



United States  
Department of  
Agriculture

Food and  
Nutrition  
Service

3101 Park  
Center Drive  
Alexandria, VA  
22302-1500

DATE: March 21, 2013

MEMO CODE: SP 29-2013

SUBJECT: Crediting Vegetables for Grains in American Samoa, Puerto Rico, and the Virgin Islands

TO: Regional Directors  
Special Nutrition Programs  
All Regions

State Directors  
Child Nutrition Programs  
All States

This memorandum addresses whether vegetables may be used as a substitution for all grains, including whole grain-rich products in outlying areas (American Samoa, Puerto Rico, and the Virgin Islands). In addition, this memorandum informs affected State agencies how to credit vegetables as a grain component for school meals in these areas.

The *Nutrition Standards in the National School Lunch and School Breakfast Programs* final rule, published on January 26, 2012, continues the meal pattern exception that permits school food authorities (SFAs) in outlying areas to offer a vegetable such as yams, plantains, or sweet potatoes to meet the grains requirements in the National School Lunch Program (NSLP) and School Breakfast Program (SBP). The exception is based on the premise to accommodate cultural food preferences, product availability, and cost concerns in these areas.

Therefore, the guidance below provides clarification to SFAs in outlying areas on substitution of vegetables to meet the grain requirements in NSLP and SBP.

**1. Can vegetables that are currently substituted for grains in outlying areas (schools in American Samoa, Puerto Rico, and the Virgin Islands) be used for the whole grain-rich requirements?**

Yes, when considering vegetables as a grain component for the reimbursable meal, the vegetables served must meet the daily minimum grain quantity required and can be used to meet the whole grain-rich requirement.

**2. Since vegetables can be used in place of the grain requirements in outlying areas, will there be a limit on the number of times that vegetables can be used as grains in a week?**

No. According to the 2010 *Dietary Guidelines for Americans*, most vegetables and fruits are major contributors of a number of nutrients that are under consumed in the United States, including folate, magnesium, potassium, dietary fiber, and vitamins A, C, and K. There is no limit on the amount of times vegetables may be substituted for the grains requirement; however, the overall reimbursable meal must not exceed the calorie range for the specific grade group.

**3. What will happen when we go to whole grain-rich for the full week in SY 2014-2015 in outlying areas where vegetables may be substituted for grains?**

In SY 2012-2013 and SY 2013-2014 for lunch, and in SY 2013-2014 for breakfast half of the grains offered weekly must be whole grain-rich, except for schools in the outlying areas that may substitute vegetables for grains. Schools in outlying areas may continue to offer vegetables as a substitute for grains in SY 2014-2015 when all lunches and breakfasts are transitioned to whole grain-rich products. When grains are offered beginning SY 2014-2015, they must meet the whole grain-rich criteria.

**4. How much vegetable is required to substitute for 1 oz eq grain in outlying areas?**

Schools in outlying areas may substitute ½ cup vegetable for 1 oz eq grain. When substituting vegetables for the grains requirements, the meal pattern quantities for offering vegetables must also be met. In other words, the vegetables substituting for grains may not also credit as the vegetable offering. However, in outlying schools that are using *offer versus serve* (OVS), the ½ cup vegetable substituted for grains may be used to meet the ½ cup OVS vegetable requirement as long as there are at least two other components that make up the reimbursable lunch in their required quantities.

SFAs with questions regarding this guidance may contact their State agency. State agencies may direct any questions concerning this guidance to the appropriate FNS Regional Office.

**Original Signed**

Melissa A. Rothstein  
Acting Director  
Child Nutrition Division