



Oregon Department of Education

Kate Brown, Governor

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December 14, 2016

To: Sponsors of Child and Adult Care Food Program

RE: **CACFP New Meal Pattern – Effective October 1, 2017**
Grain Requirements in the Child and Adult Care Food Program; Q and As
CACFP 02-2017

The Oregon Department of Education Child Nutrition Programs (ODE CNP) received guidance from USDA on Grain Requirements in the Child and Adult Care Food Program for the current meal pattern and the new meal pattern to be implemented October 1, 2017.

ODE CNP recognizes that many sponsors prefer to begin implementing the new meal pattern requirements as soon as possible. ODE CNP will not provide an option for sponsors for early implementation of the new meal pattern requirements. Implementing currently unallowable foods and practices to the meal pattern early will result in non-reimbursable meals. ODE CNP will be reviewing menus based on the current meal pattern until October 1, 2017.

Background

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**.

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/.

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 Oregon's Women, Infants, and Children (WIC) approved breakfast cereal list. Sponsors may find the Oregon WIC approved cereal list here: [Oregon WIC Food 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.

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 your assigned Child Nutrition Specialist.

Sincerely,



Lynne Reinoso, Manager, Community Nutrition
Child Nutrition Programs
Office of Student Services