

# Howard's News From MDE

October 26, 2017



Unfortunately, I didn't get to stay at the SNAM conference for the entire time (home emergency), but I heard it was a great conference. Here is some of the latest info:

## Smarter Lunchrooms

FYI - Michigan food service professionals are highlighted in the October 2017 [Smarter Lunchroom Newsletter](#).

## Signage

See the attached document which will detail the how, what, where, and when of the required signage for School Nutrition Programs.

## Portion Control

Idaho has a great resource on portion control. Visit [Estimating Quantities from Self-Serve Bars](#).

## Farm to School Grants

The [USDA Farm to School Grant Request for Applications \(RFA\)](#) is live! Please spread the word far and wide that folks may now apply for the \$5 million available in grant program funds.

**What:** [USDA Farm to School Grants](#) of up to \$100,000 for planning, implementing, or training on farm to school programs.

**Who:** Schools, non-profit organizations, farmers, and other eligible groups may apply. Priority areas for this cycle are:

- Applications from school districts (i.e. the school district is the lead applicant): schools or school districts will receive at least 50 percent of the overall number of planning and implementation awards.
- Projects that reach more than one school.
- Projects that serve a high proportion of children (at least 40 percent or more) who are eligible for free or reduced price meals.

**Why:** The purpose of the [USDA Farm to School Grant Program](#) is to assist eligible entities in implementing farm to school programs that improve access to local foods in eligible schools.

**When:** Applications are due December 8, 2017.

Interested in applying? Check out USDA's [resources for applicants](#) and our [FAQs](#). Am I Eligible? Does this project fit? Other questions? Don't hesitate to contact me at [jenna.segal@fns.usda.gov](mailto:jenna.segal@fns.usda.gov). Visit the [USDA Farm to School Grant website](#) for the RFA, FAQs, and information on upcoming webinars.

## Medicaid Direct Certification

Medicaid Direct Cert - The September 22, 2017, Direct Certification report refresh included students directly certified for free meals by matching with Medicaid benefits (M). The October 6, 2017, Direct Certification report included the addition of students that were directly certified for reduced-price meals by Medicaid matching (R). The impact of this project was significant as 178,000 Michigan students are now eligible for free meals and 31,000 began

receiving reduced-price meals. There have been many phone calls and emails about the impact of the addition of Medicaid to Direct Certification on the Verification process. The email that was sent out with answers to these questions is attached. We appreciate your patience with the addition of Medicaid matching to direct certification. Medicaid is an important addition to the Direct Certification process adding another cohort of at-risk children receiving free, nutritious meals while in school. This increase in directly certified students could raise the individual student percentage rate for participation in the Community Eligibility Program which allows schools to feed all students for free. Most importantly, the MDE School Nutrition Programs along with the school districts in Michigan will be furthering the mission of ***Nourishing Michigan's Future***.

## Reminder to Access the Direct Certification Report

The Direct Certification Report is refreshed biweekly during the months of August, September, and October and then monthly thereafter. The most recent refresh of the Direct Certification Report Refresh was October 20, 2017. The next refresh will be December 4, 2017. This report is important because you will need to use the Direct Certification data for the School Food Authority Verification Collection Report that opens December 2017. The Michigan Department of Education School Nutrition Programs recommends you access the Direct Certification Report whenever it is refreshed. The dates of each report refresh are listed on the [Center for Education Performance and Information \(CEPI\) website](#) on the CEPI Master Calendar.

For questions about Direct Certification:

Lisa Taylor, Consultant, School Nutrition Programs, by email at [browntaylorl@michigan.gov](mailto:browntaylorl@michigan.gov) or by phone at 517-241-3885

Pam Baker, Consultant, School Nutrition Programs, by email at [BakerP8@michigan.gov](mailto:BakerP8@michigan.gov) or by phone at 517-241-2096.

## CACFP 01-2018 – Grain Requirements in the CACFP; Questions and Answers

This memo (attached) clarifies how to determine if a grain food item is creditable, how to determine whether it meets the whole grain criteria and provides updated guidance on how centers and family day care homes are to document compliance with the grain requirements. Also included is an updated "Exhibit A: Grain Requirements for Child Nutrition Programs" and updated questions and answers. This memo supersedes CACFP 02-2017, Grain requirements in the Child and Adult Care Food Program; Questions and Answers, October 24, 2016.

## CACFP 02-2018 – Feeding Infants and Meal Pattern Requirements in the CACFP; Questions and Answers

This memo (attached) provides updated guidance on feeding infants and the updated infant meal patterns. It provides clarification on infant menu record documentation requirements along with updated guidance on providing menu accommodations for participants with disabilities. The memo includes a Question and Answer section in the attachment. This memo supersedes *CACFP 06-2017: Feeding Infants and Meal Pattern Requirements in the Child and Adult Care Food Program; Questions and Answers*, January 17, 2017.

## School Program (SP) 01-2018 – Updated Infant and Preschool Meal Patterns in the National School Lunch Program and School Breakfast Program; Questions and Answers

This memo (attached) provides consolidated guidance from the final rule that apply to schools in one document for easy reference. Schools serving meals to infants and children ages one through age 4 years (preschoolers) must comply with the updated meal patterns as of October 1, 2017. While changes to the updated infants and preschool meal patterns made them more consistent to requirements for older grade groups (K through 12 grade), some requirements are different to reflect the younger age group and their unique nutritional needs. This memo provides guidance on infant meals; preschool fluid milk requirements, grain requirements (including whole grain-rich and sugar limits for cereal); vegetable and fruit requirements; yogurt sugar limits; and meal service options such as family style meals and offer vs. serve. This memo supersedes SP 35-2011, CACFP 23-2011, *Clarification on the Use of Offer vs. Serve and Family Style Meal Service*, May 17, 2011, as it applies to the School Meal Programs.

## Detroit Public Schools Community District Nutrition Director Position

Detroit Public Schools Community District (DPSCD) is hiring for a [Director of the Office of School Nutrition](#). The position opened October 17 and closes October 30, 2017.

The district is in a very exciting place, having a board-elected superintendent, Dr. Nikolai Vitti, born and raised in Detroit who has recently issued a charge to his cabinet for student health and school meals specifically to be a priority for schools under his leadership. In tandem with 83 school gardens run through the DPSCD Office of School Nutrition Farm and Garden program as well as a [FoodCorps](#) AmeriCorps service deployment - Detroit schools has the opportunity to take big strides for student health. With the right leader, DPSCD is ready to undergo transformational environment, attitude, and behavior changes for the health of students and adults across the community.

Stated in the job description:

The ideal candidate for this position must be innovative in their thinking and approach to design and recreate a breakfast and lunch program that meets the budgetary and National School Lunch Program requirements while appealing to children. We believe this leader will have an immediate impact on learning in the classroom and more importantly, help children develop a confidence in food and be more willing to try new foods, particularly as it relates to the 83 school gardens within the district.

Hope you found some useful information!

# Office of School Support Services

## School Nutrition Programs

The Monthly Training topic for October is Signage. We hope you find this information helpful.

### Signage

School Food Authorities (SFAs) operating the National School Lunch Program (NSLP) and/or School Breakfast Program (SBP) must follow meal pattern requirements for each age/grade group. SFAs must ensure that they are offering reimbursable meals at breakfast and lunch according to the federal regulations.

Per 7 CFR 210.10(a)(2), SFAs are required to identify at or near the beginning of the serving line the food or food components that make up a unit-priced reimbursable breakfast and lunch meal. Signage should inform the students what comprises a reimbursable meal. It should aim at reducing the unintended purchase of a la carte items and assist students in making healthy food choices.

### Signage requirements for SFAs

Signage must be present at every site and serving line that serves breakfast and lunch.

Signage must clearly inform the student what food or food components are to be selected for a reimbursable breakfast and lunch meal.

Signage must be posted at or near the beginning of the serving line.

Signage must be up-to-date and reflect the number of items, including multiple items, being offered on the menu by appropriate age/grade group.

Signage must be appropriate for the age/grade group being served and in an area they can easily see.

Signage must explain a ½ cup serving of fruit and/or vegetable must be taken, if the site is offer versus serve.

### Resources for Signage

[ID Reimbursable Meal – Ideas and Resources](http://www.k12.wa.us/ChildNutrition/Programs/NSLBP/pubdocs/IDReimbursableMeal-IdeasandResources.pdf)<sup>1</sup>

[ID Reimbursable Meal – Sign - List](http://www.k12.wa.us/ChildNutrition/Programs/NSLBP/NewMealPatterns.aspx)<sup>2</sup>

[ID Reimbursable Meal – Sign - Tray Image](http://www.k12.wa.us/ChildNutrition/Programs/NSLBP/pubdocs/IDReimbursableMeal-Sign-Image.pdf)<sup>3</sup>

### Monitoring

During an Administrative Review (AR), the following will be reviewed:

Is there signage clearly explaining what constitutes a reimbursable breakfast to students?

Is there signage clearly explaining what constitutes a reimbursable lunch to students?

Is water or any other beverage being promoted as an alternative selection to fluid milk throughout the food service area? Does the signage explaining what constitutes a reimbursable meal to students include the requirement to select at least ½ cup fruit or vegetable if implementing Offer versus Serve?

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<sup>1</sup> <http://www.k12.wa.us/ChildNutrition/Programs/NSLBP/pubdocs/IDReimbursableMeal-IdeasandResources.pdf>

<sup>2</sup> <http://www.k12.wa.us/ChildNutrition/Programs/NSLBP/NewMealPatterns.aspx>

<sup>3</sup> <http://www.k12.wa.us/ChildNutrition/Programs/NSLBP/pubdocs/IDReimbursableMeal-Sign-Image.pdf>



## Direct Certification and Verification Frequently Asked Questions

The October 6, 2017, Direct Certification Report will include Medicaid Reduced-Price eligibility. The indicator will be (R). The match date will be back dated to 9/19/2017 for all Medicaid Reduced-Price matches.

Q1. How will the Direct Certification Report refresh impact verification?

- Students that have approved applications and are now directly certified are no longer subject to verification. Their applications should be excluded from the sample pool and replaced with a new application.
- If the household has already been notified of verification, they should be informed of their new benefit and that they no longer need to submit documents for verification.
- The number of current school year applications may decrease, and the verification sample may be less. To determine the correct sample size, recount the total number of applications approved by October 1, 2017, and calculate the sample size using the correct sample method.

Q2. What if a student has an approved free application on file and shows up on the Direct Certification Report as Reduced-Price?

- Use the eligibility that will be of the greatest benefit to the student. For example, a household has already been approved for free meals by application. If a student in the household becomes eligible for reduced-price meals on the Direct Certification report, they would still receive free meals because it is the better benefit.

Q3. What if a student has an approved free application on file and shows up on the Direct Certification Report as Free?

- The student should be switched to free by Direct Certification instead of free by application on the benefits issuance list and the electronic system.
- This will provide more accurate Direct Certification numbers for the School Food Authority-Verification Report (SFA-VCR).



Food and  
Nutrition  
Service

Park Office  
Center

3101 Park  
Center Drive  
Alexandria  
VA 22302

DATE: October 19, 2017

MEMO CODE: CACFP 01-2018

SUBJECT: Grain Requirements in the Child and Adult Care Food Program;  
Questions and Answers

TO: Regional Directors  
Special Nutrition Programs  
All Regions

State Directors  
Child Nutrition Programs  
All States

This memorandum explains the grain requirements for the Child and Adult Care Food Program (CACFP). This revision clarifies how to determine if a grain product is creditable and if it meets the whole grain-rich criteria, and provides updated guidance on how to document compliance with the grain requirements. It also includes an updated “Exhibit A: Grain Requirements for Child Nutrition Programs” in Attachment 1 and updated Questions and Answers in Attachment 2. This memorandum supersedes CACFP 02-2017, *Grain Requirements in the Child and Adult Care Food Program; Questions and Answers*, October 14, 2016.

## Background

On April 25, 2016, USDA’s Food and Nutrition Service (FNS) published the final rule “Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010”. The final rule amended the CACFP regulations at 226.20 to update the meal pattern requirements. CACFP centers and day care homes had to start complying with the updated meal pattern requirements on October 1, 2017.

This memorandum explains the grain requirements established in the final rule, including information on whole grain-rich foods, grain-based desserts, and the breakfast cereal sugar limit. Although FNS’ goal is to streamline guidance and align Child Nutrition Programs to the extent possible, the agency recognizes that CACFP operates differently than the National School Lunch Program and National School Breakfast Program (School Meal Programs). Due to the distinguishing nature of the CACFP, and because the CACFP meal patterns were designed to be cost neutral, there are some instances when the guidance for the CACFP is different than the guidance for the School Meal Programs.

The final rule also requires that grains be credited using ounce equivalents (oz eq) instead of “servings,” as credited under the previous meal pattern requirements. This change is consistent with the Dietary Guidelines. In recognizing that this requires a significant

operational change for centers and day care homes, FNS is delaying the implementation of oz eq until October 1, 2019. FNS will issue additional guidance on oz eq in the future.

## **I. REQUIREMENTS**

As a reminder, it remains a requirement that all grain products served in the CACFP must be made with enriched or whole grain meal or flour (7 CFR 226.20(a)(4)(i), or bran or germ. Grain is a required component at breakfast, lunch and supper meals, and is optional at snack.

### **Enriched Grains**

Enriched grains are grains that have certain B vitamins and iron added back to them after processing. There are two simple ways to determine if a grain is enriched. The following checklist can be used to determine if a grain is enriched. The food must meet at least one of the following in order to be creditable:

1.  The food is labeled as enriched.
2.  An enriched grain is listed as the first ingredient on the food's ingredient list, or second after water. The label will usually say "enriched flour" or "enriched wheat flour," or there is a sub-listing of nutrients used to enrich the ingredient. For example, in this ingredient list, the yellow corn flour has a sub-list of nutrients used to enrich it: "whole wheat flour, yellow corn flour {folic acid, riboflavin, niacin, and thiamine}".

Breakfast cereals that are fortified are also creditable. Please see question number 2 under "III. BREAKFAST CEREALS" in the attached Questions and Answers for more information on how to identify fortified cereals.

### **Whole Grain-Rich**

Under the updated meal patterns, at least one serving of grains per day must be whole grain-rich (7 CFR 226.20(a)(4)(i)(A)). Foods that meet the whole grain-rich criteria are foods that contain 100 percent whole grains, or that contain at least 50 percent whole grains and the remaining grains in the food are enriched. This whole grain-rich requirement only applies to meals served to children and adults; it does not apply to infant meals.

There are four simple ways to determine if a grain product meets the whole grain-rich criteria. The following checklist can be used to decide if a grain is whole grain-rich. The food must meet at least one of the following:

1.  The food is labeled as "whole wheat".

Grain products that are specifically labeled as "whole wheat bread", "entire wheat bread", "whole wheat rolls", "entire wheat rolls", "whole wheat buns", and "entire wheat buns" are 100 percent whole wheat and meet the whole grain-rich criteria.

Please see Question 12 under “I. WHOLE GRAIN-RICH” in the attached Questions and Answers for more information.

2.  A whole grain is listed as the first ingredient on the food’s ingredient list (or second after water), and the next two grain ingredients are creditable (whole or enriched grains, bran, or germ). Please see the next section *Non-Creditable Grains* for more information about the *rule of three*.

Some examples of whole grain ingredients are whole wheat, brown rice or wild rice, oatmeal, bulgur, whole-grain corn, and quinoa.

3.  The product includes one of the following Food and Drug Administration approved whole-grain health claims on its packaging:

“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.”

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.

4.  Proper documentation (from a manufacturer or a standardized recipe) demonstrates that whole grains are the primary grain ingredient by weight.

When a whole grain is not listed as the first ingredient, the primary ingredient by weight may be whole grain if there are multiple whole-grain ingredients and the combined weight of those whole grains is more than the weight of the other ingredients. For example, bread may be made with three grain ingredients: enriched wheat flour (40 percent of grain weight), whole-wheat flour (30 percent of grain weight) and whole oats (30 percent of grain weight). The combined weight of the two whole-grain ingredients (whole wheat and whole oats at 60 percent) is greater than the enriched wheat flour (at 40 percent), even though the enriched wheat flour is listed first on the ingredient list. This bread could meet the whole grain-rich criteria with proper documentation from the manufacturer or a standardized recipe, for foods prepared by a CACFP center or day care home.

If the first ingredient (or second after water) on a grain food’s (e.g., breads and rolls) ingredient list or the grain portion of a mixed product’s (e.g., breaded chicken patties) ingredient list is not

whole grain or enriched, centers and day care homes must request proper documentation from a manufacturer demonstrating the primary grain ingredient by weight is whole grain to decide if the product meets the whole grain-rich criteria.

### *Non-Creditable Grains*

Whole grains, enriched grains, bran, and germ are creditable grains in the CACFP. Other grain ingredients are considered non-creditable. There may be times when non-creditable grains appear in the ingredient list of a food. Some examples of non-creditable grain ingredients include: bromated flour, durum flour, white flour, wheat starch, corn starch, modified food starch, and vegetable flours (e.g., potato and legume flours). Non-creditable grains in insignificant amounts are acceptable. To the extent possible, centers and day care homes should choose foods with an insignificant amount of non-creditable grains.

When identifying creditable grain products, centers and day care homes should use the *rule of three*: make sure the first grain ingredient (or second after water), is whole or enriched, and the next two grain ingredients (if any) are whole grains, enriched grains, bran, or germ. If the product has the statement “contains 2% or less,” any ingredients listed after that are considered insignificant. They do not need to be considered in the *rule of three*. For example, an ingredient list may state “contains less than 2% of wheat flour and corn starch.” In this example, the wheat flour and corn starch can be disregarded.

Grains and non-grains may be mixed together on an ingredient list. For example, a bread ingredient list may say: “water, whole wheat flour, yeast, sugar, enriched white flour, wheat gluten, brown rice flour, salt.” In this example, the first ingredient after water is a whole grain. The second grain ingredient is an enriched grain, and the third grain ingredient is a whole grain. This bread passes the *rule of three* test. It also meets the whole grain-rich criteria because the first ingredient after water is a whole grain. Centers and day care homes do not need to check any other grain ingredients further down on the ingredient list to verify if they are creditable. Also, there is no need to use the *rule of three* for ready-to-eat breakfast cereals that are fortified. If a ready-to-eat breakfast cereal has a whole grain as the first ingredient (or second after water), and it is fortified, it meets the whole grain-rich criteria. Please see questions 3, 4, 5, 6, and 7 under “I. WHOLE GRAIN-RICH” in the attached Questions and Answers for more information on the *rule of three*.

State agencies have the discretion to determine what documentation is acceptable to demonstrate that a grain contains an insignificant amount of non-creditable grains. FNS encourages State agencies to continue to use the methods they currently have in place to determine if grains are creditable.

### *Child Nutrition Labels*

Manufacturers may apply for a Child Nutrition (CN) Label for qualifying products to indicate the number of oz eq that meet the whole grain-rich criteria. The term “oz eq grains” on the CN Label indicates that the product meets the whole grain-rich criteria. While FNS is not implementing oz

eq in CACFP until October 1, 2019, grain products with a CN Label indicating the number of oz eq that meet the whole grain-rich criteria do contribute to the CACFP meal pattern requirements as declared on the CN Label. This is because an oz eq is slightly heavier (16 grams of grains) than a serving size for CACFP (14.75 grams of grains). Therefore, the oz eq meets the minimum quantity for the CACFP grain component. Please refer to the CN Labeling Program website for more information about qualifying products (e.g., entrée items with at least 0.50 oz eq of meat/meat alternate) at <https://www.fns.usda.gov/cnlabeling/child-nutrition-cn-labeling-program>.

### **Grain-Based Desserts**

The Dietary Guidelines recommend limiting consumption of added sugars and saturated fats as part of a healthy eating pattern. It identifies grain-based desserts as sources of added sugars and saturated fats. To better align the CACFP meal patterns with the Dietary Guidelines, grain-based desserts cannot count towards the grain requirement at any meal or snack (7 CFR 226.20(a)(4)(iii)). This will help reduce the amount of added sugars and saturated fats that children and adults consume.

FNS gathered extensive feedback from stakeholders on how to define grain-based desserts. FNS concluded that using categories to define grain-based desserts, instead of establishing nutrient standards, is the best approach for the CACFP. Therefore, grain-based desserts are those items that are denoted with a superscript 3 or 4 in Exhibit A (Attachment 1) of this memorandum.

The Exhibit A in the previous version of this memorandum (CACFP 02-2017) included sweet crackers (e.g., graham and animal crackers) as grain-based desserts. However, based on further stakeholder feedback, FNS decided some flexibility was needed and issued policy memorandum CACFP 16-2017, *Grain-Based Desserts in the Child and Adult Care Food Program* (<https://www.fns.usda.gov/cacfp/grain-based-desserts-child-and-adult-care-food-program>) to exclude sweet crackers from being designated as grain-based desserts. Under the revised Exhibit A, the following foods are considered grain-based desserts: cookies, sweet pie crusts, doughnuts, cereal bars, breakfast bars, granola bars, sweet rolls, toaster pastries, cake, and brownies. As a best practice, FNS encourages centers and day care homes to serve sweet crackers on a limited basis because of their higher added sugar content.

FNS recognizes that centers and day care homes may want to occasionally serve grain-based desserts, such as for celebrations or other special occasions. As a reminder, centers and day care homes continue to have the flexibility to serve grain-based desserts as an additional food item that does not contribute to the meal components required for reimbursement.

### **Breakfast Cereals**

Breakfast cereals served to infants, children, and adults must contain no more than 6 grams of sugar per dry ounce (21.2 grams of sugar per 100 grams of dry cereal) (7 CFR 226.20(a)(4)(ii)). Breakfast cereals include ready-to-eat cereals and instant and hot cereals. As a reminder, only iron-fortified infant cereals and ready-to-eat cereals are reimbursable in the infant meal pattern. All breakfast cereals are reimbursable for the child and adult meal patterns. Breakfast cereals

must meet the sugar limit and be whole grain-rich, enriched, or fortified to be creditable in the CACFP.

There are several ways for centers and day care homes to determine if a breakfast cereal is within the sugar limit. Centers and day care homes may use any one of the following methods to determine if a breakfast cereal meets the sugar limit:

1. Use any State agency's Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) approved breakfast cereal list. Similar to CACFP, all WIC-approved breakfast cereals must contain no more than 6 grams of sugar per dry ounce (21.2 grams of sugar per 100 grams).
2. Use 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>). The worksheet includes a chart with common breakfast cereal serving sizes and the maximum amount of sugar the breakfast cereal may contain per serving.
3. Use the Nutrition Facts label on the breakfast cereal packaging to calculate the sugar content per dry ounce.
  - First, find the serving size in grams at the top of the Label and the sugars listed towards the middle.
  - Next, divide the total sugars by the serving size in grams.
  - If the answer is equal to or less than 0.212, then the cereal is within the required sugar limit and may be creditable in CACFP.

Question 5 under "III. BREAKFAST CEREALS" in Attachment 2, provides an example of this calculation.

4. Use an FNS-provided alternate calculation that uses rounding and aligns with the Team Nutrition training worksheet noted above:
  - First, find the serving size in grams at the top of the Nutrition Facts label.
  - Multiply the serving size in grams by 0.212.
  - 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. For example, if the answer in step 2 is 4.24, it is rounded down to 4.
  - Next, find the Sugars listed towards the middle of the Nutrition Facts label.

- 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.

As long as a breakfast cereal meets the sugar limit using at least one of the methods described above, it is considered within the sugar limit.

## II. COMPLIANCE

As currently required, centers and day care homes must demonstrate they are serving meals that meet the meal pattern requirements, including the grain requirements outlined in this memorandum. State agencies have the authority to determine what constitutes acceptable record keeping documentation to demonstrate compliance. To the extent possible, State agencies should not impose additional paperwork requirements to demonstrate compliance with the updated grain requirements. Instead, State agencies should maintain current recordkeeping requirements or update existing forms to avoid any additional burden while still demonstrating compliance with the meal pattern requirements.

Demonstrating compliance with the whole grain-rich requirement can be accomplished in a number of ways. As an example, centers and day care homes can indicate on the menu which grain items are whole grain-rich. This could be as simple as writing “whole wheat” or “WW” in front of “bread” so that the menu item reads “whole wheat bread” or “WW bread”, writing “whole grain-rich” in front of a food item, such as “whole grain-rich English muffins”, or having a check box signifying the food is whole grain-rich. It is the State agency’s and sponsor’s responsibility, as applicable, to verify the grains served are creditable and the whole grain-rich items being served meet the whole grain-rich criteria presented in this memorandum when conducting on-site reviews. This may include reviewing the grain products’ labels and other product information.

FNS understands that implementation of the updated CACFP meal patterns is a significant change for some centers and day care homes. In recognition of that, FNS established a transition period for the updated CACFP meal patterns for Fiscal Year 2018 (October 1, 2017 through September 30, 2018). Please see CACFP 13-2017, *Transition Period for the Updated Child and Adult Care Food Program Meal Patterns and the Updated National School Lunch and School Breakfast Programs’ Infant and Preschool Meal Patterns* (<https://www.fns.usda.gov/transition-period-updated-cacfp-infant-preschool-meal-patterns>). During the transition period, if a State agency or sponsoring organization observes a meal pattern violation related to the updated meal patterns, such as not serving a whole grain-rich grain, they must provide technical assistance in lieu of fiscal action.

Regional Directors

State Directors

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State agencies are reminded to distribute this memorandum to Program operators. Program operators should direct any questions concerning this guidance to their State agency. State agencies with questions should contact the appropriate FNS Regional Office.

A handwritten signature in black ink, appearing to read "Angela Kline". The signature is written in a cursive, flowing style.

Angela Kline

Director

Policy and Program Development Division

Child Nutrition Programs

Attachments

**EXHIBIT A: GRAIN REQUIREMENTS FOR CHILD NUTRITION PROGRAMS<sup>1,2</sup>**

Color Key: Footnote 5 = Blue, Footnote 3 or 4 = Red

<b>Group A</b>	<b>Ounce Equivalent (Oz Eq) for Group A</b>	<b>Minimum Serving Size for Group A</b>
<ul style="list-style-type: none"> <li>• Bread type coating</li> <li>• Bread sticks (hard)</li> <li>• Chow Mein noodles</li> <li>• Savory Crackers (saltines and snack crackers)</li> <li>• Croutons</li> <li>• Pretzels (hard)</li> <li>• Stuffing (dry) Note: weights apply to bread in stuffing.</li> </ul>	1 oz eq = 22 gm or 0.8 oz 3/4 oz eq = 17 gm or 0.6 oz 1/2 oz eq = 11 gm or 0.4 oz 1/4 oz eq = 6 gm or 0.2 oz	1 serving = 20 gm or 0.7 oz 3/4 serving = 15 gm or 0.5 oz 1/2 serving = 10 gm or 0.4 oz 1/4 serving = 5 gm or 0.2 oz
<b>Group B</b>	<b>Oz Eq for Group B</b>	<b>Minimum Serving Size for Group B</b>
<ul style="list-style-type: none"> <li>• Bagels</li> <li>• Batter type coating</li> <li>• Biscuits</li> <li>• Breads - all (for example sliced, French, Italian)</li> <li>• Buns (hamburger and hot dog)</li> <li>• Sweet Crackers<sup>5</sup> (graham crackers - all shapes, animal crackers)</li> <li>• Egg roll skins</li> <li>• English muffins</li> <li>• Pita bread</li> <li>• Pizza crust</li> <li>• Pretzels (soft)</li> <li>• Rolls</li> <li>• Tortillas</li> <li>• Tortilla chips</li> <li>• Taco shells</li> </ul>	1 oz eq = 28 gm or 1.0 oz 3/4 oz eq = 21 gm or 0.75 oz 1/2 oz eq = 14 gm or 0.5 oz 1/4 oz eq = 7 gm or 0.25 oz	1 serving = 25 gm or 0.9 oz 3/4 serving = 19 gm or 0.7 oz 1/2 serving = 13 gm or 0.5 oz 1/4 serving = 6 gm or 0.2 oz

Attachment 1

<sup>1</sup> In NSLP and SBP (grades K-12), all grains served must meet whole grain-rich criteria. For information on flexibilities, please contact your State agency. For all other Child Nutrition Programs, grains are whole grain or enriched or made with enriched or whole-grain meal and/or flour, bran, and/or germ. Under CACFP child and adult meal patterns, and in NSLP/SBP preschool meals, at least one grain serving per day must meet whole grain-rich criteria.

<sup>2</sup> For NSLP and SBP (grades K-12), grain quantities are determined using ounce equivalents (oz eq). All other Child Nutrition Programs determine grain quantities using grains/bread servings. Beginning Oct. 1, 2019, grain quantities in CACFP and NSLP/SBP infant and preschool meals will be determined using oz eq. Some of the following grains may contain more sugar, salt, and/or fat than others. This should be a consideration when deciding how often to serve them.

<sup>5</sup> Allowed in NSLP (up to 2.0 oz eq grain-based dessert per week in grades K-12) as specified in §210.10. May count towards the grain component in SBP (grades K-12), CACFP, NSLP/SBP infant and preschool meals, and SFSP.

<b>Group C</b>	<b>Oz Eq for Group C</b>	<b>Minimum Serving Size for Group C</b>
<ul style="list-style-type: none"> <li>• Cookies<sup>3</sup> (plain - includes vanilla wafers)</li> <li>• Cornbread</li> <li>• Corn muffins</li> <li>• Croissants</li> <li>• Pancakes</li> <li>• Pie crust (dessert pies<sup>3</sup>, cobbler<sup>3</sup>, fruit turnovers<sup>4</sup>, and meat/meat alternate pies)</li> <li>• Waffles</li> </ul>	<p>1 oz eq = 34 gm or 1.2 oz            3/4 oz eq = 26 gm or 0.9 oz            1/2 oz eq = 17 gm or 0.6 oz            1/4 oz eq = 9 gm or 0.3 oz</p>	<p>1 serving = 31 gm or 1.1 oz            3/4 serving = 23 gm or 0.8 oz            1/2 serving = 16 gm or 0.6 oz            1/4 serving = 8 gm or 0.3 oz</p>
<b>Group D</b>	<b>Oz Eq for Group D</b>	<b>Minimum Serving Size for Group D</b>
<ul style="list-style-type: none"> <li>• Doughnuts<sup>4</sup> (cake and yeast raised, unfrosted)</li> <li>• Cereal bars, breakfast bars, granola bars<sup>4</sup> (plain)</li> <li>• Muffins (all, except corn)</li> <li>• Sweet roll<sup>4</sup> (unfrosted)</li> <li>• Toaster pastry<sup>4</sup> (unfrosted)</li> </ul>	<p>1 oz eq = 55 gm or 2.0 oz            3/4 oz eq = 42 gm or 1.5 oz            1/2 oz eq = 28 gm or 1.0 oz            1/4 oz eq = 14 gm or 0.5 oz</p>	<p>1 serving = 50 gm or 1.8 oz            3/4 serving = 38 gm or 1.3 oz            1/2 serving = 25 gm or 0.9 oz            1/4 serving = 13 gm or 0.5 oz</p>
<b>Group E</b>	<b>Oz Eq for Group E</b>	<b>Minimum Serving Size for Group E</b>

Attachment 1

<ul style="list-style-type: none"> <li>• Cereal bars, breakfast bars, granola bars<sup>4</sup> (with nuts, dried fruit, and/or chocolate pieces)</li> <li>• Cookies<sup>3</sup> (with nuts, raisins, chocolate pieces and/or fruit purees)</li> <li>• Doughnuts<sup>4</sup> (cake and yeast raised, frosted or glazed)</li> <li>• French toast</li> <li>• Sweet rolls<sup>4</sup> (frosted)</li> <li>• Toaster pastry<sup>4</sup> (frosted)</li> </ul>	1 oz eq = 69 gm or 2.4 oz 3/4 oz eq = 52 gm or 1.8 oz 1/2 oz eq = 35 gm or 1.2 oz 1/4 oz eq = 18 gm or 0.6 oz	1 serving = 63 gm or 2.2 oz 3/4 serving = 47 gm or 1.7 oz 1/2 serving = 31 gm or 1.1 oz 1/4 serving = 16 gm or 0.6 oz
<b>Group F</b>	<b>Oz Eq for Group F</b>	<b>Minimum Serving Size for Group F</b>
<ul style="list-style-type: none"> <li>• Cake<sup>3</sup> (plain, unfrosted)</li> <li>• Coffee cake<sup>4</sup></li> </ul>	1 oz eq = 82 gm or 2.9 oz 3/4 oz eq = 62 gm or 2.2 oz 1/2 oz eq = 41 gm or 1.5 oz 1/4 oz eq = 21 gm or 0.7 oz	1 serving = 75 gm or 2.7 oz 3/4 serving = 56 gm or 2 oz 1/2 serving = 38 gm or 1.3 oz 1/4 serving = 19 gm or 0.7 oz

<sup>3</sup> Allowed in NSLP (up to 2.0 oz eq grain-based dessert per week in grades K-12) as specified in §210.10 and at snack service in SFSP. Considered a grain-based dessert and cannot count towards the grain component in CACFP or NSLP/SBP infant and preschool meals beginning October 1, 2017, as specified in §§226.20(a)(4) and 210.10.

<sup>4</sup> Allowable in NSLP (up to 2.0 oz eq grain-based dessert per week for grades K-12) as specified in §210.10. May count towards the grain component in SBP (grades K-12) and at snack and breakfast meals in SFSP. Considered a grain-based dessert and cannot count towards the grain component in the CACFP and NSLP/SBP infant and preschool meals beginning October 1, 2017, as specified in §§226.20(a)(4) and 210.10.

<b>Group G</b>	<b>Oz Eq for Group G</b>	<b>Minimum Serving Size for Group G</b>
<ul style="list-style-type: none"> <li>• Brownies<sup>3</sup> (plain)</li> <li>• Cake<sup>3</sup> (all varieties, frosted)</li> </ul>	1 oz eq = 125 gm or 4.4 oz 3/4 oz eq = 94 gm or 3.3 oz 1/2 oz eq = 63 gm or 2.2 oz 1/4 oz eq = 32 gm or 1.1 oz	1 serving = 115 gm or 4 oz 3/4 serving = 86 gm or 3 oz 1/2 serving = 58 gm or 2 oz 1/4 serving = 29 gm or 1 oz
<b>Group H</b>	<b>Oz Eq for Group H</b>	<b>Minimum Serving Size for Group H</b>

Attachment 1

<ul style="list-style-type: none"> <li>• Cereal Grains (barley, quinoa, etc.)</li> <li>• Breakfast cereals (cooked)<sup>6,7</sup></li> <li>• Bulgur or cracked wheat</li> <li>• Macaroni (all shapes)</li> <li>• Noodles (all varieties)</li> <li>• Pasta (all shapes)</li> <li>• Ravioli (noodle only)</li> <li>• Rice</li> </ul>	<p>1 oz eq = 1/2 cup cooked or 1 ounce (28 gm) dry</p>	<p>1 serving = 1/2 cup cooked or 25 gm dry</p>
<p><b>Group I</b></p>	<p><b>Oz Eq for Group I</b></p>	<p><b>Minimum Serving Size for Group I</b></p>
<ul style="list-style-type: none"> <li>• Ready to eat breakfast cereal (cold, dry)<sup>6,7</sup></li> </ul>	<p>1 oz eq = 1 cup or 1 ounce for flakes and rounds          1 oz eq = 1.25 cups or 1 ounce for puffed cereal          1 oz eq = 1/4 cup or 1 ounce for granola</p>	<p>1 serving = 3/4 cup or 1 oz, whichever is less</p>

<sup>3</sup> Allowed in NSLP (up to 2.0 oz eq grain-based dessert per week in grades K-12) as specified in §210.10 and at snack service in SFSP. Considered a grain-based dessert and cannot count towards the grain component in CACFP or NSLP/SBP infant and preschool meals beginning October 1, 2017, as specified in §§226.20(a)(4) and 210.10.

<sup>6</sup> Refer to program regulations for the appropriate serving size for supplements served to children aged 1 through 5 in the NSLP; breakfast served in the SBP, and meals served to children ages 1 through 5 and adult participants in the CACFP. Breakfast cereals are traditionally served as a breakfast menu item but may be served in meals other than breakfast.

<sup>7</sup> In the NSLP and SBP, cereals must list a whole grain as the first ingredient and be fortified, or if the cereal is 100 percent whole grain, fortification is not required. For CACFP and SFSP, cereals must be whole-grain, enriched, or fortified; cereals served in CACFP and NSLP/SBP infant and preschool meals must contain no more than 6 grams of sugar per dry ounce.

## **QUESTIONS AND ANSWERS**

New or updated questions are preceded by three asterisks (\*\*\*)

Questions related to grains found in CACFP 08-2017, *Questions and Answers on the Updated Meal Pattern Requirements for the Child and Adult Care Food Program*

(<https://www.fns.usda.gov/cacfp/questions-and-answers-updated-meal-pattern-requirements-child-and-adult-care-food-program>) now appear here.

### **I. WHOLE GRAIN-RICH**

#### **1. \*\*\*How will centers and day care homes identify whole grain-rich foods?**

Centers and day care homes can identify whole grain-rich foods using one of several methods. First, if a food is labeled “whole wheat” then the product meets the whole grain-rich criteria. Second, if a whole grain is listed as the first ingredient (or second after water) on the product’s ingredient list and the next two grain ingredients are creditable (whole or enriched grain, bran, or germ), then the product meets the whole grain-rich criteria. Third, centers and day care homes can look for one of the following FDA approved whole-grain health claims on its packaging: “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.”

Additionally, a center or day care home can work with a manufacturer to get the proper documentation demonstrating that whole grains are the primary grain ingredient by weight. For foods prepared by a CACFP center or day care home, a standardized recipe can be used to determine that whole grains are the primary grain ingredient by weight, and the rest are creditable (enriched grain, bran, or germ).

In recognizing that whole grain-rich products are not always easy to identify, FNS is developing training worksheets in English and Spanish to help CACFP centers and day care homes identify whole grain-rich foods. Additionally, USDA’s Team Nutrition developed the *Nutrition and Wellness Tips for Young Children: Provider Handbook for the Child and Adult Care Food Program* that includes tips on how to include more 100 percent whole-grain foods on menus ([http://www.fns.usda.gov/sites/default/files/whole\\_grains.pdf](http://www.fns.usda.gov/sites/default/files/whole_grains.pdf)).

#### **2. \*\*\*Are bran and germ creditable grains in the CACFP?**

Yes. Bran and germ are credited the same as enriched or whole-grain meal or flour in the CACFP.

#### **3. \*\*\*Why did FNS develop the *rule of three*?**

FNS developed the *rule of three* to simplify the process of identifying creditable grains

for CACFP center and day care home operators in recognition that the CACFP operates differently than the School Meal Programs and because the CACFP meal patterns were designed to be cost neutral. FNS understands that reading ingredient lists for grain foods and products can be difficult. It is challenging to determine the predominant weight of a grain product and how much non-creditable grains are in the product by only looking at the ingredient list. FNS encourages centers and day care homes to use their discretion when using the *rule of three* and consider the nutritional value of the entire product before serving it. If a grain product passes the *rule of three* test, centers and day care homes may want to also consider the amount of added sugars, saturated fats, and sodium in the product to ensure it contributes to a healthy eating pattern and the wellness of CACFP participants.

4. **\*\*\*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?**

No. The third grain ingredient is wheat starch; wheat starch is not a creditable grain. The *rule of three* requires the first three grain ingredients be creditable. Creditable grains are whole or enriched grains, bran, or germ. Wheat starch is not a whole grain or an enriched grain.

5. **\*\*\*If a loaf of bread’s ingredient statement reads: “enriched flour, water, honey, whole wheat flour, wheat gluten, yeast, sugar, whole grain corn, salt”, does it pass the *rule of three* test and is it creditable in the CACFP?**

Yes. The loaf of bread passes the *rule of three* test and is creditable in the CACFP as an enriched grain. The first three ingredients are creditable: the first ingredient is an enriched flour (an enriched grain), the second grain ingredient is whole wheat flour (a whole grain), and the third grain ingredient is whole grain corn (a whole grain). The loaf of bread does not meet the whole grain-rich criteria because the first ingredient (or second after water), is not a whole grain.

6. **\*\*\*How does the *rule of three* apply to mixed dishes?**

The *rule of three* may also be used for the grain portion of mixed dishes, such as pizza crusts and tortillas for burritos. If the first grain ingredient is whole grain and the next two grain ingredients (if any) are whole grain or enriched, then the product meets the whole grain-rich criteria. For example, a cheese pizza’s ingredient list may say: “mozzarella cheese, parmesan cheese, white whole wheat flour, brown rice flour, enriched flour, non-fat milk, water, tomato paste, yeast.” In this example, the first and second grain ingredients are whole grains. 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.

7. **Do non-creditable grains that appear in the meat portion of a mixed product need to be considered when using the *rule of three*?**

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. Additionally, 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.

**8. \*\*\* Are the FDA whole grain health claims sufficient documentation to demonstrate that a food is whole grain-rich?**

Yes. The FDA whole grain health claims outlined on page 3 of this memorandum demonstrates that the primary grain ingredient is whole grain. Therefore, they are considered sufficient documentation to demonstrate a grain meets the whole grain-rich criteria in the CACFP. As a best practice, if there are any remaining grains, (i.e., the food is not 100 percent whole grain), centers and day care homes should review the ingredient list to ensure the next two grain ingredients are whole or enriched grains, bran or germ (the *rule of three*).

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.

**9. \*\*\*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?**

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. Products that display a Whole Grain Stamp may also contain high amounts of non-creditable grains, such as non-enriched refined flour. Therefore, the Whole Grain Stamps from the Whole Grain Council alone are not sufficient documentation to demonstrate a product is whole grain-rich. Centers and day care homes must still review the ingredient list to determine that whole grains are the primary grain ingredient and there are insignificant amounts of non-creditable grains. The *rule of three* is an easy way to accomplish this.

**10. \*\*\*Do grain products have to be 100 percent whole grain to meet the whole grain-rich requirement?**

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). To assist centers and day care homes in implementation, FNS established the *rule of three*. Please see page 4 of the body of this memorandum for detailed information about the *rule of three*.

For child and adult meals and snacks, centers and day care homes must serve at least one whole grain-rich food per day. Requiring that at least one grain served per day be whole grain-rich, instead of 100 percent whole grain, gives centers and day care homes flexibility in choosing what grains they serve while still offering the nutritional benefits of whole grains. This flexibility will make it easier for centers and day care homes to find grain products that meet the updated meal pattern requirements.

**11. \*\*\*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?**

Yes. A grain product is considered whole grain-rich if water is listed as the first ingredient and a whole grain is listed as the second ingredient on the ingredient list and the next two grain ingredients (if any) are whole or enriched grain, bran or germ.

**12. \*\*\*Can wheat bread, rolls, and buns labeled as “100% whole wheat” be used to meet the whole grain-rich requirement?**

Yes. Grain products that are specifically labeled as “whole wheat bread”, “entire wheat bread”, “whole wheat rolls”, “entire wheat rolls”, “whole wheat buns”, and “entire wheat buns” are 100 percent whole wheat and are easily identifiable as meeting the whole grain-rich criteria. These products generally will not have any refined grains listed in the ingredient statement. If they do, it is considered to be an insignificant amount. Please note that foods with the label “whole grain”, “made with whole grains”, “made with whole wheat”, or “contains whole grains” do not necessarily meet the whole grain-rich criteria.

**13. In a recipe for bread, would ingredients listed as 2 cups of whole-wheat flour and 2 cups of enriched, white flour meet the whole grain-rich requirement?**

Yes. A food that contains 2 cups of whole-wheat flour and 2 cups of enriched, white flour would meet the whole grain-rich requirement. This is because it contains 50 percent whole grains and the remaining grains in the food are enriched.

**14. \*\*\*If a day care home prepares whole grain pancakes from scratch, do they have to have a recipe?**

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.

**15. Do centers and day care homes have the discretion to choose which meals will include a whole grain-rich grain?**

Yes. Centers and day care homes may choose to serve a whole grain-rich item at any meal or snack as long as one grain per day over the course of all the meals and snacks served that day is whole grain-rich. For example, a center may serve a whole grain-rich cereal at breakfast one day and a whole grain-rich pasta at lunch the next day. This will help expose participants to a variety of whole grains and the wide range of vitamins and minerals whole grains provide.

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

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 (such as one group of children at breakfast and a second group at lunch) to vary the meal in which a whole grain-rich item is served. For example, whole grain-rich toast could be served at breakfast on Monday and brown rice could be served at lunch on Tuesday. This will help ensure that all participants are served a variety of whole grains and benefit from the important nutrients they provide.

**15. If a center or day care home only serves one meal per day, does the grain have to be whole grain-rich every day?**

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.

Centers or day care homes that only serve a snack, such as an at-risk afterschool program, are not required to serve a grain at snack because it is not a required component at snack. However, in that situation, if a grain is served, it must be whole grain-rich.

**16. If an at-risk afterschool center only serves supper and chooses to use offer versus serve (OVS), do all of the grains offered have to be whole grain-rich?**

Yes. 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.

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

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 program, 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. Conversely, if a center or day care home only serves one meal (breakfast, lunch or supper) per day then the grain served at that meal must be whole grain-rich.

**II. GRAIN-BASED DESSERTS**

**1. Why are grain-based desserts no longer allowed to contribute to the grain component of a meal?**

The Dietary Guidelines for Americans (Dietary Guidelines) identify grain-based desserts as sources of added sugars and saturated fats. It recommends Americans reduce their consumption of added sugars and saturated fats. The Richard B. Russell National School Lunch Act requires the CACFP meal patterns to be consistent with the Dietary Guidelines. Therefore, in order to be more consistent with the Dietary Guidelines, grain-based desserts cannot count towards the grain components in CACFP under the updated meal pattern requirements. This will help reduce the amount of added sugars and saturated fats that children and adults consume.

**2. \*\*\*Are there any criteria for identifying grain-based desserts?**

In Exhibit A of this memorandum, 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. Establishing nutrient standards would increase complexity and burden on centers and day care homes because it would require evaluation of each grain item served against these nutrient standards. 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. Menu planners should also be aware that even if a product is not labeled as a traditional dessert item, it may contain higher levels of added sugars or saturated fats. Menu planners should use their discretion when serving these foods.

**3. \*\*\*Are homemade granola bars or other homemade grain-based desserts allowed?**

No. Homemade and commercially prepared grain-based desserts cannot count towards the grain component in CACFP starting October 1, 2017. Based on stakeholder feedback, FNS decided using categories to define grain-based desserts was the best approach versus establishing nutrient standards or preparation requirements.

**4. Are quick breads, such as banana bread and zucchini bread, still allowed?**

Yes. Quick breads are credited in the same group as muffins under Group D in Exhibit A (Attachment A), and both may continue to be part of a reimbursable meal.

**5. Are scones and grain puddings considered grain-based desserts?**

Sweet scones, sweet bread puddings, and rice puddings are considered grain-based desserts and cannot count towards the grain component. Savory scones, such as one made with cheese and herbs, credit like a biscuit and are not considered grain-based desserts. However, sweet scones, such as those made with fruit and icing, credit like a cookie and are considered grain-based desserts.

Bread puddings can also be savory or sweet. Sweet bread puddings, such as one made with chocolate chips, is considered a grain-based dessert. However, savory bread puddings, such as one made with spinach and mushrooms, are not considered grain-based desserts.

Menu planners should consider the common perception of the food item and whether it is thought of as a dessert when deciding to serve it. Using this approach is particularly important when a food item is not labeled as a dessert. If a menu planner is unsure of whether a food item is considered a grain-based dessert, he or she should work with his or her sponsor or State agency, as appropriate, to make the decision.

**6. Are black bean brownies allowed at snack?**

Brownies are considered grain-based desserts and cannot credit towards the grains component in any meal. In addition, the black beans in a brownie cannot count towards the meat/meat alternate component. This is because they are not easily recognizable as a meat/meat alternate and each portion is not likely to have a sufficient amount of meat/meat alternate (¼ ounce equivalency) to contribute to the meat/meat alternate component.

**7. \*\*\*Are crusts on savory pies, such as chicken pot pie, allowed?**

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 ¼ 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/>.

**8. Can centers and day care homes serve cake or another grain-based dessert for special celebrations, such as a birthday?**

Centers and day care homes may choose to serve grain-based desserts, such as cakes or cookies, during celebrations or other special occasions as an additional food item that is not reimbursable. FNS recognizes that there may be times when a center or day care home would like to serve foods or beverages that are not reimbursable. FNS encourages centers and day care homes to use their discretion when serving non-reimbursable foods and beverages, which may be higher in added sugar, saturated fats, and sodium, to ensure children and adult participants' nutritional needs are met.

**9. If a center or day care home chooses to serve a grain-based dessert with fruit, can the fruit count towards the fruit requirement?**

Yes. The fruit in the grain-based dessert can credit towards the fruit component. The grains portion of a grain-based dessert with fruit, such as pies, cobblers, or crisps, cannot count towards the grain component. Centers and day care homes should serve sweetened fruit in moderation to help reduce children and adults' consumption of added sugars and help children develop a taste preference for unsweetened fruit.

**10. May non-profit food service account funds be used to purchase grain-based desserts?**

No. CACFP centers or day care homes may not use Program funds to purchase non-creditable foods. Grain-based desserts are not creditable in the CACFP under the updated meal pattern requirements. 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 and spices used to prepare and enhance the flavor of meals may be purchased with non-profit food service account funds.

**11. 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?**

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. However, FNS strongly encourages centers and day care homes to explore healthier alternatives for toppings, such as fruit or yogurt. Minimizing sweet toppings will help reduce children's and adults' consumption of added sugars. When sugars are added to foods and beverages to sweeten them, they add calories without contributing essential

nutrients.

### **III. BREAKFAST CEREALS**

#### **1. What is the difference between breakfast cereal and ready-to-eat cereal?**

Breakfast cereal is a broad term defined by the Food and Drug Administration as including ready-to-eat, instant, and regular hot cereals, such as oatmeal (21 CFR 170.3(n)(4)). 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, 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 this distinction. For example, only ready-to-eat cereals are allowed at snack under the infant meal pattern, but all breakfast cereals served in the CACFP must be whole grain-rich, enriched, or fortified and contain no more than 6 grams of sugar per dry ounce.

#### **2. \*\*\*How do centers and day care homes know if a ready-to-eat breakfast cereal is "fortified"?**

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."

#### **3. Can a provider mix a high sugar cereal with a low sugar cereal to meet the sugar limit?**

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.

Logistically, it would be challenging for monitors to determine that the mixed cereal or yogurt meets its respective sugar limit during a review. Additionally, it would be difficult for providers to calculate the sugar content of mixed cereals and yogurt.

**4. \*\*\*Can sugar be added on top of oatmeal or another breakfast cereal that meets the sugar limit?**

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. FNS strongly encourages centers and day care homes to offer healthy toppings for breakfast cereals, such as fruit instead of brown sugar. Minimizing sweet toppings will help reduce children's and adults' consumption of added sugars. When sugars are added to foods and beverages to sweeten them, they add calories without contributing essential nutrients.

**5. \*\*\*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)?**

As a reminder breakfast cereals must meet the sugar limit and be whole grain-rich, enriched, or fortified to be creditable in CACFP. 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 (21.2 grams of sugar per 100 grams of dry cereal).

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 (listed towards the middle) by the serving size in grams (listed at the top). 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.

**6. \*\*\*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?**

Both the chart and the calculation are valid ways of demonstrating a breakfast cereal meets the sugar limit (no more than 6 grams of sugar per dry ounce, or 21.2 grams of sugar per 100 grams of dry cereal).

The discrepancy between the chart and calculation comes from rounding. To develop the chart, FNS used the standard rules for rounding: 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. This results in some breakfast cereals meeting the sugar limit when using the chart, but not the calculation. The Food and Drug Administration uses the same rounding rules for the Nutrition Facts label

(<https://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm064932.htm>). Therefore, some leniency is necessary.

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

- First, find the serving size in grams at the top of the Nutrition Facts label.
- Multiply the serving size in grams by 0.212.
- 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. For example, if the answer in step 2 is 4.24, it is rounded down to 4.
- Next, find the Sugars listed towards the middle of the Nutrition Facts label.
- 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.

A breakfast cereal that falls within the sugar limit using the chart or either of the calculations may be creditable. As a reminder, breakfast cereals must meet the sugar limit and be whole grain-rich, enriched, or fortified to be creditable in the CACFP.

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

When making homemade granola, centers and day care homes must calculate the sugar content of the granola based on the recipe they use. The provider should keep the standardized recipe on file to demonstrate the granola meets the breakfast cereal sugar limit if asked during a review.

#### **IV. COMPLIANCE**

**1. \*\*\*When submitting menus for review, do centers and day care homes need to document which grains are whole grain-rich?**

It is at the State agency's discretion to determine what is acceptable documentation to demonstrate compliance with the whole grain-rich requirement. Identifying which grains are whole grain-rich on the menus is a good best practice and is strongly recommended by FNS.

Identifying whole grain-rich foods on a menu may be done by using terms or abbreviations such as "whole grain-rich", "WGR", "whole wheat", or simply listing a whole grain. For example, a menu may say: "peanut butter and jelly sandwich on whole grain-rich bread", "whole wheat pasta and chicken", or "brown rice and vegetables". Another option could be to use a check box to identify which grain is whole grain-rich on the menu. Common and usual names for whole grains that are helpful to know and can be used to identify whole grain-rich foods on menus are:

- The word "whole" listed before a grain, such as "whole wheat" or "whole corn";
- The words "berries" and "groats" are used to designate a whole grain, such as "wheat berries" or "oat groats";
- Rolled oats and oatmeal (including old fashioned, steel cut, quick cooking, and instant oatmeal); and
- Other whole-grain foods that do not use the word "whole" in their description, such as brown rice, brown rice flour, wild rice, quinoa, millet, triticale, teff, amaranth, buckwheat, and sorghum.

When conducting on-site reviews, it is the State agency's or sponsor's responsibility, as applicable, to verify the grains served are creditable, including the whole grain-rich items served meet the whole grain-rich criteria presented in this memorandum

**2. \*\*\*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?**

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 (October 1, 2017 through September 30, 2018). Please see CACFP 13-2017, *Transition Period for the Updated Child and Adult Care Food Program Meal Patterns and the Updated National School Lunch and School Breakfast Programs' Infant and Preschool Meal Patterns*

(<https://www.fns.usda.gov/transition-period-updated-cacfp-infant-preschool-meal-patterns>). 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.

3. **\*\*\*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?**

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.

4. **\*\*\* When reviewing food labels to determine if a grain is creditable, how much non-creditable grain is acceptable?**

Centers and day care homes should purchase and serve grains with an insignificant amount of non-creditable grains. Centers and day care homes can be confident that a food contains an insignificant amount of non-creditable grains when they are listed after a “contains 2% or less” statement on the ingredient list. For example, an ingredient list may state “contains less than 2% of wheat flour and corn starch”.

To determine if a grain is creditable, centers and day care homes should use the *rule of three* described on page 4 of the body of this memorandum. State agencies have the discretion to determine what is acceptable documentation to demonstrate that a grain contains an insignificant amount of non-creditable grains. FNS encourages State agencies to continue to use the methods they currently have in place to determine if grains are creditable.

5. **\*\*\*If a grain says “dough conditioner” in the ingredient list, is the grain still creditable?**

Yes. 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 found in the dough conditioner sub-listing are considered insignificant; therefore the grain item is creditable.



Food and  
Nutrition  
Service

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DATE: October 19, 2017

MEMO CODE: CACFP 02-2018

SUBJECT: Feeding Infants and Meal Pattern Requirements in the Child and Adult Care Food Program; Questions and Answers

TO: Regional Directors  
Special Nutrition Programs  
All Regions

State Directors  
Child Nutrition Programs  
All States

The purpose of this memorandum is to provide guidance on feeding infants and the infant meal pattern requirements in the Child and Adult Care Food Program (CACFP). It also includes Questions and Answers in the Attachment. This revision clarifies meal documentation requirements related to the infant meal pattern, as described in CACFP 17-2017: *Documenting Meals in the Child and Adult Care Food Program* (<https://www.fns.usda.gov/cacfp/documenting-meals-child-and-adult-care-food-program>). In addition, it incorporates updated guidance on providing meal accommodations for participants with disabilities as described in CACFP 14-2017, SFSP 10-2017 *Modifications to Accommodate Disabilities in the Child and Adult Care Food Program and Summer Food Service Program* (<https://www.fns.usda.gov/modifications-accommodate-disabilities-cacfp-and-sfsp>). This memorandum supersedes CACFP 06-2017: *Feeding Infants and Meal Pattern Requirements in the Child and Adult Care Food Program; Questions and Answers*, January 17, 2017.

## Background

On April 25, 2016, USDA's Food and Nutrition Service (FNS) published the final rule "Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010." This final rule amended CACFP regulations at 7 CFR 226.20 to update the meal pattern requirements. CACFP centers and day care homes had to start complying with the updated meal pattern requirements on October 1, 2017.

When developing the updated infant meal patterns, FNS relied on recommendations from the American Academy of Pediatrics (AAP), the leading authority for children's developmental and nutritional needs from birth through 23 months, because the Dietary Guidelines do not currently provide recommendations for children under two years old. This memorandum outlines infant feeding requirements in the CACFP and explains the updated infant meal pattern requirements established in the final rule, including when solid foods must be served.

## I. OFFERING INFANT MEALS

Infants enrolled for care at a participating CACFP center or day care home must be offered a meal that complies with the CACFP infant meal pattern requirements (7 CFR 226.20(b)). CACFP regulations define an enrolled child as “a child whose parent or guardian has submitted to an institution a signed document which indicated that the child is enrolled in child care” (7 CFR 226.2). A center or day care home may not avoid this obligation by stating that the infant is not “enrolled” in the CACFP, or by citing logistical or cost barriers to offering infant meals. Decisions on offering Program meals must be based on whether the infant is enrolled for care in a participating CACFP center or day care home, not if the infant is enrolled in the CACFP.

Infants do not eat on a strict meal schedule. Instead, infants must be fed during a span of time that is consistent with the infant’s eating habits. Infant meals must not be disallowed due solely to the fact that they are not served within the center or day care home’s established meal time periods. To learn more about hunger and satiety cues, see FNS’ *Feeding Infants: A Guide for Use in the Child Nutrition Programs*, available at <http://www.fns.usda.gov/tn/feeding-infants-guide-use-child-nutrition-programs>. FNS is updating the *Feeding Infants: A Guide for Use in the Child Nutrition Programs* to reflect the updated CACFP infant meal patterns.

### Creditable Infant Formulas

As part of offering a meal that is compliant with the CACFP infant meal pattern requirements, centers and day care homes with infants in their care must offer at least one type of iron-fortified infant formula (7 CFR 226.20(b)(2)). The Food and Drug Administration (FDA) defines iron-fortified infant formula as a product “which contains 1 milligram or more of iron in a quantity of product that supplies 100 kilocalories when prepared in accordance with label directions for infant consumption” (21 CFR 107.10(b)(4)(i)). The number of milligrams (mg) of iron per 100 kilocalories (calories) of formula can be found on the Nutrition Facts label of infant formulas.

Previously, FNS provided a list of *Iron-Fortified Infant Formulas That Do Not Require a Medical Statement*. FNS no longer maintains such a list due to the continuous development of new or re-formulated infant formula products. This makes maintaining an accurate, all-inclusive list impractical. Instead, the following criteria may be used to determine whether a formula is eligible for reimbursement:

1. Ensure that the formula is not an FDA Exempt Infant Formula. An exempt infant formula is an infant formula labeled for use by infants who have inborn errors of metabolism or low birth weight, or who otherwise have unusual medical or dietary problems, as defined in 21 CFR 107.3. More information and a list of FDA Exempt Infant Formulas can be found at:  
<http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/InfantFormula/ucm106456.htm>.

2. Look for “Infant Formula with Iron” or a similar statement on the front of the formula package. All iron-fortified infant formulas must have this type of statement on the package.
3. Use the Nutrition Facts label as a guide to ensure that the formula is iron-fortified. The nutritive values of each formula are listed on the product’s Nutrition Facts label. To be considered iron-fortified, an infant formula must have 1 mg of iron or more per 100 calories of formula when prepared in accordance with label directions.

Additionally, to be creditable for reimbursement, infant formula must meet the definition of an infant formula in section 201(z) of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 321(z))<sup>1</sup> and meet the requirements for an infant formula under section 412 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 350a)<sup>2</sup> and the regulations at 21 CFR parts 106 and 107<sup>3</sup>. Requiring an infant formula to be compliant with the FDA regulatory standards on infant formula is consistent with the Special Supplemental Nutrition Program for Women, Infants, and Children’s (WIC) infant formula requirements. It also ensures that all infant formulas served in the CACFP meet nutrient specifications and safety requirements. If a formula is purchased outside of the United States, it is likely that the formula is not regulated by the FDA. Infant formulas that are not regulated by the FDA are not creditable in the CACFP.

Formulas classified as Exempt Infant Formulas by FDA may be served as a part of a reimbursable meal if the substitution is due to a disability and is supported by a medical statement signed by a licensed physician or a State recognized medical authority. A State recognized medical authority for this purpose is a State licensed health care professional who is authorized to write medical prescriptions under State law. The statement must be submitted and kept on file by the center or day care home. For more information on providing meal accommodations for participants with disabilities, see CACFP 14-2017, SFSP 10-2017 *Modifications to Accommodate Disabilities in the Child and Adult Care Food Program and Summer Food Service Program* (<https://www.fns.usda.gov/modifications-accommodate-disabilities-cacfp-and-sfsp>)

State agencies should contact their FNS Regional Office when they are uncertain if an infant formula is creditable.

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<sup>1</sup> Section 201(z) of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 321(z)): <http://www.gpo.gov/fdsys/pkg/USCODE-2010-title21/pdf/USCODE-2010-title21-chap9-subchapII-sec321.pdf>

<sup>2</sup> Section 412 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 350a): <http://www.gpo.gov/fdsys/pkg/USCODE-2010-title21/pdf/USCODE-2010-title21-chap9-subchapIV-sec350a.pdf>

<sup>3</sup> 21 CFR parts 106 and 107: <http://www.ecfr.gov/cgi-bin/text-idx?gp=&SID=39344f21c8c795a9fc3f485db0aefeb9&mc=true&tpl=/ecfrbrowse/Title21/21CIsubchapB.tpl>

## **II. PARENT OR GUARDIAN PROVIDED BREASTMILK OR FORMULA**

An infant's parent or guardian may, at their discretion, decline the infant formula offered by the center or day care home and provide expressed breastmilk or a creditable infant formula instead. Meals containing parent or guardian provided expressed breastmilk or creditable infant formula that are served to the infant by the child care provider are eligible for reimbursement, including meals when an infant is only consuming breastmilk or infant formula. Additionally, in recognition of the numerous benefits of breastfeeding, and that the AAP recommends breastmilk as the optimal source of nutrients through the first year of life, centers and day care homes may claim reimbursement of meals when a mother directly breastfeeds her infant at the center or day care home. This includes meals when an infant is only consuming breastmilk. This added flexibility in the updated infant meal patterns became effective October 1, 2017 and is consistent with other FNS efforts, such as in WIC, to support and encourage breastfeeding. Therefore, meals when a mother directly breastfeeds her infant on-site are eligible for reimbursement.

While centers and day care homes must maintain menus to show what foods an infant is served, there is no Federal requirement to document the delivery method for breastmilk (e.g., if it was served in a bottle by the day care provider or if the mother breastfed on-site). A center or day care home may simply indicate on the menu that the infant was offered breastmilk. Additionally, centers and day care homes do not need to record the amount of breastmilk a mother directly breastfeeds her infant. Please see the Questions and Answers in the Attachment for more information and best practices for documenting infant meals.

When a parent or guardian chooses to provide breastmilk (expressed breastmilk or by directly breastfeeding on-site) or a creditable infant formula and the infant is consuming solid foods, the center or day care home must supply all the other required food components in order for the meal to be reimbursable.

### **Expressed Breastmilk Storage**

In the *Pediatric Nutrition Handbook, 7<sup>th</sup> Edition*, the AAP recommends an optimal storage time of 72 hours for refrigerated expressed breastmilk. Accordingly, to follow current scientific recommendations, breastmilk may be stored at the center or day care home in a refrigerator for up to 72 hours from the date the breastmilk was expressed. The previously established standard was 48 hours from the time it was collected. FNS made this change via policy guidance in 2015 to support breastfeeding practices and increase flexibility for centers and day care homes. Bottles of expressed breastmilk must be stored in a refrigerator kept at 40° Fahrenheit (4.4° Celsius) or below. This is consistent with recommendations from the AAP and the Centers for Disease Control and Prevention. Centers and day care homes should continue to follow all other breastmilk handling and storage guidelines listed in *Feeding Infants: A Guide for Child Nutrition Programs* (<http://www.fns.usda.gov/tn/feeding-infants-guide-use-child-nutrition-programs>).

### **III. SOLID FOODS (COMPLEMENTARY FOODS)**

The updated CACFP infant meal pattern includes two infant age groups: birth through the end of 5 months and the beginning of 6 months through the end of 11 months. These updated infant age groups are consistent with the infant age groups in the WIC program. In addition, the updated infant age groups will help delay the introduction of solid foods until around 6 months of age. It is important to delay the introduction of solid foods until around 6 months of age because most infants are typically not physiologically developed to consume solid foods until midway through the first year of life. According to the AAP, 6 to 8 months of age is often referred to as a critical window for initiating the introduction of solid foods to infants. In addition, by 7 to 8 months of age, infants should be consuming solid foods from all food groups (vegetables, fruits, grains, protein foods, and dairy).

Solid foods must be served to infants around 6 months of age, as it is developmentally appropriate for each individual infant. Once an infant is developmentally ready to accept solid foods, the center or day care home is required to offer them to the infant. FNS recognizes, though, that solid foods are introduced gradually, new foods may be introduced one at a time over the course of a few days, and an infant's eating patterns may change. For example, an infant may eat a cracker one week and not the next week. Centers and day care homes must follow the eating habits of infants. Meals should not be disallowed simply because one food was offered one day and not the next if that is consistent with the infant's eating habits. In addition, solid foods served to infants must be of a texture and consistency that is appropriate for the age and development of the infant being fed. Please see Question 2 under "III. SOLID FOODS" in the attached Questions and Answers for more information.

There is no single, direct signal to determine when an infant is developmentally ready to accept solid foods. An infant's readiness depends on his or her rate of development and infants develop at different rates. Centers and day care homes should be in constant communication with infants' parents or guardians about when and what solid foods to serve while the infant is in care. As a best practice, FNS recommends that parents or guardians request in writing when a center or day care home should start serving solid foods to their infant. When talking with parents or guardians about when to serve solid foods to infants in care, the following guidelines from the AAP can help determine if an infant is developmentally ready to begin eating solid foods:

- The infant is able to sit in a high chair, feeding seat, or infant seat with good head control;
- The infant opens his or her mouth when food comes his or her way. He or she may watch others eat, reach for food, and seem eager to be fed;
- The infant can move food from a spoon into his or her throat; and
- The infant has doubled his or her birth weight and weighs about 13 pounds or more.

Allowing solid foods to be served when the infant is developmentally ready (around 6 months of age) better accommodates infants' varying rates of development and allows centers and day care homes to work together with the infant's parents or guardians to determine when solid foods should be served. For more information and best practices on serving solid foods to infants,

please see *Feeding Infants: A Guide for Child Nutrition Programs* (<http://www.fns.usda.gov/tn/feeding-infants-guide-use-child-nutrition-programs>).

## **Vegetables and Fruits**

The primary goal of updating the CACFP meal patterns was to help children establish healthy eating patterns at an early age. Offering a variety of nutrient dense foods, including vegetables and fruits (cooked, mashed, pureed, or small diced as needed to obtain the appropriate texture and consistency), can help promote good nutritional status in infants. Additionally, the AAP recommends infants consume more vegetables and fruits. Vegetables and fruits are already required at breakfast, lunch, and supper meals for infants that are developmentally ready to accept them (around 6 months of age). To further help increase infants exposure and consumption of vegetables and fruits, the updated meal patterns requires vegetables and/or fruits be served at snack for infants that are developmentally ready to accept them. In addition, juice can no longer be served as part of a reimbursable meal for infants of any age under the updated meal patterns.

## **Grains**

To provide greater flexibility to the menu planner, the updated infant meal pattern allows ready-to-eat cereals to be served at snack for infants that are developmentally ready to accept them. All ready-to-eat cereals served to infants must meet the same sugar limit as breakfast cereals served to children and adults in the CACFP. This means, ready-to-eat cereals served to infants at snack must contain no more than 6 grams of sugar per dry ounce. As a reminder, ready-to-eat cereals must also be whole grain-rich, enriched, or fortified in order to be creditable in the CACFP. For more information on the breakfast cereal sugar limit and creditable grains, please see memorandum CACFP 01-2018: *Grain Requirements in the Child and Adult Care Food Program; Questions and Answers* (<https://www.fns.usda.gov/cacfp/grain-requirements-child-and-adult-care-food-program-questions-and-answers>). The flexibility to serve ready-to-eat cereals at infant snacks went into effect October 1, 2017.

## **Meat and Meat Alternates**

Meat and meat alternates are good sources of protein and provide essential nutrients for growing infants, such as iron and zinc. FNS acknowledges that yogurt is often served to infants as they are developmentally ready. In recognition of this, the updated infant meal pattern allows yogurt as a meat alternate for older infants who are developmentally ready to accept them. All yogurts served in the CACFP, including those served to infants, must contain no more than 23 grams of sugar per 6 ounces. In addition, the updated infant meal pattern no longer allows cheese food or cheese spread as creditable meat alternates. This is due to their higher sodium content, and the AAP recommends caregivers choose products lower in sodium. Regular cheese, however, is still creditable.

The updated infant meal patterns allow whole eggs as meat alternates. Previously, only egg yolks were creditable in the infant meal pattern because there were concerns with developing food allergies when infants are exposed to the protein in the egg white. However, the AAP recently concluded that there is no convincing evidence to delay the introduction of foods that are considered major food allergens, such as eggs.

Crediting yogurt and whole eggs as meat alternates and the disallowance of cheese food and cheese spread in the infant meal patterns went into effect October 1, 2017.

### **DHA Enriched Infant Foods**

Docosahexaenoic acid, known as DHA, is an omega-3 fatty acid that may be added to infant formulas and infant foods. While more research on the benefits of DHA and ARA (arachidonic acid, an omega-6 fatty acid) is needed, some studies suggest they may have positive effects on visual function and neural development.

Previously, serving any infant foods containing DHA was prohibited in the CACFP due to the concern that the source of DHA in infant foods, such as egg yolk, and other ingredients, additives, or extenders in those foods may result in a food sensitivity or a food allergy (CACFP memorandum *Baby Foods and Vegetables with DHA*, December 19, 2002). However, as stated in the section above, there is no current convincing evidence to warrant delaying the introduction of foods considered to be major food allergens. Therefore, FNS issued guidance in 2015 allowing infant foods containing DHA to be creditable in the CACFP infant meal pattern. Infant foods containing DHA may be served and claimed as part of a reimbursable meal, as long as they meet all other crediting requirements.

## **IV. COMPLIANCE**

As currently required, centers and day care homes must demonstrate that they are serving meals that meet the meal pattern requirements, including the infant meal pattern requirements outlined in this memorandum. Centers and day care homes must keep records of menus (7 CFR 226.15(e)(10)). However, State agencies have the authority to determine other types of acceptable recordkeeping documents (7 CFR 226.15(e)). To the extent practicable, State agencies should not impose additional paperwork requirements to demonstrate compliance with the updated meal pattern requirements for infants. Rather, FNS encourages State agencies to maintain current recordkeeping requirements or update existing forms to avoid any additional burden. For additional information on documenting meals, please see CACFP 17-2017: *Documenting Meals in the Child and Adult Care Food Program* (<https://www.fns.usda.gov/cacfp/documenting-meals-child-and-adult-care-food-program>).

Please see the Questions and Answers in the Attachment for examples of best practices for demonstrating compliance with the updated infant meal patterns.

**V. SUMMARY OF IMPLEMENTATION DATES**

Implementation Date	Requirement
Previously in Effect	<ul style="list-style-type: none"> <li>• Infant formula must be iron-fortified and regulated by FDA</li> <li>• Reimbursement of meals with parent or guardian provided expressed breastmilk or a creditable infant formula</li> <li>• Breastmilk may be stored in a refrigerator at a center or day care home (at 40° F or below) for up to 72 hours</li> <li>• Infant foods containing DHA are creditable</li> </ul>
Became Effective October 1, 2017	<ul style="list-style-type: none"> <li>• Reimbursement of meals when a mother breastfeeds her infant on-site</li> <li>• Yogurt and whole eggs are allowable meat alternates</li> <li>• Cheese food and cheese spread are not allowable meat alternates</li> <li>• Ready-to-eat cereals may be served at snack</li> <li>• Vegetables and/or fruits must be served at snack for infants that are developmentally ready to accept them (around 6 months of age)</li> <li>• Juice is not allowed as part of a reimbursable infant meal</li> </ul>

State agencies are reminded to distribute this information to Program operators immediately. Program operators should direct any questions regarding this memorandum to the appropriate State agency. State agency contact information is available at <https://www.fns.usda.gov/cacfp/cacfp-contacts>. State agencies should direct questions to the appropriate FNS Regional Office.



Angela Kline  
 Director  
 Policy and Program Development Division  
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Attachment

## Questions and Answers

New or updated questions are preceded by three asterisks (\*\*\*)

### I. GENERAL QUESTIONS

**1. \*\*\*What does it mean to feed an infant in a way that is “consistent with the infant’s eating habits”?**

CACFP centers and day care homes must offer all infants in their care meals that comply with the infant meal pattern requirements (7 CFR 226.20(b)). 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. This helps ensure that the infant gets the right amount of food for growth. This “on demand” feeding is considered better for the baby and is supported by FNS. Additionally, the quantity of food an infant consumes changes from feeding to feeding or day to day. 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. As a reminder, Program participants, including infants, do not need to consume the entire meal offered in order for the meal to be reimbursed.

**2. May a parent donate extra formula or food received through the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) to his or her infant’s center or day care home?**

A parent may provide one meal component for their own infant or infants, such as infant formula received through WIC. However, parents or guardians cannot donate formula or food they receive through WIC to the center or day care home for general use. Parents or guardians with formula or food received through WIC that their infant has not consumed should be referred back to their WIC program for guidance.

**3. Why are parents or guardians no longer allowed to provide the majority of the meal components for infants in the updated infant meal patterns?**

FNS made this change to help maintain the integrity of the CACFP. The previous infant meal patterns allow parents or guardians to supply all but one of the required components of a reimbursable meal. Under the updated infant meal patterns, parents or guardians may only supply one component of a reimbursable meal. FNS recognizes that infants have unique dietary needs and parents or guardians are often most in touch with their infant's dietary preferences. However, this change will help ensure that centers and day care homes are not encouraging or requiring parents or guardians to supply the food in order to reduce costs.

**4. What food components can a parent or guardian provide for their infants?**

Parents or guardians may choose to provide any one of the required food components in the updated CACFP infant meal patterns, as long as this is in compliance with local health codes. A parent or guardian may choose to supply expressed breastmilk or a creditable infant formula, even when the infant is only consuming breastmilk or infant formula. And, a mother may directly breastfeed her infant on-site and the meal will be reimbursable.

If an infant is developmentally ready to consume solid foods and the parent or guardian chooses to supply expressed breastmilk or a creditable infant formula or directly breastfeed on-site, then the center or day care home must provide all the other required food components in order for the meal to be reimbursable. Alternatively, a parent or guardian may choose to provide a solid food component if the infant is developmentally ready to consume solid foods. In this situation, the center or day care home must supply all the other required food components, including iron-fortified infant formula.

State agencies and sponsoring organizations must ensure that the parent or guardian is truly choosing to provide the preferred component and that the center or day care home has not requested or required the parent or guardian to provide the components in order to complete the meal and reduce costs.

**5. An infant is breastfeeding and the parent wants the infant to be fed organic vegetables, but the food the day care home serves is not organic. Therefore, the parent decides to provide food for their infant while the infant is in care. Can the day care home claim those meals for reimbursement?**

No. This is because the parent is providing more than one food component: breastmilk and solid foods. Under the updated infant meal pattern requirements, parents and guardians may only provide one component of a reimbursable meal.

**6. \*\*\*How should centers and day care homes document infant menus when the items each infant eats vary so much?**

Centers and day care homes must keep records of menus and State agencies have the discretion to determine how best to document the varying meals infants are offered. As a reminder, centers and day care homes will need to vary the foods served to each infant based on the infant’s developmental readiness. All infants must be served breastmilk or infant formula, but not all infants should be served solid foods unless they are developmentally ready.

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.

FNS encourages State agencies to avoid additional paperwork requirements to the extent practicable to demonstrate compliance with the updated infant meal pattern requirements. State agencies should maintain current recordkeeping requirements or update existing forms to avoid any additional burden. As part of this effort, CACFP State agencies may want to consider collaborating with their State child care licensing agency to develop a menu template that satisfies both the CACFP and child care licensing requirements. This will help reduce burden on centers and day care homes while maintaining the integrity of the CACFP. For example, some licensing agencies may require centers and day care homes to provide parents daily records of what their infant consumed during care. CACFP State agencies could work with their State child care licensing agency to explore ways to use the daily parent records to also meet the CACFP requirements.

**II. BREASTMILK AND INFANT FORMULA**

**1. Do CACFP infant formulas have to be approved by the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)?**

No. CACFP infant formulas do not have to be approved by WIC. WIC’s infant formula requirements vary slightly from CACFP’s, including a higher iron requirement (1.5 mg of iron per 100 calories). Therefore, some infant formulas that may be creditable in the CACFP, such as infant formulas with 1 mg of iron per 100 calories, may not be eligible in WIC.

**2. What is an “iron-fortified” infant formula?**

The Food and Drug Administration considers an infant formula to be “iron-fortified” if it has 1 milligram of iron or more per 100 kilocalories. A “low-iron” infant formula has less than 1 milligram of iron per 100 kilocalories. The American Academy of Pediatrics recommends formula-fed infants receive iron-fortified infant formula to prevent iron-deficiency anemia

**3. When an infant receives both breastmilk and formula, is the meal eligible for reimbursement?**

Yes. Meals served to infants (birth through 11 months of age) may contain iron-fortified infant formula, breastmilk (including expressed breastmilk and a mother directly breastfeeding on-site), or a combination of both.

**4. \*\*\*How should meals be documented when a mother directly breastfeeds her infant on-site?**

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. Ultimately, State agencies have the discretion to determine what is acceptable.

FNS strongly emphasizes that State agencies should not undertake any new paperwork requirements to ensure compliance with the updated infant meal patterns to avoid adding unnecessary administrative burdens to the CACFP operators. Additionally, CACFP State agencies may want to consider collaborating with their State child care licensing agency to develop a menu template that satisfies both the CACFP and child care licensing requirements. This will help reduce burden on centers and day care homes while maintaining the integrity of the CACFP.

**5. 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?**

Yes. Centers and day care homes are strongly encouraged, but not required, to offer a quiet, private area that is comfortable and sanitary for mothers who come to the center or day care home to breastfeed. However, 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.

**6. 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”?**

A center or day care home provider, or any other 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. The provider or other staff member can breastfeed her infant while she is working, during a break, or during off-work hours. Whether a provider or other staff member is “on the clock” when she breastfeeds her infant is a business decision to be made by the center or day care home. As long as the provider or staff member breastfeeds her infant on-site and the infant is enrolled for care, the meal can be claimed for reimbursement, including when she is working, on a break, or during off-work hours.

**7. 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?**

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. Infants do not eat on a strict schedule and the quantity of food an infant consumes changes from feeding to feeding or day to day. Infants should not be force fed. Infants need to be fed during a span of time that is consistent with the infant’s eating habits. Therefore, there may be times when an infant does not consume the entire serving size that is offered.

In particular, some infants who 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 (7 CFR 226.20(b)(2)(ii)). This flexibility encourages breastfeeding and helps prevent wasting expressed breastmilk.

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

For children younger than 12 months of age, cow’s milk may be served as a substitute for breastmilk and/or infant formula, and be part of a reimbursable meal, if the substitution is supported by a medical statement signed by a licensed physician or a State recognized medical authority. A State recognized medical authority for this purpose is a State licensed health care professional who is authorized to write medical prescriptions under State law. The statement should include a description of the infant’s physical or mental impairment and an explanation of how to modify the meal or meal service to accommodate the infant’s disability. The statement must be submitted and kept on file by the center or day care home. For more information on providing meal accommodations for participants with disabilities, please see CACFP 14-2017, SFSP 10-2017, *Modifications to Accommodate Disabilities in the Child and Adult Care Food Program and Summer Food Service Program* (<https://www.fns.usda.gov/modifications-accommodate-disabilities-cacfp-and-sfsp>).

FNS recognizes that infants have unique dietary needs and that decisions concerning diet during the first year of life are for the infant’s health care provider and parents or guardians to make together. In addition, FNS understands that a transition period is needed when infants are weaned from breastmilk or infant formula to cow’s milk. Therefore, a one month

transition period is allowed for children 12 to 13 months of age. Please see question number 13 for more information.

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

Yes. Breastmilk is an allowable substitute for fluid milk for children of any age. Therefore, if a mother chooses to breastfeed her infant past 1 year of age she may breastfeed the child on-site or provide expressed breastmilk and the center or day care home may claim reimbursement for those meals.

**10. Must a parent submit a written request to substitute breastmilk for fluid milk for children 1 year of age or older? Does it matter if the substituted breastmilk is expressed or breastfed?**

No. If a parent wants their child (one year old or older) to be served breastmilk in place of fluid milk a written request is not required. This is true no matter the delivery method. Therefore, a parent may provide expressed breastmilk for his or her child or a mother may breastfeed her child on-site and the parent does not need to provide a note.

**11. If a mother breastfeeds her 13 month old, or older, child at the center or day care home prior to or after a meal service, which meal is it counted towards?**

When a mother breastfeeds her 13 month old, or older, 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.

**12. \*\*\*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?**

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. Please note, in this situation the center or day care home must provide all other required food components in order for the meal to be reimbursable. FNS encourages centers and day care homes talk to parents or guardians about supplementing breastmilk with whole milk prior to doing so.

**13. \*\*\*Are meals served to children 12 months and older reimbursable if they contain infant formula?**

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. A State recognized medical authority for this purpose is a State licensed health care professional who is authorized to write medical prescriptions under State law. The statement should include a description of the infant's physical or mental impairment and an explanation of how to modify the meal or meal service to accommodate the infant's disability. The statement must be submitted and kept on file by the center or day care home. For more information on providing meal accommodations for participants with disabilities, please see CACFP 14-2017, SFSP 10-2017 *Modifications to Accommodate Disabilities in the Child and Adult Care Food Program and Summer Food Service Program* (<https://www.fns.usda.gov/modifications-accommodate-disabilities-cacfp-and-sfsp>).

**14. \*\*\*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?**

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 medical statement should include a description of the infant's physical or mental impairment and an explanation of how to modify the meal or meal service to accommodate the infant's disability. The statement must be signed by a licensed physician or a State recognized medical authority. A State recognized medical authority for this purpose is a State licensed health care professional who is authorized to write medical prescriptions under State law. The statement must be submitted and kept on file by the center or day care home. For more information on providing meal accommodations for participants with disabilities, please see CACFP 14-2017, SFSP 10-2017 *Modifications to Accommodate Disabilities in the Child and Adult Care Food Program and Summer Food Service Program* (<https://www.fns.usda.gov/modifications-accommodate-disabilities-cacfp-and-sfsp>).

**15. 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?**

If a parent or guardian declines the iron-fortified infant formula that the center or day care home offers and he or she chooses to provide his or her 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 (i.e., it is iron-fortified and is regulated by FDA). As a best practice, 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

**16. Can iron-fortified infant formula and iron-fortified infant cereal credit towards a reimbursable meal when they are used in a pancake or muffin recipe?**

When using iron-fortified infant formula and iron-fortified infant cereal for making pancakes, muffins, or other grain foods, the iron-fortified infant cereal in these types of recipes can credit toward a reimbursable meal. However, the iron-fortified infant formula cannot credit towards a reimbursable meal when used in these types of recipes. Iron-fortified infant formula and breastmilk are only creditable when served as a beverage.

**III. SOLID FOODS**

**1. \*\*\* If an infant is just starting to be introduced to solid foods, such as infant cereal, does the center or day care home have to serve that solid food at every meal where that component is required?**

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 vegetables and fruit, until the infant has established a tolerance for that solid food component at multiple feedings per day. It is important to remember that the quantity of food an infant consumes changes from feeding to feeding or day to day. Infants may want to eat less food when teething or not feeling well and more food on days when they have a very good appetite.

**2. \*\*\*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?**

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. The American Academy of Pediatrics states that it can take over ten tastes of a food before the child accepts it. If the infant refuses the food, that is okay. The meal is still reimbursable. Offering infants a variety of food over the course of the week helps them get the nutrition they need. It can take time for infants to be introduced to and accept a variety of foods

**3. Can solid foods be served to infants younger than 6 months of age?**

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 his or her 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. Centers and day care homes are required to serve solid foods once an infant is ready to accept them. In general, infants should be consuming solid foods from all food groups (vegetables, fruits, grains, protein foods, and dairy) by 7 to 8 months of age.

**4. If parents and the child care provider are in agreement that a five month old infant is developmentally ready to start eating some solid foods, such as applesauce, may the child care provider still claim reimbursement for those meals with solid foods?**

Yes. If an infant is developmentally ready to accept solid foods prior to 6 months of age, the center or day care home may serve the solid foods and claim reimbursement for those meals. Most infants are not developmentally ready to accept solid foods until around 6 months of age; however, infants develop at different rates. Centers and day care homes should talk about the introduction of solid foods with infants' parents or guardians and can share the signs for developmental readiness discussed in the body of this memorandum.

**5. \*\*\*What documentation is required when solid foods are served prior to 6 months of age?**

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. Please see Question 6 under "I. GENERAL QUESTIONS" for more guidance on infant menus. Otherwise, there are no additional Federal documentation requirements for serving solid foods prior to 6 months of age. As a best practice, FNS encourages centers and day care homes to work closely with each infant's parents and guardians and to obtain a written note from the parents or guardians indicating that solid foods should be served to the infant while in care. In addition, it is good practice for center and day care home providers to check with parents or guardians of all infants to learn about any concerns of possible allergies and their preference on how and what solid foods are introduced while the infant is in care.

**6. At what age should monitors expect to see infants being served all the solid food components for each meal and snack?**

The American Academy of Pediatrics (AAP) recommends introducing solid foods to infants around six months of age. In addition, the AAP recommends that by 7 or 8 months of age, infants should be consuming solid foods from all food groups (vegetables, fruits, grains, protein foods, and dairy). However, it is important to keep in mind that infants develop at different rates. Not all infants will be eating solid foods at 6 months of age, nor will all infants be eating solid foods from each food group by 7 or 8 months of age. 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.

**7. What should a monitor do when conducting an on-site review and he/she finds an 8 month old infant is not being served solid foods?**

The monitor should speak with the center or day care home provider to understand why the infant is not being served solid foods. Infants are typically developmentally ready to consume solid foods by 8 months of age; however, each infant develops at his or her own rate. If an 8 month old infant is not developmentally ready for solid foods and the center or day care home is serving the required minimum serving size for breastmilk or infant formula for the 6 through 11 month old age group, the meal is reimbursable. Monitors can remind center and day care home providers to work with each infant's parents or guardians to determine when and what solid foods should be served to the infant while he or she is in care.

**8. 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?**

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 guardians 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 care. Child care providers should be in constant communication with the infant's parents or guardians about the infant's eating habits as well as when and what solid foods should be served while the infant is in their 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, the meals are still reimbursable.

**9. \*\*\*Are foods that are considered to be a major food allergen or foods that contain these major food allergens allowed for infant meals?**

Foods that contain one or more of the eight major food allergens identified by the FDA (milk, egg, fish, shellfish, tree nuts, peanuts, wheat, and soybeans), 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. Previously, only egg yolks were allowed due to concerns with developing food allergies when infants are exposed to the protein in egg whites.

Even though most food allergies cause relatively mild and minor symptoms, some food allergies can cause severe reactions, possibly life-threatening. With this in mind, 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.

**10. Are tofu and soy yogurt allowed in the infant meal pattern?**

No. Tofu and soy yogurt are only allowed as a meat alternate in the child and adult meal patterns. Allowable meat/meat alternates in the infant meal pattern are meat, poultry, fish, dry beans and peas, whole eggs, cheese, cottage cheese, and yogurt. This is consistent with the National Academy of Medicine's report, which only recommended tofu as a meat alternate for children and adult participants.

**11. \*\*\*Is yogurt creditable in the infant meal pattern?**

Yes. Under the updated meal patterns, 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. FNS' training worksheet "Choose Yogurts That Are Lower in Added Sugar" is a good resource for identifying yogurts within the sugar limit. The worksheet includes a chart with common yogurt serving sizes and the maximum amount of sugar the yogurt may contain per serving (<https://www.fns.usda.gov/tn/cacfp-meal-pattern-training-tools>). Yogurt is a good source of protein and the American Academy of Pediatrics recommends infants consume foods from all food groups to meet infants' nutritional needs. Please note, though, that soy yogurt is not allowed in the infant meal pattern; see Question 10 above.

FNS is updating the *Feeding Infants: A Guide for Child Nutrition Programs* (<http://www.fns.usda.gov/tn/feeding-infants-guide-use-child-nutrition-programs>) to reflect the updated infant meal pattern requirements.

**12. \*\*\*Are chicken nuggets creditable in the infant meal pattern?**

Processed meats and poultry such as chicken nuggets, hot dogs (frankfurters), infant meat and poultry sticks (not dried or semi-dried, not jerky), fish sticks, and sausage may be part of a reimbursable meal. However, they are not recommended. The American Academy of Pediatrics recommends limiting these foods because they are higher in sodium than other meat products. 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.

These foods were not previously creditable towards the infant meal patterns due to the risk of choking. For example, sausage cut into rounds can cause 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. All foods served to infants must be prepared in the appropriate texture and consistency for the age and development of the infant being fed. Allowing these foods to credit towards a reimbursable infant meal offers greater flexibility to the menu planner. 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. Additionally, only the chicken and fish portion, not the breaded portion, of chicken nuggets and fish sticks are creditable as a meat.

**13. \*\*\*Can reimbursable infant meals and snacks contain foods that are deep-fat fried on-site?**

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 (7 CFR 226.20(d)). 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.

FNS strongly discourages centers and day care homes from serving any type of deep-fat fried foods to infants. Once developmentally ready, infants benefit from being introduced to a variety of food textures, aromas, and flavors. However, along with considering the infant's developmental readiness, centers and day care homes should take into consideration the overall nutritional value of a food and how it contributes to the development of healthy eating habits prior to serving the food. Deep-fat fried foods are often high in calories and solid fats.

**14. \*\*\*Is there a whole grain-rich requirement for infants?**

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. Centers and day care homes are encouraged to serve whole grain-rich foods to infants to promote acceptance of those foods later in life.

**15. \*\*\*What are "ready-to-eat" cereals?**

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. Oatmeal, steel cut oats, grits (enriched), and instant cereals are not ready-to-eat cereals. Only ready-to-eat cereals, as developmentally appropriate, are allowed at snack under the infant meal pattern.

**16. Is there a sugar limit for ready-to-eat cereals served to infants?**

Yes. Starting October 1, 2017 all breakfast cereals, including ready-to-eat cereals, served in the CACFP must contain no more than 6 grams of sugar per dry ounce (21 grams of sugar per 100 grams of dry cereal).

**17. \*\*\*What is the minimum amount of iron an infant cereal must contain in order to be considered “iron-fortified”?**

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.

**18. \*\*\*Can infant cereal be served in a bottle to infants?**

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. Please see CACFP 14-2017, SFSP 10-2017 *Modifications to Accommodate Disabilities in the Child and Adult Care Food Program and Summer Food Service Program* (<https://www.fns.usda.gov/modifications-accommodate-disabilities-cacfp-and-sfsp>) for more information about providing meal accommodations for participants with disabilities.

**19. \*\*\*Are cereals with honey creditable in the infant meal pattern?**

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.

**20. \*\*\*Are mixed or combination infant foods reimbursable in the infant meal pattern?**

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, that the food is the appropriate texture to prevent choking, and that the food is not high in added sugars, fats, or sodium. Be aware that some mixed dishes may contain foods that do not credit towards the infant meal pattern, such as rice or pasta.

With that in mind, FNS encourages centers and day care homes to only serve foods with more than one food component to older infants with well-established solid food eating habits.

**21. Are baby pouch food products allowed in CACFP?**

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.

Providers should serve food from a pouch in the same way that it is served from a jar or plastic container, which is by using a spoon. Spoon-feeding is the most appropriate method for feeding pureed or mashed foods to infants. Infants benefit developmentally from the experience of eating from a spoon. Different tongue and lip motions are used for sucking than for eating from a spoon. Additionally, the American Academy of Pediatric Dentistry warns that sucking on baby food pouches may have the same negative effect as the practice of prolonged sucking of juice from bottles or sippy cups.



Food and  
Nutrition  
Service

DATE: October 19, 2017

MEMO CODE: SP 01-2018

Park Office  
Center

SUBJECT: Updated Infant and Preschool Meal Patterns in the National School Lunch Program and School Breakfast Program; Questions and Answers

3101 Park  
Center Drive  
Alexandria  
VA 22302

TO: Regional Directors  
Special Nutrition Programs  
All Regions

State Directors  
Child Nutrition Programs  
All States

On April 25, 2016, the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) published the final rule, "Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010" (81 FR 24348) to update the National School Lunch Program's and School Breakfast Program's (School Meal Programs) meal pattern requirements for infants and preschoolers under 7 CFR 210.10 and 220.8. The purpose of this memorandum is to provide all provisions of the rule that apply to schools in one document for easy reference. The memorandum also includes Questions and Answers in Attachment B. Schools serving meals to infants and children ages 1 through 4 years old (preschoolers) must comply with these updated meal pattern requirements no later than October 1, 2017. This memorandum supersedes SP 35-2011, CACFP 23-2011, *Clarification on the Use of Offer Versus Serve and Family Style Meal Service*, May 17, 2011, as it applies to the School Meal Programs.

While many of the changes to the infant and preschool meal patterns make them more consistent with the requirements for older grade groups (K through 12<sup>th</sup> grade), some of the meal pattern requirements for infants and preschoolers are different. The infant and preschool meal patterns are specifically designed for this younger age group and their nutritional needs. Taste preferences are formed early in a child's life and meals served to infants and preschoolers are a critical part of establishing healthy habits that will last a lifetime. With this in mind, the updated infant and preschool meal patterns ensure the meals provided in the School Meal Programs contribute to children's wellness, healthy growth, and development. To assist schools in the transition to the updated meal patterns, FNS compiled a chart that highlights the primary differences between the preschool meal patterns and older grade meal patterns in Attachment A.

## **I. INFANT MEAL PATTERNS**

The key changes to the infant meal patterns include:

- Two age groups (birth through 5 months and 6 through 11 months), simplified from three age groups;
- The introduction of solid foods is delayed from 4 months of age to 6 months of age (as developmentally appropriate);
- Juice, cheese food, and cheese spread are no longer creditable;
- Yogurt is creditable as a meat alternate;
- Whole eggs are creditable as a meat alternate;
- Ready-to-eat cereals may be served at snack;
- Meals may be reimbursed when a mother chooses to directly breastfeed her infant on-site; and
- Deep fat-fried foods (cooked by submerging in hot oil or other fat) that are prepared on-site cannot be part of a reimbursable meal.

The updated infant meal patterns for lunch and afterschool snack are established under 7 CFR 210.10(q) and (o)(4), respectively. The updated infant meal pattern for breakfast is established under 7 CFR 220.8(p).

The infant meal pattern requirements in the School Meal Programs are the same as the infant meal pattern requirements in the Child and Adult Care Food Program (CACFP) under 7 CFR 226.20(b). Therefore, schools serving meals or afterschool snacks to infants should refer to memorandum CACFP 02-2018, *Feeding Infants and Meal Pattern Requirements in the Child and Adult Care Food Program; Questions and Answers* (<https://www.fns.usda.gov/cacfp/feeding-infants-and-meal-pattern-requirements-child-and-adult-care-food-program-questions-1>) for additional guidance. The memorandum describes the requirements for creditable infant formula, breastfeeding on-site, serving solid foods, parent or guardian provided components, and offers a comprehensive list of questions and answers. All of the requirements outlined in CACFP 02-2018 apply to schools serving meals and snacks to infants.

## **II. PRESCHOOL MEAL PATTERNS**

### **Fluid Milk Requirements**

#### *One Year Olds*

Under the updated preschool meal patterns, 1 year old children must be served whole, unflavored milk. This is consistent with recommendations from the National Academy of Medicine. FNS understands that a transition period is needed when infants are weaned from breastmilk or infant formula to cow's milk. Therefore, a one month transition period is allowed for children 12 to 13 months of age to allow them time to adjust to cow's milk.

Please note, breastmilk is considered an allowable fluid milk substitute for children of any age, if a mother chooses to breastfeed her child past 1 year of age.

### *Preschoolers 2 Years Old Through 4 Years Old*

Under the updated preschool meal patterns, milk served to children 2 years old through 4 years old must be unflavored low-fat (1 percent) or unflavored fat-free (skim) milk. Unflavored milk contains all the major nutrients also found in flavored milk. However, flavored milk (commercially prepared and plain milk that is flavored with syrup, powder, or straws) also contains added sugars. To better align with the Dietary Guidelines' recommendation to reduce the consumption of added sugar and to help children develop healthy eating practices, flavored milk is no longer allowed in reimbursable meals for preschoolers.

Allowable milks for preschoolers 2 years old through 4 years old include low-fat or fat-free milk, low-fat or fat-free lactose reduced milk, low-fat or fat-free lactose free milk, low-fat or fat-free buttermilk, low-fat or fat-free cultured milk, or low-fat or fat-free acidified milk. FNS recognizes that switching immediately from whole milk to low-fat or fat-free milk when a child turns 2 years old may be challenging. For that reason, FNS is granting a one-month transition period. Meals served to preschoolers 24 months to 25 months old that contain whole milk or reduced-fat milk (2 percent) may be part of a reimbursable meal.

As currently required, milk must be pasteurized fluid milk that meets State and local standards. Schools are not required to offer a variety of milks when serving meals to preschoolers. In addition, schools continue to have the flexibility to serve non-dairy beverages to preschoolers who cannot consume fluid milk due to a non-disability need, upon parent or guardian request.

For more information on the fluid milk and non-dairy beverage requirements for children 1 through 4 years old, please refer to memorandum CACFP 17-2018, *Nutrition Requirements for Fluid Milk and Fluid Milk Substitutions in the Child and Adult Care Food Program, Questions and Answers* (<https://www.fns.usda.gov/cacfp/nutrition-requirements-fluid-milk-and-fluid-milk-substitutions-cacfp-qas>). The fluid milk and non-dairy beverage requirements for 1 through 4 year old children outlined in CACFP XX-2017, also apply to schools serving meals and snacks to preschoolers.

## **Grain Requirements**

### *Whole Grain-Rich*

At least one serving of grains per day must be whole grain-rich under the updated preschool meal patterns. Whole grain-rich foods are foods that contain 100 percent whole grains or that contain at least 50 percent whole grains and the remaining grains in the food are enriched. This requirement does not apply to the infant meal patterns. Schools are

encouraged to serve whole grain-rich foods to infants to promote acceptance of those foods later in life.

For more information on how to identify foods that meet the whole grain-rich criteria in the preschool meal patterns, please refer to memorandum CACFP 01-2018, *Grain Requirements in the Child and Adult Care Food Program; Questions and Answers* (<https://www.fns.usda.gov/cacfp/grain-requirements-child-and-adult-care-food-program-questions-and-answers>).

### *Grain-Based Desserts*

The Dietary Guidelines recommend limiting consumption of added sugars and saturated fats as part of a healthy eating pattern, and identify grain-based desserts as sources of added sugars and saturated fats. To better align the infant and preschool meal patterns with the Dietary Guidelines, grain-based desserts cannot count towards the grain requirement at any meal or snack under the updated preschool meal patterns. This will help reduce the amount of added sugars and saturated fats children consume, which, as a percent of calories, is particularly high in children.

The exclusion of grain-based desserts for infants and preschoolers is slightly different from the grain-based dessert requirement for older grade groups in the School Meal Programs. Up to 2 ounce equivalents of grain-based desserts per week at lunch are allowed for older grade groups. These requirements vary slightly from each other because research indicates that flavor and food preferences are shaped early in life. Therefore, it is important to help establish healthy habits in the School Meal Programs' youngest participants when their taste preferences are being developed.

FNS recognizes that schools may occasionally want to serve grain-based desserts to preschoolers, such as for celebrations or other special occasions. It is important to remember that schools continue to have the flexibility to serve grain-based desserts as an additional food item that is not part of a reimbursable meal.

Grain-based desserts are those items that are denoted with a superscript 3 or 4 in "Exhibit A: Grain Requirement for Child Nutrition Programs" (Exhibit A) in CACFP 16-2017, *Grain-Based Desserts in the Child and Adult Care Food Program* (<https://www.fns.usda.gov/cacfp/grain-based-desserts-child-and-adult-care-food-program>). The following foods are considered grain-based desserts: cookies, sweet pie crusts, doughnuts, cereal bars, breakfast bars, granola bars, sweet rolls, toaster pastries, cake, and brownies. Please note, sweet crackers (e.g. graham and animal crackers) are not considered grain-based desserts in the infant and preschool meal patterns. FNS provided this flexibility in policy memorandum CACFP 16-2017, *Grain-Based Desserts in the Child and Adult Care Food Program* (<https://www.fns.usda.gov/cacfp/grain-based-desserts-child-and-adult-care-food-program>) and is applicable to the School Meal Programs' infant and preschool meal patterns.

If a menu planner is thinking about serving a grain that is not specifically identified in Exhibit A, he or she should consider the common perception of the grain and if it is viewed as a dessert, sweet item, or treat. In these situations, menu planners should work with their State agency to determine if the grain is considered a grain-based dessert. Menu planners should also be aware that even if a product is not labeled as a traditional dessert item, it may contain higher levels of added sugars or saturated fats. Menu planners should use their discretion when serving these foods.

### *Breakfast Cereals*

Beginning October 1, 2017, breakfast cereals served to infants and preschoolers must contain no more than 6 grams of sugar per dry ounce (21.2 grams of sugar per 100 grams of dry cereal). Breakfast cereals include ready-to-eat cereals and instant and hot cereals. However, only ready-to-eat cereals are creditable in the infant meal patterns. Infant cereals are not considered breakfast cereals. This new requirement will help further reduce infants' and preschoolers' intake of added sugars, as recommended by the Dietary Guidelines.

There are several ways to determine if a breakfast cereal is within the sugar limit. Schools may use any of the following methods to determine if a breakfast cereal meets the sugar limit:

1. Use any State agency's Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) approved breakfast cereal list. Similar to CACFP, all WIC-approved breakfast cereals must contain no more than 6 grams of sugar per dry ounce (21.2 grams of sugar per 100 grams of dry cereal).
2. Use 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>). The worksheet includes a chart with common breakfast cereal serving sizes and the maximum amount of sugar the breakfast cereal may contain per serving.
3. Use the Nutrition Facts Label on the breakfast cereal packaging to calculate the sugar content per dry ounce.
  - First, find the serving size in grams at the top of the Label and the sugars listed towards the middle.
  - Next, divide the total sugars by the serving size in grams.
  - If the answer is equal to or less than 0.212, then the cereal is within the required sugar limit and may be creditable.
4. Use an FNS-provided alternate calculation that uses rounding and aligns with the Team Nutrition training worksheet noted above:
  - First, find the serving size in grams at the top of the Label.

- Multiply the serving size in grams by 0.212.
- 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. For example, if the answer in step 2 is 4.24, it is rounded down to 4.
- Next, find the Sugars listed towards the middle of the Nutrition Facts Label.
- 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.

As long as a breakfast cereal meets the sugar limit using at least one of the methods described above, it is considered within the sugar limit. As a reminder, breakfast cereals must meet the sugar limit and be whole grain-rich, enriched, or fortified to be creditable in the infant and preschool meal patterns.

For more information on the breakfast cereal sugar limit, including questions and answers, please see CACFP 01-2018, *Grain Requirements in the Child and Adult Care Food Program; Questions and Answers* (<https://www.fns.usda.gov/cacfp/grain-requirements-child-and-adult-care-food-program-questions-and-answers>).

### *Ounce Equivalents*

Beginning October 1, 2019, grains in the infant and preschool meal patterns will be credited using ounce equivalents instead of “servings.” While FNS is not requiring the use of ounce equivalents until October 1, 2019, schools may use ounce equivalents 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. Schools may refer to the Exhibit A in CACFP 16-2017, *Grain-Based Desserts in the Child and Adult Care Food Program* (<https://www.fns.usda.gov/cacfp/grain-based-desserts-child-and-adult-care-food-program>) for the appropriate ounce equivalent serving sizes.

## **Vegetable and Fruit Requirements**

### *Components*

In the updated preschool meal patterns, there are separate vegetable and fruit components at lunch and afterschool snacks. Separate vegetable and fruit components at lunch and afterschool snack will help increase the variety of vegetables and fruits served and consumed by preschoolers, as recommended by the Dietary Guidelines. This change means that preschoolers are served a vegetable and a fruit at lunch, consistent with the meal

pattern for older grade groups. In addition, an afterschool snack with a vegetable and fruit in the appropriate minimum serving sizes is now reimbursable.

To increase flexibility in menu planning, schools may choose to serve preschoolers two vegetables at lunch, rather than a serving of vegetables and a serving of fruit. For example, the fruit component at lunch may be substituted by an additional vegetable as long as the substituted vegetable is at least the same serving size as the fruit it replaced. When two vegetables are served at lunch, they must be two different kinds of vegetables. However, because there are no vegetable subgroup requirements in the preschool meal patterns, the two different kinds of vegetables do not need to be from different vegetable subgroups (e.g., dark green vegetables, red/orange vegetables, starchy vegetables, beans and peas (legumes), and other vegetables). For example, a preschool lunch with a serving of carrots and a serving of red peppers (both in the red and orange vegetable subgroup) would be allowable. Please note, schools may not serve two fruits at lunch under the updated preschool meal patterns.

Vegetables and fruits are one combined component at breakfast meals served to preschoolers. Similar to the School Breakfast Program (SBP) meal pattern requirements for older grade groups, schools may choose to serve vegetables, fruits, or a combination of both at breakfast for preschoolers. However, unlike SBP, there are no vegetable subgroup requirements in the preschool breakfast meal pattern.

### *Juice*

Under the updated preschool meal patterns, full-strength (100 percent) fruit juice or full-strength (100 percent) vegetable juice may be used to meet the entire vegetable or fruit requirement at only one meal or snack per day. For example, if a school serves preschoolers breakfast and lunch, juice may be served at either breakfast or lunch, but not at both meals. Please see Question 2 and 3 in the attached Questions and Answers for more information about serving juice. Additionally, please be aware that the juice limit for preschoolers is different from the juice limit for older grade groups in the School Meal Programs. For all older grade groups, juice may be used to meet no more than one-half of the weekly fruit or vegetable requirement.

The limits on juice in the CNPs are based on the Dietary Guidelines' recommendation that at least half of the fruits consumed per day should come from whole fruits (fresh, canned, frozen, or dried). While 100 percent juice can be part of a healthful diet, it lacks the dietary fiber found in whole vegetables and fruits and, when consumed in excess, it can contribute to extra calories.

For more information on the separate vegetable and fruit components at lunch and afterschool snack and the juice limit, please see memorandum CACFP 09-2017, *Vegetable and Fruit Requirements in the Child and Adult Care Food Program; Questions and Answers* (<https://www.fns.usda.gov/cacfp/vegetable-and-fruit-requirements-cacfp-qas>). Because the infant and preschool meal patterns in the School Meal Programs match the

CACFP meal pattern requirements for these respective age groups, CACFP 09-2017 also applies to the School Meal Programs' infant and preschool meal patterns.

### **Meat/Meat Alternate Requirements**

#### *Tofu and Soy Yogurt*

To better serve diverse populations, offer greater flexibility to the menu planner, and to be consistent with older grade groups, tofu and soy yogurt products are allowed as meat alternates under the updated preschool meal patterns. The Dietary Guidelines notes that the consumption of a balanced variety of protein foods, including plant-based protein sources (e.g., tofu and soy yogurt) can contribute to improved nutrient intake and health benefits.

For more information on how to credit tofu and soy yogurt products as a meat alternate, please see memorandum SP 53-2016, CACFP 21-2016, *Crediting Tofu and Soy Yogurt Products in the School Meal Programs and the Child and Adult Care Food Program* (<https://www.fns.usda.gov/crediting-tofu-and-soy-yogurt-products-school-meal-programs-and-cacfp>). Tofu and soy yogurt products are not allowed as meat alternates in the infant meal pattern.

#### *Yogurt Sugar Limit*

To help reduce infants' and preschoolers' consumption of added sugars, yogurt (including soy yogurt) must contain no more than 23 grams of sugar per 6 ounces under the updated infant and preschool meal patterns. Yogurt provides nutrients that are vital for health, growth, and maintenance of the body, including calcium, potassium, and vitamin D (when fortified). These beneficial nutrients can be "diluted" by the addition of calories from added sugars. In addition, food preferences, including a preference for sweet foods, are established at a young age. Requiring a sugar limit on yogurt reinforces that yogurt can be part of a healthful diet with less sugar.

Yogurts containing no more than 23 grams of sugar per 6 ounces are widely available in the current market place and all yogurts available through USDA Foods contain significantly less than that. FNS provides a simple table in the training worksheet "Choose Yogurts That are Lower in Added Sugars" (<https://www.fns.usda.gov/tn/cacfp-meal-pattern-training-tools>) to help CNP operators identify and purchase yogurts that meet the requirement. The table includes common yogurt serving sizes and the maximum amount of sugar the yogurt may contain per serving. Schools may use the calculation or the chart to determine if a yogurt is within the sugar limit. If a yogurt meets the sugar limit using either the calculation or the chart, it is considered within the sugar limit and may be creditable.

#### *Meat/Meat Alternate at Breakfast*

Similar to the meal pattern requirements for older grade groups in the SBP, the updated preschool meal patterns includes a flexibility to serve meat/meat alternates in a

reimbursable breakfast. Starting October 1, 2017, schools may substitute the entire grains component with a meat/meat alternate at preschoolers' breakfasts a maximum of three times per week. This flexibility recognizes the value of a meat/meat alternate at breakfast and provides greater options for menu planners. Please note, this flexibility is slightly different than the one provided for older grade groups.

For more information and examples of this flexibility, please refer to CACFP 08-2017, *Questions and Answers on the Updated Meal Pattern Requirements for the Child and Adult Care Food Program*

(<https://www.fns.usda.gov/cacfp/questions-and-answers-updated-meal-pattern-requirements-child-and-adult-care-food-program>).

### **III. MEAL SERVICE OPTIONS**

#### **Offer Versus Serve and Family Style Meal Service**

Introducing children to a variety of healthy foods and new foods at a young age can help shape their eating habits and their attitudes and preference towards foods. Because of this, offer versus serve (OVS) is not considered appropriate for preschoolers. Starting October 1, 2017, schools can no longer use OVS when serving meals to preschoolers.

In place of OVS, FNS encourages schools to serve meals to preschoolers family style, when possible. Family style meal service allows children to serve themselves from common dishes of food with assistance from supervising adults as needed. Schools serving meals family style, across all grade groups, must follow the family style meal service guidance issued by the School Meal Programs.

Under the family style meal service in the School Meal Programs, preschoolers must take at least a 1/4 cup of vegetable or fruit. In addition, while family style meal service allows children to make choices in selecting foods, the supervising adult should initially offer the required minimum serving size of each food component/food item to each student. For more information on family style meal service in the School Meal Programs, please see "Offer Versus Serve Guidance for the National School Lunch Program and the School Breakfast Program, FY 15-16" available at: <https://www.fns.usda.gov/updated-offer-vs-serve-guidance-nslp-and-sbp-beginning-sy2015-16>.

### **IV. IMPLEMENTATION**

As described above, all schools serving meals to infants and preschoolers must comply with the updated meal pattern requirements no later than October 1, 2017. FNS recognizes that when schools are serving preschoolers at the same time as older children (i.e., grades are co-mingled), adhering to two different meal patterns may be operationally challenging. For example, it may be difficult to distinguish preschoolers from slightly older children, resulting in counting and claiming issues. Also, providing the correct foods and portion sizes on the serving line for two different meal patterns may be logistically difficult.

Regional Directors

State Directors

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Therefore, FNS is allowing schools that serve meals to preschoolers and K-5 students in the same service area at the same time to either follow the grade-appropriate meal patterns for each age group, or serve the K-5 meal pattern under 7 CFR 210.10 and 220.8 for both grade groups. School food authorities should work with their State agency to find solutions to enable them to serve students their grade-appropriate meal pattern prior to using this single menu flexibility. Please see memorandum SP 37-2017, *Flexibility for Co-Mingled Preschool Meals; Questions and Answers* (<https://fns-prod.azureedge.net/sites/default/files/cn/SP37-2017os.pdf>) for more information.

Although the updated preschool meal patterns are to be implemented by October 1, 2017, FNS understands that schools may need time to fully transition to these requirements. Therefore, FNS granted a transition period that covers schools for the entire SY 2017-2018, which focuses on providing technical assistance without risk of fiscal action or serious deficiencies, and can be used to identify strategies to successfully serve the grade-appropriate meals when preschoolers and K-5 students are co-mingled at meal service. FNS strongly encourages schools and State agencies to provide feedback on successful practices and challenges encountered during the transition period so FNS can evaluate the need for further clarification and guidance. For more information on the transition period, please see memorandum SP 30-2017, *Transition Period for the Updated Child and Adult Care Food Program Meal Patterns and the Updated National School Lunch and School Breakfast Programs' Infant and Preschool Meal Patterns* (<https://www.fns.usda.gov/transition-period-updated-cacfp-infant-preschool-meal-patterns>).

State agencies are reminded to distribute this information to Program operators. Program operators should direct any questions regarding this memorandum to the appropriate State agency. State agency contact information is available at <http://www.fns.usda.gov/cnd/Contacts/StateDirectory.htm>. State agencies should direct questions to the appropriate FNS Regional Office.



Angela Kline

Director

Policy and Program Development Division

Child Nutrition Programs

Attachment

**Preschool and Older Grade Group Meal Pattern Requirements:  
Comparison Chart**

<b>Meal Pattern Requirement</b>	<b>Preschool Meal Pattern (1 through 4 year olds)</b>	<b>Older Grade Group Meal Patterns</b>
Milk Fat Content	<ul style="list-style-type: none"> <li>• <b>1 year olds: whole milk</b></li> <li>• 2-4 year olds: low-fat or fat-free milk</li> </ul>	Must be low-fat or fat-free
Flavored Milk	<b>Not allowed</b>	<b>Allowed</b> ; must be fat-free (exemptions provided for school year 2017-2018)
Non-dairy beverages	Allowed; must be nutritionally equivalent to cow's milk per 210.10(d)(3)	Allowed; must be nutritionally equivalent to cow's milk per 210.10(d)(3)
Vegetables & Fruit Components	<ul style="list-style-type: none"> <li>• Vegetables and fruit are one component at breakfast</li> <li>• Vegetables and fruits are two separate components at lunch <b>and afterschool snack</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Only the fruit component is required at breakfast;</b> vegetables may be offered in place of fruits as long as 2 cups per week of under consumed vegetables (dark green, red/orange, beans and peas, or other vegetables) are included on the weekly breakfast menu</li> <li>• Vegetables and fruits are two separate components at lunch</li> <li>• <b>Vegetables and fruit are one component at afterschool snack</b></li> </ul>
Vegetables & Fruit Juice Limit	Yes; may count towards <b>the entire vegetable and fruit component no more than once per day</b>	Yes; may count towards <b>no more than half of the vegetables or fruits offered over the week</b>
Whole grain-rich requirement	Yes; must serve <b>at least one whole grain-rich grain per day</b>	Yes; <b>all grains offered must be whole grain-rich</b> (exemptions provided for school year 2017-2018)
Grain-based desserts	<b>Not allowed</b>	<b>Allow up to 2 ounce equivalents</b> of grain-based desserts per week at lunch
Breakfast cereal sugar limit	<b>Yes</b> ; must contain no more than 6 grams of sugar per dry ounce (no more than 21.2 grams of sugar per 100 grams of dry cereal)	<b>No sugar limit</b> ; sugar is limited by the weekly calorie limitation set by the dietary specifications

Attachment A

Tofu as a meat/meat alternate	Allowed	Allowed
Yogurt (including soy yogurt) sugar limit as a meat/meat alternate	<b>Yes;</b> must contain no more than 23 grams of sugar per 6 ounces	<b>No sugar limit;</b> sugar is limited by the weekly calorie limit set by the dietary specifications
Meat/meat alternates <u>at breakfast</u>	Allowed; <b>may substitute meat/meat alternate for the entire grain component no more than 3 times per week</b>	Allowed; <b>may substitute 1 ounce equivalent meat/meat alternate for 1 ounce equivalent grains after the minimum daily grains requirement is met</b>
Dietary Specifications	<b>Sugar limits</b> on breakfast cereal and yogurt (see above)	<ul style="list-style-type: none"> <li>• Meals must, on average, <b>meet weekly limits for calories, saturated fat, and sodium</b></li> <li>• Food products served in meals must <b>contain zero grams of trans fat</b></li> </ul>
Meal service option: Offer Versus Serve	<b>Not</b> allowed	Required for high schools in NSLP; optional for lower grades and in the SBP
Meal service option: Family Style Meal Service	Allowed	Allowed

## **QUESTIONS AND ANSWERS**

### **1. 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?**

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.

### **2. If a school offers half-day preschool, can juice be served at morning and afternoon meals?**

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.

Schools with half-day preschool may also choose to apply the all-day preschool meal pattern requirements across both half-day sessions. In this scenario, juice may only be served at a meal during the morning session or the afternoon session, and only one grain across all the meals served in the morning and afternoon sessions, collectively, must be whole grain-rich.

### **3. 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?**

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. The chart below outlines when a school may serve and when they may not serve juice if the school is serving preschool meals and

CACFP meals on the same day. Please note, this is not exhaustive list of all possible options.

<b>Juice Service Scenarios</b>	<b>SBP Preschool (220.8(o)(2))</b>	<b>NSLP Preschool Lunch (210.10(p)(2))</b>	<b>NSLP Preschool Afterschool Snack (210.10(o)(3)(ii))</b>	<b>CACFP (226.20(a)(2)(i),(3)(i))</b>	<b>Is it allowable?</b>
Scenario 1	Juice	No Juice	No Juice	Juice	Allowable
Scenario 2	No Juice	Juice	No Juice	Juice	Allowable
Scenario 3	No Juice	No Juice	Juice	Juice	Allowable
Scenario 4	Juice	Juice	No Juice	Juice	Not allowable
Scenario 5	No Juice	Juice	Juice	No Juice	Not Allowable
Scenario 6	Juice	No Juice	Juice	Juice	Not Allowable

In situations when a school serves preschool lunch and a CACFP snack or meal, FNS encourages the school to serve juice only once per day as a best practice. While juice can be part of a healthful diet, it lacks dietary fiber found in other forms of fruits. When consumed in excess, juice can contribute to extra calories. Additionally, the Dietary Guidelines for Americans recommend that at least half of fruits consumed come from whole fruits.

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

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. Please see memorandum SP 37-2017, *Flexibility for Co-Mingled Preschool Meals; Questions and Answers* (<https://www.fns.usda.gov/school-meals/flexibility-co-mingled-preschool-meals-questions-and-answers>) for more information.

**5. 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”?**

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. For more information about this flexibility, please see memorandum SP 37-2017, *Flexibility for Co-Mingled Preschool Meals; Questions and Answers* (<https://www.fns.usda.gov/school-meals/flexibility-co-mingled-preschool-meals-questions-and-answers>).

As a reminder, FNS has granted a transition period for schools implementing the updated infant and preschool meal patterns. The transition period covers schools for the entire SY 2017-2018, focuses on providing technical assistance without risk of fiscal action or serious deficiencies, and can be used to identify strategies to successfully serve the grade-appropriate meals when preschoolers and K-5 students are co-mingled at meal service. FNS encourages schools to provide feedback on successful practices and challenges encountered during the transition period so FNS can evaluate the need for further clarification and guidance.

**6. If a 5 year old student is in preschool, which meal patterns does the school follow for that student?**

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.

**7. Do preschools have the option to use ounce equivalents for grains prior to October 1, 2019?**

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. FNS understands that schools are already using ounce equivalents in the meal pattern requirements for older grade groups and that it would be cumbersome to maintain two different grain serving size requirements.

**8. Do schools serving infants or preschoolers follow the water requirement for the School Meal Programs or for the CACFP?**

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.

FNS encourages schools to offer water to preschoolers because very young children may not be able to request water because they lack the ability to communicate their desire for water. For additional guidance on offering water to preschoolers, please refer to CACFP 20-2016, *Water Availability in the Child and Adult Care Food Program* (<https://www.fns.usda.gov/cacfp/water-availability-child-and-adult-care-food-program>).

**9. Can reimbursable infant and preschool meals and snacks contain foods that are deep-fat fried on-site?**

Under the updated infant and preschool meal patterns, foods that are deep-fat fried on-site cannot contribute towards a reimbursable meal (7 CFR 210.10(o)(3)(i) and (4)(i), 210.10(p)(1), 210.10(q)(1), 220.8(o)(1), and 220.8(p)(1)). 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.

**10. 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?**

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 (7 CFR 226.20(i)). 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.

**11. 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?**

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* (<https://www.fns.usda.gov/policy-memorandum-modifications-accommodate-disabilities-school-meal-programs>). Program regulations at 7 CFR 210.10(m) and 220.8 (m) 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.

**12. How will the Administrative Review process work with the updated infant and preschool meal patterns?**

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.