



Massachusetts Department of Elementary and Secondary Education

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Jeffrey C. Riley
Commissioner

MEMORANDUM

To: Child Nutrition Program Operators
From: Robert Leshin, Director, Office for Food and Nutrition Programs
Date: October 15, 2019
Subject: UPDATE: Choking Prevention Policy: Nutrition for Young Children (Under the age of four)

This Choking Prevention Policy supersedes the Choking Prevention Policy distributed by FNP on March 26, 2019. This policy is being issued to provide clarity concerning different food items: kiwi fruits and kiwi berries as well as nut/seed butters. New information has been highlighted in yellow.

FNP's Choking Prevention Policy of March 2019 included kiwi on the list of foods to be restricted to children under the age of four. Due to questions received regarding kiwi fruit vs kiwi berries, FNP has separately identified these two different food items on the list of foods restricted for children under the age of four due to the texture and size, respectively. Both items must not be served to children under the age of four.

Additionally, since seed butters have the same/similar consistency to peanut butters and nut butters, FNP considers these food items to be a choking hazard and has included them in the restricted items list. The memo language reflects the language and information distributed in training and technical assistance provided by FNP.

The Choking Prevention Policy distributed by FNP on March 26, 2019 was due to the issuance of the United States Department of Agriculture (USDA) Memorandum "Update of Food Crediting in the Child Nutrition Program" SP 08-2019, CACFP 02-2019, SFSP 02-2019 DATED December 4, 2018. In this memorandum, Food and Nutrition Services (FNS) allows the following items to credit towards a reimbursable meal in Child Nutrition Programs (CNPS).

- Shelf stable, dried and semi-dried meat, poultry, and seafood snacks (such as beef jerky or summer sausage)
- Coconut, hominy, popcorn, surimi seafood, and tempeh

Due to their shape and texture, shelf-stable, dried and semi-dried meat, poultry, and seafood snacks (such as beef jerky or summer sausage) as well as popcorn have been added to the list of foods that are not to be served to children under the age of four.

CNP Operators participating in the Child and Adult Care Food Program (CACFP), National School Lunch Program (NSLP), School Breakfast Program (SBP), and Summer Food Service Program (SFSP) must not offer to children under four years of age foods that pose the highest risk of choking.

FNP's policy applies to CACFP Centers, Day Care Homes (DCH), School Food Authorities (SFA), and SFSP sites serving children under four years of age.

Choking Prevention: Nutrition for Young Children

Based on guidance from USDA*, foods that pose the highest risk for choking are foods that possess the following characteristics: 'round, tube-shaped, small, hard, thick and sticky, smooth, slippery, or easily molded to the airway'.

In order to align with Massachusetts state licensing and USDA's recommendations, FNP's policy restricts the serving of the following foods to children under four years of age:

- Hot Dogs, sausages, sausage links or similar processed food items
- Grapes, cherries, melon balls, kiwi fruit, cherry and grape tomatoes
- Specific berries- kiwi berries, raspberries, blackberries, goji berries
- Peanuts, nuts and seeds (for example, sunflower or pumpkin seeds)
- Peanut butter and nut/seed butters
- Dried fruit such as raisins or cranberries
- Shelf stable, dried and semi-dried meat, poultry, seafood snacks (such as beef jerky or summer sausage)
- Popcorn

There are many items that are not included in the above list, which may still pose a choking hazard due to their shape or texture. FNP asks CNP operators to consider the aforementioned characteristics when feeding children under the age of four and alter any food items that may pose a risk. CNP operators shall alter food items so that they can be served in manageable bites, no larger than a nickel in size, to pre-school age, toddlers and infant age groups.

* <https://www.nutritionnc.com/snp/pdf/cacfp/ChokingPreventionTeamNutrition.pdf>

To clarify, the foods listed in the bulleted list are not to be served to children under the age of four, even using alternate food preparation methods. The information about alternate food preparation methods relates only to other foods nor specifically identified.

Vended Meals or Contracts

Operators that enter into a contract to purchase meals from a food service vendor are responsible for ensuring that meals and snacks comply with FNP choking prevention policy.

Please share FNP's policy guidance ensuring that meals received meet the requirements for serving children under the age of four years old.

Implementation timeframe

CACFP to implement in FY2018, NSLP and SBP to implement in FY2019 (July 1, 2018), and SFSP to implement in FY2018.

The list of foods not to be served to young children will continue to be expanded as FNS issues additional guidance. As new foods are added to the list, implementation of restrictions should be immediate.

If you have any questions or need further assistance, please contact FNP at 781-338-6480 or email nutrition@doe.mass.edu

May 10, 2018

Revised March 26, 2019

Revised October 15, 2019

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