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**15. 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.

**16. 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.

**15. 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.

Centers or day care homes that only serve a 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. However, in that situation, if a grain is served, it must be whole grain-rich.

**16. 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.

**17. 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. Conversely, if a center or day care home only serves one meal (breakfast, lunch or supper) per day then the grain served at that meal must be whole grain-rich.

**II. GRAIN-BASED DESSERTS**

**1. Why are grain-based desserts no longer allowed to contribute to the grain component of a meal?**

The Dietary Guidelines for Americans (Dietary Guidelines) identify grain-based desserts as sources of added sugars and saturated fats. It recommends Americans reduce their consumption of added sugars and saturated fats. The Richard B. Russell National School Lunch Act requires the CACFP meal patterns to be consistent with the Dietary Guidelines. Therefore, in order to be more consistent with the Dietary Guidelines, grain-based desserts cannot count towards the grain components in CACFP under the updated meal pattern requirements. This will help reduce the amount of added sugars and saturated fats that children and adults consume.

**2. \*\*\*Are there any criteria for identifying grain-based desserts?**

In Exhibit A of this memorandum, foods are designated as grain-based desserts with a superscript 3 or 4. These foods cannot be part of a reimbursable meal in the CACFP. There is not a specific amount of sugar, fat, or any other nutrient that qualifies a grain as a dessert. Establishing nutrient standards would increase complexity and burden on centers and day care homes because it would require evaluation of each grain item served against these nutrient standards. The following items are designated as grain-based desserts: cookies, sweet pie crusts, doughnuts, cereal bars, breakfast bars, granola bars, sweet rolls, toaster pastries, cake, and brownies.

It is important to note that cookies do not have a standard of identity, so a food manufacturer may come up with fanciful 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 higher levels of added sugars or saturated fats. Menu planners should use their discretion when serving these foods.

**3. \*\*\*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. Based on stakeholder feedback, FNS decided using categories to define grain-based desserts was the best approach versus establishing nutrient standards or preparation requirements.

**4. Are quick breads, such as banana bread and zucchini bread, still allowed?**

Yes. Quick breads are credited in the same group as muffins under Group D in Exhibit A (Attachment A), and both may continue to be part of a reimbursable meal.

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

Sweet scones, sweet bread puddings, and 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, credit 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, is 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 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.

**6. 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 component. This is because they are not easily recognizable as a meat/meat alternate and each portion is not likely to have a sufficient amount of meat/meat alternate (¼ ounce equivalency) to contribute to the meat/meat alternate component.

**7. \*\*\*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 towards the grain component if it contains at least ¼ serving grain per portion. For more information on how crusts on savory pies credit, please see the *Food Buying Guide for Child Nutrition Programs* available at <http://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs> and the web-based interactive *Food Buying Guide* at <https://foodbuyingguide.fns.usda.gov/>.

**8. Can centers and day care homes serve cake or another grain-based dessert for special celebrations, such as a birthday?**

Centers and day care homes may choose to serve grain-based desserts, such as cakes or cookies, during celebrations or other special occasions as an additional food item that is not reimbursable. FNS recognizes that there may be times when a center or day care home would like to serve foods or beverages that are not reimbursable. FNS encourages centers and day care homes to use their discretion when serving non-reimbursable foods and beverages, which may be higher in added sugar, saturated fats, and sodium, to ensure children and adult participants' nutritional needs are met.

**9. 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.

**10. May non-profit food service account funds be used to purchase grain-based desserts?**

No. CACFP centers or day care homes may not use Program funds to purchase non-creditable foods. Grain-based desserts are not creditable in the CACFP under the updated meal pattern requirements. One exception to this policy is condiments, herbs, and spices. While condiments, herbs, and spices cannot credit towards the meal pattern requirements, condiments served with creditable foods and herbs and spices used to prepare and enhance the flavor of meals may be purchased with non-profit food service account funds.

**11. 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, but all breakfast cereals served in the CACFP must be whole grain-rich, enriched, or fortified and contain no more than 6 grams of sugar per dry ounce.

#### **2. \*\*\*How do centers and day care homes know if a ready-to-eat breakfast cereal is "fortified"?**

Cereal products that have been fortified are labeled as such and have an ingredient statement similar to the following (for EXAMPLE purposes only): "Ingredients: Whole wheat, sugar, oats, contains 2% or less of salt, baking soda, caramel color, annatto color, BHT for freshness. Vitamins and Minerals: Vitamin C (sodium ascorbate, ascorbic acid), niacinamide, vitamin B6 (pyridoxine hydrochloride), reduced iron, zinc oxide, folic acid, vitamin B2 (riboflavin), vitamin B1 (thiamin hydrochloride), vitamin A palmitate, vitamin D, vitamin B12."

#### **3. 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.

**4. \*\*\*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 brown 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.

**5. \*\*\*How does a center or day care home determine if a breakfast cereal has no more than 6 grams of sugar per dry ounce (21.2 grams of sugar per 100 grams of dry cereal)?**

As a reminder breakfast cereals must meet the sugar limit and be whole grain-rich, enriched, or fortified to be creditable in CACFP. There are several ways a center or day care home can determine if a breakfast cereal is within the sugar limit. First, centers and day care homes can use any State agency's Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) approved breakfast cereal list. Some stores also have labels on the shelves indicating which breakfast cereals are WIC-approved. All WIC-approved breakfast cereals contain no more than 6 grams of sugar per dry ounce (21.2 grams of sugar per 100 grams of dry cereal).

Second, FNS developed an easy-to-use chart to further help centers and day care homes identify breakfast cereals within the sugar limit. The chart is available on the second page of 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>).

Lastly, centers and day care homes may do some math to determine the sugar content of a breakfast cereal. Using the Nutrition Facts label, the center or day care home may divide the amount of sugar per serving (listed towards the middle) by the serving size in grams (listed at the top). If the amount of sugar per serving divided by the serving size in grams is 0.212 or less, then the cereal is within the sugar limit and may be creditable in CACFP. For example, Cereal A's Nutrition Facts Labels shows that the serving size is 55 grams and the amount of sugar per serving is 13 grams. Therefore, 13 grams (sugar) divided by 55 grams (serving size) equals 0.236. Cereal A exceeds the sugar limit because 0.236 is greater than 0.212.

**6. \*\*\*There are times when a breakfast cereal is within the sugar limit when using the chart in the "Choosing Breakfast Cereals That Are Lower in Added Sugars" worksheet, but is not within the sugar limit when using the calculation in this memorandum. Which one is correct?**

Both the chart and the calculation are valid ways of demonstrating a breakfast cereal meets the sugar limit (no more than 6 grams of sugar per dry ounce, or 21.2 grams of sugar per 100 grams of dry cereal).

The discrepancy between the chart and calculation comes from rounding. To develop the chart, FNS used the standard rules for rounding: round up to the next whole number if the number after the decimal point is 0.5 or greater, and round down if the number is less than 0.5. This results in some breakfast cereals meeting the sugar limit when using the chart, but not the calculation. The Food and Drug Administration uses the same rounding rules for the Nutrition Facts label

(<https://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm064932.htm>). Therefore, some leniency is necessary.

FNS developed an alternate calculation that uses rounding and aligns with the chart that centers and day care homes may use:

- 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.

A breakfast cereal that falls within the sugar limit using the chart or either of the calculations may be creditable. As a reminder, breakfast cereals must meet the sugar limit and be whole grain-rich, enriched, or fortified to be creditable in the CACFP.

**7. 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.

#### **IV. COMPLIANCE**

**1. \*\*\*When submitting menus for review, do centers and day care homes need to document which grains are whole grain-rich?**

It is at the State agency's discretion to determine what is acceptable documentation to demonstrate compliance with the whole grain-rich requirement. Identifying which grains are whole grain-rich on the menus is a good best practice and is strongly recommended by FNS.

Identifying whole grain-rich foods on a menu may be done by using terms or abbreviations such as "whole grain-rich", "WGR", "whole wheat", or simply listing a whole grain. For example, a menu may say: "peanut butter and jelly sandwich on whole grain-rich bread", "whole wheat pasta and chicken", or "brown rice and vegetables". Another option could be to use a check box to identify which grain is whole grain-rich on the menu. Common and usual names for whole grains that are helpful to know and can be used to identify whole grain-rich foods on menus are:

- The word "whole" listed before a grain, such as "whole wheat" or "whole corn";
- The words "berries" and "groats" are used to designate a whole grain, such as "wheat berries" or "oat groats";
- Rolled oats and oatmeal (including old fashioned, steel cut, quick cooking, and instant oatmeal); and
- Other whole-grain foods that do not use the word "whole" in their description, such as brown rice, brown rice flour, wild rice, quinoa, millet, triticale, teff, amaranth, buckwheat, and sorghum.

When conducting on-site reviews, it is the State agency's or sponsor's responsibility, as applicable, to verify the grains served are creditable, including the whole grain-rich items served meet the whole grain-rich criteria presented in this memorandum

**2. \*\*\*If a day care home serves breakfast and snack, and a grain is served at both breakfast and snack, but neither of the grains are 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 provided a transition period for the updated CACFP meal patterns for Fiscal Year 2018 (October 1, 2017 through September 30, 2018). Please see 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.

**3. \*\*\*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.

**4. \*\*\* When reviewing food labels to determine if a grain is creditable, how much non-creditable grain is acceptable?**

Centers and day care homes should purchase and serve grains with an insignificant amount of non-creditable grains. Centers and day care homes can be confident that a food contains an insignificant amount of non-creditable grains when they are listed after a “contains 2% or less” statement on the ingredient list. For example, an ingredient list may state “contains less than 2% of wheat flour and corn starch”.

To determine if a grain is creditable, centers and day care homes should use the *rule of three* described on page 4 of the body of this memorandum. State agencies have the discretion to determine what is acceptable documentation to demonstrate that a grain contains an insignificant amount of non-creditable grains. FNS encourages State agencies to continue to use the methods they currently have in place to determine if grains are creditable.

**5. \*\*\*If a grain says “dough conditioner” in the ingredient list, is the grain still creditable?**

Yes. 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 found in the dough conditioner sub-listing are considered insignificant; therefore the grain item is creditable.