



Food and
Nutrition
Service

Date: April 17, 2019

Park Office
Center

Memo Code: SP 26-2019, CACFP 13-2019, SFSP 12-2019

3101 Park
Center Drive
Alexandria
VA 22302

Subject: Crediting Pasta Products Made of Vegetable Flour in the Child Nutrition Programs

To: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

This memorandum expands flexibility for crediting vegetables in the Child Nutrition Programs (CNP), including the National School Lunch Program (NSLP), School Breakfast Program (SBP), Child and Adult Care Food Program (CACFP), and Summer Food Service Program (SFSP). In December 2017, FNS solicited comments on the CNP crediting system through a Request for Information (RFI). FNS sought public input about specific foods, including if it is appropriate to require visual recognition when determining how foods credit in the CNPs. At the time of the public comment, Program operators could credit pasta made with vegetable flour only if it was served along with a recognizable vegetable. For example, bean pasta could credit as a vegetable if it was served with additional beans.

Many stakeholders commented on the important role CNPs play in providing nutrition education to children. They noted that meals and snacks served in the CNPs are teaching tools for children and visually demonstrate how to build a healthy, balanced meal. However, some commenters described the visual recognition requirement as a barrier to creativity, and suggested that pasta products made of vegetable flours are an innovative way to offer vegetables in a food item that is popular with children. The full stakeholder comments are available at: <https://www.regulations.gov/docket?D=FNS-2017-0044>.

In response to stakeholder comments, and to expand Program operator options for offering vegetables to children, **the Food and Nutrition Service (FNS) now allows pasta made of vegetable flour(s) to credit as a vegetable, even if the pasta is not served with another recognizable vegetable.** Whole vegetables cut into “noodles” or spirals, such as spiralized zucchini or sweet potatoes, continue to credit toward the respective vegetable subgroups based on the volume served.

Pasta Products Made of 100 Percent Vegetable Flour(s) Crediting as a Vegetable

Pasta products made of one or more vegetable flour(s) may credit toward the vegetable requirements. **Consistent with vegetable crediting, ½ cup of pasta made of 100 percent vegetable flour(s) credits as ½ cup of vegetables.**

Pasta Products Made of Vegetable Flour(s) from One Vegetable Subgroup

Pasta products made of flour(s) from one vegetable subgroup may credit toward the appropriate vegetable subgroup. For example, pasta made of 100 percent red lentil flour credits toward the weekly ½ cup legumes requirement.

Pasta Products Made of Vegetable Flours from Multiple Vegetable Subgroups

Pasta products made of a blend of 100 percent vegetable flours from multiple vegetable subgroups (e.g., lentils and cauliflower) may credit in two ways:

- (1) With a Product Formulation Statement from the food manufacturer detailing the actual volume of each vegetable per serving, the pasta product may credit toward specific vegetable subgroups; or
- (2) If the actual volume of each vegetable flour is unknown, the pasta product may credit toward the additional vegetables needed from any vegetable subgroup to meet the overall weekly vegetable requirements.

Pasta Products Made of Vegetable Flour(s) and Other Non-Vegetable Ingredients

Consistent with existing policy, pasta products made of vegetable flour and other non-vegetable ingredients may credit toward daily and weekly vegetable requirements (or, in the case of legumes, meat/meat alternate requirements) with a Product Formulation Statement detailing the actual volume of vegetable flour per serving.

This crediting does not apply to grain-based pasta products that contain small amounts of vegetable powder for color (e.g., spinach, sun-dried tomato).

Pasta Products Made of 100 Percent Legume Flour(s) Crediting as a Meat Alternate

The crediting change discussed above aims to increase options for local Program operators to meet vegetable requirements; therefore, this crediting change does not remove the visual recognition requirement for legume pasta crediting toward the meat/meat alternate component.

Consistent with legumes crediting, **½ cup of cooked pasta made of 100 percent legume flour(s) may credit as 2 ounce equivalents of meat alternate. To credit as a meat alternate, pasta made of legume flour(s) must be offered with additional meat/meat alternate, such as tofu, cheese, or meat.** At the discretion of local menu planners, legumes may credit as a vegetable or a meat alternate, but not as both in the same meal [7 CFR 210.10(c)(2)(i)(F)(iii)].

Alternatively, manufacturers and Program operators may credit legume flour pasta using the Bean Flour yield information on page C-1 of Appendix C found at https://foodbuyingguide.fns.usda.gov/files/Reports/USDA_FBG_FoodItemsForFurtherProcessing_YieldTable.pdf, and by using the crediting principles detailed in the *Manufacturer's Product Formulation Statement* (PFS) section of the CN Labeling Program website at <https://www.fns.usda.gov/cnlabeling/food-manufacturersindustry>.

Required Signage and Training

Commenters noted that nutrition education, including signs in cafeterias and/or other meal service areas, help children understand what foods are in their meals and snacks. To support this effort, local Program operators must indicate – using signs or other nutrition education – that pasta made of vegetable flour is a “vegetable” and not a grain component of the meal. For example, pasta made of chickpea flour could be labeled as “Chickpea Pasta” with a symbol showing it to be part of the vegetable component of the meal. FNS encourages Program operators to offer vegetables in a variety of ways on the menu and to educate children about vegetables from farm to plate. Additionally, it is critical that local Program operators are trained to recognize a reimbursable meal. Serving line staff should be informed when pasta made with vegetable flour is offered and understand how the pasta contributes toward the reimbursable meal.

FNS remains committed to simplifying menu planning for all CNP operators, promoting the efficient use of Program funds, and ensuring menu planners and participants have a wide variety of nutritious food choices. We recognize that crediting decisions have an impact on schools, child care centers, adult day care centers, day care homes, the food industry, and most importantly, participating children and adults. The agency is committed to staying up-to-date with the evolving food and nutrition environment through continued engagement with a variety of stakeholders.

The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

Regional and State Directors

Through these efforts, FNS will work to maximize the availability of wholesome food options while minimizing administrative burden in the CNPs.

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.

Original Signed

Angela M. Kline
Director,
Policy and Program Development Division

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