



Food and  
Nutrition  
Service

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DATE: April 17, 2019

MEMO CODE: SP 24-2019, CACFP 11-2019, SFSP 10-2019

SUBJECT: Crediting Surimi Seafood 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 surimi seafood in the Child Nutrition Programs (CNP), including the National School Lunch Program (NSLP), School Breakfast Program (SBP), Child and Adult Care Food Program (CACFP), and Summer Food Service Program (SFSP). Surimi seafood is a pasteurized, ready-to-eat, restructured seafood usually made from pollock (fish). Previously, surimi seafood did not meet the requirement for 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 food-crediting guidance to allow surimi seafood to credit as a meat/meat alternate in the CNPs.**

In December 2017, FNS solicited comments on its crediting system through a Request for Information (RFI). FNS sought public input about specific foods, including surimi seafood, due to high interest. FNS asked whether surimi seafood should credit, and if so, how surimi seafood 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 surimi seafood into a reimbursable meal or snack. The comments are available for review at: <https://www.regulations.gov/docket?D=FNS-2017-0044>.

Surimi seafood is available in many forms and shapes, including chunks, shredded, and flaked, and does not require additional preparation. Surimi seafood could be incorporated into a variety of menu items, such as seafood salads, sushi-style rolls, sandwiches, tacos, and ramen. Expanding food crediting in the CNPs to include surimi seafood will allow Program operators to add new and diverse menu items. Surimi seafood credits as of the date of this memorandum; however, FNS will update the *Food Buying Guide for Child Nutrition Programs* to reflect the meal contributions described below. To view the *Food Buying Guide*, please visit <https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>.

**Program operators now may credit surimi seafood as follows:**

- A 4.4 ounce portion of surimi seafood credits as 1.5 ounce equivalent meat/meat alternate;
- A 3.0 ounce portion of surimi seafood credits as 1.0 ounce equivalent meat/meat alternate; and
- A 1.0 ounce portion of surimi seafood credits as 0.25 ounce equivalent meat/meat alternate.

The crediting information is displayed in the chart below:

<b>Surimi Seafood (ounces)</b>	<b>Meat/Meat Alternate (ounce equivalents)</b>
4.4	1.5
3.0	1.0
1.0	0.25

FNS used USDA's Food Patterns Equivalents Database and several industry experts as resources when developing the crediting method for surimi seafood.

Surimi seafood may contain as little as one-third seafood ingredient, and can include other creditable food ingredients. Program operators and manufacturers should note that the crediting ratio for surimi seafood differs based on portion size due to rounding rules that require crediting down to the nearest 0.25 ounces.

As with all products, manufacturers can document formulations of surimi seafood with higher percentages of meat/meat alternate ingredients using a Child Nutrition (CN) Label or a Product Formulation Statement (PFS). For example, a proprietary formulation may have a PFS that documents how 1.0 ounce of surimi seafood contributes 0.5 ounce equivalents meat/meat alternate. To credit surimi seafood differently than what is listed in the chart above, Program operators should obtain a CN label or PFS from the manufacturer. These products may credit based on the creditable ingredient quantities identified in the CN Label or PFS. For more information, please see:

- CN Labeling at <https://www.fns.usda.gov/cnlabeling/child-nutrition-cn-labeling-program>
- The *Manufacturer's Product Formulation Statement* section of the CN Labeling Program website at <https://www.fns.usda.gov/cnlabeling/food-manufacturersindustry>

FNS remains committed to simplifying the menu planning process for all CNP operators, promoting the efficient use of Program funds, and ensuring menu planners and participants have a wide variety of nutritious 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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Policy and Program Development Division