

When Commercial Grain Products Require a Product Formulation Statement to Credit in the School Nutrition Programs

School food authorities (SFAs) must be able to document that commercial grain products meet the crediting requirements of the U.S. Department of Agriculture’s (USDA) meal patterns for grades K-12 and preschoolers (ages 1-4) in the National School Lunch Program (NSLP), School Breakfast Program (SBP), Seamless Summer Option (SSO) of the NSLP, and Afterschool Snack Program (ASP) of the NSLP. 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 crediting or whole grain-rich (WGR) criteria for the school nutrition programs.

The meal patterns for the school nutrition programs have different crediting requirements for the grains component, and different WGR requirements and crediting criteria. This document provides guidance on when a PFS for a commercial grain product is required for each school nutrition program.



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Overview of Crediting Requirements for Grains

To credit as the grains component, grain foods must contain creditable grains and meet the applicable meal pattern requirements for each school nutrition program. 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). The different crediting requirements, WGR requirements, and WGR criteria for the meal patterns for grades K-12 and preschoolers are summarized below.

Crediting requirements for grades K-12 in the NSLP and SBP

To credit as the grains component in the [NSLP and SBP meal patterns for grades K-12](#), grain foods must be WGR or enriched and cannot exceed the limit for noncreditable grains. Cooked and ready-to-eat (RTE) breakfast cereals must be WGR, enriched, or fortified, and cannot exceed the limit for noncreditable grains. At least 80 percent of the weekly grains offered at lunch and breakfast must be WGR. For guidance on the WGR criteria, refer to the Connecticut State Department of Education's (CSDE) guide, [Meeting the Whole Grain-rich Requirement for the NSLP and SBP Meal Patterns for Grades K-12](#). For information on crediting grains in the NSLP and SBP meal patterns, visit the “Grains Component” section of the CSDE's [Crediting Foods in School Nutrition Programs](#) webpage.

Preschoolers in the NSLP, SBP, and ASP

The [preschool meal patterns](#) for the NSLP, SBP, and ASP are the same as the meal patterns for the Child and Adult Care Food Program (CACFP). To credit as the grains component in the preschool meal patterns, grain foods must be WGR or enriched. Cooked and RTE breakfast cereals must be WGR, enriched, or fortified and cannot exceed 6 grams of sugars per dry ounce. The preschool meal patterns require at least one serving 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 CACFP](#). For information on crediting grains in the preschool meal patterns, visit the “Grains Component” section of the CSDE's [Meal Patterns for Preschoolers in School Nutrition Programs](#) webpage.

Crediting requirements for grades K-12 in the ASP

To credit as the grains/breads component in the [ASP meal pattern for grades K-12](#), grain foods must be enriched. The ASP meal pattern for grades K-12 does not require WGR foods. The CSDE encourages school food authorities (SFAs) to include WGR foods in ASP menus. For guidance on identifying whole and enriched grains, refer to the CSDE's resources, [Crediting Whole Grains in the National School Lunch Program and School Breakfast Program](#), [Crediting Enriched Grains in the National School Lunch Program and School Breakfast Program](#), and [Crediting Breakfast Cereals for Grades K-12 in the National School Lunch Program and School Breakfast Program](#). For information on crediting grains in the ASP meal pattern for grades K-12, visit the “Grains/Breads” section of the CSDE's [ASP](#) webpage.

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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 Child Nutrition Programs. The information on PFS forms can vary among manufacturers because the USDA does not approve or monitor PFS forms for compliance with the product's actual formulation or the stated meal pattern contribution.

To be acceptable as crediting documentation for the grains component of the meal patterns for the school nutrition programs, a PFS must contain the required information in the USDA's *Product Formulation Statement for Documenting Grains in Child Nutrition Programs*. The PFS must indicate the product's specific crediting information, including: 1) the weight (grams) of each creditable grain per serving; 2) 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 3) if applicable, the combined weight of any noncreditable grains per serving.

SFAs must verify the accuracy of the PFS before including the commercial grain product in reimbursable meals and ASP snacks, and request supporting documentation from the manufacturer if needed. SFAs must maintain PFS forms and crediting documentation on file. The CSDE will review this information during the Administrative Review of the school nutrition programs.

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 meal patterns for school nutrition programs.

For more information on PFS forms, refer to the CSDE's resources, *Using Product Formulation Statements in the School Nutrition Programs* and *Accepting Processed Product Documentation in the National School Lunch Program and School Breakfast Program*, and the USDA's *Tips for Evaluating a Manufacturer's Product Formulation Statement*.

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Overview of Grain Products that Require a PFS

Table 1 summarizes when a PFS for a commercial grain product is required for each school nutrition program. Not all situations apply to each school nutrition program because:

- the WGR criteria for the NSLP and SBP meal patterns for grades K-12 are different from the WGR criteria for the NLSP, SBP, and ASP preschool meal patterns; and
- the ASP meal pattern for grades K-12 does not have a WGR requirement.

The specific considerations and examples for each type of grain product that requires a PFS begin on page 5. These considerations are different for commercial grain products (such as breads, rolls, muffins, and waffles) and combination foods (such as pizza, lasagna, and breaded chicken nuggets).

Guidance on how to review a grain product's PFS begins on page 14. For additional assistance with reviewing PFS forms for grains, contact the CSDE's [school nutrition programs staff](#).

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



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Table 1. When a PFS is required for commercial grain products

| Type of product | Applies to |
|---|--|
| 1. The first ingredient is not a creditable grain, but the product contains more than one creditable grain. | <input checked="" type="checkbox"/> NSLP and SBP meal patterns for grades K-12 <input checked="" type="checkbox"/> NLSP, SBP, and ASP preschool meal patterns <input checked="" type="checkbox"/> ASP meal pattern for grades K-12 |
| 2. <i>Applies only to WGR foods:</i> The first ingredient is not a whole grain, but the product contains more than one whole grain. | <input checked="" type="checkbox"/> NSLP and SBP meal patterns for grades K-12 <input checked="" type="checkbox"/> NLSP, SBP, and ASP preschool meal patterns <input type="checkbox"/> ASP meal pattern for grades K-12 |
| 3. <i>Applies only to WGR foods:</i> The first ingredient is a whole grain, and the product contains two or more enriched grains | <input checked="" type="checkbox"/> NSLP and SBP meal patterns for grades K-12 <input checked="" type="checkbox"/> NLSP, SBP, and ASP preschool meal patterns <input type="checkbox"/> ASP meal patterns for grades K-12 |
| 4. <i>Applies only to WGR foods:</i> The first ingredient is a flour blend of whole and enriched flour. | <input checked="" type="checkbox"/> NSLP and SBP meal patterns for grades K-12 <input checked="" type="checkbox"/> NLSP, SBP, and ASP preschool meal patterns <input type="checkbox"/> ASP meal patterns for grades K-12 |
| 5. The product contains noncreditable grains that are <i>not</i> listed in any of the following ways: after the statement, “contains 2% or less;” in a non-grain ingredient; or in the non-grain portion of a combination food. | <input checked="" type="checkbox"/> NSLP and SBP meal patterns for grades K-12 <input type="checkbox"/> NLSP, SBP, and ASP preschool meal patterns <input type="checkbox"/> ASP meal pattern for grades K-12 |
| 6. A combination food that contains a grain portion does not have a Child Nutrition (CN) label. | <input checked="" type="checkbox"/> NSLP and SBP meal patterns for grades K-12 <input checked="" type="checkbox"/> NLSP, SBP, and ASP preschool meal patterns <input checked="" type="checkbox"/> ASP meal pattern for grades K-12 |
| 7. The manufacturer claims that the product’s serving size is less than the required weight or volume in the USDA’s chart, <i>Exhibit A: Grain Requirements for Child Nutrition Programs</i> (Exhibit A). | <input checked="" type="checkbox"/> NSLP and SBP meal patterns for grades K-12 <input checked="" type="checkbox"/> NLSP, SBP, and ASP preschool meal patterns <input checked="" type="checkbox"/> ASP meal pattern for grades K-12 |
| 8. The product is not listed in the USDA’s Exhibit A chart. | <input checked="" type="checkbox"/> NSLP and SBP meal patterns for grades K-12 <input checked="" type="checkbox"/> NLSP, SBP, and ASP preschool meal patterns <input checked="" type="checkbox"/> ASP meal pattern for grades K-12 |

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Guidance for Grain Products That Require a PFS

The specific considerations 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*, whole grains are indicated in *green italics*, and noncreditable grains are indicated in *red italics*.

1

The first ingredient is not a creditable grain, but the product contains more than one creditable grain.


- **Grain product:** To credit as the grains component, the PFS must indicate that the combined weight of all creditable grains is the greatest ingredient by weight.
- **Combination food:** To credit the grain portion as the grains component, the 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: corn muffin (grain product) | |
|--|--|
| <p>Ingredients: Water, sugar, <i>whole-grain corn flour</i>, <i>whole-wheat flour</i>, <i>enriched flour (wheat flour, niacin, iron, thiamin mononitrate, riboflavin, folic acid)</i>, eggs, soybean/canola oil, milk whey, leavening (sodium acid pyrophosphate, baking soda), vital wheat gluten, sugar, nonfat milk, guar gum.</p> <p>The first ingredient after water is sugar. However, the product contains three creditable grains, including two whole grains (whole-grain corn flour and whole-wheat flour) and enriched flour.</p> |  |
| Meal pattern | PFS required? |
| NSLP and SBP: grades K-12 | Yes. To credit as the grains component, the PFS must indicate that the combined weight of the three creditable grains is more than the weight of the sugar. |
| ASP: grades K-12 | Yes. To credit as the grains/breads component, the PFS must indicate that the combined weight of the three creditable grains is more than the weight of the sugar. |
| NSLP and SBP: preschool | Yes. To credit as the grains component, the PFS must indicate that the combined weight of the three creditable grains is more than the weight of the sugar. |


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2 *Applies only to WGR foods:* The first ingredient is not a whole grain, but the product contains more than one whole grain.

- **Grain product:** To credit as a WGR food, the PFS must indicate that the combined weight of all whole grains is the greatest ingredient by weight.
- **Combination food:** To credit the grain portion as a WGR food, the 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: Oat bread (grain product) | |
|--|---|
| <p>Ingredients: <i>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.</i></p> <p>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).</p> |  |
| Meal pattern | PFS required? |
| NSLP and SBP: grades K-12 | Yes. To credit as a WGR food, the PFS must indicate that the combined weight of the two whole grains is equal to or more than the weight of the enriched flour. |
| ASP: grades K-12 | No. The WGR requirement does not apply to the ASP. This food credits as the grains/breads component. |
| NSLP and SBP: preschool | Yes. To credit as a WGR food, the PFS must indicate that the combined weight of the two whole grains is equal to or more than the weight of the enriched flour. |


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| Example: Breaded chicken nuggets (combination food) | |
|--|--|
| <p>Ingredients: Chicken, water, salt, and natural flavor. Breaded with: <i>enriched flour (wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid)</i>, water, <i>white whole-wheat flour</i>, salt, <i>whole-grain corn flour</i>, dried onion, dried garlic, dried yeast, brown sugar, extractives of paprika, and spices. Breading set in vegetable oil.</p> <div style="float: right; text-align: center;">  </div> <p style="margin-top: 20px;">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).</p> | |
| Meal pattern | PFS required? |
| NSLP and SBP: grades K-12 | Yes. To credit the breading as a WGR food, the 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. |
| ASP: grades K-12 | No. The WGR requirement does not apply to the ASP. The breading credits as the grains/breads component. |
| NSLP and SBP: preschool | Yes. To credit the breading as a WGR food, the 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. |

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3 *Applies only to WGR foods:* The first ingredient is a whole grain, and the product contains two or more enriched grains.

- **Grain product:** To credit as a WGR food, the PFS must indicate that the weight of the whole grain is equal to or more than the combined weight of the enriched grains.
- **Combination food:** To credit the grain portion as a WGR food, the 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: Wheat roll (grain product) | |
|--|---|
| <p>Ingredients: <i>Whole-wheat flour, enriched flour (wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid), enriched corn meal (corn meal, ferrous sulfate, niacin, thiamin mononitrate, riboflavin, folic acid), yeast, wheat gluten,</i> contains less than 2% of each of the following: soybean oil, sugar, salt, calcium propionate (preservative), baking soda.</p> <p>The first ingredient is whole-wheat flour. The product contains two enriched grains (enriched flour and enriched corn meal).</p> |  |
| Meal pattern | PFS required? |
| NSLP and SBP: grades K-12 | Yes. To credit as a WGR food, the 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. |
| ASP: grades K-12 | No. The WGR requirement does not apply to the ASP. This food credits as the grains/breads component. |
| NSLP and SBP: preschool | Yes. To credit as a WGR food, the 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. |

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4 *Applies only to WGR foods:* The first ingredient is a flour blend of whole and enriched flour, e.g., “flour blend (whole-wheat flour, enriched flour).”

To credit as a WGR food, the PFS must indicate one of the following:

- the whole grain content is at least 8 grams per ounce equivalent (oz eq) for groups A-G of Exhibit A; or
- 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.


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

| Example: Blueberry muffin (grain food) | |
|--|---|
| <p>Ingredients: Water, flour blend (<i>whole grain wheat flour, enriched bleached flour [wheat flour, niacin, iron, thiamine mononitrate, riboflavin, folic acid]</i>), sugar, egg, soybean/canola oil, blueberries, leavening (baking soda, sodium aluminum phosphate, monocalcium phosphate), milk whey, wheat gluten, salt.</p> <p>The first ingredient after water is a flour blend of whole grain wheat flour and enriched bleached flour.</p> |  |
| Meal pattern | PFS required? |
| NSLP and SBP: grades K-12 | Yes. To credit as a WGR food, the 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). |
| ASP: grades K-12 | No. The WGR requirement does not apply to the ASP. This food credits as the grains/breads component. |
| NSLP and SBP: preschool | Yes. To credit as a WGR food, the 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). |


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5 *Applies only to the NSLP and SBP meal patterns for grades K-12 foods:* The product contains noncreditable grains that are not listed in any of the following ways: after the statement, “contains 2% or less;” in a non-grain ingredient; or in the non-grain portion of a combination food.

The PFS must indicate that the combined weight of noncreditable grains does not exceed 3.99 grams per portion for groups A-G (such as breads, muffins, pancakes, and crackers) or 6.99 grams per portion for foods in group H (such as rice, pasta, quinoa, and cooked breakfast cereals, e.g., oatmeal) and group I (ready-to-eat (RTE) breakfast cereals). Examples of noncreditable grains include oat fiber, corn fiber, wheat starch, corn starch, and modified food starch (including potato, legume, and other vegetable flours). For a detailed list, refer to section 3 of the CSDE’s guide, *Meeting the Whole Grain-rich Requirement for the National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12*.

| Example: Enriched cinnamon roll (grain food) | |
|---|---|
| <p>Ingredients: Water, <i>enriched flour (wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, enzyme, folic acid)</i>, brown sugar, corn oil, nonfat dry milk, yeast, cinnamon, <i>soy flakes, modified food starch</i>, salt, wheat gluten and 2% or less of each of the following: corn syrup solids, vanilla flavor [propylene glycol, water, sodium benzoate (as a preservative)].</p>  | |
| <p>The first ingredient after water is enriched flour. This product contains two noncreditable grains (soy flakes and modified food starch) listed before the statement, “2% or less of each of the following.”</p> | |
| Meal pattern | PFS required? |
| NSLP and SBP: grades K-12 | Yes. To credit as an enriched grain, the PFS must indicate that the combined weight of the two noncreditable grains does not exceed 3.99 grams per portion (groups A-G). |
| ASP: grades K-12 | No. The limit for noncreditable grains does not apply to enriched grains in the ASP meal pattern. This food credits as the grains/breads component. |
| NSLP and SBP: preschool | No. The limit for noncreditable grains does not apply to enriched grains in the preschool meal patterns. This food credits as an enriched grain in the preschool meal patterns. |

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| Example: WGR breadsticks (grain food) | |
|--|---|
| <p>Ingredients: <i>White whole-wheat flour</i>, water, <i>wheat starch</i>, <i>enriched flour</i> (<i>wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid</i>), salt, contains 2% or less of the following: <i>yellow corn flour, cornstarch</i>, dried onion, pepper, sugar, extractives of paprika, and spices.</p> <div style="text-align: right; margin-top: 10px;">  </div> <p>The first creditable grain ingredient is a whole grain (white whole-wheat flour). The other creditable grain ingredient is enriched wheat flour.</p> <p>This product contains one noncreditable grain (wheat starch) listed before the statement, “2% or less of each of the following,” and two noncreditable grains listed after this statement (yellow corn flour and cornstarch).</p> | |
| Meal pattern | PFS required? |
| NSLP and SBP: grades K-12 | Yes. To credit as a WGR food, the PFS must indicate that the wheat starch does not exceed 3.99 grams per portion (groups A-G). The other two noncreditable grains (yellow corn flour and cornstarch) do not count toward the limit for noncreditable grains because they are listed after “contains 2% or less of the following.” |
| ASP: grades K-12 | No. The WGR requirement and the limit for noncreditable grains do not apply to the ASP meal pattern. This food credits as the grains/breads component in the ASP. |
| NSLP and SBP: preschool | Yes. This product does not meet the preschool WGR “Rule of Three” WGR criteria ¹ because the second grain ingredient (wheat starch) is not creditable. To credit as a WGR food, the PFS must indicate that the whole grain (white whole-wheat flour) is the primary grain ingredient. |
| <p>¹ The “Rule of Three” WGR criteria apply only to the preschool meal patterns. A food in groups A-E of the USDA’s Exhibit A chart is 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. For more information, refer to the CSDE’s Guide to Meeting the Whole Grain-rich Requirement for the Child and Adult Care Food Program.</p> | |

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A PFS is not required if the noncreditable grains in a commercial product 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; and
- 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, refer to “When to ignore noncreditable grains” in section 6 of the CSDE’s guide, *Meeting the Whole Grain-rich Requirement for the National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12*.

6

A commercial combination food that contains a grain portion (such as pizza or breaded chicken nuggets) does not have a Child Nutrition (CN) label.

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

For additional guidance on CN labels, refer to the CSDE’s resource, *Using Child Nutrition (CN) Labels in the School Nutrition Programs*, and visit the “Crediting Commercial Processed Products” section of the CSDE’s [Crediting Foods in School Nutrition Programs](#) webpage.



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7

The manufacturer claims that the product's serving size is less than the required weight or volume in the USDA's *Exhibit A: Grain Requirements for Child Nutrition Programs* (Exhibit A chart). For example, a manufacturer claims a $\frac{3}{4}$ -ounce enriched bagel credits as 1 ounce equivalent of the grains component.

To credit as the grains component, the 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 and SBP meal patterns for grades K-12, the PFS must also indicate the total weight of noncreditable grains.

The required amounts for the grains component in the USDA's Exhibit A chart are not the same for all Child Nutrition Programs because the meal patterns are different. The Exhibit A chart includes grain oz eq (which apply to the NSLP and SBP meal patterns for grades K-12 and preschoolers, and the ASP meal pattern for preschoolers) and grains/breads servings (which apply to the ASP pattern for grades K-12). Refer to the CSDE's documents below for the required quantities for each meal pattern and grade group.

- **NSLP and SBP meal patterns for grades K-12:** The CSDE's resource, *Grain Ounce Equivalents for Grades K-12 in the National School Lunch Program and School Breakfast Program*, indicates the applicable weight or volume required for each grain group to credit as 1 oz eq of the grains component.
- **ASP meal pattern for grades K-12:** The CSDE's resource, *Grains/Breads Servings for Grades K-12 in the Afterschool Snack Program*, indicates the applicable weight or volume required for each grain group to credit as 1 serving of the grains/breads component.
- **NSLP and SBP meal patterns for preschoolers:** The CSDE's resource, *Grain Ounce Equivalents for the National School Lunch Program and School Breakfast Program Preschool Meal Patterns*, indicates the applicable weight or volume required for each grain group to credit as $\frac{1}{2}$ oz eq of the grains component (the required amount for preschoolers).

8

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

To credit as the grains component, the 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 and SBP meal patterns for grades K-12, the PFS must also indicate the total weight of noncreditable grains.

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Reviewing a Grain Product's PFS

SFAs are responsible for verifying the accuracy of the commercial grain product's PFS and maintaining documentation records on file. This section provides guidance on how to evaluate a commercial grain product's PFS for accuracy.

The example in this section is a PFS that documents the **grain oz eq** contribution for the NSLP and SBP meal patterns for grades K-12 and the NLSP, SBP, and ASP preschool meal patterns. The required grains/breads servings for the ASP meal pattern for grades K-12 are the same as the Summer Food Service Program (SFSP) and are determined using a different USDA PFS (*Product Formulation Statement for Documenting Grains/Breads Servings in the Child and Adult Care Food Program, Summer Food Service Program, and NSLP Afterschool Snacks*). For an example of how to review the USDA PFS for grains/breads serving, refer to the CSDE's resource, *When Commercial Grain Products Require a Product Formulation Statement to Credit in the Summer Food Service Program*.

Note: SFAs may choose to use oz eq for grains served in the ASP. Since oz eq are slightly larger than grains/breads servings, a commercial product that complies with the required oz eq will also meet the ASP meal pattern for grades K-12. For example, a roll must weigh 28 grams to credit as 1 oz eq and 25 grams to credit as 1 grains/breads serving. Using oz eq for the ASP snacks for grades K-12 simplifies menu planning and provides consistency for school 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 (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 crediting or WGR criteria for the grains component of the school meal patterns.

USDA
United States Department of Agriculture
Food and Nutrition Service

**Product Formulation Statement for Documenting Grains
in Child Nutrition Programs**
(Crediting Standards Based on Grams of Creditable Grain (ounce equivalent))

Program operators should include a copy of the label for the purchased product, package in addition to the following information on each food report for an article containing grain or grain products submitted to the system to ensure the crediting method that fits their specific menu planning needs.

Product Name: _____ Code No.: _____
Manufacturer: _____ Servings Size: _____
(See weight/volume may be used to calculate creditable grams)

I. Does the product meet the whole grain-rich criteria? Yes No

II. Does the product contain rice/creditable grains? Yes No How many grams? _____
(Products with more than 0.25 ounce equivalent for rice or 0.88 grams for Groups A-D or 0.99g for Groups E and F of rice/creditable grains do not credit toward the grain requirements for school meals.)

III. Use Exhibit A: Grain Requirements for Child Nutrition Programs in the Food Buying Guide for Child Nutrition Programs (FBG) to determine if this product fits into Group A-D (Baked goods, Group E (Cereal grains) or Group F (Rye bran/flat cereals). (Cereals and flatbreads are used to calculate the grams creditable toward creditable grains. Groups A-D use the criterion of 1/2 oz (1/4g or 2/8g) per 1/2 oz (1/4g or 2/8g) in volume. The standard of 1/2 oz (1/4g or 2/8g) is used for volume.)
Indicate which Exhibit A Group (A-B) the product belongs:

| DESCRIPTION OF CREDITABLE GRAIN INGREDIENT* | GRAMS OF CREDITABLE GRAIN INGREDIENT PER PORTION† | GRAM STANDARD OF CREDITABLE GRAINS PER 1/2 OZ (1/4g or 2/8g)‡ | CREDITABLE AMOUNT† x § |
|---|---|---|------------------------|
| A | B | A x B | |
| | | | |
| | | | |
| | | | |
| Total | | | |
| Total Creditable Amount† | | | |

* Creditable grains are by Program. See the FBG for specific Program requirements.
† Serving size: 1/2 oz of creditable grains or formula, except cereals, that grains must be converted to grams.
‡ Standard grams of creditable grains for the corresponding Group in Exhibit A.
§ Total Creditable Amount will be rounded down to the nearest quantity (1/2 oz) or eq. Do not round up.

Tell: weight (per portion) of product purchased _____ oz eq
Tell: contribution of product (per portion) _____ oz eq

I certify that the above information is true and correct and that a _____ ounce portion of this product is creditable for serving purposes, as specified. (Enter "0" if this information cannot be determined.)
I certify that the above information is true and correct and that a _____ ounce portion of this product is creditable for serving purposes, as specified. (Enter "0" if this information cannot be determined.)
I certify that the above information is true and correct and that a _____ ounce portion of this product is creditable for serving purposes, as specified. (Enter "0" if this information cannot be determined.)
I certify that the above information is true and correct and that a _____ ounce portion of this product is creditable for serving purposes, as specified. (Enter "0" if this information cannot be determined.)
I certify that the above information is true and correct and that a _____ ounce portion of this product is creditable for serving purposes, as specified. (Enter "0" if this information cannot be determined.)

Signature: _____ Title: _____
Printed Name: _____ Date: _____ Phone No. (Area): _____

September 2020

When Commercial Grain Products Require a Product Formulation Statement to Credit in the School Nutrition Programs

- **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 information on the required quantities for each grain group, refer to the CSDE's resources, *Grain Ounce Equivalents for Grades K-12 in the National School Lunch Program and School Breakfast Program*, *Grain Ounce Equivalents for the NSLP and SBP Preschool Meal Patterns*, and *Grains/Breads Servings for Grades K-12 in the ASP*. For guidance on how to determine a grain product's meal pattern contribution, refer to the CSDE's resources, *Calculation Methods for Grain Ounce Equivalents for Grades K-12 in the National School Lunch Program and School Breakfast Program*, *Calculation Methods for Grain Ounce Equivalents for Preschoolers in the National School Lunch Program and School Breakfast Program*, and *Calculation Methods for Grains/Breads Servings for Grades K-12 in the Afterschool Snack Program*.

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 must be 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. It indicates the amount needed to provide the creditable amount stated on the PFS.
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;

When Commercial Grain Products Require a Product Formulation Statement to Credit in the School Nutrition Programs

- 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 (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.

SFAs 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 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.

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Table 1. Sample PFS for grams of creditable grains



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.

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

B Manufacturer: ABC Bread Company Serving Size: 2 pancakes, 50 grams (1.75 ounces)
(raw dough weight may be used to calculate creditable grains)

B I. Does the product meet the whole grain-rich criteria? Yes No

C II. Does the product contain non-creditable grains? Yes No How many grams? **D**
(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 non-creditable grains do not credit toward the grains requirement for school meals.)

E III. Use Exhibit A: Grain Requirements for Child Nutrition Programs in the *Food Buying Guide for Child Nutrition Programs* (FBG) 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.)*

E Indicate which Exhibit A Group (A-I) the product belongs: C

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

* Creditable grains vary by Program. See the FBG for specific Program requirements.
¹ (Serving size) X (% of creditable grains in formula); serving sizes other than grams must be converted to grams.
² Standard grams of creditable grains from the corresponding Group in Exhibit A.
³ Total Creditable Amount must be rounded **down** to the nearest quarter (0.25) oz eq. Do **not** round up.

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

Total contribution of product (per portion) 1.5 oz eq

M 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. I further certify that non-creditable 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 non-creditable grains do not credit toward the grains requirement for school meals.

N John Smith Signature Title President
John Smith Printed Name Date 02/01/2023 Phone Number (123) 456-7890

When Commercial Grain Products Require a Product Formulation Statement to Credit in the School Nutrition Programs

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 green circles refer to the applicable sections of the sample PFS for ABC Bread Company’s Wheat Smile Pancakes in table 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. |
| B | 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 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). <ul style="list-style-type: none">For this example, the 15 grams of whole-wheat flour is more than the 11 grams of enriched flour. |
| C | Part II: “Does the product contain noncreditable grains” If “No” is checked, review the product’s ingredients statement to determine if any noncreditable grains are listed. For examples of noncreditable grains, refer to section 3 of the CSDE’s guide, <i>Meeting the Whole Grain-rich Requirement for the National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12</i> . <div data-bbox="363 1192 1321 1331" style="border: 1px solid black; padding: 10px; margin-top: 10px;">The most common error on PFS forms for grain products is incorrectly stating that the product does not contain any noncreditable grains.</div> |

When Commercial Grain Products Require a Product Formulation Statement to Credit in the School Nutrition Programs

D

Part II: “How many grams”

If “Yes” is checked (C), the PFS must indicate the total grams of noncreditable grains (D) or include a statement that the product does not exceed the applicable limit for each grain group, e.g., “≤3.99 grams” for groups A-G or “≤6.99 grams” for groups H-I. For examples of noncreditable grains, refer to section 3 of the CSDE’s guide, *Meeting the Whole Grain-rich Requirement for the National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12*.

- For this example, the product does not contain any noncreditable grains.

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 (D) 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 SFA should check with the manufacturer to verify that the 1 gram includes the combined weight of the three noncreditable grains.

E

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 Grades K-12 in the National School Lunch Program and School Breakfast 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.

F

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 National School Lunch Program and School Breakfast Program* and *Crediting Enriched Grains in the National School Lunch Program and School Breakfast Program*.

When Commercial Grain Products Require a Product Formulation Statement to Credit in the School Nutrition Programs

G

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.

H

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 (E).

- **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.

I

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 (F), divide the “GRAMS OF CREDITABLE GRAIN INGREDIENT PER PORTION” in column 2 (G) by the “GRAM STANDARD OF CREDITABLE GRAIN PER OZ. EQUIVALENT” in column 3 (H).

- 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.

When Commercial Grain Products Require a Product Formulation Statement to Credit in the School Nutrition Programs

J

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.

K

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 ($\frac{1}{4}$) 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.

L

“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.

M

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.

When Commercial Grain Products Require a Product Formulation Statement to Credit in the School Nutrition Programs

N

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.

SFAs must maintain PFS forms and supporting information on file to document meal pattern compliance for auditing purposes.

Resources

Accepting Processed Product Documentation in the National School Lunch Program and School Breakfast Program (CSDE):

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

Crediting Breakfast Cereals for Grades K-12 in the National School Lunch Program and School Breakfast Program (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/Credit_Cereals_SNP_grades_K-12.pdf

Crediting Enriched Grains in the National School Lunch Program and School Breakfast Program (CSDE):

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

Crediting Whole Grains in the National School Lunch Program and School Breakfast Program (CSDE):

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

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

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

Food Buying Guide Exhibit A Grains Tool (USDA):

<https://www.fns.usda.gov/tn/food-buying-guide-interactive-web-based-tool>

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_GrainsYieldTable.pdf

When Commercial Grain Products Require a Product Formulation Statement to Credit in the School Nutrition Programs

Grain Ounce Equivalents for Grades K-12 in the National School Lunch Program and School Breakfast Program (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/Grain_Oz_Eq_SNP_grades_K-12.pdf

Grains Component for Grades K-12 (CSDE's Crediting Foods in School Nutrition Programs webpage):

<https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-School-Nutrition-Programs/Documents#Grains>

How to Use the Grain Ounce Equivalents Chart for the National School Lunch Program and School Breakfast Program (CSDE):

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

Meeting the Whole Grain-rich Requirement for the NSLP and SBP Meal Patterns for Grades K-12 (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/WGR_Requirement_SNP_grades_K-12.pdf

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

Resources for the School Meal Patterns for Grades K-12 (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/MealPattern/Resources_School_Meal_Patterns_grades_K-12.pdf

Tips for Evaluating a Manufacturer's Product Formulation Statement (USDA):

<https://www.fns.usda.gov/sites/default/files/resource-files/manufacturerPFStipsheet.pdf>

USDA Memo SP 30-2012: Grain Requirements for the National School Lunch Program and School Breakfast Program:

<https://www.fns.usda.gov/school-meals/grain-requirements-national-school-lunch-program-and-school-breakfast-program>

Using Product Formulation Statements in the School Nutrition Programs (CSDE):

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

When Commercial Grain Products Require a Product Formulation Statement to Credit in the School Nutrition Programs

What's in a Meal Module 6: Meal Pattern Documentation (CSDE's Training Program, What's in a Meal: National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12):

<https://portal.ct.gov/SDE/Nutrition/Meal-Pattern-Training-Materials>

What's in a Meal Module 11: Grains Component (CSDE's Training Program, What's in a Meal: National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12):

<https://portal.ct.gov/SDE/Nutrition/Meal-Pattern-Training-Materials>

What's in a Meal Module 12: Whole Grain-rich (WGR) Requirement (CSDE's Training Program, What's in a Meal: National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12):

<https://portal.ct.gov/SDE/Nutrition/Meal-Pattern-Training-Materials>

What's in a Meal Module 13: Grain Ounce Equivalents (CSDE's Training Program, What's in a Meal: National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12):

<https://portal.ct.gov/SDE/Nutrition/Meal-Pattern-Training-Materials>

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>

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For more information, visit the “[Grains Component](#)” section of 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/When_Commercial_Grain_Products_Require_PFS_SNP.pdf.

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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

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