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DIVISION OF PUBLIC HEALTH

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CACFP 18-08

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Memorandum

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

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State Director, Special Supplemental Nutrition Program for Women, Infants
and Children (WIC)
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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) established in the final rule, "Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010." This revision further clarifies how to determine if a grain product meets the whole grain-rich criteria. It also includes updated Questions and Answers in Attachment 3. This memorandum supersedes CACFP 01-2018, *Grain Requirements in the Child and Adult Care Food Program; Questions and Answers*, October 19, 2017.

Background

This memorandum provides 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, the agency recognizes that CACFP operates differently than the National School Lunch Program (NSLP) and School Breakfast Program (SBP). Therefore, there are some instances when the CACFP guidance is different from the School Meal Programs. For more information on the preschool meal pattern requirements for NSLP and SBP, see

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SP 01-2018, *Updated Infant and Preschool Meal Patterns in the National School Lunch Program and School Breakfast Program; Questions and Answers* (<https://www.fns.usda.gov/nslp/updated-infant-and-preschool-meal-patterns-national-school-lunch-program-and-school-breakfast>).

The final rule 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 *2015-2020 Dietary Guidelines for Americans (Dietary Guidelines)*, which provide grain recommendations in oz eq. 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 crediting oz eq in the future.

I. REQUIREMENTS

Grain is a required component at breakfast, lunch, and supper meals, and is an optional component at snack. 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 in order to be creditable.

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)). Any additional grains served that do not meet the whole grain-rich criteria described below may still be creditable if they are made of the required grains. State agencies and Program operators are encouraged to continue using the methods they previously had in place to determine if a grain item was creditable. The *Food Buying Guide for Child Nutrition Programs (the Food Buying Guide)* (<https://foodbuyingguide.fns.usda.gov>) is a source of crediting information for CACFP. Appendix E lists the steps for identifying creditable grain products (<https://foodbuyingguide.fns.usda.gov/Appendix/ResourceAppendixE>). For easy reference, the Flowchart for Determining Creditable Grains/Breads from the *Food Buying Guide* is included as Attachment 1 of this memorandum.

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 particular 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 is a grain that has not had its nutrient-rich germ and bran removed, and therefore does not need enrichment. Foods that meet the whole grain-rich criteria are foods that contain at least 50 percent whole grains and the remaining grains in the food are enriched, or are 100 percent whole grain. At least one serving of grains per day must be whole grain-rich. This whole grain-rich requirement only applies to meals served to children and adults; it 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 Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)-approved whole grain food list.

Any grain product found on a State agency’s WIC-approved whole grain food list meets CACFP whole grain-rich criteria. Providers can obtain a copy of a State agency’s WIC-approved whole grain food list by contacting the WIC State agency. For a list of WIC State agency contacts, please see www.fns.usda.gov/wic/wic-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