




STATE OF CONNECTICUT  
DEPARTMENT OF EDUCATION



**TO:** Sponsors of School Child Nutrition Programs

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

**DATE:** April 25, 2014

**SUBJECT: Operational Memorandum #32-14**  
Clarification of the Policy on Food Consumption Outside of Foodservice Area  
and the Whole Grain-rich Requirement

This memorandum is intended to clarify two issues regarding meals offered under National School Lunch Program (NSLP) and School Breakfast Program (SBP) including:

- the policy regarding student consumption of certain lunch or breakfast items outside of the foodservice area and meal period; and
- the requirement to offer whole grain-rich products in the NSLP and SBP.

**Meal Items Outside the Foodservice Area**

Meals offered in the NSLP and SBP are intended to be consumed at school in a designated foodservice area during the established meal service period. However, the U.S. Department of Agriculture (USDA) recognizes that with limited time for lunch periods and the increased amount of fruits and vegetables offered as part of meals, some students may be inclined to save some items for consumption at a later time. As a reminder, there is no federal prohibition of this practice and the USDA encourages it as a means of reducing potential food waste and encouraging consumption of healthy school meals.

**For food safety reasons, this practice should be limited to only food items that do not require cooling or heating, such as whole fruit or a bag of baby carrots.** Schools may choose to set up sharing tables for appropriate items to minimize food waste. However, program operators should be aware of all applicable state and local food safety regulations to ensure that their policies for saving or sharing food are consistent with such standards, as well as their own Hazard Analysis Critical Control Points (HACCP) plans.

The USDA encourages program operators to use this flexibility to facilitate children's consumption of fruits and vegetables, and help reduce food waste in the NSLP and SBP. Please note that this flexibility is intended to address practical constraints that may prevent students from consuming their entire meal in the foodservice area. **It does not imply that school meals may be given to children to take home.** In addition, the USDA continues to encourage schools to allow students a reasonable amount of time to select and consume their meals during the meal service period.

**Whole Grain-rich Requirement**

The USDA would like to clarify that **100 percent whole grain** products are not required in the NSLP and SBP for either the current school year or school year 2014-15. **Whole grain-rich** products are required in both NSLP and SBP. For the current school year, **half** of all grains offered must be whole grain-rich. Beginning school year 2014-15 (July 1, 2014), **all** grains offered must be whole grain-rich.

Whole grain-rich products contain at least 50 percent whole grains by weight and any remaining grain ingredients in the product must be enriched. In addition, if the product contains any noncreditable grains, they must be present at levels less than two percent ( $\frac{1}{4}$  ounce equivalent) of the product formula. To meet this limit, the combined total of all noncreditable grains cannot exceed 3.99 grams for groups A-G (baked goods) or 6.99 grams for group H (cereal grains) and group I (ready-to-eat breakfast cereals). If noncreditable grains exceed these amounts, the entire product is considered noncreditable, even if the product meets the first two criteria.

The CSDE's handout, *Criteria for Whole Grain-rich Foods*, provides guidance to help SFAs evaluate grain products and determine whether they meet the whole grain-rich requirements. Additional guidance on allowable grains is available in the USDA's *Whole Grains Resource*.

Questions may be directed to:

COUNTY ASSIGNMENTS	CONSULTANT	E-MAIL AND PHONE
Fairfield County	Fionnuala Brown	<a href="mailto:fionnuala.brown@ct.gov">fionnuala.brown@ct.gov</a> 860-807-2129
Hartford County (towns/cities beginning with A-R)	Teri Dandeneau	<a href="mailto:teri.dandeneau@ct.gov">teri.dandeneau@ct.gov</a> 860-807-2079
Hartford County (towns/cities beginning with S-W) Windham County	Susan Alston	<a href="mailto:susan.alston@ct.gov">susan.alston@ct.gov</a> 860-807-2081
Litchfield County	Allison Calhoun-White	<a href="mailto:allison.calhoun-white@ct.gov">allison.calhoun-white@ct.gov</a> 860-807-2008
Middlesex County Tolland County	Andy Paul	<a href="mailto:andrew.paul@ct.gov">andrew.paul@ct.gov</a> 860-807-2048
New Haven County	Jackie Schipke	<a href="mailto:jackie.schipke@ct.gov">jackie.schipke@ct.gov</a> 860-807-2123
New London County	Monica Pacheco	<a href="mailto:monica.pacheco@ct.gov">monica.pacheco@ct.gov</a> 860-807-2073

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This is a numbered Operational Memorandum that contains important program information. Please read carefully and retain in a binder for future reference. Operational Memoranda are posted on the Connecticut State Department of Education's [Child Nutrition website](#).