roster by comparing the meal counts to the number of leftover meals. The cafeteria manager adds the number of classroom meals to the school's lunch counts for that day.

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Meal count instructions

The SFA's SOP for classrooms meals should include clear meal count instructions for classrooms staff that indicate how to identify reimbursable meals (including reimbursable meals with OVS, if applicable), how to take POS meal counts, how to handle leftover meals or foods (including milk), and a plan for informing substitutes of the requirements for classroom meals. As a best practice, SFAs should include the meal count instructions with the daily delivery of the classroom meals. This helps everyone understand the required procedures and prevents staffing variations (such as teacher absences, substitutes, and parent volunteers) from resulting in noncompliant meals.

Offer versus Serve (Grades K-12 Only)

OVS is a concept that applies to menu planning and the determination of reimbursable meals for grades K-12 in the NSLP, SBP, and Seamless Summer Option (SSO) of the NSLP. It allows students to decline a certain number of food components in the meal and select the foods they prefer to eat, while reducing food cost and waste. OVS must be implemented at lunch in senior high schools, but is optional for all other grades. OVS is optional for all grades in the SBP. OVS is not allowed for preschoolers (ages 1-4) or the Afterschool Snack Program (ASP) of the NSLP.

Classroom meals for preschoolers cannot implement OVS.

To implement OVS with classroom meals for grades K-12, SFAs must offer choices that include the required amounts of each meal pattern component (lunch) or food item (breakfast), and students must select the minimum number of food components (lunch) or food items (breakfast) for a reimbursable meal.

- **OVS at lunch:** SFAs must offer all five food components in at least the full serving (minimum daily amount) for each grade group in the NSLP meal pattern. For a reimbursable lunch under OVS, students must select at least ½ cup of fruits or vegetables, and the full serving of at least two other food components. For more information, see the CSDE's handout, [OVS in the NSLP](#), and the CSDE's publication, [Offer versus Serve Guide for School Meals](#).
- **OVS at breakfast:** SFAs must offer at least four food items from the three food components in at least the full serving (minimum daily amount) for each grade group in the SBP meal pattern. The four food items may include two servings of grains (either two of the same grain or two different grains) or two servings of fruit (either two of the same fruit or two different fruits), but cannot include two servings of milk. For a reimbursable breakfast under OVS, students must select at least three food items, including ½ cup of fruit (or vegetable substitutions, if offered). For more information, see the CSDE's handout, [OVS in the SBP](#), and the CSDE's publication, [Offer versus Serve Guide for School Meals](#).



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SFAs must provide appropriate training for classroom staff to ensure they understand how to identify reimbursable meals when implementing OVS in the classroom. For additional guidance on OVS, visit the CSDE's [Offer versus Serve for Grades K-12 in School Nutrition Programs](#) webpage. For meal pattern training resources, visit the CSDE's [Meal Pattern Training for School Nutrition Programs](#) webpage.

Family-style Meal Service in the Classroom

Family-style meal service allows preschoolers and students in grades K-12 to serve themselves from common dishes of food with assistance from supervising adults. While family-style meal service allows students to make choices in selecting foods, the supervising adult should initially offer the full serving (minimum daily amount) of each food component to each student. However, since replenishment is immediately available at each table, the initial serving of a food component may be less than the full-required serving. The supervising adult should encourage additional portions and selections to meet the full serving, as appropriate.

The USDA requires some additional different family-style meal service practices for grades K-12 and preschoolers. These requirements are summarized below.

Grades K-12

SFAs must plan and offer the full-required food quantities for each child participating in the meal. These offered amounts must meet the minimum daily and weekly food components for each grade group, and the weekly dietary specifications. **Family-style meal service must be strictly supervised to ensure that classrooms serve reimbursable meals and take appropriate POS meal counts.** An adult must be present and monitor the entire process at each table to ensure that students take a reimbursable meal. The requirements for a reimbursable meal depend on whether the family-style meal service also implements OVS.

- **Family-style meals without OVS:** If the school does not implement OVS, students must take the full serving (minimum daily amount) of all five food components at lunch, and the full serving of all three food components at breakfast, to count as a reimbursable meal.
- **Family-style meals with OVS:** If the school implements OVS, the supervising adult must ensure that each student selects at least $\frac{1}{2}$ cup of fruit or vegetable (or combination of both) during the course of the family-style meal service, and the full serving of the other selected components. At lunch, students must take at least three of the five food components offered, including at least $\frac{1}{2}$ cup of fruits or vegetables and the full serving of at least two other components. At breakfast, students must select at least $\frac{1}{2}$ cup of fruits (or vegetables, if offered) and the full serving of at least two other food items.

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For additional guidance on family-style meal service for grades K-12, see section 4 of the CSDE's publication, [Menu Planning Guide for School Meals for Grades K-12](#), and [USDA Memo SP 35-2011 and CACFP 23-2011: Clarification on the Use of Offer versus Serve and Family Style Meal Service](#).

Preschoolers (ages 1-4)

SFAs must plan and offer the full-required food quantities for each child participating in the meal. If children do not take the full serving (minimum daily amount) of a food component, the meal is still reimbursable. The supervising adult should encourage additional portions and selections to meet the full-required serving, as appropriate. For additional guidance on family-style meal service for preschoolers, see section 4 of the CSDE's publication, [Menu Planning Guide for Preschoolers in the NSLP, SBP, and ASP](#), and [USDA Memo SP 35-2011 and CACFP 23-2011: Clarification on the Use of Offer versus Serve and Family Style Meal Service](#).

Food Safety

The USDA regulations ([7 CFR 210.13\(c\)](#)) require SFAs to develop a written food safety plan for compliance with Hazard Analysis Critical Control Point (HACCP). HACCP is a systematic approach to reduce the risk of foodborne hazards by focusing on each step of the food preparation process. For more information, see the USDA's publication, [Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles](#).



Classroom meals must comply with HACCP and must be part of the SFA's food safety plan. The greatest food safety concern for classroom meals is ensuring that potentially hazardous foods (PHFs) stay at proper temperatures during transport and service. PHFs are foods that require temperature control because they are capable of supporting rapid bacterial growth that can lead to foodborne illness. PHFs include milk and milk products; meat (beef, pork, lamb, and poultry); fish; shellfish; shell eggs; cut melons; cut tomatoes; cut leafy greens; baked potatoes; cooked rice, beans, and vegetables; tofu or other soy proteins; and sprouts and sprout seeds.

The SFA's SOP for classroom meals should include appropriate food safety procedures for PHFs during meal preparation, transport, and service. School food service staff and classroom staff must work together to ensure that classroom meals are safe to eat. For SOP examples, see the Iowa State University's handout, [Standard Operating Procedure: Breakfast in the Classroom](#), the Institute of Child Nutrition's (ICN) sample SOP, [Transporting Food to Remote Sites \(Satellite Kitchens\)](#) and [Hot and Cold Holding for Time Temperature Control for Safe Foods](#), and the ICN's [Standard Operating Procedures](#) webpage.

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Timing of Meals

The NSLP 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. The SBP regulations ([7 CFR 220.2](#)) require that breakfast must be served at or close to the beginning of the child's day at school. These requirements apply to all NSLP and SBP meals, including classroom meals. For more information on the requirements for lunch periods in the NSLP, see [CSDE Circular Letter C-9: Federal and State Requirements for Provision and Timeframe of Daily Lunch Period for Students](#) and [CSDE Operational Memorandum No. 10-19: Requirements for Lunch Periods in the NSLP](#).

Staff Training

SFAs must provide appropriate job-specific training for all employees, including non-food service staff, whose responsibilities include duties related to the operation of school nutrition programs. For example, teachers, teacher aides, and other applicable staff who conduct meal counts in the classroom must receive appropriate training to ensure they perform their jobs effectively and in compliance with the USDA's regulations. For meal pattern training resources, visit the CSDE's [Meal Pattern Training for School Nutrition Programs](#) webpage.

In addition, the USDA requires annual civil rights training for all staff who interact with NSLP and SBP applicants or participants, including staff involved with classroom meals. SFAs should use the CSDE's PowerPoint presentation, *Civil Rights: Your Responsibilities in the School Nutrition Programs PowerPoint Presentation*, to provide civil rights training for food service and non-food service staff. This presentation is available under "School Nutrition Programs" on the CSDE's [Civil Rights for Child Nutrition Programs](#) webpage.



SFAs must log all staff training on the SFA's annual professional standards tracking log. This includes training for classroom staff whose responsibilities include duties related to the operation of school nutrition programs. For more information, see the CSDE's [Professional Standards Tracker Log](#), and the USDA's publication, *Guide to Professional Standards for School Nutrition Programs*, and visit the CSDE's [Professional Standards for School Nutrition Professionals](#) webpage.

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Monitoring

SFAs must conduct on-site monitoring to determine if classroom staff is following the correct procedures for identifying reimbursable meals and determining POS meal counts. SFAs must review how and when classroom staff takes meal counts, and how classroom staff handles leftover meals or foods (including milk).

Monitoring should include a review of classroom meal counts for any indicators of potential problems, such as having the same meal count every day or not returning leftovers to the kitchen. For example, meal count procedures could be incorrect if:

- a classroom indicates the same number of breakfasts each day for the month of October; or
- a classroom receives 20 breakfasts every day and the daily meal count varies from 12 to 16 meals, but leftover meals are not returned to the kitchen.



SFAs should train cafeteria managers to reconcile the daily classroom meal counts with the number of leftover meals. To ensure that the cafeteria enters accurate meal counts into the SFA's meal counting system, cafeteria managers should immediately address any meal count discrepancies with the classroom teacher.

Best Practices

The CSDE strongly recommends the following best practices to ensure compliance with the USDA's requirements for classroom meals in the NSLP and SBP.

- Implement grab-and-go classroom meals and use school food service staff to take meal counts. **Note:** The CSDE strongly recommends this meal service method to eliminate potential compliance issues with classroom POS meal counts.
- Develop a SOP that includes clear written procedures regarding the requirements for classroom meals. The SOP should address:
 - how the classroom provides meal orders to the cafeteria;
 - appropriate food safety procedures for transporting, setting up, serving, and cleaning up of classroom meals, including temperature control, cleaning and sanitizing of student desks and food-contact surfaces, handwashing, and proper food handling procedures during preparation and meal service;

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- how to identify reimbursable meals (including reimbursable meals with family-style meal service and OVS, if applicable);
 - instructions for conducting classroom POS meal counts;
 - how to handle leftover meals or foods (including milk); and
 - a plan for informing substitutes of the requirements for classroom meals.
- Disseminate the district's SOP for classroom meals to food service staff and all applicable classroom staff, including teachers, teacher aides, and other applicable staff; and post on the SFA's website.
 - Provide regular training (at least annually) for all food service and non-food service staff involved with classroom meals.
 - Include POS meal count instructions for classroom staff with the delivery of the daily classroom meals. For example, SFAs could laminate the meal count instructions and attach to the food transport containers.
 - Use clear signage on the food carts or coolers for each classroom to help classroom staff identify the required meal components.
 - Reinforce proper procedures for classroom meals through various communication channels, such as staff meetings, e-mails, employee handbooks, written instructions, and the SFA's website.
 - Conduct regular monitoring of each classroom for compliance with the USDA's requirements for identifying reimbursable meals and determining POS meal counts.

For additional guidance and technical assistance on implementing classroom meals, contact your [county consultant](#) for school nutrition programs.



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Resources

Allowable Milk Substitutes for Children without Disabilities in School Nutrition Programs (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/Milksub.pdf>

Civil Rights for Child Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Civil-Rights-for-Child-Nutrition-Programs>

Crediting Foods for Grades K-12 in School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-School-Nutrition-Programs>

CSDE Circular Letter C-9: Federal and State Requirements for Provision and Timeframe of Daily Lunch Period for Students:

<https://portal.ct.gov/-/media/SDE/Circular-Letters/circ07-08/C9.pdf>

CSDE Operational Memorandum No. 10-19: Requirements for Lunch Periods in the NSLP:

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Memos/OM2019/OM10-19.pdf>

Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles (USDA):

https://fns-prod.azureedge.net/sites/default/files/Food_Safety_HACCPGuidance.pdf

Guide to Professional Standards for School Nutrition Programs (USDA):

https://fns-prod.azureedge.net/sites/default/files/tn/ps_guide.pdf

HACCP-Based SOPs: Hot and Cold Holding for Time Temperature Control for Safe Foods (ICN):

<https://theicn.org/resources/181/food-safety-standard-operating-procedures/105686/hot-and-cold-holding-for-time-temperature-control-for-safe-foods.docx>

HACCP-Based SOPs: Transporting Food to Remote Sites (Satellite Kitchens) (ICN):

<https://theicn.org/resources/181/food-safety-standard-operating-procedures/105731/transporting-food-to-remote-sites-satellite-kitchens.docx>

Meal Counting and Claiming for School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Meal-Counting-and-Claiming-for-School-Nutrition-Programs>

Meal Pattern Training for School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Meal-Pattern-Training-Materials>

Meal Patterns for Grades K-12 in School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-School-Nutrition-Programs>

Meal Patterns for Preschoolers in School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-Preschoolers-in-School-Nutrition-Programs>

Menu Planning Guide for Preschoolers in the NSLP, SBP, and ASP (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Preschool/MPGpreschool.pdf>

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Menu Planning Guide for School Meals for Grades K-12 (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Menu-Planning-Guide-for-School-Meals>

National School Lunch Program (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/National-School-Lunch-Program>

Offer versus Serve Guide for School Meals (CSDE):

<https://portal.ct.gov/SDE/Nutrition/-/media/SDE/Nutrition/NSLP/OVS/OVSGuide.pdf>

OVS in the NSLP (CSDE):

<https://portal.ct.gov/SDE/Nutrition/-/media/SDE/Nutrition/NSLP/OVS/OVSNsLP.pdf>

OVS in the SBP (CSDE):

<https://portal.ct.gov/SDE/Nutrition/-/media/SDE/Nutrition/NSLP/OVS/OVSSBP.pdf>

Production Records for School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Production-Records-for-School-Nutrition-Programs>

Professional Standards for School Nutrition Professionals (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Professional-Standards-for-School-Nutrition-Professionals>

Professional Standards Tracker Log (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Forms/ProfStdTracker.xlsx>

Requirements for Production Records in School Nutrition Programs (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Forms/ProdRecord/ProductionRecords.pdf>

School Breakfast Program (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/School-Breakfast-Program>

Standard Operating Procedure: Breakfast in the Classroom (Iowa State University):

<https://iastate.app.box.com/s/4f2w7toe7yickt08s7pdx86a29bj0dc>

Standard Operating Procedures (ICN webpage):

<https://theicn.org/icn-resources-a-z/standard-operating-procedures/>

USDA Memo SP 35-2011 and CACFP 23-2011: Clarification on the Use of Offer versus Serve and Family Style Meal Service:

<https://www.fns.usda.gov/clarification-use-offer-vs-serve-and-family-style-meal-service>

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For more information, see the CSDE's [Meal Counting and Claiming for School Nutrition Programs](#) webpage or contact the [school nutrition programs staff](#) in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This document is available at <https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Forms/MealCount/ClassroomMeals.pdf>.

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- (1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

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