



Food and  
Nutrition  
Service

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DATE: October 14, 2016

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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). It also includes Questions and Answers in Attachment 2.

## Background

The Healthy, Hunger-Free Kids Act of 2010 (the Act), Public Law 111-296, amended section 17 of the Richard B. Russell National School Lunch Act (NSLA), 42 U.S.C. 1766(g), to require the U.S. Department of Agriculture (USDA) to update the CACFP meal pattern requirements to make them more consistent with (a) the most recent version of the Dietary Guidelines for Americans (Dietary Guidelines), (b) the most recent relevant nutrition science, and (c) appropriate authoritative scientific agency and organization recommendations. 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." The final rule amended the CACFP regulations at 226.20 to update the meal pattern requirements.

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. CACFP centers and day care homes must comply with these updated meal patterns, including these grain requirements, no later than October 1, 2017. For information on implementing the updated meal patterns prior to October 1, 2017, please refer to the memorandum SP 42-2016, CACFP 14-2016 "Early Implementation of the Updated Child and Adult Care Food Program Meal Pattern Requirements and the National School Lunch and School Breakfast Programs' Infant and Preschool Meal Patterns" ([http://www.fns.usda.gov/sites/default/files/cn/SP42\\_CACFP14\\_2016os.pdf](http://www.fns.usda.gov/sites/default/files/cn/SP42_CACFP14_2016os.pdf)).

The final rule also requires that grains be credited using ounce equivalents instead of "servings," as credited under the current meal pattern requirements. In recognizing that this requires a significant operational change for CACFP centers and day care homes, FNS

is delaying the implementation of ounce equivalents until October 1, 2019. FNS will issue additional guidance on ounce equivalents in the future.

## I. REQUIREMENTS

### Whole Grain-Rich

Starting October 1, 2017, at least one serving of grains per day must be whole grain-rich (7 CFR 226.20(a)(4)(i)(A)). Whole grain-rich foods 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.

Centers and day care homes can use the following as a simple checklist to determine if a grain is whole grain-rich. The food must meet at least one of the following:

Whole grains are the primary ingredient by weight:

1. Breads, cereals, and other non-mixed dishes: A whole grain is listed as the first ingredient on the product's ingredient list or second after water. Some examples of whole grain ingredients are whole wheat, brown rice or wild rice, oatmeal, bulgur, whole-grain corn, and quinoa.

When a whole grain is not listed as the first ingredient, the primary ingredient by weight may be whole grains 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, a bread may be made with three grain ingredients: enriched wheat flour (40% of grain weight), whole-wheat flour (30% of grain weight) and whole oats (30% of grain weight). This bread could meet the whole grain-rich criteria with proper documentation from the manufacturer or a recipe, for foods prepared by a CACFP center or day care home, because the combined weight of the two whole-grain ingredients (whole wheat and whole oats) is greater (60%) than the enriched wheat flour (40%), even though the enriched wheat flour may be listed first on the ingredient list. All grains in the food that are not whole grain must be enriched (e.g., enriched flour).

2. Pizza, burritos, and other mixed dishes: A whole grain is the first *grain* ingredient listed on the product's ingredient list, or multiple whole grains are the primary *grain* ingredient by weight. Proper documentation from the manufacturer or a recipe, for foods prepared by a CACFP center or day care home, is used as the basis for calculating whether the total weight of the whole-grain ingredients is higher than the total weight of the grain ingredients that are not whole grain. All grains in the food that are not whole grain must be enriched (e.g., enriched flour).

- ❑ 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 discourages the use of whole grain-rich foods that contain high amounts of starches (e.g., tapioca starch, modified food starch, potato starch, legume flours, etc.) in contributing toward the whole grain-rich requirement.

#### *Child Nutrition Labels*

Manufacturers may apply for a Child Nutrition (CN) Label for qualifying products to indicate the number of ounce equivalents 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 ounce equivalents in CACFP until October 1, 2019, grain products with a CN Label indicating the number of ounce equivalents 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 ounce equivalent is slightly heavier (16 grams of grains) than a serving size for CACFP (14.75 grams of grains). Therefore, the ounce equivalent meets the minimum quantity for the CACFP grain component. Please refer to the CN Labeling Program website for more information about qualifying products: [www.fns.usda.gov/cnd/cnlabeling/](http://www.fns.usda.gov/cnd/cnlabeling/).

#### **Grain-Based Desserts**

The Dietary Guidelines 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 under the updated CACFP meal patterns (7 CFR 226.20(a)(4)(iii)). CACFP centers and day care homes must comply with this new requirement no later than October 1, 2017. Grain-based desserts are those items that are denoted with a superscript 3 or 4 in Exhibit A (Attachment 1) of this memorandum. The following foods are considered grain-based desserts: cookies, sweet crackers (e.g. graham and animal crackers), sweet pie crusts, doughnuts, cereal bars, breakfast bars, granola bars, sweet rolls, toaster pastries, cake, and brownies.

The Exhibit A in this memorandum has been slightly revised from the Exhibit A that currently appears in the *Food Buying Guide for Child Nutrition Programs* (<http://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>) to be consistent

with the National School Lunch and School Breakfast Programs (School Meal Programs). The Food Buying Guide is being revised so there will be only one Food Buying Guide for all Child Nutrition Programs. The updated Food Buying Guide will include the Exhibit A in Attachment 1.

FNS recognizes that CACFP 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 is not reimbursable.

### **Breakfast Cereals**

Starting October 1, 2017, 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. This new requirement will help further reduce children and adult participants' intake of added sugars, as recommended by the Dietary Guidelines.

Centers and day care homes may 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). Alternatively, centers and day care homes may use the Nutrition Facts Label on the 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.

In Attachment 2, Question 5 under "Part II Grain-Based Desserts and Breakfast Cereals" provides an example of this calculation. FNS is developing additional resources to help CACFP centers and day care homes identify breakfast cereals within the sugar limit.

## **II. COMPLIANCE**

In order to ensure compliance with the whole grain-rich requirement outlined in 7 CFR 226.20(a)(4) and this memorandum, CACFP centers and day care homes must document on their menu when a grain is whole grain-rich. This could be as simple as writing "whole wheat" in front of "bread" so that the menu item reads "whole wheat bread." Writing "whole grain-rich" in front of a food item, such as "whole grain-rich English muffins," is also acceptable. It is the responsibility of the State agency or sponsor, as applicable, when conducting reviews, to check labels and product information to ensure that the whole grain-rich items being served meet the whole grain-rich criteria presented in this memorandum

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In the situation when a center or day care home serves grains but none of the grains served on that given day are whole grain-rich, then the meal with the lowest reimbursement rate where a grain was served would be disallowed. See Attachment 2, Questions and Answers for some examples.

State agencies are reminded to distribute this information to Program operators immediately. Program operators should direct any questions regarding this memorandum to the appropriate State agency. State agency contact information is available at <http://www.fns.usda.gov/cnd/Contacts/StateDirectory.htm>. State agencies should direct questions to the appropriate FNS Regional Office.

**Original Signed**

Angela Kline

Director

Policy and Program Development Division

Child Nutrition Programs

Attachments

## QUESTIONS AND ANSWERS

### **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 whole grain is listed as the first ingredient on the product's ingredient list or second after water, then the product meets the whole grain-rich criteria. Second, a center or day care home can work with a manufacturer to get the proper manufacturing documentation demonstrating that whole grains are the primary grain ingredient by weight. For foods prepared by a CACFP center or day care home, a recipe can be used to determine that whole grains are the primary grain ingredient by weight.

Additionally, 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."

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% 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)). Foods that contain 100% whole grains meet the whole grain-rich criteria.

#### **2. Can centers and day care homes use the Whole Grain Stamp (from the Whole Grain Council) to determine if a grain product meets the whole grain-rich criteria?**

No. While the Whole Grain Stamp provides useful information on the amount of whole grains a product contains, the product must still be evaluated against the whole grain-rich criteria outlined in this memorandum. Products that display the Whole Grain Stamp contain at least 8 grams of whole grain per serving. However, they may also contain some non-enriched refined flour which does not meet the grains criteria for Child Nutrition Programs. Therefore, just because a product has 8 grams of whole grains, does not mean the product meets the whole grain-rich criteria.

#### **3. Do grain products have to be 100% whole grain to meet the whole grain-rich requirement?**

No, grain products do not need to be 100% whole grain to meet the whole grain-rich criteria. However, grain products that contain 100% whole grain do meet the whole grain-rich criteria. Whole grain-rich foods contain at least 50% whole grains and the remaining grains, if any, must be enriched.

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% 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.

- 4. 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.

- 5. 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% whole wheat and are easily identifiable as meeting the whole grain-rich requirement. These products will not have any refined grains listed in the ingredient statement. Please note that foods with the label “whole grain” do not necessarily meet the whole grain-rich criteria.

- 6. 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, as long as there are no other grain ingredients in the food, 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 at least 50% whole grains and the remaining grains in the food are enriched.

- 7. 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.

## **II. GRAIN-BASED DESSERTS AND BREAKFAST CEREALS**

### **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 and recommends Americans reduce their consumption of added sugars and saturated fats. The Healthy, Hunger-Free Kids Act of 2010 required USDA to revise the CACFP meal patterns to better align them with the Dietary Guidelines. Therefore, in order to be more consistent with the Dietary Guidelines, grain-based desserts cannot be counted towards the grain components in CACFP starting October 1, 2017.

### **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 are not eligible for reimbursement in the CACFP. There is not a specific amount of sugar, fat, or any other nutrient that qualifies a grain product as a dessert. The following items are designated as grain-based desserts: cookies, sweet crackers (e.g. graham and animal crackers), sweet pie crusts, doughnuts, cereal bars, breakfast bars, granola bars, sweet rolls, toaster pastries, cake, and brownies.

It is important to note that crackers and 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. For example, a cookie may be called a “breakfast round.” The menu planner should use common perceptions of the product as a way to determine if the product is a grain-based dessert. 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 sugar, fat, and sodium. 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. There are no exceptions to allow a grain-based dessert to count towards the grain component, including the place of preparation or the preparation method.

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

Yes, quick breads are credited in the same group as muffins under Group D in Exhibit A, and both may continue to contribute towards the grain component.

### **5. 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.

**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.

**8. 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)?**

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).

Second, 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 (serving size) divided by 55 grams of sugar equals 0.236. Cereal A exceeds the sugar limit because 0.236 is greater than 0.212.

FNS is developing an easy-to-use chart to further help CACFP centers and day care homes identify breakfast cereals within the sugar limit.

### **III. COMPLIANCE**

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

Yes, starting October 1, 2017, centers and day care homes must document when a food is whole grain-rich on their menu and may do this by using terms such as "whole grain-rich," "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." 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, 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.

It is the responsibility of the State agency or sponsor, as applicable, when conducting reviews, to check labels and product information to ensure that the whole grain-rich items being 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.

- 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 and the menu demonstrates that a whole grain-rich grain was planned for the missed meal(s), no meals will be disallowed on the basis that the whole grain-rich requirement was not met. Menus must show that at least one whole grain-rich grain is offered each day the center or home is operating.

- 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 grain 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 whole grains and benefit from the important nutrients they provide.

- 5. 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 starting October 1, 2017. 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.