



Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

Date: October 30, 2024

Memo code: SP 03-2025, CACFP 03-2025, SFSP 01-2025

Subject: Substituting Vegetables for Grains in American Samoa, Guam, Hawaii, Puerto Rico, the U.S. Virgin Islands, and Tribal Communities

To: Regional Directors, Child Nutrition Programs, All Regions,
State Directors, Child Nutrition Programs, All States

On April 25, 2024, the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) published the final rule, *Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans* ([89 FR 31962](#)). While most provisions in the 2024 final rule focus on the National School Lunch Program (NSLP) and School Breakfast Program (SBP), this rule also includes limited updates to the Child and Adult Care Food Program (CACFP) and the Summer Food Service Program (SFSP) to better align Child Nutrition Programs (CNP) requirements. These updates represent continued progress toward supporting the nutritional quality of meals offered through the CNPs and meeting cultural food preferences of Program participants.

This memorandum clarifies longstanding Program regulations and provides updated guidance on the use of vegetables as a substitution for grains, including whole grain-rich products, in eligible areas, as described in Program regulations. This guidance also provides updates on the expansion of this flexibility to eligible areas following the 2024 final rule. Lastly, this memorandum informs affected State agencies and Program operators how to credit vegetables toward the grains component for all CNPs, including the NSLP, SBP, SFSP, and CACFP. This memorandum supersedes SP 29-2013, *Crediting Vegetables for Grains in American Samoa, Puerto Rico, and the Virgin Islands*, issued on March 21, 2013.

Longstanding Program Regulations

Longstanding Program regulations at [7 CFR 210.10\(c\)\(3\)](#), [220.8\(c\)\(3\)](#), [225.16\(f\)\(3\)](#), and [226.20\(f\)](#) allowed Program operators in American Samoa, Puerto Rico, and the U.S. Virgin Islands to substitute vegetables to meet the grains or breads component in the NSLP, SBP, SFSP, and CACFP. Additionally, prior regulations allowed this option in Guam for SFSP and CACFP sponsors, institutions, and facilities.

2024 Final Rule Updates

The 2024 final rule amended existing regulations to allow additional Program operators and areas to substitute vegetables to meet the grains or breads component. Expanding this menu planning option responds to extensive partner feedback and is intended to support traditional foodways in CNPs. A full list of eligible areas and entities, including those that were eligible under prior regulations and those that are newly eligible under the 2024 final rule, is below. The 2024 final rule also clarified that any creditable vegetable can be substituted for the grains or bread component with an emphasis on traditional and culturally relevant vegetables.

List of Eligible Entities: Qualifying Criteria

The table below outlines all Programs that are eligible to use this menu planning flexibility and the corresponding regulatory citations. Program operators only need to meet one of the qualifying criteria for the relevant program in order to implement the menu planning flexibility.

Program	Existing Eligible Entities	New Eligible Entities	Regulation
NSLP	Schools in American Samoa, Puerto Rico, and the U.S. Virgin Islands	- Schools in Guam and Hawaii - SFAs and schools that are tribally operated, operated by the Bureau of Indian Education or that serve primarily American Indian or Alaska Native children	7 CFR 210.10(c)(3)
SBP	Schools in American Samoa, Puerto Rico, and the U.S. Virgin Islands	- Schools in Guam and Hawaii - SFAs and schools that are tribally operated, operated by the Bureau of Indian Education or that serve primarily American Indian or Alaska Native children	7 CFR 220.8(c)(3)
SFSP	Programs in American Samoa, Guam, Puerto Rico, and the U.S. Virgin Islands	- Programs in Hawaii - Sponsors and sites in any State that serve primarily American Indian or Alaska Native children	7 CFR 225.16(f)(3)
CACFP	Programs in American Samoa, Guam, Puerto Rico, and the U.S. Virgin Islands	- Programs in Hawaii - Institutions or facilities in any State that serve primarily American Indian or Alaska Native participants	7 CFR 226.20(f)

For the purpose of this menu planning option, “serving primarily American Indian or Alaska Native” applies to Programs where American Indian or Alaska Native participants represent the largest demographic group of enrolled participants.

State agencies are reminded to distribute this information to Program operators immediately. Program operators should direct any questions concerning this guidance to their State agency. State agencies should direct questions to the appropriate FNS regional office.

Original Signed

for

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Questions and Answers

For the purpose of these questions and answers, “applicable Programs” and “applicable Program operators” include the following eligible entities:

- All CNPs in American Samoa, Guam, Hawaii, Puerto Rico, and the U.S. Virgin Islands.
- School food authorities (SFAs) and schools that are tribally operated or operated by the Bureau of Indian Education.
- School food authorities, schools, sponsors, sites, institutions, and facilities that serve primarily American Indian or Alaska Native participants.

Crediting and Menu Planning

1. Which vegetables may applicable Program operators use to substitute for the grains or bread component?

Applicable Program operators may use any creditable vegetable to substitute for the grains or bread component. This menu planning option is intended to accommodate cultural food preferences, product availability, and cost concerns. FNS also recognizes the importance of including traditional Indigenous and cultural vegetables, such as prairie turnips, breadfruit, squash, taro, and others, in meals that are culturally relevant and align with local food preferences.

2. Do vegetables substituted for grains contribute to the vegetable component?

No. Vegetables substituted for grains under this flexibility do not contribute toward the daily or weekly minimum vegetables requirements in the NSLP, SBP, SFSP, or CACFP; nor do they contribute toward the vegetable subgroup requirements in the NSLP. Program operators are required to offer another vegetable, as applicable, to meet the vegetable component requirements and/or vegetable subgroup requirements under the respective Program meal pattern.

3. What amount of vegetables is required to substitute for 1 ounce equivalent (oz eq) of grains for the National School Lunch Program (NSLP), School Breakfast Program (SBP), and the Child and Adult Care Food Program (CACFP) meal patterns?

Applicable Program operators may substitute $\frac{1}{2}$ cup of vegetables for 1 oz eq of grains, except when raw leafy greens are substituted for the grains component. Program operators must serve 1 cup of raw leafy greens for 1 oz eq of grains. When using this menu planning option, vegetables substituting for grains would only count toward the grains component. In other words, Program operators must offer another vegetable toward the vegetable component and may not use the same serving of vegetable to credit for both components.

For example, if a school substitutes $\frac{1}{2}$ cup of vegetables for the grains requirement at lunch, the school must offer another vegetable to meet the minimum daily requirement for the vegetable component. FNS encourages Program operators to offer different vegetables for each component. In this example, a school could offer prairie turnips toward the grains component, and green beans toward the vegetable component.

4. What amount of vegetables is required to substitute for 1 serving of grains/bread for the Summer Food Service Program (SFSP) meal pattern?

Applicable summer sites may substitute $\frac{1}{2}$ cup of a vegetable for 1 serving of grains/bread. When substituting vegetables for the grains/bread requirement, the meal pattern component requirements for offering fruits/vegetables must also be met.

For example, if an applicable summer site substitutes $\frac{1}{2}$ cup vegetables for 1 grains/bread serving at lunch or supper, the summer site must still offer two additional fruits/vegetables, totaling $\frac{3}{4}$ cup, in addition to the vegetables that were substituted for the grains/bread serving. FNS encourages Program operators to offer different vegetables when more than one vegetable is offered at a meal.

5. Can vegetables substituted for grains in applicable SFAs or schools count toward the weekly whole grain-rich requirement in the NSLP and SBP?

Yes, if applicable SFAs and schools choose to offer a combination of vegetables and grains to meet the grains requirement, they have the option to count vegetables substituted for grains toward the whole grain-rich requirement in the NSLP and SBP. However, they are not required to do so, and may instead choose to count only grains offered when calculating the 80% whole grain-rich requirement. Under the second approach, vegetables substituted for grains in the NSLP and SBP would not count as whole grain-rich or enriched grains; they would be excluded from the 80% whole grain-rich calculation altogether. USDA encourages applicable SFAs and schools to choose the option that works best for them.

For example, if a school substitutes ½ cup of sweet potatoes for grains in the NSLP, the school could either:

- Count the ½ cup of sweet potatoes as 1 oz eq of whole grain-rich grains, which could then count toward meeting the 80% whole grain-rich requirement for NSLP.
- Choose not to count the ½ cup of sweet potatoes toward the whole grain-rich requirement and instead calculate the 80% whole grain-rich requirement for NSLP by counting only actual grains offered during the week.

6. Can vegetables that are substituted for grains in applicable Programs be used to meet the daily whole grain-rich requirement in the CACFP?

Yes, vegetables substituted for grains can be used to meet the whole grain-rich requirement in the CACFP if offered in the minimum quantity required, as described in Question 3.

For example, if an applicable CACFP operator substitutes ½ cup of a vegetable to replace 1 oz eq of grains, CACFP operators can choose to use that ½ cup of a vegetable to meet the daily whole grain-rich requirement.

7. For applicable Programs, is there a limit on the number of times that vegetables can be substituted for grains in a week?

No. According to the *Dietary Guidelines for Americans, 2020-2025*, most vegetables and fruits are major contributors of several nutrients that are underconsumed in the United States, including folate; magnesium; potassium; dietary fiber; and vitamins A, C, and K. There is no limit on the number of times per week that vegetables may be substituted for the grains requirement; however, the overall reimbursable meal must meet the weekly calorie ranges for the specific grade group in the NSLP or SBP, as well as the vegetable component and vegetable subgroup requirement as applicable.

8. Does the option to substitute vegetables for grains extend to the infant meal pattern?

Yes. Extending the option to substitute vegetables for grains to the infant meal pattern allows infants to consume foods and develop taste preferences that align with their cultural upbringing.

9. Can applicable Program operators substitute vegetables for the grains or bread component at snack meal service?

Yes. Applicable Program operators may substitute vegetables for the grains or bread component at snack meal service. At least two meal components must be offered. The same serving of vegetables cannot count toward two components. FNS encourages Program operators to offer different vegetables for each component.

For example, an applicable CACFP operator serving at-risk afterschool snacks to children ages 6-18 may substitute ½ cup of vegetables for 1 oz eq of grains to meet the first of any two components required for snack. In this example, the CACFP operator may serve any meal component other than grains as the second component; this may include serving another ¾ cup of vegetables toward the vegetables component.

Eligibility and Documentation

10. Are eligible Program operators required to submit a request for approval to use this menu planning option?

No. Eligible Program operators are not required to submit a request of approval to use this menu planning option.

11. Are eligible Program operators in American Samoa, Guam, Hawaii, Puerto Rico, and the U.S. Virgin Islands required to maintain documentation of their eligibility to use this menu planning option?

No. All schools, sponsors, institutions, and facilities located in American Samoa, Guam, Hawaii, Puerto Rico, and the U.S. Virgin Islands are automatically eligible to use this menu planning option and are not required to maintain documentation to demonstrate that they qualify to use this menu planning option.

12. Which eligible Program operators are required to maintain documentation of their eligibility to use this menu planning option?

The 2024 final rule requires Program operators to maintain documentation, if they qualify and choose to use this menu planning option based on any of the following criteria:

- SFAs or schools that are tribally operated
- SFAs or schools operated by the Bureau of Indian Education
- SFAs or schools that serve primarily American Indian or Alaska Native children
- Sponsors, institutions, or facilities operating the SFSP or CACFP that serve primarily American Indian or Alaska Native participants

For reference, “serving primarily American Indian or Alaska Native” includes Programs where American Indian or Alaska Native participants represent the largest demographic group of enrolled participants.

13. What is acceptable documentation for demonstrating eligibility to use this menu planning option?

The following examples of documentation may be used to demonstrate eligibility to use this menu planning option. This is not an exhaustive list:

- **Certifying statement:** SFAs that are tribally operated or operated by the Bureau of Indian Education could use a certifying statement indicating that the SFA is tribally operated or operated by the Bureau of Indian Education.
- **Aggregate data:** SFAs, sponsors, institutions, or facilities that serve primarily American Indian or Alaska Native children could use aggregate data reporting student demographics, such as participant self-reporting, school data, or census data.
- **Certifying statement:** For enrolled sites, the sponsor, institution, or facility provides a certifying statement indicating that the site primarily serves American Indian or Alaska Native participants.
- **School or census data:** For non-enrolled sites, the sponsor, institution, or facility determines that American Indian or Alaska Native participants represent the largest demographic group of participants served by the site, based on school or census data.

If the documentation above is not available, eligible Program operators should work with their State agency to determine documentation that most accurately represents eligibility to implement this menu planning option.

For the NSLP and SBP, the SFA is responsible for maintaining documentation to demonstrate that the SFA or its schools qualify to use this option. For the SFSP and CACFP, the sponsor, institution, or facility is responsible for maintaining site-level documentation.