



Food and
Nutrition
Service

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SUBJECT: Crediting Popcorn in the Child Nutrition Programs

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

This memorandum provides guidance on crediting popcorn in the Child Nutrition Programs (CNPs), including the National School Lunch Program (NSLP), School Breakfast Program (SBP), Child and Adult Care Food Program (CACFP), and Summer Food Service Program (SFSP). Previously, popcorn could not contribute to any component in the meal patterns, but could be served as an “extra” food. **Based on stakeholder feedback, the Food and Nutrition Service (FNS) is updating CNP food crediting guidance to allow popcorn to credit as a whole grain.**

In December 2017, FNS solicited comments on the CNP crediting system through a Request for Information (RFI). FNS sought public input about specific foods, including popcorn, due to high interest. FNS asked whether popcorn should credit, and if so, how it should credit. FNS also invited commenters to provide input on any ingredients, processing methods, or nutrient standards that FNS should consider, and to share their ideas for incorporating popcorn into a reimbursable meal or snack. The comments are available for review at: <https://www.regulations.gov/docket?D=FNS-2017-0044>.

Popcorn is a whole grain food and a good source of fiber. The 2015-2020 Dietary Guidelines for Americans identify dietary fiber as an “underconsumed nutrient” and a “nutrient of public health concern,” meaning most children and adults do not consume enough dietary fiber and that low intakes of dietary fiber are associated with health issues. Expanding food crediting in the CNPs to include popcorn, a budget-friendly, whole grain item that is particularly popular with children, could help address these concerns.

NSLP, SBP, and CACFP operators now may credit:

- $\frac{3}{4}$ cup (or 0.25 ounces (7 grams)) popped popcorn as $\frac{1}{4}$ ounce equivalent of whole grains in a reimbursable meal or snack.
- 1 $\frac{1}{2}$ cups (or 0.5 ounces (14 grams)) popped popcorn as $\frac{1}{2}$ ounce equivalent of whole grains in a reimbursable meal or snack.
- 3 cups (or 1.0 ounce (28 grams)) popped popcorn as 1 ounce equivalent of whole grains in a reimbursable meal or snack.

SFSP and NSLP Afterschool Snack operators now may credit:

- $\frac{3}{4}$ cup popped (or 0.25 ounces (7 grams)) popcorn as $\frac{1}{4}$ serving of grains in a reimbursable meal or snack.
- 1 $\frac{1}{2}$ cups (or 0.5 ounces (14 grams)) popped popcorn as $\frac{1}{2}$ serving of grains in a reimbursable meal or snack.
- 3 cups (or 1.0 ounce (28 grams)) popped popcorn as 1 serving of grains in a reimbursable meal or snack.

In response to the RFI, some commenters acknowledged that the high volume of popcorn required for crediting may be too much for some children, especially young children. FNS encourages Program operators to pair popcorn with another creditable grain in these situations, using the crediting guidance for $\frac{1}{2}$ and $\frac{1}{4}$ ounce equivalents and servings outlined above. For example, Program operators could serve popcorn in a trail mix with pretzels and cereal for a snack, or serve popcorn with a whole-grain wrap in the NSLP.

FNS will update the *Food Buying Guide for Child Nutrition Programs* to include yields for popcorn in the grains section. To view the *Food Buying Guide*, please visit: <https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>.

Popcorn also may be used as an ingredient in creditable foods prepared commercially or by Program operators. Popcorn must be present in the minimum creditable quantities to credit in the CNPs (for popcorn that is $\frac{3}{4}$ cup or $\frac{1}{4}$ ounce equivalent). To credit commercially-prepared foods, Program operators must obtain a Product Formulation Statement. For more information, please see The Manufacturer's Product Formulation Statement section of the Child Nutrition Labeling Program website at: <https://www.fns.usda.gov/cnlabeling/food-manufacturersindustry>. Program operators using popcorn as an ingredient in other food prepared in-house will follow the standards already in place for determining meal contributions for in-house recipes, including creating standardized recipes. Additionally, to determine how to credit popcorn that is ground into flour, and made into crackers for example, Program operators will follow Exhibit A, found in the appendix of the *Food Buying Guide*.

Some commenters expressed concern about ingredients and toppings, such as salt, caramel, cheese, and butter, sometimes served with popcorn. NSLP operators must ensure that any oil or fat used to pop the popcorn is included in the nutrient profile. The dietary specifications for calories, saturated fat, and sodium will limit the use of added ingredients in the NSLP.¹

Unlike the school meal programs, CACFP and SFSP do not have specific quantitative requirements for calories, saturated fat, and sodium. Thus, when popcorn is served in

¹ NSLP operators are encouraged to choose varieties of popcorn that meet the Smart Snacks in School requirements when considering serving popcorn as part of a reimbursable meal or snack. Please see *A Guide to Smart Snacks in Schools* for more information about the requirements: <https://www.fns.usda.gov/tn/guide-smart-snacks-schools>.

CACFP and/or SFSP, FNS encourages Program operators to limit the use of toppings such as salt, caramel, cheese, and butter that add sodium, sugar, or saturated fat. Although these toppings are not prohibited, FNS strongly encourages healthier alternatives, including seasoning the popcorn with herb blends or serving fresh, plain popcorn. Program operators are to use their discretion in determining if a certain popcorn product or recipe is perceived to be a grain-based dessert and to follow the guidance in place for grain-based desserts accordingly.

In addition, to prevent the risk of choking, Program operators must consider the developmental readiness of children and the ability of disabled or older adults to swallow safely when deciding whether to offer popcorn. This consideration is especially important for Program operators that serve young children.

FNS remains committed to simplifying menu planning for CNP operators, promoting the efficient use of Program funds, and ensuring Program operators and participants have a wide variety of nutritious and appealing food choices. We recognize that crediting decisions have an impact on schools, child care centers, adult day care centers, day care homes, the food industry, and most importantly, participating children and adults. The agency is committed to staying up-to-date with the evolving food and nutrition environment through continued engagement with a variety of stakeholders. Through these efforts, FNS will work to maximize the availability of wholesome food options while minimizing administrative burden in the CNPs.

State agencies are reminded to distribute this memorandum to Program operators. Program operators should direct any questions concerning this guidance to their State agency. State agencies with questions should contact the appropriate FNS Regional Office.

Original Signed

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The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.