average minimum. Grains/breads is the least expensive food component on a per serving basis, averaging 3.2 cents per serving.

In summary, compared to the current meal pattern minimums, the proposed food-based menu system holds milk and meat/meat alternate constant and requires an increase in the minimum grains/breads and vegetables/fruits, but does not require an increase on average over current serving practices except for 0.5 servings of bread per week.

TABLE 3.—DIFFERENCE BETWEEN ACTUAL NSLP FOOD AND THE HIGHEST MINIMUM REQUIREMENTS OF THE CURRENT MEAL PATTERN

Food component	Largest quantity required by cur- rent NSLP meal pattern	Esti- mated aver- age amount in NSLP meals, school year 1991– 92	Dif- ference (actual minus required)
Meat/Meat Al- ternate (oz.).	2.0	2.8	+0.8
Vegetables/ Fruits (cups).	.75	1.0	+0.25
Grains/ Breads (average	1.6	2.5	+0.9
servings per day). Milk (as a beverage) (oz.).	8.0	7.5	1 – 0.5

¹ Probably not zero due to OVS effect.

TABLE 4.—DIFFERENCE BETWEEN ACTUAL NSLP FOOD AND THE HIGHEST MINIMUM REQUIREMENTS OF THE PROPOSED FOOD-BASED MENU SYSTEM

Food compo- nent	Largest quan- tity re- quired by pro- posed NSLP food- based menu system	Esti- mated aver- age amount in NSLP meals, school year 1991– 92	Dif- ference (actual minus pro- posed)
Meat/Meat Alternate (oz.). Vegetables/ Fruits (cups).	2.0	2.8	+0.8
	1.0	1.0	no dif- fer- ence

TABLE 4.—DIFFERENCE BETWEEN ACTUAL NSLP FOOD AND THE HIGHEST MINIMUM REQUIREMENTS OF THE PROPOSED FOOD-BASED MENU SYSTEM—Continued

Food component	Largest quan- tity re- quired by pro- posed NSLP food- based menu system	Esti- mated aver- age amount in NSLP meals, school year 1991– 92	Dif- ference (actual minus pro- posed)
Grains/Breads (average servings per	3.0	2.5	-0.5
day). Milk (as a bev- erage) (oz.).	8.0	7.5	- 0.5 ¹

¹ Probably not zero due to OVS effect.

Reanalysis of Market Impact Scenarios

The three scenarios for potential market impacts described in the June 10, 1994 proposal were reanalyzed, incorporating the extended data on food component crediting. These three example market impact scenarios were developed using a model that constrained NSLP food cost to remain at the average per meal cost level determined by the School Lunch and Breakfast Cost Study and meet the proposed nutrient targets. The first scenario minimized change from current eating choices for specific commodities, but allows substitution among the 52 food groups. The second scenario is the same as the first, but demonstrates the effect of shifting all chicken to lower fat chicken to show how change in preparation or commercial availability can affect a particular commodity. The third scenario required that there be no change in the total quantities of the various major commodities used (except for butter), and tended to increase the relative use of the lower fat versions of the commodities (e.g., lower fat pork such as ham instead of ribs or bacon). In addition, the extended school lunch model was used to determine the average food cost for each of the four food components. The following describes the findings from these analyses.

Table 5 shows the results of applying the NSLP crediting rules to the three impact scenarios. The quantities shown in table 5 are daily averages across all grades K-12.

Meat/Meat Alternate

The proposed average minimum servings of meat/meat alternate is not

met in Scenario 1, but is exceeded in Scenarios 2 and 3. Scenario 1 provides 1.9 ounces of meat/meat alternate. which is not sufficient to meet the 2 ounces minimum requirement for grades K-6 and 7-12. This scenario was developed to show the effect of minimizing the change in current food offerings (e.g., trying to maintain the percentage of meat/meat alternate from lower fat chicken and higher fat chicken). Since the grades K-3 meat/ meat alternate requirement is 1.5 ounces, the actual average minimum requirement for grades K-12 will be slightly less than 2.0 ounces. However, at least 20 percent of the school meals would need to be provided using the K-3 pattern for the overall average minimum requirement to be 1.9 ounces. While more than 20 percent of all NSLP meals are served to children in grades K-3, for administrative efficiency these are often served using the meal pattern for older students, so the overall average minimum requirement is likely to be above 1.9 ounces.

Grains/breads

The proposed average grains/breads minimum servings is met or exceeded by all three scenarios. All three scenarios exceed the minimum requirement for grains/breads for grades K-6. Scenarios 1 and 2 also exceed the minimum requirement for grades 7–12. Scenario 3 provides 2.6 servings of grains/breads, which as discussed above, is equal to the overall weighted average proposed minimum for grains/breads.

Vegetables/fruits

The proposed average vegetables/ fruits minimum servings is met or exceeded by all three scenarios. Scenarios 2 and 3, which allow for somewhat larger shifts in food preparation methods, provide more than the largest minimum requirement of the proposed food-based menu systems except for vegetables/fruits in scenario 3. The amount of vegetables/fruits in scenario 3, 0.9 cups, exceeds the amount required for grades K-6 (average 0.85 cups per day), and is approximately equal to the expected average minimum requirement across all NSLP meals. Over 60 percent of the meals are served to students in grades K-6, and some of these will be served in schools using the grades K-3 pattern, which requires only 0.75 cups vegetables/fruits, so the overall average minimum requirement across all NSLP meals is approximately 0.9 cups.