



Food and
Nutrition
Service

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Park Office
Center

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Subject: Update of Food Crediting in the Child Nutrition Programs

To: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

This memorandum informs stakeholders on the progress made by the Food and Nutrition Service (FNS) in updating the food crediting system for all Child Nutrition Programs (CNP), including the National School Lunch Program, School Breakfast Program, Child and Adult Care Food Program, and Summer Food Service Program. This is a first step by FNS towards improving the CNP crediting system to best address today's evolving food and nutrition environment and meet the needs of those operating and benefiting from the CNPs. Under the Richard B. Russell National School Lunch Act, the nutritional requirements for the CNPs must be consistent with the goals of the Dietary Guidelines for Americans and consider the nutrient needs of food insecure children (42 U.S.C. 1758(f)(1)). FNS developed the CNP meal patterns based on these requirements. Crediting guidelines specify how individual food items contribute to the CNP meal patterns. Crediting information is conveyed through technical assistance materials, such as the *Food Buying Guide for Child Nutrition Programs*: <https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>.

In December 2017, FNS solicited comments on the CNP crediting system through a Request for Information (RFI). FNS sought public input about specific foods of interest to stakeholders and asked for recommendations to make crediting more simple, fair, and transparent. The public comment period closed April 23, 2018; FNS received a total of 437 comments. A majority of the comments came from CNP operators and individuals. Comments were also submitted by the food industry, advocacy organizations, and State agencies. All comments are available for review at <https://www.regulations.gov/docket?D=FNS-2017-0044>.

Crediting Shelf-Stable, Dried and Semi-Dried Meat, Poultry, and Seafood Snacks

In the RFI, FNS asked for public input on whether shelf-stable, dried and semi-dried meat, poultry, and seafood snacks (such as beef jerky or summer sausage) should credit as meat in the CNPs. Commenters were also invited to provide input on a crediting method for dried meat snacks, and to share their ideas for how these products could be incorporated into a reimbursable meal or snack. Previously, dried meat snacks were not creditable in the Programs.

Commenters suggested that dried meat snacks could fit a specific need in CNPs. Most commenters in favor of crediting dried meat snacks suggested these products would be most useful in meals served off-site, for example, during school field trips or picnics. These products also may be useful for summer meals, which are often served at outdoor and non-traditional sites that lack access to refrigeration and require shelf-stable, grab-and-go options. Some operators reported they are already serving dried meat as an extra in the Summer Food Service Program or in sack lunches during the school year.

Based on these comments and the potential benefits of crediting shelf-stable, dried and semi-dried meat, poultry, and seafood snacks, FNS will now allow these products to credit towards the meat component in a reimbursable meal or snack. Dried meat products may now be used throughout the CNPs as part of reimbursable meals or snacks at the discretion of the Program operators. In order to simplify meal planning for operators, use of the products is not limited to meals and snacks served off-site. To credit these products, Program operators will follow the crediting principles used for all other products made from meat, poultry, or seafood. For more information, see the *Food Buying Guide* for CNPs at <https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>, and the *Manufacturer's Product Formulation Statement* section of the CN Labeling Program website at <https://www.fns.usda.gov/cnlabeling/food-manufacturersindustry>.

With the issuance of this memorandum, FNS is rescinding *TA 05-2011: Shelf-stable, Dried Snacks Made from Meat, Poultry, or Seafood*, which previously stated that these items were not creditable in the CNPs. This memorandum supersedes the guidance provided in TA 05-2011, dated June 15, 2011, and revised on June 22, 2011.

Additional Crediting Guidance

As part of the Agency's ongoing effort to simplify menu planning, expand food choices, and incentivize participation in the CNPs, FNS will allow Program operators to credit the following food items that have not previously contributed to the CNP meal pattern requirements: coconut, hominy, popcorn, surimi seafood, and tempeh. RFI commenters voiced their support for allowing many of these products to credit as part of a

Regional Directors

State Directors

Page 3

reimbursable meal, while others offered more general suggestions to simplify food crediting and reduce burden for operators. Allowing these products to credit is intended to provide additional variety and enhance the appeal of meals. FNS will issue new guidance soon describing how these products will credit towards specific food components in the CNP meal patterns. FNS will also publish new guidance to allow crediting vegetables disguised as other food components or not provided in traditional forms, for example, noodles or pasta made from vegetables, including legumes.

In addition, FNS received several comments on crediting of bacon. As a reminder, turkey bacon is creditable. FNS also encourages industry to continue to innovate and develop products that are nutritious and appealing to children and meet the needs of the CNPs.

Looking ahead, FNS is committed to finding new ways to reduce administrative burden for Program operators and ensure that children have access to a wide array of nutritious food choices. Staying up to date with the evolving food environment through ongoing conversations with stakeholders will help FNS learn about additional food options that could improve Program menus. With this in mind, FNS welcomes input regarding any future changes that may enhance flexibility and expand the options available to Program operators working hard to build meals that children enjoy.

State agencies are reminded to distribute this memorandum to Program operators. Program operators should direct any questions concerning this guidance to their State agency. State agencies with questions should contact the appropriate FNS Regional Office.

A handwritten signature in dark ink, appearing to read "Angela Kline". The signature is fluid and cursive, with the first name "Angela" written in a larger, more prominent script than the last name "Kline".

Angela Kline

Director,

Policy and Program Development Division