

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. ***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 ¼ 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.fns.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.

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.

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.

V. COMPLIANCE

- 1. 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.

- 2. 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.

- 3. ***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.