Breakfast 2014-2015

Offer vs. Serve

3 Components Must be Offered Daily in at least the following minimum quantities		
	O R +	
Fluid Milk 1 cup milk	**Fruit/Vegetable** 1 cup†	**Grains**** 1 oz eq

***Meat/Meat Alternate can be credited as a **GRAIN** or **EXTRA**.*

***GRAIN** crediting counts as Food Item, **EXTRA** crediting does not count as Food Item.*

Grain Details
 1 oz eq Muffin (55g) **1 Food Item**
 2 oz eq Bagel† **2 Food Items**
 1 oz eq English Muffin, 1 oz Egg (as **GRAIN**) **2 Food Items**
 1 oz eq English Muffin, 1 oz Egg (as **EXTRA**) **1 Food Item**

Reimbursable Meal: Must Take at Least **3 Food Items**

NOTE: At least ½ cup of fruit/vegetable must be selected as part of the reimbursable meal

†Large grain (≥ 2 oz eq) or fruit/vegetable (≥ 1 cup) items may be planned as 1 food item or 2 food items at the discretion of the menu planner.

1 Cup Milk
1 Food Item

+

½ Cup Fruit
1 Food Item

+

4 oz Fruit Juice
1 Food Item

+

1 oz eq Muffin
1 Food Item

→ Student can decline the Milk, 1 Fruit **OR** the Muffin.

1 Cup Milk
1 Food Item

+

½ Cup Fruit
1 Food Item

+

4 oz Fruit Juice
1 Food Item

+

2 oz eq Bagel
2 Food Items

→ Student can decline the Milk **AND** 1 Fruit **OR** the Bagel.

1 Cup Milk
1 Food Item

+

1 Cup Fruit
2 Food Items

+

1 oz eq Muffin
1 Food Item

→ Student can decline the Milk **OR** Muffin, **MUST** take the Apple because it is crediting as 2 Food Items and the only fruit offered.

1 Cup Milk
1 Food Item

+

1 Cup Fruit
2 Food Items

+

2 oz eq Bagel
2 Food Items

→ Student can decline the Milk **OR** Bagel, **MUST** take the Apple because it is crediting as 2 Food Items and the only fruit offered.

1 Cup Milk
1 Food Item

+

1 Cup Fruit
1 Food Item

+

2 oz eq Bagel
2 Food Items

Student can decline the Milk **MUST** take the Bagel because it is crediting as 2 Food Items and the Apple because it is the only fruit offered.

1 Cup Milk
1 Food Item

+

1 Cup Fruit
1 Food Item

+

4 oz Fruit Juice
1 Food Item

+

2 oz eq Bagel
2 Food Items

Student can decline the Milk **AND** 1 Fruit **OR** the Bagel.

1 Cup Milk
1 Food Item

+

1 Cup Fruit
1 Food Item

+

4 oz Fruit Juice
1 Food Item

+

1 oz eq Muffin
1 Food Item

Student can decline the Milk, 1 Fruit **OR** the Muffin.

1 Cup Milk
1 Food Item

+

½ Cup Fruit
1 Food Item

+

4 oz Fruit Juice
1 Food Item

+

1 oz eq English Muffin,
1 oz Egg (as **GRAIN**)
2 Food Items

Student can decline the Milk **AND** 1 Fruit **OR** the Breakfast Sandwich.

1 Cup Milk
1 Food Item

+

½ Cup Fruit
1 Food Item

+

4 oz Fruit Juice
1 Food Item

+

1 oz eq English Muffin,
1 oz Egg (as **EXTRA**)
1 Food Item

Student can decline the Milk, 1 Fruit **OR** the Breakfast Sandwich.

1 Cup Milk
1 Food Item

+

1 Cup Fruit
2 Food Items

+

1 oz eq English Muffin,
1 oz Egg (as **GRAIN**)
2 Food Items

Student can decline the Milk **OR** Breakfast Sandwich, **MUST** take the Apple because it is crediting as 2 Food Items and the only fruit offered.

1 Cup Milk
1 Food Item

+

1 Cup Fruit
2 Food Items

+

1 oz eq English Muffin,
1 oz Egg (as **EXTRA**)
1 Food Items

Student can decline the Milk **OR** Breakfast Sandwich, **MUST** take the Apple because it is crediting as 2 Food Items and the only fruit offered.

Orange and orange juice images obtained from www.pachd.com.

Adapted from Wisconsin Department of Public Instruction

SCHOOL YEAR 2014-2015

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 School Year 2013-2014 edition of the *Offer versus Serve in the School Nutrition Programs Resource Guide*.

Table of Contents

Background/General Information 3

Use of OVS in the Child and Adult Care Food Program and Summer Food Service Program 3

OVS Basics Shared by NSLP and SBP 3

Unit Pricing 3

Identifying Reimbursable Meals under OVS (Signage, Menus, and Training) 4

Offering Choices within Components is Not OVS 4

Meal Service Systems 5

Pre-Plated Meals 5

Food Bars 6

Pre-Packaged Meals (Bagged or "Grab and Go" Meals) 6

Menu Planning and OVS 7

OVS and "Extra" Foods 8

Implementing OVS at Lunch 8

Overview of Menu Planning/OVS Changes in Lunch 8

Definitions 8

Use of OVS in the NSLP 9

The Basics 9

Food Component Requirements for Lunches 11

Meat/Meat Alternate (M/MA) Component 11

Vegetable Component 12

Fruit Component 14

Grains Component 15

Milk Component 16

Overview of Menu Planning/OVS Changes in Breakfast 17

Definitions 17

A *food component* is one of three food groups that comprise reimbursable breakfasts. These are: fruits (or vegetables as substitute); grains (with optional meat/meat alternate); and fluid milk. Schools must always offer all three food components in at least the minimum daily required quantities. 17

A *food item* is a specific food offered within the three food components. For the purposes of OVS, a school must offer at least four food items from the three required food components (fruits, grains, milk). Under

OVS, the student must select three food items, including at least ½ cup of fruits, to have a reimbursable breakfast. 17
OVS in the SBP 18
The Basics 18
OVS Menu Planning 18
Food Component/Food Item Requirements for Breakfast 20
Grains Component 20
Meats/Meat Alternates (M/MA) Offered in Place of the Grains Component 21
M/MA as “Extra” Food 22
Fruit Component 23
Milk Component 25
Questions and Answers 26

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).

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. Because of the School Year (SY) 2014-2015 changes to the SBP meal pattern and resulting changes to OVS, schools offering breakfasts must ensure that students and their parents are aware of the new requirements. In addition, SFAs and schools should highlight the SBP changes 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 school meals--parents, so they can reinforce nutrition education messages at home and students, so they know how to select a reimbursable meal. Signage and menus should provide clear information about allowable choices. This will help students easily build a reimbursable meal and is especially important to avoid problems at the point of service. Schools are encouraged to conduct training for cashiers and serving line staff so they can help students select the required food components/food items in the quantities 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, other methods should be used to inform students what choices they have.

Offering Choices within Components is Not OVS

We continue to encourage schools to offer a variety of food choices to students; this increases the likelihood that 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 to have a reimbursable meal. One common example for the SBP is cereal types. Offering four different types of cereal and instructing students to “select one” is not the same as offering four grain items. Because the student can only “select one,” only one grain item (cereal) is being offered to each student, even though the student can select from several cereal options.

Another useful example for the NSLP relates to the fruit or vegetable components. The menu planner may choose to offer a variety of fruit and would instruct the student to select a specific amount. If ½ 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 only 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. Menu planners have flexibility to offer more than the minimum requirements if they wish to do so and the dietary specifications are not exceeded. For example, if the school does not use OVS, only one or two ½ cup servings of fruit (depending on grades served and whether it is the NSLP or SBP) are needed for this component. For OVS, for all grades and for both the NSLP and SBP, only ½ cup must be selected. For example, for the NSLP, the menu planner may offer four ½ cup servings of fruit and allow the student to select three or even four servings, totaling more that the minimum required offering.

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 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 incorporate OVS 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, such as 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 a pre-plated entrée and give students choices for the fruit, vegetable, grain and/or milk components/food items separately to allow students to have some variety. A basket with a variety of fruits and/or a separate cooler with milk choices would be possible ways to implement OVS.

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, and 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 quantity. The supervising adult should encourage additional portions and selections as appropriate.

Because of the OVS requirement for the NLSP and the SBP 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 35-2011, CACFP 23-2011 "Clarification on the Use of Offer Versus Serve and Family Style" dated May 17, 2011 which is applicable to the NSLP, the SBP, and the Child and Adult Care Food Program. (http://www.fns.usda.gov/sites/default/files/SP35_CACFP23-2011os.pdf)

Food Bars

Schools are encouraged to use food bars and salad bars as a way to offer a wider variety of vegetables and fruits and to lower plate waste. Food and salad bars are permitted with OVS because they offer a lot of variety, which may facilitate students selecting foods they will consume.

To help students and cashiers easily identify reimbursable meals from food bars, menu planners 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 point of service. 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 alternate point of service 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 must have a monitor or other means approved by the Stage agency to ensure that students select the components in the required serving sizes that were credited at the point of service.

Pre-portioning is one method that may be used to ensure that students select an appropriate amount from these bars. 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. (http://www.fns.usda.gov/sites/default/files/SP31-2013os.pdf)

Pre-Packaged Meals (Bagged or "Grab and Go" Meals)

Pre-packaged meals are allowed at all levels. For senior high schools, if this is the only system available for the NSLP, OVS for all or some components must be implemented unless a school was approved by the State agency to not implement OVS. Even with such approval, these schools and schools where OVS is not required 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.

Menu Planning and OVS

SFAs must plan lunches and breakfasts that meet all meal pattern requirements and provide all students access to the required meal components and quantities. 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 (as long as ½ cup of vegetables is selected), one ½ cup serving or two ½ cup servings from any of the three fruit choices offered.

> Offering choices within components does not necessarily constitute OVS. Schools are encouraged to give students options for entrees and side items and are required to offer a variety of milk. If students are required to select every component, the SFA is not using OVS. Under OVS, students must be allowed to decline components (except for the required serving of a fruit or a vegetable).

It is up to the menu planner to determine whether students are allowed to select duplicate food items, and it is important that this information be communicated to school nutrition staff and students clearly (such as through signage or on menus). It is also recommended that menu planners allow this practice in a consistent manner, in order to minimize confusion among students and staff.

OVS and a la Carte Sales

Foods offered in reimbursable meals may also be sold a la carte. Students and cashiers need to be able to distinguish between foods considered food components/food items in reimbursable meal and a la carte foods.

If a student does not select the required food components/food items in the required quantities, 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 problems at the point of service, schools are encouraged to conduct training for cashiers and serving line staff so they can help students select reimbursable lunches and breakfasts.

For more information on requirements for a la carte and other competitive foods sold, please refer to guidance on the Smart Snacks regulation, effective July 1, 2014 (http://www.fns.usda.gov/school-meals/smart-snacks-school)

OVS and "Extra" Foods

A school may offer "extra" foods, such as ice cream or pudding, which are not creditable. These foods may complement a reimbursable meal or entice students to purchase a meal. This "extra" food may be selected by the student in addition to the meal, but may not credit toward the minimum number of food components/food items a school is required to offer under OVS. However, these "extra" foods must be included in a nutrient analysis to assess compliance with the weekly dietary specifications (calories, saturated fat, and 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	**Requirement**
Implementation of OVS	Mandatory at the senior high level Optional below senior high school level
Reimbursable Meals Number of Food Components/Food Items	Five components
Required number of selections for OVS	At all grade levels, student must select at least three components, one of which must be ½ cup of fruits or vegetables
OVS and fruit and vegetable food components/food items	Fruits and vegetables are two separate components. Student must select at least a ½ cup of fruits or vegetables or a total of ½ cup of both
Extra foods offered	Not credited for OVS

Definitions

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 quantities.

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 (fruit).

Under OVS, a student must take at least three components in the required quantities. One selection must be at least ½ cup (total) from either the fruit or vegetable component. Depending on the planned menu, the student may need to select more than one food item to have the minimum quantity needed for a component to be credited.

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:

(1) Fruits
(2) Vegetables
(3) Grains
(4) Meats/meat alternates (m/ma) and
(5) 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 select:

- 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. If ½ cup of fruit is selected, the student must select the full required daily serving of the vegetable component for it to be counted as meeting that component.

Three food components are required for an adequate nutritious meal for students and to warrant the Federal reimbursement. Within each component, different choices may be offered, giving students and many combinations for building a reimbursable meal. Example 1 below shows a typical menu that allows for choices that may be selected by students for a reimbursable lunch.

EXAMPLE 1

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)

* Two ½ cups of a fruit and of a vegetable cannot be credited as two components if the student only selects three components total. One or the other must be a full cup to count both as components.

In Example 1, the menu planner offered the daily required minimum amount for the fruit and vegetable components. The student is able to decline some of the offerings as long as at least ½ cup of fruit or vegetable is selected. In this example, the following combinations are reimbursable under OVS: ½ cup of orange slices and the turkey sandwich entrée; ½ cup of green beans, the banana and orange slices (counts as the fruit component since the full required daily serving was selected) and milk; and the hamburger and potato wedges. However, if the student selects the corn, fruit cocktail and milk, the meal is not reimbursable. S/he must select an additional ½ cup of either a fruit or vegetable or an entrée to consider that lunch reimbursable. 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. (http://healthymeals.nal.usda.gov/best-practices)

Other than selecting the required minimum fruit or vegetable serving, it is the student's choice to select or decline a food component. 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.

Five food components must be offered in at least the daily minimum required quantities and weekly minimum quantities, if applicable. However, OVS only applies to daily selections, not available choices over the school week.

Food Component Requirements for Lunches

Please note that in the following sections on the individual components (fruit, vegetables, m/ma, and grains), information that applies to each of these components is intentionally repeated.

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. The minimum quantity that may be credited towards the m/ma component is 0.25 ounce equivalent.

Grades	Daily Minimum Requirement	Weekly Requirement
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
Schools are only required to meet the daily and weekly minimum requirements for this food component. This policy is found at 7 CFR 210.7(d)(1) for eligibility to receive additional reimbursement and at 7 CFR 210.18(g)(2)(vi) for the purposes of administrative reviews. State agencies would consider SFAs compliant with the weekly ranges for this component if the FNS-developed or FNS-approved Certification Tool and required supporting documentation indicate the menu is compliant with the daily and weekly *minimums*.		

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 below. 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, the m/ma component is credited if the student selects the required daily minimum for her/his grade group. This means, again 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 meet the minimum daily quantity for 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 because 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	Weekly Minimum Requirement
K-5	¾ cup	3¾ cups
6-8	¾ cup	3¾ cups
9-12	1 cup	5 cups

Full strength juice may be offered to meet up to one-half of the weekly vegetable requirement. Menu planners may allow students to select more than the daily minimum serving of vegetables if the dietary specifications for lunches are not exceeded. The minimum quantity that may be credited towards the vegetable component is one-eighth of a cup.

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 quantity 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).

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

Example 3 below lists some possible lunch offerings containing vegetables.

EXAMPLE 3

Food items at lunch containing vegetables:

- Beef stew (contains ½ cup vegetables)
- Seasoned corn (½ cup vegetables)
- Carrot/raisin salad (½ cup fruit/vegetable combo)
- Green bean casserole (contains ¼ cup vegetables)
- Steamed green peas (¼ cup vegetables)

In Example 3, the beef stew is a main dish that contains ½ cup of vegetables, while the corn is a side item containing ½ cup of vegetables. The carrot raisin salad is a ½ cup combination of both fruits and vegetables in the same dish. Since the green beans and peas are each ¼ cup portions, taking one selection of green beans and one selection of peas meets the ½ 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 ½ 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 ½ 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. Please refer to guidance on the Smart Snacks, effective July 1, 2014, (http://www.fns.usda.gov/healthierschoolday/tools-schools-smart-snacks).

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 10th grade 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 to have both credited as components. In other words, a 10th grader 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 oz eq of grains, 2 oz eq 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)

Schools are encouraged to allow students to select more items as long as the weekly dietary specifications are not exceeded.

Using the high school menu in Example 4 above , 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 vegetable component); ½ cup orange slices (½ cup meets minimum for OVS); 1 cup unflavored milk (milk component)

OR

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

The menu in Example 4 limits the fruit and vegetable choices to two selections for each component. However, schools are encouraged to allow students to take more items if the weekly dietary specifications are met.

Fruit Component

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

Full strength juice may be offered to meet up to one-half of the weekly fruit requirement. Menu planners may allow students to select more than the daily minimum serving for fruit if the dietary specifications for average lunches offered over the school week are met. The minimum quantity that may be credited towards the fruit component is one-eighth of a cup.

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.

For OVS purposes, if a student can select more than the minimum daily required quantity of fruit (such as from a salad bar), the component is credited only once. For example, if a 5th grade student selects 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 10th grade student selects only three components and two of these are a fruit and a vegetable, s/he must select the minimum required daily serving for either the fruit or vegetable to have both credited as components. In other words, a 10th grader 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**	**Weekly Requirement**
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
Schools are only required to meet the daily and weekly minimum requirements for this food component. This policy is found at 7 CFR 210.7(d)(1) for eligibility to receive additional reimbursement and at 7 CFR 210.18(g)(2)(vi) for the purposes of administrative reviews. State agencies would consider SFAs compliant with the weekly ranges for this component if the FNS-developed or FNS-approved Certification Tool and required supporting documentation indicate the menu is compliant with the daily and weekly *minimums*.		

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. The *minimum* quantity that can be credited towards the grains component is one-quarter of an ounce equivalent (0.25 oz eq). 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 below, the burrito with chicken and brown 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 side item.

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)

Again 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 meet 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 minimum required 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 meet the grains component. This is because it does not meet the daily minimum grains quantity 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. If the student selects a grain-based dessert which meets the daily minimum requirement of 1 oz eq, 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 (at least two) milk choices. For the student to receive credit for the milk component, s/he must select at least one cup of fluid milk.

Implementing OVS at Breakfast

Overview of Menu Planning/OVS Changes in Breakfast

Function	Requirement
Implementation of OVS	Optional at all levels
Number of Food Components/Food Items for Reimbursable Meals under OVS	Four food items from three components
Required number of selections for OVS	Student must select at least three food items One selection must be at least ½ cup of fruits
OVS and the fruit food component OVS and food items for the fruit component	Vegetables may be offered to meet all or part of the fruit requirement The one cup required quantity may be offered as more than one food item One selection must be at least ½ cup of fruit (or vegetable or a combination of both).
"Extra" foods offered	Not credited for OVS
Double servings of components/food items	Allowed for fruit (or vegetable) and grains (or meats/meat alternates) components

Definitions

A *food component* is one of three food groups that comprise reimbursable breakfasts. These are: fruits (or vegetables as substitute); grains (with optional meat/meat alternate); and fluid milk. Schools must always offer all three food components in at least the minimum daily required quantities.

A *food item* is a specific food offered within the three food components. For the purposes of OVS, a school must offer at least four food items from the three required food components (fruits, grains, milk). Under OVS, the student must select three food items, including at least ½ cup of fruits, to have a reimbursable breakfast.

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

OVS in the SBP

OVS is optional at all grade levels.

The Basics

The meal pattern for breakfast consists of three food components:

(1) Fruits (or vegetables substitution)
(2) Grains (or optional credited meats/meat alternates)
(3) Milk

The age/grade groups for breakfasts are:

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

OVS Menu Planning

For OVS:

- At least four food items must be offered;
- All students, at any grade level, must select at least three food items;
- For grains (or meat/meat alternate offered for this component) and milk, the student must select the daily minimum required amount; and
- For the fruit component, the student must select at least ½ cup of fruit or vegetables;

For example, the school may offer 1 oz eq cereal; ½ cup of juice, ½ cup of berries and 8 ounces of milk as the four food items. Under OVS, the student could select cereal, milk, and ½ cup of juice for a reimbursable breakfast.

Except for selecting a ½ cup of fruit, it is the student's choice to select or decline food items. However, the menu planner determines how to offer food items, which may affect the selections a student can make to build a reimbursable breakfast. For example, 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.

If the student only wanted the waffle, s/he would not be able to decline that fruit, even if s/he did not intend to consume it.

Again, if *choices* of food items within the components are offered, the menu planner must indicate what choices or combination of choices the student may select including any minimum or maximum number that may be taken. For example, if four ½ cup servings are offered for the fruit component, the menu planner must allow the student to select a full cup but must also indicate that at least one ½ cup of fruit is required for a reimbursable meal. If the menu planner chooses, under this example, the student could be allowed to take up to all four choices.

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 with the daily minimum for the grains component (1 oz eq) and the daily minimum for the fruit component for OVS (½ cup) -- and milk, s/he has a reimbursable breakfast. These two selections equal three food items. A student would also have a reimbursable breakfast by selecting one slice of toast, the orange slices and milk. Other possible reimbursable meal combinations include: waffle with fruit and orange slices; 2 slices of toast and oranges; and 2 slices of toast and milk.

EXAMPLE 6

Menu offering 5 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]
- Apple juice (1/2 cup fruit) [1 food item]
- Variety of milk (1 cup) [1 food item]

Smoothies with fruit and milk are another popular combination food offered at breakfast. 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 the policy memo SP 10-2014, CACFP 5-2014, SFSP 10-2014 *Smoothies Offered in Child Nutrition Programs*; November 14, 2013, for additional information (http://www.fns.usda.gov/sites/default/files/SP10_CACFP05_SFSP10-2014os_0.pdf).

Food Component/Food Item Requirements for Breakfast

Grains Component

Grades	Daily Minimum Requirement	Weekly Requirement
K-5	1 ounce equivalent	7-10 ounce equivalent
6-8	1 ounce equivalent	8-10 ounce equivalent
9-12	1 ounce equivalent	9-10 ounce equivalent
Schools are only required to meet the daily and weekly minimum requirements for this food component. This policy is found at 7 CFR 210.7(d)(1) for eligibility to receive additional reimbursement and at 7 CFR 210.18(g)(2)(vi) for the purposes of administrative reviews. State agencies would consider SFAs compliant with the weekly ranges for this component if the FNS-developed or FNS-approved Certification Tool and required supporting documentation indicate the menu is compliant with the daily and weekly *minimums*.		

A grains component selection may be credited as a food item 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. 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. All grain offerings over the course of the week must be whole grain-rich.

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 (1 cup fruit) [1 fruit 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. A reimbursable breakfast could also be two slices of toast and the orange slices.

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. In addition, the menu planner determines how many foods must be selected in order to make a reimbursable meal.

A menu planner may 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 the muffin is offered as two food items, as in example 8, the student would only need one additional food item which must be the orange slices). If the student selects the three other food items in example 8, the student can decline the muffin or could select the muffin, orange slices and milk for a total of 4 food items.

EXAMPLE 8

Menu with five food items:

- Whole grain-rich muffin (2 oz eq grain) [2 grain items]
- Whole grain-rich cereal (1 oz eq grain) [1 grain item]
- Orange slices (1 cup fruit) [1 fruit 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, orange slices, milk
- Whole grain-rich cereal, orange slices , milk

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

There is no separate requirement to offer the m/ma component in the breakfast meal pattern; however, menu planners have two options for including m/ma in breakfast:

(1) A school may offer m/ma in place of grains *after* the minimum daily grains requirement (1 oz eq for all age/grade groups) is offered. 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;

OR

(2) A school may offer m/ma as an "extra" food and not credit it toward any component.

One oz eq of m/ma may count as one oz eq of grains for purposes of meeting the weekly grains component requirement.

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

Example 9 below shows a menu with the m/ma offered as one of the food items for the grains component. In this example, the student does not have to select both the cereal (grains) and the hard-boiled egg (m/ma) for the m/ma to credit. If s/he selects only the hard-boiled egg, orange slices, and milk, this is three food items. The cereal is 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 (1 cup fruit) [1 fruititem]
- Variety of milk (1 cup) [1 milk item]

Menu planners may 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 the orange slices under OVS and have three food items.

M/MA as “Extra” Food

Menu planners may also offer m/ma as “extra” food and not credit it toward any of the food components or count it as a food item. If used as an “extra” food, the m/ma does not credit toward 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 a food item for OVS. Therefore, four food items, in addition to an “extra” m/ma food, must be offered for OVS. If the menu planner opts to offer a m/ma as an “extra” food, staff and students must be aware that this “extra” food is not counted for OVS purposes and that three other food items must be selected for a reimbursable meal.

As Example 10 below shows, the hard-boiled egg is being offered as an “extra” food and may not be credited toward the grains component. Because of this, the offered menu contains only one oz eq of creditable grains (toast). There are only four items for purposes of OVS: toast, oranges, apple juice, and milk, and a student must take at least one of the fruit items plus two additional items. The egg, since it is an “extra” food, may not be counted as one of the three food items required for a reimbursable meal.

EXAMPLE 10

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

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

Fruit Component

Grades	**Daily Minimum Requirement**	**Weekly Minimum Requirement**
K-5	1 cup	5 cups
6-8	1 cup	5 cups
9-12	1 cup	5 cups

Schools may offer vegetables in place of fruits. The first two cups per week of any such substitution must be from the following subgroups: dark green, red/orange, beans/peas, or “Other vegetables” as discussed in 7 CFR 210.10 (c)(2)(iii) and program guidance. Full strength fruit or vegetable juice may be offered to meet up to one-half of the weekly fruit requirement.

At least one cup of fruit must be offered in reimbursable breakfasts for all age/grade groups. Menu planners may allow students to select more than the daily minimum serving for this component if the weekly dietary specifications, including calories, are not exceeded.

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

- ½ cup fruits
- ½ cup of vegetables offered in place of fruit
- ½ cup total of a fruit and a vegetable (when offered in place of fruit)
- ½ cup of an item with both fruit and vegetable (e.g., salsa made with tomatoes and fruit).

The menu planner may offer the fruit component as more than one food item in order to meet the required number of food items needed for OVS. The minimum quantity that may be credited towards this component is 1/8 cup. In Example 11 below, the menu planner offers the fruit component in a variety of different fruits and vegetables, and indicates that at least ½ cup must be selected but does allow students to select all four.

EXAMPLE 11

Menu with seven food items:

- Slice of toast (1 oz eq grain) [1 grain item]
- Whole grain cereal (1 oz eq grain) [1 grain item]
- Choose at least one (and up to all four) of the following items:
  - Tomato juice (½ cup fruit) [1 fruit item]
  - Apple slices (½ cup fruit) [1 fruit item]
  - Pineapple chunks (½ cup fruit) [1 fruit item]
  - Mixed berries (½ cup fruit) [1 fruit item]
- Variety of milk (1 cup) [1 milk item]

In the menu in Example 11 above, there are four fruit items offered since the student may select up to all four and a student could select the tomato juice and any two of the other items. Therefore, a breakfast containing toast, cereal, tomato juice, and apple slices would be reimbursable (*four* items selected). A breakfast containing toast, tomato juice, and apple slices would also be reimbursable (*three* items selected). A breakfast with berries, tomato juice, and apple slices would also be a reimbursable meal (*three* items selected).

EXAMPLE 12

Here is a sample list (NOT a menu) of food items with fruits and/or vegetables that credit toward the fruit component:

- Egg frittata with peppers (1/8 cup vegetable)
- 8 oz 100% orange juice (1 cup fruit)
- Mango/black bean salsa (1/8 cup fruit/vegetable combo)
- Diced pineapple (¼ cup fruit)
- Apple slices (¼ cup fruit)

Example 12 above shows how a menu planner can choose to offer amounts of less than ½ cup of the fruit component across multiple foods. For OVS, the menu planner must indicate what choices the student may select to have at least the required ½ cup of fruit. A student may take the egg frittata (1/8 cup of vegetable), the salsa (1/8 cup of fruit/vegetable) and the pineapple (1/4 cup fruit) for the ½ cup total and this combination is a reimbursable meal. Or s/he could take two servings of salsa (1/4 cup for 2 servings) with the diced pineapple (1/4 cup), for a combined total of ½ cup of fruit. Selection of these items plus

milk and a grain (not shown) would result in a reimbursable breakfast. However, if the student selects only the egg frittata and the apple slices, this only totals 3/8 cup and does not meet the daily OVS minimum of ½ cup. In this case, s/he must also select, for example, the salsa or the orange juice to provide at least the ½ cup of fruit required under 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 (at least two) milk choices. For this component to be credited for OVS, the student must select at least one cup of fluid milk.

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 vegetables.

2. Must the menu choices be offered at the point of service? For example, SFAs may use caterers or advance on-line ordering to have students place their orders prior to the meal service or make their meal selections on-line.

Yes; there is no OVS requirement that the student must be able to make her or his OVS selections on a serving line. In these situations, the students are provided choices and thus OVS is followed. These types of systems must be carefully structured and the resulting meals be checked to assure that reimbursable meals are provided. It must be clear to the student and her/his parents what the choices and requirements are for a reimbursable meal.

3. Since a ½ cup of fruit or vegetable is required under OVS for a reimbursable meal, 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 student to take the food for free and not claim it for reimbursement.

4. 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 required meal components in the appropriate quantities. Regulations, however, do not set specific requirements for signage. State agencies and SFAs may establish requirements to fit their menu, facilities, layout and other considerations. 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.

5. 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.

6. Does a combination food consisting of 1 oz eq grains and 1 oz eq meat/meat alternate (such as a breakfast sandwich) count as one or two items for purposes of OVS at breakfast?

Menu planners have two options for counting this type of food item:

(1) One option is to count the combination food (e.g., egg sandwich) as two items under the grains component. It provides at least 1 oz eq of grains (the minimum daily requirement for the grains component) plus an additional 1 oz eq of meat/meat alternate which is also counted toward the grains requirement; or

(2) The other option for the menu planner is to offer a meat/meat alternate in the combination food as an "extra" and not count it toward the grains component for purposes of OVS. Therefore, this egg sandwich as a whole counts as one grain item. Three additional items -- including fruit (or vegetable) and milk -- must be offered for OVS.

7. For a single serving line offering three entrees daily (e.g., hot entrée, cold sandwich, chef salad), must the weekly vegetable subgroups be included in the choices permitted for selection with OVS? For example, baked beans come only with the hot entrée, but students who select the chef salad may only select fruit, not beans. The beans are only offered one day a week.

Students must be able to select vegetables from each subgroup over the week, regardless of which entrée they choose. If a school elects to limit vegetable choices by entrée, then all the vegetable subgroups must be available with each entrée over the course of the week.

8. Can a student select two ½ cups fruit and milk for a reimbursable breakfast?

Yes if the menu planners offer each ½ cup of fruit as separate food items. In this example, three food items are selected for a reimbursable breakfast.

9. Can a student select a large piece of fruit (large enough to credit for 1 cup) and milk for a reimbursable breakfast?

Yes, foods that are offered in large enough quantities can credit as two food items. Therefore, an apple that is equivalent to at least one cup can credit as two food items. This practice is at the discretion of the menu planner and must be clearly communicated to staff and students to minimize confusion and ensure students are selecting reimbursable meals. In this example, the apple plus milk would result in three food items selected for a reimbursable meal for OVS.

10. For lunch, may students take a smaller portion of both fruits and vegetables under OVS?

Students must select at least ½ cup of either the fruit or the vegetable component, or a ½ cup combination of both components (¼ cup fruits and ¼ cup vegetables), for a reimbursable meal. If a student selects only three components, and two of these three components are fruits and vegetables, the student may select ½ cup of either the fruit or vegetable, but then must select the minimum daily required serving of the other component.

For example, if a student in grades 9-12 selects just milk, fruit and vegetables, the student may take ½ cup of the vegetable but must take the full 1 cup offering of the fruit. However, if the student selects another full component, such as a grain or meat/meat alternate, the student may take a smaller portion of the fruit because the fruit is no longer being counted as the 3rd component in the reimbursable meal.

11. Must the SFA prepare full servings of both fruits and vegetables for every student when OVS is in place?

SFAs must plan meals in the NSLP and SBP to meet all meal requirements and provide required amounts of food for all students. Menu planners should take into account participation and selection trends to determine what and how much food to offer students. Careful menu planning will ensure that students have access to all the required food components for the reimbursable meal and minimize food waste.

12. Can a menu planner split the food offered to meet the grains component, or the meat/meat alternate component, into multiple food items and allow students to select only one item under OVS?

Yes, menu planners may split a component into multiple items. Under OVS, the student must take at least the daily minimum required by the meal pattern. For example, a K-5 school offers 2 ounce equivalents of grains: spaghetti (1 oz eq) with a dinner roll (1 oz eq). Since the minimum daily grains requirement for grades K-5 is only 1 oz eq, the student may take either the dinner roll (1 oz eq) or the spaghetti (1 oz eq) and count as meeting the grains component under OVS. This also applies to the meat/meat alternate component. In grades 9-12, since the daily minimum is 2 oz eq, students must select at least 2 oz eq of grains or meat/meat alternate to count toward these components. Students are instructed on how much of each component must be selected through meal identification signage.