

# Pre-Kindergarten (Pre-K) Meal Pattern

## For the School Nutrition Program (SNP) Operators

Contracting Entities (CEs) that operate the National School Lunch Program (NSLP) and/or the School Breakfast Program (SBP) must use Child and Adult Center Food Program (CACFP) pre-kindergarten (pre-K) meal pattern when serving students 4 and 5 years who are not enrolled in kindergarten (pre-kindergarten) beginning October 1, 2017. CEs may implement the pre-K meal pattern at the beginning of School Year (SY) 2017-2018. If a CE chooses to implement the pre-K meal pattern at the beginning of the SY, the CE must document implementation in food production records and menus as appropriate.

*[NOTE: CEs are required to implement the updated CACFP pre-K meal pattern for SBP pre-K students beginning on October 1, 2017, but other CACFP operational requirements do not apply to NSLP or SBP sites.]*

The guidance in this section provides an overview of the pre-K meal pattern. For detailed guidance on the pre-K meal pattern, CEs should use the *Child and Adult Care Food Program—Child Care Centers Handbook* which is available at [www.squaremeals.org](http://www.squaremeals.org).

USDA will be incorporating the information from the *Food Buying Guide for School Nutrition Programs* into an updated *Food Buying Guide for Child Nutrition Programs* to provide more standardized portion size information. The updated guide will address both the pre-K and NSLP/SBP meal patterns in the same guide.

### Definitions for This Section

For this section, the following definitions provide information that may assist CEs in determining eligibility:

<i>Enriched</i>	Product conforms to the Food and Drug Administration’s Standard of Identity for levels of iron, thiamin, riboflavin, and niacin. The terms enriched means nutrients that were lost during food processing have been added back into the product, such as adding back certain vitamins lost in processing wheat to make white flour.
<i>Juice</i>	Undiluted product obtained by extraction from sound fruit. <sup>1</sup> It may be fresh, canned, frozen, or reconstituted from concentrate and may be served in either liquid or frozen state. Diluted juice is no longer allowed.
<i>Sound Fruit</i>	Product made from 100% fruit.

<sup>1</sup> In this definition, *sound fruit* means a product made from 100% fruit.

<i>Tofu</i>	Soybean-derived food that is made by a process in which soybeans are soaked, ground, mixed with water, heated, filtered, coagulated, and formed into cakes. Basic ingredients are whole soybeans, one or more food-grade coagulants (typically a salt or an acid), and water.
<i>Whole Grain</i>	Edible part of wheat, corn, rice, oats, rye, barley, etc. Parts of the grains such as the germ or the bran are not considered whole-grain. Whole-grain flour or meal is the product derived by grinding the entire grain minus the husk/hull. If a flour or meal does not contain all edible parts of the grain, it is not whole-grain.
<i>Whole Grain-Rich</i>	Grain products containing at least 50 percent whole grains and enriched grains for the remaining amount.

## Milk Food Component

### Fat Content

- One year olds must be served whole milk.
- Two year olds and older must be served low-fat or fat-free unflavored milk.

### Non-Dairy Beverages

- Non-dairy fluid milk substitutes that meet the dietary specifications for a milk substitute may be served to students if the CE provides the same substitute to all students in accordance with CE policy.<sup>2</sup>
- Other beverages, including water, cannot be offered in place of milk as part of the reimbursable meal or snack.

## Fruit and Vegetable Components

### Breakfast

- Fruit and vegetables are one component at breakfast.

### Lunch, Supper, and Snack

- Fruit and vegetables are two separate components at lunch, supper, and snack.
- Two vegetables may be served in place of a fruit component and a vegetable component. If two vegetable servings are offered, two different vegetables must be served.
- Food items that are mixtures of fruit and vegetables may credit for the fruit component as long as the fruit portion size is creditable ( $\frac{1}{8}$  cup or more) and for the vegetable component as long as the vegetable portion size is creditable ( $\frac{1}{8}$  cup or more).

<sup>2</sup> If a CE offers a milk substitute, the CE must notify TDA using the *Milk Substitute Worksheet* which is available at [www.squaremeals.org](http://www.squaremeals.org). NSLB/SBP operators must follow the NSLP/SBP requirements as described in *Administrator's Reference Manual, Section 13, Accommodations Students with Medical Disabilities and Special Dietary Needs*.

## Beans and Peas

- If two distinct servings of beans and peas (legumes) are provided, the CE may credit one serving toward the vegetable component and one serving toward the meat/meat alternate component as long as the beans and peas (legumes) are in separate food items and are not the same vegetable. Two serving of the same vegetable at the same meal service cannot be credited as one serving of the vegetable component and one serving of the meat/meat alternate component for pre-K students.

## Juice

- Juice must be full strength, 100 percent juice. Mixed fruit and vegetable juice credit as either the fruit or vegetable component (not both) based on the most prominent ingredient.
- Pureed fruits or vegetables in a smoothie may be credited toward the fruit and/or vegetable component as 100 percent juice. The limitation on the number of juice servings per day applies to the juice in a smoothie.
- Fruit juice is creditable at one meal per day across all meals at the site.
  - If a single CE operates all CNPs at the site, juice served to a pre-K student is creditable at one meal or snack per day across all meals served.
  - If two CEs operate different CNPs at the same site, juice served to a pre-K student is creditable at one meal or snack per day across all meals served by each CE at the site.

The *Juice Service Chart* illustrates the number of times juice may be served based on the number of CNPs the CE operates.

Juice Service Chart		
If a CE operates any one or more CNPs, SBP only NSLP only SBP and NSLP SBP, NSLP, and ASCP SBP, NSLP, ASCP, and pre-K At Risk SBP, NSLP, and CACFP At Risk CACFP At Risk Snack only CACFP At Risk Supper only		juice is creditable as the fruit or vegetable component (not both) for pre-K students one time across all meals or snacks served each day at the same site operated by the same CE.

## Minimum Creditable Amount for Fruit and Vegetables

- The minimum creditable amount for fruits and vegetables is  $\frac{1}{8}$  of a cup.

## Whole Grain-Rich

### Serving

- One whole grain-rich food item must be served each day across all meals.
- Crediting must be based on ounce equivalents by October 1, 2019. SNP CEs may base servings on ounce equivalents which are currently in use for NSLP/SBP.

### Grain-Based Desserts

- Grain-based desserts<sup>3</sup> are not creditable toward the grains component. Grain-based desserts as an extra food item are not an allowable cost.

*[NOTE: Quick breads,<sup>4</sup> pancakes, and waffles are not considered to be grain-based desserts.]*

### Breakfast Cereals

- Breakfast cereals must contain no more than 6 grams of sugar<sup>5</sup> per dry ounce.
- Breakfast cereals must be whole grain, enriched, or fortified.

## Meat/Meat Alternates

### Serving

- Meat/Meat alternates may be served for the entire grain component no more than three times per week for breakfast.

### Meat Alternates

- Tofu may be served.<sup>6</sup>
- Yogurt must contain no more than 23 grams of sugar per 6 ounces.

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<sup>3</sup> Grain-based desserts include, but are not limited to, graham crackers, sweet crackers, cereal bars, breakfast bars, granola bars, sweet rolls, sweet pie crusts, doughnuts, toaster pastries, cake, and brownies.

<sup>4</sup> See *Exhibit A* of the *USDA Memo CACFP 02-2017, Grain Requirements in the Child and Adult Care Food Program, Questions and Answers* for additional information on crediting quick breads. USDA will be updating the *Food Buying Guide for Child Nutrition Programs* to include this information. Available at <http://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>

<sup>5</sup> This formula is not the same formula used to calculate sugar for Competitive Foods.

<sup>6</sup> Same specifications as NSLP/SBP, see the *Administrator's Reference Manual, Section 8 Breakfast* or *Section 9, Lunch* for additional information on the specifications.

## Dietary Specifications

### Sugar

- Breakfast cereals can have no more than 6 grams of sugar per dry ounce.
- Yogurt can have no more than 23 grams of sugar per 6 ounces.

### Daily Specifications

- All dietary specifications for the pre-K meal pattern are based on daily or individual item limits; therefore, meals served under the pre-K meal pattern are not included in the weekly dietary specifications for NSLP/SBP.
- Pre-K students may be served the same size portions as older students as long as the daily or individual food item specifications are met.

#### Information Box 1

##### Calculating the Amount of Sugar in Breakfast Cereal

To determine if there is more than 6 grams of sugar per ounce, use the following formula:

1. Find the serving size in grams and the amount of sugar per serving on the product label.
2. Divide the total sugars by the serving size in grams.

$$\frac{\text{Total Grams Sugar per Serving}}{9 \text{ Grams}} \div \frac{\text{Total Grams Serving Size}}{55 \text{ Grams}} = \frac{\text{Grams of Sugar per Ounce}}{0.164}$$

If the answer is 0.212 or less, the cereal is within the required sugar limits.

##### Calculating the Amount of Sugar in Yogurt

To determine if there is more than 6 grams of sugar per ounce, use the following formula:

1. Find the serving size in grams and the amount of sugar per serving on the product label.
2. Divide the total sugars by the serving size in grams.

$$\frac{\text{Total Grams Sugar per Serving}}{23 \text{ Grams}} \div \frac{\text{Total Grams Serving Size}}{6 \text{ Grams}} = \frac{\text{Grams of Sugar per Ounce}}{3.833}$$

If the answer is 3.833 or less, the yogurt is within the required sugar limits.

## Meal Service Options

### Offer Versus Serve (OVS)

- OVS is not allowed for pre-K students.

### Family Style

- Family style service is allowed for all age groups.

# Crediting

## Alternate Meal Item

- For CACFP sites (with pre-K students/children) that are not NSLP/SBP operators, regulations allow a parent to replace one food component in a reimbursable meal. For NSLP/SBP sites providing pre-K meals, the parent may provide food items for the student to eat onsite as long as it is allowable under local policy. However, the CE must provide all meal components for a reimbursable meal— the parent cannot replace a food component for a reimbursable meal.

## Standardized Recipes

- CEs may credit food items with more than one component if the CE uses a standardized recipe, CE-developed or manufacturer developed.<sup>7</sup>
  - All USDA Foods recipes are standardized; therefore, CEs may use the crediting information provided on the recipe as long as the CE follows the recipe.
  - Child Nutrition (CN) label crediting information is created using standardized recipes; therefore, CEs may use the crediting information as long as the CE follows the recipe.
  - A manufacturer may provide a product formation statement with crediting information; therefore, if a product formula statement is provided, the CE may use the crediting information as long as the product is prepared and served as specified.<sup>8</sup>
  - CEs may also create their own standardized recipes using the information provided in the *Food Buying Guide for Child Nutrition Programs*<sup>9</sup> in the recipe analysis section and credit components based on the calculations described in the standardized recipe development process.

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<sup>7</sup> USDA provides guidance on creating standardized recipes in the *Food Buying Guide for Child Nutrition Programs*, available at <http://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>

<sup>8</sup> See the *Administrator's Reference Manual, Section 24, Child Nutrition (CN) Labeling and Product Documentation* for additional information on this topic.

<sup>9</sup> Available at <http://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>

## **Students with Medical Disabilities or Special Dietary Needs**

For meal service provided under NSLP or SBP for pre-K students, CEs must follow the guidance described in the *Administrator's Reference Manual, Section 13, Accommodating Students with Medical Disabilities and Special Dietary Needs*.

## **A La Carte Items**

CEs may sell a la carte items to pre-K students. However, the sale of a la carte items must not encourage a student to purchase an a la carte item over a reimbursable meal. A la carte sales for pre-K students must meet the competitive food rule.

## **Performance-Based Reimbursement**

When the CE serves pre-K students under the NSLP program, all reimbursable lunches served, including lunches to pre-K students, earn the performance-based reimbursement.

## **Severe Need**

When a CE serves pre-K students under NSLP/SBP, all reimbursable meals served, including meals served to pre-K students, earn severe need reimbursement if the CE/site receives severe need reimbursement.

## **Pre-K Meal Pattern for School Nutrition Programs (SNPs)**

The following charts provide general information on the portion size requirements for each food component for pre-K students for SNPs.

- For more detailed guidance on the pre-K meal pattern, see the *Child and Adult Care Food Program—Child Care Centers Handbook*, available at [www.squaremeals.org](http://www.squaremeals.org).
- For more detailed guidance on the SBP meal pattern see *Administrator's Reference Manual, Section 8, Breakfast*, available at [www.squaremeals.org](http://www.squaremeals.org).
- For more detailed guidance on the NSLP meal pattern see *Administrator's Reference Manual, Section 9, Lunch* which is available at [www.squaremeals.org](http://www.squaremeals.org).

## Nutrition Standards in the School Breakfast Program (SBP)—Meal Pattern Chart—As of October 1, 2017

*Minimum Amount of Each Food Component Per Week (Minimum Offering Per Day)*

Pre-Kindergarten(Pre-K)Daily			School Age Daily and Weekly				
Meal Pattern Components	Age 1-2	Age 3-5	Meal Pattern Components	Grades K-5	Grades 6-8	Grades 9-12	Grades K-12
<b>Fluid Milk</b> <sup>10</sup> (1 percent or less low fat or fat free, unflavored)	(½) cup <i>or</i> (4) fl oz	(¾) cup <i>or</i> (6) fl oz	<b>Fluid Milk</b> (1 percent or less low fat, unflavored; fat free, unflavored or flavored)	5 (1) cups	5 (1) cups	5 (1) cups	5 (1) cups
<b>Fruits and Vegetables</b> <sup>11</sup>	(¼) cup	(½) cup	<b>Fruit and Vegetables</b>	5 (1) cups	5 (1) cups	5 (1) cups	5 (1) cups
<b>Grains</b> <sup>12</sup> (whole-grain rich, enriched, or fortified)			<b>Grains</b> (whole-grain rich)	7.0-10 .0 (1.0) oz eq	8.0-10.0 (1.0) oz eq	9.0-10 .0 (1.0) oz eq	9.0-10 .0 (1.0) oz eq
<i>Bread Product: (i.e., biscuit, roll, muffin)</i>	(0.5) oz <i>or</i> (½) slice		<b>Nutrient Specifications: Daily Amount Based on Average 5-Day Week</b>				
<i>Cooked: Cereal Cereal Grain Pasta</i>	(0.5) oz <i>or</i> (¼) cup		<b>Min-MaxCalories(kcal)</b>	350-500	400-550	450-600	450-500
			<b>Saturated Fat</b> (% of total calories)	< 10	< 10	< 10	< 10
<i>Ready-To-Eat Breakfast Cereal, Dry or Cold:</i> <sup>13</sup> <i>Flakes or Rounds</i> <i>Puffed Cereal</i> <i>Granola</i>	(0.5) oz <i>or</i> (½) cup		<b>Sodium Target 1 (mg)</b>	T1: ≤540 mg T2: ≤ 485 mg	T1: ≤540 mg T2:≤ 535 mg	T1: ≤ 540 mg T2:≤ 570 mg	T1: ≤ 540 mg T2:≤ 485 mg
	(1.0) oz <i>or</i> (¾) cup		<b>Trans Fat</b>	Product nutrition label/manufacturer specification must indicate 0 grams of <u>trans</u> fat per serving.			
	(0.5) oz <i>or</i> (⅛) cup						

<sup>10</sup> Pre-K students are not given a choice of milk.

<sup>11</sup> Juice must be full strength (100 percent juice) and may be used to meet the vegetable or fruit requirement at one meal per day, including snack.

<sup>12</sup> At least one serving per day, across all meals served must be whole grain-rich unless a meat/meat alternate is being served in place of grain that day. Meat and meat alternates may be substituted for the entire grain requirement a maximum of three times a week. Grain-based desserts (i.e., graham crackers, sweet crackers, cereal bars, breakfast bars, granola bars sweet rolls, sweet pie crusts doughnuts, toaster pastries, cake, brownies, etc.) are not creditable toward meeting the grains requirement.

<sup>13</sup> Until October 1, 2019, the minimum serving size for any type of ready-to-eat breakfast cereals is ¼ cup for children ages 1-2 and ½ cup for children ages 3-5. Breakfast cereals must be whole grain, enriched, or fortified and contain no more than 6 grams of sugar per dry ounce (21.2 grams sucrose and other sugars per 100 grams of dry cereal).

Nutrition Standards in the National School Lunch Program (NSLP)—Meal Pattern Chart—As of October 1, 2017							
Minimum Amount of Each Food Component Per Week (Minimum Offering Per Day)							
Pre-Kindergarten Lunch Meal Pattern			School Age Daily and Weekly				
Meal Pattern Components	Age 1-2	Age 3-5	Meal Pattern Components	Grades K-5	Grades 6-8	Grades K-8	Grades 9-12
<b>Fluid Milk<sup>14</sup></b> (1 percent or less low fat or fat free, unflavored)	(½) cup or (4) fl oz	(¾) cup or (6) fl oz	<b>Fluid Milk</b> (1 percent or less low fat, unflavored; fat free, unflavored or flavored)	5 (1) cups	5 (1) cups	5 (1) cups	5 (1) cups
<b>Fruits<sup>15</sup></b>	(⅙) cup	(¼) cup	<b>Fruits</b>	2½ (½) cups	2½ (½) cups	2½ (½) cups	5 (1) cups
<b>Vegetables</b>	(⅙) cup	(¼) cup	<b>Vegetables</b>	3¾ (¾) cups	3¾ (¾) cups	3¾ (¾) cups	5 (1) cups
			<b>Dark Green</b>	½ cup	½ cup	½ cup	½ cup
			<b>Red/Orange</b>	¾ cup	¾ cup	¾ cup	1¼ cups
			<b>Beans/Peas (Legumes)</b>	½ cup	½	½	½
			<b>Starchy</b>	½ cup	½ cup	½ cup	½ cup
			<b>Other Additional Vegetable</b>	½ cup	½ cup	½ cup	¾ cup
<b>Grains</b> (whole grain-rich or enriched) <sup>16</sup>			<b>Grains</b> (whole grain-rich)	8.0-9.0 (1.0) oz eq	8.0-10 .0 (1.0) oz eq	8.0-9.0 (1.0) oz eq	10.0-12.0 (2.0) oz eq
<i>Bread product such as biscuit, roll, or muffin</i>	(0.5) oz or (½) serving						
<i>Cooked breakfast cereal, cereal grain, and/or pasta</i>	(0.5) oz or (¼) cup						
<b>Meat/Meat Alternates<sup>17</sup></b>			<b>Meat/Meat Alternates</b>	8-10 (1) oz eq	9-10 (1) oz eq	9-10 (1) oz eq	10-12(2) ozeq
<i>Lean meat, poultry, or fish</i>	(1.0) oz	(1.5) oz	<b>Other Nutrient Specifications: Daily Amount Based on the Average for a 5-Day Week</b>				
<i>Tofu, soy product, or alternate protein products</i>	(1.0) oz	(1.5) oz	<b>Min-Max Calories</b> (kcal)	550-650	600-700	600-650	750-850
<i>Cheese</i>	(1.0) oz	(1.5) oz	<b>Saturated Fat</b> (% of total calories)	< 10	< 10	< 10	< 10
<i>Large egg</i>	(1.0) oz eq or (⅙) cup	(1.5) oz eq or (⅙) cup	<b>Sodium Target 1</b> (mg)	T1: ≤ 1230 mg T2: ≤ 935 mg	T1: ≤ 1360 mg T2: T2: ≤ 1035 mg	T1: ≤ 1230 mg T2: ≤ 935 mg	T1: ≤ 1420 mg T2: ≤ 1080 mg
<i>Peanut butter, soy nut butter, or other nut or seed butter</i>	(1.1) oz or (2) Tbsp	(1.7) oz or (3) Tbsp	<b>Trans Fat</b>	Product nutrition label/manufacturer specification must indicate 0 grams of <u>trans</u> fat per serving.			
<i>Yogurt, plain, or flavored unsweetened or sweetened</i>	(4.0) oz	(6.0) oz					
<i>Peanuts, soy nuts, tree nuts, or seeds</i>	(0.50) oz	(0.75) oz					

<sup>14</sup> Pre-K students are not given a choice of milk.

<sup>15</sup> Juice must be full strength (100 percent juice) and may be used to meet the vegetable or fruit requirement at one meal per day, including snack. A vegetable may be used to meet the entire fruit requirement. When two vegetables are served at lunch or supper, two different kinds of vegetables must be served.

<sup>16</sup> Grain-based desserts (i.e., graham crackers, donuts, pop tarts, cinnamon rolls, granola bars etc.) are not creditable toward meeting the grains requirement.

<sup>17</sup> Yogurt must contain no more than 23 grams of total sugars per 6 ounces. Any combination of peanuts, soy nuts, tree nuts, or seeds may be credited to meet 50% of the minimum amount to be served.

The following chart may assist CEs as they determine the appropriate serving sizes based on different methods of measurement.

Measurement Conversion Chart (Converting Common Serving Portion Sizes into Applicable Measurement Methods) <sup>18</sup>								
Component		Other	Volume		Weight		Scoop Size (Scoop serving per quart)	
			Level Measure (cup, tablespoon/ Tbsp)	Fluid Ounce (fl oz)	Ounce (oz)	Ounce Equivalent (oz eq)		
Fluid Milk		--	½ cup	4	--	--	--	
		--	¾ cup	6	--	--	--	
Fruits/Vegetables		--	¼ cup	--	--	--	16	
		--	½ cup	--	--	--	8	
Grains	<i>Bread Product: (biscuit, roll, muffin)</i>	½ serving	--	--	0.5 oz	0.5 oz eq	--	
	<i>Cooked: Cereal, Cereal Grain, Pasta</i>	--	¼ cup	--	0.5 oz	0.5 oz eq	16	
	<i>Ready-To-Eat</i>	Breakfast Cereal (Dry /Cold)	<i>Flakes/Rounds</i>	--	0.5 oz	0.5 oz eq	8	
	<i>Puffed</i>		--	¾ cup	--	1.0 oz	1.0 oz eq	4
	<i>Granola</i>		--	⅛ cup	--	0.5 oz	0.5 oz eq	30
Meat/Meat Alternates	<i>Lean meat, poultry, or fish</i>	--	--	--	1.0 oz	1.0 oz eq	--	
		--	--	--	1.5 oz	1.5 oz eq	--	
	<i>Tofu, soy product, or alternate protein products</i>	--	⅛ cup	--	1.1 oz	0.25 oz eq	30	
		--	⅓ cup	--	1.5 oz	0.33 oz eq	12	
	Cheese	--	¼ cup	--	1.0 oz	1.0 oz eq	16	
		--	⅓ cup	--	1.5 oz	1.5 oz eq	12	
	Large egg	½ serving	⅛ cup	--	--	1.0 oz eq	30	
		¾ serving	⅓ cup	--	--	1.5 oz eq	12	
	<i>Cooked dry beans or peas</i>	--	¼ cup	--	0.5 oz	1.0 oz eq	16	
		--	⅜ cup	--	0.75 oz	1.5 oz eq	10	
	<i>Peanut butter, soy nut butter, or other nut or seed butter</i>	--	2 Tbsp	--	1.1 oz	1.0 oz eq	30	
		--	3 Tbsp	--	1.7 oz	1.5 oz eq	20	
	<i>Yogurt, plain, or flavored unsweetened or sweetened</i>	--	¼ cup	--	2.0 oz	0.5 oz eq	16	
		--	½ cup	--	4.0 oz	1.0 oz eq	8	
		--	¾ cup	--	6.0 oz	1.5 oz eq	4	
	<i>Peanuts, soy nuts, tree nuts, or seeds</i>	--	--	--	0.5 oz	1.0 oz eq	--	
		--	--	--	0.75 oz	1.5 oz eq	--	

<sup>18</sup> The Food Buying Guide for Child Nutrition Programs available at <http://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs> provides additional information on converting amounts.

## TDA Forms

TDA provides the following forms on the *SquareMeals* website<sup>19</sup> to assist CEs in implementing the guidance presented in this section:

- *Daily Food Production Record for Central Kitchen, Receiving Kitchen, and Onsite Kitchen*
- *Fluid Milk Substitute Worksheet*

## Records Retention

CEs must retain documentation about food production and service. All documentation or records must be kept on file for a minimum of five years for public and charter schools or three years for private schools, nonprofit organizations, and residential child care institutions after the end of the fiscal year to which they pertain. CEs have the option to maintain records on paper or electronically.

TDA may also request documentation for both offsite and onsite administrative review. CEs are encouraged to develop a system of document retention that allows them to readily retrieve documentation.

For more information on the specific types of documentation that are required, see *Administrator's Reference Manual, Section 3, Records Retention*.

Information Box 2
Records Retention
Public and charter schools are required to keep documentation related to school nutrition programs for 5 years.
Nonprofit private schools, other organizations, and residential childcare institutions (RCCIs) are required to keep documentation for 3 years.

## Food Production Documentation

The CE must keep complete and accurate food production documentation including, but not limited to, food production records, menus, standardized recipes, Child Nutrition (CN) labels, production formulation statements, records indicating food substitutions, invoices or receipts for food products purchases, and meal pattern contribution documentation for the meals they produce. Food production documentation demonstrates that the meals served and claimed met meal pattern requirements and are, therefore, reimbursable.<sup>20</sup>

For meals served to pre-K students, CEs may use their existing NSLP/SBP food production record system as long as they retain documentation that demonstrates their compliance with the meal pattern which includes, but is not limited to, portion sizes, number of servings prepared, number of servings served, and amount of not served. CEs may keep separate records for pre-K students or may combine the records with other age/grade groups. CEs may also use the CACFP food production record form for pre-K meals.

While there is no one specific strategy for maintaining food production documentation, TDA

<sup>19</sup> Available at [www.squaremeals.org](http://www.squaremeals.org).

<sup>20</sup> See *Administrator's Reference Manual, Section 7, Counting and Claiming* for additional information on the claims process.

recommends that each CE develop a system that aligns to its menu cycle.

*For Example: A CE uses a four-week menu cycle. For each week, the CE has created a notebook that has a divided section for each serving day of week. In each daily section, the CE has collected that day's food production documentation, standardized recipes, product labels or manufacturer product formulation statements, and other information.*

CEs should keep in mind that this requirement includes all meal services (breakfast, lunch, and snack) including salad and other food bars, quick lines, sack meals, field trips, etc.

CEs should use the following guidance in maintaining production records:

- These records must show how the meals offered and served<sup>21</sup> contribute to the required food components and food quantities for each age/grade group every day including, but not limited to,
  - food item replaced,
  - substituted food item, and
  - reason for substitution.
- Any meal claimed for reimbursement must be supported by food production documentation.

### **Planned, Offered, and Selected/Served**

CEs must use the following definitions as they prepare menus and production documentation:

- *Planned.* A planned menu is what the menu planner intends to offer to students. It represents the CE's calculation of the items that will need to be prepared for a school's usual average daily participation (ADP). Ideally, the planned and the offered meals are the same.
- *Offered.* An offered menu is what is actually prepared and set out on the serving lines for students to take. Offered menus may differ from *planned* menus when there are unexpected circumstances.

*For Example: A planned food item was not received from the distributor, and the menu planner had to offer a different food item.*
- *Selected/Served.* Selected or served refers to the foods that were actually served to, or selected by,<sup>22</sup> students. Menu planners should use selected/served food item data to assist in future menu planning and reduce food waste, so the school does not offer items that students do not select. Food production records should be updated to indicate actual selected/service food items after the meal service so that production records reflect serving trends.

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<sup>21</sup> Meals service for pre-K students does not include offer versus serve (OVS), however, a student is allowed to refuse a food item.

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## Compliance

TDA will review documentation submitted through TX-UNPS, retained onsite during Administrative Reviews (ARs), or on request to ensure that the CE is in compliance with the regulations described in this section. A review will include an assessment of food production documentation and a review of the lunch meal pattern and may include a nutrient analysis of menus or individual food items served. TDA has the discretion to take fiscal action for repeat violations for the following:

- Not meeting the meal pattern requirements
- Not meeting food quantity requirements
- Not meeting nutrition standards for the week or food item as appropriate
- Inadequate or unavailable documentation<sup>23</sup>

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<sup>23</sup> See *Administrator's Reference Manual, Section 24, Child Nutrition (CN) Labeling and Product Documentation* for additional information on this topic.