

Updated CACFP Meal Pattern Requirements FAQs

Kansas State Department of Education
Child Nutrition & Wellness



Purpose of the Update

- Align the CACFP meal pattern with the DGA
- Address the current health status of children and adults
- Enhance the nutritional quality of meals and snacks
- Help children develop healthy eating habits
- Safeguard the wellness of adult participants

Updated meal patterns for CACFP operators went into effect on October 1, 2017.



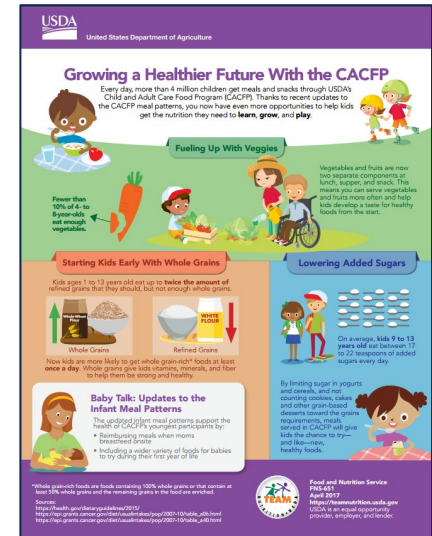
Transition Period – Fiscal Year 2018

- From October 1, 2017 - September 30, 2018, CNP operators must be making a good faith effort to comply with the updated meal pattern requirements; however, if violations are observed:
 - Technical assistance will be provided in lieu of fiscal action
 - CNP operators will not be found seriously deficient
- Immediate fiscal action will be taken if a meal is completely missing one or more of the required food components.



Resources

- CACFP Meal Standards webpage
 - <http://www.fns.usda.gov/cacfp/meals-and-snacks>
- CACFP Meal Pattern Training Tools
 - <https://www.fns.usda.gov/tn/cacfp-meal-pattern-training-tools>
- Menu Planning & Production Record Resources
 - <https://cnw.ksde.org/cacfp/cacfp-administrative-handbook/chapters/chapter-4-meal-guidelines/menu-planning-production-records>





Infant Meal Pattern

Question – Are products and/or recipes labeled “CACFP Approved” creditable in the CACFP?

Answer – Use of the term “CACFP Approved” or other marketing materials language should not be used for determining crediting of any product as USDA does not “approve” any products or Product Formulation Statements (PFS) for crediting in CNP. USDA does not endorse the term “CACFP Approved.” All food served in CACFP must be evaluated by the menu planner. If a menu planner needs assistance in crediting a food, contact KSDE, CNW for assistance.



Question – If parents provide breastmilk and another component, can the center or provider still claim that infant’s meals?

Answer – If a parent chooses to supply expressed breastmilk, the center or day care home must provide all the other components in order for the meal to be claimed.



Question – If a parent supplies an infant formula that is not iron-fortified (“low-iron”), would serving this product require a medical statement to be creditable towards a reimbursable infant meal?

Answer – Yes. Infant formulas that are not iron-fortified are generally not creditable in the CACFP. However, infant formulas that are not iron-fortified may be creditable towards a reimbursable meal if the substitution is supported by a medical statement. The statement must be submitted and kept on file by the center or day care home.



Question – If a parent chooses to provide infant formula and pre-mixes it at home, how is the center or day care home supposed to know if it is iron-fortified?

Answer – If a parent or guardian declines the iron-fortified infant formula that the center or day care home offers and chooses to provide their own infant formula, it is the responsibility of the center or day care home to inform the parent or guardian that they must provide formula that is creditable. A center or day care home may choose to have a form that indicates the parent or guardian declined the offered infant formula and that they will provide either breastmilk or an infant formula that is iron-fortified and is regulated by FDA. Or, a center or day care home may request the infant formula label to determine if it is iron-fortified. However, this documentation is not a Federal requirement.



Question – If a 1-year-old child is still being breastfed and the parent is only able to provide 2 fluid ounces of expressed breastmilk, can 2 fluid ounces of whole unflavored milk be served as a supplement to meet the minimum milk requirement?

Answer – Yes. If a parent chooses to breastfeed their 1-year-old child, the required minimum fluid milk serving size still must be met. If a parent is unable to provide enough expressed breastmilk to meet the fluid milk requirement, then whole unflavored milk must be served alongside the breastmilk to the child to make up the difference and meet the minimum milk requirement. FNS encourages centers and day care homes to talk to parents or guardians about supplementing breastmilk with whole milk prior to doing so. The two milks do not need to be mixed into the same cup. Please note, in this situation the center or day care home must provide all other required meal components in order for the meal to be reimbursable.



Question – If a center or day care home is unable to provide a private place for mothers to breastfeed and a mother chooses to breastfeed in her car, is that meal still reimbursable?

Answer – Yes. If a mother chooses to breastfeed her infant in her car, on the grounds of the center or home, the meal could still be claimed for reimbursement.

If the mother chooses to leave the premises to breastfeed her infant, the meal would not be reimbursable.



Question – Can a provider, or any other staff member of a child care center or day care home, breastfeed her own infant on-site and claim the meal for reimbursement? If yes, does the staff member have to be “on the clock”?

Answer – Yes. Any staff member of a child care center or day care home, may breastfeed her infant on-site and the center or day care home may claim the meal for reimbursement if the infant is enrolled at the center or day care home.

Whether a provider or other staff member is “on the clock” or not when she breastfeeds her infant is a business decision to be made by the center or day care home.



Question – If an infant does not finish the required minimum serving size of expressed breastmilk or formula offered to him or her, is the meal still reimbursable?

Answer – Yes. As long as the infant is offered the minimum required serving size of expressed breastmilk or iron-fortified infant formula the meal is reimbursable.

In particular, some infants that are regularly breastfed may consume less than the minimum serving size of breastmilk per feeding. In these situations, infants may be offered less than the minimum serving size of breastmilk and additional breastmilk must be offered at a later time if the infant will consume more.



Question – How should meals be documented when a mother directly breastfeeds her infant on site?

Answer – There are various ways to document a meal when a mother directly breastfeeds her infant on-site. Centers and day care homes must document if the infant is served breastmilk or infant formula to demonstrate compliance with the meal pattern requirements. But, centers and day care homes do not need to document the delivery method of breastmilk (e.g., breastfed on-site or expressed breastmilk in a bottle). Therefore, a center or day care home may simply indicate that an infant was offered breastmilk. Another option for indicating an infant was breastfed on-site is to write “breastfed” or “mom” on the menu or meal count form. When an infant is breastfed on site, the quantity of breastmilk the infant is served does not need to be documented.



Question – How can providers thaw frozen breastmilk at a child care site?

Answer – Providers may thaw the frozen container of breastmilk in the refrigerator, under warm running water, or in a container of warm water. Providers should write the date and time that the milk was thawed on the bottle or container. The oldest breastmilk should be thawed first, using a first-in-first-out approach. Thawed breastmilk should be refrigerated and used within 24 hours. Once the thawed breastmilk is at room temperature, it should be used within 2 hours. Leftover breastmilk should be discarded after 2 hours.

Breastmilk should never be thawed at room temperature or thawed by mixing with warm breastmilk. Breastmilk should also never be heated in boiling water or in a microwave.



Questions – If frozen breastmilk is thawed in the refrigerator and it must be used within 24 hours, when do you start counting the 24 hours?

Answer – According to the Centers for Disease Control (CDC), the 24-hour clock begins when the breastmilk is completely thawed, not from the time it was removed from the freezer. Providers should make note of the date and time that the breastmilk was thawed on the bottle or container. Breastmilk should never be refrozen after it has thawed.



Question – Can solid foods be served to infants younger than 6 months of age?

Answer – Yes. Meals containing solid foods are reimbursable when the infant is developmentally ready to accept them, even if the infant is younger than 6 months of age. A written note from a parent or guardian stating the infant should be served solid foods is recommended as a best practice but is not required. Infants develop at different rates meaning some infants may be ready to consume solid foods before 6 months of age and others may be ready after 6 months of age.



Question – What documentation is required when solid foods are served prior to 6 months of age?

Answer – Centers and day care homes must keep records of menus and indicate on the menu what solid foods are served to infants that are developmentally ready for solid foods. Otherwise, there are no additional Federal documentation requirements for serving solid foods prior to 6 months of age.

Child care providers may use the [For Parents: What Is Your Baby Eating? Let Us know! handout](#) found in the *Feeding Infants in the CACFP guide* to assist with these types of conversations. As a reminder, these are sample communication tools, not required documentation.

See additional information on slide 40.



Question – If an infant is just starting to be introduced to solid foods, does the center or day care home have to serve that solid food at every meal where the component is required?

Answer – It depends. Solid foods are introduced gradually, which means that it may be appropriate to serve the solid food only once per day and then gradually increase the number of feedings per day. The infant does not need to be offered a solid food component that is part of every meal pattern, such as vegetable and fruit, until the infant has established a tolerance for that solid food component at multiple feedings per day.



Question – What does it mean to feed an infant in a way that is “consistent with the infant’s eating habits”?

Answer – Infants do not typically eat on a strict schedule and do not necessarily eat at traditional breakfast, lunch, or supper times. Rather, it is best to feed infants when they show signs of being hungry. Because of an infant’s varied eating pattern, centers and day care homes should be mindful of what the infant eats over the course of the entire day versus each individual feeding. As long as all the required food components (i.e., breastmilk and/or infant formula and the solid foods the infant is developmentally ready to accept) are offered over the course of the entire day, they may be counted towards reimbursable meals. Infant meals must not be disallowed due solely to the fact that foods are served outside of established meal time periods.

For example, if an infant was breastfed at home right before arriving at the center or day care home, the infant may not be hungry for the breakfast meal when he or she first arrives. The center or day care home may offer the meal to the infant later in the morning when the infant is hungry and still claim the breakfast meal. As another example, if an infant who is developmentally ready to eat pureed vegetables is not hungry for the pureed vegetables at lunch, then the pureed vegetables may be offered at another time during the day and the lunch meal may still be claimed for reimbursement.



Question – What should a center or day care home do if they feel an infant is developmentally ready to start eating solid foods but the infant’s parents or guardians do not want the infant to be introduced to solid foods?

Answer – If a center or day care home believes that an infant is developmentally ready to start eating solid foods, they should engage in a conversation with the infant’s parents or guardians.

The provider can tell the parents or caregiver about the signs they have seen indicating the infant is ready to start solid foods and ask if they would like solid foods to be served while the infant is in day care.

If the parent or guardian does not want their infant to be served solid foods while the infant is in care, the center or day care home should respect that decision and should not serve the infant solid foods. In this situation, as long as the center or day care home continues to serve the infant the required amount of breastmilk or iron-fortified infant formula, then the meals are still reimbursable.



Question – Are foods that are considered to be a major food allergen or foods that contain these major food allergens allowed for infant meals?

Answer – Foods that contain one or more of the **nine** major food allergens identified by the FDA (milk, egg, fish, shellfish, tree nuts, peanuts, wheat, soybeans, **and sesame**), and are appropriate for infants, are allowed and can be part of a reimbursable meal. The American Academy of Pediatrics recently concluded that there is no current convincing evidence that delaying the introduction of foods that are considered to be major food allergens has a significant positive effect on the development of food allergies.

To align with scientific recommendations, FNS is allowing whole eggs to credit towards the meat alternate component of the updated infant meal patterns. Under the updated infant meal pattern requirements, the whole egg (yolk and white) must be served to the infant in order to be creditable.

It is good practice to check with parents or guardians of all infants to learn about any concerns of possible allergies and their preference on how solid foods are introduced.



Question – Does a child have to be served iron-fortified cereal as part of the updated infant meal pattern requirements?

Answer – No, the infant meal pattern includes iron-fortified cereal as one of many potential components and is not specified as a component that is always required to be served. It is possible that an infant never eats iron-fortified infant cereal because the parents prefer to feed him/her whole foods or table foods rather than infant-specific foods. **The only infant-specific food that is required to be served to an infant is breastmilk or an approved formula.**



Question – What is the minimum amount of iron an infant cereal must contain in order to be considered “iron-fortified”?

Answer – Infant cereal must contain some iron in order to be creditable in the CACFP. However, there is no minimum standard. Centers and day care homes should look at an infant cereal’s ingredient list to see if it contains iron. As long as one of the ingredients listed is “iron”, “ferric fumarate”, “electrolytic iron”, or “iron (electrolytic)”, then the cereal is iron-fortified. As an additional guide, centers and day care homes may refer to any State agency’s WIC approved infant cereal list to find a dry infant cereal that contains iron. Please note, WIC approved infant cereals are not an exhaustive list of infant cereals that contain iron.



Question – Can infant cereal be served in a bottle to infants?

Answer – No. Serving infant cereal in a bottle to infants is not allowed. Neither the infant cereal nor the infant breastmilk or formula in the bottle may be claimed for reimbursement when they are served in the same bottle, unless it is supported by a medical statement.



Question – What are “ready-to-eat” cereals?

Answer – Ready-to-eat cereals, or boxed cereals, are a type of breakfast cereal that can be eaten as sold and is typically fortified with vitamins and minerals. Some examples of ready-to-eat cereals are puffed rice cereals and whole grain O-shaped cereal. Only ready-to-eat cereals, as developmentally appropriate, are allowed at snack under the infant meal pattern.

Oatmeal, steel cut oats, grits (enriched), and instant cereals are **not** ready-to-eat cereals.



Question – Are grain-based infant puffs creditable in CACFP?

Answer – Grain-based infant puffs are considered a ready-to-eat cereal and need to be assessed individually because even within the same manufacturer they may contain different ingredients – some creditable, some not creditable. Ready-to-eat cereals (including grain-based infant puffs) must meet the cereal sugar limit (6 g of sugar per one dry ounce) and be made from enriched or whole grain meal or flour, or be fortified, to be creditable in the CACFP.



Question – If an infant rejects food they once ate, does the center or day care home need to offer something else in order to claim the meal for reimbursement?

Answer – It depends on the infant’s current eating pattern. Solid foods are introduced to infants gradually. New foods may be introduced one at a time over the course of a few days and an infant’s eating pattern may change. For example, an infant may eat mashed banana one week and not the next week. Centers and day care homes must follow the eating pattern of individual infants. Meals should not be disallowed simply because one food was offered one day and not the next if it is consistent with the infant’s eating pattern. However, in this example, if an infant no longer eats mashed banana, but is eating another fruit or vegetable, the center or day care home must offer the other fruit or vegetable to the infant at meals when vegetables and/or fruit are required.

It is important to remember that it is normal for infants to refuse new foods. Child care providers are encouraged to continue providing opportunities for infants to try new foods and get used to different flavors and textures. If the infant refuses the food, that is okay. The meal is still reimbursable.



Question – Are cereals with honey creditable in the infant meal pattern?

Answer – Honey, and foods that contain honey, should never be fed to babies less than 1 year of age. Honey may contain substances that can cause “infant botulism,” a serious type of food-related illness that can make a baby very sick. Honey should not be added to food, water, or formula that is fed to babies, or used as an ingredient in cooking or baking (e.g., yogurt with honey, peanut butter with honey, baked goods that contain honey). This also applies to commercially prepared foods such as cereals sweetened with honey or honey graham crackers.



Question – Is there a whole grain-rich requirement for infants?

Answer – No. The requirement to serve at least one whole grain-rich food per day is only required under the CACFP children and adult meal patterns.



Question – Are cooked grains, such as rice, quinoa, and pasta, creditable grains in the infant meal pattern?

Answer – While these grains are options for older children, cooked grains are not creditable towards the infant meal pattern. However, an infant may be served some mixed dishes that contain foods that do not credit towards the infant meal pattern, such as rice, quinoa, or pasta. The American Academy of Pediatrics recommends introducing single-ingredient foods to babies first before giving a mix of foods, or combination foods.



Question – Are baby pouch food products allowed in CACFP?

Answer – Commercially prepared infant foods packaged in a jar, plastic container, pouch or any other packaging are creditable in CACFP. The way a food is packaged does not impact whether a food is creditable or not.



Question – Are **store-bought** mixed or combination infant foods reimbursable in the infant meal pattern?

Answer – Combination baby foods are foods that include a mixture of two or more foods, such as meat and vegetables. Under certain circumstances, these foods may be counted towards a reimbursable infant meal or snack.

The American Academy of Pediatrics recommends introducing single ingredient foods to infants first, one at a time. This will help to monitor if an infant has an allergic reaction.

Once developmentally ready, infants benefit from being introduced to a variety of food textures, aromas, and flavors, including mixed dishes. When considering food combinations, be sure that the infant has been introduced to all ingredients and that the food is the appropriate texture to prevent choking. Be aware that some mixed dishes may contain foods that do not credit towards the infant meal pattern, such as rice or pasta.

Since infants eating combination baby foods have already shown that they are developmentally ready and accepting of each food in the combination baby food, the combination baby food must contain the full required amount of the meal component or other foods must be offered to meet the full required amount of the meal component. While the full amount must be offered to the infant, the infant does not have to eat all of it.



Question – Is pasteurized processed cheese allowable as part of the infant meal pattern?

Answer – Cheese food and cheese spread are not allowed in the updated infant meal patterns (they are allowable for children and adult meals), but pasteurized processed cheese may be part of a reimbursable infant, child, or adult meal. If the product label states “pasteurized processed cheese” without “food” or “spread” next to it, it is creditable for infants, children, and adults. If the product label list “food” or “spread” as part of the product name, it is not creditable for infants.



Question – Is yogurt creditable in the infant meal pattern?

Answer – Yes. Yogurt is an allowable meat alternate for infants consuming solid foods. All yogurts served in the CACFP, including those served to infants, must contain no more than 23 grams of sugar per 6 ounces. Please note, though, that soy yogurt is not allowed in the infant meal pattern.



Question – Are yogurt melts and yogurt blends creditable in the CACFP?

Answer – Yogurt melts are NOT creditable in the CACFP as they do not meet the standard of identity for yogurt. Likewise, products labeled as “yogurt blends” are not the same as yogurt. Proper documentation from a manufacturer, such as a Product Formulation Statement (PFS), would be required to determine the amount of yogurt and other creditable ingredients in the blends.



Question – Are chicken nuggets creditable in the infant meal pattern?

Answer – Processed meats and poultry such as chicken nuggets, hot dogs, infant meat and poultry sticks (not dried or semi-dried, not jerky), fish sticks, and sausage may be part of a reimbursable meal. A Child Nutrition Label or product formulation statement is required for these foods to determine the number of pieces per serving and document that portions meet the meal pattern requirements. Consistent with the child and adult meal patterns, hot dogs, infant meat and poultry sticks, and sausage must be free of byproducts, cereals, and extenders in order to be creditable in the infant meal pattern.

These foods were not previously creditable towards the infant meal patterns due to the risk of choking. If served, these foods can, and must, be prepared in a way to reduce choking. Always cut foods to no more than ½ inch in size to avoid choking.



Question – Can reimbursable infant meals and snacks contain foods that are deep-fat fried on-site?

Answer – No, under the updated CACFP meal patterns for all age groups, including infants, foods that are deep-fat fried on-site cannot contribute towards a reimbursable meal. Centers and day care homes may still purchase foods pre-fried, flash-fried, or par-fried by the manufacturer, such as fish sticks. But those foods must be reheated using a method other than deep-fat frying.



Question – If a physician or State recognized medical authority prescribes whole cow’s milk or a fluid milk substitute as an alternative for breastmilk or infant formula for an infant (birth through 11 months of age), is the meal reimbursable?

Answer – For children younger than 12 months of age, cow’s milk or a fluid milk substitute may be served as a alternative for breastmilk and/or infant formula, and be part of a reimbursable meal, **only** if the substitution is supported by a medical statement signed by a licensed physician or a State recognized medical authority. The statement must be submitted and kept on file by the center or day care home.



Question – How should centers and day care homes document infant menus when the items each infant eats varies so much?

Answer – Centers and day care homes must keep records of menus. One option for demonstrating the various foods infants are served is to have a standard menu for all the infants in care and adapt the menu for each infant based on what each infant is offered. For example, a center could use a template that outlines the meal pattern requirements in one column and space in another column for the provider to fill-in what components are served to each infant.

An infant that has not yet started solid foods would receive a serving size of 0 tablespoons. An infant that has just started eating a certain vegetable may receive 1 tablespoon. Once an infant has been regularly eating a specific solid food, they would receive 2 tablespoons. In all of these instances, the meal would be reimbursable.



Questions – At what age should those monitoring compliance with the infant meal pattern requirements (monitors) expect to see infants being served all the solid meal components for each meal and snack?

Answer – Minimum serving sizes are listed as ranges for infants because not all babies are ready to eat solid foods at the same time. An infant that has not yet started solid foods would receive a serving size of 0 tablespoons. An infant that has just started eating a certain vegetable may receive 1 tablespoon. Once an infant has been regularly eating a specific solid food, they would receive 2 tablespoons. In all of these instances, the meal would be reimbursable. Monitors should engage in a conversation with the center or day care home provider to learn more about the infants' eating habits and ensure that the meal being served is appropriate for that infant's developmental readiness.



Questions – The Crediting Handbook for the Child and Adult Care Food Program, the Food Buying Guide for Child Nutrition Programs, and other Team Nutrition Resources provide minimum serving sizes for different meal components to count towards the meal pattern requirements. For example, to credit towards the vegetable component, a minimum serving size of an 1/8 cup of vegetable is required. Do these minimum serving sizes apply to the infant meal pattern?

Answer – No. Minimum creditable amounts do not apply to the infant meal pattern. Minimum serving sizes are listed as ranges for infants because not all babies are ready to eat solid foods at the same time. An infant that has not yet started solid foods would receive a serving size of 0 tablespoons. An infant that has just started eating a certain vegetable may receive 1 tablespoon. Once an infant has been regularly eating a specific solid food, they would receive 2 tablespoons. In each of these examples, the meal would be reimbursable.





Child and Adult Meal Pattern

Question – Can children 13 and older now be claimed on the CACFP?

Answer – While the updated CACFP meal pattern requirements has a new age group for children 13-18, that does **not** mean that day care home providers or child care centers may now claim meals for children 13 years and older. The new age group was added for the At-Risk meal component and for Emergency shelters only. Children age 18 and under can be claimed as part of At-Risk meals and emergency shelters.

Day care home providers and child care centers **continue** to be able to serve and claim meals to children age 12 and under, children aged 15 and under who are children of migrant workers, or persons with disabilities (persons of any age who have one or more disabilities who are enrolled in a day care home serving a majority of persons who are age 18 and under).



Question – If an at-risk afterschool program only serves an Offer vs Serve (OVS) supper and offers two choices of grains at the meal, do both of the grains need to be whole grain-rich? Could the center just make sure there is enough of the whole grain-rich item for all children to select?

Answer – If an at-risk afterschool center or adult day care center only serves one meal per day and chooses to use OVS, all the grain items offered must be whole grain-rich. While OVS allows a variety of food items from one component to be served, a center that only serves one meal per day cannot offer one whole grain-rich grain and one enriched grain. This ensures greater consumption of whole grains if a child or adult chooses to take a grain item.



Question – Can a center or day care home use food or beverages as a reward or punishment in certain circumstances?

Answer – Centers and day care homes may not use a reimbursable meal, or components of a reimbursable meal, as a way to reward or punish a child or adult participant under any circumstance. For example, if a day care home is helping to potty train a child in care, they cannot withhold a reimbursable meal or snack from the child as a punishment. Additionally, the day care home cannot offer the child a certain food or beverage as reward for potty training. For example, the day care home cannot say the child will get juice at snack if he or she uses the bathroom.





Fluid Milk

Question – Can a center or day care home add flavored syrup or flavored milk powder to unflavored milk and serve it to children 1 through 5 years old?

Answer – No, adding syrup or flavored powder to unflavored milk adds sugar to the unflavored milk and turns the beverage into flavored milk. Flavored milk is not allowed as part of a reimbursable meal for children 1 through 5 years old starting October 1, 2017.



Question – Must non-dairy beverages served to children 1 through 5 be unflavored?

Answer – Yes, fluid milk and non-dairy beverages that are served to children 1 through 5 years of age must be unflavored starting October 1, 2017.



Question – If 1 and 2 year old children sit together for the same meal, must they be served different types of milk?

Answer – Yes, starting October 1, 2017, children 2 years old and older must be served unflavored low-fat or unflavored fat-free milk and children 1 year of age must be served unflavored whole milk. The fluid milk requirements are based on age to ensure that children are receiving the nutrients they need for growth and development. Centers and day care homes must ensure that children of various ages seated together receive the appropriate type of milk.



Question – If a mother breastfeeds her 13 month old, or older child at the center or day care home, is the meal reimbursable?

Answer – Breastmilk is an allowable substitute for fluid milk for children of any age. When a mother breastfeeds her child on-site, the center or day care home should count it towards the meal that was closest to when the mother breastfed the child no matter the age of the child. When a parent chooses to provide breastmilk, the center or day care home must supply all the other required components in order for the meal to be reimbursable.



Question – If a 1 year old child is still being breastfed and the mother is only able to provide 2 fluid ounces of expressed breastmilk, can 2 fluid ounces of whole unflavored milk be served as a supplement to meet the minimum milk requirement?

Answer – Yes. If a mother chooses to breastfeed her 1 year old child the required minimum fluid milk serving size still must be met. If a mother is unable to provide enough expressed breastmilk to meet the fluid milk requirement, then whole unflavored milk may be served alongside the breastmilk to the child to make up the difference and meet the minimum milk requirement. The two milks do not need to be mixed into the same cup. Centers and day care homes should talk to parents or guardians about supplementing breastmilk with whole milk prior to doing so.



Question – Are meals served to children 12 months and older reimbursable if they contain infant formula?

Answer – Yes. For a period of one month, when children are 12 to 13 months of age, meals that contain infant formula may be reimbursed to facilitate the weaning from infant formula to cow's milk. While weaning, infants should be presented with both types of foods at the same meal service to gradually encourage acceptance of the new food. Breastmilk continues to be considered an acceptable fluid milk substitute for children over 12 months of age, and a medical statement is not required.

Meals containing infant formula that are served to children 13 months old and older are reimbursable when it is supported by a medical statement signed by a licensed physician or a State recognized medical authority.



Question – Are providers required to identify milk type on the menu? This could clutter a menu when a provider serves a variety of ages since 1 year olds are required to receive whole milk while 2 and older are served skim or 1%.

Answer – Yes, this is not a new requirement of the updated meal pattern but rather continuing the requirements of the current Code of Federal Regulations 7 CFR 226.20(a)(1).





Food Preparation

Question – Are vended meals with deep-fried foods allowed?

Answer – While deep-fat frying is not allowed as a way of preparing foods on-site, vended meals are not considered to be prepared on-site. A center may claim a vended meal that contains deep-fried foods as long as the deep-fried food was prepared by the vendor off-site.



Question – Can meals that are prepared in a central, satellite kitchen contain deep-fried foods?

Answer – Meals served at centers where the meal is prepared at a central, satellite kitchen cannot contain a deep-fried food and be claimed for reimbursement. However, CACFP centers with meals prepared at a central, satellite kitchen may still purchase and serve foods that are pre-fried, flash-fried, or par-fried by the manufacturer, such as fried fish sticks or potato wedges. A central, satellite kitchen must reheat these foods using a method other than deep-frying.



Question – Can a provider or center deep-fry foods the night before and then reheat these foods using a method other than deep-frying?

Answer – No, a provider or center cannot deep-fry foods at another time and then reheat those foods using a method other than deep-frying. Deep-fat frying is not allowed as a way of preparing foods on-site no matter the time of day in which the food was prepared.



Question – Are combination peanut butter and jelly jars creditable as part of the meal pattern?

Answer – Determining how much peanut butter was in each serving would be difficult; therefore, a product formulation statement would be needed. It would be easier to keep the peanut butter and jelly in separate containers.





Grains

Question – Must centers and day care homes first determine if a grain is creditable before determining if a grain is whole grain-rich?

Answer – Yes, centers and day care homes must first determine if a grain is creditable before using one of the six options to determine if a grain is whole grain-rich. In order to be creditable, an enriched grain or whole grain must be the first ingredient or second after water.



Question – How will centers and day care homes identify whole grain-rich foods?

Answer – Centers and day care homes can identify whole grain-rich foods using **any ONE** of the following six options:

- 1) Product is found on any State agency's WIC approved whole grain food list.
- 2) Product is labeled “whole wheat” and has a Standard of Identity issued by the U.S. FDA.
- 3) Product includes one of the FDA approved whole grain health claims on its packaging.
- 4) The food meets the whole grain-rich criteria under the NSLP.
- 5) The food meets FNS' Rule of Three, a three-step process for identifying whole grain-rich products in the CACFP.
- 6) Proper documentation from a manufacturer or a standardized recipe demonstrates that whole grains are the primary grain ingredient by weight.



Question – What is an FDA Standard of Identity?

Answer – An FDA Standard of Identity is a set of rules for what a certain product (like whole wheat bread) must contain or may contain to legally be labeled with that product name. FDA provides Standards of Identity for certain whole wheat bread products and certain whole wheat pasta products. Products that **do not** have an FDA Standard of Identity, such as crackers, tortillas, bagels, and biscuits, must be evaluated for whole grain-rich creditability for CACFP using one of the other five methods.



Question – What breads have an FDA Standard of Identity?

Answer – Only breads with these exact product names conform to an FDA Standard of Identity and can be considered whole grain-rich:

- Whole wheat bread
- Entire wheat bread
- Graham bread
- Whole wheat rolls
- Entire wheat rolls
- Graham rolls
- Whole wheat buns
- Entire wheat buns
- Graham buns



Question – What pastas have an FDA Standard of Identity?

Answer – Only pastas with these exact product names conform to an FDA Standard of Identity and can be considered whole grain-rich:

- Whole wheat macaroni product
- Whole wheat macaroni
- Whole wheat spaghetti
- Whole wheat vermicelli



Question – What items are not considered to have an FDA standard of identity?

Answer – Grain products labeled as “whole wheat” that do not have an FDA standard of Identity, such as crackers, tortillas, bagels and biscuits, must be evaluated for whole grain-rich creditability for CACFP using one of the five other methods.

Be aware that manufacturers may label their products with terms that are similar to, but slightly different from, FDA Standard of Identity terms. Frequently encountered terms include “whole grain,” “made with whole grains,” or “contains whole grains.” These terms do **not** indicate an FDA Standard of Identity for whole wheat products. Foods with these terms must be evaluated for whole grain-rich creditability for CACFP using one of the other five methods.



Question – Are the FDA whole grain health claims sufficient documentation to demonstrate that a food is whole grain-rich?

Answer – FNS is allowing the FDA whole grain health claims to be sufficient documentation to demonstrate compliance with the whole grain-rich criteria in the CACFP only. The FDA whole grain health claims are not sufficient documentation to demonstrate a grain is whole grain-rich in the School Meal Programs. The product must include one of the following FDA approved whole-grain health claims on its packaging, exactly as written:

- “Diets rich in whole grain foods and other plant foods and low in total fat, saturated fat, and cholesterol may reduce the risk of heart disease and some cancers.” or
- “Diets rich in whole grain foods and other plant foods, and low in saturated fat and cholesterol, may help reduce the risk of heart disease.”



Question – What is the *Rule of Three*?

Answer – FNS developed the Rule of Three in recognition that CACFP operators purchase food differently than School Meal Program operators, as CACFP operators often shop in retail environments and may not have access to manufacturers' product formulation statements or products specifically formulated for School Meal Programs.

To meet the *Rule of Three* as a whole grain-rich product, the first ingredient (or second after water) must be whole grain, and the next two grain ingredients (if any) must be whole grains, enriched grains, bran or germ. Any grain derivatives (by-products of grains) may be disregarded. Any non-creditable grain ingredients (e.g. flours that are not enriched or whole) that are labeled as 2 percent or less of product weight are considered insignificant and may also be disregarded.



Question – How do program operators apply the *Rule of Three* to mixed dishes?

Answer – When applying the *Rule of Three* to the grain portion of mixed dishes, such as pizza crusts and tortillas for burritos, the first grain ingredient must be whole grain and the next two grain ingredients (if any) must be whole grains, enriched grains, bran or germ.



Question – How do program operators apply the *Rule of Three* to breakfast cereals?

Answer – If the first grain ingredient is a whole grain and the cereal is fortified, the product meets the whole grain-rich criteria. In this situation, the second and third grain ingredients, if any, do not need to be considered.



Question – If an English muffin’s ingredient list says: “whole wheat flour, water, enriched wheat flour, wheat starch, yeast, sugar, salt”, does it pass the *Rule of Three* and meet the whole grain-rich criteria?

Answer – This product is creditable as a whole grain-rich product in the CACFP using the *Rule of Three* because the first ingredient (whole wheat flour) is a whole grain, and the second grain ingredient (enriched wheat flour) is an enriched grain. The wheat starch is a grain derivative and therefore does not count as a grain ingredient in CACFP. Therefore, this product meets the *Rule of Three* based on the two grain ingredients.



Question – If a corn chip’s ingredient list says: “whole corn, vegetable oil, salt, cheddar cheese, maltodextrin, wheat flour, Romano cheese, whey protein concentrate”, does it pass the *Rule of Three* and meet the whole grain-rich criteria?

Answer – This product is not creditable as a whole grain-rich product for CACFP using the Rule of Three, because although the first ingredient is a whole grain (whole corn), the next grain ingredient is unenriched wheat flour. However, this item is creditable as a grain that is not being served as a whole grain-rich item because the first grain is a whole grain.



Question – If a cheese pizza’s ingredient statement reads: “mozzarella cheese, parmesan cheese, white whole wheat flour, brown rice flour, enriched flour, non-fat milk, water, tomato paste, yeast”, does it pass the *Rule of Three* test and is it creditable in the CACFP?

Answer – This product meets the whole grain-rich criteria using the *Rule of Three* because the first and second grain ingredients are whole grains and the third grain ingredient is enriched. This cheese pizza crust passes the *Rule of Three* test and it meets the whole grain-rich criteria because whole grain is listed as the primary ingredient out of the first three grain ingredients listed.



Question – If an ingredient statement has a flour blend listed as “whole grains (bulgur wheat, wheat, rye, oats, barley, triticale, corn, millet)”, is the flour blend considered to be a whole grain using the *Rule of Three*? Is this considered one grain ingredient or 8 grain ingredients?

Answer – This flour blend is not considered to be whole grain-rich. If a flour blend includes any grains that are not whole grains, then the flour blend is not considered a whole grain. This flour blend should be treated as one ingredient when applying the *Rule of Three*.



Question – Where can a comprehensive list of grains be found that identifies what grains are whole grain, bran and germ, enriched grains, disregarded ingredients and non-creditable grains?

Answer – Policy Memo [CACFP 09-2018](#) contains a comprehensive list of grains classified by whole grain, bran and germ, enriched grains, disregarded ingredients and non-creditable grains.



Question – What ingredients can be disregarded (ignored) when using the *Rule of Three* to assess whether a product is whole grain-rich?

Answer – The following ingredients can be disregarded:

- Any ingredients that are less than 2 percent of a product weight (any ingredients listed on the ingredient list after the words “contains 2% or less”)
- Any grain derivatives which are generally presented in only small amounts, such as: wheat gluten, wheat starch, wheat dextrin, corn starch, corn dextrin, rice starch, tapioca starch, modified food starch.



Question – Do non-creditable ingredients that appear as a sub-listing of a secondary ingredients (such as a seasoning blend or thickening agent) need to be considered in the *Rule of Three*?

Answer – Non-creditable ingredients that appear as a sub-listing of a secondary ingredient (such as in a seasoning blend or a thickening agent) are typically negligible and are considered an insignificant amount.

For example, in the following ingredient list for a chili dish, the flour is sub-listed as part of the secondary ingredient, the seasoning: ground turkey, kidney beans, onions and spices (chili powder, cayenne pepper, oregano, paprika, garlic, onion, and flour). The flour is considered an insignificant amount.



Question – Is wheat protein isolate considered a grain ingredient when applying the *Rule of Three*?

Answer – Wheat protein isolate is an additive and NOT considered a grain when applying the *Rule of Three*?



Question – Do non-creditable grains that appear in the meat portion of a mixed product need to be considered when using the *Rule of Three*?

Answer – No. Non-creditable grains that appear in the meat portion of a mixed product are considered an insignificant amount and do not need to be considered in the *Rule of Three*.

For example, if the meat portion of a breaded beef patty (not the batter or the breading) is made with wheat flour, the amount of wheat flour in the beef patty is considered an insignificant amount.



Question – Do grain products have to be 100 percent whole grain to meet the whole grain-rich requirement?

Answer – No. Grain products do not need to be 100 percent whole grain to meet the whole grain-rich criteria. However, grain products that contain 100 percent whole grains do meet the whole grain-rich criteria. Whole grain-rich foods contain at least 50 percent whole grains and the remaining grains, if any, must be creditable (enriched grain, bran, and germ).



Question – Can a product labeled “whole grain” be used to meet the whole grain-rich requirement?

Answer – It depends, further investigation of the ingredient label would be needed to ensure that any grains in addition to the whole grains are enriched.



Question – Does “whole-grain” white bread meet the whole grain requirements?

Answer – It depends, further investigation of the ingredient label would be needed to ensure that the product contained at least 50% whole grains and the remaining grains, if any, must be enriched.



Question – Can centers and day care homes use the Whole Grain Stamps from the Whole Grain Council to determine if a grain product meets the whole grain-rich criteria?

Answer – No. While the Whole Grain Stamps provide useful information on the amount of whole grains a product contains, they are not sufficient documentation to determine if a food is whole grain-rich. This is because products that display a Whole Grain Stamp may also contain high amounts of non-creditable grains, such as non-enriched, refined flour. Centers and day care homes may instead use any of the six options outline by USDA to determine whether the product meets the whole grain-rich criteria.



Question – How do centers and day care homes know if a ready-to-eat breakfast cereal is “fortified”?

Answer – Cereal products that have been fortified are labeled as such and have an ingredient statement similar to the following (for EXAMPLE purposes only): “Ingredients: Whole wheat, sugar, oats, contains 2% or less of salt, baking soda, caramel color, annatto color, BHT for freshness. Vitamins and Minerals: Vitamin C (sodium ascorbate, ascorbic acid), niacinamide, vitamin B6 (pyridoxine hydrochloride), reduced iron, zinc oxide, folic acid, vitamin B2 (riboflavin), vitamin B1 (thiamin hydrochloride), vitamin A palmitate, vitamin D, vitamin B12.”



Question – What is the difference between breakfast cereal and ready-to-eat cereal?

Answer – Breakfast cereal is a broad term defined by the FDA as including ready-to-eat, instant, and regular hot cereals, such as oatmeal. Ready-to-eat cereals, or boxed cereals, are a type of breakfast cereal that can be eaten as sold and is typically fortified with vitamins and minerals. Some examples of ready-to-eat cereals are puffed rice cereal, whole grain o's, and granola. While a ready-to-eat cereal is always a breakfast cereal, a breakfast cereal is not always a ready-to-eat cereal.

FNS uses the terms “breakfast cereals” and “ready-to-eat cereals” in guidance because of their distinction. For example, only ready-to-eat cereals are allowed at snack under the infant meal pattern. All breakfast cereals, which include ready-to-eat cereals, must be made with enriched or whole grain meal or flour, or be fortified, and contain no more than 6 grams of sugar per dry ounce to be served in the CACFP.



Question – Is quinoa a creditable whole grain-rich grain in the CACFP?

Answer – Yes, quinoa is found in the food buying guide and is considered a whole grain-rich grain.



Question – If a grain product’s ingredient list includes “dough conditioner” is the product still creditable?

Answer – If the grain item contains a “dough conditioner” and the sub-listing of the “dough conditioner” includes a non-creditable grain in the ingredient statement, the item may still be creditable. For example, a loaf of bread may list a dough conditioner in the ingredient statement in the following manner: “dough conditioners (wheat flour, salt, soy oil, ascorbic acid).” Non-creditable grains, such as wheat flour, found in the dough conditioner sub-listing are considered insignificant. Therefore, in this example, if the primary grain ingredient is made from whole or enriched flour or bran or germ, the grain item is creditable.



Question – Are fully cooked grain products, such as pasta, whose ingredient list has water as the first ingredient and a whole grain as the second ingredient, considered whole grain-rich?

Answer – It depends. A fully cooked grain product with a whole grain as the second ingredient (after water) may or may not be whole grain-rich. The purchaser will need to evaluate the product using any of the six options for determining if the product meets whole grain-rich criteria. The purchaser can: 1) look for an FDA whole grain health claim, 2) check to see if the product is part of the WIC food package, 3) use the *Rule of Three* (which requires considering any additional ingredients), 4) look for an FDA whole wheat Standard of Identity (as for pasta), 5) request whole grain information from the manufacturer, or 6) consider if the product meets the NSLP whole grain-rich criteria.



Question – If a day care home prepares whole grain pancakes from scratch, do they have to have a recipe?

Answer – Yes. Similar to other foods made from scratch, centers and day care homes must have a standardized recipe in order to demonstrate that the pancakes meet the whole grain-rich criteria (if the pancakes are designated as the one whole grain-rich item of the day) or the enriched grain criteria. The standardized recipe is also necessary to show that the yield and serving sizes are adequate.



Question – If a standardized recipe for homemade bread calls for 2 cups whole wheat flour and 2 cups enriched flour, does the product meet the whole grain-rich requirement?

Answer – Yes, this recipe meets the whole grain-rich requirement, because it contains 50 percent whole grains and the remaining grains in the food are enriched.



Question – If an operator serves breakfast and lunch and the whole grain-rich grain is planned for lunch, but the operator is forced to close before serving lunch due to severe weather, will meals be disallowed?

Answer – No, if a center or day care home is unable to serve the meal with a whole grain-rich grain due to extenuating circumstances and the menu demonstrates that a whole grain-rich grain was planned for the missed meal(s), no meals will be disallowed on the basis that the whole grain-rich requirement was not met. Menus must show that at least one whole grain-rich grain is offered each day the center or home is operating.



Question – If a different group of children are at lunch than at breakfast, do both meals have to contain a whole grain-rich grain?

Answer – No, the whole grain-rich requirement applies to the center or day care home, not to each child or adult participant. If a center or day care home serves breakfast and lunch and two different groups of children or adults are at each meal, only one meal must contain a whole grain-rich food.

FNS strongly encourages centers and day care homes that have different groups of participants at each meal to vary the meal in which a whole grain-rich grain is served.



Question – If a center or day care home only serves one meal per day does the grain have to be whole grain-rich every day?

Answer – Yes. If a center or day care home only serves one meal per day (breakfast, lunch or supper), then the grain served at that meal must be whole grain-rich to meet the whole grain-rich requirement. When a meat/meat alternate is served in place of the grains component at breakfast (allowed a maximum of three times per week), and the center or day care home only serves that one meal per day, a whole grain-rich item does not need to be served.



Question – If a program only serves snacks, would all the grains served at snack have to be whole grain-rich?

Answer – Yes, if the snack includes a grain, such as crackers with apples, the grain must be whole grain-rich. However, programs that only serve snack, such as an At-Risk Afterschool snack, are not required to serve a grain at snack because it is not a required component at snack. A program may offer a reimbursable snack with a fruit and vegetable, milk and fruit, a meat alternate and vegetable, and so forth.



Question – If 3 components are served at snack, one of which is a grain, does the grain have to be whole grain-rich?

Answer – Only 2 components are required to be served at snack; therefore, if the sponsor were to identify the grain as an “extra” the grain would not be required to meet the whole grain-rich requirements as long as the two other items meet component requirements.



Question – Are there any criteria for identifying grain-based desserts?

Answer – In Exhibit A, foods are designated as grain-based desserts with a superscript 3 or 4. These foods cannot be part of a reimbursable meal in the CACFP. There is not a specific amount of sugar, fat, or any other nutrient that qualifies a grain as a dessert. The following items are designated as grain-based desserts: cookies, sweet pie crusts, doughnuts, cereal bars, breakfast bars, granola bars, sweet rolls, toaster pastries, cake, and brownies.

It is important to note that cookies do not have a standard of identity, so a food manufacturer may come up with fanciful names that could mislead the menu planner into serving a product that may not be allowed. When determining whether a food is a grain-based dessert, the menu planner should consider whether the food is commonly thought of as a dessert or treat.



Question – Is an animal cracker considered a grain-based dessert? Is an animal cookie considered a grain-based dessert?

Answer – If a product is labeled as a cookie, it automatically falls into the grain-based dessert category as the term “cookie” is denoted in Appendix A as a grain-based dessert. Animal crackers, according to exhibit A, are not considered a grain-based dessert and are a creditable grain.

As a best practice, centers and daycare homes should try and limit the amount of sweet crackers that are served as they are high in added sugars.



Question – Are breakfast bars, breakfast cookies, and soft oatmeal granola bars considered grain-based desserts?

Answer – If a product is labeled as a cereal bar, breakfast bar, breakfast cookie, or granola bar, they automatically fall into the grain-based dessert category as these terms are denoted in Appendix A as grain-based desserts.



Question – Are homemade granola bars or other homemade grain-based desserts allowed?

Answer – No, homemade and commercially prepared grain-based desserts cannot count towards the grain component in CACFP starting October 1, 2017. Granola bars are denoted with a superscript 4 in Exhibit A, so they qualify as a grain-based dessert. Based on stakeholder feedback, FNS decided using categories to define grain-based desserts was the best approach versus establishing nutrient standards or preparation requirements.



Question – If a center or day care home makes homemade granola, how can they determine if it meets the sugar limit for breakfast cereals?

Answer – When making homemade granola, a center or day care home must calculate the sugar content of the granola based on the recipe they use. The provider should keep the recipe on file to demonstrate the granola meets the breakfast cereal sugar limit if asked during a review.



Question – Are quick breads still allowed?

Answer – Yes, quick breads are breads that are leavened (risen) with ingredients like baking powder and baking soda, instead of yeast. Some examples of quick breads are banana bread, pumpkin bread, and zucchini bread. Quick breads are credited in the same group as muffins under Group D in Exhibit A and continue to be part of a reimbursable meal.



Question – Pancakes and waffles are not grain-based desserts according to Exhibit A. If syrup, honey, jam or another sweet topping is served with the pancakes or waffles, are they then considered grain-based desserts?

Answer – No, adding a sweet topping, such as syrup, to pancakes or waffles does not make them grain-based desserts and they can continue to be counted towards the grain component.



Question – Are filled bagel rolls considered a grain-based dessert?

Answer – A filled bagel roll would be considered a bagel and therefore would not be considered a grain-based dessert.



Question – Are scones and bread puddings considered a grain-based dessert?

Answer – Sweet scones, sweet bread puddings, and rice puddings are considered grain-based desserts and do not count towards the grain component. Savory scones, such as one made with cheese and herbs, credit like a biscuit and are not considered a grain-based dessert. Similarly, savory bread puddings, such as one made with spinach and mushrooms, are not considered grain-based desserts.



Question – Are breakfast rounds considered a grain-based dessert?

Answer – Yes, a breakfast round resembles a cookie; therefore, would be a grain-based dessert. Calling a product a different name does not exclude it from being a grain-based dessert.



Question – Are sweet breakfast biscuits, wafers, thins, and cookies considered a grain-based dessert?

Answer – Yes, these products resemble a cookie and are therefore considered grain-based desserts.



Question – Are sweet crackers, such as graham and animal crackers considered a grain-based dessert?

Answer – No, sweet crackers are excluded from being designated as a grain-based dessert in the CACFP. They are now designated with a superscript of 5 on the revised Exhibit A. Grain-based desserts are designated with a superscript of 3 or 4.



Question – Are crusts on savory pies, such as chicken pot pie, allowed?

Answer – Yes. Crusts on meat/meat alternate (savory) pies, such as a chicken pot pie, may credit towards the grain component if it contains at least $\frac{1}{4}$ serving grain per portion. For more information on how crusts on savory pies credit, please see the Food Buying Guide for Child Nutrition Programs available at <http://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs> and the web-based interactive Food Buying Guide at <https://foodbuyingguide.fns.usda.gov/>.



Question – Would a fruit pizza made with an oatmeal crust be considered a grain-based dessert? Can the fruit served on top of the fruit pizza count towards the fruit component?

Answer – Yes, the oatmeal cookie crust would be considered a grain-based dessert and cannot count towards the grain component. The fruit in the grain-based dessert can credit towards the fruit component as long as each serving contains at least $\frac{1}{8}$ cup fruit. The oatmeal cookie crust ingredients would not be considered an allowable cost of the food service account.



Question – Are handmade oatmeal balls considered a grain-based dessert?

Answer – Yes, oatmeal squares, bites or balls are considered a grain-based dessert as they resemble a cookie or granola bar.



Question – Are black bean brownies allowed at snack?

Answer – Brownies are considered grain-based desserts and cannot credit toward the grains component in any meal. In addition, the black beans in a brownie cannot count towards the meat/meat alternate or vegetable component. This is because they are not easily recognizable as a meat/meat alternate or vegetable and each portion is not likely to have a sufficient amount of meat/meat alternate or vegetable to contribute to the meat/meat alternate or vegetable component.



Question – How does a center or day care home determine if a breakfast cereal has no more than 6 grams of sugar per dry ounce (21.2 grams of sugar per 100 grams of dry cereal)?

Answer – There are several ways a center or day care home can determine if a breakfast cereal is within the sugar limit:

- First, centers and day care homes can use any State agency's Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) approved breakfast cereal list. Some stores also have labels on the shelves indicating which breakfast cereals are WIC-approved. All WIC-approved breakfast cereals contain no more than 6 grams of sugar per dry ounce.
- Second, FNS developed an easy-to-use chart to further help centers and day care homes identify breakfast cereals within the sugar limit. The chart is available on the second page of USDA's Team Nutrition training worksheet "Choose Breakfast Cereals That Are Low in Added Sugar" (<https://www.fns.usda.gov/tn/cacfp-meal-pattern-training-tools>).
- Lastly, centers and day care homes may do some math to determine the sugar content of a breakfast cereal. Using the Nutrition Facts label, the center or day care home may divide the amount of sugar per serving by the serving size in grams. If the amount of sugar per serving divided by the serving size in grams is 0.212 or less, then the cereal is within the sugar limit and may be creditable in CACFP. For example, Cereal A's Nutrition Facts Labels shows that the serving size is 55 grams and the amount of sugar per serving is 13 grams. Therefore, 13 grams (sugar) divided by 55 grams (serving size) equals 0.236. Cereal A exceeds the sugar limit because 0.236 is greater than 0.212.



Question – There are times when a breakfast cereal is within the sugar limit when using the chart in the “Choosing Breakfast Cereals That Are Lower in Added Sugars” worksheet but is not within the sugar limit when using the calculation in this memorandum. Which one is correct?

Answer – Both the chart and the calculation are valid ways of demonstrating a breakfast cereal meets the sugar limit. The discrepancy between the chart and calculation comes from rounding. To develop the chart, standard rules for rounding were used: round up to the next whole number if the number after the decimal point is 0.5 or greater, and round down if the number is less than 0.5.

FNS developed an alternate calculation that uses rounding and aligns with the chart that centers and day care homes may use:

- Step 1: Find the serving size in grams at the top of the Nutrition Facts label.
- Step 2: Multiply the serving size in grams by 0.212.
- Step 3: If the answer in step 2 ends in 0.5 or more, round the number up to the next whole number. If the answer in step 2 ends in 0.49 or less, round the number down to the next whole number.
- Step 4: Find the Sugars listed towards the middle of the Nutrition Facts label.
- Step 5: Compare the number from Step 4 with the number in Step 3. If the number from Step 4 is equal to, or less than, the number in Step 3, the cereal meets the sugar limit and may be creditable in the CACFP.



Question – Are recipes that include cereal that is compliant with the sugar limit considered to be grain-based desserts?

Answer – It depends. Recipes for items such as puppy chow, rice cereal treats and peanut butter cereal cookies would be considered grain-based desserts and would not be creditable in the CACFP. Recipes for items such as trail mix that includes compliant cereal, salty crackers and dried fruit would not be considered a grain-based dessert.



Question – Can a provider mix a high sugar cereal with a low sugar cereal to meet the sugar limit?

Answer – No. Generally, it is acceptable to mix creditable food items together to create another creditable food item, such as fruit and yogurt blended together to make a smoothie. However, providers may not mix a non-creditable food item with a creditable food item to make the new food item creditable. For example, a provider cannot mix a cereal with 8 grams of sugar per dry ounce with a cereal with 4 grams of sugar per dry ounce to create a cereal that has 6 grams of sugar per dry ounce (the sugar limit for breakfast cereals). Another example that is not allowed is mixing yogurts to create a yogurt that has no more than 23 grams of sugar per 6 ounces.



Question – Can sugar be added on top of oatmeal or another breakfast cereal that meets the sugar limit?

Answer – Breakfast cereals, as purchased, must contain no more than 6 grams of sugar per dry ounce. Similarly, if a center or day care home makes a breakfast cereal from scratch, such as granola, it must contain no more than 6 grams of sugar per dry ounce. Centers and day care homes may choose to add toppings to breakfast cereals to increase their appeal.



Question – May non-profit food service account funds be used to purchase grain-based desserts?

Answer – No, program funds may not be used to purchase non-creditable foods. The one exception to this policy is condiments, herbs and spices. While condiments, herbs and spices cannot credit towards the meal pattern requirements, condiments served with creditable foods and herbs/spices used to prepare and enhance the flavor of meals may be purchased with non-profit food service account funds.





Fruit and Vegetables

Question – How do raw leafy greens contribute to the vegetable component? Similarly, how does dried fruit contribute to the fruit component?

Answer – One cup of leafy greens (e.g., lettuce, raw spinach, etc.) counts as $\frac{1}{2}$ cup of vegetables and $\frac{1}{4}$ cup dried fruit counts as $\frac{1}{2}$ cup of fruit under the updated CACFP meal patterns, which went into effect on October 1, 2017. This is consistent with the National School Lunch and School Breakfast Programs.



Question – With separate vegetable and fruit components at lunch, supper, and snack in the updated CACFP meal patterns, how do food items that are mixtures of vegetables and fruit, such as a carrot-raisin salad, credit?

Answer – Food items that are mixtures of vegetables and fruits, such as a carrot-raisin salad, may credit towards both the vegetable component and the fruit component if they contain at least $\frac{1}{8}$ cup vegetable and $\frac{1}{8}$ cup fruit per serving that are easily identifiable. For example, a carrot-raisin salad served to 6 years olds that contains $\frac{1}{2}$ cup carrots and $\frac{1}{8}$ cup raisins (credits as $\frac{1}{4}$ cup fruit) meets the full vegetable component and the full fruit component.



Question – Can a vegetable be served in place of a fruit at meals?

Answer – Centers and day care homes may choose to serve two vegetables at lunch and supper, rather than a serving of vegetables and a serving of fruit. This means that the fruit component at lunch and supper may be substituted by an additional vegetable. The substituted vegetable must be at least the same serving size as the fruit component it replaced. When two vegetables are served at lunch or supper, they must be two different kinds of vegetables.

Vegetables and fruits are combined into one component at breakfast meals. Centers and daycare homes can continue to serve vegetables, fruits, or a combination of both at breakfast.



Question – If serving mixed peas and carrots and the quantities of the different vegetables are unknown can the vegetable mixture count as two vegetable servings?

Answer – No, if the quantities of the different vegetables are not known, such as frozen mixed carrots and peas, the vegetable mixture counts as one serving of vegetables and cannot count towards the fruit component. Another vegetable or fruit would need to be served to fulfil the fruit component. If the center or day care home mixed their own carrots and peas, for example, and served 6-year-old children $\frac{1}{2}$ cup carrots and $\frac{1}{4}$ cup peas mixed together. The peas replace the fruit component and meets the minimum serving size required for the fruit component for children 6-12 years old.



Question – Can snack chips/straws such as fruit, vegetable and potato chips/straws be credited towards the updated meal pattern requirements?

Answer – Snack chips/straws may not be credited as a fruit or vegetable. However, 100% dried fruits or vegetables are creditable. $\frac{1}{4}$ cup dried fruit or vegetable counts as $\frac{1}{2}$ cup of fruit or vegetable under the updated CACFP meal pattern requirements.

Snack chips and straws may not be credited towards the grain component unless obviously a grain such as quinoa sticks.



Question – May food ingredients that are unrecognizable contribute to the meal pattern requirements (for example, carrots pureed in a sauce for macaroni and cheese)?

Answer – Pureed/mashed vegetables or fruits may contribute to the CACFP meal pattern requirements as long as the dish also provides an adequate amount ($\frac{1}{8}$ cup) of recognizable, creditable fruits or vegetables per serving. Therefore, in the carrots and mac and cheese scenario, the pureed or mashed carrots can count towards the vegetable component if there is at least $\frac{1}{8}$ cup of another recognizable vegetable per serving.

Question – Are non-potato veggie tots creditable as a vegetable?

Answer – Yes, a non-potato veggie tot would contribute to the same food group as a potato tot, so can be served as a vegetable component. A CN label or Product Formulation Statement is needed for commercially prepared veggie tots to ensure the minimum vegetable serving size is offered. A standardized recipe would be needed for handmade veggie tots.



Question – If a center or provider serves a smoothie containing fruit and it contributes towards the fruit component of a meal or snack, does that count towards the juice limit?

Answer – Yes, pureed vegetables and fruits (fresh, frozen or canned) when served in a smoothie, credit as juice and, therefore, are subject to the limit on juice service. Fruit or vegetable juice may only be used to meet the vegetable or fruit requirement at one meal or snack per day.



Question – If an operator serves a morning snack to one group of children and an afternoon snack to a separate, different group of children, can juice be served at both of those snack services?

Answer – Program operators that offer half-day preschool where distinct and entirely different groups of children are enrolled for either a morning or afternoon session have a choice. Operators with half-day preschool may choose to handle the half-day sessions as two completely separate programs that are each subject to the all-day preschool meal patterns (e.g., juice is served once per day, at least one grain is whole grain-rich). In this scenario, juice may be served at a morning session meal and an afternoon session meal. Additionally, at least one of the grains must be whole grain-rich in the meals served during the morning session and the afternoon sessions.





CACFP in School Settings

Question – Are schools serving preschoolers now required to follow the updated preschool meal patterns?

Answer – Starting October 1, 2017, schools serving meals and snacks to preschoolers are required to follow the preschool meal pattern requirements; however, in recognizing the potential integrity issues and administrative challenges associated with serving two menus when preschoolers and K-5 students are in the same service area at the same time, schools may choose to follow the K-5 meal pattern when preschoolers and K-5 students are co-mingled at meal service.



Question – Schools that serve meals to preschoolers and K-5 students in the same service area at the time (co-mingled) may choose to follow the grade-appropriate meal patterns or the K-5 meal patterns for both grade groups. What is considered the “same service area”?

Answer – In general, “service area” refers to the place where students pick up or choose their meal items. In determining whether the service area qualifies as being the same for co-mingling purposes, schools should consider how difficult it would be to provide each age group the proper foods and portion sizes according to the grade-appropriate meal patterns. Factors such as being able to distinguish preschoolers from older children and switching out line items between groups should be taken into account. If a school determines that their service area cannot be adapted to appropriately serve different meal patterns to different age groups, the co-mingling flexibility may apply. Schools are encouraged to work with their State agency when determining if the co-mingling flexibility applies.



Question – Is the single-menu flexibility for co-mingled preschool meals limited to the transition period?

Answer – No. The flexibility to follow the grade-appropriate meal patterns for each grade group or the K-5 meal pattern when preschoolers and K-5 students are served meals in the same service area at the same time is not limited to the transition period (School Year 2017-2018).



Question – Are schools allowed to follow the K-5 meal pattern when preschoolers are not co-mingled with K-5 students?

Answer – When preschoolers are served meals in a different area or at a different time than K-5 students, schools must follow the preschool meal pattern. The option to serve the K-5 meal pattern to preschoolers is only allowed when preschoolers are co-mingled with K-5 students during meal service.



Question – If a school serves lunch and afterschool snack to preschoolers and the snack contains a grain, does the grain at snack have to be whole grain-rich?

Answer – If a school serves lunch and afterschool snack to preschoolers and the snack contains a grain, then either the grain at lunch or the grain at snack must be whole grain-rich. Under the updated preschool meal patterns, only one grain over the course of the day must be whole grain-rich.

Of course, schools are not required to serve a grain at afterschool snack. The school may offer a reimbursable snack with a fruit and vegetable, milk and fruit, a meat alternate and vegetable, and so forth. If the school chooses not to serve a grain item at afterschool snack for preschoolers, then the grain item at lunch must be whole grain-rich.



Question – If a school offers half-day preschool, can juice be served at morning and afternoon meals?

Answer – Schools that offer half-day preschool where distinct and entirely different groups of children are enrolled for either a morning or afternoon session have a choice. Schools with half-day preschool may choose to handle the half-day sessions as two completely separate programs that are each subject to the all-day preschool meal patterns (e.g., juice is served once per day, at least one grain is whole grain-rich). In this scenario, juice may be served at a morning session meal and an afternoon session meal. Additionally, at least one of the grains must be whole grain-rich in the meals served during the morning session and the afternoon sessions.



Question – If a school serves preschoolers lunch under the National School Lunch Program (NSLP) and a snack through the Child and Adult Care Food Program (CACFP), can the school serve juice at both lunch and snack?

Answer – Yes. While the intention of the requirement is to limit the service of juice to once per day, FNS understands that it would be logistically challenging to coordinate limiting juice service when a school operates both the School Meal Programs and the CACFP. Therefore, if a school serves preschool lunch (under NSLP) and a CACFP snack, both of those meals may contain juice.



Question – Does the flavored milk flexibility outlined in SP 32-2017 *School Meal Flexibilities for School Year 2017-2018* extend to the preschool meal patterns?

Answer – The flavored milk flexibility outlined in SP 32-2017 does not extend to the preschool meal pattern. Starting October 1, 2017, flavored milk cannot be part of a preschool reimbursable meal. Preschoolers must be served either unflavored low-fat (1 percent) or unflavored fat-free (skim) milk.

However, in situations where a school has preschoolers and older children being served in the same service area at the same time (co-mingled) and chooses to serve the K-5 meal pattern to both preschoolers and K-5 students, preschoolers may be served flavored milk as part of a reimbursable meal.

Question – If a 5-year-old student is in preschool, which meal patterns does the school follow for that student?

Answer – In situations when a 5-year-old is in a preschool, the school must follow the preschool meal pattern requirements. Similarly, if a 4-year-old is in kindergarten, the school must follow the K-5 meal pattern. While the age range for the preschool meal patterns is 1 through 4 years old and the age range for the K-5 meal pattern is 5 through 10 years old, schools must always follow the meal pattern that is appropriate for the grade of the student, and not the age.



Question – Do preschools have the option to use ounce equivalents for grains prior to October 1, 2019?

Answer – Yes. Schools may use ounce equivalents in the preschool meal patterns at any time. This is because an ounce equivalent is slightly heavier (16 grams of grain) than a “serving” (14.75 grams of grains). Therefore, the ounce equivalent meets the minimum quantity for the grains component.



Question – Do schools serving infants or preschoolers follow the water requirement for the School Meal Programs or for the CACFP?

Answer – Schools serving meals to infants and preschoolers must continue to follow the water requirements in the School Meal Programs as outlined in 7 CFR 210.10(a)(1)(i) and 220.8(a)(1).

For young infants, breastmilk and iron-fortified infant formula are the only beverages needed. When older infants start eating solid foods, the infant's health care provider may recommend introducing small amounts of water.



Question – Can reimbursable infant and preschool meals and snacks contain foods that are deep-fat fried on-site?

Answer – Under the updated infant and preschool meal patterns, foods that are deep-fat fried on-site cannot contribute towards a reimbursable meal. Schools serving meals to preschoolers may still purchase and serve foods that are pre-fried, flash-fried, or par-fried by the manufacturer, such as fried fish sticks or potato wedges. But those foods must be reheated using a method other than deep-fat frying.

Central, satellite kitchens are considered on-site. Therefore, meals served to preschoolers where the meal is prepared at a central, satellite kitchen cannot contain a deep-fat fried food and be claimed for reimbursement.

In contrast, because vended meals are pre-prepared, they are not considered to be prepared on-site. Therefore, schools serving meals to preschoolers may claim a vended meal that contains deep-fat fried foods as long as the deep-fat fried food was prepared by the vendor off-site.



Question – May schools that operate the CACFP and serve meals to children 5 years old and older choose to follow the NSLP and SBP meal pattern requirements?

Answer – Yes. Schools that serve meals to children 5 years old and older through the CACFP, may choose to follow the NSLP and SBP meal pattern requirements instead of the CACFP meal pattern requirements. For example, if a school operates the CACFP at-risk afterschool program, they may choose to follow the CACFP or the NSLP meal pattern requirements.



Question – Do preschools follow the School Meal Programs’ guidance (memorandum SP 59-2016) or the CACFP guidance (memorandum CACFP 14-2017) for accommodating students with disabilities?

Answer – All schools, no matter the grade or age of the students they are serving, must follow the guidance on accommodating students with disabilities as outlined in SP 59-2016, Modifications to Accommodate Disabilities in School Meal Programs. Program regulations require school food authorities to make food and beverage substitutions to meals to accommodate students with disabilities that restrict their diet. When accommodating disabilities, schools should focus on working collaboratively with parents or guardians to provide reasonable modifications to the meal or meal service to accommodate students with disabilities.



Question – Does a product exemption carry over to the CACFP for schools that have a whole grain-rich exemption approved through the National School Lunch/Breakfast Program for a particular product?

Answer – No, one whole grain-rich item must be offered per day as part of the CACFP when a grain is menued.



Question – How will the Administrative Review process work with the updated infant and preschool meal patterns?

Answer – School food authorities that provide meals to infants and preschoolers will continue to be monitored using the Administrative Review process. State agency staff must ensure schools operating the School Meal Programs offer and serve meals to students that meet the meal pattern requirements for the appropriate grade groups on all reimbursable meal service lines. Information will be added to the School Year 17-18 Administrative Review manual in the Section: Meal Pattern and Nutritional Quality, including applicable forms and tools for reviewers. The review process will be consistent with past years and the review of other grade groups. Starting October 1, 2017, when schools must comply with the updated infant and preschool meal patterns, State agencies will assess infant and preschool meals in accordance with the updated meal pattern for those grade groups. As a reminder, during the transition period, State agencies must provide technical assistance in lieu of fiscal action when they observe violations related to the updated meal pattern requirements.



Question – Can a school serve breakfast to Pre-K students under the School Breakfast Program and an AM snack via CACFP?

Answer – The district cannot claim meals/snacks under CACFP and NSLP for the same children over the same hours of the day.

As long as the child isn't being claimed for more than 2 meals and 1 snack or 2 snacks and 1 meal it would be allowable (At-Risk Afterschool Meals not considered).

Ex. A child eats breakfast at school at 7:45 am and this meal could be claimed under NSLP because the child is not “in the CACFP” until programming starts at 8:30 am. The AM snack could then be claimed under CACFP.



Question – Can a school serve lunch to Pre-K students under the National School Lunch Program and a PM snack via CACFP?

Answer – The district cannot claim meals/snacks under CACFP and NSLP for the same children over the same hours of the day.

As long as the child isn't being claimed for more than 2 meals and 1 snack or 2 snacks and 1 meal it would be allowable (At-Risk Afterschool Meals not considered).

Ex. A child eats lunch at school at 12:30 pm and this meal could be claimed under NSLP because the child is not “in the CACFP” until programming starts at 1:00 pm. The PM snack could then be claimed under CACFP.



Question – Does CACFP have a milk variety requirement such as in School Nutrition Program (SNP)?

Answer – CACFP does not have a milk variety requirement. Children that are 1 year old must receive unflavored whole milk. Children 2-5 years old must receive unflavored non-fat or low-fat milk.



Question – Do schools have to identify the reimbursable meal when serving Pre-K children as part of the School Nutrition Program (SNP)?

Answer – All SNP requirements remain. So yes, the reimbursable meal must still be identified. The only change is that the meal pattern components be served to meet the appropriate age group per the CACFP meal pattern requirements when serving Pre-K students.



Question – Are schools required to post an “And Justice for All Poster” in each classroom that meals are served?

Answer – There are not enough posters to post one in every classroom. Placing in a location that parents can see when they come into the building is sufficient.



Question – Are schools serving Pre-K meals through the School Nutrition Program (SNP) required to follow the food safety training requirements?

Answer – Schools would need to meet the food safety requirements of the SNP. Teachers who oversee the meal in a classroom would need to meet the part-time food safety training requirements for SNP.

Question – Which staff members need to complete annual training as required through the School Nutrition Program (SNP)?

Answer – The term “school nutrition program staff” refers to individuals without managerial responsibilities who are involved in the day-to-day operations of the school food service for a school participating in the NSLP or SBP. Program staff would generally include individuals such as cooks, cashiers, and others who are involved in the preparation and service of school meals; individuals that are involved in other program operations such as eligibility determinations, meal counting and claiming, etc.; and support staff that may have an impact on the safety of school meals. However, a person who provides support to, but is not specifically involved in, the operation of the school nutrition program, such as the cleaning custodian, is not required to meet the training standards (even if they are paid using nonprofit food service account funds). The program director or manager must examine the job duties of program staff to determine what job-specific training they need to perform their jobs effectively and in compliance with program regulations.



Question – Is a food safety (HACCP) plan required at all serving sites, including the Pre-K meals served in classrooms through the SNP?

Answer – The new CACFP Meal Pattern does not change or add HACCP requirements. HACCP requirements should already be in place for program foods. The school HACCP food safety program must include any facility in which food is stored, prepared or served for the purposes of any sponsored Food and Nutrition Service program. See below for SOP's that may be helpful in this situation:

- SOP 16 – Transporting Food to Remote Sites (Satellite Kitchens) covers transporting food to remote sites, such as a classroom.
- SOP 17 – Serving Food covers serving of foods.
- SOP 21 – Procedures for Pre-plated Meals Transported to Alternate Serving Locations Using Time As a Public Health Control covers procedures for pre-plated meals transported to a remote site (such as a classroom) using time as a public health control.
- SOP 22 – Preparation of Foods with Potential to Cause Allergic Reactions covers foods with the potential to cause allergic reactions.
- SOP 23 – Returned Food and Re-service of Food/ Share Tables discusses how to handles returned food and re-service of food.



Question – Do schools that serve Pre-K students in the classroom through the SNP need to put individual classrooms down as alternate sites within KN-CLAIM?

Answer – No. Putting a note in the comments is helpful but not required.



Question – Can children participating in the Special Milk Program (SMP) be served flavored milk?

Answer – If the Special Milk Program (SMP) is serving Pre-K children, then flavored milk could not be served to these children. If the SMP is serving school-age children, then flavored milk would be allowable for these children.





Monitoring

Question – If a day care home serves breakfast and snack, and a grain is served at both breakfast and snack, but neither of the grains are whole grain-rich, which meal is disallowed?

Answer – The snack would be disallowed. This is because the snack is the meal with the lowest reimbursement rate that contained a grain. Conversely, if a grain was not served at snack and the grain at breakfast is not whole grain-rich, then the breakfast meal would be disallowed. In that situation, the breakfast meal is the meal with the lowest reimbursement rate that contained a grain.

Please note, though, that FNS provided a transition period for the updated CACFP meal patterns for Fiscal Year 2018. During the transition period, if a State agency or sponsoring organization observes a meal pattern violation related to the updated requirements, such as not serving a whole grain-rich grain, they must provide technical assistance in lieu of fiscal action.

Question – If a center serves breakfast and lunch and the whole grain-rich grain is planned for lunch, but the center is forced to close before serving lunch due to severe weather, will meals be disallowed?

Answer – No. If a center or day care home is unable to serve the meal with a whole grain-rich grain due to extenuating circumstances, no meals will be disallowed on the basis that the whole grain-rich requirement was not met.



Other Questions?

Contact:

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