



Grain Requirements in the CACFP; Questions and Answers

Purpose

This memorandum explains the grain requirements for the Child and Adult Care Food Program (CACFP) established in the final rule, "Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010." This revision further clarifies how to determine if a grain product meets the whole grain-rich criteria. It also includes updated Questions and Answers in Attachment 3.

This memorandum supersedes:

- USDA policy memorandum, CACFP 01-2018, *Grain Requirements in the Child and Adult Care Food Program; Questions and Answers* (October 19, 2017)
- DECAL policy memorandum, *Grain Requirements in the Child and Adult Care Food Program; Questions and Answers* (November 3, 2017).

This memorandum has been revised as result of CACFP specific regulation changes pertaining to the final rule, *2024 Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans* ("2024 Final Rule"). Revisions made by GA DECAL are indicated with an (*).

Legal Authority

USDA Policy Memorandum CACFP 09-2018

Definition

***Whole grain-rich** is the term designated by Food and Nutrition Services (FNS) to indicate that the grain content of a product is between 50 and 100 percent whole grain with any remaining grains being enriched.

Background

This memorandum provides 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, the agency recognizes that CACFP operates differently than the National School Lunch Program (NSLP) and School Breakfast Program (SBP). Therefore, there are some instances when the CACFP guidance is different from the School Meal Programs. For more information on the preschool meal pattern requirements for NSLP and SBP, see SP 01 -2018, *Updated Infant and Preschool Meal Patterns in the National School Lunch Program and School Breakfast Program; Questions and Answers* (<https://www.fns.usda.gov/nslp/updated-infant-and-preschool-meal-patterns-national-school-lunch-program-and-school-breakfast>).

The final rule 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 *2015-2020 Dietary Guidelines for Americans (Dietary Guidelines)*, which provide grain recommendations in oz eq. In recognizing that this requires a significant operational change for centers and day care homes, *FNS delayed the implementation of oz eq until October 1, 2021. FNS issued additional guidance on crediting oz eq on October 23, 2019.

Program Requirements

Grain is a required component at breakfast, lunch, and supper meals, and is an optional component at snack. 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 in order to be creditable.

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)). Any additional grains served that **do not meet the whole grain-rich criteria described below** may still be creditable if they are made of the required grains. State agencies and Program operators are encouraged to continue using the methods they previously had in place to determine if a grain item was creditable. The *Food Buying Guide for Child Nutrition Programs* (the *Food Buying Guide*) (<https://foodbuyingguide.fns.usda.gov>) is a source of crediting information for CACFP. Appendix E lists the steps for identifying creditable grain products (<https://foodbuyingguide.fns.usda.gov/Appendix/ResourceAppendixE>). For easy reference, the Flowchart for Determining Creditable Grains/Breads from the *Food Buying Guide* is included as Attachment 1 of this memorandum.

Enriched Grains and Fortified Breakfast Cereals

Enriched grains are refined grains that have been processed to remove the nutrient-rich bran and germ, and then have thiamin, riboflavin, niacin, folic acid, and iron added after processing. Similarly, a food that is fortified has certain vitamins and minerals added to increase the nutritional quality. Foods made from refined grains that meet at least **one** of the following are considered creditable:

1. The food is labeled as "enriched." For example, long grain rice that is enriched will have the product name "enriched long grain rice."
2. An enriched grain is listed as the first ingredient on the food's ingredient list or second after water. The ingredient list will usually say "enriched flour" or "enriched wheat flour," or there is a sub-listing of nutrients used to enrich the flour, for example, "yellow corn flour {iron, folic acid, riboflavin, niacin, and thiamine}."
3. For breakfast cereals, the product is labeled as "fortified" or the ingredient list names the

vitamins and minerals that have been added to the product. If a breakfast cereal is fortified, it does not need to be enriched. For example, the ingredient list of a fortified breakfast cereal may read, "Ingredients: Wheat flour, sugar, contains 2% or less of salt, baking soda, caramel color, BHT for freshness. Vitamins and Minerals: Vitamin C (sodium ascorbate, ascorbic acid), niacin, vitamin B6 (pyridoxine hydrochloride), reduced iron, zinc oxide, folic acid, vitamin B2 (riboflavin), vitamin B1 (thiamin hydrochloride), vitamin A palmitate, vitamin D, vitamin B12."

NOTE: The ingredient list of a non-fortified cereal would not name any added vitamins and minerals. For example, the ingredient list of a non-fortified breakfast cereal may read, "Ingredients: rice flour, corn flour, evaporated cane juice, pomegranate juice concentrate, sea salt." This particular cereal would not be considered a creditable grain because it is not made from whole or enriched grains and is not fortified.

Whole Grain-Rich

A whole grain is a grain that has not had its nutrient-rich germ and bran removed, and therefore does not need enrichment. Foods that meet the whole grain-rich criteria are foods that contain at least 50 percent whole grains and the remaining grains in the food are enriched, or are 100 percent whole grain. At least one serving of grains per day must be whole grain-rich. This whole grain-rich requirement only applies to meals served to children and adults; it does not apply to infant meals.

Any **one** of the following six options may be used to determine if a grain product meets the whole grain-rich criteria. Use of these methods is intended to be flexible so that individual operators, who may use different methods to purchase food (such as wholesale or retail), can easily identify creditable whole grain-rich foods. The operator must only ensure that a food meets at least **one** of the following to be considered whole grain-rich:

1. The product is found on any State agency's Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)-approved whole grain food list.

Any grain product found on a State agency's WIC-approved whole grain food list meets CACFP whole grain-rich criteria. Providers can obtain a copy of a State agency's WIC-approved whole grain food list by contacting the WIC State agency. For a list of WIC State agency contacts, please see www.fns.usda.gov/wic/wic-contacts.

2. The product is labeled as "whole wheat" and has a Standard of Identity issued by the U.S. Food and Drug Administration (FDA).

An FDA Standard of Identity is a set of rules for what a certain product (like whole wheat bread) must contain or may contain to legally be labeled with that product name. FDA provides Standards of Identity for certain whole wheat bread products (21 CFR 136.180) and certain whole wheat pasta products (21 CFR 139.138).

Only breads with these exact product names conform to an FDA Standard of Identity and can be considered whole grain-rich using this method:

- whole wheat bread
- entire wheat brand

- graham bread
- whole wheat rolls
- entire wheat rolls
- graham rolls
- whole wheat buns
- entire wheat buns
- graham buns

Only pastas with these exact product names conform to an FDA Standard of Identity and can be considered whole grain-rich using this method:

- whole wheat macaroni product
- whole wheat macaroni
- whole wheat spaghetti
- whole wheat vermicelli

Other grain products labeled as "whole wheat" that do **not** have an FDA Standard of Identity, such as crackers, tortillas, bagels, and biscuits, must be evaluated for whole grain-rich creditability for CACFP using one of the other methods on this list.

Please be aware that manufacturers may label their products with terms that are similar to, but slightly different from, FDA Standard of Identity terms defined above. Some frequently encountered terms include "whole grain," "made with whole grains," "made with whole wheat," or "contains whole grains." These terms do **not** indicate an FDA Standard of Identity for whole wheat products. Foods labeled with these terms must be evaluated for whole grain-rich creditability for CACFP using one of the other methods on this list.

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

"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. The food meets the whole grain-rich criteria under the NSLP.

Use of the NSLP whole grain-rich criteria may ease menu planning and purchasing for schools that operate CACFP at-risk afterschool programs or CACFP child care programs, as they can use the same whole grain-rich criteria for both programs. The NSLP whole grain-rich criteria apply for all grain products with the exception of grain-based desserts, which are not creditable under CACFP.

5. The food meets FNS' *Rule of Three*, a three-step process for identifying whole grain-rich products in the CACFP.

FNS developed the *Rule of Three* in recognition that CACFP operators purchase food differently than School Meal Program operators, as CACFP operators often shop in retail environments and may not have access to manufacturers' product formulation statements or products specially formulated for School Meal Programs.

To meet the *Rule of Three* as a whole grain-rich product, the first ingredient (or second after water) must be whole grain, and the next two **grain** ingredients (if any) must be whole grains, enriched grains, bran, or germ. Any grain derivatives (by-products of grains) may be disregarded. Any non-creditable grain ingredients (e.g., flours that are not enriched or whole) that are labeled as 2 percent or less of product weight are considered insignificant and may also be disregarded (see below for a list of these ingredients).

When applying the *Rule of Three* to the grain portion of mixed dishes, such as pizza crusts and tortillas for burritos, the first **grain** ingredient must be whole grain and the next two **grain** ingredients (if any) must be whole grains, enriched grains, bran, or germ.

When applying the *Rule of Three* for ready-to-eat breakfast cereals, if the first grain ingredient is a whole grain and the cereal is fortified, the product meets the whole grain-rich criteria. In this situation, the second and third grain ingredients, if any, do not need to be considered.

Buyers may wish to refer to this list of ingredients while reviewing grain product labels when using the *Rule of Three*. Please note that this list is not meant to be exhaustive, and there may be other items that qualify that are not listed below.

Whole Grains (must be the first grain ingredient; may be the second or third grain ingredient)

- Wheat berries
- Wheat groats
- Oat groats
- Whole grain corn
- Brown rice
- Wild rice
- Buckwheat groats
- Rye groats
- Whole einkorn berries

- Spelt berries
- Millet
- Triticale
- Quinoa
- Teff
- Buckwheat
- Amaranth
- Sorghum
- Bulgur
- Cracked wheat
- Whole wheat flour
- Whole durum flour
- Graham flour
- Whole grain corn flour
- Whole rye flour
- Whole grain oat flour
- Whole grain einkorn flour
- Whole grain spelt flour
- Buckwheat flour
- Millet Flour
- Teff flour
- Triticale flour
- Amaranth flour
- Sorghum flour
- Whole grain wheat flakes
- Old fashioned oats
- Steel cut oats
- Quick cooking oats
- Instant oatmeal
- Sprouted whole wheat
- Sprouted brown rice
- Sprouted whole rye
- Sprouted buckwheat
- Sprouted einkorn

- Sprouted spelt
- Whole corn

Brans and Germs (may be the second or third grain ingredient)

- Wheat bran
- Oat bran
- Corn bran
- Rice bran
- Rye bran
- Wheat germ

Enriched Grains (may be the second or third grain ingredient)

- Enriched wheat flour
- Enriched white flour
- Enriched durum flour
- Enriched rye flour
- Enriched rice flour
- Enriched corn flour
- Enriched bromated flour
- Enriched durum wheat flour
- Enriched rice

Disregarded ingredients (may be ignored, as these ingredients are **not** included in the *Rule of Three*)

- Any ingredients that are less than 2 percent of product weight (any ingredients listed on the ingredient list after the words "contains 2% or less").
- Any grain derivatives which are generally presented in only small amounts, such as;
 - wheat gluten
 - wheat starch
 - wheat dextrin
 - corn starch
 - corn dextrin
 - rice starch
 - tapioca starch
 - modified food starch

Non-creditable Grains or Flours (The following ingredients are not whole or enriched and **cannot** be one of the first 3 grain ingredients)

- Bromated flour
- Wheat flour
- White flour
- Durum flour
- Oat fiber
- Corn fiber
- Malted barley flour
- Barley malt
- Corn
- Yellow corn meal
- Yellow corn flour
- Degerminated corn meal
- Semolina
- Farina
- Rice flour
- Potato flour
- Any bean flour
- Any nut flour

Examples of *Rule of Three*:

Example 1: An English muffin's ingredient list says: "whole wheat flour, water, enriched wheat flour, wheat starch, yeast, sugar, and salt." This product is creditable as a whole grain-rich product in the CACFP using the Rule of Three because the first ingredient (whole wheat flour) is a whole grain, and the second grain ingredient (enriched wheat flour) is an enriched grain. The wheat starch is a grain derivative and therefore does not count as a grain ingredient in CACFP. Therefore, this product meets the Rule of Three based on the only two grain ingredients.

Example 2: A corn chip's ingredient list reads: "**whole corn**, vegetable oil, salt, cheddar cheese, maltodextrin, **wheat flour**, Romano cheese, whey protein concentrate." This product is not creditable as a whole grain-rich product for CACFP using the *Rule of Three*, because although the first ingredient is a whole grain (whole corn), the next grain ingredient is unenriched wheat flour. However, this item is creditable as a grain that is not being served as a whole grain-rich item because the first grain is a whole grain (See Attachment 1).

Example 3: A cheese pizza's ingredient list reads: "mozzarella cheese, parmesan cheese, **white**

whole wheat flour, brown rice flour, enriched flour, non-fat milk, water, tomato paste, yeast." This product meets the whole grain-rich criteria using the *Rule of Three* because the first and second **grain** ingredients are whole grains and the third **grain** ingredient is enriched.

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

Documentation from a manufacturer or a standardized recipe is particularly helpful when determining whole grain-rich creditability for grain products that do not have a whole grain as the first ingredient and for mixed products. When a grain product (such as bread) has a first ingredient that is not whole grain, the primary ingredient by weight may still 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 grain ingredients. When the grain portion of a mixed product (like a beef enchilada) is not entirely whole grain, it may be whole grain-rich depending upon the proportion of whole grains to other grain ingredients.

Examples of Proper Documentation:

Example 1: Documentation from a manufacturer of a purchased bagel states the product contains 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.

Example 2: A standardized recipe for homemade bread calls for 2 cups of whole-wheat flour and 2 cups of enriched flour. This recipe meets the whole grain-rich requirement, because it contains 50 percent whole grains and the remaining grains in the food are enriched.

Example 3: The retail package for a frozen breaded chicken patty is labeled "contains whole grains" and lists grain ingredients as "enriched wheat flour, whole wheat flour, and whole grain corn flour." The buyer understands that "contains whole grains" does not indicate an FDA Standard of Identity and the product does **not** meet the *Rule of Three* for determining whole grain-rich creditability because the first grain ingredient is **not** a whole grain. The buyer contacts the manufacturer and receives documentation that the grain portion of the product contains 50 percent enriched wheat flour, 25 percent whole wheat flour, and 25 percent whole grain corn flour. This product is therefore creditable as whole grain-rich using manufacturer documentation showing that the grain portion contains 50 percent whole grain and the remaining grains are enriched.

As 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.

Child Nutrition Labels

Some CACFP providers may already be using products with a Child Nutrition Label that lists grains in oz eq. *Although FNS did not implement oz eq requirements for CACFP until October 1, 2021, providers could have used the oz eq information on a CN Labeled product to meet the whole grain-rich requirement for CACFP. An oz eq of whole grain is slightly more than the prior serving size requirement for CACFP,

therefore the oz eq of whole grain meets the minimum quantity for the CACFP grain component. Please refer to the CN Labeling Program website for more information at <https://www.fns.usda.gov/cn/labeling>.

Grain-Based Desserts

The *Dietary Guidelines* recommend limiting consumption of added sugars and saturated fats as part of a healthy eating pattern and *The Richard B. Russell National School Lunch Act* requires the CACFP meal patterns to be consistent with the *Dietary Guidelines*. The *Dietary Guidelines* specifically identify 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)) under the updated CACFP meal pattern requirements.

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. 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.

Therefore, grain-based desserts are those items that have a superscript 3 or 4 in Exhibit A (Attachment 2) of this memorandum. Under 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.

It is important to note that cookies do not have an FDA 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. State agencies and sponsoring organizations can provide guidance when a menu planner is unsure whether a product could be considered a grain-based dessert.

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. However, non-creditable food items are **not** allowable costs and must be purchased using non-program funds.

Breakfast Cereals

*Through September 30, 2025 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). *By October 1, 2025, breakfast cereals must contain no more than 6 grams of added sugars per dry ounce (7 CFR 226.20(a)(4)(ii)). Breakfast cereals include ready-to-eat cereals and instant and hot cereals. As a reminder, both infant cereals and ready-to-eat cereals must be iron-fortified to be reimbursable in the infant meal pattern. Breakfast cereals must meet the sugar limit and be made from enriched or whole

grain meal or flour, or be 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. A breakfast cereal must meet only **one** (not all) of the following methods to determine if a breakfast cereal meets the sugar limit:

1. Use any State agency's 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). *By October 1, 2025, breakfast cereals must contain no more than 6 grams of added sugars per dry ounce. To support cross-program alignment, CACFP operators may use any State's WIC list to identify breakfast cereals and yogurts that may be offered in CACFP, as the WIC list's sugar content will align with CACFP's rule regarding added sugars.
2. Use USDA's Team Nutrition training worksheet *Choose Breakfast Cereals That Are Lower in Added Sugars* (<https://www.fns.usda.gov/tn/choose-breakfast-cereals-lower-sugar>), which includes a chart with common breakfast cereal serving sizes and the maximum amount of sugar the breakfast cereal may contain per serving, which should eliminate the need to perform sugar limit calculations for many operators.
3. Use one of the following methods to calculate the sugar content per dry ounce.

Standard Method

- First, find the serving size in grams at the top of the Nutrition Facts label, and find the sugars listed towards the middle.
- Next, divide the total sugars by the serving size in grams. *Beginning October 1, 2025, divide the added 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.

Example

Cereal A's Nutrition Facts label shows that the serving size is 55 grams and the amount of sugar per serving is 13 grams. Thirteen 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.

Rounding Method

This is the calculation method used in the Team Nutrition training worksheet *Choose Breakfast Cereals That Are Lower in Added Sugars* (<https://www.fns.usda.gov/tn/choose-breakfast-cereals-lower-sugar>) noted above. The worksheet uses the standard rules for rounding, which are to round up to the next whole number if the number after the decimal point is 0.5 or greater and to round down if the number is less than 0.5.

- 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. * Beginning October 1, 2025, find the added sugars 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.

Example

Cereal B's Nutrition Facts label shows that the serving size is 30 grams. 30 grams times 0.212 equals 6.36. This number ends in 0.36, which is less than 0.5, so 6.36 is rounded down to 6 grams. Six grams is the sugar limit for a serving size of 30 grams. The amount of sugar per serving in Cereal B is 5 grams. Five grams is less than the sugar limit of 6 grams calculated for this serving size, so this cereal is under the sugar limit and is creditable in the CACFP. *Beginning October 1, 2025, this comparison will be based upon added sugars, not total sugars.

Both of these methods of calculations are valid ways of demonstrating a breakfast cereal meets the sugar limit, but there may be times when a breakfast cereal is within the sugar limit when using one of these methods, but not the other. 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.

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 recordkeeping documentation to demonstrate compliance, including requesting product labels and ingredient lists. 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" or "WGR" 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 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 SP-30, 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.

Comments

For questions concerning this memorandum, please contact the Policy Administrator at (404) 651-8193.

Flowchart for Determining Creditable Grains/Breads

Please see the attached file.

Exhibit A: Grain Requirements for Child Nutrition Programs^{1, 2}

Please see the attached file.

Questions and Answers

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

New or updated information by GA DECAL due to the 2024 Final Rule is preceded by one asterisk (*).

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>) now appear here.

I. WHOLE GRAIN-RICH

1. ***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. This is because products that display a Whole Grain Stamp may also contain high amounts of non-creditable grains, such as non-enriched, refined flour. Centers and day care homes may instead use any one of the six options presented in this memo for determining whether the product meets the whole grain-rich criteria.

2. ***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?

It depends. A fully cooked grain product with a whole grain as the second ingredient (after water) may or may **not** be whole grain-rich. The purchaser will need to evaluate

the product using any of the six options for determining if the product meets the whole grain-rich criteria. The purchaser can: 1) look for an FDA whole grain health claim, 2) check to see if the product is part of the WIC food package, 3) use the *Rule of Three* (which requires considering any additional ingredients), 4) look for an FDA whole wheat Standard of Identity (as for pasta), 5) request whole grain information from the manufacturer, or 6) consider if the product meets the NSLP whole grain-rich criteria.

3. 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.

4. 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.

5. ***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.

6. ***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.

7. 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.

II. GRAIN-BASED DESSERTS

1. ***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. Granola bars are denoted with a superscript 4 in Exhibit A (as shown in Attachment 2), so they qualify as a grain-based dessert. Based on stakeholder feedback, FNS decided using categories to define grain-based desserts was the best approach versus establishing nutrient standards or preparation requirements.

2. ***Are quick breads still allowed?

Yes. Quick breads are breads that are leavened (risen) with ingredients like baking powder and baking soda, instead of yeast. Some examples of quick breads are banana bread, pumpkin bread, and zucchini bread. Quick breads are credited in the same group as muffins under Group D in Exhibit A (Attachment 2) and continue to be part of a reimbursable meal.

3. Are scones and grain puddings considered grain-based desserts?

Sweet scones, sweet bread puddings, and sweet 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, are more 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, are 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 or treat 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.

4. ***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 or vegetable component. This is because they are not easily recognizable as a meat/meat alternate or vegetable and each portion is not likely to have a sufficient amount of meat/meat alternate or vegetable to contribute to the meat/meat alternate or vegetable component.

5. 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 toward the grain component when they contain at least ½ serving of enriched or whole grain per portion. For more information on how crusts on savory pies credit, please see

Attachment 2 of this document and the *Food Buying Guide* at <https://foodbuyingguide.fhs.usda.gov/>.

6. 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.

7. 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. All breakfast cereals, which include ready-to-eat cereals, must be made with enriched or whole grain meal or flour, or be fortified, and contain no more than 6 grams of sugar per dry ounce to be served in the CACFP.

2. 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. *By October 1, 2025, yogurt must contain no more than 12 grams of added sugars per 6 ounces. *By October 1, 2025, breakfast cereals must contain no more than 6 grams of added sugars per dry ounce.

3. 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 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. *By October 1, 2025, breakfast cereals must contain no more than 6 grams of added sugars per dry ounce.

4. 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. *By October 1, 2025, breakfast cereals

must contain no more than 6 grams of added sugars per dry ounce.

COMPLIANCE

5. If a day care home serves breakfast and snack, and a grain is served at both breakfast and snack, but neither of the grains is 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 has provided a transition period for the updated CACFP meal patterns for Fiscal Year 2018 (October 1, 2017 through September 30, 2018). Please see SP 30, 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.

6. 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.

7. ***If a grain product's ingredient list includes "dough conditioner," is the product still creditable?

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, such as wheat flour, found in the dough conditioner sub-listing are considered insignificant. Therefore, in this example, if the primary grain ingredient is made from whole or enriched flour or bran or germ, the grain item is creditable.

Attachments

1: Flowchart for Determining Creditable Grains/Breads

2: Exhibit A: Grain Requirements for Child Nutrition Programs1, 2