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January 2, 2025

### MEMORANDUM

**TO:** Child and Adult Care Food Program (CACFP) Sponsors

**FROM:** Aimee F. Beam, MS, RD *AFB*  
Director, Nutrition Programs

**RE:** **2025 Operational Memo # 5**  
**Grains Requirements in the Child and Adult Care Food Program: Questions and Answers**

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On December 19, 2024; the USDA Food and Nutrition (FNS) released policy guidance to support CACFP operations following the publication of the final rule, Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans (89 FR 31962).

This memorandum provides updated guidance reflecting the final rule, explains the grain requirements for the Child and Adult Care Food Program (CACFP), and includes questions and answers. This memorandum supersedes CACFP 09-2018, Grain Requirements in the Child and Adult Care Food Program; Questions and Answers, published April 4, 2018.

The memo is attached for your review. Please contact our office with any questions.

Attachment: CACFP 05-2025 – Grains Requirements in the Child and Adult Care Food Program: Questions and Answers

cc: Nutrition Team



## Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

**Date:** December 19, 2024

**Memo code:** CACFP 05-2025

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

**To:** Regional Directors, Child 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) and includes questions and answers. This memorandum supersedes CACFP 09-2018, *Grain Requirements in the Child and Adult Care Food Program; Questions and Answers*, published April 4, 2018.

### **Background**

On April 25, 2024, the USDA Food and Nutrition Service (FNS) published the final rule, “*Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans*” (89 FR 31962). The majority of the 2024 final rule focused on gradual updates to the school nutrition requirements, however the rule also included updates to the CACFP to better align Child Nutrition Program (CNP) requirements. The purpose of this memorandum is to provide updated guidance on the provisions of the 2024 final rule that apply to the grains requirements in the CACFP, which included adding a definition for whole grain-rich into CACFP regulations; changing product-based limits for breakfast cereals and yogurts from total sugars to added sugars; and updating guidance on substituting vegetables to meet the grains requirements for eligible Program operators. In addition to the information included in previous memoranda, this memorandum specifically:

1. Provides updated guidance on added sugars;
2. Provides updated guidance on substituting vegetables for grains in eligible settings;

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3. Adds two Q&As related to substituting vegetables for grains and using non-grain pasta products, respectively;
4. Adopts standardized terminology such as “institutions and facilities;” and
5. Reorganizes information throughout the memorandum for clarity.

Although FNS' goal is to streamline guidance and align CNPs to the greatest extent possible, the agency recognizes that CACFP operates differently than the National School Lunch Program (NSLP) and School Breakfast Program (SBP) and serves distinct populations. Therefore, there are some instances when CACFP guidance differs from school meal programs guidance. 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*, October 19, 2017, <https://www.fns.usda.gov/cn/updated-infant-and-preschool-meal-patterns-national-school-lunch-program-and-school-breakfast>.

### **Requirements**

Grains are a required component at breakfast, lunch, and supper meals in the CACFP. Grains are not required at snack (with the exception of the snack requirements for 6-11 month old infants) but may be served as one of the two meal components. At breakfast, CACFP institutions and facilities may serve meats/meat alternates in place of the entire grains component, up to three times per week. Creditable grains include whole grains, enriched grains, fortified ready-to-eat cereals, bran, and germ. The CACFP meal patterns require that at least one serving of grains per day must be whole grain-rich for children and adults (7 CFR 226.20(a)(4)(i)(A)). A whole grain-rich product has a grain content that is between 50 and 100 percent whole grain with any remaining grains being enriched (7 CFR 226.2). While there is no minimum whole grain-rich requirement for grains served to infants, CACFP institutions and facilities are encouraged to serve whole grain-rich grains to infants developmentally ready to accept them.

There are several ways that State agencies, institutions, and facilities may determine how grain items credit toward the meal pattern requirements. The grains component is measured in ounce equivalents (oz eq). One quarter (0.25) of an oz eq is the smallest creditable grain amount. If the minimum daily requirement for grains is 1.0 oz eq, for example, this minimum could be met by offering one food item or multiple food items, such as offering two separate 0.5 oz eq grain items. This 0.25 minimum creditable requirement does not apply to the CACFP infant meal pattern.

The ounce equivalents for grains may be determined by using the weights or volumes listed in the chart titled 'Exhibit A: Grain Requirements For Child Nutrition Programs,' part of the *Food Buying Guide for Child Nutrition Programs* (FBG), <https://www.fns.usda.gov/tn/fbg>. Institutions and facilities may also use the Grains section of the FBG, as well as Appendix A of the FBG; the latter features the Recipe Analysis Workbook (RAW), which is a tool used to determine the expected meal pattern contribution and crediting statement for a standardized recipe. Institutions and facilities may also use the Crediting Handbook for CACFP, <https://www.fns.usda.gov/tn/cacfp/crediting-handbook>, to determine ounce equivalents crediting. Additionally, institutions and facilities may use a Child Nutrition (CN) label or a manufacturer's Product Formulation Statement (PFS) to obtain information on how a product contributes toward meal pattern requirements.

### ***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 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 contains all parts of the grain kernel (bran, germ, and endosperm), and therefore does not need enrichment. For a grain product to be considered whole grain-rich, the grain content of a product must be between 50 and 100 percent whole grain with any remaining grains being enriched. For meals served to children and adult participants, at least one serving of grains per day must be whole grain-rich. Although whole grain-rich

grains may be served to infants, the daily whole grain-rich minimum 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 current Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)-approved whole grain food list.

Except for some cereals, whole grain bread and other whole grain options found on any State agency's WIC-approved food list meet the whole grain-rich criteria for all CNPs. This may include but is not limited to tortillas, pastas, rice, and breads on a State WIC list. Not all cereals on a WIC list are required to be whole grain-rich. When using the WIC list to choose a whole grain-rich cereal, the operator should be sure to choose one that is marked as whole grain on the WIC list. Program operators can obtain a copy of a State agency's WIC-approved food list by contacting WIC at the relevant State agency. WIC State agency contacts may be found at: <https://www.fns.usda.gov/wic/program-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 bread
- 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” for example. 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 FDA 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.

4. The product meets whole grain-rich criteria under NSLP.

Use of the NSLP whole grain-rich criteria may ease menu planning and purchasing for schools that operate CACFP, 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 product 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, particularly smaller sized CACFP operators who often shop in retail environments and may not have access to a manufacturers’ PFS’ or products specially formulated for school meal programs.

To meet the Rule of Three, 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. 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. The Rule of Three applies to the grain portion of mixed dishes, as well. See *Attachment 1: Rule of Three Supplementary Information* for more detail on implementing the Rule of Three.

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.



6. The product has proper documentation from a manufacturer or a standardized recipe demonstrating 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 dishes. When a grain product (such as bread) has a first grain 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 dish (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. See *Attachment 2: Whole Grain-Rich: Examples of Proper Documentation* for more information on implementing this option.

### ***Child Nutrition Labels and Product Formulation Statements***

Some commercially purchased food items containing a combination of meats and meat alternates and grains, such as pizza, burritos, corn dogs, and chicken nuggets, may not be listed in the Food Buying Guide; however, they still may be creditable with proper documentation, such as a CN label or a manufacturer's PFS. The CN Labeling Program is a voluntary Federal labeling program for CNPs. A CN label identifies the contribution of a product toward the meal pattern requirements. Main dishes that contribute at least 0.50 oz eq meats/meat alternates per serving are eligible for a CN label. If the product also contributes to the grains component, the CN label will indicate the ounce equivalent of grains provided. When grains on the CN label are expressed as "oz. equivalent grains," they credit as whole grain-rich. When grains on the CN label are expressed as "oz. equivalent grains (enriched)," they credit as enriched grains. When food items with a CN label are served according to directions, the label is sufficient documentation for monitoring purposes.

When a CN label is not available, institutions and facilities may request that the manufacturer provide a PFS to show how the creditable ingredients in the product contribute toward the meal pattern requirements. A manufacturer's PFS is a signed certified document that provides a way for a manufacturer to demonstrate how a product may contribute to the meal pattern requirements. Institutions and facilities are ultimately responsible for ensuring menu items meet meal pattern requirements; therefore, it is the program operator's responsibility to request and verify that the supporting documentation for the PFS is accurate. For more information on the CN label and a manufacturer's PFS, please refer to the Manufacturer Documentation information page, <https://www.fns.usda.gov/cn/manufacturer-documentation>.

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

Grain-based desserts cannot credit toward the grains requirement at any meal or snack in the CACFP (7 CFR 226.20(a)(4)(iii)). Grain-based desserts for CACFP are identified as items that have a superscript 3 or 4 in Exhibit A: Grain Requirements for CNPs, which is part of the *Food Buying Guide* (<https://foodbuyingguide.fns.usda.gov/Content/TablesFBG/Exhibit A Grain Requirements For Child Nutrition Programs.pdf>). Under Exhibit A, the following foods are considered grain-based desserts in CACFP: cookies, sweet pie crusts, cobblers, fruit turnovers, doughnuts, cereal bars, breakfast bars, granola bars, sweet rolls, toaster pastries, cake, coffee cake, and brownies. Other grain-based desserts in CACFP include, but are not limited to: sweet bread puddings, sweet biscotti, sweet croissants, sweet pita chips, sweet rice puddings, sweet scones, gingerbread, marshmallow cereal treats, and ice cream cones.

It is important to note that cookies do not have an FDA Standard of Identity, so a food manufacturer may use clever 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 high levels of added sugars. 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 institutions and facilities may want to occasionally serve grain-based desserts for celebrations or other special occasions. As a reminder, institutions and facilities 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***

The 2024 final rule updated CACFP **total sugars limits** for breakfast cereals and yogurt to **added sugars limits** that align with the NSLP/SBP product-based limits for breakfast cereals and yogurt.

Through September 30, 2025, breakfast cereals must contain no more than 6 grams of **total sugars** per dry ounce. By October 1, 2025, breakfast cereals served to infants, children, and adults must contain no more than 6 grams of **added sugars** per dry ounce (21.2 grams of added sugars per 100 grams of dry cereal) (7 CFR 226.20(a)(4)(ii)). However, with State agency approval, CACFP operators may choose to implement the added sugars limits for breakfast cereals (including ready-to-eat cereals for infants) early. Breakfast cereals include ready-to-eat cereals and instant and hot/cooked cereals (e.g., oatmeal). As a reminder, both infant cereals and ready-to-eat cereals must be iron-fortified to be reimbursable in the infant meal pattern. By October 1, 2025, breakfast cereals must meet the added sugars limit and must be made from enriched or whole grain meal or flour, or be fortified, to be creditable in the CACFP.

There are multiple ways for institutions and facilities to determine if a breakfast cereal is within the added sugars limit, including:

- Use any State agency's WIC approved breakfast cereal list. Consistent with CACFP, all WIC approved breakfast cereals must contain no more than 6 grams of added sugars per dry ounce (21.2 grams of added sugars per 100 grams).
- Use either the standard method or rounding method to calculate the added sugars amount per dry ounce.

### **Standard Method**

1. First, find the serving size in grams at the top of the Nutrition Facts label, and then find the added sugars amount listed toward the middle.
2. Next, divide the added sugars amount by the serving size in grams.
3. If the answer is equal to or less than 0.212, then the cereal is within the required added sugars 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 added sugars per serving is 13 grams. Dividing 13 grams (added sugars) by 55 grams (serving size) equals 0.236 ( $13/55 = 0.236$ ). Cereal A exceeds the added sugars limit because 0.236 is greater than 0.212.

### **Rounding Method**

1. First, find the serving size in grams at the top of the Nutrition Facts label.
2. Multiply the serving size in grams by 0.212.

3. 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; however, if the answer in step 2 is 4.59, it is rounded up to 5.
4. Next, find the added sugars amount listed toward the middle of the Nutrition Facts label.
5. 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 added sugars 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 added sugars limit for a serving size of 30 grams. The amount of added sugars per serving in Cereal B is 5 grams. Five grams is less than the added sugars limit of 6 grams calculated for this serving size, so this cereal is under the added sugars limit and is creditable in the CACFP.

Both of these calculation methods may be used to determine whether a breakfast cereal meets the added sugars limit; however, there may be times when a breakfast cereal is within the added sugars limit when using one of these methods, but not the other. As long as a breakfast cereal meets the added sugars limit using at least one of the methods described above, it is considered within the added sugars limit.

***Substituting Vegetables for Grains in American Samoa, Guam, Hawaii, Puerto Rico, the U.S. Virgin Islands, and Tribal Communities***

To support cultural food preferences of Program participants as well as address product availability and cost concerns in outlying areas, the 2024 final rule allows certain institutions and facilities to serve any vegetable to meet the grains requirement. Specifically, all institutions and facilities in American Samoa, Guam, Hawaii, Puerto Rico, and the U.S. Virgin Islands, as well as institutions or facilities that serve primarily American Indian or Alaska Native participants in any State may exercise this flexibility. The flexibility to substitute vegetables for the grains requirement extends to the infant meal pattern. Additional information, including documentation requirements, can be found in CACFP 03-2025, *Substituting Vegetables for Grains in American Samoa, Guam, Hawaii, Puerto Rico, the U.S. Virgin Islands, and Tribal Communities*, October 30, 2024, <https://www.fns.usda.gov/cn/substituting-vegetables-grains-hawaii-territories-tribal>.

**Compliance**

Institutions and facilities 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.

Demonstrating compliance with the whole grain-rich requirement can be accomplished in a number of ways. As an example, institutions and facilities 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 including a check box signifying the food is whole grain-rich. It is the State agency and sponsor’s responsibility, as applicable, to verify that the grains served are creditable and the whole grain-rich items being served meet the whole grain-rich criteria presented in this

memorandum. This may include reviewing grain products' labels and other product information.

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 agencies should direct questions to the appropriate FNS Regional Office.

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For J. Kevin Maskornick  
Director, Community Meals Policy Division  
Child Nutrition Programs

Attachments

## Attachment 1

**Rule of Three Supplementary Information**

Menu planners 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)

Amaranth	Rye groats	Whole dried corn
Amaranth flour	Spelt berries	Whole emmer (farro)
Brown rice	Sprouted brown rice	Whole durum flour
Buckwheat	Sprouted buckwheat	Whole grain corn flour
Buckwheat groats	Sprouted einkorn	Whole grain einkorn flour
Buckwheat flour	Sprouted spelt	Whole grain or nixtamalized corn
Bulgur	Sprouted whole rye	Whole grain oat flour
Cracked Wheat	Sprouted whole wheat	Whole grain sorghum flour
Graham flour	Steel cut oats	Whole grain spelt flour
Instant oatmeal	Teff	Whole grain wheat flakes
Millet	Teff flour	Whole rye flour
Millet flour	Triticale	Whole sorghum (milo)
Oat Groats	Triticale flour	Whole wheat flour
Old fashioned oats	Wheat berries	Wild rice
Quick cooking oats	Wheat groats	
Quinoa	Whole einkorn berries	

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

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



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

Enriched bromated flour	Enriched farina	Enriched rye flour
Enriched corn flour	Enriched rice	Enriched semolina
Enriched durum flour	Enriched rice flour	Enriched wheat flour
Enriched durum wheat flour		Enriched white flour

**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, such as wheat gluten, wheat starch, wheat dextrin, corn starch, corn dextrin, rice starch, tapioca starch, or modified food starch. These are generally present in only small amounts.

**Noncreditable Grains or Flours** (The following ingredients are not whole or enriched grains and cannot be one of the first three grain ingredients)

Any bean/legume flour	Durum flour	Tapioca flour
Any nut/seed flour	Farina	Vegetable flour
Barley malt	Malted barley flour	Wheat flour
Bromated flour	Oat fiber	White flour
Corn fiber	Potato flour	Yellow corn meal
Corn flour	Rice flour	
Degerminated corn meal	Semolina	

**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 credit as a grain ingredient in CACFP. However, this product still 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 (wheat flour) is not whole grain or enriched. However, this item is creditable as a grain that is not being served as a whole grain-rich item because the first grain ingredient is a whole grain.

**Example 3:** A cheese pizza's ingredient list reads: "mozzarella cheese, parmesan cheese, white whole wheat flour, brown rice flour, enriched flour, nonfat milk, water, tomato paste, yeast." This product meets the whole grain-rich criteria using the Rule of Three because the first (white whole wheat flour) and second (brown rice flour) grain ingredients are whole grains, and the third grain ingredient (enriched flour) is enriched.

## Attachment 2

**Whole Grain-Rich: 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 flour 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. Based on this documentation, the bagel meets the whole grain-rich criteria because it contains at least 50 percent whole grains, and the remaining grains are enriched.

**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.

Attachment 3

**QUESTIONS AND ANSWERS**

GRAIN REQUIREMENTS

**1. Does the provision that allows Child Nutrition Program operators to substitute vegetables for the grains requirement in Tribal communities extend to the infant meal pattern?**

Yes. Extending the option to substitute vegetables for grains in the infant meal pattern allows infants to consume a variety of foods and develop taste preferences aligned with an Indigenous diet. USDA recognizes the concern that allowing this flexibility for infants could result in a reduced consumption of critical nutrients, such as iron.

However, the infant meal pattern allows a variety of foods to meet the required meal components for meals and snacks, and only currently requires a grain item at snack when an infant 6-11 months of age is developmentally ready to accept those foods.

Allowing Child Nutrition Programs to serve culturally responsive meals and snacks can improve meal consumption and strengthen relationships between providers, families, and participants.

**2. How do non-grain pasta products credit, such as those made from lentil or chickpeas?**

Non-grain pasta products made from vegetable and/or bean, pea, and/or lentil flours do not credit toward the grains component, but may credit toward the vegetables component or meats/ meat alternates component (in the case of bean, pea, and/or lentil flour), as specified in policy memo CACFP 13-2019, *Crediting Pasta Products Made of Vegetable Flour in the Child Nutrition Programs*, April 17, 2019,

<https://www.fns.usda.gov/school-meals/crediting-pasta-products-made-vegetable-flour-child-nutrition-programs>.

***WHOLE GRAIN-RICH***

**3. Can institutions and facilities 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. Institutions and facilities may instead use any one of the six options presented in this memorandum for determining whether the product meets the whole grain-rich criteria.

**4. Do institutions and facilities have the discretion to choose which meals will include whole grain-rich items?**

Yes. Institutions and facilities 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.

**5. If a facility serves a different group of children 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 institution or facility, not to each child or adult participant. If an institution or facility 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 institutions and facilities that have different groups of participants at each meal (such as one group of children at breakfast and a second

group at lunch) to serve whole grain-rich items at both meals. FNS also permits institutions and facilities to vary the meal in which a whole grain-rich item is served. This will help ensure that all participants are served a variety of whole grains and benefit from the important nutrients they provide.

**6. If a facility only serves one meal per day, does the grain have to be whole grain-rich every day?**

Yes. If an institution or facility only serves one meal or snack per day, then the grain served at that meal or snack must be whole grain-rich to meet the whole grain-rich requirement. When meats and meat alternates are served in place of the grains component at breakfast (allowed a maximum of three times per week), and the institution or facility only serves that one meal per day, a whole grain-rich item does not need to be served.

**7. If a facility only serves an afternoon snack, would all the grains served at snack have to be whole grain-rich?**

Yes. If the facility only serves snack and 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 meal component at snack. A program may offer a reimbursable snack with a fruit and vegetable, milk and fruit, a meat/meat alternate and vegetable, and so forth.

**8. 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 meal 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.

### ***GRAIN-BASED DESSERTS***

**9. Are homemade granola bars or other similar items considered grain-based desserts?**

Yes. Both homemade and commercially prepared granola bars and similar items are considered grain-based desserts and cannot credit toward the grains component in CACFP. Granola bars are denoted with a superscript 4 in Exhibit A, which indicates a grain-based dessert.

**10. Are quick breads considered grain-based desserts?**

No. 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 and continue to be a creditable grain product in CACFP.

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

It depends. Scones and grain puddings can be savory or sweet. Whether a scone or grain pudding is considered a grain-based dessert will vary depending on the specific item.

Sweet scones, sweet bread puddings, and sweet rice puddings are considered grain-based desserts and cannot credit toward the grains component. However, savory scones, such as those made with cheese and herbs, credit like a biscuit and are not considered grain-based desserts. Savory grain puddings, such as one made with spinach and mushrooms, are also 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, they should work with their sponsor or State agency, as appropriate, to make an informed determination.

**12. Are black bean brownies creditable as a grain?**

No. Brownies are considered grain-based desserts and cannot credit toward the grains component in any CACFP meal or snack. In addition, the black beans in a brownie cannot credit toward the meats/meat alternates or vegetables component. This is because they are not easily recognizable as a meats/meats alternates or vegetables, and each portion is not likely to have a sufficient amount of meats/meats alternates or vegetables to contribute to the meats/meats alternates or vegetables component.

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

Yes. Crusts on meats and meat alternates (savory) pies, such as a chicken pot pie, may credit toward the grains component when they contain at least 0.25 ounce equivalent of enriched or whole grains per portion.

**14. If an institution or facility chooses to serve a grain-based dessert with fruit, does the fruit credit toward the fruit requirement?**

Yes. The fruit in the grain-based dessert may credit toward the fruits component. However, the grains portion of a grain-based dessert containing fruit, such as pies, cobblers, or crisps, cannot credit toward the grains component. Institutions or facilities should serve sweetened fruit in moderation to help reduce participants' consumption of added sugars and help children develop a taste preference for unsweetened fruit.



**15. 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 to pancakes or waffles does not make them grain-based desserts. However, FNS strongly encourages institutions and facilities to explore healthier alternatives for toppings, such as fruit or yogurt. Minimizing sweet toppings will help reduce participants' consumption of added sugars. When sugars are added to foods and beverages to sweeten them, they add calories without contributing essential nutrients.

***BREAKFAST CEREALS***

**16. 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 that includes 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 rounds, 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 added sugars per dry ounce to be creditable in the CACFP.

**17. May a provider mix a high-sugar cereal with a low-sugar cereal to meet the added sugars 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 added sugars per dry ounce together with a cereal with 4 grams of added sugars per dry ounce to create a cereal that has 6 grams of added sugars per dry ounce (the added sugars limit for breakfast cereals).

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

**18. Can sugar be added on top of unflavored oatmeal or another breakfast cereal that meets the added sugars limit?**

Breakfast cereals, as purchased, must contain no more than 6 grams of added sugars per dry ounce. Similarly, if an institution or facility makes a breakfast cereal from scratch, such as granola, it must contain no more than 6 grams of added sugars per dry ounce. Institutions and facilities may choose to add toppings to breakfast cereals to increase their appeal. FNS strongly encourages institutions and facilities to offer healthy toppings for breakfast cereals, such as fruit or cinnamon instead of sugar. Minimizing sweet toppings will help reduce participants' consumption of added sugars. When sugars are added to foods and beverages to sweeten them, they add calories without contributing essential nutrients.

**19. If an institution or facility makes homemade granola, how can they determine if it meets the added sugars limit for breakfast cereals?**

When making homemade granola, institutions and facilities must calculate the added sugars 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 added sugars limit if asked during a review.

**COMPLIANCE**

**20. 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.

**21. 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 an institution or facility 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.

**22. If a grain product's ingredient list includes "dough conditioner" (an ingredient to improve the consistency of the dough), 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.