



Georgia Department of Early Care and Learning

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MEMORANDUM

To: Institutions and Sponsors Participating in the Child and Adult Care Food Program (CACFP) and the Summer Food Service Program (SFSP)

From: Sonja R. Adams, Director of Provider Services – Nutrition (*Original Signed*)

Date: May 17, 2019

Subject: Crediting Pasta Products Made of Vegetable Flour in the CNPs

Legal Authority: USDA Policy Memorandum SP 26-2019, CACFP 13-2019, SFSP 12-2019, April 17, 2019; and SP 08-2019, CACFP02-2019, SFSP 02-2019, December 4, 2018.

***Cross Reference/
See also:***

DECAL Policy Memorandum, *Update of Food Crediting System to Include Various Food Items Which Were Previously Uncreditable*, December 28, 2018.

This memorandum expands on the Food and Nutrition Service (FNS) policy guidance originally released on December 4, 2018, whereby such guidance sought to inform participating institutions and sponsors of the credibility of various food items which were previously uncreditable.¹ Specifically, this memorandum seeks to clarify *how* pasta products made with vegetable flour will credit towards a reimbursable meal or snack. Previously, institutions and sponsors could credit pasta made with vegetable flour *only if* it was served along with a recognizable vegetable.

Crediting Guidance

Expanding on previously afforded flexibilities, institutions and sponsors may now credit pasta made with vegetable flour(s) 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.

I. Creditability of Pasta Products Based on the Amount of Vegetable Flour(s)

A. Pasta Products made with 100% Vegetable Flour(s)

¹ USDA Policy Memorandum, SP 08-2019, CACFP 02-2019, SFSP 02-2019, December 4, 2018.

Pasta products made of one or more vegetable flour(s) may credit towards the **vegetable** requirements. Therefore, consistent with vegetable crediting guidelines:

- $\frac{1}{2}$ **cup** of pasta made of 100% vegetable flour(s) credits as $\frac{1}{2}$ **cup** of vegetables.

Additionally, pasta products made of flour(s) from **one vegetable subgroup**, may credit towards the appropriate vegetable subgroup. For example, pasta made of 100% red lentil flour would credit toward the weekly $\frac{1}{2}$ cup legumes requirement.

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

- With a Product Formulation Statement (PFS) from the food manufacturer detailing the actual volume of each vegetable per serving; or
- The product can credit towards the additional vegetables needed from any vegetable subgroup to meet the overall weekly vegetable requirements *if the actual volume of each vegetable flour is unknown*.

If utilizing the PFS to credit, the pasta product may credit toward specific vegetable subgroups.

B. Pasta Products with Both Vegetable Flour(s) and Other Non-Vegetable Ingredients

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 the PFS detailing the actual volume of vegetable flour per serving.

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

II. Creditability of Pasta Products Based on the Amount of Legume Flour(s)

A. Pasta Products made with 100% Legume Flour(s)

Institutions and sponsors may credit $\frac{1}{2}$ **cup** of cooked pasta made of 100% legume flour(s) 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. However, at menu planner's discretion, legumes may credit as a **vegetable or a meat alternate**, but not as both in the same meal. Further, institutions and sponsors 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.²

Note: This crediting change does not remove the visual recognition requirement for legume pasta crediting towards the meat/meat alternate component of a reimbursement meal.

Additional Requirements – Signs and Training

In order to help children understand what kinds of foods are in their meals and snacks, institutions and sponsors must indicate (by using signs or other nutrition education), that pasta made of **vegetable flour** is a “vegetable” and not a grain component of their 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.

² See also the *Manufacturer's Product Formulation Statement (PFS)* section of the CN Labeling Program website located at, <https://www.fns.usda.gov/cnlabeling/food-manufacturersindustry>

Moreover, it is imperative that institutions and sponsors are trained to recognize a reimbursable meal. Serving line staff should be informed when pasta made with vegetable flour is offered and should be knowledgeable on how the pasta contributes to a reimbursable meal. DECAL strongly encourages Program participants to frequently refer to the Training Section within GA ATLAS in order to register and complete trainings on meal pattern requirements.

For questions concerning this memorandum, please contact the Policy Administrator at (404) 651-8193.