



Georgia Department of Early Care and Learning

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**Nathan Deal**  
*Governor*

**Amy M. Jacobs**  
*Commissioner*

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## MEMORANDUM

To: All 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: December 28, 2018

Subject: Update of Food Crediting System to Include Various Food Items Which Were Previously Uncreditable

Legal Authority: USDA Policy Memorandum SP 08-2019, CACFP 02-2019, SFSP 02-2019  
*(rescinding USDA Policy Memorandum TA-05-2011)*

This memorandum seeks to inform those institutions and sponsors participating in the Child and Adult Care Food Program (CACFP) and/or the Summer Food Service Program (SFSP) of the various creditable food items which were previously disallowed and uncreditable with respect to Child Nutrition Program meal pattern requirements.

### Background

Pursuant to the Richard B. Russell National School Lunch Act, the nutritional requirements for Child Nutrition Programs (CNPs) must be consistent with the goals of the Dietary Guidelines for Americans and be mindful of the nutritional needs of food insecure children.<sup>1</sup> Consequently, the USDA Food and Nutrition Service (FNS) developed meal patterns predicated on these requirements. Additionally, FNS established crediting guidelines which detail how particular food items contribute to the meal pattern requirements for

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<sup>1</sup> "Dietary Guidelines for Americans" refers to the joint publication by the U.S. Department of Health and Human Services (HHS) and the U.S. Department of Agriculture (USDA) occurring every five years. The most recent edition of the Dietary Guidelines reflects the current body of nutrition science.

purposes of Program reimbursement. Meals meeting the minimum meal pattern requirements of the respective Program are considered creditable and thus reimbursable.

Because nutritional science is constantly evolving and in often times, the interest of public policy, food items which were once deemed creditable by USDA's FNS may not always be. Therefore, DECAL strongly encourages participating institutions and sponsors to frequently reference USDA's *Food Buying Guide for Child Nutrition Programs* coupled with DECAL policy guidance, prior to claiming meals for reimbursement.<sup>2</sup>

### **Crediting Guidance on Shelf-Stable, Dried and Semi-Dried Meat, Poultry, and Seafood Snacks**

Previously, shelf-stable, dried and semi-dried meat, poultry, and seafood snacks (*e.g.* beef jerky and summer sausage) were not considered creditable and could not be incorporated into a reimbursable meal or snack. This is no longer the case as a result of a public comment process. Effective immediately, shelf-stable, dried and semi-dried meat, poultry, and seafood snacks may be utilized at the Program operator's discretion and may be credited towards the meat component in a reimbursable meal or snack. Additionally, Program operators may serve these food items on or off-site.<sup>3</sup> Program operators choosing to credit these items must 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>.

### **Crediting Guidance on Additional Food Items**

Additionally, the following food items although previously unallowable, are now considered creditable:

- Coconut;
- Hominy;
- Popcorn,<sup>4</sup>
- Surimi seafood; and
- Tempeh.

This change is effective immediately. Policy guidance is forthcoming with respect to *how* these five food items listed above will credit towards specific food components to meet Program meal pattern requirements.

FNS will also publish new guidance to allow crediting vegetables disguised as other food components or not provided in traditional forms (*e.g.* noodles or pasta made from vegetables, including legumes).

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

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<sup>2</sup> Food Buying Guide for Child Nutrition Programs, available at <https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>

<sup>3</sup> Examples of meal service occurring off-site might include, but is not limited to, service 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 are already serving dried meat as an extra in the Summer Food Service Program or in sack lunches during the school year.

<sup>4</sup> Pursuant to state licensing requirements, licensed child care learning centers are prohibited from serving popcorn to children less than three (3) years of age. Children older than three years of age, may be served popcorn provided that such food is cut in such a way as to minimize choking. See Ga. Comp. R. & R. 591-1-1-.15(7). Additionally, DECAL encourages institutions and sponsors to take similar health and safety precautions when serving popcorn to elderly or otherwise compromised adult participants.

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.

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