Date: April 3, 1998          Reference #: SNP 98-1
To: Special Nutrition Programs (SNP) Contractors
Subject: Commercial Infant and Other Foods as Reimbursable Meal Components in the Infant Meal Pattern
Effective: Immediately

This policy alert clarifies the reimbursability of certain foods in the Infant Meal Pattern. Because of this new information, Policy Notice SNP #94-22 (dated 7-5-94) "Reimbursement for Commercial Baby Foods Containing Modified Food Starch" is now obsolete. Non-reimbursable foods discussed in this policy alert can still be served, but they cannot count towards meeting meal component requirements.

Policy clarifications and revisions, by food category, are provided below:

I. Fruits and Vegetables (except fruit juice, which is covered in section IV)
   A. Commercial Baby Foods which are reimbursable in the Infant Meal Pattern
      • Commercial baby food fruits and vegetables which list fruit or vegetable as the first ingredient in the ingredient listing on the label.
      • Commercial baby food fruits and vegetables which contain multiple fruits or multiple vegetables, and list fruit or vegetable as the first ingredient in the ingredient listing on the label.

   B. Commercial Baby Foods which are NOT reimbursable
      • Commercial baby food "dinners" which list fruit or vegetable as the first ingredient.
      • Commercial baby foods in the "jarred cereal with fruit category".
      • Commercial baby foods in the "dessert" category (these generally have "dessert" as part of the product name on the front of the label) which list a fruit as the first ingredient in their ingredient listing.
      • Commercial baby food fruits and vegetables which list water as the first ingredient in their ingredient listing.

NOTE: Policy has changed to allow commercial baby foods containing...
modified food starch to be served in the Infant Meal Pattern. However, most products containing modified food starch and other ingredients will still not be reimbursable because the first ingredient in their ingredient listing is water.

II. Meat/Meat Alternates
A. Commercial Baby Foods which are Reimbursable
   • Commercial plain strained baby food meats (including those with beef, chicken, turkey, lamb, veal and ham).
   • Gerber "2nd Foods" baby food meat products (i.e., Beef and Beef Gravy, Chicken and Chicken Gravy, Ham and Ham Gravy, Lamb and Lamb Gravy, Turkey and Turkey Gravy, and Veal and Veal Gravy), even if they do contain additional ingredients, such as cornstarch and, in some cases, lemon juice concentrate.

B. Commercial Foods and Baby Foods which are NOT reimbursable
   • Commercial baby food "combination dinners" because the actual amount of various food components in the dinners is difficult to determine.
   • Meat sticks or "finger sticks" (which look like miniature hot dogs) because they could present a choking risk in infants and, by the manufacturer's declaration, they are designed to match the skills of children over 12 months of age.
   • Commercial fish sticks, other commercial breaded or battered fish or seafood products, canned fish with bones, hot dogs, and sausages, because these foods are not designed by their manufacturers for consumption by infants (less than 12 months of age). Also, infants may choke on these food items and there may be an incidental bone in fish sticks and other breaded fish products.
   • Yogurt is NOT reimbursable, but can be served as an additional food if a parent requests that it be served.
   • Nuts, seeds and nut and/or seed butters, because these foods can cause an infant to choke and can cause allergic reactions in some infants.

III. Bread and Crackers, and Infant Cereals
A. Bread and cracker-type products that are reimbursable
   The following foods, which must be made from whole-grain or enriched meal or flour, are reimbursable in the bread and crackers categories of the Infant Meal Pattern:

   Bread
   • Breads (white, wheat, whole wheat, French, Italian, and
similar breads, all without nuts, seeds, or hard pieces of whole-grain kernels)
- Biscuits
- Bagels (made without nuts, seeds, or hard pieces of whole-grain kernels)
- English muffins
- Pita bread (white, wheat, whole wheat)
- Rolls (white, wheat, whole wheat, potato, all without nuts, seeds or hard pieces of whole-grain kernels)
- Soft tortillas (wheat or corn)

Cracker-type products

- Crackers-saltines or snack crackers made without nuts, seeds, or hard pieces of whole-grain kernels; matzo crackers; animal crackers; graham crackers made without honey (honey, even in baked goods, could possibly contain Clostridium botulinum spores which can cause a type of serious food borne illness in infants)
- Zwieback
- Teething biscuits

NOTE: If any of the above items are served, they must be prepared in a form that is suitable for an infant to use as a finger food and that reduces the chances of choking (e.g., small thin strips of bread are most appropriate, not a whole or half of an uncut hard bagel, English muffin, pita bread, wheat roll, or soft tortilla). It is advisable that these items only be served if parents agree for them to be served, and after they have previously been introduced to an infant, with no problems, by the infant's parents.

It would be inappropriate to serve certain foods in this category to infants because they may contain ingredients which could cause allergies (e.g., pancakes, waffles, or muffins made with whole eggs), cause choking (e.g., hard pretzels, certain cookies, bread sticks, tortilla chips, granola bars, croutons, pieces of crunchy waffles, many ready-to-eat breakfast cereals), or add additional calories without being nutrient-dense foods (e.g., doughnuts, cake, brownies).

B. Cereal that is reimbursable

Infant cereal in the Infant Meal Pattern is defined as "any iron-fortified dry cereal specially formulated for and generally recognized as cereal for infants that is routinely mixed with formula or milk prior to consumption." The
package should include the words, "Cereal for Baby," and the infant cereal should be fortified with iron. The percent Daily Value for iron on the nutrition label must be at least 45%.

C. Cereals that are NOT reimbursable

- Iron-fortified dry infant cereal containing fruit
- Commercial jarred baby food cereals (which are "wet," not "dry")
- Ready-to-eat breakfast cereal (cold dry) and cooked breakfast cereals (such as farina or oatmeal). Although enriched farina, regular oatmeal, and corn grits, for example, are not reimbursable, they can be fed as additional foods if the parent requests that they be served. Do not feed ready-to-eat cold or cooked breakfast cereals with nuts, seeds, raisins and hard pieces of whole-grain kernels or other hard food pieces to infants because they pose a choking risk.

IV. Fruit Juice

Full-strength fruit juice (regular or infant juice) is the only type of juice product which qualifies for reimbursement as a snack for infants 8 through 11 months of age in the Infant Meal Pattern. Although not specified in the regulations, it is recommended that if juice is served, the following types of juice be selected:

- Fruit juice containing or fortified with Vitamin C (Vitamin C promotes the body's absorption of iron in food.)
- Only pasteurized fruit juice. Some kinds of juice and cider have not been pasteurized and may contain harmful bacteria. Frozen concentrate, shelf stable juice in hermetically-sealed containers, including infant juices, and canned juices are processed or pasteurized to eliminate harmful bacteria.

NOTE: Vegetable juices and fruit juices with yogurt are NOT reimbursable in the Infant Meal Pattern because, by regulation, only full-strength fruit juice is reimbursable. Although these products are NOT reimbursable, they can be served as additional foods if a parent requests that they be served.

Check with parents to be certain that an infant has tried, and had no reaction to, baby food products before serving them. This would include, but is not limited to the following:

- Baby food products containing multiple fruits or vegetables and other ingredients (such as milk, nonfat dry milk, whole milk solids, cheese, whey, wheat flour or other wheat products,
tomato, corn).

- A meat product and any other ingredient besides the meat (such as cornstarch which could be a problem if an infant is allergic to corn).

Request that parents furnish a statement signed by a recognized medical authority if their infant is allergic to, and should not be fed, certain foods or ingredients. The statement must be signed by a licensed physician if the allergy is severe and life-threatening. The statement should include the medical or other special dietary need which restricts the infant's diet, the food or foods to be omitted from the infant's diet, and the food or foods to be substituted.

It is highly recommended that written instructions be obtained from parents, who, in consultation with their infant's doctor, request that certain optional or additional foods be fed or specifically not be fed to their infants.