



NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

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June 17, 2019

Memorandum

**NC CACFP 19-12
CACFP 13-2019**

To: Institutions Participating in the Child and Adult Care Food Program

From: Courtney Jones, Special Nutrition Programs Manager 

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

This memorandum expands flexibility for crediting vegetables in the Child Nutrition Programs (CNPs), 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.

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AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

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) 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, beans and peas (legumes) may be counted as either a meat alternate or as a vegetable, but not as both in the same meal. [7 CFR 226.20(a)(5)(v)].

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.

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

Program operators should direct any questions concerning this guidance to their Regional Consultant or the NC CACFP Nutrition, Training, and Policy Team at CACFPtraining@dhhs.nc.gov

Please note:

A recorded webinar on this policy memo will be available from USDA's Team Nutrition. Go to: <https://www.fns.usda.gov/tn/crediting-updates-child-nutrition-programs-be-know-webinar-series>