Requirements for Alternate Protein Products in the National School Lunch Program and School Breakfast Program

This guidance applies to meals for preschoolers (ages 1-4) and grades K-12 in the U.S. Department of Agriculture's (USDA) National School Lunch Program (NSLP), School Breakfast Program (SBP), Seamless Summer Option (SSO) of the NSLP, and Afterschool Snack Program (ASP) of the NSLP.

The meal patterns for grades K-12 in the NSLP and SSO list the meat/meat alternates component in ounce equivalents. The meal patterns for grades K-12 in the ASP and preschoolers in the NSLP, SSO, and ASP list the meat/meat alternates component in ounces. The amount of alternate protein products that equals 1 ounce equivalent or 1 ounce is the same (1 ounce of alternate protein products).

The SBP meal patterns do not require the meat/meat alternates component. For grades K-12 at breakfast, school food authorities (SFAs) may substitute 1 ounce equivalent of the meat/meat alternates component for 1 ounce equivalent of the grains component, after offering the minimum daily 1 ounce equivalent of grains. For preschoolers at breakfast, SFAs may substitute the meat/meat alternates component for the entire grains component up to three times per week.

An alternate protein product (APP) is a food ingredient that may be used alone or in combination with meat, poultry, or seafood. They are processed from soy or other vegetable protein sources and may be dehydrated granules, particles, or flakes. Some examples include soy flours, soy concentrates, soy isolates, whey protein concentrate, whey protein isolates, and casein. APPs may be used in the dry (nonhydrated), partially hydrated, or fully hydrated form.



APPs are generally used as part of a formed meat patty or in a vegetarian patty resembling a meat product. Examples of foods with added APPS include beef patties, beef crumbles, pizza topping, meat loaf, meat sauce, taco filling, burritos, and tuna salad. APPs do not include tofu, surimi, seitan, or tempeh. Processed food items such as vegetarian burgers may contain APP, but the food item itself is not an APP because it contains other ingredients such as seasonings or breading.

If an APP meets the USDA's APP requirements, a 1-ounce serving of APP provides 1 ounce equivalent of the meat/meat alternates component for grades K-12 and 1 ounce of the meat/meat alternates component for preschoolers.

Criteria for APPs

APPs must meet the USDA's requirements specified in appendix A of the NSLP regulations (7 CFR 210) and appendix A of the SBP regulations (7 CFR 220). These regulations specify that APPs may credit for part or all the meat/meat alternates requirement only if they meet the three criteria below.

- 1. The APP must be processed so that some portion of the non-protein constituents of the food is removed. This refers to the manufacturing process for APP. APP must be safe and suitable edible products produced from plant or animal sources.
- 2. The biological quality of the protein in the APP must be at least 80 percent of casein (milk protein), determined by performing a Protein Digestibility Corrected Amino Acid Score (PDCAAS). The PDCAAS is a method of evaluating protein quality.
- 3. The APP contains at least 18 percent protein by weight when fully hydrated or formulated. "When hydrated or formulated" refers to a dry APP and the amount of water, fat, oil, colors, flavors, or any other substances that have been added.

Menu planners cannot determine if an APP product meets the three USDA criteria by reading the product's label. The labeling laws of the USDA's Food Safety Inspection Service (FSIS) and Food and Drug Administration (FDA) require manufacturers to list product ingredients, but percentage labeling is voluntary. For example, a product may list whey protein concentrate and hydrolyzed soy protein in the ingredients, but will not indicate the percentage of these protein ingredients by weight. For more information, see the USDA's handout, *Questions and Answers on Alternate Protein Products*.

Required Documentation

SFAs must obtain documentation from the manufacturer that the product meets the APP criteria. Acceptable documentation includes:

- a Child Nutrition (CN) label;
- product formulation statement (PFS) from the manufacturer; or
- a signed letter from a company official attesting that the APP meets the USDA's requirements.

The manufacturer's documentation should include information on the percent protein contained in the dry alternate protein product and in the prepared product. For an APP product mix, manufacturers should provide information on the amount by weight of dry APP in the package, hydration instructions, and instructions on how to combine the mix with meat or other meat alternates.

Without appropriate documentation, SFAs cannot use APPs to credit toward the USDA's meal patterns. Additional guidance on documenting the APP requirements is available in the USDA's *Questions and Answers on Alternate Protein Products (APP)*. For more information, see the Connecticut

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State Department of Education's (CSDE) handouts, *Product Formulation Statements* and *Child Nutrition* (CN) Labeling Program, and the USDA's handout, *Tips for Evaluating a Manufacturer's Product Formulation Statement*.

Tofu, Surimi, and Tempeh

Tofu, surimi, and tempeh have different crediting requirements because they are not APPs. For information on crediting tofu and tofu products, see the CSDE's handout, *Crediting Tofu and Tofu Products in the NSLP and SBP*. For information on crediting surimi, seitan, or tempeh, see USDA Memo SP 25-2019, CACFP 12-2019 and SFSP 11-2019: *Crediting Tempeh in the Child Nutrition Programs* and USDA Memo SP 24-2019, CACFP 11-2019 and SFSP 10-2019: *Crediting Surimi Seafood in the Child Nutrition Programs*; and the USDA's webinar, *Additional Meat/Meat Alternate Options for CNPs: Crediting Tempeh and Surimi*.

Resources

- Accepting Processed Product Documentation (CSDE): https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/AcceptDoc.pdf
- Afterschool Snack Program Handbook (CSDE): https://portal.ct.gov/-/media/SDE/Nutrition/ASP/ASPHandbook.pdf
- Child Nutrition (CN) Labeling Program (CSDE): https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/CNlabel.pdf
- Crediting Commercial Meat/Meat Alternate Products in the NSLP and SBP (CSDE): https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/CreditMMA.pdf.
- Crediting Deli Meats in the NSLP and SBP (CSDE): https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/Creditdeli.pdf
- Crediting Tofu and Tofu Products in the NSLP and SBP (CSDE): https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/CreditTofu.pdf
- Meal Patterns for Grades K-12 in School Nutrition Programs (CSDE webpage): https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-School-Nutrition-Programs
- Meal Patterns for Preschoolers in School Nutrition Programs (CSDE webpage): https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-Preschoolers-in-School-Nutrition-Programs/Documents
- Menu Planning Guide for Preschoolers in the NSLP, SBP, and ASP (CSDE): https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Preschool/MPGpreschool.pdf
- Menu Planning Guide for School Meals for Grades K-12 (CSDE): https://portal.ct.gov/SDE/Nutrition/Menu-Planning-Guide-for-School-Meals

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- Product Formulation Statement for Meat/Meat Alternates (USDA): https://fns-prod.azureedge.net/sites/default/files/resourcefiles/PFS_Documenting_Meat_Meat_Alternate_Nov_2019.pdf
- Product Formulation Statements (CSDE): https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/PFS.pdf
- Questions and Answers on Alternate Protein Products (APP) (USDA): https://www.fns.usda.gov/questions-and-answers-alternate-protein-products-app
- Reviewer's Checklist for Evaluating Manufacturer Product Formulation Statements for Meat/Meat Alternates (USDA): https://fns-prod.azureedge.net/sites/default/files/reviewer_checklist.pdf
- Tips for Evaluating a Manufacturer's Product Formulation Statement (USDA): https://fns-prod.azureedge.net/sites/default/files/resourcefiles/manufacturerPFStipsheet.pdf
- USDA Memo SP 24-2019, CACFP 11-2019 and SFSP 10-2019: Crediting Surimi Seafood in the Child Nutrition Programs: https://www.fns.usda.gov/school-meals/crediting-surimi-seafood-child-nutrition-programs
- USDA Memo SP 25-2019, CACFP 12-2019 and SFSP 11-2019: Crediting Tempeh in the Child Nutrition Programs: https://www.fns.usda.gov/school-meals/crediting-tempeh-child-nutrition-programs

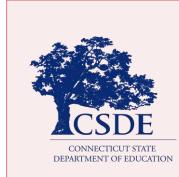
USDA Memo SP 53-2016 and CACFP 21- 2016: Crediting Tofu and Soy Yogurt Products in the School Meal Programs and the CACFP:

http://www.fns.usda.gov/crediting-tofu-and-soy-yogurt-products-school-meal-programs-and-cacfp

USDA Webinar: Additional Meat/Meat Alternate Options for CNPs: Crediting Tempeh and Surimi:

https://www.fns.usda.gov/tn/additional-meat-meat-alternate-tempeh-and-surimi

Requirements for Alternate Protein Products in the NSLP and SBP



For more information, review the CSDE's guides, *Menu Planning Guide* for School Meals for Grades K-12, Menu Planning Guide for Preschoolers in the NSLP, SBP, and ASP, and Afterschool Snack Program Handbook, or contact the school nutrition programs staff in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This document is available at https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/APPReq.pdf.

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- mail: U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

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