

Crediting **Grains** in the **Child Nutrition Programs**

Tip Sheet

Part 2: Identifying Grain Products That Are Whole Grain-Rich



Whole grain-rich products are required in the National School Lunch Program (NSLP), the School Breakfast Program (SBP), Preschool, and the Child and Adult Care Food Program (CACFP) (with the exception of infants). Whole grain-rich items are not required in the Summer Food Service Program (SFSP) and the NSLP Afterschool Snack Service. This tip sheet provides helpful information to determine whether a grain product meets the whole grain-rich criteria.

What Does Whole Grain-Rich Mean?

“**Whole grain-rich**” is a term used by the U.S. Department of Agriculture’s Food and Nutrition Service (FNS) and only refers to criteria for meeting the grains requirement for the NSLP, SBP, Preschool, and CACFP. The term is not found on product labels and should not be confused with the U.S. Food and Drug Administration’s (FDA) whole grain health claim.



- Whole grain-rich foods are those that are 100 percent whole grain or at least 50 percent whole grain meal and/or flour. Any remaining meal/flour must be enriched, bran, or germ. One ounce equivalent (oz eq) of grains products, such as crackers, bread, bagels, and pancakes (represented in **Exhibit A: Grain Requirements for Child Nutrition Programs (CNP)**, Groups A – G), contains 16 grams of creditable grain. To be whole grain-rich, these products must contain at least 8 grams of whole grain per oz eq¹.



- One oz eq of grains products, such as cereal grains, pasta, and ready-to-eat (RTE) cereal (represented in **Exhibit A: Grain Requirements for CNP**, Groups H & I), contains 28 grams of creditable grain. To be whole grain-rich, these products must contain at least half the volume or dry weight (14 grams) as whole grain per oz eq¹.

¹ For details on ounce equivalents, see **Crediting Grains in Child Nutrition Programs Tip Sheet, Part 3: Program Requirements.**

When evaluating for meal requirements



- Nixtamalized corn ingredients (i.e., corn treated with lime, such as hominy, corn masa, and masa harina) are considered whole grains.



- Bran and germ ingredients are considered enriched grains.



See [Crediting Grains in Child Nutrition Programs Tip Sheet, Part 1: Creditable Grains in Child Nutrition Programs](#) for more information on crediting grains in the CNP.

Whole Grain-Rich Requirement in CNP

- In the **NSLP and SBP**, at least **80 percent of the grain products offered per week** must be whole grain-rich. The remaining grain products must be enriched.

Calculating the percent of whole grain-rich products offered in a week:

Sum of All Whole Grain-Rich Grain Products (oz eq) ÷ Sum of All Grains Products (oz eq)

Ex. 10 oz eq for All Whole Grain-Rich Products ÷ 12 oz eq for All Grain Products = 83 percent of the Weekly Grains Offered are whole grain-rich

- In **Preschool and CACFP**, at least **one serving of grains per day** across all eating occasions, including snack, must be whole grain-rich for child and adult participants. The CACFP infant meal pattern does not have a whole grain-rich requirement.
- The SFSP and NSLP Afterschool Snack Service do not have a whole grain-rich requirement.

How do I know if a product is whole grain-rich?

For School Meals (NSLP & SBP) Use Product Ingredient Statements

Non-mixed dishes (such as bread or cereal)

Ingredient statements list ingredients in descending order by weight, so the ingredient that weighs the most is listed first. A grain product that lists a whole grain as the primary ingredient by weight (or as the second ingredient after water) and in which the remaining grains are enriched meets the whole grain-rich criteria. In some cases (See Sample B on p. 3), a Product Formulation Statement (PFS) is needed from the manufacturer to determine if the whole grains weighs equal to or more than the enriched grains in the product. A PFS indicates how the product contributes to the CNP meal pattern requirements. Non-creditable grains that are present in insignificant amounts (less than 2 percent by weight) can be disregarded.



Sample A: Flatbread Ingredient Statement

INGREDIENTS: **Stoneground whole wheat flour**, water, **enriched flour** (wheat flour, malted barley flour, niacin, iron, thiamin mononitrate, riboflavin, folic acid), soybean oil, yeast, salt, contains 2% or less of: sugar, dough conditioner (cultured wheat, mono- and diglycerides, sodium stearoyl lactylate, guar gum, enzymes, l-cysteine), leavening (sodium bicarbonate, monocalcium phosphate, sodium acid pyrophosphate), wheat starch, wheat protein, lactic acid, natural flavors, canola oil, calcium propionate (preservative)

In Sample A, the first grain ingredient listed is stoneground whole wheat flour and the second grain ingredient listed is enriched flour. Stoneground whole wheat flour is listed first, so this whole grain *weighs more* than the enriched flour. Because there are only two grain ingredients in this flatbread and the whole grain weighs more than the enriched grain, the stoneground whole wheat flour makes up at least 50 percent of the total grain ingredients. Therefore, this item meets the whole grain-rich criteria.

Cultured wheat and *wheat starch*, which are non-creditable grains, are present in insignificant amounts (less than 2 percent of weight) and can be disregarded.



See [Crediting Grains in Child Nutrition Programs Tip Sheet, Part 1: Creditable Grains in Child Nutrition Programs](#) for a list of both creditable and non-creditable grains.

Sample B: Flatbread Ingredient Statement

INGREDIENTS: **Enriched flour** (wheat flour, malted barley flour, niacin, iron, thiamin mononitrate, riboflavin, folic acid), **stoneground whole wheat flour**, **whole oats**, water, soybean oil, yeast, salt, contains 2% or less of: wheat gluten, sugar, dough conditioner (cultured wheat, mono- and diglycerides, sodium stearoyl lactylate, guar gum, enzymes, l-cysteine), leavening (sodium bicarbonate, monocalcium phosphate, sodium acid pyrophosphate), wheat starch, wheat protein, lactic acid, natural flavors, canola oil, calcium propionate (preservative)

When a whole grain is not listed as the first ingredient, the primary grain ingredient(s) by weight must be whole grain(s) for the product to be considered whole grain-rich. If there are multiple whole grain ingredients, their combined weight must be more than the weight of the enriched grain ingredients for the product to be considered whole grain-rich. In Sample B, there are three grain ingredients: enriched flour, stoneground whole wheat flour, and whole oats. Although the enriched grain is listed first, the weight of the whole grain ingredients combined may be at least 50 percent of the total grains weight.

To determine the percent weight of the grain ingredients, you need to request a PFS from the manufacturer.

The PFS received from the manufacturer confirmed that the combined weight of the whole grains is 60 percent of the weight of the grain ingredients (30 percent stoneground whole wheat flour and 30 percent whole oats) and the enriched flour is 40 percent; therefore, this product meets the whole grain-rich criteria.



Flour blends

For grain products with flour blends, such as in the example below, the Program operator needs documentation from the manufacturer showing

that the whole grain content is at least 8 grams per oz eq or that the combined weight of the whole grain ingredients is greater than the first ingredient listed after the flour blend (ex. honey), in order to determine if the whole grain is the primary ingredient by weight and meets the whole grain-rich criteria.

INGREDIENTS: Flour blend (whole wheat flour, enriched wheat flour, enriched corn flour), honey . . .

Mixed dishes (such as a pizza or burrito)

To determine if a product meets the whole grain-rich criteria, only the grains portion of the ingredient label needs to be considered. For example, the pizza bagel ingredient statement to the right lists the bagel, sauce, and topping separately.

The crust (bagel) is not a creditable grains product, since the first ingredient, organic wheat flour, is not whole grain, enriched, bran or germ. Organic whole wheat flour is listed as the second ingredient and therefore weighs less than the organic wheat flour. Remember, non-creditable grains must be less than 2 percent of the product weight.

INGREDIENTS: BAGEL HALF: (organic wheat flour, organic whole wheat flour, water, organic vital wheat gluten, organic cane sugar, sea salt, yeast, organic potato starch, organic white distilled vinegar). **SAUCE:** Water, organic tomato paste, corn starch, organic cane sugar, sea salt, organic seasoning (organic onion powder, organic garlic powder, organic basil, organic black pepper, organic oregano). **TOPPING:** Organic low-moisture part-skim mozzarella cheese (organic pasteurized part-skim milk, cheese cultures, sea salt, vegetable enzymes), cheddar cheese (pasteurized enzymes), cheddar cheese (pasteurized milk, cheese cultures, sea salt, vegetable enzymes), organic rice flour.



Ready-to-eat (RTE) breakfast cereals must list a whole grain as the primary ingredient, and the cereal must be fortified to be considered whole grain-rich. RTE breakfast cereals that are 100 percent whole grain and do not contain other refined grains are not required to be fortified. These unfortified, 100 percent whole grain, RTE breakfast cereals sometimes contain an insignificant amount (less than 2 percent by weight) of non-creditable, refined grains and can still be credited.

Use Existing Documentation

A **Child Nutrition (CN) label** crediting statement that indicates the product credits toward the grains component, as in the first example below, ensures that the product is whole grain-rich. If the crediting statement includes “grains (enriched),” as in the second example below, then the product credits toward the grains component in CNP, but does not meet the whole grain-rich criteria.

Whole-Grain Bean and Cheese Burrito

Ingredient Statement: Whole-wheat flour tortilla, pinto beans, American cheese, green chili, onion, chili powder, salt.

CN

XXXXXX

CN

Each 4.50 oz. Whole-Grain Bean and Cheese Burrito provides 2.00 oz. equivalent meat alternate and 2.00 oz. equivalent grains **OR** 1.00 oz. equivalent meat alternate, 2.00 oz. equivalent grains, and 1/4 cup legume vegetable for Child Nutrition Meal Pattern Requirements. (Use of this logo and statement authorized by the Food and Nutrition Service, USDA mm/yy).

CN

CN

Net Wt.: 27.0 pounds

HJK Foods, Inc
1234 Green Street Leafville, PA 12345

Egg and Cheese Breakfast Wrap

Ingredient Statement: Enriched flour tortilla, eggs, Monterey jack cheese, American cheese, chipotle chili pepper, spices.

CN

XXXXXX

CN

Each 3.50 oz. Egg and Cheese Breakfast Wrap provides 1.00 oz. equivalent meat alternate and 1.00 oz. equivalent grains (enriched) for Child Nutrition Meal Pattern Requirements. (Use of this logo and statement authorized by the Food and Nutrition Service, USDA mm/yy).

CN

CN

Net Wt.: 19.0 pounds

WXW Company
1234 Maroon Street Cypress, PA 12345

Use Existing Documentation (continued)

A **Product Formulation Statement (PFS)**, supplied by the manufacturer, may be used to determine if the grain product is whole grain-rich and ensure the grams of non-creditable grain ingredients are less than 2 percent of the product weight (or less than 0.25 oz eq).

USDA
United States Department of Agriculture

Food and Nutrition Service

**Product Formulation Statement for Documenting Grains
in Child Nutrition Programs**
(Crediting Standards Based on Grams of Creditable Grains (ounce equivalent))

Program operators should include a copy of the label from the purchased product package in addition to the following information on letterhead signed by an official company representative. Program operators have the option to choose the crediting method that fits their specific menu planning needs.

Product Name: _____ Code No.: _____

Manufacturer: _____ Serving Size: _____
(raw dough weight may be used to calculate creditable grains)

I. Does the product meet the whole grain-rich criteria? Yes _____ No _____

II. Does the product contain non-creditable grains? Yes _____ No _____ **How many grams?** _____
(Products with more than 0.24 ounce equivalent (oz eq) or 3.99 grams (g) for Groups A-G or 6.99g for Groups H and I of non-creditable grains do not credit toward the grains requirement for school meals.)

Any State agency's Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)-approved whole grain food list contains products that meet the whole grain-rich criteria:
<https://www.fns.usda.gov/fns-contacts/wic>.

USDA Standardized Recipes (<https://theicn.org/cnrb/>) include crediting statements. For recipes that credit toward the grains component, check the grain ingredient amounts to make sure they are at least **50 percent whole grain** to ensure the recipe is **whole grain-rich**.

Use Product Packaging

Products with one of the following U.S. Food and Drug Administration (FDA) approved health claims, exactly as written, on the packaging meet the whole grain-rich criteria:

✓ *"Diets rich in whole grain foods and other plant foods and low in total fat, saturated fat and cholesterol may reduce the risk of heart disease and some cancers."*

✓ *"Diets rich in whole grain foods and other plant foods and low in saturated fat and cholesterol, may help reduce the risk of heart disease."*

Products labeled with the following names have a Standard of Identity issued by FDA that meets the whole grain-rich criteria:

Breads with these exact product names...

- Whole-wheat bread
- Entire wheat bread
- Graham bread
- Whole-wheat rolls
- Entire wheat rolls
- Graham rolls
- Whole-wheat buns
- Entire wheat buns
- Graham buns

Pasta with these exact product names...

- Whole-wheat macaroni products
- Whole-wheat macaroni
- Whole-wheat spaghetti
- Whole-wheat vermicelli

For CACFP & Preschool

Use NSLP Criteria

If the product meets NSLP's criteria for whole grain-rich using any of the methods previously described, then it also meets the whole grain-rich criteria for CACFP and Preschool.

or

Use the *Rule of Three*

The *Rule of Three* was developed to help CACFP operators who may purchase food from retail environments and may not have access to manufacturers' PFS or products formulated for School Meal Programs.

- 1 To meet the *Rule of Three* criteria, the first ingredient (or the second ingredient after water) must be whole grain and the next two grain ingredients (if any) must be whole grains, enriched grains, bran, or germ.
- 2 When applying the *Rule of Three* to mixed dishes, only consider the grain portion of the mixed dish. The first grain ingredient must be whole grain and the next two grain ingredients (if any) must be whole grain, enriched grain, bran or germ.
- 3 When applying the *Rule of Three* to RTE breakfast cereals, if the first grain ingredient is a whole grain and the cereal is fortified, the product meets the whole grain-rich criteria. There is no need to look at any other grain ingredients in the cereal.

Grain derivatives, which are generally present in small amounts, do not count as grain ingredients and can be ignored.

Grain Derivatives in the CACFP

- corn starch
- corn dextrin
- modified food starch
- rice starch
- tapioca starch
- wheat dextrin
- wheat gluten
- wheat starch

Any non-creditable grain ingredients, such as wheat flour or rice flour, that are labeled as less than 2 percent in the ingredients list are considered insignificant and may also be ignored.

NOTE: In the CACFP and Preschool, the only time non-creditable grains need to be considered is when using the *Rule of Three*.

Wheat Breadsticks

Looking at this label, we see that this grain product is whole grain-rich using the *Rule of Three*. The first grain ingredient is *whole-wheat flour*, the second grain ingredient is *enriched unbleached wheat flour*, and the third grain ingredient is *wheat gluten*, which is a grain derivative and can be ignored; therefore, this product meets the whole grain-rich criteria.

INGREDIENTS: **Whole-wheat flour**, water, **enriched unbleached wheat flour**. Yeast, sugar. Contains less than 2% of **wheat gluten**, soybean oil, salt, oat fiber, honey, sodium stearoyl lactylate, datem, acesulfame potassium, ascorbic acid, enzyme

See [Identifying Whole Grain-Rich Foods For the CACFP](https://www.fns.usda.gov/tn/identifying-whole-grain-rich-foods-cacfp) for additional information (<https://www.fns.usda.gov/tn/identifying-whole-grain-rich-foods-cacfp>)



For additional information on using whole grain-rich products in the CACFP, see these worksheets: <https://www.fns.usda.gov/tn/meal-pattern-training-worksheets-cacfp>



Test Your Knowledge

Yes or No

1. Using the name on the product label, is this product whole grain-rich based on FDA's Standard of Identity?

Yes No



2. These strawberry pancakes are served at Liberty Elementary School (K-5).

Serving size = 2 pancakes (70 grams)

INGREDIENTS: Water, whole wheat flour, enriched wheat flour (unbleached wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid), soybean oil, cane sugar contains 2% or less: baking powder, barley malt, salt, strawberries, guar gum, soy lecithin.

Based on the label, is this product whole grain-rich?

Yes No



3. Sunrise Day Care Center cares for children ages 3 through 5 years old. The Program operator purchased the following cracker product to serve at snack.

INGREDIENTS: Unbleached enriched flour (wheat flour, niacin, reduced iron, thiamine mononitrate [vitamin B1], riboflavin [vitamin B2], folic acid, whole grain wheat flour, canola oil, sugar, palm oil, leavening (calcium phosphate, baking soda), salt, high fructose corn syrup, soy lecithin. CONTAINS: WHEAT, SOY.

Is this cracker whole grain-rich in the CACFP using the *Rule of Three*?

Yes No





Answers

1. Using the name on the product label, is the product whole grain-rich based on FDA's Standard of Identity?

- Yes
- No. The term “whole-wheat cereal” does not have a Standard of Identity issued by FDA. The product name cannot be used and you would need to refer to the ingredient statement to determine if the product is whole grain-rich.**



2. These strawberry pancakes are served at Liberty Elementary School (K-5).

Serving size = 2 pancakes (70 grams)

INGREDIENTS: Water, **whole wheat flour**, **enriched wheat flour** (unbleached wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid), soybean oil, cane sugar contains 2% or less: baking powder, barley malt, salt, strawberries, guar gum, soy lecithin.

Based on the label, is this product whole grain-rich?

- Yes. There are two grain ingredients in this product. Both are creditable. The first is whole wheat flour and the second is enriched wheat flour. Since the first is whole wheat flour, the product has at least 50 percent whole grain by weight. Remember, ingredients are listed in descending order by weight.**
- No



3. Sunrise Day Care Center cares for children ages 3 through 5 years old. The Program operator purchased the following cracker product to serve at snack.

INGREDIENTS: **Unbleached enriched flour** (wheat flour, niacin, reduced iron, thiamine mononitrate {vitamin B1}, riboflavin {vitamin B2}, folic acid), **whole grain wheat flour**, canola oil, sugar, palm oil, leavening (calcium phosphate, baking soda), salt, high fructose corn syrup, soy lecithin. CONTAINS: WHEAT, SOY.

Is this cracker whole grain-rich in the CACFP using the *Rule of Three*?

- Yes
- No. When using the *Rule of Three*, the first ingredient (or the second ingredient after water) must be whole grain and the next two grain ingredients (if any) must be whole grain, enriched, bran, or germ. For this cracker, the first ingredient is enriched, the second grain ingredient is whole grain, and there is no third grain ingredient; therefore, this cracker is not whole grain-rich. However, in CACFP, only one grains serving per day must be whole grain-rich. This cracker could still be served as part of a reimbursable meal, if a whole grain-rich product is also served during that day.**

