Child and Adult Care Food Program (CACFP)



Guide to Meeting the Whole Grain-rich Requirement for the CACFP

Child Care Centers • Family Day Care Homes • Emergency Shelters
Emergency Shelters • At-risk Afterschool Care Centers • Adult Day Care Centers





Revised March 2024

Connecticut State Department of Education Bureau of Child Nutrition Programs 450 Columbus Boulevard, Suite 504 Hartford, CT 06103-1841

Guide to Meeting the Whole Grain-rich Requirement for the CACFP

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/WGR_Requirement_CACFP.pdf

Project Director Susan S. Fiore, M.S., R.D., Nutrition Education Coordinator

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: https://www.usda.gov/sites/default/files/documents/ad-3027.pdf, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

- mail: U.S. Department of Agriculture
 Office of the Assistant Secretary for Civil Rights
 1400 Independence Avenue, SW
 Washington, D.C. 20250-9410; or
- 2. fax: (833) 256-1665 or (202) 690-7442; or
- 3. email: program.intake@usda.gov

This institution is an equal opportunity provider.

The Connecticut State Department of Education is committed to a policy of equal opportunity/affirmative action for all qualified persons. The Connecticut Department of Education does not discriminate in any employment practice, education program, or educational activity on the basis of race; color; religious creed; age; sex; pregnancy; sexual orientation; workplace hazards to reproductive systems, gender identity or expression; marital status; national origin; ancestry; retaliation for previously opposed discrimination or coercion, intellectual disability; genetic information; learning disability; physical disability (including, but not limited to, blindness); mental disability (past/present history thereof); military or veteran status; status as a victim of domestic violence; or criminal record in state employment, unless there is a bona fide occupational qualification excluding persons in any of the aforementioned protected classes. Inquiries regarding the Connecticut State Department of Education's nondiscrimination policies should be directed to: Attorney Louis Todisco, Connecticut State Department of Education, by mail 450 Columbus Boulevard, Hartford, CT 06103-1841; or by telephone 860-713-6594; or by email louis.todisco@ct.gov.

Contents

About this Guideiv		
About the CACFP Meal Patterns	V	
CSDE Contact Information	vi	
Abbreviations and Acronyms	vii	
1 — Overview of Grain Requirements	1	
Grain-based Desserts Do Not Credit	2	
Required Servings	3	
Table 1-1. Required oz eq for the grains component	3	
Determining Oz Eq		
Method 1: USDA's Exhibit A chart	4	
Method 2: creditable grains	4	
Grain crediting tools	5	
Whole Grain-rich (WGR) Requirement	6	
Overview of methods to evaluate foods for WGR compliance		
Whole Grain versus WGR	7	
Reviewing the Ingredients Statement	7	
Considerations for Reducing Choking Risks for Young Children	8	
2 — Creditable Grains	1	
Whole Grains	1	
Grain name states "whole"	1	
Other names for whole grains	1	
Food and Drug Administration (FDA) standard of identity		
WIC-approved whole grain foods list		
Nixtamalized corn ingredients		
Reconstituted grains		
Enriched Grains	4	
Bran and Germ	4	

3 –	- WGR Requirement for the CACFP	5
	WGR Criteria for Commercial Foods	6
	WGR Criteria for Foods Made from Scratch	6
	Recipe measurements	6
	Steps for determining if a recipe is WGR	7
	Menu Planning Considerations for WGR Foods	9
	Menu planning for different groups of participants at each meal	9
4 –	- Methods to Identify WGR Foods	11
	Table 4-1. Methods to identify WGR foods for the CACFP	11
	Table 4-2. Steps for determining if grain foods meet the CACFP WGR criteria	12
	Method 1: Rule of Three	13
	Noncreditable grains	14
	Grain derivatives	14
	Table 4-3. Examples of noncreditable grains for the Rule of Three	15
	When to ignore noncreditable grains	16
	Table 4-4. Determining if commercial grain products meet the Rule of Three	
	Table 4-5. Determining if commercial combination foods meet the Rule of Three ¹	18
	Method 2: WIC Approved Foods List	19
	Method 3: Documentation	19
	Method 4: WGR Criteria for Schools	19
	Method 5: FDA Whole Grain Health Claim	20
	Method 6: Labels for Foods with FDA Standard of Identity	20
	Table 4-6. Bread and pasta products with a standard of identity	
	Label information that does not indicate a food is WGR	
	WGR Criteria for RTE Breakfast Cereals	
5 –	- WGR Documentation	23
	Documentation for Commercial WGR Products	23
	CN labels	23
	PFS forms	23
	When a PFS is Required for Commercial WGR Grain Products	24
	Documentation for WGR Foods Made from Scratch	25

6 –	- How to Use the Rule of Three	27
	Coding of Ingredients in the Crediting Examples	27
	Table 6-1. Definitions for common ingredients in commercial grain products	
	Product 1: Whole-wheat bagel (group B)	29
	Product 2: English muffin (group B)	
	Product 3: Bread sticks (group A)	
	Product 4: Oat bread (group B)	
	Product 5: Blueberry muffin (group D)	33
	Product 6: Italian bread (group B)	34
	Product 7: Wheat roll (group B)	35
	Product 8: Waffles made with whole wheat (commercial product in group C)	36
	Product 9: French toast (group E)	37
	Product 10: Breaded chicken nuggets (combination food with breading from group A)	38
	Product 11: Cheese ravioli (combination food with pasta from group H	39
	Product 12: Breaded chicken patty (combination food with breading from group A)	40
	Product 13: Chicken vegetable egg roll (combination food with egg roll from group B)	41
7 –	– How to Evaluate a Grain Product's PFS	43
	Parts of the USDA's PFS Form for Grains	43
	Parts of the USDA's PFS Form for Grains	44
	Table 7-1. Sample PFS for grams of creditable grains	45
	Steps for Reviewing a PFS for Creditable Grains	46
	Common Compliance Issues for PFS Forms for Grain Products	50
8 –	– Resources	51
	Breakfast Cereals	51
	Crediting Documentation for Grains	51
	Crediting Requirements for Grains	53
	Crediting Grain Foods Made from Scratch	54
	Meal Patterns	55
	Ounce Equivalents	56
	WGR Criteria	57
C1	0004#87	50

About this Guide

The Connecticut State Department of Education's (CSDE) *Guide to Meeting the Whole Grain-rich* Requirement for the CACFP contains comprehensive information and resources on meeting the whole grain-rich (WGR) requirement of the U.S. Department of Agriculture's (USDA) Child and Adult Care Food Program (CACFP) meal patterns for children and adult day care center participants. The WGR requirement applies to all CACFP facilities, including child care centers, at-risk afterschool care centers, emergency shelters, family day care homes, and adult day care centers. The WGR requirement does not apply to the CACFP infant meal patterns for birth through 11 months.

This guide:

- reviews the menu planning considerations for WGR foods at meals and snacks;
- identifies the WGR criteria for commercial grain products and grain foods made from scratch;
- describes the six methods to identify WGR foods;
- identifies the required crediting documentation for WGR foods;
- provides examples of how to evaluate commercial grain products and recipes for WGR compliance; and
- indicates how to evaluate the accuracy of a manufacturer's product formulation statement (PFS) for commercial grain products.

The contents of this guide are based on the current CACFP regulations and policies as of the date of this publication. This information is subject to change. The CSDE will update this guide as the USDA issues additional policies and guidance regarding the CACFP meal patterns. Please check the "Whole Grain-rich Requirement" section of the CSDE's Crediting Foods in CACFP Child Care Programs or Crediting Foods in CACFP Adult Day Care Centers webpage for the most current version. For more information, contact Susan S. Fiore, M.S., R.D., Nutrition Education Coordinator, at susan.fiore@ct.gov or 860-807-2075.

The mention of trade names, commercial products, or organizations does not imply approval or endorsement by the CSDE or the USDA.

About the CACFP Meal Patterns

The CACFP meal patterns are defined by the U.S. Department of Agriculture's (USDA) final rules below and are specified in 7 CFR 226.20(c) of the CACFP regulations.

- Final Rule (81 FR 24347): Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010 (April 25, 2016):
 https://www.federalregister.gov/documents/2016/04/25/2016-09412/child-and-adult-care-food-program-meal-pattern-revisions-related-to-the-healthy-hunger-free-kids-act
- Final Rule Correction (81 FR 75671): CACFP Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010 (November 1, 2016): https://www.federalregister.gov/documents/2016/11/01/2016-26339/child-and-adult-care-food-program-meal-pattern-revisions-related-to-the-healthy-hunger-free-kids-act
- Final Rule (87 FR 6984): Child Nutrition Programs: Transitional Standards for Milk, Whole Grains, and Sodium (February 7, 2022):
 https://www.federalregister.gov/documents/2022/02/07/2022-02327/child-nutrition-programs-transitional-standards-for-milk-whole-grains-and-sodium

For detailed guidance on the CACFP meal patterns for children, refer to the CSDE's *Guide to Meeting the Meal Pattern Requirements for CACFP Child Care Programs* and visit the CSDE's Meal Patterns for CACFP Child Care Programs webpage.

For detailed guidance on the CACFP adult meal patterns, refer to the CSDE's *Guide to Meeting the Meal Pattern Requirements for CACFP Adult Day Care Centers* and visit the CSDE's Meal Patterns for CACFP Adult Day Care Centers webpage.

CSDE Contact Information

For questions regarding the CACFP, please contact the CACFP staff in the CSDE's Bureau of Child Nutrition Programs

CACFP Staff			
Child Care Centers	Family Day Care Homes		
Bernice Amponsah	Flor Sprouse		
860-807-2117	860-713-6849		
bernice.amponsah@ct.gov	flor.sprouse@ct.gov		
Susan Boyle			
860-807-2074			
susan.boyle@ct.gov			
Benedict Onye			
860-807-2080			
benedict.onye@ct.gov			
Connecticut State Department of Education			
Bureau of Child Nutrition Programs			
450 Columbus Boulevard, Suite 504			

Hartford, CT 06103-1841

Abbreviations and Acronyms

AR Administrative Review

CACFP Child and Adult Care Food Program

CFR Code of Federal Regulations

CN Child Nutrition

CNP Child Nutrition Programs

CSDE Connecticut State Department of Education

FBG Food Buying Guide for Child Nutrition Programs (USDA)

FDA Food and Drug Administration

FNS Food and Nutrition Service, U.S. Department of Agriculture

FR Federal Register

ICN Institute of Child Nutrition

NSLP National School Lunch Program

oz eq ounce equivalents

PFS product formulation statement

RTE ready to eat

SBP School Breakfast Program

USDA U.S. Department of Agriculture

WGR whole grain-rich

WIC Special Supplemental Nutrition Program for Women, Infants and Children



1 — Overview of Grain Requirements

The grains component of the CACFP meal patterns for children and adult participants includes a wide variety of commercial grain products and grain foods made from scratch, such as:

- breads, biscuits, bagels, rolls, tortillas, and muffins;
- snack products, such as crackers (including animal crackers and graham crackers), hard pretzels, hard bread sticks, tortilla chips, and popcorn;
- certain grain-based desserts, such as cookies, granola bars, cereal bars, cake, and pastries (subject to crediting restrictions);
- cereal grains, such as buckwheat, brown rice, bulgur, and quinoa;
- ready-to-eat (RTE) breakfast cereals;
- cooked breakfast cereals (instant and regular), such as oatmeal;
- bread products used as an ingredient in another menu item, such as combination foods, e.g., breading on fish or poultry and pizza crust in pizza; and
- pasta products, such as macaroni, spaghetti, noodles, orzo, and couscous.



To credit as the grains component, foods must be made with creditable grains. Creditable grains include whole grains, enriched grains, bran (such as oat bran, wheat bran, corn bran, rice bran, and rye bran), and germ (such as wheat germ). Bran and germ credit the same as enriched grains.

Grain foods must be whole-grain rich (WGR) or enriched. Cooked and RTE breakfast cereals must be WGR, enriched, or fortified. For detailed guidance on the crediting requirements for the grains component, refer to the CSDE's *Guide to Meeting the Meal Pattern Requirements for CACFP Child Care Programs* and *Guide to Meeting the Meal Pattern Requirements for CACFP Adult Day Care Centers*.

The CACFP crediting and WGR requirements apply to all grain food served in CACFP meals and snacks, including commercial grain products, grain foods made from scratch by the CACFP facility, and grain foods prepared by vendors. CACFP facilities must maintain the appropriate documentation to demonstrate that grain products and recipes meet the CACFP crediting and WGR requirements. The CSDE will review this information during the Administrative Review of the CACFP.

Note: The WGR requirement does not apply to the CACFP infant meal patterns for birth through 11 months.

1 Overview of Grain Requirements

Grain-based Desserts Do Not Credit

Grain-based desserts do not credit as the grains component in the CACFP meal patterns, even if they are WGR. Examples of grain-based desserts include breakfast bars, brownies, cakes (including cupcakes and coffee cakes), cereal bars, cinnamon rolls, cinnamon streusel quick breads, cookies (all kinds, including vanilla wafers), doughnuts, gingerbread, granola bars, ice cream cones, marshmallow cereal treats, pastries (such as cinnamon buns, Danish, sweet buns, sweet rolls, and eclairs) piecrusts in sweet pies (e.g., apple, coconut, blueberry, and pecan), sweet biscotti (such as those made with fruits, chocolate, or icing) sweet bread pudding, sweet croissants (e.g. chocolate filled), sweet scones (e.g., blueberry, raisin, and orange cranberry), rice pudding, and toaster pastries.

Grain-based desserts do not include sweet crackers (such as graham crackers and animal crackers), muffins, quick breads, e.g., banana bread and zucchini bread (except for cinnamon streusel), cornbread, pancakes, waffles, French toast, savory scones (such as cheese and herb), and piecrusts in entrees such as quiche, meat pies, and chicken potpie.

As a best practice, the USDA encourages CACFP menus to limit sweet crackers (such as graham crackers and animal crackers) because of their higher sugar content. The CSDE recommends not serving sweet crackers more than twice per week between all meals and snacks served in the CACFP.

For more information on grain-based desserts, refer to USDA Memo CACFP 16-2017: *Grain-Based Desserts in the Child and Adult Care Food Program* and visit the USDA's webpage, Grain-based Desserts in the CACFP.



Required Servings

Table 1-1 summarizes the meal pattern requirements for each meal and snack. The CACFP meal patterns require the grains component at breakfast, lunch, and supper. The grains component may be offered as one of the two required snack components.

The required quantities for the grains component are in ounce equivalents (oz eq). The minimum amount that credits toward the grains component is ½ oz eq.

Table 1-1. Required oz eq for the grains component				
CACFP meal pattern	Ages 1-2	Ages 3-5	Ages 6-12 and Ages 13-18 ¹	Adult participants ²
Breakfast	½ oz eq	½ oz eq	1 oz eq	2 oz eq
Lunch and supper	½ oz eq	½ oz eq	1 oz eq	2 oz eq
Snack	½ oz eq	½ oz eq	1 oz eq	1 oz eq

¹ The group for ages 13-18 applies only to at-risk afterschool programs and emergency shelters.

Determining Oz Eq

The amount of a creditable grain food that provides 1 oz eq varies because different types of foods contain different amounts of creditable grains. For example, to credit as 1 oz eq of the grains component, a roll (group B) must weigh 28 grams (1 ounce), a corn muffin (group C) must weigh 34 grams (1.2 ounces), and a blueberry muffin (Group D) must weigh 55 grams (2 ounces).

The USDA allows two methods for determining the oz eq of a creditable grain product or recipe. CACFP facilities may use either method but must document how the crediting information was obtained. These methods are summarized below.

For detailed guidance on both methods, refer to the CSDE's resource, Calculation Methods for Grain Ounce Equivalents in the Child and Adult Care Food Program. For more information on oz eq, visit the "Determining Oz Eq" section of the CSDE's Crediting Foods in CACFP Child Care Programs webpage or Crediting Foods in CACFP Adult Day Care Centers webpage.

² These amounts apply to adult participants in CACFP adult day care centers.

1 Overview of Grain Requirements

Method 1: USDA's Exhibit A chart

Method 1 uses the USDA's chart, *Exhibit A: Grain Requirements for Child Nutrition Programs*, to determine the required weight (groups A-E) or volume (groups H-I) for the grain group where the product or recipe belongs. This method is used for commercial grain products and may also be used for recipes if the menu planner knows the weight (grams or ounces) of the prepared (cooked) serving. Some commercial grain products require method 2 and the CACFP facility must obtain a PFS (refer to *When Commercial Grain Products Require a Product Formulation Statement to Credit in the Child and Adult Care Food Program*).

The Exhibit A grain quantities are not the same for all Child Nutrition Programs because the meal patterns are different. The CSDE's resource, *Grain Ounce Equivalents for the CACFP*, indicates the Exhibit A oz eq that apply to the CACFP meal patterns. Groups F and G (grain-based desserts) are not included because grain-based desserts do not credit as the grains component in the CACFP.

For detailed guidance on determining the oz eq of a grain menu item, refer to the CSDE's resources, Calculation Methods for Grain Ounce Equivalents in the Child and Adult Care Food Program and How to Use the Grain Ounce Equivalents Chart for the CACFP.

Method 2: creditable grains

Method 2 determines oz eq from the weight (grams) of creditable grains per serving. This method is used for recipes and may also be used for commercial grain products with a PFS stating the weight of creditable grains per serving.

To credit as 1 oz eq of WGR grains, foods in groups A-E of the USDA's Exhibit A chart must contain 16 grams of creditable grains (including at least 8 grams of whole grains) and foods in groups H-I must contain 28 grams of creditable grains (including at least 14 grams of whole grains). The grams of whole grains must be listed in the commercial product's PFS or calculated from the grain quantities in the CACFP facility's recipe.

Grain crediting tools

The tools below help menu planners determine the oz eq contribution of creditable grain products and recipes.

- USDA's Exhibit A Grains Tool for commercial grain products: This online tool of the USDA's Food Buying Guide for Child Nutrition Programs (FBG) determines the oz eq of commercial grain products. For more information, watch the USDA's webinars, Exhibit A Grains Tool to the Rescue and How to Maximize the Exhibit A Grains Tool.
- **CSDE's CACFP crediting worksheets:** These Excel worksheets determine if grain products and recipes meet the CACFP crediting requirements and WGR criteria, and calculate the oz eq contribution of the serving.
 - o Adult Center Worksheet 1: Crediting Commercial Grains in the CACFP
 - Adult Center Worksheet 4: Crediting Family-size Recipes for Grains in the CACFP
 - Adult Center Worksheet 5: Crediting Quantity Recipes for Grains in the CACFP
 - Child Care Worksheet 1: Crediting Commercial Grains in the CACFP
 - Child Care Worksheet 4: Crediting Family-size Recipes for Grains in the CACFP
 - Child Care Worksheet 5: Crediting Quantity Recipes for Grains in the CACFP

The grain crediting worksheets for CACFP adult day care centers are available in the "Documents/Forms" section of the CSDE's Crediting Foods in CACFP Adult Day Care Centers webpage. The grain crediting worksheets for CACFP child care programs are available in the "Documents/Forms" section of the CSDE's Crediting Foods in CACFP Child Care Programs webpage.

- **CSDE's How to Use the Grain Ounce Equivalents Chart for the CACFP:** The CSDE's resource, How to Use the Grain Ounce Equivalents Chart for the Child and Adult Care Food Program, reviews the steps for using the Exhibit A quantities to determine the meal pattern contribution of three types of commercial grain products and recipes. These include grain menu items in groups A-E that contain multiple small pieces per serving (e.g., crackers, hard pretzels, and animal crackers), multiple large pieces per serving (e.g., pancakes, slices of bread, and waffles), and one piece per serving (e.g., muffins, bagels, and rolls).
- USDA's Recipe Analysis Workbook: The FBG's online Recipe Analysis Workbook allows menu planners to search for ingredients, develop a standardized recipe, and determine the recipe's meal pattern contribution per serving. To access this tool, users must create a free account on the USDA's FBG website.

For more information on oz eq, visit the "Determining Oz Eq" section of the CSDE's Crediting Foods in CACFP Child Care Programs webpage or Crediting Foods in CACFP Adult Day Care Centers webpage.

1 Overview of Grain Requirements

Whole Grain-rich (WGR) Requirement

The CACFP meal patterns for children and adult meal patterns require at least one serving of WGR foods per day, between all meals and snacks served in the CACFP facility. The USDA's CACFP best practices recommend at least two servings of WGR grains per day. CACFP facilities may serve a WGR food at any meal or snack. The WGR requirement does not apply to the CACFP infant meal patterns for birth through 11 months.

Overview of methods to evaluate foods for WGR compliance

CACFP facilities may use any of the methods below to determine if a grain food meets the WGR criteria.

- 1. **Rule of Three:** Commercial grain products are WGR if a whole grain is the first grain ingredient, and the next two grain ingredients (if any) are creditable.
- 2. Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)-approved whole-grain food list: Commercial grain products like bread, tortillas, pasta, and rice contain are WGR if they are listed on any state's WIC-approved whole grain food list.
- 3. Documentation: Commercial grain products and recipes for grain foods are WGR if the CACFP facility has documentation indicating that whole grains are the primary grain ingredient. Acceptable WGR documentation includes a Child Nutrition (CN) label or product formulation statement (PFS) for commercial grain foods and a recipe for foods made from scratch.
- 4. National School Lunch Program (NSLP) WGR Criteria: Commercial grain products and recipes for grain foods that meet the NSLP and the SBP WGR criteria meet the CACFP WGR criteria.
- 5. Food and Drug Administration (FDA) approved whole-grain health claims:

 Commercial grain products are WGR if they include one of the FDA-approved whole-grain health claims on their packaging.
- 6. **Labels for foods with FDA Standard of Identity:** Commercial whole-wheat products that have an FDA standard of identity are WGR.

Refer to section 3 for detailed guidance on each method.

Whole Grain versus WGR

All foods that are 100 percent grain are WGR, but not all WGR foods are 100 percent grain.

- A food is 100 percent whole grain if all grain ingredients are whole grains. Grain foods that are 100 percent whole grain meet the CACFP WGR criteria. Table 1 shows some examples of commercial products that are 100 percent whole-grain.
- A food is WGR if it contains at least 50 percent whole grains and any other grains are enriched, bran, or germ. WGR foods include foods that are 100 percent whole grain and foods that contain a blend of whole (at least 50 percent) and enriched grains.

Reviewing the Ingredients Statement

The ingredients for commercial products are listed in descending order of predominance by weight. The ingredient that weighs the most is listed first and the ingredient that weighs the least is listed last. When reviewing the first ingredient on the product's label, water is ignored.

When a whole grain is not listed first in the ingredients statement, whole grains might still be the primary ingredient by weight if:

- the product contains multiple whole-grain ingredients;
- and their combined weight is more than the weight of the other ingredients.

These products could meet the WGR criteria with proper manufacturer documentation. For more information, refer to "Documentation for Commercial WGR Products" in section 5.



1 Overview of Grain Requirements

Considerations for Reducing Choking Risks for Young Children

Children younger than 4 are at the highest risk of choking. Consider children's age and developmental readiness when deciding what types of WGR grain foods to offer in CACFP menus.

Examples of grain foods that are choking risks include hard pretzels; pretzel chips; corn chips; breakfast cereals that contain nuts, whole-grain kernels (such as wheat berries), and hard chunks (such as granola); and crackers or breads with seeds, nut pieces, or whole-grain kernels. For additional guidance, visit the "Choking Prevention" section of the CSDE's Food Safety for Child Nutrition Programs webpage.

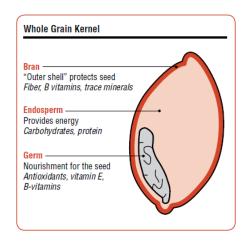
2 — Creditable Grains

Creditable grains are the ingredients in a grain product or recipe that contribute toward the grains component. They include whole grains, enriched grains, bran, and germ. This section contains guidance on how to identify each creditable grain.

Whole Grains

Whole grains consist of the entire cereal grain seed or kernel, after removing the inedible outer husk or hull. The kernel includes the starchy endosperm, the fiberrich bran, and the nutrient-rich germ.

Usually the grain kernel is cracked, crushed, flaked, or ground during the milling process. A finished grain product is considered whole grain if it contains the same relative amounts of bran, germ, and endosperm as the original grain. A commercial grain product is whole grain if it meets any of the criteria below.



Grain name states "whole"

A grain is whole grain if the word "whole" is listed before the grain ingredient. For example, "whole wheat flour" and "whole-grain corn" are whole grains, but "wheat flour" and "yellow corn" are not.

Other names for whole grains

Some whole grains do not contain the word "whole" in the grain name. Examples include berries (the whole kernels of grain) such as wheat berries and rye berries, groats (the hulled whole kernels of grain) such as oat groats, rolled oats and oatmeal (including old-fashioned, quick-cooking, and instant oatmeal), brown rice and wild rice, graham flour (a coarsely ground whole-wheat flour), and many other grains such as quinoa, millet, triticale, teff, amaranth, buckwheat, and sorghum.









2 Creditable Grains

Food and Drug Administration (FDA) standard of identity

Some whole-wheat products have an FDA standard of identity that indicates they are whole grain. A standard of identity is a set of rules for what a certain product, such as whole-wheat bread, must contain or may contain to be legally labeled with that product name. The FDA provides standards of identity only for certain whole-wheat products, including whole-wheat bread, rolls, and buns (21 CFR 136.180) and whole-wheat macaroni products (21 CFR 139.138). These products include:

- whole-wheat bread, rolls, and buns;
- entire wheat bread, rolls, and buns;
- graham bread, rolls, and buns (does not include graham crackers); and
- whole-wheat spaghetti, vermicelli, macaroni, and macaroni products.

Other grain products that are labeled as "whole wheat" but do not have an FDA standard of identity (such as crackers, tortillas, bagels, and biscuits) may or may not be 100 percent whole grain.

WIC-approved whole grain foods list

Grain products like bread, tortillas, pasta, and rice contain are whole grain if they are listed on any state's WIC-approved whole grain food list. WIC-listed breakfast cereals must be specifically marked as whole grain because not all WIC-listed breakfast cereals are whole grain. The Connecticut WIC food guides are available on the Connecticut State Department of Public Health's Approved Food Guide webpage.

Nixtamalized corn ingredients

Commercial corn products such as tortilla chips, taco shells, and tamales credit as whole grains if the product is labeled "whole grain," or the corn ingredient is nixtamalized (treated with lime). Nixtamalization is the process of soaking and cooked dried corn in an alkaline (slaked lime) solution. This process results in a product with a similar nutrition content to whole-grain corn.

Nixtamalized corn is used to make hominy, masa harina (corn flour), corn masa (dough from masa harina), and certain types of cornmeal. Masa is used for making tortilla chips, taco shells, tamales, pupusas, and other popular corn products. Hominy, corn masa, and masa harina credit as whole grains.



Dried hominy (such as grits) credits as a whole grain. A ½-cup serving of cooked hominy grits or 1 ounce (28 grams) of dry hominy grits credits as 1 oz eq of the grains component.

CACFP facilities may use either method below to determine if commercial grain products are made with nixtamalized corn.

To meet the WGR criteria, a food that meets one of the criteria below must also meet the limit for noncreditable grains (refer to "WGR Criterion 2 - Noncreditable Grains Meet Limit" in section 3).

- 1. The corn is treated with lime: A corn ingredient is nixtamalized if the ingredients statement indicates that the corn is treated with lime, e.g., "ground corn with trace of lime" and "ground corn treated with lime." The ingredients statements below show some examples of commercial nixtamalized corn products that credit as 100 percent whole grains.
 - Ingredients: Corn masa flour, water, contains 2% or less of: cellulose gum, guar gum, amylase, propionic acid, benzoic acid, and phosphoric acid (to maintain freshness).
 - Ingredients: Whole-white corn, vegetable oil (contains soybean, corn, cottonseed, and/or sunflower oil), salt, lime/calcium hydroxide (processing aid).
 - Ingredients: Limed whole-grain white corn, palm oil, salt, TBHQ (preservative).
 - Ingredients: Whole-grain yellow corn, canola oil, water, corn flour, salt, hydrated lime.

If the ingredients statement does not provide sufficient information (such as "cornmeal" and "yellow corn flour"), SFAs must obtain a PFS from the manufacturer stating that ingredients are whole grain, enriched, or nixtamalized. For information on PFS forms, refer to "Crediting Documentation for Commercial Whole-grain Products" in this document.

- 2. The product includes the FDA-approved whole grain health claim: A commercial product made with corn is at least 50 percent whole grain if it includes one of the two FDAapproved whole grain health claims on its packaging. These claims are not commonly found on most grain products.
 - Low-fat claim: "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."
 - Moderate-fat claim: "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."

Crediting information for corn masa, masa harina, corn flour, and cornmeal is summarized in USDA Memo SP 34-2019, CACFP 15-2019, and SFSP 15-2019: Crediting Coconut, Hominy, Corn Masa, and Masa Harina in the Child Nutrition Programs.

2 Creditable Grains

Reconstituted grains

Reconstituted grains (such as "reconstituted whole-wheat flour") credit as whole grains when the reconstitution is done by the original milling facility to ensure the same batch of whole grain is returned to its natural proportions. Reconstituted grains are made by blending the crushed and separated products of milling (bran, germ, and endosperm) from the same type of grain in the same proportions originally present in the intact grain kernel. To credit reconstituted grains as the grains component, CACFP facilities must request documentation stating that the milling company recombined the grain components to the natural proportions of bran, germ, and endosperm.

For more information on identifying and crediting whole grains, refer to the CSDE's resource, Crediting Whole Grains in the Child and Adult Care Food Program.

Enriched Grains

Enriched grains are refined grains (such as wheat, rice, and corn) and grain products (such as cereal, pasta, and bread) that have certain vitamins and minerals added to replace some of the nutrients lost during processing. The five enrichment nutrients are defined by the Food and Drug Administration (FDA) and include:

- thiamin (vitamin B₁, thiamin mononitrate, or thiamin hydrochloride);
- riboflavin (vitamin B₂); niacin (vitamin B₃ or niacinamide);
- folic acid (folate); and
- iron (reduced iron, ferrous sulfate, or ferric orthophosphate).

If a commercial grain product includes enriched ingredients or the product itself is enriched, the ingredients or product must meet the applicable FDA standard of identity for enrichment. For guidance on identifying and crediting enriched grains, refer to the CSDE's resource, *Crediting Enriched Grains in the Child and Adult Care Food Program*.

Bran and Germ

Bran (such as oat bran, wheat bran, corn bran, rice bran, and rye bran) is the seed husk or outer coating of cereal grains such as wheat, rye, and oats. Germ (such as wheat germ) is the vitamin-rich embryo of the grain kernel. Bran and germ credit the same as enriched grains.



3 — WGR Requirement for the CACFP

The CACFP meal patterns require at least one serving of WGR foods per day, between all meals and snacks served in the CACFP facility. The USDA's CACFP best practices recommend at least two servings of WGR grains per day. CACFP facilities may serve a WGR food at any meal or snack.

A food is WGR if it contains at least 50 percent whole grains and any other grains are enriched, bran, or germ. WGR foods include foods that are 100 percent whole grain and foods that contain a blend of whole (at least 50 percent) and enriched grains. To credit as a WGR food in the CACFP:

- commercial grain products (such as breads, crackers, pancakes, pasta, and cooked breakfast cereals) must contain a whole grain as the greatest ingredient by weight;
- commercial combination foods (such as pizza and breaded chicken nuggets) must contain a whole grain as the greatest ingredient by weight in the *grain portion*;
- RTE breakfast cereals must contain a whole grain as the first ingredient, be fortified, and
 cannot exceed 6 grams of sugar per dry ounce (refer to the CSDE's resource, Crediting
 Breakfast Cereals in the Child and Adult Care Food Program); and
- recipes must contain an amount of whole grains that is equal to or more than the combined amount of all other creditable grains.

All WGR foods credit in the CACFP meal patterns, but not all creditable grain foods are WGR.

If a commercial product or recipe meets the WGR criteria, CACFP facilities must determine the oz eq contribution of the serving. The serving must provide the required weight (groups A-E) or volume (groups H-I) for the applicable grain group in the USDA's Exhibit A chart or contain the minimum creditable grains. For more information, refer to "Ounce Equivalents" in section 1. For information on how to determine the oz eq contribution of a commercial product or recipe, refer to the CSDE's resource, Calculation Methods for Grain Ounce Equivalents in the Child and Adult Care Food Program.

3 WGR Requirement

WGR Criteria for Commercial Foods

Commercial grain products (such as breads, rolls, muffins, crackers, and waffles) are WGR if a whole grain is the greatest ingredient by weight. Commercial combination foods that contain a grain portion (such as pizza, breaded fish sticks, and lasagna) are WGR if a whole grain is the greatest ingredient by weight in the *grain portion*. The USDA allows six methods for determining if grain foods meet the CACFP WGR criteria. Refer to section 4 for a review of each method.

WGR Criteria for Foods Made from Scratch

Grain foods made from scratch are WGR if the amount of whole grains in the recipe is equal to or more than the combined amount of the other creditable grains in the recipe. For example, a recipe that contains 10 ounces of whole-grain flour and 8 ounces of enriched flour is WGR, and a recipe that contains 8 ounces of whole-grain flour and 8 ounces of enriched flour is WGR.

Combination foods made from scratch are WGR if the amount of whole grains in the *grain portion* of the recipe is equal to or more than the combined amount of the other creditable grains in the *grain portion* of the recipe. For example, a pizza recipe that contains a crust (grain portion) made with 2 cups of whole-grain flour and 2 cups of enriched flour is WGR.

Recipe measurements

The measurements of grain ingredients in a recipe may be listed by weight (e.g., pounds and ounces), volume (e.g., cups and quarts), or both. Menu planners may use either weight or volume when comparing the amount of grain ingredients in a recipe, but all grain ingredients must be in the **same** unit of measure. For example, a recipe could list all grain ingredients in ounces or all grain ingredients in cups but could not list some ingredients in ounces and others in cups.

If the recipe lists the grain ingredients as different units of measure, the CACFP facility must convert all amounts to the same unit before comparing the amount of whole grains with the amount of the other creditable grains. The USDA's resource, *Is My Recipe Whole Grain-Rich in the CACFP?*, provides guidance on these conversions.

Steps for determining if a recipe is WGR

Menu planners can determine if a recipe is WGR by using the three steps below.

- 1. Identify the whole-grain ingredients in the recipe. Add the amount of all whole grain ingredients together. Remember that all grain ingredients must be in the same unit of measure (weight or volume).
- 2. Identify all other creditable grain ingredients (enriched grains, bran, and germ) in the recipe. Add the amount of all other creditable grain ingredients together.
- 3. Compare the total amount of all whole grains with the total amount of all other creditable grains. If the amount of the whole-grain ingredients is equal to or more than the combined amount of enriched, bran, or germ ingredients, the recipe is WGR.

Table 3-1 shows some examples of how to determine if a recipe meets the WGR criteria.



Table 3-1. Determining if a recipe meets the CACFP WGR criteria

Example 1: Blueberry muffin		
In andianta		25 Servings
Ingredients	Weight	Measure
Whole-wheat flour	10 oz	2 ¹ / ₄ cups 1 Tbsp
Enriched all-purpose flour	7 oz	1 ¹ / ₃ cups
Sugar	8 oz	1 cup
Baking powder		1 Tbsp 2 tsp
Salt		1 tsp
Low-fat 1% milk		1½ cups
Fresh large eggs		3 each
Vegetable oil		² / ₃ cup
Frozen blueberries	6 oz	1½ cups

- 1. List the combined weight of all whole grains. 1
- A 10 ounces
- 2. List the combined weight of all other creditable grains. ¹
- B 7 ounces
- 3. Is A equal to or more than B? If "yes," the recipe is WGR.
- **☑** Yes ²
- □ No

Example 2: Corn muffin		
Ingradients	25 Servings	
Ingredients	Weight	Measure
Whole-wheat flour	8 oz	1 ½ cups
White whole-grain cornmeal	8 oz	1 ½ cups
Sugar	3 oz	⅓ cup 2 Tbsp
Baking powder		³ / ₄ tsp
Salt		3 qt ½ cup
Frozen whole eggs, thawed	3 oz	¹⁄₃ cup
Nonfat milk		1 ³ / ₄ cups
Canola oil		¹∕₄ cup

- 1. List the combined weight of all whole grains. ¹
- A 8 ounces
- 2. List the combined weight of all other creditable grains. ¹
- B 8 ounces
- 3. Is A equal to or more than B? If "yes," the recipe is WGR.
- ☑ Yes ² ☐ No

¹ For guidance on identifying whole and enriched grains, refer to the CSDE's resources, *Crediting Whole Grains in the Child and Adult Care Food Program* and *Crediting Enriched Grains in the Child and Adult Care Food Program*.

² The serving must provide the required weight (groups A-E) or volume (groups H-I) or contain the minimum creditable grains (refer to "Determining Oz Eq" in section 1).

Menu Planning Considerations for WGR Foods

CACFP facilities have the option to decide when to serve WGR foods if the menu includes at least one serving of WGR foods per day.

- If the CACFP facility serves only one CACFP meal per day (breakfast, lunch, or supper), the grains component served at that meal must be WGR.
- If the CACFP facility serves only breakfast and chooses to substitute meat/meat alternates (MMA) for the grains component (allowed up to three times per week), a WGR food is not required. For information on MMA substitutions at breakfast, visit the USDA's webpage, Serving Meat and Meat Alternates at Breakfast in the CACFP.
- If the CACFP facility (such as an at-risk afterschool program) serves only snack, the grains component is optional. Snack must include any two of the five components (milk, MMA, vegetables, fruits, and grains). However, if the CACFP facility serves only snack, and the snack menu includes the grains component (such as crackers with apples), the grain menu item must be WGR.
- If an at-risk afterschool program serves only one meal per day and chooses to implement offer versus serve (OVS), all grain menu items offered must be WGR. While OVS allows a variety of food items from one component, a CACFP facility that serves only one meal per day cannot offer a choice between a WGR grain and an enriched grain. This requirement is to ensure greater consumption of whole grains if a participant chooses to take a grain item. For more information on OVS, refer to the CSDE's resource, Offer versus Serve in At-Risk Afterschool Centers in the Child and Adult Care Food Program, and the USDA's resource, Offer Versus Serve in the CACFP.

Menu planning for different groups of participants at each meal

The WGR requirement applies to the CACFP, not to each participant. If a CACFP facility serves more than one meal, and two different groups of participants are at each meal (such as one group of children at breakfast and another group of children at lunch), only one meal is required to contain a WGR food.

However, the USDA strongly encourages CACFP facilities to vary the meal that includes a WGR item. For example, the CACFP menu could include whole-grain toast at breakfast on Monday and brown rice at lunch on Tuesday. This helps to ensure that all participants are served a variety of whole grains, and benefit from the important nutrients these foods provide.



4 — Methods to Identify WGR Foods

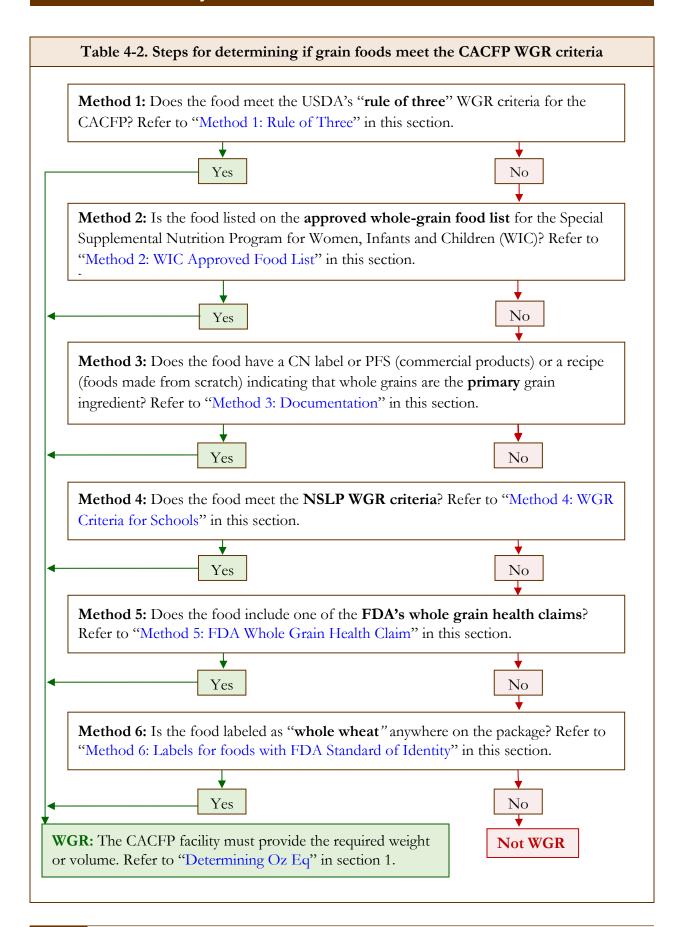
Table 4-1 summarizes the six methods that CACFP facilities may use to determine if grain foods meet the WGR criteria. A food is WGR if it meets any one of these methods.

If a commercial product is not WGR using one method, the menu planner should check to see if the product is WGR using another method. For example, a product that is not WGR using the Rule of Three (method 1) might be WGR based on the manufacturer's documentation provided in the PFS (method 3). All methods can be used for commercial grain products, but only methods 3 and 4 can be used for foods made from scratch.

Table 4-1. Methods to identify WGR foods for the CACFP		
	Applies to	
Method	Commercial products	Foods made from scratch
1. Rule of Three	✓	
2. WIC Whole-Grain Foods List	✓	
3. Documentation	✓	✓
4. National School Lunch Program (NSLP) WGR Criteria	√ 1	√ 1
5. Food and Drug Administration (FDA) Whole Grain Health Claim	✓	
6. Labels for foods with FDA Standard of Identity (whole wheat, entire wheat, or graham)	√	

¹ Method 4 is not common because most CACFP facilities are not affiliated with school nutrition programs.

Table 4-2 summarizes the steps for determining if grain foods are WGR. A description of each method follows. For additional resources, visit the USDA's webpages, Identifying Whole Grain-rich Foods for the CACFP and How to Spot Whole Grain-rich Foods for the CACFP.



Method 1: Rule of Three

A commercial food is WGR if it meets the USDA's Rule of Three WGR criteria for the CACFP. The Rule of Three reviews the product's ingredients statement and looks at the first three grain ingredients (refer to "Reviewing the Ingredients Statement" in section 1). The Rule of Three requirements apply to commercial grain products, commercial combination foods, and cooked breakfast cereals. These requirements are summarized below.

- Commercial grain products in groups A-E (such as breads, rolls, muffins, crackers, and pancakes) and group H (such as pasta and cereal grains, e.g., quinoa, rice, and millet) are WGR if a whole grain is the first ingredient (or water is the first ingredient and a whole grain is the next ingredient) and the next two grain ingredients (if any) are creditable. Table 4-4 summarizes the steps for determining if commercial grain products meet the Rule of Three.
- Commercial combination foods that contain a grain portion from groups A-E (such as pizza crust in pizza and breading for baked fish) or groups H-I (such as noodles in lasagna and baked chicken coated with crushed cereal flakes) are WGR if a whole grain is the first grain ingredient, and the next two grain ingredients (if any) are creditable. A commercial combination food that lists the ingredients for the grain portion separately is WGR if a whole grain is the first ingredient in the grain portion (or water is the first ingredient in the grain portion), and the next two grain ingredients in the grain portion (if any) area creditable. Table 4-5 summarizes the steps for determining if commercial combination foods meet the Rule of Three.
- Cooked breakfast cereals in group H (such as regular and instant oatmeal) are WGR if
 they meet three criteria: 1) the first ingredient is a whole grain; 2) the next two grain
 ingredients (if any) are creditable; and 3) total sugars do not exceed 6 grams per dry ounce.
 For more information, refer to the CSDE's resource, Crediting Breakfast Cereals in the Child and
 Adult Care Food Program.

The Rule of Three does not apply to RTE breakfast cereals in group I, such as puffed cereals, flaked or round cereals, and granola. For more information, refer to "WGR criteria for RTE breakfast cereals" in this section.

When reviewing a commercial product's ingredients statement for compliance with the Rule of Three criteria, the following requirements apply:

- a whole grain must be the first ingredient, and may be the second or third grain ingredients;
- an enriched grain may be the second or third grain ingredients;

4 Methods to Identify WGR Foods

- bran and germ may be the second or third grain ingredients; and
- noncreditable grains cannot be any of the first three grain ingredients.

If a food meets the Rule of Three, the menu planner does not need to check any other grain ingredients further down on the ingredients statement.

Noncreditable grains

Noncreditable grains are grain ingredients that do not contribute toward the grains component of the CACFP meal patterns. Examples include yellow corn flour, wheat flour, and semolina. Column A in table 4-3 lists common noncreditable grain ingredients found in commercial grain products.

When using the Rule of Three to determine if commercial grain products are WGR, menu planners must review the product's ingredients statement to identify any noncreditable grains. Noncreditable grains cannot be one of the first three grain ingredients for the Rule of Three.

Grain derivatives

Many grain products contain grain derivatives, which are by-products of grains. Some examples include malt made from barley, wheat gluten made from wheat, and maltodextrin made from corn. Column B in table 4-3 lists common grain derivatives found in commercial grain products.

Grain derivatives do not count as either creditable or noncreditable grains in the CACFP meal patterns. They are ignored for the Rule of Three.









Table 4-3. Examples of noncreditable grains for the Rule of Three ¹			
Column A: Noncreditable grains Count toward Rule of Three ²		Column B: Grain derivatives Ignore for Rule of Three	
Barley malt Bleached flour Bromated flour Coconut flour Corn Corn fiber Corn flour Cornmeal Degermed corn Degerminated corn meal Durum flour Farina Fermented wheat Fermented wheat flour Grits, e.g., barley grits, corn grits, and durum grits Malted barley flour Milled corn Nut or seed flours, e.g., almond flour, flaxseed meal, hazelnut meal, and sunflower seed flour Oat fiber Oat hull fiber Potato flour	Rye flour Semolina Semolina flour Soluble corn fiber Soy products, e.g., soy fiber, soy flakes and soy grits Stone-ground corn Stone-ground corn flour Vegetable and legume flours, e.g., chickpea flour, fava bean flour, pea flour, potato flour, and soy flour Wheat flakes Wheat flour White flour Yellow corn flour Yellow corn meal	Cellulose fiber Chicory extract Chicory root Citrus fiber Corn dextrin Cornstarch Cultured wheat starch Fibersol Gluten, e.g., wheat gluten, vital wheat gluten Hydrolyzed starch Inulin Malt and malt powder Maltodextrin, Modified cornstarch Modified food starch Modified rice starch Modified tapioca starch Modified wheat starch Pea fiber Potato starch Powdered cellulose Rice starch Short chain fructan (fiber) Soy flours, soy concentrates, and soy isolates Tapioca starch	
flaxseed meal, hazelnut meal, and sunflower seed flour Oat fiber Oat hull fiber		Powdered cellulose Rice starch Short chain fructan (fiber) Soy flours, soy concentrates, and soy isolates	

¹ This list is not all-inclusive.

² Noncreditable grains cannot be one of the first three grain ingredients for the Rule of Three.

4 Methods to Identify WGR Foods

When to ignore noncreditable grains

There are some situations when noncreditable grains do not count toward the Rule of Three. Noncreditable grains can be ignored when any of the situations below apply.

- 1. The ingredients statement lists one or more noncreditable grain after the statement, "contains 2% or less." Any noncreditable grains listed in the product's ingredients after the statement "contains 2% or less" are ignored for the Rule of Three. For example, if the product's ingredients list states "contains less than 2% of wheat flour and corn flour," the menu planner can ignore the wheat flour and corn flour (noncreditable grains).
- 2. The noncreditable grain is part of a dough conditioner. A dough conditioner is any ingredient added to improve the production and consistency of dough. Dough conditioners are found in many commercial products. Noncreditable grains listed in the sublisting for a dough conditioner are ignored for the Rule of Three. For example, if the ingredients statement lists "dough conditioner (*wheat flour*, salt, soy oil, ascorbic acid)," the menu planner can ignore the wheat flour (noncreditable grain) in the dough conditioner.
- 3. The noncreditable grain is part of the non-grain portion of a commercial combination food. The Rule of Three applies only to the *grain portion* of a commercial combination product, such as the pizza crust in pizza, the breading on chicken nuggets, and the pasta in macaroni and cheese. It does not apply to noncreditable grains that are part of the *non-grain portion* of a combination food, such as the portion of MMA, vegetables, or fruits. These noncreditable grains can be ignored. For example, the menu planner can ignore modified food starch in the chicken portion of breaded chicken, wheat flour in the cheese filling of ravioli, and soy flour in the vegetable filling of an egg roll.
- 4. The noncreditable grain is part of a non-grain ingredient. The Rule of Three applies only to the grain ingredients in a commercial product. It does not apply to noncreditable grains that are part of a non-grain ingredient in the grain food. For example, if a bagel contains "molasses powder (molasses, *wheat starch*)," the menu planner can ignore the wheat starch (noncreditable grain) in the molasses powder.



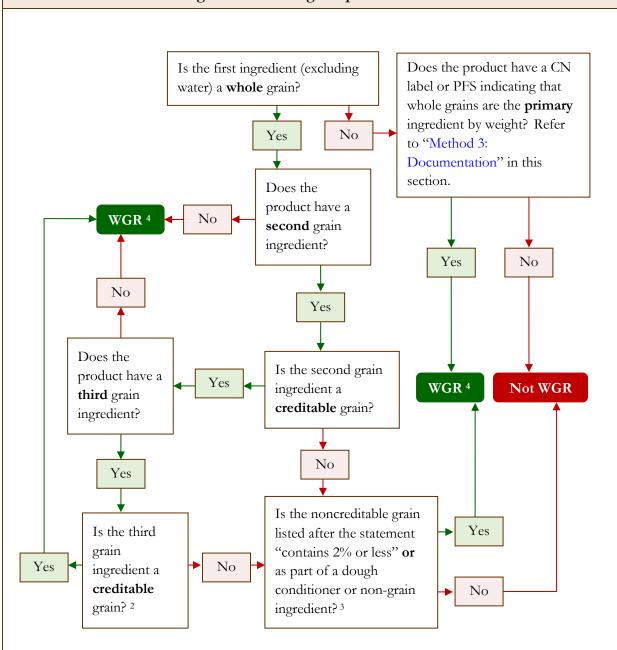


Table 4-4. Determining if commercial grain products meet the Rule of Three ¹

- ¹ These WGR criteria apply only to commercial grain products in groups A-E of the USDA's Exhibit A chart, such as breads, muffins, crackers, rice, pasta, and pancakes (refer to "Determining Oz Eq" in section 1).
- ² Creditable grains include whole grains, enriched grains, bran, and germ.
- ³ Ignore noncreditable grains listed after the statement "contains 2% or less" or in the sublisting for a dough conditioner or non-grain ingredient (refer to "Noncreditable grains" in this section). Ignore grain derivatives such as wheat gluten and modified food starch (refer to "Grain derivatives" in this section).
- ⁴ The serving must provide the required weight (groups A-E) or volume (groups H) in the USDA's Exhibit A chart or contain the minimum creditable grains (refer to "Determining Oz Eq" in section 1).

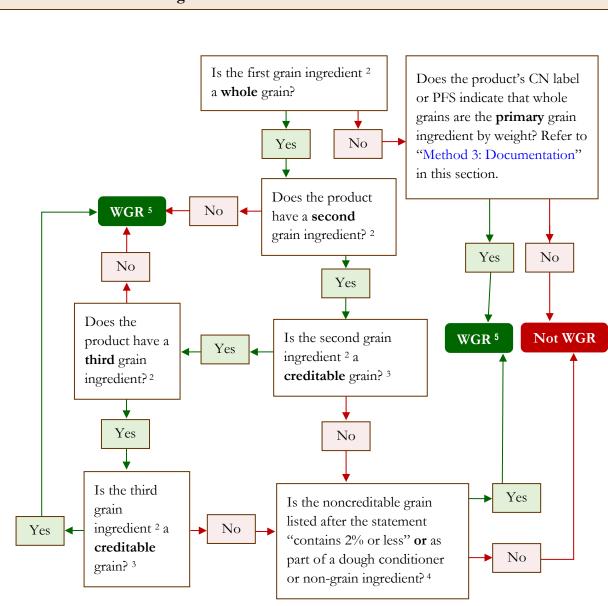


Table 4-5. Determining if commercial combination foods meet the Rule of Three ¹

- ¹ These WGR criteria apply only to commercial combination foods that contain a grain portion from groups A-E or H-I of the USDA's Exhibit A chart (refer to "Determining Oz Eq" in section 1).
- ² If the grain portion is listed separately, a whole grain must be the *first* ingredient in the grain portion (or water is the first ingredient and a whole grain is the next ingredient), and the *next two grain ingredients* in the grain portion (if any) must be creditable grains.
- ³ Creditable grains include whole grains, enriched grains, bran, and germ.
- ⁴ Ignore noncreditable grains listed after the statement "contains 2% or less" or in the sublisting for a dough conditioner or non-grain ingredient (refer to "Noncreditable grains" in this section). Ignore grain derivatives such as wheat gluten and modified food starch (refer to "Grain derivatives" in this section).
- ⁵ The serving must provide the required weight (groups A-E) or volume (groups H-I) or contain the minimum creditable grains (refer to "Determining Oz Eq" in section 1).

Method 2: WIC Approved Foods List

This method applies only to commercial products. Tortillas, pasta, rice, and bread are WGR if they are listed on the Approved Foods List for any state's WIC. WIC-listed breakfast cereals must be specifically marked as whole grain because not all WIC-listed breakfast cereals are whole grain. The Connecticut WIC food guides are available on the Connecticut State Department of Public Health's Approved Food Guide webpage. For more information, visit the USDA's webpage, Using the WIC Food Lists to Identify Grains for the CACFP.

Method 3: Documentation

This method applies to commercial products and foods made from scratch. Grain products and recipes are WGR if the CACFP facility has documentation indicating that whole grains are the primary grain ingredient. This documentation must be maintained on file for the Administrative Review of the CACFP.

Acceptable WGR documentation for commercial grain foods includes a CN label or PFS. Grain items are not eligible for a CN label unless they are part of main dish entrees that contain at least ½ oz eq of the MMA component. For more information, refer to "Documentation for Commercial WGR Grain Products" in section 4.

Foods made from scratch require a recipe that indicates the amount of each grain ingredient per serving. CACFP facilities must have recipes on file that document the crediting information for all grain foods made from scratch. The CSDE strongly recommends using standardized recipes to ensure accurate crediting information. For more information, refer to "Documentation for WGR Grain Foods Made from Scratch" in section 4.

Method 4: WGR Criteria for Schools

This method applies to commercial products and foods made from scratch. The WGR criteria for grades K-12 in the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) are stricter than the whole grain-rich criteria for the CACFP. Grain foods that meet the NSLP and the SBP WGR criteria will also meet the CACFP WGR criteria. This excludes WGR grain-based desserts, which credit in the school nutrition programs but do not credit in the CACFP.

Method 4 is not common since most CACFP facilities are not affiliated with school nutrition programs.

4 Methods to Identify WGR Foods

Method 5: FDA Whole Grain Health Claim

This method applies only to commercial products. A commercial grain product is WGR if the product packaging includes one of the FDA's two approved whole grain health claims.

- Low-fat claim: "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."
- Moderate-fat claim: "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."

The health claim on the package label must be identical to one of these statements. For consistency with the *Dietary Guidelines for Americans*, the USDA recommends choosing grain products with the FDA's low-fat health claim. These claims are not commonly found on most grain products.

Method 6: Labels for Foods with FDA Standard of Identity

This method applies only to commercial products. A commercial product is WGR if it is labeled as "whole wheat," "entire wheat," or "graham," and has an FDA standard of identify. A standard of identity is a set of rules for what a certain product (like whole-wheat bread) must contain or may contain to be legally labeled with that product name.

The FDA standards of identity are available only for certain types of breads and pasta. Table 4-6 lists these products. Only breads and pastas with these exact product names conform to an FDA standard of identity and meet the CACFP WGR criteria using this method.

Table 4-6. Bread and pasta products with a standard of identity ¹	
Breads (21 CFR 136.180)	Pasta (21 CFR 139.138)
 Entire wheat bread Entire wheat buns Entire wheat rolls Graham bread² Graham buns² Graham rolls² Whole wheat bread Whole wheat buns Whole wheat rolls 	 Whole wheat macaroni Whole wheat macaroni product Whole wheat spaghetti Whole wheat vermicelli

Only breads and pastas with these exact product names have an FDA standard of identity and meet the CACFP WGR criteria using this method.

² This does not include graham crackers.

Label information that does not indicate a food is WGR

Menu planners cannot use any of the following information to determine if a commercial grain product contains whole grains: products that are labeled "whole grain" or "whole wheat" but do not have an FDA standard of identity; products that include the Whole Grain Stamp; and products that are labeled with certain terms but that do not have an FDA standard of identity.

- Products with "whole grain" or "whole wheat" on the label: Except for certain types of breads and pasta with an FDA standard of identify (refer to table 4-6), any other foods labeled "whole grain" or "whole wheat" (such as crackers, tortillas, bagels, waffles, and biscuits) might not be WGR. For example, a package that states "whole-wheat waffles" or "whole-wheat bagels" may or may not be WGR.
- Whole Grain Stamps: The Whole Grain Council has three Whole Grain Stamps that manufacturers may choose to use on food packages. These stamps provide a visual marker to indicate products that contain significant amounts of whole grains. While these stamps provide useful information on the amount of whole grains a product contains, they are not sufficient documentation to determine if a food meets the CACFP WGR criteria. Products that display a Whole Grain Stamp may also contain high amounts of noncreditable grains, such as refined flour that is not enriched.



• Certain labeling terms for foods without FDA Standard of Identity: Manufacturers often label their products with terms that may be similar, but not identical, to the FDA's standard of identity terms. Some frequently used terms include "whole grain," "made with whole grains," "made with whole wheat," "contains whole grains," and "multi-grain" or specifying a certain number of grains, such as seven-grain bread. These terms do not indicate an FDA standard of identity for whole-wheat products. For more examples of misleading terms, refer to the CSDE's resource, Crediting Whole Grains in the Child and Adult Care Food Program.

CACFP facilities must use a different method to determine if these types of commercial grain products are WGR, such as the Rule of Three (method 1) or obtaining a PFS from the manufacturer (method 3).

WGR Criteria for RTE Breakfast Cereals

The Rule of Three does not apply to RTE breakfast cereals in group I, such as puffed cereals, flaked or round cereals, and granola. RTE breakfast cereals are WGR if they meet two criteria: 1) the first ingredient is a whole grain and the cereal is fortified, or the cereal is 100 percent whole grain; and 2) total sugars do not exceed 6 grams per dry ounce. For more information, refer to the CSDE's resource, *Crediting Breakfast Cereals in the Child and Adult Care Food Program*.



5 — WGR Documentation

CACFP facilities must be able to document the meal pattern contribution of all commercial grain products and recipes served in reimbursable meals and snacks. Menu planners should use the USDA's *Food Buying Guide for Child Nutrition Programs* (FBG) to determine food yields and crediting information for grain menu items.

Documentation for Commercial WGR Products

Crediting documentation (method 3) is required when a CACFP facility cannot determine if a commercial grain product is WGR using any of the other WGR methods (refer to methods 1-2 and 4-6 in section 3). The USDA allows two types of documentation for commercial processed foods, including CN labels and PFS forms.

CN labels

CN labels clearly identify the meal pattern contribution of commercial products, based on the USDA's evaluation of the product's formulation. Acceptable documentation includes the original CN label from the product carton, or a photocopy or photograph of the CN label shown attached to the original product carton.

CN labels are available only for main dish entrees that provide at least ½ oz eq of the MMA component, such as pizza, breaded chicken nuggets, and cheese ravioli. Grain products (such as breads, muffins, pancakes, crackers, and breakfast cereals) are not eligible for CN labels. However, CN-labeled foods usually indicate the meal pattern contribution of grains, vegetables, and fruits that are part of these products. For more information, refer to the CSDE's resource, *Using Child Nutrition (CN) Labels in the Child and Adult Care Food Program.*

PFS forms

A PFS is a document developed by manufacturers that provides specific information about how a product credits toward the USDA meal patterns for Child Nutrition Programs. The information on PFS forms can vary among manufacturers because these forms are not reviewed or monitored by the USDA.

To document that a product is WGR, the PFS must indicate the weight (grams) of each creditable grain per serving and demonstrate that whole grains are the greatest ingredient by weight. For more information on PFS forms, refer to the CSDE's resources, *Using Product Formulation Statements in the Child and Adult Care Food Program* and *When Commercial Grain Products Require a Product Formulation Statement to Credit in the Child and Adult Care Food Program*, and the USDA's document, *Product Formulation Statement for Documenting Grains in Child Nutrition Programs*.

When a PFS is Required for Commercial WGR Grain Products

CACFP facilities may need to obtain additional information to determine if some commercial grain products are WGR. A PFS is required for commercial products when any of the situations below apply.

- 1. The first ingredient is not a whole grain, but the product contains more than one whole grain. The PFS must indicate that the combined weight of all whole grains is the greatest ingredient by weight.
- 2. The first ingredient is a whole grain, and the product contains two or more enriched grains. The PFS must indicate that the weight of the whole grain is equal to more than the combined weight of the enriched grains.
- 3. The first ingredient is a flour blend of whole and enriched flour. The PFS must indicate one of the following: the whole grain content is at least 8 grams per oz eq (groups A-G); or the weight of the whole grain in the flour blend is more than the first ingredient (excluding water) listed after the flour blend.
- 4. A commercial combination food that contains a grain portion is not CN labeled. The PFS must indicate that creditable grains are the greatest ingredient by weight in the grain portion.
- 5. The manufacturer claims that the product's serving size is less than the required weight or volume in the USDA's Exhibit A chart. The PFS must indicate the grams of each creditable grain per serving and how the product provides that amount according to the FBG or USDA's regulations, guidance, or policies.
- 6. The product is not listed in the Exhibit A chart. The PFS must indicate the grams of each creditable grain per serving and how the product provides that amount according to the FBG or USDA's regulations, guidance, or policies.

For specific guidance and examples of each situation, refer to the CSDE's resource, When Commercial Grain Products Require a Product Formulation Statement to Credit in the Child and Adult Care Food Program.

An example of how to evaluate a grain PFS is available in section 6.

If the manufacturer will not supply a PFS or the PFS does not provide the appropriate documentation, the product cannot credit as the grains component in the CACFP meal patterns.

CACFP facilities must verify the PFS for accuracy before including the commercial grain product in reimbursable meals and must maintain this crediting documentation on file. The CSDE will review this information during the Administrative Review of the CACFP.

Documentation for WGR Foods Made from Scratch

CACFP facilities must have recipes on file that document the crediting information for all grain foods made from scratch. This includes foods made on site by the CACFP facility and all foods made from scratch that are purchased by the CACFP facility through a contract with a food service vendor or food service management company.

CACFP facilities must ensure that the crediting and WGR information for recipes is accurate. The CSDE will review this information during the Administrative Review of the CACFP. For information on how to determine if grain recipes are WGR, refer to "WGR Criteria for Foods Made from Scratch" in section 2.

The CSDE strongly recommends using standardized recipes to ensure accurate crediting information. The USDA defines a standardized recipe as one that has been tried, adapted, and retried several times for use by a given foodservice operation; and has been found to produce the same good results and yield every time when the exact procedures are used with the same type of equipment, and the same quantity and quality of ingredients.

For more information on standardized recipes, refer to section 2 of the CSDE's *Guide to Meeting the Meal Pattern Requirements for CACFP Child Care Programs* or *Guide to Meeting the Meal Pattern Requirements for CACFP Adult Day Care Centers*, and visit the "Standardized Recipes" section of the CSDE's Crediting Foods in CACFP Child Care Programs or Crediting Foods in CACFP Adult Day Care Centers webpage.



6 — How to Use the Rule of Three

This section contains examples of how to use the Rule of Three to determine if commercial grain products are WGR. If a product meets the Rule of Three, the CACFP facility must determine the oz eq contribution of the serving (refer to "Determining Oz Eq" in section 1).

Coding of Ingredients in the Crediting Examples

The information below summarizes the coding used to identify the creditable and noncreditable grains in the ingredients statement for each example.

- Creditable grains: Creditable grains (whole, enriched, bran, and germ) are indicated in **bold** text. Whole grains are indicated in bold UPPERCASE text. For examples of whole and enriched grains, refer to the CSDE's resources, Crediting Whole Grains in the Child and Adult Care Food Program and Crediting Enriched Grains in the Child and Adult Care Food Program.
- Noncreditable grains: Noncreditable grains (such as wheat flour, rice flour, corn flour, and oat fiber) are indicated in *italicized* text. Menu planners must include noncreditable grains when using the USDA's Rule of Three, unless any of the following apply: 1) the noncreditable grain is listed after the statement "contains 2% or less; 2) the noncreditable grain is listed in the sublisting for a dough conditioner; 3) the noncreditable grain is part of the non-grain portion of a combination food, such as wheat flour in the cheese filling of ravioli; or 4) the noncreditable grain is part of a non-grain ingredient, such as the wheat starch in a dough conditioner. For examples of noncreditable grains, refer to column A in table 4-3.
- Grain derivatives: Grain derivatives (by-products of grains such as wheat gluten and maltodextrin) are indicated in strikethrough text. These ingredients do not count toward the Rule of Three and are ignored. For examples of grain derivatives, refer to column B in table 4-3.
- Non-grain ingredients: Non-grain ingredients that contain noncreditable grains (such as dough conditioners, fillings, and flavors) are indicated in blue highlighted text. Examples include cheese filling that contains wheat starch, fruit filling that contains modified food starch, molasses powder that contains wheat starch, and dough conditioner that contains soy flakes. For more information, refer to "When to ignore noncreditable grains" in section 3.

Table 6-1 includes definitions for some common ingredients found in the commercial grain products used for the crediting examples. For additional definitions, refer to the glossary.

Table 6-1. Definitions for common ingredients in commercial grain products

azodicarbonamide (ADA): A chemical substance approved by the FDA for use as a whitening agent in cereal flour and a dough conditioner in bread baking.

bleached flour: Flour treated with chemical agents to speed up the natural aging process and produce a whiter flour with a finer grain and softer texture. Bleached flour is a creditable grain if it is enriched. For information on crediting enriched grains, refer to the CSDE's resource, *Crediting Enriched Grains in the Child and Adult Care Food Program.*

bromated flour: A type of flour with added potassium bromate, which promotes gluten development to improve dough's baking qualities (such as the rise and elasticity of dough). This flour is more commonly available with ascorbic acid added to provide the elasticity instead of potassium bromate. For information on crediting enriched grains, refer to the CSDE's resource, *Crediting Enriched Grains in the Child and Adult Care Food Program*.

DATEM or datem: An abbreviation for "diacetyl tartaric acid ester of mono- and diglycerides," which is an emulsifier used in baking. DATEM strengthens the gluten network in dough to improve the bread's texture and shape.

1-cysteine: An amino acid used in baking to help soften the dough and reduce processing time.

maltodextrin: A carbohydrate derived from starch (typically from corn, potatoes, rice, or wheat) that is used as a food additive to enhance texture and flavor. Maltodextrin is a grain derivative that does not count toward the Rule of Three.

modified food starch: A chemically altered ingredient made from starch that is used as a thickening agent, stabilizer, or emulsifier. The most common types of modified food starch are made from corn, wheat, potato, and tapioca. Modified food starch is a grain derivative that does not count toward the Rule of Three.

vital wheat gluten: A powdered form of wheat gluten that is used in baking to add elasticity to flours that are low in gluten, such as whole wheat or rye. Vital wheat gluten is a grain derivative that does not count toward the Rule of Three.

wheat gluten: The protein component of the wheat grain that helps baked goods hold their shape. Wheat gluten is a grain derivative that does not count toward the Rule of Three.

whey: A milk protein used to emulsify, thicken, and brown baked goods.

Product 1: Whole-wheat bagel (group B)

Ingredients: WHOLE-WHEAT FLOUR, sugar, wheat gluten. Contains 2% or less of each of the following: honey, salt, yellow corn flour, yeast, molasses, diacetyl tartaric acid esters of monodiglycerides (datem), ascorbic acid, mono-and diglycerides, l-cysteine, enzymes.

Part 1: Grain ingredients
A. First ingredient (excluding water): Whole-wheat flour
B. Second grain ingredient: None. Wheat gluten is a grain derivative and is ignored. ¹
C. Third grain ingredient: None. Yellow corn flour (noncreditable grain) is ignored because it is listed after "contains 2% or less." ¹
Part 2: CACFP crediting criteria for groups A-E
Crediting: The first ingredient (excluding water) is a creditable grain, i.e., whole, enriched, bran, or germ.
Is the first ingredient a creditable grain (refer to Part 1A)?
☑ Yes: creditable ² ☐ No: Does product contain more than one creditable grain?
☐ Yes: requires PFS ³ ☐ No: not creditable
Part 3: CACFP WGR criteria (Rule of Three) for groups A-E
WGR: The first ingredient (excluding water) is a whole grain and the next two grain ingredients (if any) are creditable.
1. Is the first ingredient a whole grain (refer to Part 1A above)?
☑ Yes □ No
2. Is the second grain ingredient (if any) a creditable grain (refer to Part 1B above)?
☐ Yes ☐ No ☑ Not applicable (no second grain ingredient or can be ignored) ¹
3. Is the third grain ingredient (if any) a creditable grain (refer to Part 1C above)?
☐ Yes ☐ No ☑ Not applicable (no third grain ingredient or can be ignored) ¹
4. Is the answer "Yes" for question 1 and either "Yes" or "Not applicable" for questions 2 and 3?
☑ Yes: WGR ² ☐ No: Does product contain more than one whole grain or a flour blend?
☐ Yes: requires PFS ⁴ ☐ No: not WGR
¹ Refer to "Noncreditable grains" in section 3.
² The serving must provide the required weight for group B in the USDA's Exhibit A chart or contain the
minimum creditable grains (refer to "Determining Oz Eq" in section 1). 3 A PFS must document that the combined weight of all creditable grains is the greatest ingredient by weight.
4 Refer to "When a PFS is required for commercial grain products" in section 4.

6 How to Use the Rule of Three

Product 2: English muffin (group B)

Ingredients: Water, WHOLE-WHEAT FLOUR, enriched flour (wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid), yeast, wheat gluten, contains less than 2% of each of the following: soybean oil, sugar, salt, calcium propionate (preservative), fumaric acid, baking soda, monocalcium phosphate, calcium sulfate, ammonium sulfate.

Part 1: Grain ingredien	ts
A. First ingredient (ex	scluding water): Whole-wheat flour
B. Second grain ingre	dient: Enriched flour
C. Third grain ingred	ient: None. Wheat gluten is a grain derivative and is ignored. ¹
Part 2: CACFP crediting	g criteria for groups A-E
Crediting: The first ingred	lient (excluding water) is a creditable grain, i.e., whole, enriched, bran, or germ.
Is the first ingredient a cr	reditable grain (refer to Part 1A)?
☑ Yes: creditable ²	☐ No: Does product contain more than one creditable grain?
	☐ Yes: requires PFS ³ ☐ No: not creditable
Dout 2. CACED WCD o	witania (Dada of Thuas) for anounce A. E.
Part 5: CACFP WGR C	riteria (Rule of Three) for groups A-E
WGR: The first ingredient ((excluding water) is a whole grain and the next two grain ingredients (if any) are creditable.
1. Is the first ingredient	t a whole grain (refer to Part 1A above)?
☑ Yes □ No	
2. Is the second grain in	ngredient (if any) a creditable grain (refer to Part 1B above)?
☑ Yes □ No	☐ Not applicable (no second grain ingredient or can be ignored) ¹
3. Is the third grain ing	redient (if any) a creditable grain (refer to Part 1C above)?
□ Yes □ No	☑ Not applicable (no third grain ingredient or can be ignored) ¹
4. Is the answer "Yes"	for question 1 and either "Yes" or "Not applicable" for questions 2 and 3?
☑ Yes: WGR ²	☐ No: Does product contain more than one whole grain or a flour blend?
	☐ Yes: requires PFS ⁴ ☐ No: not WGR
minimum creditable gra 3 A PFS must document	e grains" in section 3. de the required weight for group B in the USDA's Exhibit A chart or contain the tins (refer to "Determining Oz Eq" in section 1). that the combined weight of all creditable grains is the greatest ingredient by weight. is required for commercial grain products" in section 4.

Product 3: Bread sticks (group A)

Ingredients: Water, WHOLE-WHEAT FLOUR, unbleached unbromated enriched wheat flour (wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, enzymes, folic acid), honey, yeast, salt, dough conditioners (mono & diglycerides, DATEM, ascorbic acid, enzymes), modified food starch, fava bean flour, flavor (natural flavor, modified vegetable gum, hydrolyzed starch, maltodextrin), malted barley flour, dextrose, rye flour.

Part 1: Grain ingredients
A. First ingredient (excluding water): Whole-wheat flour
B. Second grain ingredient: Unbleached unbromated enriched wheat flour
C. Third grain ingredient: Fava bean flour (noncreditable grain). Note: Modified food starch is ignored because it is a grain derivative. ¹ Grains listed after the first three grain ingredients are also ignored, i.e., malted barley flour and rye flour.
Part 2: CACFP crediting criteria for groups A-E
Crediting: The first ingredient (excluding water) is a creditable grain, i.e., whole, enriched, bran, or germ.
Is the first ingredient a creditable grain (refer to Part 1A)?
☑ Yes: creditable ² ☐ No: Does product contain more than one creditable grain?
☐ Yes: requires PFS ³ ☐ No: not creditable
Part 3: CACFP WGR criteria (Rule of Three) for groups A-E
WGR: The first ingredient (excluding water) is a whole grain and the next two grain ingredients (if any) are creditable.
1. Is the first ingredient a whole grain (refer to Part 1A above)? ☑ Yes □ No
2. Is the second grain ingredient (if any) a creditable grain (refer to Part 1B above)?
✓ Yes ☐ No ☐ Not applicable (no second grain ingredient or can be ignored) ¹
3. Is the third grain ingredient (if any) a creditable grain (refer to Part 1C above)?
☐ Yes ☐ No ☐ Not applicable (no third grain ingredient or can be ignored) ¹
4. Is the answer "Yes" for question 1 and either "Yes" or "Not applicable" for questions 2 and 3?
☐ Yes: WGR ² ☐ No: Does product contain more than one whole grain or a flour blend?
☐ Yes: requires PFS ⁴ ☑ No: not WGR
 Refer to "Noncreditable grains" in section 3. The serving must provide the required weight for group A in the USDA's Exhibit A chart or contain the minimum creditable grains (refer to "Determining Oz Eq" in section 1). A PFS must document that the combined weight of all creditable grains is the greatest ingredient by weight. Refer to "When a PFS is required for commercial grain products" in section 4.

6 How to Use the Rule of Three

Product 4: Oat bread (group B)

Ingredients: Water, unbleached enriched wheat flour [flour, malted barley flour, reduced iron, niacin, thiamin mononitrate (vitamin B1), riboflavin (vitamin B2), folic acid], water, WHOLE WHEAT FLOUR, WHOLE OATS, sugar, wheat gluten, yeast, soybean oil, salt, calcium propionate (preservative), monoglycerides, datem and/or sodium stearoyl lactylate, calcium sulfate, citric acid, calcium carbonate, soy lecithin, whey, nonfat milk.

Da	et 1. Capia in capalicato
Pa	rt 1: Grain ingredients
Α.	First ingredient (excluding water): Unbleached enriched wheat flour
В.	Second grain ingredient: Whole-wheat flour
C.	Third grain ingredient: Whole oats
Pa	rt 2: CACFP crediting criteria for groups A-E
Cr	editing: The first ingredient (excluding water) is a creditable grain, i.e., whole, enriched, bran, or germ.
Is t	the first ingredient a creditable grain (refer to Part 1A)?
	☑ Yes: creditable ² ☐ No: Does product contain more than one creditable grain?
	☐ Yes: requires PFS ³ ☐ No: not creditable
Pa	rt 3: CACFP WGR criteria (Rule of Three) for groups A-E
W	GR: The first ingredient (excluding water) is a whole grain and the next two grain ingredients (if any) are creditable.
1.	Is the first ingredient a whole grain (refer to Part 1A above)?
	☐ Yes ☑ No
2.	Is the second grain ingredient (if any) a creditable grain (refer to Part 1B above)?
۵.	✓ Yes ☐ No ☐ Not applicable (no second grain ingredient or can be ignored) ¹
3.	Is the third grain ingredient (if any) a creditable grain (refer to Part 1C above)?
	✓ Yes □ No □ Not applicable (no third grain ingredient or can be ignored) ¹
4.	Is the answer "Yes" for question 1 and either "Yes" or "Not applicable" for questions 2 and 3?
	☐ Yes: WGR ² ☐ No: Does product contain more than one whole grain or a flour blend?
	✓ Yes: requires PFS ⁴ □ No: not WGR
Th	e PFS must indicate that the combined weight of the two whole grains is more than the enriched
flo	
	Refer to "Noncreditable grains" in section 3.
	The serving must provide the required weight for group B in the USDA's Exhibit A chart or contain the minimum creditable grains (refer to "Determining Oz Eq" in section 1).
	A PFS must document that the combined weight of all creditable grains is the greatest ingredient by weight.

⁴ Refer to "When a PFS is required for commercial grain products" in section 4.

Product 5: Blueberry muffin (group D)

Ingredients: WHOLE-WHEAT FLOUR, sugar, eggs, water, blueberries, enriched flour (flour, malted barley flour, niacin, reduced iron, thiamin mononitrate, riboflavin, folic acid), invert sugar, soybean oil, contains 2% or less of: palm oil, canola oil, propylene glycol mono- and diesters of fats and fatty acids, oat fiber, leavening (baking soda, sodium aluminum phosphate, monocalcium phosphate), modified food starch, salt, wheat starch, blueberry juice concentrate.

Part 1: Grain ingredients
A. First ingredient (excluding water): Whole-wheat flour
B. Second grain ingredient: Enriched flour
C. Third grain ingredient: None. The oat fiber (noncreditable grain) is ignored because it is listed after "contains 2% or less of." ¹
Part 2: CACFP crediting criteria for groups A-E
Crediting: The first ingredient (excluding water) is a creditable grain, i.e., whole, enriched, bran, or germ. Is the first ingredient a creditable grain (refer to Part 1A)?
☑ Yes: creditable ² ☐ No: Does product contain more than one creditable grain?
☐ Yes: requires PFS ³ ☐ No: not creditable
Part 3: CACFP WGR criteria (Rule of Three) for groups A-E
WGR: The first ingredient (excluding water) is a whole grain and the next two grain ingredients (if any) are creditable.
1. Is the first ingredient a whole grain (refer to Part 1A above)?
☑ Yes □ No
2. Is the second grain ingredient (if any) a creditable grain (refer to Part 1B above)?
☑ Yes ☐ No ☐ Not applicable (no second grain ingredient or can be ignored) ¹
3. Is the third grain ingredient (if any) a creditable grain (refer to Part 1C above)?
☐ Yes ☐ No ☑ Not applicable (no third grain ingredient or can be ignored) ¹
4. Is the answer "Yes" for question 1 and either "Yes" or "Not applicable" for questions 2 and 3?
☑ Yes: WGR ² ☐ No: Does product contain more than one whole grain or a flour blend?
☐ Yes: requires PFS ⁴ ☐ No: not WGR
 Refer to "Noncreditable grains" in section 3. The serving must provide the required weight for group D in the USDA's Exhibit A chart or contain the minimum creditable grains (refer to "Determining Oz Eq" in section 1). A PFS must document that the combined weight of all creditable grains is the greatest ingredient by weight. Refer to "When a PFS is required for commercial grain products" in section 4.

6 How to Use the Rule of Three

Product 6: Italian bread (group B)

Ingredients: Semolina flour, enriched durum wheat flour (durum wheat flour, ferrous sulfate, niacin, thiamine mononitrate, riboflavin, folic acid), WHOLE-WHEAT FLOUR, water, contains 2 percent or less of: sesame seeds, salt, malt syrup, eultured wheat starch, distilled vinegar, yeast, citric acid, malted barley flour.

Pa	rt 1: Grain ingredients
Α.	First ingredient (excluding water): Semolina flour (noncreditable grain)
В.	Second grain ingredient: Enriched durum wheat flour
C.	Third grain ingredient: Whole-wheat flour. Note: Grains listed after the first three grain
J.	ingredients are also ignored, i.e., malted barley flour.
Pa	rt 2: CACFP crediting criteria for groups A-E
Cr	editing: The first ingredient (excluding water) is a creditable grain, i.e., whole, enriched, bran, or germ.
Is t	he first ingredient a creditable grain (refer to Part 1A)?
	☐ Yes: creditable ² ☐ No: Does product contain more than one creditable grain?
	✓ Yes: requires PFS ³ ☐ No: not creditable
Pa	rt 3: CACFP WGR criteria (Rule of Three) for groups A-E
W	GR: The first ingredient (excluding water) is a whole grain and the next two grain ingredients (if any) are creditable.
1.	Is the first ingredient a whole grain (refer to Part 1A above)?
1.	☐ Yes ☐ No
2.	Is the second grain ingredient (if any) a creditable grain (refer to Part 1B above)?
	☑ Yes ☐ No ☐ Not applicable (no second grain ingredient or can be ignored) ¹
2	
3.	Is the third grain ingredient (if any) a creditable grain (refer to Part 1C above)?
	✓ Yes □ No □ Not applicable (no third grain ingredient or can be ignored) ¹
4.	Is the answer "Yes" for question 1 and either "Yes" or "Not applicable" for questions 2 and 3?
	☐ Yes: WGR ² ☐ No: Does product contain more than one whole grain or a flour blend?
	☐ Yes: requires PFS ⁴ ☑ No: not WGR
	1
1]	Refer to "Noncreditable grains" in section 3.
	The serving must provide the required weight for group B in the USDA's Exhibit A chart or contain the
	minimum creditable grains (refer to "Determining Oz Eq" in section 1). A PFS must document that the combined weight of all creditable grains is the greatest ingredient by weight.
	Refer to "When a PFS is required for commercial grain products" in section 4.

Product 7: Wheat roll (group B)

Ingredients: Water, flour blend [WHOLE-WHEAT FLOUR, enriched flour (wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, enzyme, folic acid)], water, brown sugar, corn oil, dough conditioner (soybean oil, vegetable glycerides, soy flakes), yeast, salt, wheat gluten, enzyme.

Part 1: Grain ingredients	
 A. First ingredient (excluding water): Flour blend (whole-wheat flour and enriched flour) B. Second grain ingredient: None. The soy flakes (noncreditable grain) are in the dough conditioner and are ignored. ¹ C. Third grain ingredient: None. Wheat gluten is a grain derivative and is ignored. ¹ 	
Part 2: CACFP crediting criteria for groups A-E	
Crediting: The first ingredient (excluding water) is a creditable grain, i.e., whole, enriched, bran, or germ.	
Is the first ingredient a creditable grain (refer to Part 1A)?	
☑ Yes: creditable ² ☐ No: Does product contain more than one creditable grain?	
☐ Yes: requires PFS ³ ☐ No: not creditable	
Part 3: CACFP WGR criteria (Rule of Three) for groups A-E	
WGR: The first ingredient (excluding water) is a whole grain and the next two grain ingredients (if any) are creditable.	
1. Is the first ingredient a whole grain (refer to Part 1A above)?☐ Yes ☑ No	
2. Is the second grain ingredient (if any) a creditable grain (refer to Part 1B above)?	
☐ Yes ☐ No ☑ Not applicable (no second grain ingredient or can be ignored) ¹	
3. Is the third grain ingredient (if any) a creditable grain (refer to Part 1C above)?	
☐ Yes ☐ No ☑ Not applicable (no third grain ingredient or can be ignored) ¹	
4. Is the answer "Yes" for question 1 and either "Yes" or "Not applicable" for questions 2 and 3?	
☐ Yes: WGR ² ☐ No: Does product contain more than one whole grain or a flour blend?	
✓ Yes: requires PFS ⁴ □ No: not WGR	
The PFS must indicate that the whole grain content is at least 8 grams per oz eq, or that the weight of the whole grain in the flour blend is more than the first ingredient after the flour blend.	
¹ Refer to "Noncreditable grains" in section 3.	
² The serving must provide the required weight for group B in the USDA's Exhibit A chart or contain the minimum creditable grains (refer to "Determining Oz Eq" in section 1).	
3 A PFS must document that the combined weight of all creditable grains is the greatest ingredient by weight.	

⁴ Refer to "When a PFS is required for commercial grain products" in section 4.

6 How to Use the Rule of Three

Product 8: Waffles made with whole wheat (commercial product in group C)

Ingredients: Water, enriched flour (wheat flour, niacin, reduced iron, vitamin B1 [thiamin mononitrate], vitamin B2 [riboflavin], folic acid), WHOLE-WHEAT FLOUR, canola oil, egg whites, wheat bran, sugar, contains 2% or less of leavening (baking soda, sodium aluminum phosphate, monocalcium phosphate), salt, malt flavoring, whey, soy lecithin.

Part 1: Grain ingredients
A. First ingredient (excluding water): Enriched flour
B. Second grain ingredient: Whole-wheat flour
C. Third grain ingredient: Wheat bran
Part 2: CACFP crediting criteria for groups A-E
Crediting: The first ingredient (excluding water) is a creditable grain, i.e., whole, enriched, bran, or germ.
Is the first ingredient a creditable grain (refer to Part 1A)?
✓ Yes: creditable ² ☐ No: Does product contain more than one creditable grain?
☐ Yes: requires PFS ³ ☐ No: not creditable
Part 3: CACFP WGR criteria (Rule of Three) for groups A-E
WGR: The first ingredient (excluding water) is a whole grain and the next two grain ingredients (if any) are creditable.
1. Is the first ingredient a whole grain (refer to Part 1A above)?
□ Yes ☑ No
2. Is the second grain ingredient (if any) a creditable grain (refer to Part 1B above)?
☑ Yes □ No □ Not applicable (no second grain ingredient or can be ignored) ¹
3. Is the third grain ingredient (if any) a creditable grain (refer to Part 1C above)?
☑ Yes □ No □ Not applicable (no third grain ingredient or can be ignored)¹
4. Is the answer "Yes" for question 1 and either "Yes" or "Not applicable" for questions 2 and 3?
☐ Yes: WGR ² ☐ No: Does product contain more than one whole grain or a flour blend?
☐ Yes: requires PFS ⁴ ☐ No: not WGR
¹ Refer to "Noncreditable grains" in section 3.
² The serving must provide the required weight for group C in the USDA's Exhibit A chart or contain the
minimum creditable grains (refer to "Determining Oz Eq" in section 1). 3 A PFS must document that the combined weight of all creditable grains is the greatest ingredient by weight.
⁴ Refer to "When a PFS is required for commercial grain products" in section 4.

Product 9: French toast (group E)

Ingredients: Bread (WHOLE-WHEAT FLOUR, water, enriched wheat flour [flour, malted barley flour, niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid], sugar, wheat gluten, yeast, salt, soybean oil, calcium propionate (preservative), DATEM, calcium sulfate, soy lecithin, water, batter (WHOLE-WHEAT FLOUR, sugar, enriched bleached wheat flour [enriched with niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid], dextrose, eggs, yellow corn flour, corn syrup solids, natural flavor, salt, leavening (sodium aluminum phosphate, sodium bicarbonate), nonfat milk, spice.

Par	t 1: Grain ingredients
Α.	First ingredient (excluding water): Whole-wheat flour in the bread
В.	Second grain ingredient: Enriched wheat flour in the bread
C.	Third grain ingredient: Whole-wheat flour in the batter. Note: Wheat gluten is ignored because it is a grain derivative. ¹ Grains listed after the first three grain ingredients are also ignored, i.e., yellow corn flour.
Par	t 2: CACFP crediting criteria for groups A-E
Cre	editing: The first ingredient (excluding water) is a creditable grain, i.e., whole, enriched, bran, or germ.
Is th	he first ingredient a creditable grain (refer to Part 1A)?
	☑ Yes: creditable ² ☐ No: Does product contain more than one creditable grain?
	☐ Yes: requires PFS ³ ☐ No: not creditable
Par	t 3: CACFP WGR criteria (Rule of Three) for groups A-E
WG	GR: The first ingredient (excluding water) is a whole grain and the next two grain ingredients (if any) are creditable.
1.	Is the first ingredient a whole grain (refer to Part 1A above)? ☑ Yes □ No
2.	Is the second grain ingredient (if any) a creditable grain (refer to Part 1B above)?
	\square Yes \square No \square Not applicable (no second grain ingredient or can be ignored) 1
3.	Is the third grain ingredient (if any) a creditable grain (refer to Part 1C above)?
	\square Yes \square No \square Not applicable (no third grain ingredient or can be ignored) \square
4.	Is the answer "Yes" for question 1 and either "Yes" or "Not applicable" for questions 2 and 3?
	☑ Yes: WGR ² ☐ No: Does product contain more than one whole grain or a flour blend?
	☐ Yes: requires PFS ⁴ ☐ No: not WGR
1 R	Refer to "Noncreditable grains" in section 3.
2 T	he serving must provide the required weight for group E in the USDA's Exhibit A chart or contain the
	ninimum creditable grains (refer to "Determining Oz Eq" in section 1). A PFS must document that the combined weight of all creditable grains is the greatest ingredient by weight.

⁴ Refer to "When a PFS is required for commercial grain products" in section 4.

6 How to Use the Rule of Three

Product 10: Breaded chicken nuggets (combination food with breading from group A)

Ingredients: Boneless, skinless chicken breast with rib meat, water, **WHOLE WHEAT FLOUR**, contains 2% or less of the following: dried garlic, dried onion, salt, sea salt, soybean oil, spice, sugar, torula yeast, turmeric, yeast, yeast extract. Breading set in vegetable oil.

Part 1: Grain ingredients
A. First grain ingredient: Whole-wheat flour
B. Second grain ingredient: None
C. Third grain ingredient: None
Part 2: CACFP crediting criteria for combination foods (not separate grain portion)
Crediting: The first ingredient (excluding water) is a creditable grain, i.e., whole, enriched, bran, or germ.
Is the first grain ingredient a creditable grain (refer to Part 1A)?
☑ Yes: creditable ² ☐ No: Does product contain more than one creditable grain?
☐ Yes: requires PFS ³ ☐ No: not creditable
Part 3: CACFP WGR criteria (Rule of Three) for combination foods (not separate grain portion)
WGR: The first grain ingredient in the grain portion is a whole grain and the next two grain ingredients (if any) are creditable.
 Is the first grain ingredient (excluding water) a whole grain (refer to Part 1A above)? ✓ Yes □ No
2. Is the second grain ingredient (if any) a creditable grain (refer to Part 1B above)?
☐ Yes ☐ No ☑ Not applicable (no second grain ingredient or can be ignored) ¹
3. Is the third grain ingredient (if any) a creditable grain (refer to Part 1C above)?
☐ Yes ☐ No ☑ Not applicable (no third grain ingredient or can be ignored) ¹
4. Is the answer "Yes" for question 1 and either "Yes" or "Not applicable" for questions 2 and 3?
☑ Yes: WGR ² ☐ No: Does product contain more than one whole grain or a flour blend?
☐ Yes: requires PFS ⁴ ☐ No: not WGR
 Refer to "Noncreditable grains" in section 3. The serving must provide the required weight for group A in the USDA's Exhibit A chart or contain the minimum creditable grains (refer to "Determining Oz Eq" in section 1). A PFS must document that the combined weight of all creditable grains is the greatest ingredient by weight. Refer to "When a PFS is required for commercial grain products" in section 4.

Product 11: Cheese ravioli (combination food with pasta from group H

Ingredients: Filling: Fat-free ricotta cheese (whey, skim milk, vinegar, carrageenan), water, egg, low-moisture part skim mozzarella cheese (cultured part skim milk, salt, enzymes), whey protein isolate, sodium caseinate, Romano cheese made from cow's milk (cultured milk, salt, enzymes), bleached wheat flour, salt, sugar, dehydrated garlic. Pasta: WHOLE-WHEAT FLOUR, enriched durum wheat flour (wheat flour, niacin, ferrous sulfate, thiamin mononitrate, riboflavin, folic acid), water, egg.

Part 1: Grain ingredients
 A. First grain ingredient in the grain portion: Whole-wheat flour B. Second grain ingredient in the grain portion: Enriched durum wheat flour C. Third grain ingredient in the grain portion: None
Part 2: CACFP crediting criteria for combination foods (separate grain portion)
Crediting: The first grain ingredient in the grain portion is a creditable grain, i.e., whole, enriched, bran, or germ.
Is the first grain ingredient a creditable grain (refer to Part 1A)?
☑ Yes: creditable ² ☐ No: Does product contain more than one creditable grain?
☐ Yes: requires PFS ³ ☐ No: not creditable
Part 3: CACFP WGR criteria (Rule of Three) for combination foods (separate grain portion)
WGR: The first grain ingredient in the grain portion is a whole grain and the next two grain ingredients (if any) are creditable.
 Is the first grain ingredient in the grain portion a whole grain (refer to Part 1A above)? ✓ Yes □ No
2. Is the second grain ingredient (if any) in the grain portion a creditable grain (refer to Part 1B above)? ☑ Yes ☐ No ☐ Not applicable (no second grain ingredient or can be ignored) ¹
3. Is the third grain ingredient (if any) in the grain portion a creditable grain (refer to Part 1C above)? ☐ Yes ☐ No ☑ Not applicable (no third grain ingredient or can be ignored)¹
4. Is the answer "Yes" for question 1 and either "Yes" or "Not applicable" for questions 2 and 3? ☑ Yes: WGR ² □ No: Does grain portion contain more than one whole grain or a flour blend? □ Yes: requires PFS ⁴ ☑ No: not WGR
 Refer to "Noncreditable grains" in section 3. The serving must provide the required weight or volume for group H in the USDA's Exhibit A chart or contain the minimum creditable grains (refer to "Determining Oz Eq" in section 1). A PFS must document that the combined weight of all creditable grains is the greatest ingredient by weight. Refer to "When a PFS is required for commercial grain products" in section 4.

Product 12: Breaded chicken patty (combination food with breading from group A)

Ingredients: Chicken, water, salt, and natural flavor. Breaded with: *Wheat flour*, water, wheat starch, WHITE WHOLE-WHEAT FLOUR, salt, *yellow corn flour*, corn starch, dried onion, dried garlic, dried yeast, brown sugar, extractives of paprika, and spices. Breading set in vegetable oil.

Part 1: Grain ingredients
 A. First grain ingredient in the grain portion:: Wheat flour (noncreditable grain) B. Second grain ingredient in the grain portion: White whole-wheat flour. Note: Wheat starch is ignored because it is a grain derivative. ¹ C. Third grain ingredient in the grain portion: Yellow corn flour (noncreditable grain)
Part 2: CACFP crediting criteria for combination foods (separate grain portion)
Crediting: The first grain ingredient in the grain portion is a creditable grain, i.e., whole, enriched, bran, or germ. Is the first grain ingredient a creditable grain (refer to Part 1A)? ☐ Yes: creditable ² ☑ No: Does product contain more than one creditable grain? ☐ Yes: requires PFS ³ ☑ No: not creditable
Part 3: CACFP WGR criteria (Rule of Three) for combination foods (separate grain portion)
 WGR: The first grain ingredient in the grain portion is a whole grain and the next two grain ingredients (if any) are creditable. 1. Is the first grain ingredient in the grain portion a whole grain (refer to Part 1A above)? □ Yes ☑ No
2. Is the second grain ingredient (if any) in the grain portion a creditable grain (refer to Part 1B above)? ☑ Yes ☐ No ☐ Not applicable (no second grain ingredient or can be ignored) ¹
3. Is the third grain ingredient (if any) in the grain portion a creditable grain (refer to Part 1C above)? ☐ Yes ☑ No ☐ Not applicable (no third grain ingredient or can be ignored) ¹
4. Is the answer "Yes" for question 1 and either "Yes" or "Not applicable" for questions 2 and 3? ☐ Yes: WGR ² ☑ No: Does grain portion contain more than one whole grain or a flour blend? ☐ Yes: requires PFS ⁴ ☑ No: not WGR
 Refer to "Noncreditable grains" in section 3. The serving of breading must provide the required weight for group A in the USDA's Exhibit A chart or contain the minimum creditable grains (refer to "Determining Oz Eq" in section 1). A PFS must document that the combined weight of all creditable grains is the greatest ingredient by weight. Refer to "When a PFS is required for commercial grain products" in section 4.

Product 13: Chicken vegetable egg roll (combination food with egg roll from group B)

Ingredients: Filling: Cabbage, ground chicken, carrots, celery, water, onion, contains 2% or less of: dried whole egg, sugar, soy sauce, modified food starch, dehydrated onions, salt, garlic, spice. Wrapper: WHITE WHOLE-WHEAT FLOUR, water, enriched flour (wheat flour [niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid]), enriched durum flour (wheat flour, niacin, ferrous sulfate, thiamine mononitrate, riboflavin, folic acid), contains 2% or less of: wheat gluten, soybean oil, salt, rice extract, cornstarch; water.

Part 1: Grain ingredients
A. First grain ingredient in the grain portion: White whole-wheat flourB. Second grain ingredient in the grain portion: Enriched flour
C. Third grain ingredient in the grain portion: Enriched durum flour
Part 2: CACFP crediting criteria for combination foods (separate grain portion)
Crediting: The first grain ingredient in the grain portion is a creditable grain, i.e., whole, enriched, bran, or germ. Is the first grain ingredient a creditable grain (refer to Part 1A)?
✓ Yes: creditable ² □ No: Does product contain more than one creditable grain? □ Yes: requires PFS ³ □ No: not creditable
Part 3: CACFP WGR criteria (Rule of Three) for combination foods (separate grain portion)
WGR: The first ingredient in the grain portion is a whole grain and the next two grain ingredients (if any) are creditable.
 Is the first grain ingredient in the grain portion a whole grain (refer to Part 1A above)? ✓ Yes □ No
 Is the second grain ingredient (if any) in the grain portion a creditable grain (refer to Part 1B above)? ✓ Yes □ No □ Not applicable (no second grain ingredient or can be ignored) ¹
3. Is the third grain ingredient (if any) in the grain portion a creditable grain (refer to Part 1C above)? ☑ Yes □ No □ Not applicable (no third grain ingredient or can be ignored)¹
4. Is the answer "Yes" for question 1 and either "Yes" or "Not applicable" for questions 2 and 3? ☑ Yes: WGR ² □ No: Does grain portion contain more than one whole grain or a flour blend? □ Yes: requires PFS ⁴ □ No: not WGR
 Refer to "Noncreditable grains" in section 3. The serving must provide the required weight for group B in the USDA's Exhibit A chart or contain the minimum creditable grains (refer to "Determining Oz Eq" in section 1). A PFS must document that the combined weight of all creditable grains is the greatest ingredient by weight. Refer to "When a PFS is required for commercial grain products" in section 4.



7 — How to Evaluate a Grain Product's PFS

The manufacturer's PFS provides information about how a processed grain product might contribute to the USDA's meal patterns for Child Nutrition Programs. The information on PFS forms can vary among manufacturers because these forms are not reviewed or monitored by the USDA. CACFP facilities are responsible for verifying the accuracy of the PFS and maintaining documentation records on file. This section provides guidance on how to evaluate PFS forms for commercial grain products.

CACFP facilities must check the accuracy of the crediting information on the manufacturer's PFS before including the grain product in reimbursable meals and snacks.

Parts of the USDA's PFS Form for Grains

The USDA's *Product Formulation Statement for Documenting Grains in Child Nutrition Programs* includes two PFS versions for documenting the crediting contribution of commercial grain products.

- Version 1 Crediting Standards Based on Grams of Creditable Grains (ounce equivalent): This version provides documentation based on the creditable grains per serving and is the most commonly required version. This PFS is required whenever the product's ingredients statement and packaging do not provide sufficient information to determine if the product meets the CACFP crediting or WGR criteria for the grains component. For more information, refer to "Method 2: creditable grains" in section 3 and "When a PFS is Required for Commercial WGR Products" in section 4.
- Version 2 Crediting Standards Based on Exhibit A Weights per Ounce Equivalent: This version provides documentation based on the minimum weight or volume for the applicable grain group in the USDA's Exhibit A chart. For more information, refer to "Method 1: USDA's Exhibit A chart" in section 3.

The USDA does not require manufacturers to use these forms. However, manufacturers that develop their own PFS forms must include all required information from the applicable USDA form.

Parts of the USDA's PFS Form for Grains

A PFS is an official certified document of the company. It must be on company letterhead and signed by a person of authority in the company, such as the quality control manager or the appropriate staff in nutrition or research and development. All PFS forms must include the five required elements below. The product's label with the ingredients statement must also be attached to the PFS.

- **Product name:** The product name stated on the PFS must match or have a similar description to the name on the product label.
- **Product code:** The product code number is a unique identifier assigned by the manufacturer. It may include numbers, letters, or a combination of both.
- **Serving size:** The serving size stated on the PFS should represent the amount of the product as purchased or ready for serving. It indicates the amount needed to provide the creditable amount stated on the PFS.
- **Creditable grain ingredients:** The PFS must list each creditable grain ingredient (whole grains, enriched grains, bran, and germ).
- Information to demonstrate how the creditable ingredients contribute toward the meal pattern: The PFS must indicate the information needed to calculate the crediting of each ingredient, including:
 - the Exhibit A grains group (A-I) for the product (refer to Method 1: USDA's Exhibit A chart in section 3; note: Groups F and G are grain-based desserts and do not credit as the grains component in the CACFP);
 - a description of each creditable grain ingredient (refer to section 2);
 - the grams of each creditable grain ingredient per portion;
 - the appropriate gram standard of creditable grains per serving (16 grams for groups A-e or 28 grams for groups H-I);
 - the creditable amount (oz eq) of each ingredient (divide grams of creditable grain ingredient by the appropriate gram standard);
 - the total weight (per portion) of the product as purchased; and
 - the total contribution (oz eq) of the product per portion.

CACFP facilities should determine if the manufacturer's PFS provides the information required to document that the product meets the crediting criteria for the grains component.

Table 7-1 shows a completed USDA PFS form, "Crediting Standards Based on Grams of Creditable Grains (ounce equivalent)," for a sample commercial grain product, Wheat Smile Pancakes.

Table 7-1. Sample PFS for grams of creditable grains



ABC Bread Company

Product Formulation Statement for Documenting Grains in Child Nutrition Programs

(Crediting Standards Based on Grams of Creditable Grains (ounce equivalent))

Program operators should include a copy of the label from the purchased product package in addition to the following information on letterhead signed by an official company representative. Program operators have the option to choose the crediting method that fits their specific menu planning needs.

-	rediting method that fits their specific menu planning needs.		1 1005		
			Code No.: <u>14005</u>		
Manufacturer:	ABC Bread Company		Serving Size: 2 pancakes, 50 grams (1.75 ounces)		
II. Does the pro		rich criteria? Yes X	No X How many gran	ns?	
(FBG) to deter cereals). (Differ the standard o	mine if the product fits into rent methodologies are app	Groups A-G (baked goods) died to calculate the grains of z eq; Groups H and I use the	n the Food Buying Guide for), Group H (cereal grains) or contribution based on credita e standard of 28g creditable	Group I (RTE breakfast able grains. Groups A-G u	
DESCRIP	TION OF CREDITABLE IIN INGREDIENT*	GRAMS OF CREDITABLE GRAIN INGREDIENT PER PORTION'	GRAM STANDARD OF CREDITABLE GRAINS PER OZ EQ (16g or 28g) ² B	CREDITABLE AMOUNT H A ÷ B	
Whole whea	t flour (30%)	15	16	0.9375	
Enriched floo	ur (22%)	11	16	0.6875	
				1.625	
			Total Creditable Amount	³ 1.5	
 1 (Serving size) 2 Standard gran 3 Total Credital Total weight (p 	ms of creditable grains from	rmula); serving sizes other the the corresponding Group ir d down to the nearest quart rchased 50g (1.75 oz)	an grams must be converted to n Exhibit A. eer (0.25) oz eq. Do not rounc		
I certify that the provides 1.5 more than 0.24	e above information is true a	and correct and that a $\frac{1.75}{1.00}$	ounce portion of this prairies are not above 0.24 ozend l of non-creditable grains	eq per portion. Products	
l certify that the provides 1.5 more than 0.24 grains requirer	e above information is true a oz eq grains. I further of toz eq or 3.99g for Groups a nent for school meals.	and correct and that a $\frac{1.75}{2}$ certify that non-creditable g A-G or 6.99g for Groups H $_{2}$	rains are not above 0.24 oz e	eq per portion. Products	
l certify that the provides 1.5 more than 0.24 grains requirer	e above information is true a oz eq grains. I further of toz eq or 3.99g for Groups a nent for school meals.	and correct and that a 1.75 certify that non-creditable g A-G or 6.99g for Groups Ha	rains are not above 0.24 oz e and I of non-creditable grains	eq per portion. Products	
I certify that the provides 1.5 more than 0.24	e above information is true a oz eq grains. I further of toz eq or 3.99g for Groups a nent for school meals.	and correct and that a 1.75 certify that non-creditable g A-G or 6.99g for Groups H a	rains are not above 0.24 oz e and I of non-creditable grains President itle	eq per portion. Products v	

Steps for Reviewing a PFS for Creditable Grains

The guidance below indicates what menu planners should review when determining if a PFS for creditable grains is accurate. The green circles refer to the applicable sections of the sample PFS for ABC Bread Company's Wheat Smile Pancakes in table 7-1.



Product information: Check that the product name, code number, manufacturer, and serving size on the PFS match the information on the product packaging.



Part I: "Does the product meet the whole grain-rich criteria"

If "Yes" is checked, review the information for noncreditable grains (C) in part II and the creditable grain ingredients (F) in part III. To be WGR, the total weight (grams) of the whole-grain ingredients (G) must be equal to or more than the weight of the enriched grain ingredients (G).

• For this example, the 15 grams of whole-wheat flour is more than the 11 grams of enriched flour.

If "No" is checked, products that contain creditable grains may credit as the grains component if the serving provides at least ½ oz eq (the minimum creditable amount).



Part II: "Does the product contain noncreditable grains" and "How many grams"

The CACFP Rule of Three states that noncreditable grains cannot be any of the first three grain ingredients. However, the CACFP WGR criteria do not require a specific limit for noncreditable grains.

Note: The limit for noncreditable grains applies only to the WGR criteria for the National School Lunch Program (NSLP) and School Breakfast Program (SBP). A product that meets the NSLP and SBP WGR criteria will also comply with the CACFP WGR criteria.



Part III: "Indicate which Exhibit A grain group (A-I) the product belongs"

Check that the PFS lists the correct Exhibit A grain group for the product (refer to the CSDE's resource, *Grain Ounce Equivalents for the Child and Adult Care Food Program*). For example, the PFS for bread must list group B and the PFS for pancakes must list group C.

• For this example, group C is the correct group for pancakes.



Part III chart, first column: "DESCRIPTION OF CREDITABLE GRAIN INGREDIENT"

Review the product's ingredients statement to identify all creditable grains (whole grains, enriched grains, bran, and germ). Check that the PFS lists the same creditable grains. For guidance on identifying creditable grains, refer to the CSDE's resources, Crediting Whole Grains in the Child and Adult Care Food Program and Crediting Enriched Grains in the Child and Adult Care Food Program.



Part III chart, second column: "GRAMS OF CREDITABLE GRAIN INGREDIENTS PER PORTION"

• For this example, the creditable grains include 15 grams of whole-wheat flour and 11 grams of enriched flour.



Part III chart, third column: "GRAM STANDARD OF CREDITABLE GRAIN PER OZ. EQUIVALENT (16g or 28g)"

Check that the PFS uses the correct gram standard for each creditable grain ingredient (F), based on the product's Exhibit A grain group listed above the chart (D).

- **Groups A-E (baked goods)** require 16 grams of creditable grains to credit as 1 oz eq. To credit as 1 oz eq of a WGR food, the 16 grams of creditable grains must include at least 8 grams of whole grains. **Note:** Groups F and G (grainbased desserts) do not credit as the grains component in the CACFP.
- **Group H (cereal grains)** requires 28 grams of creditable grains to credit as 1 oz eq. To credit as 1 oz eq of a WGR food, the 28 grams of creditable grains must include at least 14 grams of whole grains.
- **Group I (RTE breakfast cereals)** requires 28 grams (1 ounce) or the equivalent volume indicated in Exhibit A (1 cup for flaked and round cereals, 1½ cups for puffed cereals, and ½ cup for granola) to credit as 1 oz eq.



Part III chart, fourth column: "CREDITABLE AMOUNT"

Check that the calculation for the creditable amount of each creditable grain ingredient is correct. For each ingredient listed in column 1 (E), divide the "GRAMS OF CREDITABLE GRAIN INGREDIENT PER PORTION" in column 2 (F) by the "GRAM STANDARD OF CREDITABLE GRAIN PER OZ. EQUIVALENT" in column 3 (G).

• For this example, the calculations are correct: 15 grams of whole-wheat flour divided by 16 grams equals 0.9375 oz eq and 11 grams of enriched flour divided by 16 grams equals 0.6875 oz eq.



Part III chart, bottom of fourth column: "Total"

Check that the "Total" at the bottom of column 4 equals the sum of all creditable grain ingredients.

• For this example, the calculation is correct: 0.9375 oz eq of whole-wheat flour plus 0.6875 oz eq of enriched flour equals 1.625 oz eq.



Part III chart, bottom of fourth column: "Total Creditable Amount"

Check that the "Total Creditable Amount" at the bottom of column 4 is rounded **down** to the nearest quarter (1/4) serving. For example, 1.625 oz eq round down to 1.5 oz eq, 1.49 oz eq and 1.27 oz eq round down to 1.25 oz eq, and 1.24 oz eq round down to

1 oz eq.

• For this example, the rounding is correct: 1.625 oz eq rounds down to 1.5 oz eq.



"Total weight (per portion) of product as purchased" and "Total contribution of product (per portion)"

Check that the total weight per portion as purchased in this section is the same as the serving size listed at the top of the PFS (A). Check that the total contribution per portion (oz eq) in this section is the same as the "Total Creditable Amount" (K) listed at the bottom of column 4 in the chart in part III.

• For this example, the information is correct: The serving weight is listed as 1.75 ounces in both sections and the crediting contribution is listed as 1.5 oz eq in both sections.



Certification statement

Check that the portion size and oz eq contribution in the certification statement is the same as the information listed just above the certification statement (L).

• For this example, the information is correct: The serving weight is listed as 1.75 ounces in both sections and the crediting contribution is listed as 1.5 oz eq in both sections.



Signature

Check that the manufacturer's PFS is on company letterhead and is signed and dated by an official company representative. The signature may be handwritten, stamped, or electronic.

• For this example, the information is correct: The PFS is on company letterhead and is signed and dated by a company official.

CACFP facilities must maintain PFS forms and supporting information on file to document meal pattern compliance for auditing purposes. For more information, refer to "PFS forms" and "When a PFS is Required for Commercial WGR Grain Products" in section 4.

7 How to Evaluate a PFS

Common Compliance Issues for PFS Forms for Grain Products

The CSDE has observed several compliance issues with PFS forms for commercial grain products. The most common compliance issues include:

- incomplete or missing information; and
- incorrectly stating that the product does not contain noncreditable grains when they are listed on the ingredients statement.

PFS forms that do not provide sufficient information cannot be accepted as crediting documentation for CACFP meals and snacks. If the PFS is incomplete or inaccurate, the CACFP facility must request a revised PFS from the manufacturer, with supporting documentation, if needed.



8 — Resources

Breakfast Cereals

Bite Size: Meeting the CACFP Meal Patterns for Children: Module 7A: Grains Component Crediting Requirements (CSDE webinar):

https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-CACFP-Child-Care-Programs/Related-Resources#BiteSize

Calculating Sugar Limits for Breakfast Cereals in the CACFP (USDA handouts in English and Spanish):

https://www.fns.usda.gov/tn/calculating-sugar-limits-breakfast-cereals-cacfp

Choose Breakfast Cereals that are Lower in Sugar (USDA handouts, training slides, and webinars in English and Spanish):

https://www.fns.usda.gov/tn/choose-breakfast-cereals-are-lower-sugar

Crediting Breakfast Cereals in the Child and Adult Care Food Program (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/Credit_Cereals_CACFP.pdf

Crediting Documentation for Grains

Bite Size: Meeting the CACFP Meal Patterns for Children: Module 2: Meal Pattern Documentation (CSDE webinar):

https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-CACFP-Child-Care-Programs/Related-Resources#BiteSize

Accepting Processed Product Documentation in the Child and Adult Care Food Program (CSDE): https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/ Accepting_Processed_Product_Documentation_CACFP.pdf

Approved Food Guide for Connecticut WIC (Connecticut Department of Public Health): https://portal.ct.gov/DPH/WIC/Approved-Food-Guide

Food Buying Guide Section 4: Overview of Crediting Requirements for the Grains Component (USDA):

https://foodbuyingguide.fns.usda.gov/Content/TablesFBG/USDA_FBG_Section4_Grains.pdf

Food Buying Guide Section 4: Yield Table for Grains (USDA):

 $https://foodbuyingguide.fns.usda.gov/files/Reports/USDA_FBG_Section4_GrainsYield Table.pdf$

```
Grain Crediting Worksheets for CACFP Adult Day Care Centers (Worksheets 1-5)
   ("Documents/Forms" section of the CSDE's Crediting Foods in CACFP Adult Day Care
   Centers webpage):
   https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-CACFP-Child-Care-Programs/
   Documents#CreditingWorksheets
Grain Crediting Worksheets for CACFP Child Care Program (Worksheets 1-5)
   ("Documents/Forms" section of the CSDE's Crediting Foods in CACFP Child Care Programs
   webpage):
   https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-CACFP-Child-Care-
   Programs/Documents#CreditingWorksheets
Product Formulation Statement for Documenting Grains in Child Nutrition Programs
   (USDA):
   https://www.fns.usda.gov/sites/default/files/resource-files/
   PFS_Grains_Oz_Eq_Fillable_508.pdf
Product Formulation Statement for Documenting Grains in Child Nutrition Programs

    Completed Sample (USDA):

   https://www.fns.usda.gov/sites/default/files/resource-files/
   PFS_Example_Grains_Oz_Eq.pdf
Tips for Evaluating a Manufacturer's Product Formulation Statement (USDA):
   https://www.fns.usda.gov/sites/default/files/resource-files/manufacturerPFStipsheet.pdf
Using Child Nutrition (CN) Labels in the Child and Adult Care Food Program (CSDE):
   https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/
   Using_CN_labels_CACFP.pdf
Using Product Formulation Statements in the Child and Adult Care Food Program (CSDE):
   http://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/
   Using_Product_Formulation_Statements_CACFP.pdf
When Commercial Grain Products Require a Product Formulation Statement to Credit in the
   Child and Adult Care Food Program (CSDE):
   https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/
   When_Commercial_Grain_Products_Require_PFS_CACFP.pdf
```

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/Yield_Study_Form.pdf.

52

Yield Study Form for Child Nutrition Programs (CSDE):

Crediting Requirements for Grains

Bite Size: Meeting the CACFP Meal Patterns for Children: Module 7A: Grains Component Crediting Requirements (CSDE webinar)::

https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-CACFP-Child-Care-Programs/Related-Resources#BiteSize

Crediting Enriched Grains in the Child and Adult Care Food Program (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/Credit_Enriched_Grains_CACFP.pdf

Crediting Whole Grains in the Child and Adult Care Food Program (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/Credit_Whole_Grains_CACFP.pdf

Grain-based Desserts in the CACFP (USDA handouts and webinars in English and Spanish): https://www.fns.usda.gov/tn/grain-based-desserts-cacfp

Grains Component for CACFP Adult Day Care Centers (CSDE webpage):

https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-CACFP-Adult-Day-Care-Centers/Documents#Grains

Grains Component for CACFP Child Care Programs (CSDE webpage):

https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-CACFP-Child-Care-Programs/Documents#Grains

How to Identify Creditable Grains for the Child and Adult Care Food Program (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/Identify_Creditable_Grains_CACFP.pdf

USDA Memo CACFP 09-2018: Grain Requirements in the CACFP: Questions and Answers https://www.fns.usda.gov/cacfp/grain-requirements-cacfp-questions-and-answers

USDA Memo CACFP 16-2017: Grain-Based Desserts in the Child and Adult Care Food Program: https://www.fns.usda.gov/cacfp/grain-based-desserts-child-and-adult-care-food-program

USDA Memo SP 23-2019, CACFP 10-2019, and SFSP 9-2019: Crediting Popcorn in the Child Nutrition Programs:

https://www.fns.usda.gov/school-meals/crediting-popcorn-child-nutrition-programs

USDA Memo SP 34-2019, CACFP 15-2019, and SFSP 15-2019: Crediting Coconut, Hominy, Corn Masa, and Masa Harina in the Child Nutrition Programs:

https://www.fns.usda.gov/cn/crediting-coconut-hominy-corn-masa-and-masa-harina-child-nutrition-programs

Using the WIC Food Lists to Identify Grains for the CACFP (USDA handouts and webinars in English and Spanish):

https://www.fns.usda.gov/tn/using-wic-food-lists-identify-grains-cacfp

Crediting Grain Foods Made from Scratch

Documents#StandardizedRecipes

Bite Size: Meeting the CACFP Meal Patterns for Children: Module 7A: Grains Component Crediting Requirements (CSDE webinar):

https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-CACFP-Child-Care-Programs/Related-Resources#BiteSize

Crediting Foods Made from Scratch in CACFP Adult Day Care Centers (CSDE webpage): https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-CACFP-Adult-Day-Care-Centers/Documents#ScratchFoods

Crediting Foods Made from Scratch in Child Care Programs (CSDE webpage): https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-CACFP-Child-Care-Programs/Documents#ScratchFoods

Recipe Analysis Workbook (USDA's Food Buying Guide for Child Nutrition Programs): https://www.fns.usda.gov/tn/food-buying-guide-interactive-web-based-tool

Standardized Recipe Form for the Child and Adult Care Food Program (CSDE): https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/ Standardized_Recipe_Form_CACFP.docx

Standardized Recipes in CACFP Adult Day Care Centers (Documents/Forms section of the CSDE's Crediting Foods in CACFP Adult Day Care Centers webpage): https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-CACFP-Adult-Day-Care-Centers/Documents#StandardizedRecipes

Standardized Recipes in CACFP Child Care Programs (Documents/Forms section of the CSDE's Crediting Foods in CACFP Child Care Programs webpage): https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-CACFP-Child-Care-Programs/

Meal Patterns

```
Basics at a Glance Portion Control Poster (Institute of Child Nutrition):
   https://theicn.org/icn-resources-a-z/basics-at-a-glance/
Bite Size: Meeting the CACFP Meal Patterns for Children (CSDE webinars)
   https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-CACFP-Child-Care-Programs/Related-
   Resources#BiteSize
CACFP Meal Patterns for Adults (CSDE):
   https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/MealPattern/
   Adult_Meal_Pattern_CACFP.pdf
CACFP Meal Patterns for Children (CSDE):
   https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/MealPattern/
   CACFP_Meal_Pattern.pdf
CACFP Training Tools (USDA):
   https://www.fns.usda.gov/cacfp-training-tools
Guide to Meeting the Meal Pattern Requirements for CACFP Adult Day Care Centers (CSDE
   guide):
   https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/MealPattern/
   Guide_CACFP_Meal_Patterns_Adults.pdf
Guide to Meeting the Meal Pattern Requirements for CACFP Child Care Programs (CSDE guide):
   https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/MealPattern/
   Guide_CACFP_Meal_Patterns.pdf
Meal Patterns for CACFP Adult Day Care Centers (CSDE webpage):
   https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-CACFP-Adult-Centers
Meal Patterns for CACFP Child Care Programs (CSDE webpage):
   https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-CACFP-Child-Care-Programs
Noncreditable Foods in CACFP Adult Day Care Centers (CSDE):
   https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/
   Noncredreditable_Foods_Adults_CACFP.pdf
Noncreditable Foods in CACFP Child Care Programs (CSDE):
   https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/
   Noncreditable_Foods_CACFP.pdf
Resources for the Child and Adult Care Food Program Meal Patterns (CSDE):
   https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/MealPattern/
   Resources_CACFP_Meal_Patterns.pdf.
```

USDA Memo CACFP 15-2016: Optional Best Practices to Further Improve Nutrition in the CACFP:

https://www.fns.usda.gov/cacfp/optional-best-practices-further-improve-nutrition-cacfp

Ounce Equivalents

Bite Size: Meeting the CACFP Meal Patterns for Children: Module 7C: Grains Component Ounce Equivalents (CSDE webinar):

https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-CACFP-Child-Care-Programs/Related-Resources#BiteSize

Calculation Methods for Grain Ounce Equivalents in the Child and Adult Care Food Program (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/Grain_Calculation_CACFP_Oz_Eq.pdf

Determining Ounce Equivalents of Grains in CACFP Recipes (USDA handout in English and Spanish):

https://www.fns.usda.gov/tn/determining-ounce-equivalents-grains-cacfp-recipes

Exhibit A Grains Tool (USDA's Food Buying Guide for Child Nutrition Programs):

https://foodbuyingguide.fns.usda.gov/ExhibitATool/Index

Exhibit A Grains Tool to the Rescue (USDA webinar):

https://www.fns.usda.gov/tn/exhibit-grains-tool-rescue

Exhibit A: Grain Requirements for Child Nutrition Programs (USDA):

https://foodbuyingguide.fns.usda.gov/Content/TablesFBG/ExhibitA.pdf

Grain Ounce Equivalents for the Child and Adult Care Food Program (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/Grain_Oz_Eq_CACFP.pdf

How to Maximize the Exhibit A Grains Tool (USDA webinar):

https://www.fns.usda.gov/tn/how-maximize-exhibit-grains-tool

How to Use the Grain Ounce Equivalents Chart for the Child and Adult Care Food Program (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/How_to_Use_Ounce_Equivalents_Chart_CACFP.pdf

Ounce Equivalents (Documents/Forms section of the CSDE's Crediting Foods in CACFP Adult Day Care Centers webpage):

https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-CACFP-Adult-Day-Care-Centers/Documents#OunceEquivalents

Ounce Equivalents (Documents/Forms section of the CSDE's Crediting Foods in CACFP Child Care Programs webpage):

https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-CACFP-Child-Care-Programs/Documents#OunceEquivalents

Using Ounce Equivalents for Grains in the CACFP (USDA handouts in English and Spanish): https://www.fns.usda.gov/tn/using-ounce-equivalents-grains-cacfp

WGR Criteria

Bite Size: Meeting the CACFP Meal Patterns for Children: Module 7B: Grains Component Whole Grain-rich Requirement (CSDE webinar):

https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-CACFP-Child-Care-Programs/Related-Resources#BiteSize

How to Spot Whole Grain-rich Foods for the CACFP (USDA handouts in English and Spanish): https://www.fns.usda.gov/tn/how-spot-whole-grain-rich-foods-cacfp

Identifying Whole Grain-rich Foods for the CACFP (USDA handouts and webinars in English and Spanish):

https://www.fns.usda.gov/tn/identifying-whole-grain-rich-foods-cacfp

Is My Recipe Whole Grain-Rich in the CACFP? (USDA handouts in English and Spanish): https://www.fns.usda.gov/tn/my-recipe-whole-grain-rich-cacfp

When Commercial Grain Products Require a Product Formulation Statement to Credit in the Child and Adult Care Food Program (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Crediting/When_Commercial_Grain_Products_Require_PFS_CACFP.pdf

Whole Grain-rich Requirement (Documents/Forms section of the CSDE's Crediting Foods in CACFP Adult Day Care Centers webpage):

https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-CACFP-Adult-Day-Care-Centers/Documents#WGR

Whole Grain-rich Requirement (Documents/Forms section of the CSDE's Crediting Foods in CACFP Child Care Programs webpage):

https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-CACFP-Child-Care-Programs/Documents#WGR

Administrative Review (AR): A periodic review of an institution's operations of the Child Nutrition Programs, conducted by the Connecticut State Department of Education to monitor performance and assess compliance with all USDA regulations.

amaranth: A small type of gluten-free pseudo-grain. Amaranth is a whole grain. For more information, refer to "pseudo-grains" in this section.

azodicarbonamide (ADA): A chemical substance approved by the FDA for use as a whitening agent in cereal flour and a dough conditioner in bread baking.

barley: A whole grain that has a very tough hull. Whole barley and hulled barley are whole grains, but pearled barley is not. For more information, refer to "pearled grains" in this section.

berries (such as wheat berries and rye berries): The whole kernel of grain.

bleached flour: Flour treated with chemical agents to speed up the natural aging process and produce a whiter flour with a finer grain and softer texture. Bleached flour is a creditable grain if it is enriched. For information on crediting enriched grains, refer to the CSDE's resource, *Crediting Enriched Grains in the Child and Adult Care Food Program.*

bran: The seed husk or outer coating of cereal grains such as wheat, rye, and oats. Examples include oat bran, wheat bran, corn bran, rice bran, and rye bran. Bran credits the same as enriched grains.

bromated flour: A type of flour with added potassium bromate, which promotes gluten development to improve dough's baking qualities (such as the rise and elasticity of dough). This flour is more commonly available with ascorbic acid added to provide the elasticity instead of potassium bromate. Bromated flour is a creditable grain if it is enriched. For more information, refer to "unbromated flour" in this section. For information on crediting enriched grains, refer to the CSDE's resource, *Crediting Enriched Grains in the Child and Adult Care Food Program*

buckwheat: A type of gluten-free pseudo-grain typically used in foods like pancakes and soba noodles. that is botanically a relative of rhubarb. Buckwheat is a whole grain. For more information, refer to "pseudo-grains" in this section.

bulgur: Precooked parboiled (cracked or steamed) whole-wheat grains.

CACFP adult meal patterns: The required food components and minimum serving sizes that adult day care centers participating in the CACFP must provide to receive federal reimbursement for meals (breakfast, lunch, and supper) and snacks served to participants. For more information, refer to the CSDE's resource, *CACFP Adult Meal Patterns*, and visit the CSDE's Meal Patterns for CACFP Adult Day Care Centers webpage.

CACFP facilities: Child care centers, family day care homes, emergency shelters, and at-risk afterschool programs that participate in the USDA's Child and Adult Care Food Program.

CACFP meal patterns for children: The required food components and minimum serving sizes that facilities participating in the CACFP must provide to receive federal reimbursement for meals and snacks served to children. The CACFP meal patterns for children apply to children ages 1-12; children ages 15 and younger of migrant workers; children of any age with disabilities; and children through age 18 in at-risk afterschool programs and emergency shelters. For more information, refer to the CSDE's resource, *CACFP Meal Patterns for Children*, and visit the CSDE's Meal Patterns for CACFP Child Care Programs webpage.

CACFP sponsor: A public or private nonprofit organization that is entirely responsible for the administration of the CACFP in one or more day care homes, child care centers, emergency shelters, at-risk afterschool care centers, or adult day care centers. In some situations, for-profit institutions may also be eligible to participate in the CACFP. For more information, refer to Section 226.2 of the CACFP regulations (7 CFR 226).

cereal grains: The seeds that come from grasses. Cereal grains can be whole grain (such as amaranth, barley, buckwheat, corn, millet, oats, quinoa, rice, rolled wheat, rye, sorghum, triticale, wheat, and wheat berries) or enriched (such as enriched cornmeal, corn grits, and farina).

Child Nutrition (CN) label: A statement that clearly identifies the contribution of a food product toward the meal pattern requirements, based on the USDA's evaluation of the product's formulation. CN labels are available only for main dish entrees that contain at least ½ oz eq of the MMA component. Some examples include beef patties, cheese or meat pizzas, meat or cheese and bean burritos, egg rolls, and breaded fish portions. CN-labeled foods usually indicate the contribution of vegetables, grains, and fruits that are part of these products. For more information, refer to the CSDE's resource, *Using Child Nutrition (CN) Labels in the Child and Adult Care Food Program*, and visit the USDA's Child Nutrition (CN) Labeling webpage.

Child Nutrition Programs: The USDA's federally funded programs that provide nutritious meals and snacks to children, including the National School Lunch Program (NSLP), School Breakfast Program (SBP), Afterschool Snack Program, Special Milk Program (SMP), Summer Food Service Program (SFSP), Seamless Summer Option (SSO) of the NSLP, Fresh Fruit and Vegetable Program (FFVP), and Child and Adult Care Food Program (CACFP). The CACFP also provides nutritious meals and snacks to the frail elderly in adult day care centers. For more information, visit the CSDE's Child Nutrition Programs webpage.

combination foods: Foods that contain more than one food component, such as pizza, burritos, and smoothies made with milk and fruit. For example, macaroni and cheese contains pasta (grains) and cheese (meat/meat alternate). Combination foods generally cannot be separated (such as pizza and burritos) or are not intended to be separated (such as a hamburger on a bun or turkey sandwich).

corn masa: Dough made from masa harina that is used for making corn products such as tortillas, tortilla chips, and tamales. Corn masa is nixtamalized and credits as a whole grain. For more information, refer to "Whole grains" in section 1 and the CSDE's resource, *Crediting Whole Grains in the Child and Adult Care Food Program*.

cornmeal: Meal made from ground, dried corn.

couscous: A type of grain product similar to pasta that is made from crushed semolina.

cracked wheat: Whole-wheat grains cut or crushed into smaller pieces.

creditable food: A food or beverage that counts toward the meal pattern requirements for a reimbursable meal or snack in the USDA's Child Nutrition Programs. For more information, visit the CSDE's Crediting Foods in CACFP Child Care Programs or Crediting Foods in CACFP Adult Day Care Centers webpage.

creditable grains: The ingredients in a commercial grain product or standardized recipe that credit toward the grains component. For the CACFP meal patterns creditable grains include whole grains, enriched grains, bran, and germ.

DATEM or datem: An abbreviation for "diacetyl tartaric acid ester of mono- and diglycerides," which is an emulsifier used in baking. DATEM strengthens the gluten network in dough to improve the bread's texture and shape.

degerminated cornmeal: Cornmeal that has the germ removed to increase shelf life. Degerminated cornmeal is not a whole grain.

Dietary Guidelines for Americans: A federal document that provides science-based advice for Americans ages 2 and older to promote health and reduce risk for chronic diseases through diet and physical activity. The U.S. Department of Health and Human Services and the U.S. Department of Agriculture jointly publish the *Dietary Guidelines* every five years. This document forms the basis of federal food, nutrition education, and information programs. For more information, visit the Dietary Guidelines for Americans webpage.

endosperm: The soft, white inside portion of the whole-grain kernel. The endosperm contains starch, protein, and small amounts of B vitamins.

enriched grains: Refined grains (such as wheat, rice, and corn) and grain products (such as cereal, pasta, and bread) that have some vitamins and minerals added to replace the nutrients lost during processing. The five enrichment nutrients are added within limits specified by the FDA, and include thiamin (B₁), riboflavin (B₂), niacin (B₃), folic acid, and iron. For more information, refer to "Enriched grains" in section 1 and the CSDE's resource, *Crediting Enriched Grains in the Child and Adult Care Food Program*.

enrichment: Adding back nutrients (usually vitamins or minerals) originally present in a food that were lost during processing. Enrichment nutrients are added back in approximately the same levels as were originally present in the food. For more information, refer to "enriched grains" in this section.

Exhibit A chart: The USDA's chart that indicates the required weight (groups A-G) or volume (groups H-I) for different types of grain foods to provide 1 oz eq of the grains component (CACFP meal patterns and NSLP and SBP meal patterns for grades K-12 and preschoolers) or 1 serving of the grains/breads component (SFSP meal pattern and ASP meal pattern for grades K-12). The required amounts in Exhibit A chart are not the same for all Child Nutrition Programs because these programs have different meal patterns. The CSDE's resource, *Grain Ounce Equivalents for the Child and Adult Care Food Program,* indicates the Exhibit A grain oz eq that apply to the CACFP. Groups F and G (grain-based desserts) are not included because grain-based desserts do not credit as the grains component in the CACFP. For more information, refer to the USDA's *Exhibit A: Grain Requirements for Child Nutrition Programs*.

flour: Finely ground and sifted wheat or other grains such as rye, corn, rice, or buckwheat.

fortification: Adding nutrients (usually vitamins or minerals) that were not originally present in a food or beverage, or adding nutrients at levels that are higher than originally present. Fortification is used for naturally nutrient-rich products based on scientifically documented health needs (such as fortifying milk with vitamin D to increase the body's absorption of calcium), or to enhance the perceived nutritional value of products with little or no natural nutritional value, e.g., fortifying "energy" bars made from processed flour with multiple vitamins and minerals. Fortification nutrients are added to products in varying amounts, from small percentages up to amounts greater than recommended intakes.

germ: The vitamin-rich sprouting section of the whole-grain kernel. Germ credits the same as enriched grains.

gluten: The general name for proteins naturally found in certain cereal grains, such as barley, rye, wheat, and triticale (a wheat-rye hybrid). Gluten has elastic properties that help dough to stretch, rise, and maintain moisture when heated. It is frequently used as an additive to improve texture and promote moisture retention in processed foods. Gluten is a grain derivative is ignored for the CACFP Rule of Three.

graham flour: A type of coarsely ground whole wheat flour.

grain berries: The unprocessed whole kernel of grain, such as wheat berries and rye berries.

grain derivative: A by-product of grains, such as malt made from barley, wheat gluten made from wheat, and maltodextrin made from corn. Grain derivatives are ignored for the CACFP Rule of Three. For examples of grain derivatives, refer to column B in table 4-3.

grains component: The meal component of the USDA meal patterns that is comprised of cereal grains and products made from their flours. Creditable grain foods include products and recipes that are whole grain-rich (WGR) or enriched. Creditable cooked and ready-to-eat (RTE) breakfast cereals include products that are WGR, enriched, or fortified.

grains: Plants in the grass family, which produce a dry, edible fruit commonly called a kernel, grain, or berry.

grits: A coarsely ground grain made with hominy or stone-ground corn.

groats: The hulled kernels of various cereal grains, such as oat, wheat, rye, buckwheat, and barley. Groats are whole grains.

hominy grits: A type of grits made from hominy.

hominy: A traditional food in Mexican and Native American cultures that is commonly served as a vegetable or milled grain product, e.g., hominy grits. Hominy is made from whole kernels of maize (dried field corn) that have been soaked in an alkaline solution (nixtamalized). This process removes the hull and germ, causes the corn to puff up to about double its normal size, and increases the bioavailability of certain nutrients, such as calcium and niacin. For more information, refer to "Whole grains" in section 1 and the CSDE's resource, *Crediting Whole Grains in the Child and Adult Care Food Program.*

instant oatmeal: Oatmeal made from whole-grain oats that are thinner and more finely chopped than rolled oats. Instant oatmeal has a soft texture and cooks quickly.

1-cysteine: An amino acid used in baking to help soften the dough and reduce processing time.

maltodextrin: A carbohydrate derived from starch (typically from corn, potatoes, rice, or wheat) that is used as a food additive to enhance texture and flavor. Maltodextrin is a grain derivative that is ignored for the CACFP Rule of Three. For more information, refer to "grain derivative" in this section and column B in table 4-3.

masa harina: Corn flour used for making corn products such as tortillas, tortilla chips, and tamales. Masa harina is nixtamalized and credits as a whole grain. For more information, refer to "Whole grains" in section 1 and the CSDE's resource, *Crediting Whole Grains in the Child and Adult Care Food Program*.

meal pattern: Refer to CACFP meal pattern in this section.

meal: A grain made by coarsely grinding corn, oats, wheat, or other grains. Whole grain, enriched, or fortified meal credits toward the grains component of the USDA's meal patterns.

meals: Refer to "reimbursable meals" in this section.

millet: A group of several small related grains. Millet is a gluten-free whole grain

modified food starch: A chemically altered ingredient made from starch that is used as a thickening agent, stabilizer, or emulsifier. The most common types of modified food starch are made from corn, wheat, potato, and tapioca. Modified food starch is a grain derivative that is ignored for the CACFP Rule of Three. For more information, refer to "grain derivative" in this section and column B in table 4-3.

National School Lunch Program (NSLP): The USDA's federally assisted meal program operating in public and nonprofit private schools and residential child care institutions. The NSLP provides nutritionally balanced, low-cost or free lunches to children each school day. It was established under the National School Lunch Act, signed by President Harry Truman in 1946. For more information, visit the CSDE's National School Lunch Program webpage.

nixtamalization: A process in which dried corn is soaked and cooked in an alkaline (slaked lime) solution. This process increases the bioavailability of certain nutrients and provides a nutritional profile similar to whole-grain corn. Nixtamalized corn is used to make hominy, masa harina (corn flour), corn masa (dough from masa harina), and certain types of cornmeal. Nixtamalized corn credits as a whole grain. For more information, refer to "Whole grains" in section 1 and the CSDE's resource, *Crediting Whole Grains in the Child and Adult Care Food Program*.

noncreditable grains: Noncreditable grains are grain ingredients that do not count toward the grains component of the CACFP meal patterns. Examples include yellow corn flour, wheat flour, and semolina. For more examples of noncreditable grains, refer to column A in table 4-3.

old-fashioned oats (rolled oats): Whole-grain oats that have been steamed and flattened. They have a firm texture and cook faster than steel-cut oats.

ounce equivalent (oz eq): A unit of measure that indicates the contribution of a given serving size toward the grains component. To provide 1 oz eq, an enriched grain food must contain 16 grams of credible grain and a WGR enriched grain food must contain 16 grams of credible grains including at least 8 grams of whole grains. The amount of a grain food that provides 1 oz eq varies because different types of foods contain different amounts of creditable grains. For example, 1 oz eq of the grains component can be less than a measured ounce (e.g., pretzels, bread sticks, and crackers), equal to a measured ounce (e.g., bagels, biscuits, bread, rolls, cereal grains, and RTE breakfast cereals), or more than a measured ounce (e.g., muffins and pancakes). For more information, refer to "Ounce Equivalents" in section 1 and the CSDE's resource, *Grain Ounce Equivalents for the Child and Adult Care Food Program*.

pearled grains: Removing the bran from the whole grain, such as pearled barley. Pearled grains are not whole grains.

primary grain ingredient: The greatest grain ingredient by weight. For commercial grain foods, this is the first ingredient (excluding water) listed in the product's ingredients statement. For commercial combination foods that contain a grain portion, this is the first grain ingredient (excluding water) listed in the product's ingredients statement. For commercial combination foods that contain a grain portion listed separately, this is the first ingredient (excluding water) listed in the grain portion of the product's ingredients statement.

product fact sheet: Refer to "product specification sheet" in this section.

product formulation statement (PFS): An information statement obtained from the manufacturer that provides specific information about how a product credits toward the USDA's meal pattern requirements, and documents how this information is obtained citing Child Nutrition Program resources or regulations. All creditable ingredients in this statement must match a description in the USDA's Food Buying Guide for Child Nutrition Programs. The PFS must be prepared on company letterhead with the signature of a company official and the date of issue. Unlike a CN label, a PFS does not provide any warranty against audit claims. CACFP facilities should check the manufacturer's crediting information for accuracy prior to including the product in reimbursable meals. For more information, refer to section 4 and the CSDE's resources, Using Product Formulation Statements in the Child and Adult Care Food Program, When Commercial Grain Products Require a Product Formulation Statement to Credit in the Child and Adult Care Food Program, and Accepting Processed Product Documentation in the Child and Adult Care Food Program.

product specification sheet: Manufacturer sales literature that provides various information about the company's products. These materials do not provide the specific crediting information that is required on a product formulation statement and cannot be used to determine a product's contribution toward the USDA's meal pattern components.

pseudo-grains: Plants that are not in the same botanical family as cereal grains but have nutritional profiles and uses similar to "true" cereal grains. Examples include amaranth, quinoa and buckwheat.

quinoa: A small, round type of pseudo-grain that is botanically a relative of Swiss chard and beets. Quinoa is a whole grain. For more information, refer to "pseudo-grains" in this section.

refined grains: Grains that have been processed to remove the bran and germ, making the product less nutritious than whole grains. Refined grains may or may not be enriched. For more information, refer to "enriched grains" in this section.

reimbursable meals: Meals and snacks that meet the meal pattern requirements of the USDA's regulations for Child Nutrition Programs.

semolina: A type of meal made from coarsely ground hard wheat (e.g., durum) used in puddings and pasta. Semolina is not a whole grain.

serving size or portion: The weight, measure, number of pieces, or slices of a food or beverage. For meals to be reimbursable, CACFP facilities must provide the minimum servings specified in the USDA's meal patterns.

soy lecithin: A substance made from soy oil that is used as an emulsifier or stabilizer in food.

standard of identity: The mandatory government requirements that determine what a food product (like whole-wheat bread) must contain or may contain to be marketed under a certain name in interstate commerce. These standards protect consumers by ensuring that a label accurately reflects what is inside. For example, mayonnaise is not an imitation spread, and ice cream is not a similar, but different, frozen dessert. The USDA develops standards for meat and poultry products. The FDA develops standards for other food products.

standardized recipe: A recipe that a given food service operation has tested and adapted for use. This recipe produces the same good results and yield every time when the exact procedures are used with the same type of equipment, and the same quantity and quality of ingredients. Standardized recipes include specific information such as ingredients, weights and measures, preparation directions, serving directions, yield, and portion size. For more information, visit the "Standardized Recipes" section of the CSDE's Crediting Foods in CACFP Child Care Programs or Crediting Foods in CACFP Adult Day Care Centers webpage.

steel-cut oats: Whole-grain oats that are chopped into small pieces. Steel-cut oats have a chewier texture than rolled oats and instant oats and take the longest to cook.

triticale: A hybrid of durum wheat and rye. Triticale is a whole grain.

unbleached flour: Flour that has aged naturally after being milled. Unbleached flour has an off-white color and a denser grain than bleached flour. It provides more structure in baked goods due to its denser texture. Unbleached flour is a creditable grain if it is enriched. For information on crediting enriched grains, refer to the CSDE's resource, *Crediting Enriched Grains in the Child and Adult Care Food Program*.

unbromated flour: A baking flour that is higher in protein and does not contain potassium bromate. Unbromated flour develops more gluten, which results in a more stable baked product. It is commonly used for baking at high altitudes. Unbromated flour is a creditable grain if it is enriched. For information on crediting enriched grains, refer to the CSDE's resource, *Crediting Enriched Grains in the Child and Adult Care Food Program*.

vital wheat gluten: A powdered form of wheat gluten that is used in baking to add elasticity to flours that are low in gluten, such as whole wheat or rye. Vital wheat gluten is a grain derivative that is ignored for the CACFP Rule of Three. For more information, refer to "grain derivative" in this section and column B in table 4-3.

wheat bread: Bread that often has wheat flour or enriched wheat flour (not whole-wheat flour) as an ingredient. Wheat bread is not whole grain unless it is labeled "whole-wheat bread." Wheat bread is low in fiber unless the manufacturer has added fiber.

wheat gluten: The protein component of the wheat grain that helps baked goods hold their shape. Wheat gluten is a grain derivative that is ignored for the CACFP Rule of Three. For more information, refer to "grain derivative" in this section and column B in table 4-3.

whey: A milk protein used to emulsify, thicken, and brown baked goods.

whole grain-rich (WGR): Foods that contain at least 50 percent whole grains and the remaining grain ingredients are enriched, bran, or germ. For more information, refer to section 3. Note: This definition applies only to the CACFP. The WGR definition for school nutrition programs is different.

whole grains: Grains that consist of the entire kernel, including the starchy endosperm, the fiber-rich bran, and the nutrient-rich germ. All grains start out as whole grains, but many are processed to remove the bran and germ, which also removes many of the nutrients. Whole grains are nutrient rich, containing vitamins, minerals, fiber, antioxidants, and health-enhancing phytonutrients such as lignans and flavonoids. Examples of whole grains include whole wheat, whole oats, oatmeal, whole-grain cornmeal, brown rice, whole rye, whole barley, wild rice, buckwheat, and bulgur (cracked wheat). For more information, refer to "Whole grains" in section 1 and the CSDE's resource, *Crediting Whole Grains in the Child and Adult Care Food Program*.

whole-grain flour: Flour made by grinding the entire whole-grain kernel, including the fiber-rich bran, nutrient-rich germ, and starchy endosperm. Flour or meal that does not contain all parts of the grain is not whole grain, e.g., degermed corn, milled rice, and wheat flour. For more information, refer to "Whole grains" in section 1 and the CSDE's resource, *Crediting Whole Grains in the Child and Adult Care Food Program*.

whole-wheat bread: Bread that contains the whole grain, including the starchy endosperm, the fiber-rich bran, and the nutrient-rich germ. Whole-wheat flour will be listed as the first grain ingredient.

