

# When Commercial Grain Products Require a Product Formulation Statement to Credit in the Child and Adult Care Food Program

This guidance applies to reimbursable meals and snacks served in child care centers, family day care homes, emergency shelters, at-risk afterschool care centers, and adult day care centers that participate in the U.S. Department of Agriculture's (USDA) Child and Adult Care Food Program (CACFP).

For information on the CACFP meal patterns for children and the CACFP adult meal patterns, visit the Connecticut State Department of Education's (CSDE) [Meal Patterns for the Child and Adult Care Food Program](#) webpage. For information on the crediting requirements, visit the CSDE's [Crediting Foods in the Child and Adult Care Food Program](#) webpage and [Crediting Documentation for the Child Nutrition Programs](#) webpage.

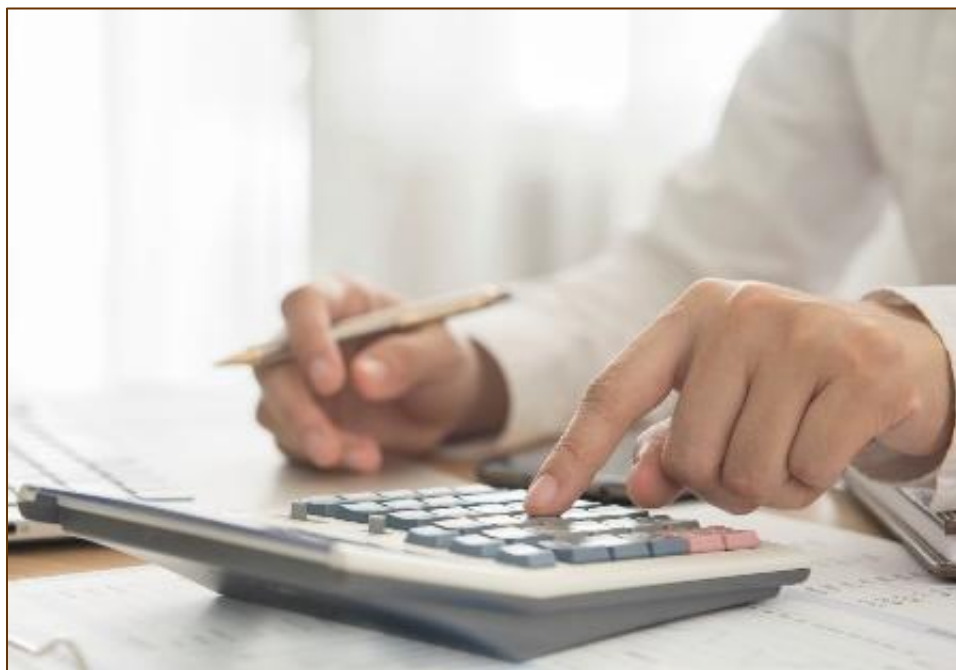


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# When Commercial Grain Products Require a PFS to Credit in the Child and Adult Care Food Program

## Overview of Crediting Requirements for Grains

CACFP facilities must be able to document that commercial grain products meet the crediting requirements of the CACFP meal patterns. A manufacturer's product formulation statement (PFS) is required when a commercial product's ingredients statement and packaging do not provide sufficient information to determine if the grain product meets the CACFP crediting requirements or whole grain-rich (WGR) criteria.

To credit as the grains component, grain foods must contain creditable grains and meet the CACFP meal pattern requirements. 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). Guidance on crediting grains is available in the "[Grains](#)" section of the CSDE's Crediting Foods in the Child and Adult Care Food Program webpage.

Grain foods must be whole grain-rich (WGR) or enriched. Cooked and RTE breakfast cereals must be WGR, enriched, or fortified; and cannot exceed 6 grams of added sugars per dry ounce. 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](#), [Crediting Enriched Grains in the Child and Adult Care Food Program](#), and [Crediting Breakfast Cereals in the Child and Adult Care Food Program](#).

### CACFP whole grain-rich (WGR) requirement

The preschool meal patterns require at least one serving of WGR grains per day. The USDA's [CACFP best practices](#) recommend at least two servings of WGR grains per day. For guidance on the preschool WGR criteria, refer to the CSDE's [Guide to Meeting the Whole Grain-rich Requirement for the Child and Adult Care Food Program](#).



# When Commercial Grain Products Require a PFS to Credit in the Child and Adult Care Food Program

## Overview of Product Formulation Statement (PFS)

A PFS is a document developed by manufacturers that provides specific information about how a product credits toward the USDA's meal patterns for the Child Nutrition Programs. These forms generally include a detailed explanation of what the product contains and indicate the amount of each ingredient in the product by weight. The information on PFS forms might vary among manufacturers because the USDA does not review, approve, or monitor these forms.

## Requirements for PFS forms

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. This signature may be handwritten, stamped, or electronic.

PFS forms must include specific elements to be acceptable as crediting documentation for the school nutrition programs. This includes the product name, product code; serving or portion size; creditable ingredients; and information to demonstrate how creditable ingredients contribute to the USDA's meal patterns for the school nutrition programs. For grain products, this includes:

- the weight (grams) of each creditable grain per serving;
- how the product provides that amount according to the USDA's [Food Buying Guide for Child Nutrition Programs](#) (FBG) or USDA's regulations, guidance, or policies; and
- if applicable, the total weight of any noncreditable grains per serving.

The product's label with the ingredients statement must also be provided.

## Reviewing PFS forms for accuracy

The USDA requires that CACFP facilities are responsible for verifying that the calculations and meal pattern contribution statement on a manufacturer's PFS are accurate. Prior to purchasing, serving, and claiming the food product in reimbursable meals and snacks, CACFP facilities must review the PFS to ensure that it includes each required element and the crediting calculations are correct. If any information is missing or incorrect, CACFP facilities must request a revised PFS from the manufacturer, with supporting documentation if needed.

# When Commercial Grain Products Require a PFS to Credit in the Child and Adult Care Food Program

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 reimbursable meals or snacks.

## Storing PFS forms

CACFP facilities must maintain PFS forms and crediting documentation on file in accordance with the records retention requirements for the CACFP (refer to the CSDE's resource, [Records Retention Requirements for the Child and Adult Care Food Program](#)). This documentation must be current and will be reviewed by the CSDE during the Administrative Review of the CACFP.

The CSDE recommends maintaining PFS forms in a designated binder or folder for easy reference. Electronic copies of PFS forms should be stored in an easily accessible electronic folder.

## Guidance for PFS Forms

Information on the requirements for PFS is available in the CSDE's resources, [Using Product Formulation Statements in the Child and Adult Care Food Program](#) and [Accepting Processed Product Documentation in the Child and Adult Care Food Program](#), and [USDA Memo SP 05-2025, CACFP 04-2025, SFSP 02-2025: Guidance for Accepting Processed Product Documentation for Meal Pattern Requirements](#). Additional guidance is available in the "[Product Formulation Statements](#)" section of the CSDE's Crediting Documentation for the Child Nutrition Programs webpage.

Training on the requirements for PFS forms is available in [Module 8: Meal Pattern Documentation for Crediting Commercial Processed Products](#) of the CSDE's training program, *What's in a Meal: Meal Patterns for Grades K-12 in the School Nutrition Programs*.

# When Commercial Grain Products Require a PFS to Credit in the Child and Adult Care Food Program

## Overview of Grain Products that Require a PFS

CACFP facilities must obtain a PFS from the manufacturer when a commercial product's ingredients statement and packaging do not provide sufficient information to determine if the grain product meets the crediting or WGR criteria for the grains component. A PFS is required for commercial products when any of the situations below apply.

1. The first ingredient is not a creditable grain, but the product contains more than one creditable grain. The PFS must indicate that the combined weight of all creditable grains is the greatest ingredient by weight.
2. *Applies only to WGR foods:* 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.
3. *Applies only to WGR foods:* 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.
4. *Applies only to WGR foods:* The first ingredient is a flour blend of whole and enriched flour. The PFS must indicate one of the following: a) the whole grain content is at least 8 grams per oz eq (groups A-E); or b) the weight of the whole grain in the flour blend is more than the first ingredient (excluding water) listed after the flour blend.
5. A commercial combination food that contains a grain portion does not have a Child Nutrition (CN) label. The PFS must indicate that creditable grains are the greatest ingredient by weight in the grain portion.
6. The manufacturer claims that the product's serving size is less than the required weight or volume in the USDA's chart, [Exhibit A: Grain Requirements for Child Nutrition Programs](#) (Exhibit A). 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.
7. The product is not listed 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.

For guidance on the steps for reviewing a grain product's PFS, refer to "[Reviewing a Grain Product's PFS for Creditable Grains](#)" in this document. For additional assistance with reviewing PFS forms for grains, contact the CSDE's [CACFP staff](#).

# When Commercial Grain Products Require a PFS to Credit in the Child and Adult Care Food Program

When reviewing the first ingredient on the product's label, water is ignored. For combination foods, the crediting and WGR requirements apply only to the grain portion.

## Guidance for Grain Products that Require a PFS

The specific situations for each type of grain product that requires a PFS are summarized below. The examples indicate if a PFS is required for each school nutrition program and what it must indicate. Enriched grains are indicated in italics (e.g., *enriched wheat flour*), whole grains are indicated in green italics (e.g., *whole wheat flour*), and noncreditable grains are indicated in red italics (e.g., *yellow corn flour*).

### Situation 1: First ingredient is not creditable grain but more than one creditable grain

#### *Grain product*

To credit as the grains component, the product's PFS must indicate that the combined weight of all creditable grains is the greatest ingredient by weight.

- **Example: corn muffin (grain product)**

Ingredients: Water, sugar, *whole-grain corn flour*, *whole wheat flour*, *enriched flour (wheat flour, niacin, iron, thiamin mononitrate, riboflavin, folic acid)*, eggs, soybean/canola oil, milk whey, leavening (sodium acid pyrophosphate, baking soda), vital wheat gluten, sugar, nonfat milk, guar gum.

The first ingredient after water is sugar but the product also contains three creditable grains: two whole grains (*whole-grain corn flour* and *whole wheat flour*); and enriched flour. To credit as the grains component, the product's PFS must indicate that the combined weight of the three creditable grains is more than the weight of the sugar.

# When Commercial Grain Products Require a PFS to Credit in the Child and Adult Care Food Program

## ***Combination food with grain portion***

To credit the grain portion as the grains component, the product's PFS must indicate that the combined weight of all creditable grains in the grain portion is the greatest ingredient by weight in the grain portion.

- **Example: Breaded chicken nuggets (combination food with grain portion)**  
Ingredients: Chicken, water, salt, and natural flavor. **Breaded with:** *cornmeal*, water, *white whole wheat flour*, salt, *whole-grain corn flour*, dried onion, dried garlic, dried yeast, brown sugar, extractives of paprika, and spices. Breading set in vegetable oil.

The first ingredient in the breading (grain portion) is cornmeal. Cornmeal is not a creditable grain because it is not enriched or whole grain. However, the breading also contains two whole grains (white whole wheat flour and whole-grain corn flour). To credit the breading as the grains component, the product's PFS must indicate that the combined weight of the two whole grains is more than the weight of the cornmeal.

## **Situation 2: First ingredient is not whole grain but more than one whole grain**

The first ingredient is not a whole grain, but the product contains more than one whole grain. This situation applies only to WGR foods. The WGR requirements depend on whether the commercial product is a grain item or a combination food with a grain portion.

## ***WGR requirements for grain products***

To credit as a WGR food, the product's PFS must indicate that the combined weight of all whole grains is the greatest ingredient by weight.

- **Example: Oat bread (grain product)**  
Ingredients: *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, yeast, soybean oil, salt.

The first ingredient (unbleached enriched wheat flour) is not a whole grain, but the product contains two whole grains (whole wheat flour and whole oats). To credit as the grains component, the product's PFS must indicate that the combined weight of the two whole grains is equal to or more than the weight of the enriched flour.



# When Commercial Grain Products Require a PFS to Credit in the Child and Adult Care Food Program

## ***WGR requirements for combination food with grain portion***

To credit the grain portion as a WGR food, the product's PFS must indicate that the combined weight of all whole grains in the grain portion is the greatest ingredient by weight in the grain portion.

- **Example 2: Breaded chicken nuggets (combination food)**

Ingredients: Chicken, water, salt, and natural flavor. **Breaded with:** *enriched flour (wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid)*, water, **white whole wheat flour**, salt, **whole-grain corn flour**, dried onion, dried garlic, dried yeast, brown sugar, extractives of paprika, and spices. Breading set in vegetable oil.

The first ingredient in the breading (grain portion) is enriched flour. The breading contains two whole grains (white whole wheat flour and whole-grain corn flour). To credit as the grains component, the product's PFS must indicate that the combined weight of the two whole grains in the breading (grain portion) is equal to or more than the weight of the enriched flour.

## **Situation 3: Whole grain with two or more enriched grains**

The first ingredient is a whole grain, and the product contains two or more enriched grains. This situation applies only to WGR foods:

## ***WGR requirements for grain products***

To credit as a WGR food, the product's PFS must indicate that the weight of the whole grain is equal to or more than the combined weight of the enriched grains.

- **Example: Wheat roll (grain product)**

Ingredients: **Whole wheat flour**, *enriched flour (wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid)*, *enriched corn meal (corn meal, ferrous sulfate, niacin, thiamine mononitrate, riboflavin, folic acid)*, yeast, wheat gluten, contains less than 2% of each of the following: soybean oil, sugar, salt, calcium propionate (preservative), baking soda.

The first ingredient is whole wheat flour. The product contains two enriched grains (enriched flour and enriched corn meal). To credit as the grains component, the product's PFS must indicate that the weight of the whole wheat flour is equal to or more than the combined weight of the two enriched grains.

# When Commercial Grain Products Require a PFS to Credit in the Child and Adult Care Food Program

## *WGR requirements for combination food with grain portion*

To credit the grain portion as a WGR food, the product's PFS must indicate that the weight of the whole grain in the grain portion is equal to or more than the combined weight of the enriched grains in the grain portion.

- **Example 2: Breaded chicken nuggets (combination food with grain portion listed separately)**

Ingredients: Chicken, water, salt, and natural flavor. **Breaded with:** *whole-grain cornmeal*, water, *enriched flour (wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid, salt, enriched corn flour*, dried onion, dried garlic, dried yeast, brown sugar, extractives of paprika, and spices. Breeding set in vegetable oil.

The first ingredient is whole wheat flour. The product contains two enriched grains (enriched flour and enriched corn meal). To credit as a WGR food, the product's PFS must indicate that the weight of the whole wheat flour is equal to or more than the combined weight of the two enriched grains.

# When Commercial Grain Products Require a PFS to Credit in the Child and Adult Care Food Program

## Situation 4: Flour blends

The first ingredient is a flour blend of whole and enriched flour. For example, the ingrained statement lists “flour blend (whole wheat flour, enriched flour.” This situation applies only to WGR foods:

For a product that contains a flour blend to credit as a WGR food, the product’s PFS must indicate one of the following: 1) the whole grain content is at least 8 grams per oz eq for groups A-G of Exhibit A; or 2) the weight of the whole grain in the flour blend is more than the first ingredient (excluding water) listed after the flour blend.

A PFS is required because flour blends do not indicate if the whole grain is the greatest grain ingredient by weight. For example, if the flour blend is 40 percent of the product’s weight (25 percent whole wheat flour and 15 percent enriched flour) and the first ingredient after the flour blend is sugar (30 percent of the product’s weight), the sugar weighs more than the whole wheat flour.

- **Example: Blueberry muffin (grain food)**

Ingredients: Water, **flour blend** (*whole grain wheat flour, enriched bleached flour [wheat flour, niacin, iron, thiamine mononitrate, riboflavin, folic acid]*), sugar, egg, soybean/canola oil, blueberries, leavening (baking soda, sodium aluminum phosphate, monocalcium phosphate), milk whey, wheat gluten, salt.

The first ingredient after water is a flour blend of whole grain and enriched flour. To credit as the grains component, the product’s PFS must indicate that the whole wheat flour in the flour blend is at least 8 grams per oz eq or weighs more than the sugar (first ingredient after flour blend).

A PFS is not required for flour blends that contain only whole grains, such as “flour blend (whole wheat flour, whole-grain oats).”

# When Commercial Grain Products Require a PFS to Credit in the Child and Adult Care Food Program

## Situation 5: No Child Nutrition (CN) label

A commercial combination food that contains a grain portion is not CN labeled. Some examples are pizza and breaded chicken nuggets.

To credit the grain portion as the grains component, the product's PFS must indicate that creditable grains are the greatest ingredient by weight in the grain portion. For the NSLP, SBP, and ASP meal patterns for grades K-12, the PFS must also indicate the total weight of any noncreditable grains in the grain portion.

**Note:** CN labels are available for main dish entrees that contain at least ½ oz eq of the meats/meat alternates (MMA) component. For additional guidance on CN labels, refer to the CSDE's resource, [Using Child Nutrition \(CN\) Labels in the Child and Adult Care Food Program](#), and visit the "[Child Nutrition Labels](#)" section of the CSDE's Crediting Documentation for the Child Nutrition Programs webpage.

## Situation 6: Manufacturer's crediting claim

The manufacturer claims that the product's serving size is less than the required weight or volume in the USDA's Exhibit A chart. For example, a manufacturer claims that a ¾-ounce enriched bagel credits as 1 oz eq of the grains component.

To credit as the grains component, the product's PFS must indicate the weight (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 the NSLP, SBP, and ASP meal patterns for grades K-12, the PFS must also indicate the total weight of noncreditable grains. This is required for the CACFP facility to determine if the product meets the limit for noncreditable grains.

For information on the required quantities for each grain group at breakfast, lunch and snack, refer to the CSDE's resource, [Grain Ounce Equivalents Chart for the Child and Adult Care Food Program](#).

## Situation 7: Not in USDA's Exhibit A chart

A commercial grain product is not listed in the USDA's Exhibit A chart.

To credit as the grains component, the product's PFS must indicate the weight (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.

# When Commercial Grain Products Require a PFS to Credit in the Child and Adult Care Food Program

## Reviewing a Grain Product's PFS for Creditable Grains

When a commercial grain product requires a PFS, the USDA requires that CACFP facilities must obtain and verify the PFS for accuracy prior to purchasing, serving, and claiming the food product in reimbursable meals and snacks. This section provides guidance on how to evaluate a commercial grain product's PFS using the creditable grains version of the USDA's PFS form, [\*Product Formulation Statement for Documenting Grains in Child Nutrition Programs\*](#).

### USDA's PFS form for grain oz eq

The USDA's [\*Product Formulation Statement for Documenting Grains in Child Nutrition Programs\*](#) includes two versions for documenting the crediting contribution of commercial grain products.

- **Crediting Standards Based on Grams of Creditable Grains:** This version provides documentation based on the creditable grains per serving. This PFS is required whenever the product's ingredients statement and packaging do not provide sufficient information to determine if the product meets the crediting or WGR criteria for the grains component.
- **Crediting Standards Based on Exhibit A Weights:** This version provides documentation based on the minimum weight for the applicable grain group in the USDA's Exhibit A chart. For information on the required quantities for each grain group, refer to the CSDE's resource, [\*Grain Ounce Equivalents Chart for the Child and Adult Care Food Program\*](#). For guidance on how to determine a grain product's meal pattern contribution, refer to the CSDE's resource, [\*Calculation Methods for Grain Ounce Equivalents in the Child and Adult Care Food Program\*](#).

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

# When Commercial Grain Products Require a PFS to Credit in the Child and Adult Care Food Program

## 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.


1. **Product name:** The product name stated on the PFS must match or have a similar description to the name on the product label.
2. **Product code:** The product code number is a unique identifier assigned by the manufacturer. It may include numbers, letters, or a combination of both.
3. **Serving size:** The serving size stated on the PFS should represent the amount of the product as purchased or ready for serving. This is the amount of food needed to provide the creditable amount stated on the PFS. The serving size may be stated as a weight (e.g., grams or ounces) or measure (cups), depending on the type of product.
4. **Creditable grain ingredients:** The PFS must list each creditable grain ingredient (whole grains, enriched grains, bran, and germ).
5. **Information to demonstrate how the creditable ingredients contribute toward the meal pattern:** The PFS must include the information needed to calculate the crediting of each ingredient. The PFS must indicate:
  - the Exhibit A grains group (A-I) for the product;
  - if the product contains noncreditable grains and if so, how many grams;
  - a description of each creditable grain ingredient;
  - the grams of each creditable grain ingredient per portion;
  - the appropriate gram standard of creditable grains per serving (16 grams for groups A-G or 28 grams for groups H-I);
  - the creditable amount (oz eq) of each ingredient (obtained by dividing the 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.

# When Commercial Grain Products Require a PFS to Credit in the Child and Adult Care Food Program

Figure 1 shows a completed PFS for the USDA's PFS version for creditable grains, "Crediting Standards Based on Grams of Creditable Grains (ounce equivalent)," for a sample commercial grain product, Wheat Pancakes.

**Figure 1. Sample PFS for grams of creditable grains**



## ABC Bread Company

**Product Formulation Statement for Documenting Grains Ounce Equivalents in Child Nutrition Programs**

Crediting Standards Based on **Grams of Creditable Grains**

Program operators have the option to choose the crediting method that fits their specific menu planning needs.

Food manufacturers/vendors must: 1. Provide the following information on company letterhead signed by an official company representative. 2. Use **Exhibit A: Grain Requirements for Child Nutrition Programs** (Exhibit A) in the "Food Buying Guide for Child Nutrition Programs" (FBG) to complete this form. 3. Provide a copy of the ingredient list from the product package.

**A** Product Name: Wheat Pancakes Code No.: 14005

Manufacturer: ABC Bread Company Serving Size: 2 pancakes, 50 grams ( 1.75 ounces)

**B** I. Does the product meet the whole grain-rich\* criteria? Yes ☒ No ☐

\* Whole grain-rich is the term designated by Food and Nutrition Service to indicate that the grain content of a product is between 50 and 100 percent whole grain with any remaining grains being enriched.

**C** II. Does the product contain noncreditable grains? Yes ☐ No ☒ How many grams?           
(Products with more than 0.24 ounce equivalent (oz eq) or 3.99 grams (g) for Groups A–G or 6.99g for Groups H and I of noncreditable grains do not credit toward the grains requirement for school meals.)

III. Use Exhibit A to determine if the product fits into Groups A–G (baked goods), Group H (cereal grains) or Group I (RTE breakfast cereals). (Different methodologies are applied to calculate the grains contribution based on creditable grains. Groups A–G use the standard of 16g creditable grains per oz eq; Groups H and I use the standard of 28g creditable grains per oz eq or volume.)

**D** Indicate which Exhibit A Group (A–I) the product belongs:   C  

DESCRIPTION OF CREDITABLE GRAIN INGREDIENT <sup>1</sup>	GRAMS OF CREDITABLE GRAIN INGREDIENT PER PORTION <sup>2</sup>	GRAM STANDARD OF CREDITABLE GRAINS PER OZ EQ (16g or 28g) <sup>3</sup>	CREDITABLE AMOUNT
<b>E</b>	<b>F</b>	<b>G</b>	<b>H</b>
	A	B	A ÷ B
Whole wheat flour (30%)	15	16	0.9375
Enriched flour (22%)	11	16	0.6875
<b>Total</b>			<b>I</b> 1.625
<b>Total Creditable Amount<sup>4</sup></b>			<b>J</b> 1.5

<sup>1</sup> Creditable grains vary by Program. See the FBG for specific Program requirements.

<sup>2</sup> (Serving size in grams) X (% of creditable grain in formula); raw dough weight may be used for serving size. Serving sizes other than grams must be converted to grams.

<sup>3</sup> Standard grams of creditable grains from the corresponding Group in Exhibit A.

<sup>4</sup> Total Creditable Amount must be rounded **down** to the nearest quarter (0.25) oz eq. Do **not** round up.

**K** Total weight (per portion) of product as purchased 50g (1.75 oz)

Total creditable amount of product (per portion) 1.5 oz eq

**L** I certify that the above information is true and correct and that a 1.75 ounce portion of this product (ready for serving) provides 1.5 oz eq grains.

For school meals only: I further certify that noncreditable grains **are not** above 0.24 oz eq per portion. Products with more than 0.24 oz eq or 3.99g for Groups A–G or 6.99g for Groups H and I of noncreditable grains do not credit toward the grains requirement for school meals.

**M** John Smith Signature

John Smith Printed Name

President Title

1/14/2026 Date

123-456-7890 Phone Number



# When Commercial Grain Products Require a PFS to Credit in the Child and Adult Care Food Program

## Steps for Reviewing a PFS for Creditable Grains

The guidance below indicates what to review when determining if a PFS for creditable grains is accurate. The letters refer to the green circles in the applicable sections of the sample PFS (ABC Bread Company's Wheat Pancakes) in figure 1.

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

- The PFS for Wheat Pancakes includes all the required information for this section. The menu planner would need to check the product's packaging to confirm that it matches the information on the PFS.

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

If "Yes" is checked, review the information for noncreditable grains in part II (refer to C below) and creditable grain ingredients in part III (refer to E below). A grain food is WGR if the total weight (grams) of the whole-grain ingredients are equal to or more than the weight of the enriched grain ingredients and noncreditable grains do not exceed the required limit.

C. **Part II: "Does the product contain noncreditable grains"**

This PFS is also intended for the National School Lunch Program (NSLP) and School Breakfast Program (SBP), which require a noncreditable grains limit for WGR and enriched grain foods. The CACFP "Rule of Three" states that noncreditable grains cannot be any of the first three grain ingredients but it does not require a specific limit for noncreditable grains. If the PFS indicates that the product meets the NSLP/SBP WGR criteria, it will also comply with the CACFP WGR criteria.

**Yes:** If "Yes" is checked, the product's PFS must indicate the total grams of noncreditable grains in the "How many grams?" section or include a statement that the product does not exceed the applicable limit for each grain group, e.g., " $\leq 3.99$  grams" for groups A-G or " $\leq 6.99$  grams" for groups H-I. For examples of noncreditable grains, refer to section 3 of the CSDE's [Guide to Meeting the Whole Grain-rich Requirement for the Child and Adult Care Food Program](#).



# When Commercial Grain Products Require a PFS to Credit in the Child and Adult Care Food Program

If the product's ingredients statement contains more than one noncreditable grain before the statement "contains 2% or less," confirm with the manufacturer that the grams listed in part II include the combined weight of all noncreditable grains in the product's ingredients statement.

**Example:** A PFS indicates that the product contains 1 gram of noncreditable grains. The product's ingredients statement includes three noncreditable grains (modified cornstarch, wheat flour, and rice starch) listed before the statement "contains 2% or less." The CACFP facility should check with the manufacturer to verify that the 1 gram includes the combined weight of the three noncreditable grains. Alternatively, the CACFP facility can use the CACFP "Rule of Three" to review the product.

**No:** If "No" is checked, review the product's ingredients statement to determine if any noncreditable grains are listed.

- The PFS for Wheat Pancakes checks "No" to indicate that the Wheat Pancakes does not contain any noncreditable grains. The menu planner would need to check the ingredients statement to confirm this information.

The most common error on a manufacturer's PFS for commercial grain products is stating that the grain product does not contain any noncreditable grains but they are listed in the product's ingredients statement.

## D. Part III: "Indicate which Exhibit A 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 Chart 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.

- The PFS for Wheat Pancakes indicates group C, which is the correct group for pancakes.

# When Commercial Grain Products Require a PFS to Credit in the Child and Adult Care Food Program

## E. Part III chart, first column: “DESCRIPTION OF CREDITABLE GRAIN INGREDIENT”

Review the product’s ingredients statement to identify all creditable grains, i.e., 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](#).

- The PFS for Wheat Pancakes indicates two creditable grains: whole wheat flour and enriched flour. The menu planner would need to check the ingredients statement to confirm this information.

## F. Part III chart, second column: “GRAMS OF CREDITABLE GRAIN INGREDIENT PER PORTION”

Check that the PFS lists the grams of each creditable grain.

- The PFS for Wheat Pancakes indicates the grams of each creditable grain: 15 grams of whole wheat flour and 11 grams of enriched flour.

## G. 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 (E), based on the product’s Exhibit A grain group listed above the chart (D).

- **Groups A-G (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.
- **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, 1¼ cups for puffed cereals, and ¼ cup for granola) to credit as 1 oz eq. For guidance on crediting breakfast cereals, refer to the CSDE’s resource, [Crediting Breakfast Cereals in the Child and Adult Care Food Program](#).

The PFS for Wheat Pancakes uses the correct standard of 16 grams of creditable grains for the pancakes (group C).

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## H. Part III chart, fourth column: “CREDITABLE AMOUNT”

The “CREDITABLE AMOUNT” is the oz eq contribution of each ingredient. 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).

- The PFS calculations for Wheat Pancakes are correct.
  - **Whole wheat flour:** 15 grams divided by the creditable grains standard of 16 grams = 0.9375 oz eq.
  - **Enriched flour:** 11 grams divided by the creditable grains standard of 16 grams = 0.6875 oz eq.

## I. Part III chart, bottom of fourth column: “Total”

Check that the “Total” at the bottom of column 4 equals the sum of all creditable amounts.

- The calculation on the PFS for Wheat Pancakes is correct: 0.9375 oz eq of whole wheat flour plus 0.6875 oz eq of enriched flour = 1.625 oz eq.

## J. 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 ( $\frac{1}{4}$ ) oz eq. For example, 1.625 rounds down to 1.5, 1.49 and 1.27 round down to 1.25, and 1.24 rounds down to 1.

- The PFS rounding is correct: 1.625 rounds down to 1.5 oz eq.

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### K. “Total weight (per portion) of product as purchased” and “Total creditable amount 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 creditable amount of product per portion (oz eq) in this section is the same as the “Total Creditable Amount” (J) listed at the bottom of column 4 in the chart in part III.

- The rounding on the PFS for Wheat Pancakes is correct: The serving weight is listed as 1.75 ounces in both sections. The total creditable amount is listed as 1.5 oz eq in both sections.

### L. 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).

- The information on the PFS for Wheat Pancakes is correct: The serving weight is listed as 1.75 ounces in both sections. The crediting contribution is listed as 1.5 oz eq in both sections.

### M. 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.

- The PFS for Wheat Smile Pancake 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 (refer to “[Storing PFS forms](#)” in this document).

# When Commercial Grain Products Require a PFS to Credit in the Child and Adult Care Food Program

## Resources

### [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](https://portal.ct.gov/-/media/sde/nutrition/cacfp/crediting/accepting_processed_product_documentation_cacfp.pdf)

### [CACFP Best Practices](#) (USDA webpage):

<https://fns-prod.azureedge.us/cacfp/program-operator/best-practices>

### [Child Nutrition Programs: Tips for Evaluating a Manufacturer's Product Formulation Statement](#)

(USDA webpage):

<https://www.fns.usda.gov/cn/labeling/tips-evaluating-pfs>

### [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](https://portal.ct.gov/-/media/sde/nutrition/cacfp/crediting/credit_cereals_cacfp.pdf)

### [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](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](https://portal.ct.gov/-/media/sde/nutrition/cacfp/crediting/credit_whole_grains_cacfp.pdf)

### [Exhibit A Grains Tool of the Food Buying Guide](#) (USDA):

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

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

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

### [Food Buying Guide for Child Nutrition Programs](#) (USDA):

<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>

### [Grain Ounce Equivalents Chart for the Child and Adult Care Food Program](#) (CSDE):

[https://portal.ct.gov/-/media/sde/nutrition/cacfp/crediting/grain\\_oz\\_eq\\_cacfp.pdf](https://portal.ct.gov/-/media/sde/nutrition/cacfp/crediting/grain_oz_eq_cacfp.pdf)

### [Grains Component](#) (CSDE's Crediting Foods in the Child and Adult Care Food Program webpage):

<https://portal.ct.gov/sde/nutrition/crediting-foods-in-the-child-and-adult-care-food-program/grains>

# When Commercial Grain Products Require a PFS to Credit in the Child and Adult Care Food Program

## [Guide to Meeting the Whole Grain-rich Requirement for the Child and Adult Care Food Program](#)

(CSDE):

[https://portal.ct.gov/-/media/sde/nutrition/cacfp/crediting/wgr\\_requirement\\_cacfp.pdf](https://portal.ct.gov/-/media/sde/nutrition/cacfp/crediting/wgr_requirement_cacfp.pdf)

## [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](https://portal.ct.gov/-/media/sde/nutrition/cacfp/crediting/how_to_use_ounce_equivalents_chart_cacfp.pdf)

## [Product Formulation Statements](#) (CSDE's Crediting Documentation for the Child Nutrition Programs webpage):

<https://portal.ct.gov/sde/nutrition/crediting-documentation-for-the-child-nutrition-programs/product-formulation-statements>

## [Records Retention Requirements for the School Nutrition Programs](#) (CSDE):

[https://portal.ct.gov/-/media/sde/nutrition/nslp/records\\_retention\\_snp.pdf](https://portal.ct.gov/-/media/sde/nutrition/nslp/records_retention_snp.pdf)

## [USDA Memo SP 05-2025, CACFP 04-2025, and SFSP 02-2025: Guidance for Accepting Processed Product Documentation for Meal Pattern Requirements](#):

<https://www.fns.usda.gov/cn/labeling/guidance-accepting-processed-product-documentation>

## [What's in a Meal Module 8: Meal Pattern Documentation for Crediting Commercial Processed Products](#) (CSDE's Training Program, What's in a Meal: Meal Patterns for Grades K-12 in the School Nutrition Programs):

<https://portal.ct.gov/sde/nutrition/meal-pattern-training-materials#module8>

## When Commercial Grain Products Require a PFS to Credit in the Child and Adult Care Food Program

For more information, visit the CSDE's [Crediting Foods in the Child and Adult Care Food Program](#) webpage or contact the [CACFP staff](#) at the Connecticut State Department of Education, Bureau of Child Nutrition Programs, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841. This document is available at [https://portal.ct.gov/-/media/sde/nutrition/cacfp/crediting/when\\_commercial\\_grain\\_products\\_require\\_pfs\\_cacfp.pdf](https://portal.ct.gov/-/media/sde/nutrition/cacfp/crediting/when_commercial_grain_products_require_pfs_cacfp.pdf).



# When Commercial Grain Products Require a PFS to Credit in the Child and Adult Care Food Program

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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:

1. 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](mailto:program.intake@usda.gov)

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