

Food and Nutrition Service	DATE:	September 9, 2016
Park Office Center	MEMO CODE:	CACFP 25-2016
3101 Park Center Drive Alexandria VA 22302	SUBJECT:	Vegetable and Fruit Requirements in the Child and Adult Care Food Program; Questions and Answers
	TO:	Regional Directors Special Nutrition Programs All Regions
		State Directors Child Nutrition Programs All States

This memorandum explains the vegetable and fruit requirements in the Child and Adult Care Food Program (CACFP) and includes Questions and Answers.

Background

The Healthy, Hunger-Free Kids Act of 2010, Public Law 111-296, amended section 17 of the Richard B. Russell National School Lunch Act (NSLA), 42 U.S.C. 1766, to require the U.S. Department of Agriculture to update the CACFP meal pattern requirements to make them consistent with (a) the most recent version of the *Dietary Guidelines for Americans*, (b) the most recent relevant nutrition science, and (c) appropriate authoritative scientific agency and organization recommendations. On April 25, 2016 USDA'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* (81 FR 24348), to update the CACFP meal patterns in 7 CFR 226.20. This final rule updated the meal pattern requirements for centers and day care homes participating in CACFP.

This memorandum explains the vegetable and fruit requirements established in the final rule, including the requirements in the infant meal patterns and the child and adult meal patterns. CACFP centers and day care homes must comply with these requirements no later than October 1, 2017. Meals that meet the current CACFP meal pattern requirements may not be disallowed until the updated meal pattern requirements take effect on October 1, 2017. For information on implementing the updated meal patterns prior to the effective date, please refer to the memorandum CACFP 14-2016, *Early Implementation of the New Child and Adult Care Food Program Meal Pattern Requirements* (http://www.fns.usda.gov/early-implementation-updated-cacfp-meal-pattern-requirements-and-nslp-and-sbp-infant-and-preschool).

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I. INFANT MEAL PATTERN

Vegetables and Fruit

The updated CACFP infant meal pattern requires that centers and day care homes serve vegetables and fruit (cooked, mashed, or pureed, as needed to obtain the appropriate texture and consistency) at snack for infants age 6 through 11 months old, if the infant is developmentally ready to accept them. This requirement was developed in an effort to help young children establish healthy eating habits as early as possible. Recent studies have found that dietary habits are fairly established by two years of age and that a substantial proportion of infants do not consume any vegetables and fruit in a given day. The American Academy of Pediatrics recommends serving infants a variety of foods, including an increased amount of vegetables and fruits.

Juice

Starting October 1, 2017, the updated infant CACFP meal pattern also prohibits child care centers and day care homes from providing juice to infants as part a reimbursable meal. This prohibition is consistent with the recommendations of the National Academy of Medicine and American Heart Association of no juice before the age of one.

For more information on the entire infant meal pattern, please refer to the memorandum CACFP 23-2016, *Infant Feeding and Meal Pattern Requirements in the Child and Adult Care Food Program; Questions and Answers* (http://www.fns.usda.gov/sites/default/files/cn/CACFP23_2016os.pdf).

II. CHILD AND ADULT MEAL PATTERN

Separate Vegetable and Fruit Components

Vegetables and fruits prepared without added solid fats, added sugars, refined starches, and sodium are nutrient-dense foods and, according to the Dietary Guidelines, are under consumed by Americans. In the updated CACFP meal pattern, there is now a separate vegetable component and fruit component at lunch, supper, and snack. This change means children and adults are offered a serving of vegetables <u>and</u> a serving of fruit at lunch and supper. In addition, a snack with a vegetable and fruit in the appropriate minimum serving sizes is now reimbursable. Separate vegetable and fruit components will help increase the variety of vegetables and fruits served and consumed by children and adults.

To increase flexibility in menu planning, centers and day care homes may choose to serve two vegetables at lunch and supper, rather than a serving of vegetables and a serving of fruit. This means that the fruit component at lunch and supper may be substituted by an additional vegetable. The substituted vegetable must be at least the same serving size as the fruit component it replaced. To be consistent with the Dietary Guidelines' recommendation that all Americans should eat a variety of vegetables, when two vegetables are served at Regional Directors State Directors Page 3

lunch or supper, they must be two different kinds of vegetables. Please note that vegetables do not need to be from different vegetable subgroups (e.g., dark green vegetables, red and orange vegetables, starchy vegetables, beans and peas (legumes), or other vegetables). See the table below for examples of reimbursable lunch or supper meals featuring a fruit and a vegetable, or two vegetables, in lieu of fruit. Centers and day care homes cannot serve two fruits at lunch or supper meals under the updated meal patterns.

Required components	Sample menu, fruit and vegetable (Ages 3-5)	Sample menu, two vegetables (Ages 3-5)	Sample menu, fruit and vegetable (Ages 6-12)	Sample Menu, two vegetables (Ages 6-12)
Meat/meat alternates	1.5 oz. chicken salad	1.5 oz. chicken salad	2 oz. chicken salad	2 oz. chicken salad
Vegetables	¹ / ₄ cup green beans	¹ / ₄ cup cauliflower	¹ ⁄ ₂ cup broccoli	¹ / ₂ cup sweet potato
Fruit	¹ / ₄ cup diced peaches	¹ / ₄ cup carrots	¹ / ₄ cup apple slices	¹ ⁄4 cup zucchini
Grain	¹ / ₂ whole wheat pita	¹ / ₂ whole wheat pita	1 whole wheat pita	1 whole wheat pita
Milk	³ / ₄ cup unflavored, low-fat milk	³ / ₄ cup unflavored, low-fat milk	1 cup unflavored, low-fat milk	1 cup unflavored, low-fat milk

Along with granting the menu planner greater flexibility, allowing centers and day care homes to serve two different vegetables at lunch and supper meals will help increase children and adults' exposure to and consumption of vegetables. The Dietary Guidelines found that few young children and adults consume the recommended amount of vegetables, while the majority of young children meet the recommended intake for fruit.

Consistent with the School Breakfast Program, vegetables and fruit are combined into one component at breakfast meals. Centers and day care homes can continue to serve vegetables, fruits, or a combination of both at breakfast.

Juice

Under the updated children and adult meal patterns, fruit juice or vegetable juice may only be used to meet the vegetable or fruit requirement at one meal or snack per day. This limitation is based on the Dietary Guidelines' recommendation that at least half of the fruits consumed per day should come from whole fruits (fresh, canned, frozen, or dried). While 100 percent juice can be part of a healthful diet, it lacks the dietary fiber found in whole fruits and vegetables and when consumed in excess can contribute to extra calories. If a center or day care home serves fruit or vegetable juice at more than one meal (including snack), the meal with the lowest reimbursement rate containing juice would be disallowed. Regional Directors State Directors Page 4

State agencies are reminded to distribute this information to Program operators immediately. Program operators should direct any questions regarding this memorandum to the appropriate State agency. State agency contact information is available at http://www.fns.usda.gov/cnd/Contacts/StateDirectory.htm. State agencies should direct questions to the appropriate FNS Regional Office.

Original Signed

Angela Kline Director Policy and Program Development Division Child Nutrition Programs

Attachment

Questions and Answers

1. What type of "whole" vegetable or fruit would be appropriate for infants aged 6 through 11 months?

It is essential for child care providers and parents or guardians to communicate regularly about the readiness of an infant to accept solid foods. Clear communication will help providers choose the specific foods to introduce and facilitate consistency between the home and child care setting during this period of rapid change. Once an infant is developmentally ready to accept solid foods, some examples of vegetables and fruit that can be served include:

- Commercially prepared baby food such as: green beans, green peas, squash, sweet potatoes, carrots, beets, spinach, applesauce, apricots, bananas, peaches, pears, and plums.
- Home-prepared vegetables (cooked and processed to the appropriate texture), such as: asparagus, avocado, broccoli, cabbage, cauliflower, green beans, green peas, kohlrabi, plantain, potatoes, summer or winter squash, and sweet potatoes.
- Home-prepared fruits (which can be mashed after peeling if ripe and soft) such as: apricots, bananas, cantaloupe, mango, melon, nectarines, papaya, peaches, pears, and plums.

The term "whole" refers to all fresh, frozen, canned, and dried fruits and vegetables, rather than juice. For infants consuming solid foods, these whole vegetables and fruits must be cooked and processed as needed to the appropriate texture for their developmental stage. More guidance is available in *Feeding Infants: A Guide for Use in the Child Nutrition Programs* (http://www.fns.usda.gov/tn/feeding-infants-guide-use-child-nutrition-programs).

2. Can two servings of broccoli be served at lunch to fulfill the vegetable component and fruit component?

No, two servings of broccoli to meet the vegetable component and fruit component would not be reimbursable under the updated lunch and supper child and adult meal patterns. While centers and day care homes may serve two servings of vegetables at lunch and supper, the two servings of vegetables must be different. This is designed to be consistent with the Dietary Guidelines recommendation that all Americans should consume a variety of vegetables.

The two servings of vegetables do not need to be from different subgroups (e.g., dark green vegetables, red and orange vegetables, starchy vegetables, beans and peas (legumes), or other vegetables). For example, a lunch or dinner with a serving of carrots and a serving of red peppers (both red and orange vegetables) would be allowable. Although serving vegetables from different subgroups is not a requirement

in CACFP, offering a variety of vegetables can help improve the overall nutritional quality of the meals served to participants.

3. Is a tomato a fruit or vegetable? What about avocado?

Both tomatoes and avocados are considered vegetables. CACFP centers and day care homes can refer to the *Food Buying Guide for School Meal Programs* (http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs), which provides a list of creditable vegetables and a list of creditable fruit. This guide is currently being revised to include CACFP and the Summer Food Service Program so that there will be one Food Buying Guide for all Child Nutrition Programs. While the Food Buying Guide provides a relatively comprehensive list of foods commonly served in Child Nutrition Programs, it does not include information on every possible vegetable or fruit that can be part of a reimbursable meal.

CACFP centers and day care homes may also reference ChooseMyPlate.gov to determine if a food is a vegetable or a fruit. The website includes a list of vegetables, including vegetable subgroups, and a list of fruits. CACFP centers and homes should work with their sponsor or State agency, as appropriate, when they have questions about the crediting of foods.

4. How do raw leafy greens contribute to the vegetable component? Similarly, how does dried fruit contribute to the fruit component?

One cup of leafy greens (e.g., lettuce, raw spinach, etc.) counts as ½ cup of vegetables and ¼ cup dried fruit counts as ½ cup of fruit under the updated CACFP meal patterns, which go into effect on October 1, 2017. This is consistent with the National School Lunch and School Breakfast Programs.

5. With separate vegetable and fruit components at lunch, supper, and snack in the updated CACFP meal patterns, how do food items that are mixtures of vegetables and fruit, such as a carrot-raisin salad, credit?

Food items that are mixtures of vegetables and fruits, such as a carrot-raisin salad, can only credit towards the vegetable component <u>or</u> the fruit component, not both, at lunch, supper, and snack. For a mixed food item to credit towards the vegetable component or fruit component, it must contain at least ¹/₈ cup vegetable or fruit per serving.

6. May food ingredients that are unrecognizable contribute to meal pattern requirements (for example, carrots pureed in a sauce for Macaroni and Cheese)?

Pureed vegetables or fruits may contribute to the CACFP meal pattern requirements as long as the dish also provides an adequate amount (1/8 cup) of recognizable, creditable fruits or vegetables. If the dish does not contain at least 1/8 cup of a

recognizable component then the blended foods do not contribute to the meal requirements. Therefore, in the carrots and mac and cheese scenario, the pureed or mashed carrots can count towards the vegetable/fruit component if there is at least ¹/₈ cup of another recognizable vegetable or fruit in the dish. FNS requires an adequate amount of recognizable fruits or vegetables because meals served in the Child Nutrition Programs are a nutrition education opportunity to help children learn how to build a healthy plate. It is important for young children to be able to identify the components in a healthy meal.

7. How should vegetables, fruits, or other foods not listed in the Food Buying Guide be credited?

Foods not listed in the Food Buying Guide may be served in CACFP. If a food is served as part of a reimbursable meal, but not listed in the Food Buying Guide, the yield information of a similar food or in-house yield may be used to determine the contribution towards meal pattern requirements, with State agency approval. Instructions for developing yields are available in the introduction section of the Food Buying Guide, page I-3

(<u>http://www.fns.usda.gov/sites/default/files/FBG_introduction_0.pdf</u>). Additional information on how foods may contribute towards a reimbursable meal is available in memorandum TA 01-2015, *Child Nutrition Programs and Traditional Foods* (<u>http://www.fns.usda.gov/sites/default/files/TA01-</u>2015 Child Nutrition Programs and Traditional Foods.pdf).

8. What meal would be disallowed if a center provides juice at lunch and snack?

If juice is served more than once per day, the meal with the lowest reimbursement rate in which juice was served is disallowed. In this example, snack would be disallowed because it is the meal with the lower reimbursement rate.

9. Can a 100 percent fruit and vegetable juice blend be served to fulfill both the vegetable component and the fruit component?

One hundred percent fruit and vegetables juice blends are allowable in CACFP, but they cannot fulfill both the vegetable component and fruit component in the same meal. Similar to the National School Lunch and School Breakfast Programs, a 100 percent fruit and vegetable blend may contribute to the fruit component when fruit juice or puree is the most prominent ingredient; and a 100 percent fruit and vegetable blend may contribute to the vegetable juice or puree is the most prominent ingredient. Keep in mind that fruit or vegetable juice may not be served to infants and may only be served once per day to children 1 year old and older and adults.