



Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

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Subject: Substitution of Vegetables for Fruit Flexibility in the School
Breakfast Program: Questions and Answers for Program Operators

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](#), April 25, 2024). The rule finalized practical, science-based, long-term school nutrition requirements based on the goals of the *Dietary Guidelines for Americans, 2020-2025* (*Dietary Guidelines*), extensive partner input, and lessons learned from prior rulemakings. These updates represent continued progress toward supporting the nutritional quality of school meals, strengthening the Child Nutrition Programs, and advancing USDA's commitment to nutrition security.

The 2024 final rule included an optional provision that continues to allow the substitution of vegetables for fruits at breakfast and provides schools with greater menu planning flexibility at breakfast as compared to the previous regulations. Prior to the 2024 final rule, regulations at 7 CFR 220.8(c) and (c)(2)(ii) permitted schools participating in the School Breakfast Program (SBP) to substitute vegetables for fruits at breakfast, provided that the first two cups per week were from specific vegetable subgroups: dark green; red/orange; beans, peas, and lentils; or other.

This memorandum provides updated guidance on the substitution of vegetables for fruits in the SBP. This memorandum supersedes SP06-2020: *School Breakfast Program: Continuation of the Substitution of Vegetables for Fruit Flexibility*, issued January 22, 2020.

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Final Rule Provision

The 2024 final rule provides schools with a straightforward approach to support children's health and help students consume a variety of vegetables:

- Schools choosing to offer vegetables at breakfast in place of fruits **one day** per week may offer vegetables from any vegetable subgroup.
- Schools choosing to offer vegetables at breakfast in place of fruits on **two or more days** per week must offer vegetables from at least two different vegetable subgroups over the course of the week.

Consistent with current regulations and the established breakfast meal pattern, schools are **not required** to offer vegetables at breakfast and may choose to offer only fruits at breakfast.

Starting in school year (SY) 2025-2026, while schools are not required to offer vegetables at breakfast, schools that choose to offer vegetables in place of fruits at breakfast must implement the vegetable variety requirement as outlined in the 2024 final rule and explained above. Schools that plan to substitute vegetables for fruits at breakfast two or more days per week must offer at least two vegetable subgroups in SY 2025-2026.

Congressional Flexibility for SY 2024-2025

On March 9, 2024, Congress provided that school food authorities (SFAs) participating in the SBP may credit any vegetable offered in place of fruit without including vegetable subgroup variety, as outlined in Section 739 of Division B of the Appropriations Act.¹ This provision is effective for SY 2024-2025 and restricts USDA from enforcing the vegetable variety requirements at breakfast. Therefore, for SY 2024-2025, schools are not required to implement the vegetable variety requirement at breakfast that is established in the 2024 final

¹ U.S. Department of Agriculture, Consolidated Appropriations Act, 2024: Effect on Child Nutrition Programs, May 14, 2024. Available at: <https://www.fns.usda.gov/cn/appropriations-act-2024-effect>.

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rule. However, to expose children to the nutrients that come from a variety of vegetables, FNS continues to encourage Program operators to include a variety of vegetables at breakfast.

When the Congressional flexibility for SY 2024-2025 expires on June 30, 2025, the vegetable subgroup variety requirements in the 2024 rule apply. Attachment A addresses questions that FNS has received about this provision of the rule, offers menu planning scenarios, and clarifies the requirements that must be implemented beginning July 1, 2025.

State agencies are reminded to distribute this information to Program operators immediately. Program operators should direct any questions regarding this memorandum to their State agency. State agencies should direct questions to the appropriate FNS Regional Office.

Original Signed

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Attachment A: Questions and Answers

Meal Pattern

1. What are the vegetable subgroups, and where are they identified?

The *Dietary Guidelines* and Federal regulations at [7 CFR 210.10\(c\)\(2\)\(ii\)](#) identify the vegetable subgroups in school meals:

- Dark green
- Red/orange
- Beans, peas, and lentils*
- Starchy
- Other vegetables

The Food Buying Guide for Child Nutrition Programs identifies each vegetable by subgroup. For more information, see Section 2, Vegetables, available at: <https://foodbuyingguide.fns.usda.gov/>.

*Please note that in the 2024 final rule, FNS updated the name of the “legumes (beans and peas)” vegetable subgroup to the “beans, peas, and lentils” vegetable subgroup for consistency with *Dietary Guidelines* terminology.

2. Are schools required to offer vegetables at breakfast?

No. The school breakfast meal pattern requires schools to offer three meal components for a reimbursable meal ([7 CFR 220.8\(c\)](#)):

- Milk;
- Grains and/or meats/meat alternates; and

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- Fruits, which may be substituted with vegetables.

Consistent with previous regulations at 7 CFR 220.8(c)(2)(iii), schools are not required to offer vegetables at breakfast but may choose to offer vegetables toward the fruits component. The 2024 final rule continues to provide schools this optional menu planning flexibility to encourage variety but simplifies the weekly vegetable subgroup requirements for schools choosing to offer vegetables at breakfast.

3. Can a school offer vegetables as an extra item in addition to fruits?

Yes. Schools may offer vegetables at breakfast as an extra item in addition to fruits. As with all extra foods offered, the vegetables must fit within the weekly dietary specifications for calories, saturated fat, sodium, and upon implementation (beginning July 1, 2027), added sugars. If schools offer one or more cups of fruit at breakfast each day, vegetables served in addition to these fruits would not be subject to the vegetable subgroup variety requirements.

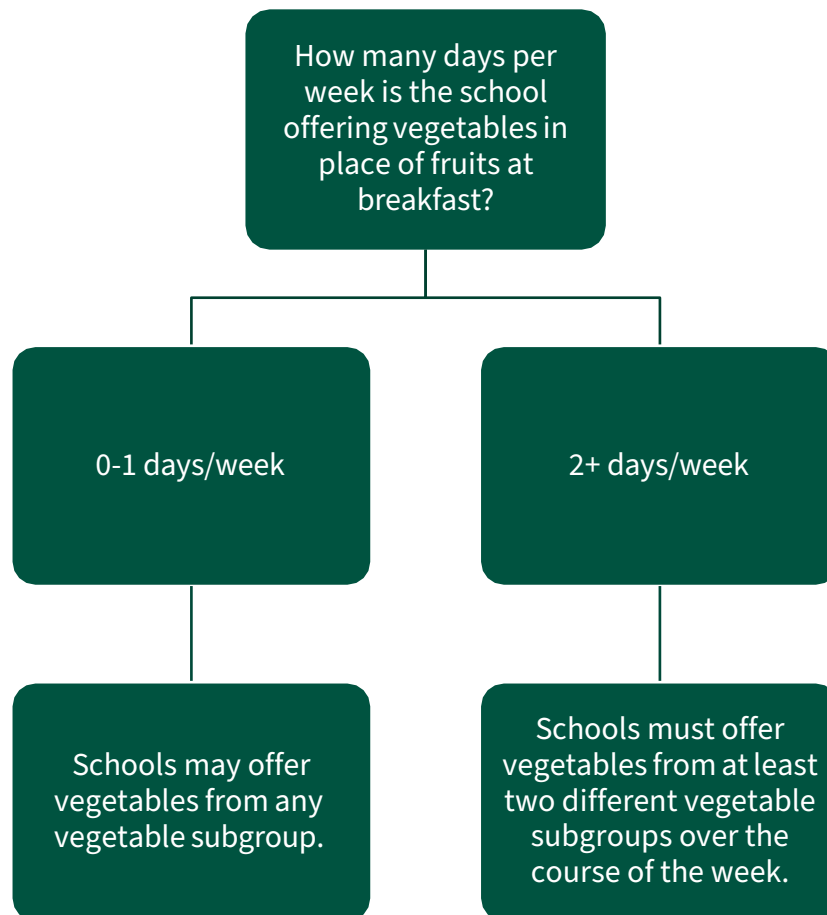
Updated Vegetable Variety Requirement

4. How can schools determine whether they need to offer vegetables from a variety of different vegetable subgroups at breakfast?

The following flowchart helps schools determine what vegetable subgroup variety requirements would apply based on the number of days they plan to offer vegetables in place of fruits at breakfast:

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Figure 1 – How to determine what vegetable subgroup variety requirements apply:



5. May a school choose to offer vegetables in place of fruits at breakfast one day per week?

Yes. Schools choosing to offer vegetables at breakfast in place of fruits **only one day per week** may choose to offer vegetables from **any vegetable subgroup**, including dark green; red/orange; beans, peas, and lentils; starchy; and other vegetables. For example, if a school serves fruit on Monday, Tuesday, Wednesday, and Thursday and wants to offer a vegetable on Friday, any vegetable can be offered.

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6. May a school choose to offer vegetables in place of fruits at breakfast two or more days per week?

Yes. Schools that choose to substitute vegetables for fruits at breakfast on **two or more days per week** are required to offer vegetables from **at least two different vegetable subgroups** during the week. The vegetable subgroups that schools may choose from include dark green; red/orange; beans, peas, and lentils; starchy; and other. The same guidance applies to schools that operate fewer than five days a week or for shorter school weeks due to holidays or school breaks.

After a school offers vegetables from two different subgroups, the school may choose to offer any vegetables—including vegetables from a subgroup the school has already offered that week. For example, if a school offers vegetables from the beans, peas, and lentils vegetable subgroup at breakfast on Monday and vegetables from the starchy vegetable subgroup on Wednesday, the school may offer vegetables from any subgroup on Thursday and/or Friday if they chose to offer vegetables.

The chart below is an example to illustrate how a menu planner can offer vegetables in place of fruits two or more days per week at breakfast.

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Figure 2 – Example of how schools can offer vegetables in place of fruits two or more days per week at breakfast:

Monday	Tuesday	Wednesday	Thursday	Friday
½ cup of strawberries ½ cup of canned orange slices	½ cup of seasonal fresh fruit Breakfast burrito that includes: ½ cup of black beans (beans, peas, and lentils)	½ cup of apple slices ½ cup of hash brown potatoes (starchy)	½ cup of roasted sweet potatoes (red/orange) ¼ cup of raisins	½ cup of grapes ½ cup of 100% apple juice

7. Are schools required to offer the vegetable subgroups at breakfast in any specific sequence during the week?

No. Menu planners have the flexibility to decide when and how to offer a variety of vegetable subgroups at breakfast when substituting vegetables for fruits at breakfast two or more days per week. Vegetable subgroups may be offered on any day(s) of the week and may be repeated as long as two different vegetables subgroups are offered over the course of the week.

For example, a school can offer hash brown potatoes (a starchy vegetable) at breakfast on Monday and Tuesday provided the school offers a different vegetable subgroup that week, such as carrots (a red/orange vegetable) on Thursday.

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8. Can schools offer two different vegetable subgroups on the same day to meet the vegetable subgroup variety requirement?

Yes. Schools may offer two different vegetable subgroups on the same day to meet the vegetable subgroup variety requirement. For example, a school could offer at least two different vegetable subgroups by offering potatoes (starchy vegetable subgroup) and spinach (dark green vegetable subgroup) on the same day.

Crediting

9. What is the daily minimum requirement for vegetables when a school offers vegetables in place of fruits at breakfast?

When substituting vegetables for fruits at breakfast, a school must meet the quantities for each age/grade group as specified in the meal pattern table ([7 CFR 220.8\(c\)](#)) for the fruits meal component. A menu planner may satisfy the quantity requirement for the fruits component by offering 1 cup of fruits, 1 cup of vegetables, or a combination of fruits and vegetables for a total of 1 cup of fruits and/or vegetables offered.

The following chart shows the daily and weekly minimum quantity requirements for the fruits component at breakfast for each grade group, which applies to vegetables when menu planners choose to substitute vegetables for fruits.

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Figure 3 – SBP Fruits Component Requirements:

Grade Group	Daily Minimum Requirement	Weekly Minimum Requirement
K-5	1 cup	5 cups
6-8	1 cup	5 cups
9-12	1 cup	5 cups

Menu planners may allow students to select more than the daily minimum serving for this component if the weekly dietary specifications, including calories, are not exceeded.

10. What is the minimum amount of vegetables that can credit toward the meal pattern when substituting vegetables for fruits?

For fruits and vegetables (including dried fruits and vegetables), the minimum creditable serving size is $\frac{1}{8}$ cup; therefore, a school must offer at least $\frac{1}{8}$ cup of vegetables to meet the requirement to offer a variety of vegetable subgroups. For example, if a meal includes $\frac{1}{8}$ cup of red peppers in an egg casserole and the remainder of the meal component is met with fruits, this fulfills one vegetable subgroup offering (in this case, the red/orange vegetable subgroup) for the week. To expose children to the nutrients that come from a variety of vegetables, FNS continues to encourage Program operators to include a variety of vegetables at breakfast.

For additional information on crediting vegetables, see the Food Buying Guide for Child Nutrition Programs (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>) and Crediting Vegetables in Child Nutrition Programs Tip Sheet (<https://www.fns.usda.gov/tn/crediting-vegetables-child-nutrition-programs-tip-sheet>).

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11. Which vegetables credit differently?

Dried fruit, raw leafy greens, tomato paste, and tomato puree credit differently than most vegetables:

- Dried fruit credits at twice the volume served (e.g., ¼ cup counts as ½ cup).
- Raw, leafy greens credit for half the volume served (e.g., 1 cup counts as ½ cup).
- Tomato paste and tomato puree credit based on the whole food equivalency (volume of tomatoes prior to pureeing) rather than on the actual volume served.

For additional information on crediting vegetables, see the Food Buying Guide for Child Nutrition Programs (<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>) and Crediting Vegetables in Child Nutrition Programs Tip Sheet (<https://www.fns.usda.gov/tn/crediting-vegetables-child-nutrition-programs-tip-sheet>).

12. What vegetables may schools substitute for the fruits component?

Schools may offer fresh, frozen, canned, or dried vegetables from any vegetable subgroup to substitute for the fruits component at breakfast. The Food Buying Guide for Child Nutrition Programs identifies which types of vegetables may be offered. See Section 2, Vegetables: <https://foodbuyingguide.fns.usda.gov/>. For additional information on crediting vegetables, see the Crediting Vegetables in Child Nutrition Programs Tip Sheet (<https://www.fns.usda.gov/tn/crediting-vegetables-child-nutrition-programs-tip-sheet>).

13. Can 100% vegetable juice contribute to a reimbursable meal?

Yes. Up to half of the weekly fruits and vegetables at breakfast may be offered in the form of full-strength (100%) juice. Program operators may obtain a Product Formulation Statement from a manufacturer that shows the amount of specific vegetables included in a vegetable juice. Vegetables present in 100% vegetable juice may credit, and may count toward the weekly vegetable subgroup offerings, as appropriate, provided the minimum creditable amount of ⅛ cup for each subgroup credited is present.

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