This memorandum provides guidance to State agencies to address the issues that some school food authorities (SFAs) are experiencing in meeting the whole grain-rich requirements.

**Whole Grain-Rich Requirements**

Beginning July 1, 2014, federal regulations require that all grains offered in the National School Lunch Program and School Breakfast Program must be whole grain-rich. Foods that meet the whole grain-rich criteria for the school meal programs contain at least 50 percent whole-grain meal and/or flour. The remaining 50 percent or less of grains, if any, must be enriched. Foods that are 100 percent whole grain meet the whole grain-rich criteria; however, foods are not required to be 100 percent whole grain. Foods containing between 50 and 100 percent whole grains are allowable. For additional information on whole grain-rich requirements, including how to evaluate if a grain product meets the whole grain-rich criteria, see the *Whole Grain Resource for the National School Lunch and Breakfast Programs: A Guide to Meeting the Whole Grain-Rich Criteria*, available at: http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf.

**Availability and Acceptability of Whole Grain-Rich Pasta**

The updated standards, which meet the requirement of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) to reflect the Dietary Guidelines for Americans, are designed to ensure that school children receive nutritious meals while retaining flexibility for SFAs to offer meals that are appealing to children.

Pasta is a commonly served menu item popular with students. As such, it is particularly important that the updated standards maintain acceptability with students. Many types of whole grain-rich pasta, including those available through USDA Foods, are 100 percent whole grain. However, Program operators have indicated and our consultation with the pasta industry supports, that some of the available products degrade easily (e.g. lasagna and elbow noodles) during preparation and storage, and as a result are not accepted by students.
Whole grain-rich pastas made from blends of whole grain and enriched flours may maintain better consistency and be more acceptable to students, but these products are still emerging in the marketplace. Therefore, FNS recognizes that USDA Foods and industry may need additional time to develop a more expansive range of whole grain-rich pastas that are widely accepted by students.

**Flexibility to Use Enriched Pasta During School Years (SY) 2014-2015 and 2015-2016**

FNS appreciates that the progression to all whole grain-rich grains in school meals represents a significant transition for industry, Program operators, and students. FNS understands that during SYs 2014-2015 and 2015-2016, some SFAs may continue to struggle to secure a variety of whole grain-rich pasta products to incorporate into preferred menu items customarily served in previous SYs. As such, FNS is prepared to offer continued flexibility in this area for those SFAs that removed previously popular pasta menu items that, when produced with whole grain-rich pasta, did not hold well or were not accepted by students (meaning students no longer consumed or selected the popular item), and the SFA has demonstrated hardship in obtaining acceptable whole grain-rich pasta for that item. Accordingly, if acceptable products for previously offered items are not available or accepted by students, the State agency may approve the SFA’s request to continue to serve enriched pasta during SY 2014-2015 and SY 2015-2016, if needed. However, this flexibility is available only until acceptable products are available and identified and while the SFA can demonstrate a continued negative impact.

In reviewing the SFA’s request, State agencies should consider several factors. An SFA must provide evidence that they attempted to use the product in a previously popular menu item and that the SFA experienced significant challenges in achieving positive results. For example, an approvable request may state that the use of the new whole grain-rich pasta or the degradation of the new whole grain-rich pasta during the typical holding time negatively impacted the taste and texture of the product, and that the SFA received increased negative student or parent feedback as a result of this change. Based upon this information, the State agency should also work with the SFA to identify the challenge and provide technical assistance as needed. This explanation is particularly helpful as it will enable FNS to better identify any specific trends or patterns and tailor technical assistance or targeted solutions to mitigate challenges.

FNS anticipates that State agencies and SFAs will actively collaborate to identify, evaluate, and incorporate acceptable whole grain-rich pasta products into school menu(s). While working with State agencies, SFAs that have been approved to offer non-whole grain-rich pastas should be considered compliant with the whole grain-rich requirements during an Administrative Review or a performance-based certification review.

FNS expects State agencies to continue to work closely with SFAs and provide technical assistance to support their efforts to comply with whole grain-rich requirements as they apply to pasta and other food items. At the national level, FNS will continue to support States and SFAs and collaborate with industry partners to expand the selection of whole grain-rich pastas available to schools, and develop technical resources to assist Program operators with
preparation methods for whole grain-rich pasta. FNS will continue to communicate this information through PartnerWeb and on the FNS public website.

The *Whole Grain Resource for the National School Lunch and Breakfast Programs*, referenced earlier, provides information to help Program operators identify foods that meet the whole grain-rich criteria and offers suggestions for incorporating whole grain-rich foods into school menus. In addition, for a current list of available whole grain-rich pasta products, SFAs may search the USDA Foods available at: http://www.fns.usda.gov/sites/default/files/SY15_Foods_Available_List_3_27_14.pdf, CN Labeling authorized list available at: http://www.fns.usda.gov/cnlabeling/authorized-manufacturers-and-labels and the Alliance for A Healthier Generation website available at: https://schools.healthiergeneration.org/resources__tools/

FNS is committed to working in partnership with State agencies and SFAs as they make these important changes in their communities. State agencies are reminded to distribute this memo to Program operators immediately. SFAs should contact their State agencies for additional information. State agencies may direct any questions concerning this guidance to the appropriate FNS Regional Office.

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