# Department of Health and Human Services <br> Division of Public Health 

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## Memorandum

To: Institutions Participating in the Child and Adult Care Food Program
From: Annette Cowan, Head
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Subject: Vegetable and Fruit Requirements in the Child and Adult Care Food Program: Questions and Answers

This memorandum explains the vegetable and fruit requirements in the Child and Adult Care Food Program (CACFP) and includes Questions and Answers. This revision amends the policy for crediting mixtures of vegetables and fruits to allow them to count towards both the vegetable component and the fruit component in the Question and Answers section. This revision also includes new Questions and Answers.

## Background

The updated vegetable and fruit requirements for the infant, children, and adult meal patterns established under 7 CFR 226.20 (a) and (b) are explained in this memorandum. 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 (https://www.fns.usda.gov/sites/default/files/cn/SP42_CACFP14 20160s.pdf ).

## 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 breakfast, lunch, supper and snack for infants age 6 through 11 months old, if the infant is developmentally ready to accept them. Adding vegetables and fruits to the updated snack meal pattern for older infants was included to help young children establish healthy eating habits as early as possible. Recent studies have found that dietary habits are fairly well 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 of 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 062017, Feeding Infants and Meal Pattern Requirements in the Child and Adult Care Food Program; Questions and Answers (https://www.fns.usda.gov/sites/default/files/cacfp/CACFP06-2017os.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 for Americans (Dietary Guidelines), are under consumed by Americans. In the updated CACFP meal patterns, 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 and a serving of fruit at lunch and supper. In addition, a snack with a vegetable and fruit in the appropriate minimum serving sizes is 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 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 612) | Sample Menu, two vegetables (Ages 6-12) |
| :---: | :---: | :---: | :---: | :---: |
| Meat/meat alternates | $1.5 \mathrm{oz}$ chicken salad | 1.5 oz . chicken salad | $2 \mathrm{oz} .$ <br> chicken salad | 2 oz. chicken salad |
| Vegetables | 1/4 cup green beans | 1/4 cup cauliflower | $\begin{aligned} & 1 / 2 \text { cup } \\ & \text { broccoli } \end{aligned}$ | 1/2 cup sweet potato |
| Fruit | $1 / 4$ cup diced peaches | $1 / 4$ cup carrots | $\begin{aligned} & \hline 1 / 4 \text { cup } \\ & \text { apple } \\ & \text { slices } \\ & \hline \end{aligned}$ | $1 / 4$ 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 one combined 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 child 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. Please see the Questions and Answers in the Attached for examples.

If you have questions, please contact your regional consultant.

## Attachment

## Questions and Answers

New or updated questions are preceded by three asterisks ( ${ }^{* * *}$ )

## 1. What type of "whole" vegetable or fruit would be appropriate for infants aged $\mathbf{6}$ through $\mathbf{1 1}$ 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. Providing two servings of broccoli to meet the vegetable component and fruit component is not 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 different servings of 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). For example, a lunch with a serving of carrots and a serving of red peppers (both in the red and orange vegetable subgroup) would be allowable.

As a best practice, CACFP centers and day care homes are encouraged to provide at least one serving of vegetables from each subgroup over the course of one week. Offering a variety of vegetables can help improve the overall nutritional quality of the meals and it increases the amount of vegetables participants are exposed to. To learn more about the CACFP meal pattern best practices, please see the memorandum CACFP 15-2016, Optional Best Practices to Further Improve Nutrition in the Child and Adult Care Food Program (https://www.fns.usda.gov/sites/default/files/cacfp/CACFP\ 15-2016os.pdf).

## 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 the 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 raw (uncooked) leafy greens (e.g., lettuce, spinach, etc.) counts as $1 / 2$ cup of vegetables and $1 / 4$ cup dried fruit counts as $1 / 2$ 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. ***Do leafy greens that are served cooked (such as collard greens) count as half the volume served?

No. Leafy greens that are served cooked credit as the volume served. For example, a $1 / 2$ cup of cooked collard greens credits as $1 / 2$ cup vegetables. Conversely, raw leafy greens count as half the volume served. For example, one cup of raw leafy greens (e.g. lettuce or raw spinach) counts as $1 / 2$ cup vegetables.
6. $* * *$ 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, may credit towards both the vegetable component and the fruit component if they contain at least $1 / 8$ cup vegetable and $1 / 8$ cup fruit per serving that are easily identifiable. For example, a carrot-raisin salad served to 6 years olds that contains $1 / 2$ cup carrots and $1 / 8$ cup raisins (credits as $1 / 4$ cup fruit) meets the full vegetable component and the full fruit component.

Similarly, vegetable mixtures may count towards the vegetable component and fruit component at lunch and supper if they contain at least $1 / 8$ cup of two different kinds of vegetables. This is because a vegetable can replace the fruit component at lunch and supper meals. For example, a center serves 6 year old children $1 / 2$ cup roasted broccoli and $1 / 4$ cup roasted cauliflower mixed together. The cauliflower is replacing the fruit component and meets the minimum serving size required for the fruit component for children 6-12 years old. However, if the quantities of the different vegetables are not known, such as frozen carrots and peas, the vegetable mixture counts as one serving of vegetables and cannot count towards the fruit component. Another vegetable or fruit would need to be served to fulfill the fruit component.
7. 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 per serving. If the dish does not contain at least $1 / 8$ cup of a recognizable component per serving 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 component if there is at least $1 / 8$ cup of another recognizable vegetable per serving. 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.

## 8. 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 the CACFP. If a food is served as part of a reimbursable meal, but it is 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 the 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 (http://www.fns.usda.gov/sites/default/files/FBG introduction 0.pdf). Additional information on how foods may contribute towards a reimbursable meal is available in memorandum TA 012015, Child Nutrition Programs and Traditional Foods (http://www.fns.usda.gov/sites/default/files/TA012015 Child Nutrition Programs_and_Traditional Foods.pdf).
9. ***If two servings of different beans and peas (legumes) are served during one meal, can one serving count as a vegetable and one serving as a meat alternate?

Yes. A CACFP center or day care home may offer two distinct servings of different beans and peas (legumes) in one meal and count one towards the vegetable component and one towards the meat/meat alternate component if they are in separate dishes. For example, legumes may be served as part of a salad (vegetable component) and as part of a chili or bean soup (meat/meat alternate component). Please note, when a meal contains one serving of beans and peas (legumes), it can only count towards the meat/meat alternate component or the vegetable component, and not both.
10. What meal would be disallowed if a center or day care home provides juice at lunch and snack under the child and adult meal patterns?

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. As a reminder, juice is not allowed under the infant meal pattern.

## 11. ${ }^{* * *}$ Can juice be served more than once per day outside of the reimbursable meal?

Yes. Juice may be served as an extra food item outside of the meal pattern. For example, if juice is served at breakfast, juice may be served as an extra item at snack (e.g., crackers, cheese, and juice (extra)). FNS encourages centers and day care homes to use their discretion when choosing to serve extra food items. While juice can be part of a healthful diet, it lacks the dietary fiber found in other forms of fruit and when consumed in excess can contribute to extra calories. Additionally, the Dietary Guidelines for Americans recommends that at least half of fruits consumed come from whole fruits. FNS further encourages CACFP centers and day care homes to be cost conscious when choosing to serve extra foods. Meals containing extra foods on top of the minimum required components receive the same reimbursement rate as regular CACFP meals.
12. 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 vegetable 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 component when vegetable juice or puree is the most prominent ingredient. Keep in mind that, in order for meals to be reimbursable, 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.
13. ${ }^{* * *}$ When a center or day care home serves a smoothie containing fruit and it contributes towards the fruit component of a meal or snack, does that count towards the juice limit?

Yes. Pureed vegetables and fruits (fresh, frozen, or canned) when served in a smoothie, credit as juice and, therefore, are subject to the limit on juice service.
14. ${ }^{* * *}$ If a center serves a morning snack to one group of children and an afternoon snack to a separate, different group of children, can juice be served at both of those snack services?

No. The limit on juice (at no more than one meal or snack per day) applies to the center or day care home, not to each individual child or adult participant. Therefore, if a center or day care home serves two different meals to two different groups of children or adults, only one meal may contain juice.
15. ***If a center serves one meal, such as lunch, in two shifts to two different groups of children can juice be served at both meals?

Yes. Juice must only be used to meet the vegetable component or fruit component at one meal or snack per day. In this situation, the center is using juice to meet the vegetable component or fruit component at one meal. However, in the question above, the center used juice to meet the vegetable component or fruit component at two distinct snacks and that is not allowed under the updated meal patterns.

