



# Oregon

Kate Brown, Governor



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**Colt Gill**

Acting Deputy Superintendent of Public Instruction

December 20, 2017

TO: Sponsors of the Child and Adult Care Food Program

RE: Grain Requirements in the Child and Adult Care Food Program; Questions and Answers  
CACFP 01-2018

The Oregon Department of Education Child Nutrition Programs (ODE CNP) received additional guidance from USDA on 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. It also includes an updated “Exhibit A: Grain Requirements for Child Nutrition Programs” in Attachment 1, updated Questions and Answers in Attachment 2 and an ODE CNP developed Grains Flowchart. 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 Meals or Flours

Whole grain meals or flours are made of the entire cereal grain seed or kernel. The kernel has three parts - the bran, the germ, and the endosperm. In refined grains, the bran and the germ are removed, leaving only the starchy endosperm. With whole grains, the bran and germ are left intact to provide fiber, B vitamins, and healthy fats. Some examples of whole grains include products with the word "whole" listed before a grain such as whole wheat or whole corn flour, cracked wheat, brown rice, oatmeal, wild rice, quinoa, and millet.

### 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.

### **Determining Creditable Grains**

Grain products that will not be used to meet the whole grain-rich requirements may continue to be credited using previous methods of crediting. Grain products labeled as ‘whole grain’ or ‘enriched’, or grain products with the first grain ingredient listed as enriched or whole grain will be creditable.

Appendix E in the [electronic Food Buying Guide](#) includes a flowchart for identifying creditable grain products. ODE CNP has developed a flowchart which incorporates Appendix E in order to help sponsors and providers identify creditable grains.

### **The Rule of Three**

When identifying creditable grain products or whole grain-rich products, centers and day care homes may use the *rule of three* as one of the determining methods: 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*.

## Determining Whole Grain-Rich Grains

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.

### **Grains Flowchart**

ODE CNP has developed flowcharts to assist sponsors and providers in identifying creditable grains and whole grain-rich grain products. The flowchart incorporates all four methods of crediting whole grain-rich products, including the *rule of three*. The flowcharts are attached to this memo.

### ***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

Please review the ODE CNP memos issued October 25, 2017 to Family Day Care Home sponsors and Center sponsors on menu documentation requirements on how to document the CACFP grain requirements. The memos are available on the ODE CNP public website at [Child Nutrition Programs Memos](#)

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 ODE CNP memo, [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](#) for more information on the transition period. 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.

If you have questions, please contact your assigned Child Nutrition Specialist.

Sincerely,



Lynne Reinoso,  
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Child Nutrition Programs  
Office of Student Services

Enclosures: Grain Requirements Q&A  
Grain Requirement Chart  
Flowchart for Determining Creditable and Whole Grain Rich