



Food and  
Nutrition  
Service

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DATE: October 19, 2017

MEMO CODE: CACFP 01-2018

SUBJECT: Grain Requirements in the Child and Adult Care Food Program;  
Questions and Answers

TO: Regional Directors  
Special Nutrition Programs  
All Regions

State Directors  
Child Nutrition Programs  
All States

This memorandum explains the grain requirements for the Child and Adult Care Food Program (CACFP). This revision clarifies how to determine if a grain product is creditable and if it meets the whole grain-rich criteria, and provides updated guidance on how to document compliance with the grain requirements. It also includes an updated “Exhibit A: Grain Requirements for Child Nutrition Programs” in Attachment 1 and updated Questions and Answers in Attachment 2. This memorandum supersedes CACFP 02-2017, *Grain Requirements in the Child and Adult Care Food Program; Questions and Answers*, October 14, 2016.

## Background

On April 25, 2016, USDA’s Food and Nutrition Service (FNS) published the final rule “Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010”. The final rule amended the CACFP regulations at 226.20 to update the meal pattern requirements. CACFP centers and day care homes had to start complying with the updated meal pattern requirements on October 1, 2017.

This memorandum explains the grain requirements established in the final rule, including information on whole grain-rich foods, grain-based desserts, and the breakfast cereal sugar limit. Although FNS’ goal is to streamline guidance and align Child Nutrition Programs to the extent possible, the agency recognizes that CACFP operates differently than the National School Lunch Program and National School Breakfast Program (School Meal Programs). Due to the distinguishing nature of the CACFP, and because the CACFP meal patterns were designed to be cost neutral, there are some instances when the guidance for the CACFP is different than the guidance for the School Meal Programs.

The final rule also requires that grains be credited using ounce equivalents (oz eq) instead of “servings,” as credited under the previous meal pattern requirements. This change is consistent with the Dietary Guidelines. In recognizing that this requires a significant

operational change for centers and day care homes, FNS is delaying the implementation of oz eq until October 1, 2019. FNS will issue additional guidance on oz eq in the future.

## **I. REQUIREMENTS**

As a reminder, it remains a requirement that all grain products served in the CACFP must be made with enriched or whole grain meal or flour (7 CFR 226.20(a)(4)(i), or bran or germ. Grain is a required component at breakfast, lunch and supper meals, and is optional at snack.

### **Enriched Grains**

Enriched grains are grains that have certain B vitamins and iron added back to them after processing. There are two simple ways to determine if a grain is enriched. The following checklist can be used to determine if a grain is enriched. The food must meet at least one of the following in order to be creditable:

1.  The food is labeled as enriched.
2.  An enriched grain is listed as the first ingredient on the food's ingredient list, or second after water. The label will usually say "enriched flour" or "enriched wheat flour," or there is a sub-listing of nutrients used to enrich the ingredient. For example, in this ingredient list, the yellow corn flour has a sub-list of nutrients used to enrich it: "whole wheat flour, yellow corn flour {folic acid, riboflavin, niacin, and thiamine}".

Breakfast cereals that are fortified are also creditable. Please see question number 2 under "III. BREAKFAST CEREALS" in the attached Questions and Answers for more information on how to identify fortified cereals.

### **Whole Grain-Rich**

Under the updated meal patterns, at least one serving of grains per day must be whole grain-rich (7 CFR 226.20(a)(4)(i)(A)). Foods that meet the whole grain-rich criteria are foods that contain 100 percent whole grains, or that contain at least 50 percent whole grains and the remaining grains in the food are enriched. This whole grain-rich requirement only applies to meals served to children and adults; it does not apply to infant meals.

There are four simple ways to determine if a grain product meets the whole grain-rich criteria. The following checklist can be used to decide if a grain is whole grain-rich. The food must meet at least one of the following:

1.  The food is labeled as "whole wheat".

Grain products that are specifically labeled as "whole wheat bread", "entire wheat bread", "whole wheat rolls", "entire wheat rolls", "whole wheat buns", and "entire wheat buns" are 100 percent whole wheat and meet the whole grain-rich criteria.

Please see Question 12 under “I. WHOLE GRAIN-RICH” in the attached Questions and Answers for more information.

2.  A whole grain is listed as the first ingredient on the food’s ingredient list (or second after water), and the next two grain ingredients are creditable (whole or enriched grains, bran, or germ). Please see the next section *Non-Creditable Grains* for more information about the *rule of three*.

Some examples of whole grain ingredients are whole wheat, brown rice or wild rice, oatmeal, bulgur, whole-grain corn, and quinoa.

3.  The product includes one of the following Food and Drug Administration approved whole-grain health claims on its packaging:

“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.”

OR

“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.”

FNS is allowing the FDA whole grain health claims to be sufficient documentation to demonstrate compliance with the whole grain-rich criteria in the CACFP, only. The FDA whole grain health claims are not sufficient documentation to demonstrate a grain is whole grain-rich in the School Meal Programs.

4.  Proper documentation (from a manufacturer or a standardized recipe) demonstrates that whole grains are the primary grain ingredient by weight.

When a whole grain is not listed as the first ingredient, the primary ingredient by weight may be whole grain if there are multiple whole-grain ingredients and the combined weight of those whole grains is more than the weight of the other ingredients. For example, bread may be made with three grain ingredients: enriched wheat flour (40 percent of grain weight), whole-wheat flour (30 percent of grain weight) and whole oats (30 percent of grain weight). The combined weight of the two whole-grain ingredients (whole wheat and whole oats at 60 percent) is greater than the enriched wheat flour (at 40 percent), even though the enriched wheat flour is listed first on the ingredient list. This bread could meet the whole grain-rich criteria with proper documentation from the manufacturer or a standardized recipe, for foods prepared by a CACFP center or day care home.

If the first ingredient (or second after water) on a grain food’s (e.g., breads and rolls) ingredient list or the grain portion of a mixed product’s (e.g., breaded chicken patties) ingredient list is not

whole grain or enriched, centers and day care homes must request proper documentation from a manufacturer demonstrating the primary grain ingredient by weight is whole grain to decide if the product meets the whole grain-rich criteria.

### *Non-Creditable Grains*

Whole grains, enriched grains, bran, and germ are creditable grains in the CACFP. Other grain ingredients are considered non-creditable. There may be times when non-creditable grains appear in the ingredient list of a food. Some examples of non-creditable grain ingredients include: bromated flour, durum flour, white flour, wheat starch, corn starch, modified food starch, and vegetable flours (e.g., potato and legume flours). Non-creditable grains in insignificant amounts are acceptable. To the extent possible, centers and day care homes should choose foods with an insignificant amount of non-creditable grains.

When identifying creditable grain products, centers and day care homes should use the *rule of three*: make sure the first grain ingredient (or second after water), is whole or enriched, and the next two grain ingredients (if any) are whole grains, enriched grains, bran, or germ. If the product has the statement “contains 2% or less,” any ingredients listed after that are considered insignificant. They do not need to be considered in the *rule of three*. For example, an ingredient list may state “contains less than 2% of wheat flour and corn starch.” In this example, the wheat flour and corn starch can be disregarded.

Grains and non-grains may be mixed together on an ingredient list. For example, a bread ingredient list may say: “water, whole wheat flour, yeast, sugar, enriched white flour, wheat gluten, brown rice flour, salt.” In this example, the first ingredient after water is a whole grain. The second grain ingredient is an enriched grain, and the third grain ingredient is a whole grain. This bread passes the *rule of three* test. It also meets the whole grain-rich criteria because the first ingredient after water is a whole grain. Centers and day care homes do not need to check any other grain ingredients further down on the ingredient list to verify if they are creditable. Also, there is no need to use the *rule of three* for ready-to-eat breakfast cereals that are fortified. If a ready-to-eat breakfast cereal has a whole grain as the first ingredient (or second after water), and it is fortified, it meets the whole grain-rich criteria. Please see questions 3, 4, 5, 6, and 7 under “I. WHOLE GRAIN-RICH” in the attached Questions and Answers for more information on the *rule of three*.

State agencies have the discretion to determine what documentation is acceptable to demonstrate that a grain contains an insignificant amount of non-creditable grains. FNS encourages State agencies to continue to use the methods they currently have in place to determine if grains are creditable.

### *Child Nutrition Labels*

Manufacturers may apply for a Child Nutrition (CN) Label for qualifying products to indicate the number of oz eq that meet the whole grain-rich criteria. The term “oz eq grains” on the CN Label indicates that the product meets the whole grain-rich criteria. While FNS is not implementing oz

eq in CACFP until October 1, 2019, grain products with a CN Label indicating the number of oz eq that meet the whole grain-rich criteria do contribute to the CACFP meal pattern requirements as declared on the CN Label. This is because an oz eq is slightly heavier (16 grams of grains) than a serving size for CACFP (14.75 grams of grains). Therefore, the oz eq meets the minimum quantity for the CACFP grain component. Please refer to the CN Labeling Program website for more information about qualifying products (e.g., entrée items with at least 0.50 oz eq of meat/meat alternate) at <https://www.fns.usda.gov/cnlabeling/child-nutrition-cn-labeling-program>.

### **Grain-Based Desserts**

The Dietary Guidelines recommend limiting consumption of added sugars and saturated fats as part of a healthy eating pattern. It identifies grain-based desserts as sources of added sugars and saturated fats. To better align the CACFP meal patterns with the Dietary Guidelines, grain-based desserts cannot count towards the grain requirement at any meal or snack (7 CFR 226.20(a)(4)(iii)). This will help reduce the amount of added sugars and saturated fats that children and adults consume.

FNS gathered extensive feedback from stakeholders on how to define grain-based desserts. FNS concluded that using categories to define grain-based desserts, instead of establishing nutrient standards, is the best approach for the CACFP. Therefore, grain-based desserts are those items that are denoted with a superscript 3 or 4 in Exhibit A (Attachment 1) of this memorandum.

The Exhibit A in the previous version of this memorandum (CACFP 02-2017) included sweet crackers (e.g., graham and animal crackers) as grain-based desserts. However, based on further stakeholder feedback, FNS decided some flexibility was needed and issued policy memorandum CACFP 16-2017, *Grain-Based Desserts in the Child and Adult Care Food Program* (<https://www.fns.usda.gov/cacfp/grain-based-desserts-child-and-adult-care-food-program>) to exclude sweet crackers from being designated as grain-based desserts. Under the revised Exhibit A, the following foods are considered grain-based desserts: cookies, sweet pie crusts, doughnuts, cereal bars, breakfast bars, granola bars, sweet rolls, toaster pastries, cake, and brownies. As a best practice, FNS encourages centers and day care homes to serve sweet crackers on a limited basis because of their higher added sugar content.

FNS recognizes that centers and day care homes may want to occasionally serve grain-based desserts, such as for celebrations or other special occasions. As a reminder, centers and day care homes continue to have the flexibility to serve grain-based desserts as an additional food item that does not contribute to the meal components required for reimbursement.

### **Breakfast Cereals**

Breakfast cereals served to infants, children, and adults must contain no more than 6 grams of sugar per dry ounce (21.2 grams of sugar per 100 grams of dry cereal) (7 CFR 226.20(a)(4)(ii)). Breakfast cereals include ready-to-eat cereals and instant and hot cereals. As a reminder, only iron-fortified infant cereals and ready-to-eat cereals are reimbursable in the infant meal pattern. All breakfast cereals are reimbursable for the child and adult meal patterns. Breakfast cereals

must meet the sugar limit and be whole grain-rich, enriched, or fortified to be creditable in the CACFP.

There are several ways for centers and day care homes to determine if a breakfast cereal is within the sugar limit. Centers and day care homes may use any one of the following methods to determine if a breakfast cereal meets the sugar limit:

1. Use any State agency's Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) approved breakfast cereal list. Similar to CACFP, all WIC-approved breakfast cereals must contain no more than 6 grams of sugar per dry ounce (21.2 grams of sugar per 100 grams).
2. Use USDA's Team Nutrition training worksheet "Choose Breakfast Cereals That Are Low in Added Sugar" (<https://www.fns.usda.gov/tn/cacfp-meal-pattern-training-tools>). The worksheet includes a chart with common breakfast cereal serving sizes and the maximum amount of sugar the breakfast cereal may contain per serving.
3. Use the Nutrition Facts label on the breakfast cereal packaging to calculate the sugar content per dry ounce.
  - First, find the serving size in grams at the top of the Label and the sugars listed towards the middle.
  - Next, divide the total sugars by the serving size in grams.
  - If the answer is equal to or less than 0.212, then the cereal is within the required sugar limit and may be creditable in CACFP.

Question 5 under "III. BREAKFAST CEREALS" in Attachment 2, provides an example of this calculation.

4. Use an FNS-provided alternate calculation that uses rounding and aligns with the Team Nutrition training worksheet noted above:
  - First, find the serving size in grams at the top of the Nutrition Facts label.
  - Multiply the serving size in grams by 0.212.
  - If the answer in step 2 ends in 0.5 or more, round the number up to the next whole number. If the answer in step 2 ends in 0.49 or less, round the number down to the next whole number. For example, if the answer in step 2 is 4.24, it is rounded down to 4.
  - Next, find the Sugars listed towards the middle of the Nutrition Facts label.

- Compare the number from Step 4 with the number in Step 3. If the number from Step 4 is equal to, or less than, the number in Step 3, the cereal meets the sugar limit and may be creditable in the CACFP.

As long as a breakfast cereal meets the sugar limit using at least one of the methods described above, it is considered within the sugar limit.

## II. COMPLIANCE

As currently required, centers and day care homes must demonstrate they are serving meals that meet the meal pattern requirements, including the grain requirements outlined in this memorandum. State agencies have the authority to determine what constitutes acceptable record keeping documentation to demonstrate compliance. To the extent possible, State agencies should not impose additional paperwork requirements to demonstrate compliance with the updated grain requirements. Instead, State agencies should maintain current recordkeeping requirements or update existing forms to avoid any additional burden while still demonstrating compliance with the meal pattern requirements.

Demonstrating compliance with the whole grain-rich requirement can be accomplished in a number of ways. As an example, centers and day care homes can indicate on the menu which grain items are whole grain-rich. This could be as simple as writing “whole wheat” or “WW” in front of “bread” so that the menu item reads “whole wheat bread” or “WW bread”, writing “whole grain-rich” in front of a food item, such as “whole grain-rich English muffins”, or having a check box signifying the food is whole grain-rich. It is the State agency’s and sponsor’s responsibility, as applicable, to verify the grains served are creditable and the whole grain-rich items being served meet the whole grain-rich criteria presented in this memorandum when conducting on-site reviews. This may include reviewing the grain products’ labels and other product information.

FNS understands that implementation of the updated CACFP meal patterns is a significant change for some centers and day care homes. In recognition of that, FNS established a transition period for the updated CACFP meal patterns for Fiscal Year 2018 (October 1, 2017 through September 30, 2018). Please see CACFP 13-2017, *Transition Period for the Updated Child and Adult Care Food Program Meal Patterns and the Updated National School Lunch and School Breakfast Programs’ Infant and Preschool Meal Patterns* (<https://www.fns.usda.gov/transition-period-updated-cacfp-infant-preschool-meal-patterns>). During the transition period, if a State agency or sponsoring organization observes a meal pattern violation related to the updated meal patterns, such as not serving a whole grain-rich grain, they must provide technical assistance in lieu of fiscal action.

Regional Directors

State Directors

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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**

Angela Kline

Director

Policy and Program Development Division

Child Nutrition Programs

Attachments

**EXHIBIT A: GRAIN REQUIREMENTS FOR CHILD NUTRITION PROGRAMS<sup>1,2</sup>**

Color Key: Footnote 5 = Blue, Footnote 3 or 4 = Red

Group A	Ounce Equivalent (Oz Eq) for Group A	Minimum Serving Size for Group A
<ul style="list-style-type: none"> <li>• Bread type coating</li> <li>• Bread sticks (hard)</li> <li>• Chow Mein noodles</li> <li>• Savory Crackers (saltines and snack crackers)</li> <li>• Croutons</li> <li>• Pretzels (hard)</li> <li>• Stuffing (dry) Note: weights apply to bread in stuffing.</li> </ul>	<p>1 oz eq = 22 gm or 0.8 oz                      3/4 oz eq = 17 gm or 0.6 oz                      1/2 oz eq = 11 gm or 0.4 oz                      1/4 oz eq = 6 gm or 0.2 oz</p>	<p>1 serving = 20 gm or 0.7 oz                      3/4 serving = 15 gm or 0.5 oz                      1/2 serving = 10 gm or 0.4 oz                      1/4 serving = 5 gm or 0.2 oz</p>
Group B	Oz Eq for Group B	Minimum Serving Size for Group B
<ul style="list-style-type: none"> <li>• Bagels</li> <li>• Batter type coating</li> <li>• Biscuits</li> <li>• Breads - all (for example sliced, French, Italian)</li> <li>• Buns (hamburger and hot dog)</li> <li>• Sweet Crackers<sup>5</sup> (graham crackers - all shapes, animal crackers)</li> <li>• Egg roll skins</li> <li>• English muffins</li> <li>• Pita bread</li> <li>• Pizza crust</li> <li>• Pretzels (soft)</li> <li>• Rolls</li> <li>• Tortillas</li> <li>• Tortilla chips</li> <li>• Taco shells</li> </ul>	<p>1 oz eq = 28 gm or 1.0 oz                      3/4 oz eq = 21 gm or 0.75 oz                      1/2 oz eq = 14 gm or 0.5 oz                      1/4 oz eq = 7 gm or 0.25 oz</p>	<p>1 serving = 25 gm or 0.9 oz                      3/4 serving = 19 gm or 0.7 oz                      1/2 serving = 13 gm or 0.5 oz                      1/4 serving = 6 gm or 0.2 oz</p>

<sup>1</sup> In NSLP and SBP (grades K-12), all grains served must meet whole grain-rich criteria. For information on flexibilities, please contact your State agency. For all other Child Nutrition Programs, grains are whole grain or enriched or made with enriched or whole-grain meal and/or flour, bran, and/or germ. Under CACFP child and adult meal patterns, and in NSLP/SBP preschool meals, at least one grain serving per day must meet whole grain-rich criteria.

<sup>2</sup> For NSLP and SBP (grades K-12), grain quantities are determined using ounce equivalents (oz eq). All other Child Nutrition Programs determine grain quantities using grains/bread servings. Beginning Oct. 1, 2019, grain quantities in CACFP and NSLP/SBP infant and preschool meals will be determined using oz eq. Some of the following grains may contain more sugar, salt, and/or fat than others. This should be a consideration when deciding how often to serve them.

<sup>5</sup> Allowed in NSLP (up to 2.0 oz eq grain-based dessert per week in grades K-12) as specified in §210.10. May count towards the grain component in SBP (grades K-12), CACFP, NSLP/SBP infant and preschool meals, and SFSP.

Attachment 1

<b>Group C</b>	<b>Oz Eq for Group C</b>	<b>Minimum Serving Size for Group C</b>
<ul style="list-style-type: none"> <li>• Cookies<sup>3</sup> (plain - includes vanilla wafers)</li> <li>• Cornbread</li> <li>• Corn muffins</li> <li>• Croissants</li> <li>• Pancakes</li> <li>• Pie crust (dessert pies<sup>3</sup>, cobbler<sup>3</sup>, fruit turnovers<sup>4</sup>, and meat/meat alternate pies)</li> <li>• Waffles</li> </ul>	1 oz eq = 34 gm or 1.2 oz 3/4 oz eq = 26 gm or 0.9 oz 1/2 oz eq = 17 gm or 0.6 oz 1/4 oz eq = 9 gm or 0.3 oz	1 serving = 31 gm or 1.1 oz 3/4 serving = 23 gm or 0.8 oz 1/2 serving = 16 gm or 0.6 oz 1/4 serving = 8 gm or 0.3 oz
<b>Group D</b>	<b>Oz Eq for Group D</b>	<b>Minimum Serving Size for Group D</b>
<ul style="list-style-type: none"> <li>• Doughnuts<sup>4</sup> (cake and yeast raised, unfrosted)</li> <li>• Cereal bars, breakfast bars, granola bars<sup>4</sup> (plain)</li> <li>• Muffins (all, except corn)</li> <li>• Sweet roll<sup>4</sup> (unfrosted)</li> <li>• Toaster pastry<sup>4</sup> (unfrosted)</li> </ul>	1 oz eq = 55 gm or 2.0 oz 3/4 oz eq = 42 gm or 1.5 oz 1/2 oz eq = 28 gm or 1.0 oz 1/4 oz eq = 14 gm or 0.5 oz	1 serving = 50 gm or 1.8 oz 3/4 serving = 38 gm or 1.3 oz 1/2 serving = 25 gm or 0.9 oz 1/4 serving = 13 gm or 0.5 oz
<b>Group E</b>	<b>Oz Eq for Group E</b>	<b>Minimum Serving Size for Group E</b>
<ul style="list-style-type: none"> <li>• Cereal bars, breakfast bars, granola bars<sup>4</sup> (with nuts, dried fruit, and/or chocolate pieces)</li> <li>• Cookies<sup>3</sup> (with nuts, raisins, chocolate pieces and/or fruit purees)</li> <li>• Doughnuts<sup>4</sup> (cake and yeast raised, frosted or glazed)</li> <li>• French toast</li> <li>• Sweet rolls<sup>4</sup> (frosted)</li> <li>• Toaster pastry<sup>4</sup> (frosted)</li> </ul>	1 oz eq = 69 gm or 2.4 oz 3/4 oz eq = 52 gm or 1.8 oz 1/2 oz eq = 35 gm or 1.2 oz 1/4 oz eq = 18 gm or 0.6 oz	1 serving = 63 gm or 2.2 oz 3/4 serving = 47 gm or 1.7 oz 1/2 serving = 31 gm or 1.1 oz 1/4 serving = 16 gm or 0.6 oz
<b>Group F</b>	<b>Oz Eq for Group F</b>	<b>Minimum Serving Size for Group F</b>
<ul style="list-style-type: none"> <li>• Cake<sup>3</sup> (plain, unfrosted)</li> <li>• Coffee cake<sup>4</sup></li> </ul>	1 oz eq = 82 gm or 2.9 oz 3/4 oz eq = 62 gm or 2.2 oz 1/2 oz eq = 41 gm or 1.5 oz 1/4 oz eq = 21 gm or 0.7 oz	1 serving = 75 gm or 2.7 oz 3/4 serving = 56 gm or 2 oz 1/2 serving = 38 gm or 1.3 oz 1/4 serving = 19 gm or 0.7 oz

<sup>3</sup> Allowed in NSLP (up to 2.0 oz eq grain-based dessert per week in grades K-12) as specified in §210.10 and at snack service in SFSP. Considered a grain-based dessert and cannot count towards the grain component in CACFP or NSLP/SBP infant and preschool meals beginning October 1, 2017, as specified in §§226.20(a)(4) and 210.10.

<sup>4</sup> Allowable in NSLP (up to 2.0 oz eq grain-based dessert per week for grades K-12) as specified in §210.10. May count towards the grain component in SBP (grades K-12) and at snack and breakfast meals in SFSP. Considered a grain-based dessert and cannot count towards the grain component in the CACFP and NSLP/SBP infant and preschool meals beginning October 1, 2017, as specified in §§226.20(a)(4) and 210.10.

Attachment 1

<b>Group G</b>	<b>Oz Eq for Group G</b>	<b>Minimum Serving Size for Group G</b>
<ul style="list-style-type: none"> <li>• Brownies<sup>3</sup> (plain)</li> <li>• Cake<sup>3</sup> (all varieties, frosted)</li> </ul>	1 oz eq = 125 gm or 4.4 oz 3/4 oz eq = 94 gm or 3.3 oz 1/2 oz eq = 63 gm or 2.2 oz 1/4 oz eq = 32 gm or 1.1 oz	1 serving = 115 gm or 4 oz 3/4 serving = 86 gm or 3 oz 1/2 serving = 58 gm or 2 oz 1/4 serving = 29 gm or 1 oz
<b>Group H</b>	<b>Oz Eq for Group H</b>	<b>Minimum Serving Size for Group H</b>
<ul style="list-style-type: none"> <li>• Cereal Grains (barley, quinoa, etc.)</li> <li>• Breakfast cereals (cooked)<sup>6,7</sup></li> <li>• Bulgur or cracked wheat</li> <li>• Macaroni (all shapes)</li> <li>• Noodles (all varieties)</li> <li>• Pasta (all shapes)</li> <li>• Ravioli (noodle only)</li> <li>• Rice</li> </ul>	1 oz eq = 1/2 cup cooked or 1 ounce (28 gm) dry	1 serving = 1/2 cup cooked or 25 gm dry
<b>Group I</b>	<b>Oz Eq for Group I</b>	<b>Minimum Serving Size for Group I</b>
<ul style="list-style-type: none"> <li>• Ready to eat breakfast cereal (cold, dry)<sup>6,7</sup></li> </ul>	1 oz eq = 1 cup or 1 ounce for flakes and rounds 1 oz eq = 1.25 cups or 1 ounce for puffed cereal 1 oz eq = 1/4 cup or 1 ounce for granola	1 serving = 3/4 cup or 1 oz, whichever is less

<sup>3</sup> Allowed in NSLP (up to 2.0 oz eq grain-based dessert per week in grades K-12) as specified in §210.10 and at snack service in SFSP. Considered a grain-based dessert and cannot count towards the grain component in CACFP or NSLP/SBP infant and preschool meals beginning October 1, 2017, as specified in §§226.20(a)(4) and 210.10.

<sup>6</sup> Refer to program regulations for the appropriate serving size for supplements served to children aged 1 through 5 in the NSLP; breakfast served in the SBP, and meals served to children ages 1 through 5 and adult participants in the CACFP. Breakfast cereals are traditionally served as a breakfast menu item but may be served in meals other than breakfast.

<sup>7</sup> In the NSLP and SBP, cereals must list a whole grain as the first ingredient and be fortified, or if the cereal is 100 percent whole grain, fortification is not required. For CACFP and SFSP, cereals must be whole-grain, enriched, or fortified; cereals served in CACFP and NSLP/SBP infant and preschool meals must contain no more than 6 grams of sugar per dry ounce.

## **QUESTIONS AND ANSWERS**

New or updated questions are preceded by three asterisks (\*\*\*)

Questions related to grains found in CACFP 08-2017, *Questions and Answers on the Updated Meal Pattern Requirements for the Child and Adult Care Food Program*

(<https://www.fns.usda.gov/cacfp/questions-and-answers-updated-meal-pattern-requirements-child-and-adult-care-food-program>) now appear here.

### **I. WHOLE GRAIN-RICH**

#### **1. \*\*\*How will centers and day care homes identify whole grain-rich foods?**

Centers and day care homes can identify whole grain-rich foods using one of several methods. First, if a food is labeled “whole wheat” then the product meets the whole grain-rich criteria. Second, if a whole grain is listed as the first ingredient (or second after water) on the product’s ingredient list and the next two grain ingredients are creditable (whole or enriched grain, bran, or germ), then the product meets the whole grain-rich criteria. Third, centers and day care homes can look for one of the following FDA approved whole-grain health claims on its packaging: “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” or “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.”

Additionally, a center or day care home can work with a manufacturer to get the proper documentation demonstrating that whole grains are the primary grain ingredient by weight. For foods prepared by a CACFP center or day care home, a standardized recipe can be used to determine that whole grains are the primary grain ingredient by weight, and the rest are creditable (enriched grain, bran, or germ).

In recognizing that whole grain-rich products are not always easy to identify, FNS is developing training worksheets in English and Spanish to help CACFP centers and day care homes identify whole grain-rich foods. Additionally, USDA’s Team Nutrition developed the *Nutrition and Wellness Tips for Young Children: Provider Handbook for the Child and Adult Care Food Program* that includes tips on how to include more 100 percent whole-grain foods on menus ([http://www.fns.usda.gov/sites/default/files/whole\\_grains.pdf](http://www.fns.usda.gov/sites/default/files/whole_grains.pdf)).

#### **2. \*\*\*Are bran and germ creditable grains in the CACFP?**

Yes. Bran and germ are credited the same as enriched or whole-grain meal or flour in the CACFP.

#### **3. \*\*\*Why did FNS develop the *rule of three*?**

FNS developed the *rule of three* to simplify the process of identifying creditable grains

for CACFP center and day care home operators in recognition that the CACFP operates differently than the School Meal Programs and because the CACFP meal patterns were designed to be cost neutral. FNS understands that reading ingredient lists for grain foods and products can be difficult. It is challenging to determine the predominant weight of a grain product and how much non-creditable grains are in the product by only looking at the ingredient list. FNS encourages centers and day care homes to use their discretion when using the *rule of three* and consider the nutritional value of the entire product before serving it. If a grain product passes the *rule of three* test, centers and day care homes may want to also consider the amount of added sugars, saturated fats, and sodium in the product to ensure it contributes to a healthy eating pattern and the wellness of CACFP participants.

4. **\*\*\*If an English muffin’s ingredient list says: “whole wheat flour, water, enriched wheat flour, wheat starch, yeast, sugar, salt,” does it pass the *rule of three* and meet the whole grain-rich criteria?**

No. The third grain ingredient is wheat starch; wheat starch is not a creditable grain. The *rule of three* requires the first three grain ingredients be creditable. Creditable grains are whole or enriched grains, bran, or germ. Wheat starch is not a whole grain or an enriched grain.

5. **\*\*\*If a loaf of bread’s ingredient statement reads: “enriched flour, water, honey, whole wheat flour, wheat gluten, yeast, sugar, whole grain corn, salt”, does it pass the *rule of three* test and is it creditable in the CACFP?**

Yes. The loaf of bread passes the *rule of three* test and is creditable in the CACFP as an enriched grain. The first three ingredients are creditable: the first ingredient is an enriched flour (an enriched grain), the second grain ingredient is whole wheat flour (a whole grain), and the third grain ingredient is whole grain corn (a whole grain). The loaf of bread does not meet the whole grain-rich criteria because the first ingredient (or second after water), is not a whole grain.

6. **\*\*\*How does the *rule of three* apply to mixed dishes?**

The *rule of three* may also be used for the grain portion of mixed dishes, such as pizza crusts and tortillas for burritos. If the first grain ingredient is whole grain and the next two grain ingredients (if any) are whole grain or enriched, then the product meets the whole grain-rich criteria. For example, a cheese pizza’s ingredient list may say: “mozzarella cheese, parmesan cheese, white whole wheat flour, brown rice flour, enriched flour, non-fat milk, water, tomato paste, yeast.” In this example, the first and second grain ingredients are whole grains. The third grain ingredient is enriched. This cheese pizza crust passes the *rule of three* test and it meets the whole grain-rich criteria because whole grain is listed as the primary ingredient out of the first three grain ingredients listed.

7. **Do non-creditable grains that appear in the meat portion of a mixed product need to be considered when using the *rule of three*?**

No. Non-creditable grains that appear in the meat portion of a mixed product are considered an insignificant amount and do not need to be considered in the *rule of three*. For example, if the meat portion of a breaded beef patty (not the batter or the breading) is made with wheat flour, the amount of wheat flour in the beef patty is considered an insignificant amount. Additionally, non-creditable ingredients that appear as a sub-listing of a secondary ingredient (such as in a seasoning blend or a thickening agent) are typically negligible and are considered an insignificant amount. For example, in the following ingredient list for a chili dish, the flour is sub-listed as part of the secondary ingredient, the seasoning: ground turkey, kidney beans, onions and spices {chili powder, cayenne pepper, oregano, paprika, garlic, onion, and flour}. The flour is considered an insignificant amount.

**8. \*\*\* Are the FDA whole grain health claims sufficient documentation to demonstrate that a food is whole grain-rich?**

Yes. The FDA whole grain health claims outlined on page 3 of this memorandum demonstrates that the primary grain ingredient is whole grain. Therefore, they are considered sufficient documentation to demonstrate a grain meets the whole grain-rich criteria in the CACFP. As a best practice, if there are any remaining grains, (i.e., the food is not 100 percent whole grain), centers and day care homes should review the ingredient list to ensure the next two grain ingredients are whole or enriched grains, bran or germ (the *rule of three*).

FNS is allowing the FDA whole grain health claims to be sufficient documentation to demonstrate compliance with the whole grain-rich criteria in the CACFP, only. The FDA whole grain health claims are not sufficient documentation to demonstrate a grain is whole grain-rich in the School Meal Programs.

**9. \*\*\*Can centers and day care homes use the Whole Grain Stamps from the Whole Grain Council to determine if a grain product meets the whole grain-rich criteria?**

No. While the Whole Grain Stamps provide useful information on the amount of whole grains a product contains, they are not sufficient documentation to determine if a food is whole grain-rich. Products that display a Whole Grain Stamp may also contain high amounts of non-creditable grains, such as non-enriched refined flour. Therefore, the Whole Grain Stamps from the Whole Grain Council alone are not sufficient documentation to demonstrate a product is whole grain-rich. Centers and day care homes must still review the ingredient list to determine that whole grains are the primary grain ingredient and there are insignificant amounts of non-creditable grains. The *rule of three* is an easy way to accomplish this.

**10. \*\*\*Do grain products have to be 100 percent whole grain to meet the whole grain-rich requirement?**

No. Grain products do not need to be 100 percent whole grain to meet the whole grain-

rich criteria. However, grain products that contain 100 percent whole grains do meet the whole grain-rich criteria. Whole grain-rich foods contain at least 50 percent whole grains and the remaining grains, if any, must be creditable (enriched grain, bran, and germ). To assist centers and day care homes in implementation, FNS established the *rule of three*. Please see page 4 of the body of this memorandum for detailed information about the *rule of three*.

For child and adult meals and snacks, centers and day care homes must serve at least one whole grain-rich food per day. Requiring that at least one grain served per day be whole grain-rich, instead of 100 percent whole grain, gives centers and day care homes flexibility in choosing what grains they serve while still offering the nutritional benefits of whole grains. This flexibility will make it easier for centers and day care homes to find grain products that meet the updated meal pattern requirements.

**11. \*\*\*Are fully cooked grain products, such as pasta, whose ingredient list has water as the first ingredient and a whole grain as the second ingredient, considered whole grain-rich?**

Yes. A grain product is considered whole grain-rich if water is listed as the first ingredient and a whole grain is listed as the second ingredient on the ingredient list and the next two grain ingredients (if any) are whole or enriched grain, bran or germ.

**12. \*\*\*Can wheat bread, rolls, and buns labeled as “100% whole wheat” be used to meet the whole grain-rich requirement?**

Yes. Grain products that are specifically labeled as “whole wheat bread”, “entire wheat bread”, “whole wheat rolls”, “entire wheat rolls”, “whole wheat buns”, and “entire wheat buns” are 100 percent whole wheat and are easily identifiable as meeting the whole grain-rich criteria. These products generally will not have any refined grains listed in the ingredient statement. If they do, it is considered to be an insignificant amount. Please note that foods with the label “whole grain”, “made with whole grains”, “made with whole wheat”, or “contains whole grains” do not necessarily meet the whole grain-rich criteria.

**13. In a recipe for bread, would ingredients listed as 2 cups of whole-wheat flour and 2 cups of enriched, white flour meet the whole grain-rich requirement?**

Yes. A food that contains 2 cups of whole-wheat flour and 2 cups of enriched, white flour would meet the whole grain-rich requirement. This is because it contains 50 percent whole grains and the remaining grains in the food are enriched.

**14. \*\*\*If a day care home prepares whole grain pancakes from scratch, do they have to have a recipe?**

Yes. Similar to other foods made from scratch, centers and day care homes must have a standardized recipe in order to demonstrate that the pancakes meet the whole grain-rich

criteria (if the pancakes are designated as the one whole grain-rich item of the day) or the enriched grain criteria. The standardized recipe is also necessary to show that the yield and serving sizes are adequate.

**15. Do centers and day care homes have the discretion to choose which meals will include a whole grain-rich grain?**

Yes. Centers and day care homes may choose to serve a whole grain-rich item at any meal or snack as long as one grain per day over the course of all the meals and snacks served that day is whole grain-rich. For example, a center may serve a whole grain-rich cereal at breakfast one day and a whole grain-rich pasta at lunch the next day. This will help expose participants to a variety of whole grains and the wide range of vitamins and minerals whole grains provide.

**16. If a different group of children are at lunch than at breakfast, do both meals have to contain a whole grain-rich grain?**

No. The whole grain-rich requirement applies to the center or day care home, not to each child or adult participant. If a center or day care home serves breakfast and lunch and two different groups of children or adults are at each meal, only one meal must contain a whole grain-rich food.

FNS strongly encourages centers and day care homes that have different groups of participants at each meal (such as one group of children at breakfast and a second group at lunch) to vary the meal in which a whole grain-rich item is served. For example, whole grain-rich toast could be served at breakfast on Monday and brown rice could be served at lunch on Tuesday. This will help ensure that all participants are served a variety of whole grains and benefit from the important nutrients they provide.

**15. If a center or day care home only serves one meal per day, does the grain have to be whole grain-rich every day?**

Yes. If a center or day care home only serves one meal per day (breakfast, lunch, or supper), then the grain served at that meal must be whole grain-rich to meet the whole grain-rich requirement. When a meat/meat alternate is served in place of the grains component at breakfast (allowed a maximum of three times per week), and the center or day care home only serves that one meal per day, a whole grain-rich item does not need to be served.

Centers or day care homes that only serve a snack, such as an at-risk afterschool program, are not required to serve a grain at snack because it is not a required component at snack. However, in that situation, if a grain is served, it must be whole grain-rich.

**16. If an at-risk afterschool center only serves supper and chooses to use offer versus serve (OVS), do all of the grains offered have to be whole grain-rich?**

Yes. If an at-risk afterschool center or adult day care center only serves one meal per day and chooses to use OVS, all the grain items offered must be whole grain-rich. While OVS allows a variety of food items from one component to be served, a center that only serves one meal per day cannot offer one whole grain-rich grain and one enriched grain. This ensures greater consumption of whole grains if a child or adult chooses to take a grain item.

**17. If a program only serves snacks, would all the grains served at snack have to be whole grain-rich?**

Yes. If the snack includes a grain, such as crackers with apples, the grain must be whole grain-rich. However, programs that only serve snack, such as an at-risk afterschool program, are not required to serve a grain at snack because it is not a required component at snack. A program may offer a reimbursable snack with a fruit and vegetable, milk and fruit, a meat alternate and vegetable, and so forth. Conversely, if a center or day care home only serves one meal (breakfast, lunch or supper) per day then the grain served at that meal must be whole grain-rich.

**II. GRAIN-BASED DESSERTS**

**1. Why are grain-based desserts no longer allowed to contribute to the grain component of a meal?**

The Dietary Guidelines for Americans (Dietary Guidelines) identify grain-based desserts as sources of added sugars and saturated fats. It recommends Americans reduce their consumption of added sugars and saturated fats. The Richard B. Russell National School Lunch Act requires the CACFP meal patterns to be consistent with the Dietary Guidelines. Therefore, in order to be more consistent with the Dietary Guidelines, grain-based desserts cannot count towards the grain components in CACFP under the updated meal pattern requirements. This will help reduce the amount of added sugars and saturated fats that children and adults consume.

**2. \*\*\*Are there any criteria for identifying grain-based desserts?**

In Exhibit A of this memorandum, foods are designated as grain-based desserts with a superscript 3 or 4. These foods cannot be part of a reimbursable meal in the CACFP. There is not a specific amount of sugar, fat, or any other nutrient that qualifies a grain as a dessert. Establishing nutrient standards would increase complexity and burden on centers and day care homes because it would require evaluation of each grain item served against these nutrient standards. The following items are designated as grain-based desserts: cookies, sweet pie crusts, doughnuts, cereal bars, breakfast bars, granola bars, sweet rolls, toaster pastries, cake, and brownies.

It is important to note that cookies do not have a standard of identity, so a food manufacturer may come up with fanciful names that could mislead the menu planner into serving a product that may not be allowed. When determining whether a food is a grain-based dessert, the menu planner should consider whether the food is commonly

thought of as a dessert or treat. Menu planners should also be aware that even if a product is not labeled as a traditional dessert item, it may contain higher levels of added sugars or saturated fats. Menu planners should use their discretion when serving these foods.

**3. \*\*\*Are homemade granola bars or other homemade grain-based desserts allowed?**

No. Homemade and commercially prepared grain-based desserts cannot count towards the grain component in CACFP starting October 1, 2017. Based on stakeholder feedback, FNS decided using categories to define grain-based desserts was the best approach versus establishing nutrient standards or preparation requirements.

**4. Are quick breads, such as banana bread and zucchini bread, still allowed?**

Yes. Quick breads are credited in the same group as muffins under Group D in Exhibit A (Attachment A), and both may continue to be part of a reimbursable meal.

**5. Are scones and grain puddings considered grain-based desserts?**

Sweet scones, sweet bread puddings, and rice puddings are considered grain-based desserts and cannot count towards the grain component. Savory scones, such as one made with cheese and herbs, credit like a biscuit and are not considered grain-based desserts. However, sweet scones, such as those made with fruit and icing, credit like a cookie and are considered grain-based desserts.

Bread puddings can also be savory or sweet. Sweet bread puddings, such as one made with chocolate chips, is considered a grain-based dessert. However, savory bread puddings, such as one made with spinach and mushrooms, are not considered grain-based desserts.

Menu planners should consider the common perception of the food item and whether it is thought of as a dessert when deciding to serve it. Using this approach is particularly important when a food item is not labeled as a dessert. If a menu planner is unsure of whether a food item is considered a grain-based dessert, he or she should work with his or her sponsor or State agency, as appropriate, to make the decision.

**6. Are black bean brownies allowed at snack?**

Brownies are considered grain-based desserts and cannot credit towards the grains component in any meal. In addition, the black beans in a brownie cannot count towards the meat/meat alternate component. This is because they are not easily recognizable as a meat/meat alternate and each portion is not likely to have a sufficient amount of meat/meat alternate (¼ ounce equivalency) to contribute to the meat/meat alternate component.

**7. \*\*\*Are crusts on savory pies, such as chicken pot pie, allowed?**

Yes. Crusts on meat/meat alternate (savory) pies, such as a chicken pot pie, may credit towards the grain component if it contains at least ¼ serving grain per portion. For more information on how crusts on savory pies credit, please see the *Food Buying Guide for Child Nutrition Programs* available at <http://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs> and the web-based interactive *Food Buying Guide* at <https://foodbuyingguide.fns.usda.gov/>.

**8. Can centers and day care homes serve cake or another grain-based dessert for special celebrations, such as a birthday?**

Centers and day care homes may choose to serve grain-based desserts, such as cakes or cookies, during celebrations or other special occasions as an additional food item that is not reimbursable. FNS recognizes that there may be times when a center or day care home would like to serve foods or beverages that are not reimbursable. FNS encourages centers and day care homes to use their discretion when serving non-reimbursable foods and beverages, which may be higher in added sugar, saturated fats, and sodium, to ensure children and adult participants' nutritional needs are met.

**9. If a center or day care home chooses to serve a grain-based dessert with fruit, can the fruit count towards the fruit requirement?**

Yes. The fruit in the grain-based dessert can credit towards the fruit component. The grains portion of a grain-based dessert with fruit, such as pies, cobblers, or crisps, cannot count towards the grain component. Centers and day care homes should serve sweetened fruit in moderation to help reduce children and adults' consumption of added sugars and help children develop a taste preference for unsweetened fruit.

**10. May non-profit food service account funds be used to purchase grain-based desserts?**

No. CACFP centers or day care homes may not use Program funds to purchase non-creditable foods. Grain-based desserts are not creditable in the CACFP under the updated meal pattern requirements. One exception to this policy is condiments, herbs, and spices. While condiments, herbs, and spices cannot credit towards the meal pattern requirements, condiments served with creditable foods and herbs and spices used to prepare and enhance the flavor of meals may be purchased with non-profit food service account funds.

**11. Pancakes and waffles are not grain-based desserts according to Exhibit A. If syrup, honey, jam or another sweet topping is served with the pancakes or waffles, are they then considered grain-based desserts?**

No. Adding a sweet topping, such as syrup, to pancakes or waffles does not make them grain-based desserts and they can continue to be counted towards the grain component. However, FNS strongly encourages centers and day care homes to explore healthier alternatives for toppings, such as fruit or yogurt. Minimizing sweet toppings will help reduce children's and adults' consumption of added sugars. When sugars are added to foods and beverages to sweeten them, they add calories without contributing essential

nutrients.

### **III. BREAKFAST CEREALS**

#### **1. What is the difference between breakfast cereal and ready-to-eat cereal?**

Breakfast cereal is a broad term defined by the Food and Drug Administration as including ready-to-eat, instant, and regular hot cereals, such as oatmeal (21 CFR 170.3(n)(4)). Ready-to-eat cereals, or boxed cereals, are a type of breakfast cereal that can be eaten as sold and is typically fortified with vitamins and minerals. Some examples of ready-to-eat cereals are puffed rice cereals, whole grain o's, and granola. While a ready-to-eat cereal is always a breakfast cereal, a breakfast cereal is not always a ready-to-eat cereal.

FNS uses the terms "breakfast cereals" and "ready-to-eat cereals" in guidance because of this distinction. For example, only ready-to-eat cereals are allowed at snack under the infant meal pattern, but all breakfast cereals served in the CACFP must be whole grain-rich, enriched, or fortified and contain no more than 6 grams of sugar per dry ounce.

#### **2. \*\*\*How do centers and day care homes know if a ready-to-eat breakfast cereal is "fortified"?**

Cereal products that have been fortified are labeled as such and have an ingredient statement similar to the following (for EXAMPLE purposes only): "Ingredients: Whole wheat, sugar, oats, contains 2% or less of salt, baking soda, caramel color, annatto color, BHT for freshness. Vitamins and Minerals: Vitamin C (sodium ascorbate, ascorbic acid), niacinamide, vitamin B6 (pyridoxine hydrochloride), reduced iron, zinc oxide, folic acid, vitamin B2 (riboflavin), vitamin B1 (thiamin hydrochloride), vitamin A palmitate, vitamin D, vitamin B12."

#### **3. Can a provider mix a high sugar cereal with a low sugar cereal to meet the sugar limit?**

No. Generally, it is acceptable to mix creditable food items together to create another creditable food item, such as fruit and yogurt blended together to make a smoothie. However, providers may not mix a non-creditable food item with a creditable food item to make the new food item creditable. For example, a provider cannot mix a cereal with 8 grams of sugar per dry ounce with a cereal with 4 grams of sugar per dry ounce to create a cereal that has 6 grams of sugar per dry ounce (the sugar limit for breakfast cereals). Another example that is not allowed is mixing yogurts to create a yogurt that has no more than 23 grams of sugar per 6 ounces.

Logistically, it would be challenging for monitors to determine that the mixed cereal or yogurt meets its respective sugar limit during a review. Additionally, it would be difficult for providers to calculate the sugar content of mixed cereals and yogurt.

**4. \*\*\*Can sugar be added on top of oatmeal or another breakfast cereal that meets the sugar limit?**

Breakfast cereals, as purchased, must contain no more than 6 grams of sugar per dry ounce. Similarly, if a center or day care home makes a breakfast cereal from scratch, such as granola, it must contain no more than 6 grams of sugar per dry ounce. Centers and day care homes may choose to add toppings to breakfast cereals to increase their appeal. FNS strongly encourages centers and day care homes to offer healthy toppings for breakfast cereals, such as fruit instead of brown sugar. Minimizing sweet toppings will help reduce children's and adults' consumption of added sugars. When sugars are added to foods and beverages to sweeten them, they add calories without contributing essential nutrients.

**5. \*\*\*How does a center or day care home determine if a breakfast cereal has no more than 6 grams of sugar per dry ounce (21.2 grams of sugar per 100 grams of dry cereal)?**

As a reminder breakfast cereals must meet the sugar limit and be whole grain-rich, enriched, or fortified to be creditable in CACFP. There are several ways a center or day care home can determine if a breakfast cereal is within the sugar limit. First, centers and day care homes can use any State agency's Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) approved breakfast cereal list. Some stores also have labels on the shelves indicating which breakfast cereals are WIC-approved. All WIC-approved breakfast cereals contain no more than 6 grams of sugar per dry ounce (21.2 grams of sugar per 100 grams of dry cereal).

Second, FNS developed an easy-to-use chart to further help centers and day care homes identify breakfast cereals within the sugar limit. The chart is available on the second page of USDA's Team Nutrition training worksheet "Choose Breakfast Cereals That Are Low in Added Sugar" (<https://www.fns.usda.gov/tn/cacfp-meal-pattern-training-tools>).

Lastly, centers and day care homes may do some math to determine the sugar content of a breakfast cereal. Using the Nutrition Facts label, the center or day care home may divide the amount of sugar per serving (listed towards the middle) by the serving size in grams (listed at the top). If the amount of sugar per serving divided by the serving size in grams is 0.212 or less, then the cereal is within the sugar limit and may be creditable in CACFP. For example, Cereal A's Nutrition Facts Labels shows that the serving size is 55 grams and the amount of sugar per serving is 13 grams. Therefore, 13 grams (sugar) divided by 55 grams (serving size) equals 0.236. Cereal A exceeds the sugar limit because 0.236 is greater than 0.212.

**6. \*\*\*There are times when a breakfast cereal is within the sugar limit when using the chart in the "Choosing Breakfast Cereals That Are Lower in Added Sugars" worksheet, but is not within the sugar limit when using the calculation in this memorandum. Which one is correct?**

Both the chart and the calculation are valid ways of demonstrating a breakfast cereal meets the sugar limit (no more than 6 grams of sugar per dry ounce, or 21.2 grams of sugar per 100 grams of dry cereal).

The discrepancy between the chart and calculation comes from rounding. To develop the chart, FNS used the standard rules for rounding: round up to the next whole number if the number after the decimal point is 0.5 or greater, and round down if the number is less than 0.5. This results in some breakfast cereals meeting the sugar limit when using the chart, but not the calculation. The Food and Drug Administration uses the same rounding rules for the Nutrition Facts label

(<https://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm064932.htm>). Therefore, some leniency is necessary.

FNS developed an alternate calculation that uses rounding and aligns with the chart that centers and day care homes may use:

- First, find the serving size in grams at the top of the Nutrition Facts label.
- Multiply the serving size in grams by 0.212.
- If the answer in step 2 ends in 0.5 or more, round the number up to the next whole number. If the answer in step 2 ends in 0.49 or less, round the number down to the next whole number. For example, if the answer in step 2 is 4.24, it is rounded down to 4.
- Next, find the Sugars listed towards the middle of the Nutrition Facts label.
- Compare the number from Step 4 with the number in Step 3. If the number from Step 4 is equal to, or less than, the number in Step 3, the cereal meets the sugar limit and may be creditable in the CACFP.

A breakfast cereal that falls within the sugar limit using the chart or either of the calculations may be creditable. As a reminder, breakfast cereals must meet the sugar limit and be whole grain-rich, enriched, or fortified to be creditable in the CACFP.

**7. If a center or day care home makes homemade granola, how can they determine if it meets the sugar limit for breakfast cereals?**

When making homemade granola, centers and day care homes must calculate the sugar content of the granola based on the recipe they use. The provider should keep the standardized recipe on file to demonstrate the granola meets the breakfast cereal sugar limit if asked during a review.

#### **IV. COMPLIANCE**

**1. \*\*\*When submitting menus for review, do centers and day care homes need to document which grains are whole grain-rich?**

It is at the State agency's discretion to determine what is acceptable documentation to demonstrate compliance with the whole grain-rich requirement. Identifying which grains are whole grain-rich on the menus is a good best practice and is strongly recommended by FNS.

Identifying whole grain-rich foods on a menu may be done by using terms or abbreviations such as "whole grain-rich", "WGR", "whole wheat", or simply listing a whole grain. For example, a menu may say: "peanut butter and jelly sandwich on whole grain-rich bread", "whole wheat pasta and chicken", or "brown rice and vegetables". Another option could be to use a check box to identify which grain is whole grain-rich on the menu. Common and usual names for whole grains that are helpful to know and can be used to identify whole grain-rich foods on menus are:

- The word "whole" listed before a grain, such as "whole wheat" or "whole corn";
- The words "berries" and "groats" are used to designate a whole grain, such as "wheat berries" or "oat groats";
- Rolled oats and oatmeal (including old fashioned, steel cut, quick cooking, and instant oatmeal); and
- Other whole-grain foods that do not use the word "whole" in their description, such as brown rice, brown rice flour, wild rice, quinoa, millet, triticale, teff, amaranth, buckwheat, and sorghum.

When conducting on-site reviews, it is the State agency's or sponsor's responsibility, as applicable, to verify the grains served are creditable, including the whole grain-rich items served meet the whole grain-rich criteria presented in this memorandum

**2. \*\*\*If a day care home serves breakfast and snack, and a grain is served at both breakfast and snack, but neither of the grains are whole grain-rich, which meal is disallowed?**

The snack would be disallowed. This is because the snack is the meal with the lowest reimbursement rate that contained a grain. Conversely, if a grain was not served at snack and the grain at breakfast is not whole grain-rich, then the breakfast meal would be disallowed. In that situation, the breakfast meal is the meal with the lowest reimbursement rate that contained a grain.

Please note, though, that FNS provided a transition period for the updated CACFP meal patterns for Fiscal Year 2018 (October 1, 2017 through September 30, 2018). Please see CACFP 13-2017, *Transition Period for the Updated Child and Adult Care Food Program Meal Patterns and the Updated National School Lunch and School Breakfast Programs' Infant and Preschool Meal Patterns*

(<https://www.fns.usda.gov/transition-period-updated-cacfp-infant-preschool-meal-patterns>). During the transition period, if a State agency or sponsoring organization observes a meal pattern violation related to the updated requirements, such as not serving a whole grain-rich grain, they must provide technical assistance in lieu of fiscal action.

3. **\*\*\*If a center serves breakfast and lunch and the whole grain-rich grain is planned for lunch, but the center is forced to close before serving lunch due to severe weather, will meals be disallowed?**

No. If a center or day care home is unable to serve the meal with a whole grain-rich grain due to extenuating circumstances, no meals will be disallowed on the basis that the whole grain-rich requirement was not met.

4. **\*\*\* When reviewing food labels to determine if a grain is creditable, how much non-creditable grain is acceptable?**

Centers and day care homes should purchase and serve grains with an insignificant amount of non-creditable grains. Centers and day care homes can be confident that a food contains an insignificant amount of non-creditable grains when they are listed after a “contains 2% or less” statement on the ingredient list. For example, an ingredient list may state “contains less than 2% of wheat flour and corn starch”.

To determine if a grain is creditable, centers and day care homes should use the *rule of three* described on page 4 of the body of this memorandum. State agencies have the discretion to determine what is acceptable documentation to demonstrate that a grain contains an insignificant amount of non-creditable grains. FNS encourages State agencies to continue to use the methods they currently have in place to determine if grains are creditable.

5. **\*\*\*If a grain says “dough conditioner” in the ingredient list, is the grain still creditable?**

Yes. If the grain item contains a “dough conditioner” and the sub-listing of the “dough conditioner” includes a non-creditable grain in the ingredient statement, the item may still be creditable. For example, a loaf of bread may list a dough conditioner in the ingredient statement in the following manner: “dough conditioners [wheat flour, salt, soy oil, ascorbic acid].” Non-creditable grains found in the dough conditioner sub-listing are considered insignificant; therefore the grain item is creditable.