



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Sponsors of the School Child Nutrition Programs

FROM: John Frassinelli, Chief
Bureau of Health/Nutrition, Family Services and Adult Education

DATE: July 11, 2013

SUBJECT: Operational Memorandum #38-13
Updated Offer versus Serve Guidance for the National School Lunch Program
and School Breakfast Program in School Year 2013-14

Offer versus Serve (OVS) is a provision in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) that allows students to decline some of the food offered. The goals of OVS are to reduce food waste in the school meal programs while permitting students to decline foods they do not intend to eat. OVS is optional at all grade levels for breakfast and required at the senior high school level only for lunch.

Attached is the U.S. Department of Agriculture's (USDA) updated guidance manual for operators implementing OVS. Since some of the NSLP and SBP meal pattern requirements are being phased in over multiple years, this memorandum provides guidance **only for school year 2013-14**. The USDA will revise this guidance as needed to reflect new requirements as they take effect.

This guidance is intended to clarify the requirements of OVS, specifically related to what students must take in order to have a reimbursable meal.

OVS at Lunch

At lunch, schools must offer students all five required food components in at least the minimum required amounts. The lunch components are:

1. meats/meat alternates;
2. grains;
3. fruits;
4. vegetables; and
5. milk.

Under OVS, a student must take at least three components in the required serving sizes. One selection must be at least ½ cup from either the fruits or vegetables component.

OVS at Breakfast

At breakfast, schools must offer students all three required food components in at least the minimum required amounts. The breakfast components are:

1. grains (with optional meats/meat alternates allowed);
2. juice/fruit/vegetable; and
3. milk.

Under OVS, a student must be offered at least four food items and must select at least three food items. For SY 2013-14, students are **not** required to take a minimum of ½ cup of fruits or vegetables for OVS.

For information on the meal patterns for lunch and breakfast, see the Connecticut State Department of Education's (CSDE) Web pages for [five-day week menus](#) and [seven-day week menus](#). For questions regarding the meal pattern requirements, please refer to the following documents:

- USDA's *Final Rule "Nutrition Standards in the National School Lunch and School Breakfast Programs" Questions & Answers for Program Operators*, dated January 25, 2013; and
- CSDE's [Operational Memorandum 37-13](#): Revised Questions and Answers on the School Breakfast Program Meal Pattern in School Year 2013-14, dated July 11, 2013.

Questions pertaining to this memorandum may be directed to the following:

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JF:sff

Attachment

Important: This is a numbered Operational Memorandum that contains important program information. Please read carefully and retain in a binder for your future reference. Operational Memoranda are also posted on the Child Nutrition Web site at <http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=320676>.



SCHOOL YEAR 2013-2014

OFFER VERSUS SERVE
GUIDANCE FOR THE NATIONAL SCHOOL LUNCH PROGRAM
AND THE SCHOOL BREAKFAST PROGRAM

FOOD AND NUTRITION SERVICE U.S.
DEPARTMENT OF AGRICULTURE



This guidance replaces the 2004 edition of the *Offer versus Serve in the School Nutrition Programs Resource Guide*. In addition, please note that this guidance will be revised for School Year 2014-2015 and beyond to reflect newly implemented meal pattern requirements as they are phased-in.

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Background/General Information

Offer versus serve or OVS is a concept that applies to menu planning and the meal service. OVS allows students to decline some of the food offered in a reimbursable lunch or breakfast. The goals of OVS are to reduce food waste and to permit students to choose the foods they want to eat. Because students may choose fewer selections under OVS, guidance is provided on what constitutes a reimbursable lunch and breakfast.

For the National School Lunch Program (NSLP), OVS is established under section 9(a)(3) of the Richard B. Russell National School Lunch Act. OVS was extended to the School Breakfast Program (SBP) in 1985 under section 4(e)(2) of the Child Nutrition Act of 1966. The regulations on OVS for the NSLP are found at 7 CFR 210.10 (e) and for the SBP at 7 CFR 220.8 (e).

Because parts of the NSLP and SBP meal patterns are being phased-in over multiple years, this guidance document reflects only those OVS and applicable crediting requirements in effect in School Year 2013-2014. The guidance will be revised as needed to reflect new requirements as they are phased-in.

Use of OVS in the Child and Adult Care Food Program and Summer Food Service Program

OVS is optional for school food authorities (SFAs) providing meals through the at-risk afterschool meals component of the Child and Adult Care Food Program. OVS is also optional for summer meals offered by SFAs through the Summer Food Service Program. When used for these programs SFAs must follow the applicable requirements outlined in this guidance. OVS cannot be used for snacks in any program.

OVS Basics Shared by NSLP and SBP

Unit Pricing

School meals must be priced (for the paid and reduced price categories) as a unit. This means that one price is established for a complete reimbursable meal in the paid meal category and one price is established for a complete reimbursable meal in the reduced price meal category. SFAs may set different unit prices for various combinations of foods offered. For example, if students are offered reimbursable meals centered around a variety of entrées, such as a hamburger, chef's salad, lasagna or a turkey sandwich, the SFA may set four unit prices depending on which entrée is selected.

OVS does not affect the meal's unit price established by the SFA. Students who take 3, 4, or 5 food components for lunch or 3 or more food items for breakfast pay the same price. The unit price is also not

affected if the student selects the required serving sizes for 3 food components for lunch (or 3 food items for breakfast) and also selects less than the required serving size of additional food components.

Identifying Reimbursable Meals under OVS (Signage, Menus, and Training)

Students, servers and cashiers must be able to identify what constitutes a reimbursable meal. The NSLP regulation at 7 CFR 210.10(a)(2) requires that schools identify, near or at the beginning of serving lines, what foods constitute unit priced reimbursable meals. Schools using OVS must also identify what a student must select in order to have a reimbursable meal under OVS. In addition to signage or other methods used in the food service areas, schools should provide information on OVS in materials, such as menus and newsletters, provided to parents or posted on websites.

Students and their parents need to be aware of what is included in the meals offered in school to reinforce nutrition education messages and to allow students to select a reimbursable meal under OVS. Signage as well as menus should provide clear information about allowable choices. This will help students easily determine what comprises a reimbursable meal for OVS and is especially important to avoid problems at the point of service. Schools are encouraged to conduct training for cashiers as well as serving line staff to help students select the required servings and food components/food items needed for reimbursable lunches and breakfasts.

Signage is not required for field trips, breakfast in the classroom and other venues where signage may be problematic. However, if choices are offered, other methods should be used to inform students what to select and whether OVS is implemented for these situations.

Offering Choices Within the Components is Not OVS

We continue to support and encourage the practice of offering a variety of food choices to students; this increases the likelihood that these students will select the foods and beverages they prefer, which increases consumption and reduces waste. However, it is important to recognize, that offering a variety of choices within the food components is different from OVS.

If choices within components are offered, the menu planner must indicate to the students what choices or combination of choices the student may select in order to have a reimbursable meal. One common example is with cereal types. Offering four different types of cereal and instructing students to “select one” is not the same as offering four grain items. The instruction to “select one” indicates that one grains item (cereal) is being offered.

Using another example, for all age/grade groups, at least 1/2 cup of juice/fruit/vegetable must be offered in a reimbursable breakfast in School Year 2013-2014. The menu planner may choose to offer a variety of fruit but instruct the student to select a limited amount. If 1/2 cup portions of three different fruits are

offered, the menu planner could indicate that the student may select “up to two” servings. This provides a variety of food choices to the student and shows the student how to select a reimbursable lunch. Although three different fruits are offered, since the student is instructed to select up to two servings, only two fruit items are being “offered.”

It is at the menu planner’s discretion to determine if variety is offered and how much a student may select. For instance, some menu planners may choose to allow students to select more than the minimum requirement- as shown in the above example, where students can select up to 1 cup of fruit (only ½ cup required). Other menu planners, for cost and waste reasons, may choose to limit children to only the minimum required amounts. Using the example above, the menu planner might instruct the students to “select one” from amongst the three different types of fruits. If that is the case, only one item is being “offered.”

Meal Service Systems

There are a number of different systems used by schools to offer their students reimbursable meals. For example, a school may have cafeteria-style service, kiosks, meals in the classroom and vending machines. At the senior high school level, OVS is required at lunch unless the school or SFA demonstrates to the State agency that their system does not accommodate OVS. This is most common at certain residential child care institutions (RCCIs). Some of the meal systems that may not readily accommodate OVS are discussed below. Schools are strongly encouraged to modify their meal service system to include OVS opportunities to the extent practicable.

Pre-Plated Meals

Pre-plated meals are those that 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 must include at least the daily minimum quantities required under the meal pattern. This system is often used by schools and RCCIs that have logistical limitations for their meal service. These may include facility or space restrictions or situations where children are unable to select the foods offered.

While schools and RCCIs serving pre-plated meals are not required to change their meal service system, they are encouraged to make modifications to accommodate OVS. For example, an RCCI could offer the fruit, vegetable, grain and/or milk components/food items separately to allow students to have some level of choice about what they want to eat. A basket with a variety of fruits and a separate cooler with milk choices would be possible ways to implement OVS in this situation.

Family Style Meals

A school or RCCI may serve meals “family style.” Family style meal service allows students 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 planned serving of each food component/food item to each child. Offered meals must meet all of the daily and weekly food component/food item requirements, as well as the weekly dietary specifications. However, since replenishment is immediately available at each table, the initial *serving* of a food component/food item may be less than the full required minimum serving size. The supervising adult should encourage additional portions and selections as appropriate.

Because of the requirement under OVS for the NLSP (and for the SBP beginning in School Year 2014-2015) that each student select at least ½ cup of a fruit or vegetable, the adult supervisor must ensure that each student selects at least a ½ cup of fruit or vegetable or a combination of both during the course of a family style meal service. For additional information on family style meals, please refer to Policy Memorandum [SP 35-2011, CACFP 23-2011; Clarification on the Use of Offer versus Serve and Family Style Meal Service](#), dated May 17, 2011, which is applicable to the NSLP and SBP as well as to the Child and Adult Care Food Program.

Food Bars

Schools are encouraged to use food bars and salad bars in the meal service as a way to offer a wider variety of vegetables and fruits and to lower plate waste. These bars can be set-up in a variety of ways, including pre-portioned and prepackaged food components/food items to emulate the grab-and-go concept to accommodate a high volume of students in a short period of time. Food and salad bars are permitted with OVS since they enhance the choices available which may assist with students selecting those foods they will consume.

To allow the students and cashiers to easily identify reimbursable meals from food bars, the menu planner must clearly identify the food components/food items provided on the bars and the minimum serving size for each food component or food item. The menu planner must also indicate which foods and combinations of foods the students may choose to select a reimbursable meal under OVS. Cashiers must also be trained and informed daily, if needed, on what constitutes a reimbursable meal at the POS. It is preferable that food and salad bars be located before the point of service. If the food service area cannot accommodate placement before the point of service, the SFA must consult with their State agency for approval of their system to ensure that all students select food components/food items from the bar that meet the meal pattern and OVS requirements. If the food bar is after the point of service, the SFA should have a monitor to ensure that students select the components in the required serving sizes that were credited at the point of service.

One method that may be used to ensure that students select an appropriate amount from these bars is pre-portioning. For additional guidance on use of food bars and salad bars, please refer to Policy Memo [SP 31-2013: *Salad Bars in the National School Lunch Program*](#), dated March 27, 2013.

Pre-Packaged Meals (Bagged or “Grab and Go” Meals)

Pre-packaged meals are similar to pre-plated meals. Pre-packaged meals are allowed at all levels, but at the senior high school level only if the meal service system has these types of meals, in addition to cafeteria lines that allow OVS. Like pre-plated meals, schools are encouraged to have some food components/food items with choices and/or the option to decline, such as fruit or milk. If these meals are offered as part of breakfast in the classroom, field trips, or for students leaving the campus for work study, OVS is not required, even at the senior high level, as this is the usual serving system for these situations.

Menu Planning and OVS

SFAs must plan lunches and breakfasts that meet all meal pattern requirements and provide access to the required types and amounts of food for all students. In addition, menus should reflect student preferences and, as much as possible, offer choices within the components. With OVS, menu planners have flexibility to address participation and selection trends to determine what and how much food to prepare. This flexibility results in cost savings and minimizes food waste.

If choices within components are offered, the menu planner must indicate what choices or combination of choices the student may select in order to have a reimbursable meal. For example, for grades 9-12 at least one cup of fruit must be offered in a reimbursable lunch. Additionally, the menu planner may *choose* to offer a variety of fruit. If ½ cup portions of three different fruits are offered, the menu planner would indicate that the student may select **up to** two ½ cup servings. This provides a variety of food choices to the student and shows the student how to select a reimbursable lunch. OVS is utilized in this example since the student may choose to take no fruit, one ½ cup serving or two ½ cup servings from any of the three types of fruit offered.

Offering choices within components does not necessarily constitute OVS. Schools are encouraged to give students options of entrees and side items and are required to offer a variety of milk. If students are required to select at least one of every component, the SFA is not utilizing OVS. OVS allows students to decline some components entirely.

OVS and a la Carte Sales

Foods offered in reimbursable meals as well as other foods, may also be sold a la carte. Students and cashiers need to know which foods are considered food components/food items for the purposes of a reimbursable meal and OVS.

If a student does not select the required amount or number of food components/food items in the applicable portions, the meal is not reimbursable. Therefore, the school may charge the student a la carte prices for each item selected. As previously discussed, in order to avoid issues at check-out, schools are encouraged to conduct training for cashiers as well as serving line staff to help students select the required servings of food components/food items needed for reimbursable lunches and breakfasts.

OVS and “Extra” Foods

A school may offer extra foods (“foods of minimal nutritional value” as currently defined in the 7 CFR 210.11 and 210, Appendix B for the NSLP and in 7 CFR 220.12 and 220, Appendix B for the SBP cannot be offered as an extra food) that are not creditable for OVS. These foods, such as ice cream or pudding, may be used as a complement to reimbursable meals. This “extra” food may be selected by the student in addition to the meal; but may not be credited toward meeting the minimum number of food components/food items required under OVS. However, these extra foods must be included for the purposes of meeting the weekly dietary specifications, including calories, saturated fat and beginning in School Year 2014-2015, sodium. (Also see Grains Component below on crediting of grain-based desserts.)

Implementing OVS at Lunch

Overview of Menu Planning/OVS Changes in Lunch

Function	Prior to the HHFKA*	HHFKA
Implementation of OVS	Mandatory at the senior high level Optional below senior high school level	No change
Reimbursable Meals Number of Food Components/Food Items	Reimbursable lunches must offer four food components in five food items	Five components
Required number of selections for OVS	Three food items must be selected at senior high level SFA may require that three or four food items be selected for lower grades	Student must select at least three components, one of which must be ½ cup of fruit or vegetable
OVS and fruit and vegetable food components/food items	One component (fruit/vegetable); two food items must be offered from component No requirement to select the component under OVS	Two components. Student must select at least a ½ cup of fruit or vegetables or a total of ½ cup of both
Extra foods offered	Not credited for OVS	No change

* Healthy Hunger-Free Kids Act, Comparison only for food-based menu planning

Definitions

NSLP

A food component is one of five food groups that comprise reimbursable lunches. These are meats/meat alternates; grains; fruits; vegetables; and fluid milk. Schools must always offer all five food components in at least the minimum required amounts.

A food item is a specific food offered within the five food components. For example, a hamburger patty on a bun is one food item with two of the five food components (meat/meat alternate and grains). Separate ½ cup servings of peaches, applesauce and pears are three food items that, when selected, comprise one component.

Under OVS, a student must take at least three components in the required servings (discussed in this guidance for each food component for the NSLP). One selection must be at least ½ cup from either the

fruit or vegetable component. Depending on the planned menu, the student may need to select more than one food item in order to have an adequate amount for a component to be credited for OVS.

Use of OVS in the NSLP

- OVS must be available for students at senior high schools (as defined by the State educational agency).
- OVS is optional at middle and elementary schools (as defined by the State educational agency).
- OVS is not allowed for the NSLP snack service.
- OVS is optional for summer meals offered by school food authorities (SFAs) through the Seamless Summer Option of the NSLP.

The Basics

The meal pattern for lunches consists of five food components:

- Fruits
- Vegetables
- Grains
- Meats/meat alternates (m/ma), and
- Fluid milk.

The age/grade groups for lunches are:

- K-5
- 6-8 and
- 9-12.

Under OVS, all students, at any grade level, must take:

- At least 3 of 5 food components **AND**
- One of the choices selected must be at least a ½ cup serving of the fruit or vegetable component or a ½ cup total serving of both fruit and vegetable.

Three food components are required to support a minimally adequate nutritious meal for students as well as to support the amount of Federal reimbursement. Within each component, different choices may be offered and thus there are many combinations that the student may choose. Example 1a shows a typical menu that allows for choices that may be selected by students for a reimbursable lunch.

EXAMPLE 1a

Menu for Grades 9-12:

Choose 1: hamburger on bun OR turkey sandwich (2 ounce equivalents of grains and 2 ounce equivalents of m/ma each)

Choose up to 2: seasoned corn, green beans, potato wedges (1/2 cup vegetables each)

Choose up to 2: orange slices, fruit cocktail, banana, apple juice (1/2 cup fruit each)

Choose 1: nonfat unflavored milk OR nonfat flavored milk (1 cup milk each, choice required)

* Two 1/2 cup fruit and/or vegetable portions would not count as two components in high school. One or the other must be a full cup to count both as components.

For example, while the menu planner must offer at least one cup each of fruits and vegetables, the student is able to decline some of the offerings as long as at least 1/2 cup of fruit and/or vegetable is selected. Likewise, the student may decline the milk component. Signage and instructions to students are important to assist them in understanding which foods may be declined under OVS. For examples of signage, check out the school meals [Best Practices Sharing Center](#).

Under OVS, the student has a reimbursable lunch with the combinations shown in Example 1b from the menu shown in Example 1a:

EXAMPLE 1b

- Hamburger on bun and 8 oz apple juice (grain, m/ma, fruit)
- Potato wedges, 1/2 c orange slices, 1/2 c fruit cocktail, flavored milk (vegetable, fruit, milk)
- Turkey sandwich, 1/2 c corn, 1/2 c orange slices, 1/2 c banana, unflavored milk (grain, m/ma, vegetable, fruit, milk)

Other than selecting the required minimum fruit or vegetable serving, the choice to decline a food component is the student's. Schools may not specify other food components a student must select. However, if the lunch menu includes, for example, a combination food such as a slice of pizza that provides three of the five required food components (grains from the crust; vegetables from the sauce and toppings; and m/ma from the cheese), the student may have to select the slice of pizza if not enough additional options are available to select a reimbursable lunch.

Note: Beginning July 1, 2012, SFAs that opt to implement OVS below the senior high school level no longer have authority to require selection of 4 food components for lunch.

Five food components must be offered in at least the daily minimum required serving sizes and must also meet the weekly minimums, if applicable. OVS only applies to daily selections, not available choices over the school week. Except for fluid milk, the food components may be offered in more than one food item. Please note that in the sections on the individual components (fruit, vegetables, m/ma, and grains), information that applies to each of these components is intentionally repeated.

Food Component Requirements for Lunches

Meat/Meat Alternate (M/MA) Component

Students in all grades must be offered at least the daily minimum ounce equivalents (oz eq) of m/ma required in the meal pattern. In addition, there is a range over the school week with a minimum number of oz eq that must be offered. This means that on some days, schools serving Grades K-5 and 6-8 must offer more than the minimum daily amount to meet the weekly minimum requirement.

Grades	Daily Minimum Requirement Offered	Weekly Requirement Offered*
K-5	1 ounce equivalent	8-10 ounce equivalents
6-8	1 ounce equivalent	8-10 ounce equivalents
9-12	2 ounce equivalents	10-12 ounce equivalents

*For School Year 2013-2014, schools are only required to meet the daily and weekly minimum requirements for this food component. See Policy Memorandum [SP 26-2013: Extending Flexibility in the Meat/Meat Alternate and Grains Maximums for School Year 2013-14](#) dated February 25, 2013.

The m/ma component may be offered in a main dish or in a main dish and one other food item as shown in Example 2. All four options offer at least two oz eq of m/ma. However, the beef stew and roast pork options contain all of the m/ma in one food item (main dish), while the other options (peanut butter sandwich plus cheese stick or salad w/chickpeas plus yogurt) split the m/ma component into 2 food items (main dish plus side item).

EXAMPLE 2

M/MA choices at lunch:

- Beef stew (3 oz eq m/ma)
- Roast pork over rice (2 oz eq m/ma)
- Peanut butter sandwich (1.5 oz eq m/ma) and cheese stick (0.75 oz eq m/ma)
- Entree salad w/chickpeas (1 oz eq m/ma) and yogurt (1 oz eq m/ma)

If the m/ma component is offered in two food items, for OVS, the m/ma component is credited if the student selects the required daily minimum for their grade group. This means, using Example 2, that a student in grades K-5 or 6-8 (with a required daily m/ma minimum of 1 oz eq) could select just the peanut butter sandwich with 1.5 oz eq of m/ma (declining the cheese stick). This selection would credit as meeting the m/ma component. However, since the daily minimum m/ma required for grades 9-12 is 2 oz eq, a 10th grader would have to select *both* the peanut butter sandwich and cheese stick (2.25 oz eq total) to credit as meeting the m/ma component.

Similarly, if only the cheese stick (0.75 oz eq m/ma) was selected by a student at any grade level, it cannot be credited as meeting the m/ma component, since it does not meet the daily minimum m/ma required for any age/grade group.

Beans/peas (legumes) may be credited as either m/ma or a vegetable. It is up to the menu planner to determine each day how beans/peas are credited.

Vegetable Component

Students in all grades must be offered daily and weekly minimum servings of vegetables.

Grades	Daily Minimum Requirement Offered	Weekly Minimum Requirement Offered
K-5	¾ cup	3¾ cups
6-8	¾ cup	3¾ cups
9-12	1 cup	5 cups

*Reminder: No more than half of the vegetable offerings may be in the form of juice.

Menu planners may choose to allow students to select more than the daily minimum serving for vegetables as long as the dietary specifications for lunches offered on average over the school week are not exceeded.

The vegetable component consists of a variety of subgroups that must be offered over the week. While there is no requirement that a student select each subgroup, the SFA must ensure that all students have the opportunity to select each of the vegetable subgroups over the week.

To be credited as part of a reimbursable lunch for OVS, the minimum serving a student must select is:

- ½ cup of vegetables, or
- ½ cup fruits, or
- ½ cup total from the fruit and vegetable components (credits as one component), or
- ½ cup of an item with both fruits and vegetables (e.g., a carrot/raisin salad).

Example 3a lists some possible lunch offerings containing vegetables.

EXAMPLE 3a

Food items at lunch containing vegetables:

- Beef stew (contains $\frac{1}{2}$ cup vegetables)
- Seasoned corn ($\frac{1}{2}$ cup vegetables)
- Carrot/raisin salad ($\frac{1}{2}$ cup fruit/vegetable combo)
- Green bean casserole (contains $\frac{1}{4}$ cup vegetables)
- Steamed green peas ($\frac{1}{4}$ cup vegetables)

A student may take two $\frac{1}{4}$ cup servings of either the same or a different vegetable to meet the $\frac{1}{2}$ cup minimum requirement for OVS. The student may also select the same vegetable to meet the required full daily serving.

The *minimum* amount that can be credited toward the vegetable component is $\frac{1}{8}$ cup.

EXAMPLE 3b

Possible vegetable selections meeting minimum $\frac{1}{2}$ cup requirement for OVS:

- Beef stew
- Seasoned corn
- Carrot/raisin salad
- Green bean casserole and steamed green peas
- 2 servings of green bean casserole or 2 servings of steamed green peas

In Example 3b, the beef stew is a main dish that contains the $\frac{1}{2}$ cup of vegetables, while the corn is a side item containing $\frac{1}{2}$ cup of vegetables. The carrot raisin salad is a $\frac{1}{2}$ cup combination of both fruits and vegetables in the same dish. Since the green beans and peas are each $\frac{1}{4}$ cup portions, taking one selection of green beans and one selection of peas meets the $\frac{1}{2}$ cup requirement. Likewise, as noted above, taking two selections of the same vegetable item (such as the green bean casserole) is allowable in order to reach the $\frac{1}{2}$ cup minimum vegetable requirement for OVS.

Beans/peas (legumes) may be credited as either m/ma or vegetable. It is up to the menu planner to determine each day how beans/peas are credited.

If a student does not select at least a $\frac{1}{2}$ cup serving total of fruits and/or vegetables, the lunch is not reimbursable, even if he/she has three other components (e.g., m/ma, grains, milk). Cashiers should allow these students to select fruits or vegetables from the serving line or have these items available at the point

of service. If the student *still* does not select at least a ½ cup serving of fruits and/or vegetables, the meal is not reimbursable. The school may charge the student a la carte prices for the foods selected.

For OVS purposes, if a student can select more than the minimum daily required serving of vegetables (such as from a salad bar), the component is credited only once. For example, if a 10th grade student makes a salad with three cups of vegetables, s/he must still select at least two other components in order to have a reimbursable meal (one of which could be a ½ cup of fruit).

For OVS, if a 9-12 age/grade group student selects only three components and two of these are a fruit and a vegetable, s/he must select the full required serving size for either the fruit or vegetable in order to have both credited as components. In other words, a senior high school student who selects ½ cup of fruit and ½ cup of vegetables and milk does not have a reimbursable meal. Either the fruit or vegetable selection must be one cup to credit it as a full component. Alternately, the student could select a grain or m/ma choice as the third component, instead of more fruits or vegetables.

EXAMPLE 4

Menu for Grades 9-12:

Choose 1: hamburger on bun OR turkey sandwich (2 ounce equivalents of grains, 2 ounce equivalents of m/ma)

Choose up to 2: seasoned corn, green beans, potato wedges (½ cup of vegetables each)

Choose up to 2: orange slices, fruit cocktail, banana, apple juice (½ cup of fruit each)

Choose 1: nonfat unflavored milk OR nonfat flavored milk (1 cup)

*Though these instructions represent the “offered” meal, schools may allow students to select more items as long as the weekly dietary specifications are met.

Using the high school menu in Example 4, a reimbursable lunch for OVS that only contains three components and two of these are fruits and vegetables could be:

- ½ cup seasoned corn and ½ cup green beans (1 cup vegetables total; the full vegetables component); ½ cup orange slices (½ cup fruit-meets ½ cup minimum for OVS); 1 cup unflavored milk (milk component)

OR

- ½ cup green beans (½ cup vegetables meets ½ cup minimum for OVS); two ½ cups orange slices (1 cup fruit total; the full fruit component); 1 cup unflavored milk (milk component).

Fruit Component

Grades	Daily Minimum Requirement Offered	Weekly Minimum Requirement Offered
K-5	½ cup	2 ½ cups
6-8	½ cup	2 ½ cups
9-12	1 cup	5 cups

* Reminder: No more than half of the fruit offerings may be in the form of juice.

Menu planners may allow students to select more than the daily minimum serving for vegetables as long as the dietary specifications for average lunches offered over the school week are not exceeded.

To be credited as a reimbursable lunch for OVS, the minimum serving that a student must select is:

- ½ cup of fruit, or
- ½ cup vegetables, or
- ½ cup total from the fruit and vegetable components (credits as one component), or
- ½ cup of a dish with both fruit and vegetable (e.g., carrot/raisin slaw).

A student may take two ¼ cup servings of either the same or a different fruit to meet the ½ cup minimum requirement for OVS and be credited as the fruit component. The student may also select the same fruit to meet the required full daily serving (e.g., 1 cup for the 9-12 age/grade group).

The *minimum* amount that can be credited toward the fruit component is 1/8 cup.

For OVS purposes, if a student can select more than the minimum daily required serving of fruit (such as from a salad bar), the component is credited only once. For example, if a 5th grade student selects the equivalent of 2 cups of fruit, s/he must still select at least two other components in order to have a reimbursable meal (one of which could be ½ cup of vegetables).

If a student does not select at least a ½ cup serving total of fruits and/or vegetables, the lunch is not reimbursable, even if they have three other components (e.g., m/ma, grains, and milk). Cashiers should allow these students to select fruits or vegetables from the serving line or have these items available at the point of service. If the student *still* does not select at least a ½ cup serving of fruits and/or vegetables, the meal is not reimbursable. The school may charge the student a la carte prices for the foods selected.

For OVS, if a 9-12 age/grade group student selects only three components and two of these are a fruit and a vegetable, s/he must select the full required serving size for either the fruit or vegetable in order to have both credited as components. In other words, a senior high school student who selects ½ cup of fruit and ½ cup of vegetables and milk does not have a reimbursable meal. Either the fruit or vegetable selection

must be one cup to credit it as the third component. Alternately, the student could select a grain or m/ma choice as the third component, instead of more fruits or vegetables.

Grains Component

Grades	Daily Minimum Requirement Offered*	Weekly Requirement Offered*
K-5	1 ounce equivalent	8-9 ounce equivalents
6-8	1 ounce equivalent	8-10 ounce equivalents
9-12	2 ounce equivalents	10-12 ounce equivalents

*For School Year 2013-2014, schools are only required to meet the daily and weekly minimum requirements for this food component. See Policy Memorandum [SP 26-2013: Extending Flexibility in the Meat/Meat Alternate and Grains Maximums for School Year 2013-14](#) dated February 25, 2013.

The grains component is credited for OVS if the total selected equals at least the minimum daily ounce equivalent (oz eq) requirement for the grade group. In addition, there is a range over the school week with a minimum number of oz eq that must be offered. This means that on some days, schools must offer more than the minimum daily amount to meet the weekly requirement.

One-quarter of an ounce equivalent (0.25 oz eq) of a grain serving is the smallest amount that may be credited toward the grains component.

The grains component may be offered in combination with another food component (for example, an entrée with grains and m/ma) or separately (such as a roll or serving of rice), as shown in Example 5. The burrito with chicken and rice option contains all of the grains in one food item (entrée), while the spaghetti with marinara sauce (entrée) and roll (side item) option splits the grains component into two food items. The rice pilaf is a grain item choice that is not part of an entrée.

EXAMPLE 5

Food item choices containing grains:

- Burrito with chicken and brown rice (2.5 oz eq grains total)
- Spaghetti w/marinara sauce (1.5oz eq grains) and whole wheat roll (0.75 oz eq grain) [2.25 oz eq grains total]
- Rice pilaf (1 oz eq grain)
- Oatmeal raisin cookie (1 oz eq grain)

If the grains component is offered in two or more food items, for OVS, the grains component is credited if the student's selection has at least the required daily minimum for their grade group. Therefore, if more than one oz eq of grain is offered in grades K-5 and 6-8 to meet the weekly requirement, for OVS, the student may decline part of this offering and still meet the grains component by taking only one oz eq.

Using Example 5, a student in grades K-5 or 6-8 (minimum daily requirement of 1 oz eq) could select just the spaghetti with marinara sauce (declining the dinner roll). The spaghetti would credit as meeting the grains component. However, since the daily minimum grain required for grades 9-12 is 2 oz eq, a 10th grader must select *both* the spaghetti with marinara sauce and the dinner roll (2.25 oz eq total) to credit as meeting the grains component. Alternatively, the 10th grader could select both the spaghetti (1.5 oz eq) and the cookie (1 oz eq; a total of 2.5 oz eq) to meet the component requirement of 2 oz eq.

Similarly, no student would be able to select just the whole wheat roll (0.75 oz eq), decline the spaghetti with marinara sauce, and credit as meeting the grains component. This is because it does not meet the daily minimum grains required for any age/grade group. The student would have to select other food items containing grains to receive credit for the grains component.

Up to 2 oz eq of grain-based desserts may be credited towards the grains component per week. For OVS, if the student selects a grain-based dessert which meets the applicable daily minimum requirement, it is creditable for this component. Therefore, since the oatmeal raisin cookie in Example 5 is 1 oz eq, it could credit as meeting the daily required serving for the grains component for grades K-5 and 6-8 (but not grades 9-12).

Milk Component

For all grade groups, one cup of fluid milk must be offered daily as a beverage.

The weekly minimum amount of five cups of milk may be met by offering the daily minimum of one cup. There is also a daily requirement to offer a variety of milk choices (at least two within the required types); however, this is unrelated to OVS. For this component to be credited for OVS, the student must select at least one cup of fluid milk of any type offered.

Implementing OVS at Breakfast

Overview of Menu Planning/OVS Changes in Breakfast

Function	Before HHFKA*	After HHFKA
Implementation of OVS	<i>Optional at all levels</i>	No Change
Reimbursable Meals Number of Food Components/Food Items	Reimbursable breakfasts must offer three or four components in four food items	Three components in four food items
Required number of selections for OVS	One food item may be declined	Student must select at least three food items Beginning in School Year 2014-2015, one selection must be at least ½ cup of fruit
OVS and fruit and vegetable food components/food items	One component (juice, fruit, vegetable); one food item offered For OVS, no requirement to select the component	For School Year 2013-2014, no change Beginning in School Year 2014-2015: component is fruit and for OVS, one selection must be at least ½ cup of fruit
Extra foods offered	Not credited for OVS	No change
Double servings of components/food items	<i>Allowed for only grains and meat/meat alternate component</i>	Allowed for fruit component and for grains component and credited meat/meat alternate when substituted for grains

* Comparison only for food-based menu planning

Definitions

SBP

A food component is one of three food groups that comprise reimbursable breakfasts. These are grains (with optional meats/meat alternates allowed); juice/fruit/vegetable; and milk. Schools must always offer all three food components in at least the minimum required amounts.

A food item is a specific food offered within the three food components. At least three food items must be offered if there is no OVS. For the purposes of OVS, a school must offer at least four food items comprised of the three components and students must select at least three food items for a reimbursable breakfast.

The food items selected may be from any of the required components and must be in the required minimum servings (discussed below for each food component). Depending on the planned menu, the student may need to select more than one food item in order to have an adequate amount for a component to be credited for OVS.

NOTE: For the SBP in School Year 2013-2014, students are *not* required to take a minimum of ½ cup of fruit or vegetables for OVS.

Use of OVS in the SBP

OVS is optional at all grade levels.

The Basics

The meal pattern for breakfasts consists of three food components:

- Juice/Fruit/Vegetable¹
- Grains
- Meats/meat alternates optional
- Milk

¹ For School Year 2013-2014, the juice/fruit/vegetable component remains and the required serving size for this component is ½ cup at all grade levels.

The age/grade groups for breakfasts are:

- K-5
- 6-8 and
- 9-12.

Menu Planning

A food component is one of three food groups that comprise reimbursable breakfasts. In School Year 2013-14, these are grains (with optional meat/meat alternate allowed); juice/fruit/vegetable; and milk.

A food item is a specific food offered within the three food components. If a school does not operate under OVS, at least three food items from the food components must be offered in at least the daily minimum required serving sizes. And on some days, more than the daily minimum amounts must be offered to meet any applicable weekly minimums.

OVS Menu Planning

In order to participate in OVS, a school must offer at least four food items. The school should ensure that students select at least three food items.

If a school operates breakfast under OVS:

- At least four food items from the food components must be offered; and
- All students, at any grade level, must select at least three food items in the applicable minimum required serving size.²
- OVS only applies to daily selections that meet the required servings for the food items offered for that day.

Because students are not yet required in School Year 2013-2014 to take fruit for breakfast under OVS, a reimbursable meal may contain only grains and milk.

For example, the school may offer one oz eq toast, one oz eq cereal; one ½ cup serving of juice and 8 ounces of milk as the four food items. Under OVS, the student could select the two grain food items offered (toast and cereal) and the milk for a reimbursable breakfast.

While the choice to decline a food item (including the fruit component for School Year 2013-2014) is the student's, the menu planner determines how to offer food items. The way food items are offered may affect the selections the student takes in order to have a reimbursable breakfast under OVS. For example,

² For School Year 2013-2014, for OVS purposes, students are not required to select the juice/fruit/vegetable component.

the menu may offer a combination food that contains more than one food item which cannot be separated, such as a pre-plated waffle with fresh fruit topping already applied. If the student only wanted the waffle, s/he would not be able to decline the fruit, even if s/he did not intend to consume it.

Again, if *choices* of food items within the components are offered, the menu must indicate what choices or combination of choices the student may select. This is not an aspect of OVS; it is indicating to the students what they may select.

Combination Foods (more than one component)

Example 6 below shows a menu with an option that consists of two food items from different food components. This sample menu could be offered to all grade levels. If the student selects the waffle with fruit (a combination food that provides the daily minimum for the grains component of 1 oz eq and the daily minimum for the juice/fruit/vegetable component of ½ cup for School Year 2013-2014), and milk, s/he has a reimbursable breakfast for OVS. These selections equal three food items for the SBP. A student would also have a reimbursable breakfast for OVS if one slice of toast, the orange slices and the milk were selected. Other possible combinations that comprise a reimbursable meal include: waffle with fruit and orange slices; 2 slices of toast and oranges; and 2 slices of toast and milk.

EXAMPLE 6

Menu offering 4 food items with a choice of a combination food with 2 different components:

- Waffle with fruit (1 oz eq grain + ½ cup fruit) [2 food items]

OR

- 2 slices of toast (2 oz eq grains) [2 food items]
- Orange slices (½ cup fruit) [1 food item]
- Variety of milk (1 cup) [1 food item]

Another popular combination food offered at breakfast is a smoothie made from fruit and milk. If there is at least 1 cup of milk and at least ½ cup of fruit/juice in the smoothie, the smoothie may count as 2 food items for purposes of OVS. A student would need to select one additional food item in order to have 3 total items and a reimbursable meal. Please refer to Policy Memo [SP 36-2012, CACFP 17-2012, SFSP 13-2012: Smoothies Offered in Child Nutrition Programs](#) (July 11, 2012) for additional information.

Food Component/Food Item Requirements for Breakfasts

Please note that in the juice/fruit/vegetable and grains component sections, information that applies to each of these components is intentionally repeated.

Grains Component

Grades	Daily Minimum Requirement Offered*	Weekly Requirement Offered*
K-5	1 ounce equivalent	7-10 ounce equivalents
6-8	1 ounce equivalent	8-10 ounce equivalents
9-12	1 ounce equivalent	9-10 ounce equivalents

* For School Year 2013-2014, schools are only required to meet the daily and weekly minimum requirements for this food component. See Policy Memorandum [SP 26-2013: Extending Flexibility in the Meat/Meat Alternate and Grains Maximums for School Year 2013-14](#) dated February 25, 2013.

A grains component selection may be credited as a food item for OVS if the total selected equals at least the minimum daily ounce equivalent (oz eq) requirement for the age/grade group. In addition, there is a range over the school week with a minimum number of oz eq that must be offered. This means that on some days schools must offer more than the minimum daily amount to meet the minimum weekly requirement.

EXAMPLE 7

Menu with four food items:

- Slice of toast (1 oz eq grain) [1 grain item]
- Whole grain-rich cereal (1 oz eq grain) [1 grain item]
- Orange slices (½ cup fruit) [1 fruit/vegetable item]
- Variety of milk (1 cup) [1 milk item]

Using the menu in Example 7, a reimbursable breakfast could consist of: toast, orange slices, and milk. A student does not have to take both grain food items offered (cereal and toast) since each item is a 1 oz eq and provides the minimum required daily serving.

One-quarter of an ounce equivalent (0.25 oz eq) of a grain serving is the smallest amount that may be credited toward the grains component. In School Year 2013-2014, one-half of the grain offerings over the course of the week must be whole grain-rich.

The menu planner may offer the grains component in one or more different food items. If offered in two or more food items, food service staff and students, through training and signage, must know what choices constitute a reimbursable breakfast for OVS. In addition, the menu planner determines how many foods must be selected in order to credit as a grains food item.

For example, the menu planner has the discretion to offer a 2 oz eq. muffin as one or two food items. For OVS, if the menu planner offers this as one food item, the student must select two additional food items; if offered as two food items, the student would only need one additional food item. If the student selects three other food items, the student can decline the muffin.

EXAMPLE 8

Menu with five food items:

- Whole grain-rich muffin (2 oz eq grain) [2 grain items]

AND

- Whole grain-rich cereal (1 oz eq grain) [1 grain item]
- Orange slices (½ cup fruit) [1 fruit/vegetable item]
- Variety of milk (1 cup) [1 milk item]

Using the menu in Example 8 above, the following selections are reimbursable:

- Whole grain-rich muffin, orange slices
- Whole grain-rich muffin, milk
- Whole grain-rich cereal, orange slices, milk

Meat/Meat Alternate (M/MA) Offered in Place of the Grains Component

While there is no separate requirement to offer the m/ma component in the new SBP meal pattern, menu planners have two options for including m/ma in breakfasts. Schools may offer³ the m/ma in place of the grains component *after* the minimum daily grains requirement (1 oz eq for all age/grade groups) is provided in the planned breakfast. Under this option, the student does not have to select the grains item in order for the m/ma to credit as a food item on the student's tray.

One oz eq of m/ma may count as one oz eq of grains for purposes of meeting the weekly grains component requirement. (Note: This is similar, though not identical, to previous practices for crediting m/ma and grains in SBP)

³ The m/ma substitution option may be used beginning School Year 2013-2014 (starting July 1, 2013).

Alternately, a school may offer m/ma as an additional food and not credit it toward any component. Both options are described below.

Example 9 shows a menu with the m/ma offered as one of the food items for the grains component. In this example, for the purposes of OVS, the student does not have to select both the cereal and the hard-boiled egg in order to have the m/ma item credited. If s/he selects only the hard-boiled egg, orange slices, and milk, this is considered three food items. The cereal is considered the declined item.

EXAMPLE 9		
Menu with four food items:		
• Whole grain-rich cereal (1 oz eq grain)		[1 grain item]
• Hard-boiled egg (1 oz eq credited as grain)		[1 grain item]
• Orange slices (½ cup fruit)		[1 fruit/vegetable item]
• Variety of milk (1 cup)		[1 milk item]

Since beans/peas (legumes) may be credited as m/ma, they may also be credited toward the grains component at breakfast- provided that at least one oz eq of grains is also offered that day as part of a reimbursable breakfast. If credited in this way, beans/peas may not also be credited toward meeting the juice/fruit/vegetable component in the same meal.

Under OVS, the menu planner may choose to allow students to select two of the same grain or m/ma items and count them as two food items. While the menu may indicate each offering as two different food items, if each provides at least one oz eq of grain, the student has two creditable food items under the grains component whether s/he selects the two different food items or two of the same food item. In Example 9, the student could select two servings of cereal and a milk under OVS and have three food items (since fruit is not required to be selected in School Year 2013-2014).

M/MA as “Additional” Food

Beginning in School Year 2013-2014, menu planners have the option of offering m/ma as additional food and not credit it toward any of the food components or count as a food item. If used as an additional food, the m/ma is not credited for the daily or weekly grains component requirement, but must still be counted toward the weekly dietary specifications. Additionally, the m/ma cannot be counted as food items for purposes of OVS. Therefore, four food items, in addition to an additional m/ma food, must be offered in order to have OVS. If the menu planner opts to offer an m/ma as an additional food, staff and students must be aware that selection of this additional food is not counted for OVS purposes and that three other food items must be selected.

As Example 10 shows, the student may decline one food item and the m/ma and still have a reimbursable breakfast in School Year 2013-2014. In this situation, the hard-boiled egg is being offered as an additional food and may not be credited toward the grains component. Because of this, the offered menu contains only one oz eq of creditable grains (the toast). There are only four items for purposes of OVS: toast, oranges, apple juice, and milk, and a student may decline one of these. Taking or declining the egg, since it is an additional food, may not be counted as a food item for OVS.

EXAMPLE 10

Menu with 4 food items with m/ma offered as an additional food:

- Slice of toast (1 oz eq grain) [1 grain item]
- Hard-boiled egg (“additional” food)
- Orange slices (½ cup fruit) [1 fruit/vegetable item]
- Apple juice (½ cup fruit) [1 fruit/vegetable item]
- Variety of milk (1 cup) [1 milk item]

Juice/Fruit/Vegetable Component for School Year 2013-2014 ONLY

Grades	Daily Minimum Requirement Offered
K-5	½ cup
6-8	½ cup
9-12	½ cup

Menu planners may allow students to select more than the daily minimum serving for this component as long as the weekly dietary specifications, including calories, are not exceeded.

In School Year 2013-2014, there are no changes to the juice/fruit/vegetable component in breakfast. Therefore, schools must continue to offer at least ½ cup of fruits or vegetables (or juice) daily and the component continues as fruits/vegetables combined.

The menu planner may offer fruits/vegetables as one or more food items in order to meet the required number of food items needed for OVS. For example, several ½ cup servings of fruits or vegetables could be offered as shown in Example 11, below.

EXAMPLE 11

Menu with five food items:

- Slice of toast (1 oz eq grain) [1 grain item]
- Whole grain cereal (1 oz eq grain) [1 grain item]
- Tomato juice (½ cup fruit) [1 fruit/vegetable item]
- Apple slices (½ cup fruit) [1 fruit/vegetable item]
- Variety of milk (1 cup) [1 milk item]

In the menu offered in Example 11, there are two juice/fruit/vegetable items offered, and a student could select any three of the five items. Therefore, a breakfast containing toast, cereal, tomato juice, and apple slices would be reimbursable (only one item, the milk, was declined). A breakfast containing toast, tomato juice, and apple slices would also be reimbursable (*three* items selected).

To be counted as a food item for a reimbursable breakfast for OVS, the juice/ fruit/vegetable component can be offered in the following ways:

- ½ cup total of fruit, or
- ½ cup total of vegetables, or
- ½ cup total of fruit and vegetable, or
- ½ cup of a dish with both fruit and vegetable.

EXAMPLE 12a

Breakfast food items at containing fruits and/or vegetables:

Egg frittata (with ¼ cup vegetable)

8 oz 100% orange juice (1 cup fruit)

Mango/Black Bean Salsa (¼ cup fruit/vegetable combo)

Diced pineapple (¼ cup fruit)

The minimum amount that may be credited towards the juice/fruit/vegetable component is 1/8 cup. Therefore, the menu planner may choose to offer amounts of less than ½ cup of this component across multiple foods as long as at least ½ cup total of fruits and/or vegetables is offered on the menu. One-half cup of juice/fruit/vegetable total must be selected to count as one food item for purposes of OVS. As shown in Example 12a above, a menu could include different quarter cup servings of fruits and/or vegetables that may be selected to meet the half cup serving requirement for this component.

A student may take two ¼ cup servings of either the same or a different fruit or vegetable to meet the ½ cup juice/fruit/vegetable component requirement for OVS.

EXAMPLE 12b

Fruit/vegetable selections with $\frac{1}{2}$ cup component requirement:

- Egg frittata and mango/black bean salsa (two $\frac{1}{8}$ cups vegetable)
- Orange juice (1 cup fruit)
- Diced pineapple and apple slices (two $\frac{1}{4}$ cups fruit)
- 2 servings of apple slices (two $\frac{1}{4}$ cups fruit)

Using Example 12b, a student could select two servings of apple slices ($\frac{1}{4}$ cup fruit plus $\frac{1}{4}$ cup fruit) or the egg frittata with salsa ($\frac{1}{8}$ cup vegetable plus $\frac{1}{8}$ cup vegetable) and a serving of apple slices ($\frac{1}{4}$ cup fruit) to make $\frac{1}{2}$ cup total of juice/fruit/vegetable and count as a food item for OVS.

Milk Component

For all grade groups, one cup of fluid milk must be offered daily. It may be used as a beverage, on cereal, or used in part for each purpose. The weekly minimum amount of five cups of milk may be met by offering the daily minimum of one cup. There is also a daily requirement to offer a variety of milk choices (at least two choices), however this is unrelated to OVS. For this component to be credited for OVS, the student must select at least one cup of fluid milk, of any type.

Questions and Answers

1. How should the serving lines be set-up to assist students with making the correct choices for OVS at lunch?

Although all the foods that are a part of the reimbursable meal do not have to be adjacent to each other, they must be labeled, listed, or otherwise identified near or at the beginning of the serving line so the students can easily choose all the food components/food items for a reimbursable meal. If some of the food components/food items offered in reimbursable meals (such as the fruits and vegetables) are offered beyond the point of service, the school must ensure that students are aware that every reimbursable meal must include at least ½ cup of a fruit and/or fruit vegetables.

2. Must the menu choices be offered at the point of service or can SFAs with caterers have students place order in the morning?

As long as the menu follows the requirements, this type of virtual cafeteria line is an acceptable practice, since the student is given choices at some point. A hybrid model would also be acceptable, in which the students choose their entrée in the morning and the sides are chosen at the POS.

3. We have an advance online ordering system that provides choices. The vendor then bags up the choices and delivers them to schools daily. Is this acceptable for OVS?

Yes; there is no OVS requirement that the student must be able to make her or his OVS selections on the serving line. However, the online ordering must be carefully structured and the resulting meals be checked to assure that reimbursable meals are provided. And for OVS, it must be clear to the student and her/his parents what the requirements are for a reimbursable meal.

4. Since a ½ cup of fruit or vegetable is required under OVS for lunch, how can schools handle situations when a student refuses to take a fruit or vegetable at lunch?

Our goal is for schools to provide each student a complete, reimbursable meal daily. To help accomplish this goal, schools are required to identify the content of the daily reimbursable meal(s). If a student refuses to take the required components/items, his/her meal is not reimbursable and the school/SFA has discretion in how to handle the situation. The school/SFA must have a policy in place regarding a student's selection of incomplete meals, and notify parents/households about such policy. If the school's policy is not to serve non-reimbursable meals and not to offer other food options, this policy must be communicated to students and parents in advance. The following are options for the school/SFA:

- Offer the foods for purchase a la carte and any student who has the money either in hand or in his/her account may purchase food a la carte, or
- Allow the child to take the food for free and not claim it for reimbursement.

5. Can a student meet the OVS 1/2 cup requirement for fruit or vegetable by selecting ¼ cup fruit and 1/4 cup vegetable?

Yes. Although fruits and vegetables are separate components in the meal patterns, the OVS requirement to select at least ½ cup of fruits or vegetables daily for a reimbursable meal may be met if the student selects ¼ cup of fruits and ¼ vegetables. This is another way to promote the consumption of fruits and vegetables among children. The student would not be required to select additional fruits or vegetables if the reimbursable meal under OVS includes two other components in full.

6. What must schools do to comply with the requirement to identify reimbursable meal(s)?

The requirement for SFAs to identify, near or at the beginning of the serving line, the food items that constitute a reimbursable meal is intended to assist students in selecting the meal components that comprise the meal and in the appropriate quantities. The final rule, however, does not set specific requirements. State agencies and SFAs may establish requirements to fit their menu, facilities, layout and other considerations. Providing detailed information about the components, such as identifying the vegetable subgroups, is an excellent teaching tool, but is not required. Although all the foods that are a part of the reimbursable meal do not have to be adjacent to each other, they must be labeled, listed, or otherwise identified near or at the beginning of the serving line so the students can easily choose all the components for a reimbursable meal. If some of the components of the reimbursable meal (such as the fruits and vegetables) are offered beyond the point of service, the school must ensure that students are aware that every reimbursable meal at lunch must include a fruit or a vegetable, and that the total of any fruit or vegetable item selected under OVS must equal at least 1/2 cup.

For examples of innovative and practical signage ideas submitted by SFAs and States, please refer to the [Best Practices Sharing Center](#) website.

7. Can pre-bagged meals be offered when breakfast is offered in the classroom and OVS is in place?

Yes. If a school participates in OVS at breakfast and offers breakfasts where some or all of the components are bundled together, the operator should attempt to the extent possible to offer choices (such as a fruit basket) aside from the pre-bagged items. However, there is no requirement that all possible combinations of choices be made available to the student.