



Public Health  
HEALTH AND HUMAN SERVICES

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CACFP 16-19

Memorandum

To: Institutions Participating in the Child and Adult Care Food Program

From: Arnette Cowan, Head   
Special Nutrition Programs

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

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 CACFP 16-10 "Early Implementation of the Updated Child and Adult Care



## Food Program Meal Pattern Requirements”

([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

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.

If you have questions, please contact the State agency employee assigned to your region.

c: SNP Staff

Attachments

**Attachment 1**

**EXHIBIT A: GRAIN REQUIREMENT FOR CHILD NUTRITION PROGRAMS<sup>1,2</sup>**

<b>Group A</b>	<b>Minimum Serving Size for Group A</b>	<b>Oz Eq for Group A</b>
<ul style="list-style-type: none"> <li>• Bread type coating</li> <li>• Bread sticks (hard)</li> <li>• Chow mein noodles</li> <li>• Savory Crackers (saltines and snack crackers)</li> <li>• Croutons</li> <li>• Pretzels (hard)</li> <li>• Stuffing (dry) Note: weights apply to bread in stuffing.</li> </ul>	<p>1 serving = 20 gm or 0.7 oz            3/4 serving = 15 gm or 0.5 oz            1/2 serving = 10 gm or 0.4 oz            1/4 serving = 5 gm or 0.2 oz</p>	<p>1 oz eq = 22 gm or 0.8 oz            3/4 oz eq = 17 gm or 0.6 oz            1/2 oz eq = 11 gm or 0.4 oz            1/4 oz eq = 6 gm or 0.2 oz</p>
<b>Group B</b>	<b>Minimum Serving Size for Group B</b>	<b>Oz Eq for Group B</b>
<ul style="list-style-type: none"> <li>• Bagels</li> <li>• Batter type coating</li> <li>• Biscuits</li> <li>• Breads (sliced white, whole wheat, French, Italian)</li> <li>• Buns (hamburger and hot dog)</li> <li>• Sweet Crackers<sup>3</sup> (graham crackers - all shapes, animal crackers)</li> <li>• Egg roll skins</li> <li>• English muffins</li> <li>• Pita bread (white, whole wheat, whole grain-rich)</li> <li>• Pizza crust</li> <li>• Pretzels (soft)</li> <li>• Rolls (white, whole wheat, whole grain-rich)</li> <li>• Tortillas (wheat or corn)</li> <li>• Tortilla chips (wheat or corn)</li> <li>• Taco shells</li> </ul>	<p>1 serving = 25 gm or 0.9 oz            3/4 serving = 19 gm or 0.7 oz            1/2 serving = 13 gm or 0.5 oz            1/4 serving = 6 gm or 0.2 oz</p>	<p>1 oz eq = 28 gm or 1.0 oz            3/4 oz eq = 21 gm or 0.75 oz            1/2 oz eq = 14 gm or 0.5 oz            1/4 oz eq = 7 gm or 0.25 oz</p>

<sup>1</sup>Under the CACFP, the following foods are whole grain or enriched or made with enriched or whole-grain meal and/or flour, bran, and/or germ. For meals and snacks served to children and adults, at least one serving of grains per day in the CACFP must be whole grain-rich starting October 1, 2017. Under the NSLP and SBP, the following food quantities from Groups A-G, must contain at least 16 grams of whole grain or can be made with 8 grams of whole grain and 8 grams of enriched meal and/or enriched flour to be considered whole grain-rich.

<sup>2</sup>Some of the following foods, or the accompaniments, may contain more sugar, salt, and/or fat than others. This should be considered when deciding how often to serve them.

<sup>3</sup> Considered a grain-based dessert and cannot count towards the grain component at any meal served under the CACFP beginning October 1, 2017, as specified in §226.20(a)(4). Allowed only as dessert at lunch served under the NSLP as specified in §210.10.

<b>Group C</b>	<b>Minimum Serving Size for Group C</b>	<b>Oz Eq for Group C</b>
<ul style="list-style-type: none"> <li>• Cookies<sup>3</sup> (plain - includes vanilla wafers)</li> <li>• Cornbread</li> <li>• Corn muffins</li> <li>• Croissants</li> <li>• Pancakes</li> <li>• Pie crust (dessert pies<sup>3</sup>, cobbler<sup>3</sup>, fruit turnovers<sup>4</sup>, and meat/meat alternate pies)</li> <li>• Waffles</li> </ul>	1 serving = 31 gm or 1.1 oz 3/4 serving = 23 gm or 0.8 oz 1/2 serving = 16 gm or 0.6 oz 1/4 serving = 8 gm or 0.3 oz	1 oz eq = 34 gm or 1.2 oz 3/4 oz eq = 26 gm or 0.9 oz 1/2 oz eq = 17 gm or 0.6 oz 1/4 oz eq = 9 gm or 0.3 oz
<b>Group D</b>	<b>Minimum Serving Size for Group D</b>	<b>Oz Eq for Group D</b>
<ul style="list-style-type: none"> <li>• Doughnuts<sup>3</sup> (cake and yeast raised, unfrosted)</li> <li>• Cereal bars, breakfast bars, granola bars<sup>4</sup> (plain)</li> <li>• Muffins (all, except corn)</li> <li>• Sweet roll<sup>4</sup> (unfrosted)</li> <li>• Toaster pastry<sup>4</sup> (unfrosted)</li> </ul>	1 serving = 50 gm or 1.8 oz 3/4 serving = 38 gm or 1.3 oz 1/2 serving = 25 gm or 0.9 oz 1/4 serving = 13 gm or 0.5 oz	1 oz eq = 55 gm or 2.0 oz 3/4 oz eq = 42 gm or 1.5 oz 1/2 oz eq = 28 gm or 1.0 oz 1/4 oz eq = 14 gm or 0.5 oz
<b>Group E</b>	<b>Minimum Serving Size for Group E</b>	<b>Oz Eq for Group E</b>
<ul style="list-style-type: none"> <li>• Cereal bars, breakfast bars, granola bars<sup>4</sup> (with nuts, dried fruit, and/or chocolate pieces)</li> <li>• Cookies<sup>3</sup> (with nuts, raisins, chocolate pieces and/or fruit purees)</li> <li>• Doughnuts<sup>4</sup> (cake and yeast raised, frosted or glazed)</li> <li>• French toast</li> <li>• Sweet rolls<sup>4</sup> (frosted)</li> <li>• Toaster pastry<sup>4</sup> (frosted)</li> </ul>	1 serving = 63 gm or 2.2 oz 3/4 serving = 47 gm or 1.7 oz 1/2 serving = 31 gm or 1.1 oz 1/4 serving = 16 gm or 0.6 oz	1 oz eq = 69 gm or 2.4 oz 3/4 oz eq = 52 gm or 1.8 oz 1/2 oz eq = 35 gm or 1.2 oz 1/4 oz eq = 18 gm or 0.6 oz
<b>Group F</b>	<b>Minimum Serving Size for Group F</b>	<b>Oz Eq for Group F</b>
<p><i>(These items are only allowed under the NSLP and SBP)</i></p> <ul style="list-style-type: none"> <li>• Cake<sup>3</sup> (plain, unfrosted)</li> <li>• Coffee cake<sup>4</sup></li> </ul>	1 serving = 75 gm or 2.7 oz 3/4 serving = 56 gm or 2 oz 1/2 serving = 38 gm or 1.3 oz 1/4 serving = 19 gm or 0.7 oz	1 oz eq = 82 gm or 2.9 oz 3/4 oz eq = 62 gm or 2.2 oz 1/2 oz eq = 41 gm or 1.5 oz 1/4 oz eq = 21 gm or 0.7 oz

<sup>3</sup> Considered a grain-based dessert and cannot count towards the grain component at any meal served under the CACFP beginning October 1, 2017, as specified in §226.20(a)(4). Allowed only as dessert at lunch served under the NSLP as specified in §210.10.