Noncreditable Grains for the School Nutrition Programs and the Connecticut Nutrition Standards

This guidance assists school food authorities (SFAs) with determining if grain foods meet the noncreditable grains limit required by the crediting and whole grain-rich (WGR) criteria for the grains component of the U.S. Department of Agriculture's (USDA) meal patterns for grades K-12 in the National School Lunch Program (NSLP), School Breakfast Program (SBP), and Afterschool Snack Program (ASP) of the NSLP, and the Seamless Summer Option (SSO) of the NSLP; and the WGR criteria of the Connecticut Nutrition Standards (CNS) under Healthy Food Certification (HFC).

Contents

Overview of USDA and CNS Requirements for Noncreditable Grains 2

Required Limit for Noncreditable Grains 2

Noncreditable Grains 3

Ingredients that are Not Noncreditable Grains 4

When a PFS is Required for Commercial Grain Products 5

- Exceptions 5
- Verifying accuracy of PFS Forms 5

Resources 6



Noncreditable Grains for the School Nutrition Programs and the Connecticut Nutrition Standards

Noncreditable grains are grain ingredients that 1) do not meet the USDA's definition of creditable grains (whole grains, enriched grains, bran, and germ) and therefore do not contribute toward the grains component; and 2) do not meet the CNS WGR requirement for grain foods and therefore cannot be sold a la carte to students in HFC schools or served in the ASP. School food authorities (SFAs) must ensure that all commercial grain products and standardized recipes for grain foods made from scratch meet the applicable limit for noncreditable grains.

Overview of USDA and CNS Requirements for Noncreditable Grains

The USDA requires that all creditable grain foods (WGR and enriched) served in reimbursable NSLP and SBP meals and afterschool snacks for grades K-12 cannot exceed the limit for noncreditable grains. For detailed guidance on the requirements for noncreditable grains, refer to the CSDE's *Guide to Meeting the Whole Grain-rich Requirement for the Meal Patterns for Grades K-12 in the School Nutrition Programs*.

The CNS requires that all grain foods available for sale to students separately from reimbursable school meals (a la carte sales) and offered in the ASP must be WGR and must meet the limit for noncreditable grains. The CNS is required for all public schools that certify for the healthy food option of HFC under Section 10-215f of the Connecticut General Statutes.

Note: The preschool meal patterns do not require a limit for noncreditable grains, but grain products and standardized recipes must meet the preschool WGR and crediting criteria. For more information, refer to the CSDE's resource, *How to Identify Creditable Grains for the Preschool Meal Patterns of the School Nutrition Programs*, and visit the "Grains" section of the CSDE's Crediting Foods in School Nutrition Programs webpage.

Required Limit for Noncreditable Grains

Noncreditable grains must be less than 2 percent of the product formula, i.e., ¼ ounce equivalent (oz eq). To meet this limit, noncreditable grains cannot exceed:

- 3.99 grams per portion for foods in groups A-G; or
- 6.99 grams per portion for foods in groups H-I.

Groups A-I refer to the grain groups in the USDA's chart, *Exhibit A: Grain Requirements for Child Nutrition Programs* (known as Exhibit A). Exhibit A summarizes the required weight or volume that equals 1 oz eq for nine groups of creditable grain foods in the Child Nutrition Programs. The CSDE's *Grain Ounce Equivalents Chart for the School Nutrition Programs* specifies the Exhibit A oz eq that apply to the school nutrition programs.

Noncreditable Grains for the School Nutrition Programs and the Connecticut Nutrition Standards

Noncreditable Grains

The ingredients below count toward the limit for noncreditable grains. They must be included in the total weight of noncreditable grain ingredients for a commercial grain product or standardized recipe.

- **Corn** that is not whole grain, enriched, or nixtamalized *, e.g., cornmeal, corn flour, degermed corn, stone-ground corn, and yellow corn flour. **Note:** Corn flour, corn grits, and cornmeal are noncreditable grains unless they are whole grain, enriched, or nixtamalized. Nixtamalized corn ingredients credit as whole grains. Nixtamalization is the process of soaking and cooked dried corn in an alkaline (slaked lime) solution. A product formulation statement (PFS) may be required to determine if a corn ingredient is nixtamalized. For information on the PFS requirements, refer to the CSDE's resource, *Using Product Formulation Statements in the School Nutrition Programs*, and visit the "Product Formulation Statements" section of the CSDE's Crediting Documentation for the Child Nutrition Programs webpage.

- **Fiber**, e.g., corn fiber, soluble corn fiber, oat fiber, oat hull fiber, and soy fiber.

- **Flour** that not whole grain or enriched, e.g., durum flour, malted barley flour, fermented wheat flour, rice flour, semolina flour, stone-ground corn flour, white flour, and wheat flour.

- **Grits** that are not whole grain, enriched, or nixtamalized *, e.g., corn grits, durum grits, and barley grits.

- **Modified food starch**, e.g., modified cornstarch, modified rice starch, modified tapioca starch, and modified wheat starch.

- **Rice, white** that is not enriched.

- **Soy products**, e.g., soy flakes, soy fiber, and soy grits.

- **Starch**, e.g., cornstarch, cultured wheat starch, hydrolyzed starch, potato starch, rice starch, and tapioca starch.

- **Vegetable and legume flours**, e.g., chickpea flour, fava bean flour, pea flour, and potato flour.

This list is not all-inclusive.

Noncreditable Grains for the School Nutrition Programs and the Connecticut Nutrition Standards

Ingredients that are Not Noncreditable Grains

The ingredients below do not count toward limit for noncreditable grains and can be ignored.
Cellulose fiber

- Chicory extract
- Chicory root
- Citrus fiber
- Corn dextrin
- Fibersol
- Inulin
- Malt
- Malt powder
- Maltodextrin
- Pea fiber
- Powdered cellulose
- Short chain fructan (fiber)
- Soy flours, soy concentrates, and soy isolates
- Vital wheat gluten
- Wheat gluten

This list is not all-inclusive.

Noncreditable Grains for the School Nutrition Programs and the Connecticut Nutrition Standards

When a PFS is Required for Commercial Grain Products

A manufacturer's PFS is required for all commercial grain products that contain noncreditable grains unless they meet the exceptions below. The manufacturer's PFS must indicate the total grams of all noncreditable grains in one serving of the product or that the serving contains less than the required limit. SFAs must confirm that the total grams of noncreditable grains do not exceed the required limit for each type of grain product (refer to "Required Limit for Noncreditable Grains" in this document).

Exceptions

A PFS is not required for a commercial grain product if the noncreditable grains are listed in any of the following ways:

- after the statement, "contains 2% or less;"
- as part of a non-grain ingredient, such as a bagel that contains molasses powder made with wheat starch or a fruit pastry that contains jam filling made with modified food starch; or
- as part of the non-grain portion of a commercial combination food, such as modified food starch in the chicken portion of breaded chicken or wheat flour in the cheese filling of ravioli.

For additional guidance and examples, refer to the CSDE's resource, *When Commercial Grain Products Require a Product Formulation Statement to Credit in the School Nutrition Programs*, and section 3 of the CSDE's *Guide to Meeting the Whole Grain-rich Requirement for the Meal Patterns for Grades K-12 in the School Nutrition Programs*.

Verifying accuracy of PFS Forms

The USDA requires that SFAs must verify PFS forms for accuracy prior to purchasing, serving, and claiming the grain product in reimbursable meals and afterschool snacks. If the manufacturer will not supply a PFS or the PFS does not provide the appropriate documentation, the product cannot credit in the school nutrition programs. For more information, refer to USDA Memo SP 05-2025, CACFP 04-2025, and SFSP 02-2025: *Guidance for Accepting Processed Product Documentation for Meal Pattern Requirements* and the CSDE's resources, *Using Product Formulation Statements in the School Nutrition Programs* and *When Commercial Grain Products Require a Product Formulation Statement to Credit in the School Nutrition Programs*.

Noncreditable Grains for the School Nutrition Programs and the Connecticut Nutrition Standards

Resources

Connecticut Nutrition Standards (CSDE webpage):
https://portal.ct.gov/sde/nutrition/connecticut-nutrition-standards

Crediting Documentation for the Child Nutrition Programs (CSDE webpage):
https://portal.ct.gov/sde/nutrition/crediting-documentation-for-the-child-nutrition-programs

Evaluating Foods for CNS Compliance (CSDE's Connecticut Nutrition Standards webpage):
https://portal.ct.gov/sde/nutrition/connecticut-nutrition-standards/evaluating-foods-for-cns-compliance

Grains Component (CSDE's Crediting Foods in School Nutrition Programs webpage):
https://portal.ct.gov/sde/nutrition/crediting-foods-in-school-nutrition-programs/grains

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

Healthy Food Certification (CSDE webpage):
https://portal.ct.gov/sde/nutrition/healthy-food-certification

Standardized Recipes (CSDE's Crediting Documentation for the Child Nutrition Program webpage):
https://portal.ct.gov/sde/nutrition/crediting-documentation-for-the-child-nutrition-programs/standardized-recipes

USDA Memo SP 05-2025, CACFP 04-2025, and SFSP 02-2025: Guidance for Accepting Processed Product Documentation for Meal Pattern Requirements:
https://www.fna.usda.gov/cn/labeling/guidance-accepting-processed-product-documentation

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.fna.usda.gov/cn/crediting-coconut-hominy-corn-masa-and-masa-harina-child-nutrition-programs

Using Child Nutrition (CN) Labels in the School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/cn_labels_snp.pdf

Using Product Formulation Statements in the School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/product_formulation_statements

Noncreditable Grains for the School Nutrition Programs and the Connecticut Nutrition Standards

When Commercial Grain Products Require a Product Formulation Statement to Credit in the School Nutrition Programs (CSDE): https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/when_commercial_grain_products_require_pfs_snp.pdf

Whole Grain Resource for the National School Lunch and Breakfast Programs (USDA): https://www.fns.usda.gov/tn/whole-grain-resource-national-school-lunch-and-breakfast-programs

For more information, visit the CSDE's Crediting Foods in School Nutrition Programs webpage or contact the school nutrition programs 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/nslp/crediting/noncreditable_grains_snp.pdf.

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.

CONNECTICUT
Education

Noncreditable Grains for the School Nutrition Programs and the Connecticut Nutrition Standards

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:

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

This institution is an equal opportunity provider.