




STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Sponsors of School Child Nutrition Programs

FROM: John Frassinelli, Chief 
Bureau of Health/Nutrition, Family Services and Adult Education

DATE: April 11, 2014

SUBJECT: Operational Memorandum #22-14
Evaluating Products for Compliance with the Whole Grain-rich Criteria for School Nutrition Programs

The U.S. Department of Agriculture (USDA) regulations for the National School Lunch Program (NSLP) and School Breakfast Program (SBP) require that for school year 2013-14, at least half of the grains offered in the NSLP and SBP must be whole grain-rich (WGR). Effective July 1, 2014, all grains must be WGR. The Connecticut State Department of Education's (CSDE) [operational memorandum 22-12](#) dated May 3, 2012, explains the requirements for grains including the implementation of ounce equivalents and definition of WGR products. The information below provides additional clarification regarding the WGR requirements and how to evaluate grain products for compliance.

For a product to meet the USDA's WGR definition, it must meet the three criteria below.

1. The product contains **at least 50 percent** whole grains by weight.
2. Any remaining grain ingredients in the product must be **enriched**.
3. If the product contains any **noncreditable grains**, they must be present at **levels less than two percent** ($\frac{1}{4}$ ounce equivalent) of the product formula. To meet this limit, the combined total of all noncreditable grains cannot exceed 3.99 grams for groups A-G (baked goods) or 6.99 grams for group H (cereal grains) and group I (ready-to-eat breakfast cereals). **If noncreditable grains exceed these amounts, the entire product is considered noncreditable, even if the product meets the first two criteria above.**

Please note that these WGR criteria have been in place since July 1, 2012, when implementation of the new NSLP meal pattern began, as required by the Healthy, Hunger-Free Kids Act of 2010. The USDA has recently provided additional clarification regarding noncreditable grains.

During administrative reviews of the NSLP, the CSDE school nutrition staff often observe that school food authorities (SFAs) are not reviewing noncreditable grain content when determining whether to use grain products as part of school meals. **Effective July 1, 2014, non-WGR grain products do not meet the USDA requirements for the grains component of reimbursable school meals.** Therefore, it is critical that SFAs review the package labels or product formulation statements to ensure that all grain products for school meals meet the WGR requirements.

The CSDE's handout, [Criteria for Whole Grain-rich Foods](#), provides guidance to help SFAs evaluate grain products and determine whether they meet the WGR requirements, **including the**

limit for noncreditable grains. The WGR evaluation process includes the three steps below.

1. Determine if whole grains are at least 50 percent of the product's total weight.
2. Determine if all other grain ingredients in the product are enriched.
3. Determine if the product contains noncreditable grains, and if so, whether their combined weight exceeds the specified limit.

SFAs should carefully review the information in this handout to ensure that all steps are followed for each grain product used as part of reimbursable school meals.

In addition, effective July 1, 2014, the [Connecticut Nutrition Standards](#) apply the WGR requirements to all grain products sold separately from reimbursable meals. Public school districts participating in Healthy Food Certification (HFC) under [Section 10-215f](#) of the Connecticut General Statutes must use the same three steps to determine if grain products sold a la carte meet the Connecticut Nutrition Standards.

To be sold a la carte in HFC districts, a WGR product must also meet all nutrient standards, e.g., calories, fat, saturated fat, trans fat, sodium and sugars. Grain products that are WGR and meet the nutrient standards are listed on the CSDE's [List of Acceptable Foods and Beverages](#), a brand-specific list of foods that meet the Connecticut Nutrition Standards and beverages that meet the requirements of [Section 10-221q](#) of the Connecticut General Statutes.

Questions may be directed to:

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JF:sff

Attachment

This is a numbered Operational Memorandum that contains important program information. Please read carefully and retain in a binder for future reference. Operational Memoranda are posted on the Connecticut State Department of Education's [Child Nutrition Web site](#).