

Commissioner's Memo  
8/8/2017

## Flexibility for Co-Mingled Preschool Meals; Questions and Answers

### Memo Information

Memo Number **CNU-18-005**

Memo Date 8/8/2017

Memo Type Informational

Unit Child Nutrition

Regulatory Authority Healthy Hunger- Free Kids Act of 2010 and 7 CFR 210.10 and 220.8

Response Required NO

Attention Superintendents; Principals

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### Memo Text

**ATTENTION: CO-OP DIRECTORS, CHILD NUTRITION DIRECTORS, CHILD NUTRITION MANAGERS, PRE-SCHOOL DIRECTORS**

This memorandum provides guidance on meals served to preschoolers when they are in the same service area at the same time as grade K-5 students, and it includes Questions and Answers.

On April 25, 2016, the U.S. Department of Agriculture's Food and Nutrition Service (FNS) published the final rule "Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010" (81 FR 24348) to update the School Meal Programs' meal pattern requirements for infants and preschoolers under parts 7 CFR 210.10 and 220.8. Schools serving meals to infants and children ages 1 through 4 years old (preschoolers) must comply with these updated meal pattern requirements no later than October 1, 2017.

FNS recognizes that there are districts that serve pre-school students and K-5 students as co-mingled groups. FNS further recognizes that this could cause difficulty with meal counting and claiming requirements.

The co-mingled group is defined as a feeding group in which pre-K students and K-5 students are fed in the same location at the same time. When the pre-K students have their own designated seating area this is not considered co-mingling since the groups are seated separately.

It is clear from stakeholder feedback that it is in the best interest of the Child Nutrition Programs (CNP) to allow single menu flexibility when pre-K and K-5 students are co-mingled. This will help reduce administrative burdens and ensure integrity of the CNPs.

Therefore, schools that serve meals to pre-K and K-5 students in the same service area at the same time, and have no way to separate their seating, may choose to follow the grade-appropriate meal patterns for each grade group, or serve the K-5 meal pattern under parts 7 CFR 210.10 and 220.8 to both grade groups.

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\_This flexibility does not include the K-8 or K-12 breakfast menu planning options. It is only for Pre-K and K-5 menu planning options. SFAs must be aware that they are not to serve items that are prohibited by the new Child and Adult Care Feeding Program (CACFP) meal pattern to the pre-K students, **e.g. milk is the required component, not chocolate milk**. Although flavored milk is allowed in the K-5 meal pattern it is specifically prohibited in the CACFP meal pattern. It is the responsibility of SFAs and menu planners to introduce healthy food items to small children and maintain program integrity.

Although FNS is providing this flexibility, SFAs must work to find ways to serve grade-appropriate meals to pre-K and K-5 students to best address their nutritional needs. School food authorities should contact ADE Child Nutrition for possible solutions to enable them to serve students their grade-appropriate meal pattern prior to using this single menu flexibility. Some best practices to avoid co-mingling situations include serving breakfast in the classroom or staggering the meal service time for pre-K and K-5 students.

During the transition period (School Year 2017-2018), Arkansas Department of Education Child Nutrition will provide technical assistance to SFAs who are facing the challenges.

If you have questions regarding this flexibility please email your area specialist or call them at 501-324-9502.

Attachments:

SP 37-2017

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## Attachments

- [CNU-18-005--SP37-2017\\_Flexibility\\_for\\_Co-Mingled\\_Preschool\\_Meals-\\_Q\\_and\\_As.pdf](#)