

QUESTIONS AND ANSWERS

I. WHOLE GRAIN-RICH

1. How will centers and day care homes identify whole grain-rich foods?

Centers and day care homes can identify whole grain-rich foods using one of several methods. First, if a whole grain is listed as the first ingredient on the product's ingredient list or second after water, then the product meets the whole grain-rich criteria. Second, a center or day care home can work with a manufacturer to get the proper manufacturing documentation demonstrating that whole grains are the primary grain ingredient by weight. For foods prepared by a CACFP center or day care home, a recipe can be used to determine that whole grains are the primary grain ingredient by weight.

Additionally, centers and day care homes can look for one of the following FDA 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."

In recognizing that whole grain-rich products are not always easy to identify, FNS is developing training worksheets in English and Spanish to help CACFP centers and day care homes identify whole grain-rich foods. Additionally, USDA's Team Nutrition developed the *Nutrition and Wellness Tips for Young Children: Provider Handbook for the Child and Adult Care Food Program* that includes tips on how to include more 100% whole-grain foods on menus (http://www.fns.usda.gov/sites/default/files/whole_grains.pdf). Foods that contain 100% whole grains meet the whole grain-rich criteria.

2. Can centers and day care homes use the Whole Grain Stamp (from the Whole Grain Council) to determine if a grain product meets the whole grain-rich criteria?

No. While the Whole Grain Stamp provides useful information on the amount of whole grains a product contains, the product must still be evaluated against the whole grain-rich criteria outlined in this memorandum. Products that display the Whole Grain Stamp contain at least 8 grams of whole grain per serving. However, they may also contain some non-enriched refined flour which does not meet the grains criteria for Child Nutrition Programs. Therefore, just because a product has 8 grams of whole grains, does not mean the product meets the whole grain-rich criteria.

3. Do grain products have to be 100% whole grain to meet the whole grain-rich requirement?

No, grain products do not need to be 100% whole grain to meet the whole grain-rich criteria. However, grain products that contain 100% whole grain do meet the whole grain-rich criteria.

Attachment 2

Whole grain-rich foods contain at least 50% whole grains and the remaining grains, if any, must be enriched.

For child and adult meals and snacks, centers and day care homes must serve at least one whole grain-rich food per day. Requiring that at least one grain served per day be whole grain-rich, instead of 100% whole grain, gives centers and day care homes flexibility in choosing what grains they serve while still offering the nutritional benefits of whole grains. This flexibility will make it easier for centers and day care homes to find grain products that meet the updated meal pattern requirements.

4. Are fully cooked grain products, such as pasta, whose ingredient list has water as the first ingredient and a whole grain as the second ingredient, considered whole grain-rich?

Yes, a grain product is considered whole grain-rich if water is listed as the first ingredient and a whole grain is listed as the second ingredient on the ingredient list.

5. Can wheat bread, rolls, and buns labeled as “100% whole wheat” be used to meet the whole grain-rich requirement?

Yes, grain products that are specifically labeled as “whole wheat bread,” “entire wheat bread,” “whole wheat rolls,” “entire wheat rolls,” “whole wheat buns” and “entire wheat buns” are 100% whole wheat and are easily identifiable as meeting the whole grain-rich requirement. These products will not have any refined grains listed in the ingredient statement. Please note that foods with the label “whole grain” do not necessarily meet the whole grain-rich criteria.

6. In a recipe for bread, would ingredients listed as 2 cups of whole-wheat flour and 2 cups of enriched white flour meet the whole grain-rich requirement?

Yes, as long as there are no other grain ingredients in the food, a food that contains 2 cups of whole-wheat flour and 2 cups of enriched white flour would meet the whole grain-rich requirement. This is because it contains at least 50% whole grains and the remaining grains in the food are enriched.

7. 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.

III. GRAIN-BASED DESSERTS AND BREAKFAST CEREALS

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 and recommends Americans reduce their consumption of added sugars and saturated fats. The Healthy, Hunger-Free Kids Act of 2010 required USDA to revise the CACFP meal patterns to better align them with the Dietary Guidelines. Therefore, in order to be more consistent with the Dietary Guidelines, grain-based desserts cannot be counted towards the grain components in CACFP starting October 1, 2017.

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 are not eligible for reimbursement in the CACFP. There is not a specific amount of sugar, fat, or any other nutrient that qualifies a grain product as a dessert. The following items are designated as 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.

It is important to note that crackers and 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. For example, a cookie may be called a “breakfast round.” The menu planner should use common perceptions of the product as a way to determine if the product is a grain-based dessert. 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 sugar, fat, and sodium. 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. There are no exceptions to allow a grain-based dessert to count towards the grain component, including the place of preparation or the preparation method.

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

Yes, quick breads are credited in the same group as muffins under Group D in Exhibit A, and both may continue to contribute towards the grain component.

5. 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.

6. If a center or day care home chooses to serve a grain-based dessert with fruit, can the fruit count towards the fruit requirement?

Yes, the fruit in the grain-based dessert can credit towards the fruit component. The grains portion of a grain-based dessert with fruit, such as pies, cobblers, or crisps, cannot count towards the grain component. Centers and day care homes should serve sweetened fruit in moderation to help reduce children and adults' consumption of added sugars and help children develop a taste preference for unsweetened fruit.

7. Pancakes and waffles are not grain-based desserts according to Exhibit A. If syrup, honey, jam or another sweet topping is served with the pancakes or waffles, are they then considered grain-based desserts?

No, adding a sweet topping, such as syrup, to pancakes or waffles does not make them grain-based desserts and they can continue to be counted towards the grain component. However, FNS strongly encourages centers and day care homes to explore healthier alternatives for toppings, such as fruit or yogurt. Minimizing sweet toppings will help reduce children's and adults' consumption of added sugars. When sugars are added to foods and beverages to sweeten them, they add calories without contributing essential nutrients.

8. 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)?

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).

Second, 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 (serving size) divided by 55 grams of sugar equals 0.236. Cereal A exceeds the sugar limit because 0.236 is greater than 0.212.

FNS is developing an easy-to-use chart to further help CACFP centers and day care homes identify breakfast cereals within the sugar limit.

III. COMPLIANCE

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

Yes, starting October 1, 2017, centers and day care homes must document when a food is whole grain-rich on their menu and may do this by using terms such as "whole grain-rich," "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." 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, 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.

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

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.

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 and the menu demonstrates that a whole grain-rich grain was planned for the missed meal(s), no meals will be disallowed on the basis that the whole grain-rich requirement was not met. Menus must show that at least one whole grain-rich grain is offered each day the center or home is operating.

4. **If a different group of children are at lunch than at breakfast, do both meals have to contain a whole grain-rich grain?**

No, the whole grain-rich requirement applies to the center or day care home, not to each child or adult participant. If a center or day care home serves breakfast and lunch and two different groups of children or adults are at each meal, only one meal must contain a whole grain-rich food.

FNS strongly encourages centers and day care homes that have different groups of participants at each meal (such as one group of children at breakfast and a second group at lunch) to vary the meal in which a whole grain-rich grain 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 whole grains and benefit from the important nutrients they provide.

5. **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 starting October 1, 2017. 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.