United States Department of Agriculture
Food and Consumer Service
Mountain Plains Region
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Reply to Attn of: SP-00-22
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Subject: Implementation Guidance on the Modifications and Use of Vegetable Protein Products in the School Meals Programs

To: STATE AGENCY DIRECTORS - (Child Nutrition Programs) Colorado ED, Colorado DPHE, Iowa, Kansas, Missouri ED, Missouri DH, Montana OPI, Montana DPHHS, Nebraska, North Dakota, South Dakota, Utah and Wyoming

This memorandum, originally issued directly to State directors by our National Office, is here reissued under the Regional Office respective program memorandum numbering systems, so as to facilitate reference to the memorandum in the future.

On March 9, 2000, USDA/FNS published a final rule (65 FR 12429) that addressed the use of alternate protein products (APP) in the Child Nutrition Programs and on June 8, 2000, we published an interim rule concerning the identification of products and dishes containing more than 30 percent APP. To simplify this guidance and to use terminology already commonplace in the school food service community, we have elected to use the designation of vegetable protein products (VPP) when referring to these non-meat protein sources. The major modifications made by the regulations were:

- the 30 percent limit on the amount of VPP that could be blended into a meat/meat alternate item was removed;
- the special fortification requirements for VPP used in the programs were eliminated; and

- the identification of meat, poultry or seafood products or dishes containing more than 30 percent VPP on existing menus, etc. in a way that does not characterize them solely as meat, poultry or seafood products or dishes.

By eliminating restrictions on the use of VPP, we allowed schools using the food-based menu planning approaches the same market place choices that are available to the general food service industry, including schools that have elected to use nutrient-based menu planning options. These new market place options are expected to reduce the cost of VPP sold to schools, because the food manufacturing industry will no longer have to produce items in conformance with specifications that apply only to a subset of schools participating in the school meals programs. Further, it is anticipated that eliminating previous restrictions on the use of VPP will encourage the development of new meat, poultry and seafood products that will give schools an economical way to expand offerings of popular meat-based entrees.

In addition, we feel the modification will help schools meet the demand for non-meat menu items based on cultural or religious preferences. It will further enhance flexibility in menu planning to assist schools in meeting legislatively-mandated nutrition standards.

We wish to note, however, that while we believe the regulatory flexibility now available to schools with respect to the use of VPP represents a major program improvement, school menu planners should continue to be mindful of the importance of meat, poultry, and fish products in children's overall diets. Not only are such products important sources of high quality protein, they are also important sources of key nutrients such as iron and zinc. Further, meat, poultry, and fish entree items are important contributors to a meal service that attracts and sustains high levels of participation—a goal important to everyone concerned about the nutritional well-being of our Nation's children.

We also remain sensitive to concerns expressed during the regulation's development that new products that may be introduced into school meal service as a result of this new rule may cause some confusion. Therefore, to protect the health, growth, and cognitive development of school children, the Food and Nutrition Service (FNS) will collaborate with representatives of meat and poultry producer organizations, representatives of the food manufacturing industry, including manufacturers of VPP, and representatives of the school food service community to consider options for fortification, names and labeling of items extensively formulated with VPP that may be offered in school meals programs. We will also work with representatives from the Food Safety and Inspection Service and the Food and Drug Administration regarding such options. The Department will then consider what actions are appropriate for future policy or guidance materials.

Guidance on Implementation

We would like to clarify some points on the use of VPP. School food authorities may continue to use any VPP in inventory or on order and may continue to purchase VPP that meet the previous requirements on the percentage of VPP and fortification.

Pending outcomes from the above-mentioned collaboration, school food authorities may develop their own specifications for VPP to meet their customers' particular needs and preferences. This includes specification of VPP levels and types and levels of nutrient fortification. With respect to product fortification, we noted in the preamble to the final rule that one commentor stated that over 66 percent of the VPP commercially available are presently fortified with iron and zinc. School food authorities may want to include fortification requirements in the procurement specifications they issue for VPP.

It is anticipated that most meat, poultry and seafood products blended with VPP will be purchased in the commercial market place. However, for those school food authorities that choose to use VPP in their own recipes, we strongly recommend using standardized recipes to ensure ongoing customer satisfaction, accuracy of nutrition

information provided to students and their families, and to ensure compliance with nutrition standards. Resources, such as FNS' "A Tool Kit for Healthy School Meals: Recipes and Training Materials" or "Quantity Food Preparation: Standardizing Recipes and Controlling Ingredients" by Dr. Polly Buchanan and available from the American Dietetic Association, are very helpful in this regard.

School food authorities should be able to identify dishes and food items in meals offered so that students and their parents can make informed food choices. This becomes especially important for those children who may have an allergy to specific foods or ingredients. We also wish to emphasize the importance of offering a variety of food choices on the menu to assist students in achieving overall diets that conform to the Dietary Guidelines for Americans and the recommendations of the Food Guide Pyramid. To this end, we highly recommend that school food authorities develop menus that provide choices of entrees as well as other menu items.

We hope this information will help you understand and implement the modifications to the regulations on VPP. If you have any questions, please contact the Child Nutrition Program in the Regional Office at (303) 844-0355 or (303) 844-0359.

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Child Nutrition Programs