

STATE OF CONNECTICUT DEPARTMENT OF EDUCATION



TO: Sponsors of the National School Lunch Program

FROM: John D. Frassinelli, Bureau Chief

Bureau of Health/Nutrition, Family Services and Adult Education

DATE: August 5, 2019

SUBJECT: Operational Memorandum No. 11-19:

Weekly Whole Grain-rich (WGR) Requirement for the National School Lunch Program (NSLP) and School Breakfast Program (SBP) Meal Patterns for Grades

K-12

This memorandum provides guidance on the new weekly whole grain-rich (WGR) requirement for the U.S. Department of Agriculture's (USDA) NSLP and SBP meal patterns for grades K-12, including the Seamless Summer Option (SSO) of the NSLP. It also includes resources to assist school food authorities (SFAs) with meal pattern compliance for the grains component. As a reminder, resources and guidance on the meal patterns and crediting requirements are available on the Connecticut State Department of Education's (CSDE) Meal Patterns for Grades K-12 in School Nutrition Programs and Crediting Foods for Grades K-12 in School Nutrition Programs webpages. The CSDE's *Menu Planning Guide for School Meals for Grades K-12* contains comprehensive information and guidance on meeting the meal pattern requirements.

New Weekly WGR Requirement

Effective July 1, 2019, the USDA's final rule, *Child Nutrition Programs: Flexibilities for Milk, Whole Grains, and Sodium Requirements*, requires that **at least half** (50 percent) of the weekly grains offered at lunch and breakfast for grades K-12 must be WGR. Grains that are not WGR must be enriched. For guidance on how to identify enriched grains, see the CSDE's handout, *Crediting Enriched Grains in the NSLP and SBP*.

Previously, the NSLP and SBP meal patterns for grades K-12 required that all grains were WGR. The CSDE strongly encourages SFAs to continue to serve only WGR grains, and offer 100 percent whole grains most often. This provides the best nutrition for children.

Documentation for Weekly WGR Requirement

SFAs that choose to offer enriched grains in school meals must document that at least half of the weekly grains offered at lunch and breakfast are WGR. SFAs must maintain this documentation on file for the Administrative Review of school nutrition programs. SFAs may choose to calculate the menu's percentage of WGR grains using the CSDE's new Excel worksheet, *Calculating Weekly Percentage of Whole Grain-rich Menu Items in the NSLP and SBP*. This worksheet is available under the "Grains Component" section of the CSDE's Crediting Foods in School Nutrition Programs webpage.

Steps for Calculating the Weekly Percentage of WGR Menu Items

The determination of whether a weekly menu offers at least 50 percent WGR grains is based on the total ounce equivalents for **all grain items offered** with **all menu choices** during the week. The calculation steps are summarized below. SFAs must calculate the weekly percentage of WGR menu items separately for lunch and breakfast.

- 1. Determine the **total ounce equivalents of all creditable grain menu items (WGR and enriched)** offered during the week by adding the ounce equivalents for each grain menu item for all daily meal choices. For example, if Monday's lunch menu offers three daily grain choices (1½ ounce equivalents of a whole-wheat roll, 2 ounce equivalents of brown rice, and 1 ounce equivalent of enriched crackers), the daily total is 4½ ounce equivalents.
 - SFAs must determine ounce equivalents using either 1) the appropriate grain group in the USDA's ounce equivalent chart; or 2) the creditable grains per serving, based on the manufacturer's product formulation statement (PFS) for commercial foods or the SFA's standardized recipe for foods made on site. There are some situations when SFAs must obtain a PFS and use the creditable grains method for commercial products, instead of the USDA's ounce equivalent chart. For more information, see the CSDE's handout, *Calculation Methods for Grain Ounce Equivalents for Grades K-12 in the NSLP and SBP*. **Note:** SFAs are not required to use either crediting method if a product has a Child Nutrition (CN) label. CN-labeled products credit based on the stated crediting information for grain ounce equivalents.
 - For each grain item in the weekly menu, SFAs must maintain documentation on file to demonstrate the ounce equivalents contribution and whether the grain item is WGR. This includes Nutrition Facts labels and ingredients for all commercial grain products, or CN labels (if the grain is part of a meat/meat alternate product), and standardized recipes for foods made on site. In some situations, SFAs might need to obtain a manufacturer's PFS to document a product's creditable grains. For guidance on these situations, see the CSDE's handout, *Calculation Methods for Grain Ounce Equivalents for Grades K-12 in the NSLP and SBP*. For resources on CN labels, PFS forms, and standardized recipes, see "Resources" on page 6.
- 2. Determine the **total ounce equivalents of all WGR menu items** offered during the week by adding the ounce equivalents for each WGR grain menu item for all daily meal choices. For example, if Monday's lunch menu offers three daily grain choices (1½ ounce equivalents of a whole-wheat roll, 2 ounce equivalents of brown rice, and 1 ounce equivalent of enriched crackers), the daily WGR total is 3½ ounce equivalents.
- 3. Determine the percentage of WGR grains offered during the week. Divide the total ounce equivalents of all WGR grain menu items (from step 2) by the total ounce equivalents of all grain menu items (from step 1); then multiply by 100.

Table 1 shows a sample calculation of the weekly percentage of WGR menu items. The weekly menu provides 38 ounce equivalents from all grain menu items, including 30 ounce equivalents of WGR menu items and 8 ounce equivalents of enriched menu items. This menu meets the weekly WGR requirement because 78.9 percent of all offered weekly grains are WGR.

| | Table 1. Steps for calculating the weekly percentage of WGR menu items | | | | | | |
|----|---|--|-------------------------------------|--|--|--|--|
| 1. | List the total ounce equivalents of all creditable grain menu items (WGR and enriched) offered during the week. | | | | | | |
| | Add the ounce equivalents for each grain menu item for all daily meal choices. | 38 | Total grains (ounce equivalents) | | | | |
| 2. | List the total ounce equivalents of all WGR menu items of | GR menu items offered during the week. | | | | | |
| | • Add the ounce equivalents for each WGR grain menu item for all daily meal choices | 30 | WGR grains (ounce equivalents) | | | | |
| 3. | Calculate the percentage of WGR grain items for the week | ly men | u. | | | | |
| | • Divide A (step 1) by B (step 2). | 0.789 | | | | | |
| | • Multiply C by 100. | 78.9 | Percent WGR | | | | |
| 4. | Is D at least 50 percent? If "yes," at least half of the weekly grains offered are WG | R. | ☑ Yes □ No | | | | |

Percentage of Weekly WGR Menu Items versus Weekly Grains Requirement

It is important to note that the calculation of the percentage of weekly WGR menu items is different from the calculation of the minimum weekly meal pattern requirements for grains for each grade group. For example, for grades 6-8, SFAs must offer at least 8 ounce equivalents of grains per week. If a menu offers multiple daily grain choices, the menu planner must use the daily grain choice with the **smallest** ounce equivalents when determining if the menu meets the weekly grains requirement. For example, if the lunch menu offers two daily grain choices that include 1½ ounce equivalents of a WGR item and 2 ounce equivalents of a WGR item, the menu planner must count the WGR item with 1½ ounce equivalents toward the weekly grain requirements.

However, when determining the percentage of weekly WGR menu items, the menu planner must add the ounce equivalents for **all** daily grain choices. In the example above, the two daily grain items (1½ ounce equivalents of a WGR item and 2 ounce equivalents of a WGR item) provide a total of 3½ ounce equivalents. The menu planner would add this daily total to the totals for all other days in the week to determine the weekly ounce equivalents of grain menu items and the percentage of WGR menu items offered to students.

Table 2 shows an example of how to calculate the total weekly ounce equivalents of grains for a lunch menu for grades 6-8.

Table 2. Sample calculation of total weekly grain ounce equivalents for grades 6-8

The lunch meal pattern for grades 6-8 requires at least 1 ounce equivalent of grains per day and 8 ounce equivalents of grains per week. This menu meets the meal pattern requirements because each daily grain choice provides at least 1 ounce equivalent and the weekly menu provides 9 ounce equivalents (based on the smallest grain choice offered each day). ¹ This menu meets the weekly WGR requirement because it offers 20 ounce equivalents of grain items during the week, of which 12.5 ounce equivalents (62.5 percent) are WGR.

| Grain items | Serving size (amount) | Grain group ² | Ounce equivalents | | | | |
|------------------------------------|-------------------------|-----------------------------|-------------------|----------|--|--|--|
| (all menu choices) | | | WGR | Enriched | | | |
| Day 1 | | | | | | | |
| Whole-wheat bread | 2 slices | В | 2 | 0 | | | |
| Pasta, WGR | 1 cup | Н | 2 | 0 | | | |
| Day 2 | | | | | | | |
| Dinner roll, whole wheat | 2 ounces | В | 2 | 0 | | | |
| Brown rice | 1 cup | Н | 2 | 0 | | | |
| Day 3 | | | | | | | |
| WGR breading on chicken nuggets | 0.8 ounce | A | 1 | 0 | | | |
| WGR crackers | 4 crackers (1.2 ounces) | A | 1.5 | 0 | | | |
| Day 4 | | | | | | | |
| Cornbread, enriched, school recipe | 3 ounces | С | 0 | 2.5 | | | |
| Croutons, enriched | 1.6 ounces | A | 2 | 0 | | | |
| Day 5 | | | | | | | |
| Pizza crust, enriched | 3 ounces | В | 0 | 3 | | | |
| Hamburger bun, enriched | 2 ounces | В | 0 | 2 | | | |
| Tota | 12.5 | 7.5 | | | | | |
| | 62.5% | 37.5% | | | | | |

¹ The NSLP and SBP meal patterns require minimum weekly amounts of the grains component for each grade group. When menus offer a choice of more than one grain item on an individual day, the menu planner must use the daily grain item with the smallest ounce equivalents when calculating the weekly grain requirements.

² The grain group is from the USDA's ounce equivalents chart. For more information, see the CSDE's handout, *Grain Ounce Equivalents for Grades K-12 in the NSLP and SBP*.

The "Total ounce equivalents per week" includes all grain items. This calculation is different from the minimum weekly meal pattern grain requirements for each grade group. For more information, see "Percentage of Weekly WGR Menu Items versus Weekly Grains Requirement" on page 3.

Resources

The resources below assist SFAs with meeting the requirements for the grains component in the NSLP and SBP meal patterns for grades K-12.

Accepting Processed Product Documentation (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/AcceptDoc.pdf

Calculating Weekly Percentage of Whole Grain-rich Menu Items in the NSLP and SBP (CSDE): https://portal.ct.gov/-

/media/SDE/Nutrition/NSLP/Crediting/PercentageWGRCalculation.xlsx

Calculation Methods for Whole Grain-Rich Ounce Equivalent for Grades K-12 in the NSLP and SBP (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/GrainCalc.pdf

Child Nutrition (CN) Labeling Program (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/CNlabel.pdf

Comparison of Meal Pattern Requirements for the Grains Component in the School Nutrition Programs (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/ComparisonGrainCrediting.pdf

Crediting Breakfast Cereals for Grades K-12 in the NSLP and SBP (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/CreditCereals.pdf

Crediting Enriched Grains in the NSLP and SBP (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/CreditEnrichedGrains.pdf

Crediting Foods in School Nutrition Programs (CSDE webpage):

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

Crediting Whole Grains in the NSLP and SBP (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/CreditWholeGrains.pdf

Food Buying Guide for Child Nutrition Programs (USDA):

https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs

Grain Ounce Equivalents for Grades K-12 in the NSLP and SBP (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/Grainsozeq.pdf

Menu Planner for School Meals (USDA):

https://www.fns.usda.gov/tn/menu-planner

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

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

Product Formulation Statement for Grains (USDA):

https://www.fns.usda.gov/sites/default/files/resource-files/PFSgrains13-14.pdf

Product Formulation Statement for Grains: Completed Sample (USDA):

https://www.fns.usda.gov/sites/default/files/resource-files/PFSsamplegrains.pdf

Product Formulation Statements (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/PFS.pdf

Standardized Recipe Form (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/StdRecipeSchools.doc

Whole Grain Resource for the National School Lunch and School Breakfast Programs: https://www.fns.usda.gov/tn/whole-grain-resource-national-school-lunch-and-school-breakfast-programs-0

Whole Grain-rich Criteria for Grades K-12 in the NSLP and SBP (CSDE): https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/WGRCriteria.pdf

Yield Study Form (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/YieldStudy.pdf

Questions may be directed to your school nutrition consultant.

| Consultants for School Nutrition Programs | | | | | |
|--|---|--|--|--|--|
| County | Consultant | | | | |
| Fairfield County (Includes Region 9) Litchfield County (Includes Regions 1, 6, 7, 12, and 14) | Fionnuala Brown fionnuala.brown@ct.gov 860-807-2129 | | | | |
| Hartford County (Includes Region 10) Middlesex County (Includes Regions 4, 13, and 17) | Teri Dandeneau teri.dandeneau@ct.gov 860-807-2079 | | | | |
| New Haven County (Includes Regions 5, 15, and 16) | Jackie Schipke jackie.schipke@ct.gov 860-807-2123 | | | | |
| New London County Tolland County (Includes Regions 8 and 19) Windham County (Includes Region 11) | Susan Alston susan.alston@ct.gov 860-807-2081 | | | | |

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Important: This is a numbered Connecticut State Department of Education (CSDE) operational memorandum that contains important program information. Please read carefully and retain for future reference. All CSDE operational memoranda are posted on the CSDE's Operational Memoranda for School Nutrition Programs webpage.