

**Child and Adult Care Food Program (CACFP) Meal Pattern Requirements and the NSLP, SBP, and SMP  
Preschool Meal Patterns: Questions and Answers (Q&A) – March 15, 2018**

This question and answer is for National School Lunch Program (NSLP), School Breakfast Program (SBP), and Special Milk Program (SMP) claiming meals and/or milk for preschoolers. Sponsors claiming preschool students must follow the Child and Adult Care Food Program (CACFP) meal pattern.

**General Requirements**

**1. Are sponsors who claim meals and snacks for preschoolers under the School Nutrition Programs (SNP), purple puzzle piece, required to follow the CACFP Meal Pattern?**

All sponsors that claim meals and snacks for preschoolers under the School Nutrition Programs (SNP) should follow the CACFP Meal Pattern rules and regulations. See question 4 below for some flexibilities when K-5 are co-mingled with preschool students. Schools that claim meals and snacks under the CACFP, orange puzzle piece, should contact the State Agency's CACFP staff – Heather Stinson at [hstinson@doe.in.gov](mailto:hstinson@doe.in.gov).

**2. Are SNP sponsors required to meet the new meal pattern requirements by July 1, 2017 or October 1, 2017?**

Indiana has requested an early implementation of the new meal pattern so that schools can implement before the beginning of the school and will not have to develop and implement a new meal pattern during the school year. All SNP sponsors are required to meet the new meal pattern requirements by July 1, 2017.

**3. Is offer versus serve allowed at breakfast, lunch, or after school snack for preschool students following the CACFP meal pattern?**

No, offer versus serve is not allowed for preschool students following the CACFP meal pattern. Since schools cannot implement offer versus serve for preschool, students must take five components at lunch, four food items from three food components at breakfast, and two of the five meal components for after school snack to be considered a reimbursable meal.

**4. Are there any flexibilities for sponsors that serve preschoolers breakfast and lunch in the same cafeteria with other grade groups (K-12) at the same time?**

Yes, sponsors can use a single menu flexibility when preschoolers and K-5 students are in the same service area at the same time. Sponsors that serve meals to preschoolers and K-5 students in the same service area at the same time may choose to follow the grade-appropriate meal patterns for each grade group, or serve the K-5 meal pattern to both grade groups. When preschoolers are served meals in a different area or at a different time than K-5 students, sponsors must follow the preschool meal pattern as outlined in parts 7 CFR 210.10(o)(3), 210.10(p), and 220.8(o). The option to serve the K-5 meal pattern to preschoolers is only allowed when preschoolers are co-mingled with K-5 students during meal service. [SP 37-2017](#)

**5. What makes up a reimbursable meal and how should sponsors menu plan for preschool students following the CACFP meal pattern?**

Each day for breakfast, sponsors need to plan and serve a milk, vegetable/fruit/both, and grain. For breakfast, a maximum of three times per week, sponsors could, not required, plan and serve

a meal that does not contain any real grains, but the meat/meat alternate replaces the grain. For example a menu for breakfast could be an omelet with cheese, fruit and milk, this would be a reimbursable meal. For lunch each day, sponsors need to plan and serve a milk, meat/meat alternate, fruit, vegetable, and grain. For lunch, sponsors could, not required, plan and serve the students two different vegetable choices versus serving a fruit. For snack, sponsors will need to plan and serve two components from the five components – fruit, vegetable, milk, grain, and meat/meat alternative. [Meal Pattern Chart](#)

**6. Are there weekly requirements for the CACFP meal pattern?**

For the CACFP meal pattern, there are only daily requirements. There are no weekly requirements. [Meal Pattern Chart](#)

**7. If a student is five years old but in Kindergarten, do they need to follow the CACFP meal pattern or the SNP meal pattern?**

Kindergarteners that are five years old can follow the SNP, K-5 meal pattern.

**8. Are food production records required when implementing the CACFP meal pattern for preschoolers?**

Yes, sponsors must complete daily food production records for meals served to preschool students either through the CACFP meal pattern or SNP, K-5 meal pattern. See question 4 below for some flexibilities when K-5 are co-mingled with preschool students.

**9. State licensing does not allow licensed head start grantees to serve fat-free milk. What should we serve to our preschool students?**

The Indiana Department of Education understands that sponsors who are licensed head start grantees cannot serve fat-free milk to their preschool students. These licensed head start grantees can serve 1% milk to meet the state licensing requirements and will not be penalized during an Indiana Department of Education Administrative Review.

**10. What standards must be followed for a la carte/extras such as an extra milk or an entree with preschool students following the CACFP meal pattern?**

Sponsors must follow Smart Snack standards under the School Nutrition Programs. [Smart Snacks](#)

**11. Does the whole grain-rich exemption under the School Nutrition Programs apply to the meals served to preschool students in the CACFP meal pattern?**

No, the SNP whole grain-rich exemption does not apply to the meals served to preschool students in the CACFP meal pattern.

**Meat/Meat Alternate**

**12. Is yogurt creditable?**

Yes, all yogurts served to preschool students must contain no more than 23 grams of sugar per 6 ounces. Yogurt is a good source of protein. Check out the [USDA Yogurt Worksheet](#) when determining sugar limits.

**13. How many times per week can a meat/meat alternate be used to meet the entire grains component at breakfast?**

A meat/meat alternate may be used to meet the entire grains component at breakfast no more than three times per week.

**14. Is tofu and soy yogurt creditable?**

Yes, tofu and soy yogurt can be served to preschool students. [CACFP 21-2016](#)

**15. Does the yogurt sugar limit (no more than 23 grams of sugar per 6 ounces) apply to soy yogurt?**

Yes, soy yogurt may have up to 23 grams of sugar per 6 ounces. [CACFP 08-2017](#)

**16. Does yogurt have to be low-fat or fat-free to credit in the CACFP?**

There is no fat restrictions for yogurt. Sponsors may choose to serve whole-fat, reduced-fat, low-fat, or fat-free yogurt. However, as a best practice, sponsors are encouraged to serve low-fat or fat-free. This is consistent with the Dietary Guidelines for Americans which recommends consuming low-fat or fat-free dairy products (such as milk, yogurt, and cheese) as part of a healthy eating pattern for children 2 years old and older. [CACFP 08-2017](#)

**17. How much meat/meat alternate must be served to meet the grain component at breakfast meals?**

When serving a meat/meat alternate in place of the grains component at breakfast, one ounce of meat/meat alternate is equal to one serving of grains or one ounce equivalent of grains. As a reminder a meat/meat alternate may be served in place of the entire grains component at breakfast a maximum of three times per week. Some examples include 2 ounces of yogurt is ½ ounce equivalent of meat alternate, 2 tablespoons of peanut butter is 1 ounce equivalent of meat alternate, 1 large egg is 2 ounce equivalents of meat alternate, and 1 ounce of cheddar cheese is 1 ounce equivalent of meat alternate. [CACFP 08-2017](#)

**18. Can a sponsor use a meat/meat alternate to meet a portion of the grain component at breakfast, such as half the grains component?**

A meat/meat alternate may only be used to meet the entire grains requirement at breakfast a maximum of three times per week. Serving a meat/meat alternate to meet only a portion of the grains component would increase complexity and monitoring challenges. Specifically, it would be impractical to serve very small quantities of meat/meat alternate to children 1 through 5 years old because those age groups' grain component serving size is already very small. [CACFP 08-2017](#)

**19. If a sponsor is open less than 5 days per week, can they still serve a meat/meat alternate in place of the grains component three times per week?**

Yes, all sponsors have the option to serve meat/meat alternates in place of grain component at breakfast three times per week, no matter how many days per week they are open. This includes sponsors that are open more than 5 days per week. [CACFP 08-2017](#)

**Grains**

**20. The final rule requires that grains be credited using ounce equivalents instead of “servings,” as credited under the current meal pattern requirements. In recognizing that this requires a significant operational change for CACFP centers and day care homes, FNS is delaying the implementation of ounce equivalents until October 1, 2019. FNS will issue additional guidance on ounce equivalents in the future. Can SNP sponsors use ounce equivalents now?**

Yes, sponsors can start to use ounce equivalents now because an ounce equivalent is slightly heavier (16 grams of grains) than a serving size for CACFP (14.75 grams of grains). Therefore, the

ounce equivalent meets the minimum quantity for the CACFP grain component. Please refer to the CN Labeling Program website for more information about qualifying products: [www.fns.usda.gov/cnd/cnlabeling/](http://www.fns.usda.gov/cnd/cnlabeling/). [CACFP 02-2017](#)

- 21. Starting July 1, 2017, at least one serving of grains per day must be whole grain-rich (7 CFR 226.20(a)(4)(i)(A)). Whole grain-rich foods are foods that contain 100 percent whole grains, or that contain at least 50 percent whole grains and the remaining grains in the food are enriched. This whole grain-rich requirement only applies to meals served to children and adults; it does not apply to infant meals. Seems to be the same requirement as NSLP. Can we say that they can use this resource, <https://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf>, to identify a whole grain-rich item?**

Yes, sponsors certainly can use the resource to generally understand and identify whole grain-rich foods. Keep in mind cereals must meet the sugar limit, which this resource does not address. Check out the [USDA Cereal Worksheet](#) when determining sugar limits for cereals and the [Grain Basics Document](#) for more information on whole grain-rich items, grain-based desserts, and breakfast cereals. [CACFP 02-2017](#)

- 22. Are sweet grains/desserts considered a grain in the CACFP meal pattern?**

To better align the CACFP meal patterns with the Dietary Guidelines, grain-based desserts cannot count towards the grain requirement at any meal or snack under the updated CACFP meal patterns (7 CFR 226.20(a)(4)(iii)). Sponsors must comply with this new requirement no later than July 1, 2017. Grain-based desserts are those items that are denoted with a superscript 3 or 4 in [Exhibit A: Grain Requirement for Child Nutrition Programs: Grain Chart](#). The following foods are considered grain-based desserts: cookies, pie crusts (dessert pies, cobbler, and fruit turnovers), doughnuts, cereal bars, breakfast bars, granola bars, sweet rolls, toaster pastries (frosted or unfrosted), cake, coffee cake, and brownies.

Food and Nutrition Services (FNS) recognizes that sponsors may want to occasionally serve grain-based desserts, such as for celebrations or other special occasions. As a reminder, sponsors continue to have the flexibility to serve grain-based desserts as an additional food item that is not reimbursable or part of the reimbursable meal. [CACFP 02-2017](#) and [CACFP 16-2017](#)

- 23. May non-profit food service account funds be used to purchase grain-based desserts?**

Sponsors may not use Program funds to purchase non-creditable foods. Starting July 1, 2017, grain-based desserts are not creditable in CACFP. The one exception to this policy is condiments, herbs and spices. While condiments, herbs and spices cannot credit towards the meal pattern requirements, condiments served with creditable foods and herbs and spices used to prepare and enhance the flavor of meals may be purchased with non-for-profit food service account funds. [CACFP 08-2017](#) and [CACFP 16-2017](#)

- 24. Are scones and puddings considered grain-based desserts?**

Sweet scones, sweet bread puddings, and rice puddings are considered grain-based desserts and cannot count towards the grain component. Similar to crackers, scones can be considered savory or sweet. Savory scones, such as one made with cheese and herbs, credit like a biscuit and are not considered grain-based desserts. However, sweet scones, such as those made with fruit and icing, credit like a cookie and are considered grain-based desserts.

Bread puddings can also be savory or sweet. Sweet bread puddings, such as one made with chocolate chips, is considered a grain-based dessert. However, savory bread puddings, such as one made with spinach and mushrooms, are not considered grain-based desserts.

Menu planners should consider the common perception of the food item and whether it is thought of as a dessert when a food item may not be labeled as a dessert. If a menu planner is unsure of whether or not a food item is considered a grain-based dessert, he or she should work with his or her State agency, as appropriate, to make the decision. Along with the guidance provided here, FNS is developing additional guidance for sponsors to help them understand what is considered a grain-based dessert. [CACFP 08-2017](#) and [CACFP 16-2017](#)

**25. Are homemade granola bars or other homemade grain-based desserts allowed?**

No, homemade and commercially prepared grain-based desserts cannot count towards the grain component in CACFP starting July 1, 2017. There are no exceptions to allow a grain-based dessert to count towards the grain component, including the place of preparation or the preparation method. [CACFP 02-2017](#) and [CACFP 16-2017](#)

**26. Are quick breads, such as banana breads and zucchini bread, still allowed?**

Yes, quick breads are credited in the same group as muffins under Group D in [Exhibit A: Grain Requirement for Child Nutrition Programs: Grain Chart](#) and both may continue to contribute towards the grain component. [CACFP 02-2017](#) and [CACFP 16-2017](#)

**27. Do sponsors have the discretion to choose which meals will include a whole grain-rich grain?**

Yes, sponsors may choose to serve a whole grain-rich item at any meal or snack as long as one grain per day over the course of all the meals and snacks served that day is whole grain-rich. For example, a sponsor may serve a whole grain-rich cereal at breakfast one day and a whole grain-rich pasta at lunch the next day. This will help expose participants to a variety of whole grains and the wide range of vitamins and minerals whole grains provide. [CACFP 02-2017](#)

**28. Are crusts on savory pies, such as chicken pot pie, allowed?**

Yes, crusts on meat/meat alternate (savory) pies, such as chicken pot pie, may credit towards the grains component if it contains at least ¼ serving grain per portion. For more information on how crusts on savory pies can credit, please see the Food Buying Guide for Child Nutrition Programs available at <https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>. [CACFP 08-2017](#) and [CACFP 16-2017](#)

**29. If a sponsor chooses to serve a grain-based dessert with fruit, can the fruit count towards the fruit requirement?**

Yes, the fruit in the grain-based dessert can credit towards the fruit component. The grains portion of a grain-based dessert with fruit, such as pies, cobblers, or crisps, cannot count towards the grain component. Sponsors should serve sweetened fruit in moderation to help reduce children and adults' consumption of added sugars and help children develop a taste preference for unsweetened fruit. [CACFP 02-2017](#) and [CACFP 16-2017](#)

**30. Are black bean brownies allowed at snack?**

Brownies are considered grain-based desserts and cannot credit towards the grains component in any meal. In addition, the black beans in a brownie cannot count towards the meat/meat alternate component. This is because they are not easily recognizable as a meat/meat alternate

and each portion is not likely to have a sufficient amount of meat/meat alternate (1/4 ounce) to contribute to the meat/meat alternate component. [CACFP 08-2017](#) and [CACFP 16-2017](#)

**31. Pancakes and waffles are not grain-based desserts according to Exhibit A. If syrup, honey, jam or another sweet topping is served with the pancakes or waffles, are they then considered grain-based desserts?**

No, adding a sweet topping, such as syrup, to pancakes or waffles does not make them grain-based desserts, and they can continue to be counted towards the grain component. However, FNS strongly encourages sponsors to explore healthier alternatives for toppings, such as fruit or yogurt. Minimizing sweet toppings will help reduce children's and adults' consumption of added sugars. When sugars are added to foods and beverages to sweeten them, they add calories without contributing essential nutrients. [CACFP 02-2017](#) and [CACFP 16-2017](#)

**32. Starting July 1, 2017, breakfast cereals served to preschool students must contain no more than 6 grams of sugar per dry ounce (21.2 grams of sugar per 100 grams of dry cereal) (7 CFR 226.20(a)(4)(ii)). Breakfast cereals include ready-to-eat cereals and instant and hot cereals. This new requirement will help further reduce children and adult participants' intake of added sugars, as recommended by the Dietary Guidelines. How does a sponsor determine if a breakfast cereal has no more than 6 grams of sugar per dry ounce (21.2 grams of sugar per 100 grams)?**

1. There are several ways a sponsor can determine if a breakfast cereal is within the sugar limit. First, sponsors can use any State agency's Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) approved breakfast cereal list. Some stores also have labels on the shelves indicating which breakfast cereals are WIC-approved. All WIC-approved breakfast cereals contain no more than 6 grams of sugar per dry ounce (21.2 grams of sugar per 100 grams), <http://bit.ly/2kYvvy8>.
2. Alternatively, sponsors may use the Nutrition Facts Label on the cereal packaging to calculate the sugar content per dry ounce.
  - First, find the serving size in grams at the top of the Label and the sugars listed towards the middle.
  - Next, divide the total sugars by the serving size in grams.
  - If the answer is equal to or less than 0.212, then the cereal is within the required sugar limit and may be creditable in CACFP.

For example, Cereal A's Nutrition Facts Labels shows that the serving size is 55 grams and the amount of sugar per serving is 13 grams. Therefore, 13 grams (serving size) divided by 55 grams of sugar equals 0.236. Cereal A exceeds the sugar limit because 0.236 is greater than 0.212. [CACFP 02-2017](#)

3. Check out USDA's Cereal Sugar Worksheet, <https://www.fns.usda.gov/sites/default/files/tn/FNSCACFPCereal12.pdf>

**33. If a sponsor makes homemade granola, how can they determine if it meets the sugar limit for breakfast cereals?**

When making homemade granola, a sponsor must calculate the sugar content of the granola based on the recipe they use. The provider should keep the recipe on file to demonstrate the granola meets the breakfast cereal sugar limit if asked during a review. [CACFP 08-2017](#) and [CACFP 16-2017](#)

**34. What is the difference between breakfast cereal and ready-to-eat cereal?**

Breakfast cereal is a broad term defined by the Food and Drug Administration as including ready-to-eat and instant and regular hot cereals, such as oatmeal (21 CFR 170.3(n)(4)). Some examples of ready-to-eat cereals are puffed rice cereals, whole grain o's, and granola. While a ready-to-eat cereal is always a breakfast cereal, a breakfast cereal is not always a ready-to-eat cereal.

FNS uses the terms "breakfast cereals" and "ready-to-eat cereals" in guidance because of this distinction. For example, only ready-to-eat cereals are allowed at snack under the infant meal pattern, but all breakfast cereals served in the CACFP must contain no more than 6 grams of sugar per dry ounce. [CACFP 08-2017](#)

**35. If a sponsor serves breakfast and lunch and the whole grain-rich grain is planned for lunch, but the sponsor is forced to close before serving lunch due to severe weather, will meals be disallowed?**

No, if a sponsor is unable to serve the meal with a whole grain-rich grain due to extenuating circumstances and the menu demonstrates that a whole grain-rich grain was planned for the missed meal(s), no meals will be disallowed on the basis that the whole grain-rich requirement was not met. Menus must show that at least one whole grain-rich grain is offered each day the sponsor is operating. [CACFP 02-2017](#)

**36. If a school offers half-day preschool, can juice be served at morning and afternoon meals?**

Schools that offer half-day preschool where distinct and entirely different groups of children are enrolled for either a morning or afternoon session have a choice. Schools with half-day preschool may choose to handle the half-day sessions as two completely separate programs that are each subject to the all-day preschool meal patterns (e.g., juice is served once per day, at least one grain is whole grain-rich). In this scenario, juice may be served at a morning session meal and an afternoon session meal. Additionally, at least one of the grains must be whole grain-rich in the meals served during the morning session and the afternoon sessions.

Schools with half-day preschool may also choose to apply the all-day preschool meal pattern requirements across both half-day sessions. In this scenario, juice may only be served at a meal during the morning session or the afternoon session, and only one grain across all the meals served in the morning and afternoon sessions, collectively, must be whole grain-rich. [SP 01-2018](#)

**37. If a program only serves snacks, would all the grains served at snack have to be whole grain-rich?**

Yes, if the snack includes a grain, such as crackers with apples, the grain must be whole grain-rich starting October 1, 2017. When a meat/meat alternate is served in place of the grains component at breakfast (allowed a maximum of three times per week), and the sponsor only serves that one meal per day, a whole grain-rich items does not need to be served.

However, programs that only serve snack, such as an at-risk afterschool program, are not required to serve a grain at snack because it is not a required component at snack. A program may offer a reimbursable snack with a fruit and vegetable, milk and fruit, a meat alternate and vegetable, and so forth. But, if a grain is served at snack and it is the only meal served over the

course of the day, the grain must be whole grain-rich. Conversely, if a center or day care home only serves one meal (breakfast, lunch or supper) per day then the grain served at that meal must be whole grain-rich. [CACFP 02-2017](#)

**38. If a sponsor only serves one meal per day, does the grain have to be whole grain-rich every day?**

Yes, if a sponsor only serves one meal per day (breakfast, lunch or supper), then the grain served at the meal must be whole grain-rich to meet with the whole grain-rich requirement. When a meat/meat alternate is served in place of the grains component at breakfast (allowed a maximum of three times per week), and the sponsor only serves that one meal per day, a whole grain-rich item does not need to be served.

Sponsors that only serve a snack, such as an at-risk afterschool program, are not required to serve a grain at snack because it is not a required component at snack. But, if a grain is served at snack (e.g., crackers and apple slices) and it is the only meal served over the course of the day, the grain must be whole grain-rich. [CACFP 08-2017](#)

**39. How should sponsors credit whole corn treated with lime as a whole grain?**

CACFP will remain consistent with NSLP and SBP on methods for crediting whole corn treated with lime as a whole grain, per the [policy memo on corn masa treated with lime](#).

For such an item to be creditable as a whole grain in CACFP, an FDA whole grain claim must be present; FNS will not allow crediting on the ingredient panel, alone. However, FNS recognizes that the FDA claim is often not included on packaging; thus, we will also accept a product statement from the manufacturer, certifying that the product meets the minimum whole grain requirements. If documentation is not available, these products may be served as grains (assuming they are enriched) but will not count as the one whole grain that is required daily.

**40. Are the following items considered a grain based dessert in the CACP meal pattern?**

- Apple or Cherry Frudel – Dessert for breakfast, lunch, and snack
- Pillsbury Maple Burst Pancakes – Not a dessert at breakfast, lunch and snack
- Pillsbury Blueberry Bash Waffles - Not a dessert at breakfast, lunch and snack
- Pillsbury Mini Berry French Toast Sticks – Not a dessert at breakfast, lunch and snack
- Kellogg’s Bug Bite Graham Crackers – Not a dessert for breakfast, lunch, and snack
- Otis Spunkmeyer Muffins (chocolate chip, blueberry, and apple cinnamon) – Not a dessert for breakfast, lunch, or snack
- General Mills Whole Grain Cereal Bars (variety of flavors—cocoa puffs, golden grahams, cinnamon toast crunch, etc.) – Dessert for breakfast, lunch, and snack
- Cinnamon Bun Crunchmania – Not a dessert for breakfast, lunch and snack

A cookie may be called a “breakfast round.” The menu planner should use common perceptions of the product as a way to determine if the product is a grain-based dessert. Menu planners should also be aware that even if a product is not labeled as a traditional dessert item, it may contain higher levels of sugar, fat, and sodium. Menu planners should use their discretion when serving these foods. [CACFP 02-2017](#) and [CACFP 16-2017](#)



**41. The sugar in lucky charms is 10 grams per 28 grams or 1 ounce of cereal. This equates to about 1 cup of cereal. If I give the little ones ½ of that amount then the cereal would work and would not be over the maximum threshold. Correct?**

No, 5 grams of sugar/14 grams serving size = .357 and 10.6 grams of sugar/50 grams per serving = .212. .212 is the Maximum Threshold of sugar for cereal. The lucky charms would not work even if you just gave the students half the amount.

**42. Are sweet crackers (graham crackers – all shapes, animal crackers) considered a grain-based dessert?**

No, sweet crackers (graham crackers – all shapes, animal crackers) are not considered a grain based dessert and can be served at breakfast, lunch, or snack. [CACFP 16-2017](#)

**43. Are there minimum vegetable subgroups that must be met over the course of the week?**

There are no minimum vegetable subgroups that must be met over the course of the week through the CACFP meal pattern. There are still vegetable subgroups for the SNP K-5 meal pattern.

### Juice

**44. Can fruit juice or vegetables juice be served at more than one meal or snack per day?**

Under the updated CACFP 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. [CACFP 25-2016](#)

**45. What meal would be disallowed if a sponsor provides juice at lunch and snack?**

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. [CACFP 25-2016](#)

**46. 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 vegetables 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. [CACFP 25-2016](#)

**47. Can juice be served more than once per day outside 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 sponsors 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 from whole fruits. FNS further encourages sponsors 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 meals. [CACFP 09-2017](#)

**48. When a sponsor serves a smoothie containing fruit and 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. [CACFP 09-2017](#)

**49. If a sponsor 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 sponsor is using juice to meet the vegetable component or fruit component at one meal. [CACFP 09-2017](#)

**50. If a school offers half-day preschool, can juice be served at morning and afternoon meals?**

Schools that offer half-day preschool where distinct and entirely different groups of children are enrolled for either a morning or afternoon session have a choice. Schools with half-day preschool may choose to handle the half-day sessions as two completely separate programs that are each subject to the all-day preschool meal patterns (e.g., juice is served once per day, at least one grain is whole grain-rich). In this scenario, juice may be served at a morning session meal and an afternoon session meal. Additionally, at least one of the grains must be whole grain-rich in the meals served during the morning session and the afternoon sessions.

Schools with half-day preschool may also choose to apply the all-day preschool meal pattern requirements across both half-day sessions. In this scenario, juice may only be served at a meal during the morning session or the afternoon session, and only one grain across all the meals served in the morning and afternoon sessions, collectively, must be whole grain-rich. [SP 01-2018](#)

**Vegetables**

**51. Can two different types of vegetables be served at lunch, rather than a serving of vegetables and a serving of fruit?**

To increase flexibility in menu planning, sponsors may choose to serve two vegetables at lunch, rather than a serving of vegetables and a serving of fruit. This means that the fruit component at lunch 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, they must be two different kinds of vegetables. This does not apply to snack or breakfast. Sponsors cannot serve two fruits at lunch or supper meals under the updated meal patterns. [CACFP 25-2016](#)

**52. 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 child and adult meal patterns. While centers and day care homes may serve two servings of vegetables at lunch, 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 to meals and it increases the amount of vegetables participants are exposed to. [CACFP 09-2017](#)

**53. How do raw leafy greens contribute to the vegetable component? Similarly, how does dried fruit contribute to the fruit component?**

One cup of leafy greens (e.g., lettuce, raw spinach, etc.) counts as ½ cup of vegetables and ¼ cup dried fruit counts as ½ cup of fruit under the updated CACFP meal patterns, which go into effect on July 1, 2017. This is consistent with the National School Lunch and School Breakfast Programs. [CACFP 25-2016](#)

**54. 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 ½ cup of cooked collard greens credit as ½ 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 ½ cup vegetables. [CACFP 09-2017](#)

**55. With separate vegetable and fruit components at lunch 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 ½ cup carrots and 1/8 cup raisins (credits as ¼ 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 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. For example, a center serves 6 year old children ½ cup roasted broccoli and ¼ 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 count 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. [CACFP 09-2017](#)

**56. 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 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 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. [CACFP 09-2017](#)

**57. 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 sponsor may offer two distinct servings of different beans and peas (legumes) in one meal count one towards the vegetable component and one towards the meal/meat alternate component if they are in separate dishes. For example, legumes may be served as part of a salad (vegetable component) 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. [CACFP 09-2017](#)

### Milk

**58. Can sponsors of the Special Milk Program (SMP) begin implementing the updated fluid milk requirements that were established through the CACFP meal pattern final rule prior to July 1, 2017?**

Yes, SMP operators may begin to follow the updated fluid milk requirements as soon as they would like, and no later than July 1, 2017. This is because the updated fluid milk requirements established for the SMP program by the CACFP meal pattern final rule do not contradict the current SMP fluid milk requirements. This final rule revises the SMP milk requirements to align with all of the CACFP's milk requirements, including allowing only low-fat or fat-free milk for children ages 2 years old and older; prohibiting flavored milk for children 2 through 5 years old; and allowing non-dairy milk substitutes that are nutritionally equivalent to milk to be served in place of fluid milk for children with medical or special dietary needs.

**59. Can SNP sponsors serve flavored milk such as chocolate and strawberry to preschool students?**

Sponsors cannot serve flavored milk (chocolate, strawberry, etc.) to preschool students. The CACFP meal pattern allows only white/plain low-fat or fat-free milk for children ages 2 years old and older and prohibiting flavored milk for children 2 through 5 years old (preschool).

**60. Nutrition Requirements for Fluid Milk and Fluid Milk Substitutions in the Child and Adult Care Food Program (CACFP), Q&As and *Nutrition Requirements for Fluid Milk Substitutions*. Do schools follow CACFP requirements or the new requirements for NSLP?**

They must follow CACFP requirements. As mentioned above, we will issue guidance on how to handle comingled preschoolers and K-5. Please stay tuned. [CACFP 17-2016](#)

### Water

**61. Sponsors participating in the NSLP must make potable water available to children at no charge where meals are served during the meal service, and schools participating in the SBP must make potable water available to children at no charge when breakfast is served in the cafeteria. Similarly, child care centers, day care homes, at-risk afterschool programs, and shelters participating in the CACFP (child care facilities) must make potable water available to**

**children, as nutritionally appropriate, throughout the day and at meal times. Do SNP sponsors need to follow CACFP or SNP requirements?**

Both CACFP and SNP requires sponsors to serve at meal times (breakfast and lunch), and it is highly recommended to serve water during snacks and at other points during the school day.

[CACFP 18-2016](#)

### **Frying On-Site**

**62. Can deep fat-fried foods (cooked by submerging in hot oil or other fat) that are prepared onsite be part of a reimbursable meal?**

No, deep fat-fried foods (cooked by submerging in hot oil or other fat) that are prepared onsite cannot be part of a reimbursable meal. Sponsors may purchase and serve foods that are pre-fried, flash-fried, or par-fried by the manufacturer, such as fried fish sticks or potato wedges.

**63. Are vended meals with deep-fried foods allowed?**

While deep-fat frying is not allowed as a way of preparing foods on-site, vended meals are not considered to be prepared on-site. Therefore, a center may claim a vended meals that contains deep-fried foods as long as the deep-fried food was prepared by the vendor off-site.

FNS encourages to work with their vendors to request foods be prepared using healthy cooking techniques, such as baking or steaming. [CACFP 08-2017](#)

**64. Can meals that are prepared in a central, satellite kitchen, contain deep-fried foods?**

Meals served at centers where the meal is prepared at a central, satellite kitchen cannot contain a deep-fried food and be claimed for reimbursement. However, sponsors with meal prepared at a central, satellite kitchens may still purchase and serve foods that are pre-fried, flash-fried, or par-fried by the manufacturer, such as fried fish sticks or potato wedges. But, a central, satellite kitchen must reheat these foods using a method other than deep-fat frying. [CACFP 08-2017](#)

### **Family Style Meal Service**

**65. Can sponsors serve meals family style to their preschool students?**

Serving meals family style is optional and may be used in a preschool setting. If a sponsor chooses to serve meals family style they must comply with the following practices (7 CFR 226.26(n)):

1. A sufficient amount of prepared food must be placed on each table to provide the full required portions of each of the components, as outlined in 7 CFR 226.20(c)(1) and (2), for all children at the table and to accommodate supervising adults if they wish to eat with the children.
2. Children must be allowed to serve the food components themselves, with the exception of fluids (such as milk and juice). During the course of the meal, it is the responsibility of the supervising adults to actively encourage each child to serve themselves the full required portion of each food component of the meal pattern. Supervising adults who choose to serve the fluids (including milk and juice) directly to the children or adults must serve the required minimum quantity to each child or adult. For example, children 3-5 years old must be served 6 fluid ounces of milk at breakfast and lunch.
3. Sponsors that use family style meal service may not claim second meals for reimbursement.

[CACFP 05-2017](#)

**66. Can one or more components be offered family style if a sponsor is not able to offer all components family style?**

Even when a complete family style meal service is not possible or practical, it may be useful to offer one component or multiple components in a family style manner. Supervising adults should provide assistance to children as needed when serving foods from communal platters. This practice can help young children develop motor skills and the dexterity and hand strength needed to serve foods. For tips on how to successfully serve meals family style, refer to the Nutrition and Wellness Tips for Young Children Supplement E: Support for Family Style Meals available at [http://www.fns.usda.gov/sites/default/files/tn/Supplement\\_E.PDF](http://www.fns.usda.gov/sites/default/files/tn/Supplement_E.PDF). [CACFP 05-2017](#)

**67. How much food does a center or day care home need to initially serve on the table when serving meals family style?**

The CACFP regulations require that the full required minimum serving sizes of each required food component of the meal (7 CFR 226.20(c)(1)-(2)) be placed on each table for all the children at the table and to accommodate supervising adults if they wish to eat with the children or adults. For example, if there are 3 children between the ages 3-5 years and 1 supervising adult seated at a table for lunch, then at least  $\frac{1}{4}$  cup of sliced apples must be available for each person. Therefore, a total of 1 cup of apple slices must be served in the communal plate or bowl that is placed on the table. In this example, a total of 1 cup of sliced apples must be placed in the communal bowl or plate to meet the  $\frac{1}{4}$  cup per person requirement for the fruit component (this includes the  $\frac{1}{4}$  cup of fruit for the supervising adult). [CACFP 05-2017](#)

**68. If a child refuses to serve him/herself the full minimum serving size of a required food component, such as vegetables, during a family style meal, can that meal still be claimed for reimbursement?**

Yes, when preparing foods for family style meals, enough food must be provided for each child, as well as any supervising adults who are eating with the children, to be able to take the full minimum serving size. Children should be encouraged to take the full serving size, but they are not required to self-serve or consume the full serving size to claim reimbursement. If a child refuses to take a component, the meal can also still be claimed for reimbursement when serving meals family style. [CACFP 05-2017](#)

**69. During family style meals, can a supervising adult assist a young child that is not able to serve him or herself?**

Yes, children must be allowed to serve themselves in family style meal service. However, supervising adults may assist young children who are unable to serve themselves. In the case of young children, family style meals are an opportunity to help children develop motor skills. A sponsor may choose to have children start by serving themselves one food item while the supervising adult acts as a model and serves the rest of the food items. [CACFP 05-2017](#)

**70. What if a child or adult serves themselves too much or too little food?**

Children can be guided to follow their hunger and fullness cues and be encouraged to eat accordingly. This is one of the benefits of family style meals: it allows children to control how much they want to eat. To help children take the appropriate serving size for their age, sponsors can use serving utensils that provide the amount needed for one serving. For example, if the meal pattern requires  $\frac{1}{2}$  cup of fruit, use a  $\frac{1}{2}$  cup scoop, ladle or spoodle for participants to serve the fruit. If a child does not take the minimum serving size, he or she should be encouraged to take the full serving size. However, the child does not have to self-serve or consume the full serving size in order for the meal to be reimbursable. Conversely, if a child takes more than the serving size for their age group, the meal is still reimbursable because the meal pattern serving

sizes are minimums. If the food in a communal platter is emptied before each participant is served, then the platter must be re-filled so each participant is offered a complete reimbursable meal. And, as a reminder, second meals cannot be claimed for reimbursement when serving meals family style. [CACFP 05-2017](#)

**71. Can leftover food be stored safely and served in another reimbursable meal?**

Sponsors must be aware of and in compliance with all applicable local and State health and food safety codes. Therefore, sponsors should refer to their local and State agencies to determine if leftover foods can be reused. It is important to keep in mind that local and State health and food safety codes may place specific limitations on which food or beverage items may be reused.

[CACFP 05-2017](#)

**Special Dietary Needs**

**72. If a preschool student has special dietary needs, does the sponsor follow CACFP or SNP requirements?**

If sponsors are claiming meals for preschoolers under SNP, they should follow SNP requirements. If sponsors are claiming meals for preschoolers under SNP but are required to follow the CACFP meal pattern for these preschoolers, they should follow SNP requirements. If sponsors are claiming meals under CACFP, they should follow CACFP requirements.