



RULE OF THREE IN THE CACFP

**Michigan Department of Education
Child and Adult Care Food Program**

September 29, 2022



WELCOME TO THINKING THURSDAY!


Housekeeping:

- Participants are muted
- Enter any questions into the Q&A
- Certificate will be emailed to you
- Thank you for your cooperation!



WEBINAR TAKEAWAYS

- **What is Whole Grain Rich (WGR)**
- **How to use the Team Nutrition “Identifying Whole-Grain Rich Foods for the CACFP Using the Ingredient List” Worksheet**
- **How to identify creditable, non-creditable grains, and grain derivatives**
- **How to read an ingredients list for grain food items**
- **Other Resources**



WHO IS HERE TODAY?

- **Childcare center**
- **Family childcare home**
- **At-risk afterschool care center**
- **Adult day care center**
- **Sponsoring organization**
- **Emergency shelter**
- **School food authority**

KEY TERMS TO KNOW ABOUT WHOLE GRAINS

Whole grains are minimally processed and contain the bran, germ, & the endosperm

Refined grains are milled grains

Processed to remove the bran & germ

Loss of some key nutrients & fiber

Enriched grains are refined grains that undergo additional processing where nutrients are added back to the grain

Only foods made with 100% whole grains are considered a whole grain food.

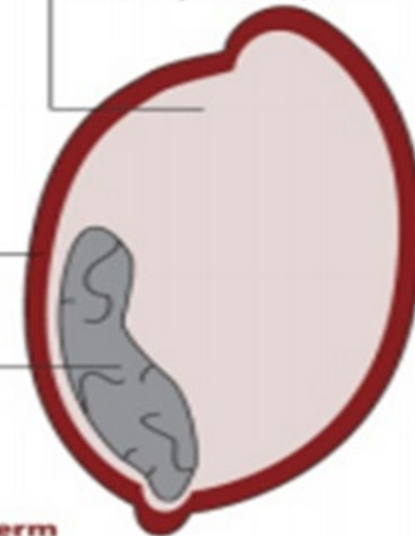
Whole grain kernel

Bran

"Outer shell" protects seed
Fiber, B vitamins, trace minerals

Endosperm

Provides energy
Carbohydrates, protein



Germ

Nourishment for the seed
Antioxidants, vitamin E, B vitamins



WHOLE GRAIN RICH (WGR) DEFINED AND WGR REQUIREMENT

- **At least half of the grains are whole grain and remaining grains are whole grain, enriched, bran, or germ**
- **One grain serving per day must be whole grain rich (WGR)**
- **Not required for infants, but a best practice, to serve WGR as developmentally appropriate**

IDENTIFYING WHOLE GRAIN RICH FOODS FOR THE CACFP

Tool to identify WGR Foods

Identifying Whole Grain-Rich Foods for the CACFP | Food and Nutrition Service (usda.gov)

Guidance: CACFP 01-2018 Grain Requirements in CACFP Q&A

USDA Food and Nutrition Service
U.S. DEPARTMENT OF AGRICULTURE

Identifying Whole Grain-Rich Foods for the Child and Adult Care Food Program Using the Ingredient List

The ingredient list is printed on the food packaging of products. This list includes information on fruits, grains, and other ingredients that are in the product. On the ingredient list, the ingredients are listed in order of quantity. If a whole grain is listed first, you know there is more of that whole grain than anything else in the food.

In the United States Department of Agriculture's Child and Adult Care Food Program (CACFP), you can identify grains that are whole grains only by looking at the first three grain ingredients that appear on the ingredient list. This method is known as the *Rule of Three*. If the ingredient list does not include three grain ingredients, you only have to look at the grain ingredients that are present. Some whole grain-rich foods may have only one grain ingredient.

In the CACFP at least one offering of grains per day must be whole grain-rich for children and adults.*

Step-by-Step Guide To Identifying Whole Grain-Rich Foods Using the Rule of Three



STEP 1 Find the ingredient list

This ingredient list is for bread. In this example, you would look at the full ingredient list to determine if the bread is whole grain-rich.


INGREDIENTS: Whole-wheat flour, water, yeast, brown sugar, wheat gluten, contains 2% or less of each of the following: salt, dough conditioners, soybean oil, vinegar, cultured wheat flour, citric acid.

The ingredient list shown here is for a frozen cheese pizza. Because pizza is a combination food, the ingredients for all the foods within the cheese pizza, such as the crust, cheese, and sauce, are listed on this one ingredient list. In this example, you would look at the ingredients for the crust to determine if the grain component of this food is whole grain-rich.

INGREDIENTS: Crust: Whole-wheat flour, enriched wheat flour (bleached wheat flour, malted barley flour, niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid), wheat bran, water, soybean oil, distillers, baking powder, yeast, salt, dough conditioners, wheat gluten, contains less than 2% of each of the following: vegetable shortening, sesame flour preservatives. **Shredded mozzarella cheese:** Pasturized part-skim milk, cheese cultures, salt, enzymes. **Sauce:** Water, tomato paste, pizza seasoning, modified food starch.

*During the COVID-19 public health emergency, some State agencies may have updated their fiscal year 2020-2022 meal patterns to meet additional requirements on these services (1) available at: <https://www.usda.gov/child-care/cacfp/qanda> (2) 2022-23 updates and final rules.

FNS-655 Slightly Revised October 2021





DISREGARDED INGREDIENTS

TN Handout
Page 6

Disregarded Ingredients:

- Cellulose fiber
- Corn dextrin
- Corn starch
- Modified food starch
- Rice starch
- Tapioca starch
- Water
- Wheat dextrin
- Wheat gluten
- Wheat starch
- Any ingredients that appear after the phrase, “Contains 2% or less of...” or “Contains less than 2% of...”

WHOLE GRAIN LIST PAGE 5

Whole-Grain Ingredients

- Amaranth
- Amaranth flour
- Brown rice
- Brown rice flour
- Buckwheat
- Buckwheat flour
- Buckwheat groats
- Bulgur
- Corn masa
- Corn treated with lime
- Cracked wheat
- Crushed wheat
- Dehulled barley
- Dehulled-barley flour
- Entire wheat flour
- Flaked rye
- Flaked wheat
- Graham flour
- Hominy
- Hominy grits
- Instant oatmeal
- Masa harina
- Millet
- Millet flour
- Nixtamalized corn flour/meal
- Oat groats
- Oats/oatmeal
- Old fashioned oats
- Popcorn
- Quick cooking oats
- Quinoa
- Rye berries
- Rye groats
- Sorghum
- Sorghum flour
- Spelt berries
- Sprouted brown rice
- Sprouted buckwheat
- Sprouted einkorn
- Sprouted spelt
- Sprouted wheat
- Sprouted whole rye
- Sprouted whole wheat
- Steel cut oats
- Teff
- Teff flour
- Triticale
- Triticale flour
- Wheat berries
- Wheat groats
- White whole wheat flour
- Whole corn
- Whole durum flour
- Whole grain corn
- Whole grain corn flour
- Whole grain oat flour
- Whole grain spelt flour
- Whole grain wheat
- Whole grain wheat flakes
- Whole grain wheat flour
- Whole rye flour
- Whole wheat flour
- Wild rice
- Wild rice flour

In addition to the ingredients in this chart, if an ingredient has “whole” in front of it, then it is a whole-grain ingredient.





Enriched Grain Ingredients

- Enriched bromated flour
- Enriched corn flour
- Enriched durum flour
- Enriched durum wheat flour
- Enriched farina
- Enriched grits
- Enriched rice
- Enriched rice flour
- Enriched rye flour
- Enriched wheat flour
- Enriched white flour
- Other grains with the word “enriched” in front of it.



In addition to the ingredients listed above, if the ingredient list states or includes the nutrients used to enrich the flour, then your product has enriched grains. For example, an ingredient list might read: “Durum flour (niacin, iron, riboflavin, folic acid, thiamin).” The nutrients listed in the parenthesis indicate that the durum flour is enriched.

ENRICHED GRAINS
HANDOUT PAGE 6



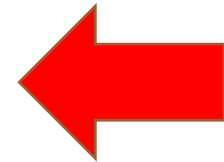
Bran or Germ Ingredients

- Corn bran
- Rice bran
- Wheat bran
- Oat bran
- Rye bran
- Wheat germ

**BRAN & GERM
HANDOUT PAGE 6**

Non-Creditable Grains or Flours

These foods cannot be one of the first three ingredients for whole grain-rich items.



- Barley malt
- Bean or legume flour (such as soy, chickpea, lentil, etc.)
- Bromated flour
- Corn
- Corn fiber
- Degermed corn
- Degerminated corn meal
- Durum flour
- Farina
- Grits
- Malted barley flour
- Nut or seed flour (any kind)
- Oat fiber
- Potato flour
- Rice flour
- Semolina
- Stone ground corn
- Tapioca flour
- Vegetable flour (any kind)
- Wheat flour
- White flour
- Yellow corn flour
- Yellow corn meal

TEST YOUR KNOWLEDGE

- **Non-creditable grains or flours are grains that are not enriched or are made from vegetables**
 - True or False
- **If a non-creditable grain is listed in the first three grain ingredients, the item is not a WGR item**
 - True or False



TEST YOUR KNOWLEDGE ANSWER

Non creditable grains or flours are grains that are not enriched or are made from vegetables

True

If a non creditable grain is listed in the first three grain ingredients, the item is not a WGR item

True





Step-by-Step Guide To Identifying Whole Grain-Rich Foods Using the *Rule of Three*



RULE OF THREE

STEP 1: FIND THE INGREDIENTS LIST

INGREDIENTS: Whole-wheat flour, water, yeast, brown sugar, wheat gluten, contains 2% or less of each of the following: salt, dough conditioners, soybean oil, vinegar, cultured wheat flour, citric acid.

INGREDIENTS: Crust: Whole-wheat flour, enriched wheat flour (bleached wheat flour, malted barley flour, niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid), wheat bran, water, soybean oil, dextrose, baking powder, yeast, salt, dough conditioners, wheat gluten, contains less than 2% of each of the following: vegetable shortening, sesame flour, preservatives.

Shredded mozzarella cheese: Pasteurized part skim milk, cheese cultures, salt, enzymes. **Sauce:** Water, tomato paste, pizza seasoning, modified food starch.



Disregarded Ingredients:

- Cellulose fiber
- Corn dextrin
- Corn starch
- Modified food starch
- Rice starch
- Tapioca starch
- Water
- Wheat dextrin
- Wheat gluten
- Wheat starch
- Any ingredients that appear after the phrase, “Contains 2% or less of...” or “Contains less than 2% of...”

INGREDIENTS: Crust: Whole-wheat flour, enriched wheat flour (bleached wheat flour, malted barley flour, niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid), wheat bran, water, soybean oil, dextrose, baking powder, yeast, salt, dough conditioners, ~~wheat gluten, contains less than 2% of each of the following: vegetable shortening, sesame flour, preservatives.~~

▲ *This ingredient list shows some ingredients that can be crossed out to simplify the list.*

STEP 2: SIMPLIFY THE INGREDIENT LIST!

**STEP 3:
LOOK AT
THE FIRST
GRAIN
INGREDIENT**

INGREDIENTS: Crust: **Whole-wheat flour,** enriched wheat flour (bleached wheat flour, malted barley flour, niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid), wheat bran, ~~water,~~ soybean oil, dextrose, baking powder, yeast, salt, dough conditioners, ~~wheat gluten, contains less than 2% of each of the following: vegetable shortening, sesame flour, preservatives.~~

- ▲ *The first grain ingredient is “whole-wheat flour,” which is a whole-grain ingredient.*

STEP 4: LOOK AT THE SECOND GRAIN INGREDIENT

Does product have a second grain?

- **No – WGR item!**
- **Yes - then ask:**

Is the second grain:

- **A whole grain?**
- **An enriched grain?**
- **Bran or germ?**
- **If Yes, we go to Step 6**
- **If NO, it is not WGR under Rule of 3**

INGREDIENTS: Crust: Whole-wheat flour, enriched wheat flour (bleached wheat flour, malted barley flour, niacin, reduced iron, thiamine mononitrate, riboflavin, ascorbic acid), wheat bran, water, soybean oil, dextrose, baking powder, yeast, salt, dough conditioners, ~~whole wheat flour, contains less than 2% of each of the following: vegetable shortening, sesame flour, preservatives.~~



INGREDIENTS: Crust: **Whole-wheat flour, enriched wheat flour** (bleached wheat flour, malted barley flour, niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid), **wheat bran**, water, soybean oil, dextrose, baking powder, yeast, salt, dough conditioners, ~~wheat gluten, contains less than 2% of each of the following: vegetable shortening, sesame flour, preservatives.~~

STEP 5: LOOK FOR THIRD GRAIN INGREDIENT

- **If the third ingredient a whole grain, enriched or bran or germ?**
- **If yes, then the food is WGR!**

This crust is WGR!

**STEPS 1 - 3:
IS THE FIRST
INGREDIENT A
WHOLE GRAIN
INGREDIENT?**

NO

First ingredient is NOT a WG

- This food is **NOT** creditable as a **WGR** food item using the **Rule of Three**

OTHER OPTIONS:

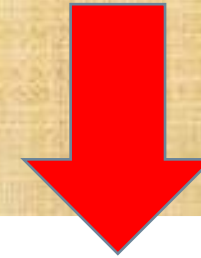
- **CN Label?**
- **Product Formulation Statement (PFS)?**

Credit as an enriched product instead

Find a similar product with a WGR listed as first ingredient

FLOUR BLENDS

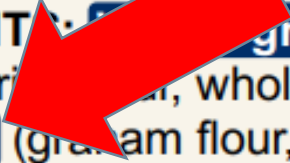
- Treat flour blends as one ingredient when applying the Rule of Three
- If the first grain ingredient is a flour blend, all the ingredients in the flour blend must be whole-grain for the item to be WGR
- Look at each grain within the blend to determine if blend is WG as a whole ingredient.
- This flour blend is WGR!



INGREDIENTS: **Whole grain flour** (whole-wheat flour, brown rice flour, whole grain oat flour), water, **flour blend** (graham flour, enriched wheat flour, enriched corn flour, wheat bran), yeast, salt.

FLOUR BLENDS, CONT.

- Look at sub ingredients within the second flour blend
- Remember: Second flour blend is the second grain ingredient
- This blend must be made up of **WG**, enriched/fortified bran and/or germ
- This flour blend is not completely **WG**, but is made up of **WG** and enriched flours
- This product is **WGR!**



INGREDIENTS: **grain flour** (whole-wheat flour, brown rice flour, whole grain oat flour), water, **flour blend** (gram flour, enriched wheat flour, enriched corn flour, wheat bran), yeast, salt.

NON-CREDITABLE FLOUR BLEND EXAMPLE

INGREDIENTS: Flour blend (durum flour, bromated flour, brown rice flour), water, salt.

- If the flour blend includes any non-creditable flours or grains, the flour blend is not a creditable grain ingredient
- This flour blend includes two non-creditable flours (durum flour and bromated flour), so the flour blend is not a creditable grain ingredient

STEP 1: IDENTIFYING WGR BREAKFAST CEREALS

INGREDIENTS: **Whole grain oat flour¹**, corn flour, sugar, salt, tripotassium phosphate, vitamin E. **Vitamins and Minerals²:** calcium carbonate, iron and zinc, vitamin C, vitamin B6, vitamin A, vitamin B12.

- **For Ready to Eat (RTE) cereals**
 - First ingredient is a WG
 - Go to step 2
- **If first ingredient is not WGR**
 - **Not WGR under Rule of 3**

STEP 2: IDENTIFYING WGR BREAKFAST CEREALS - IS IT FORTIFIED?

INGREDIENTS: **Whole grain oat flour¹**, corn flour, sugar, salt, tripotassium phosphate, vitamin E. **Vitamins and Minerals²:** calcium carbonate, iron and zinc, vitamin C, vitamin B6, vitamin A, vitamin B12.

- **Look for fortification!**
- Vitamins and minerals listed?
 - **If yes, WGR!**
 - You can stop evaluation if within sugar limit
- **If not fortified, but has a WG as the first ingredient**
 - See next example

**STEP 2:
READY TO EAT
(RTE)
CEREAL
NON-
FORTIFICATION
EXAMPLE**

INGREDIENTS: Whole grain wheat¹, wheat bran³, raisins, oat fiber⁴, sea salt.

- **First Ingredient a WG? Yes!**
 - If yes, is it fortified? **NO**
- **If No – Use the Rule of Three!**
 - **Look at the second grain ingredient:**
 - **Wheat Bran**
 - **WG? Yes**
 - **Third ingredient: oat fiber (non creditable)**
 - **NOT WGR food option**
 - **Not creditable as a WGR item***



TRY IT OUT! CRACKER

- **Is this cracker creditable as WGR?**
 - **First ingredient WG?**
 - **Yes**
 - **Second Ingredient WG, Enriched grain, bran or germ?**
 - **Yes, enriched rye flour**
 - **Third Ingredient WG, Enriched grain, bran or germ?**
 - **Yes, cracked wheat is a WG**
 - **Cracker is WGR!**

INGREDIENTS: Whole grain wheat flour, vegetable oil, enriched rye flour, cracked wheat.



**TRY IT OUT!
BREAD**

- **Is this bread creditable as WGR?**
- **First ingredient WG?**
 - **No – enriched flour blend**
- **Bread is not WGR**

INGREDIENTS: Flour blend (enriched flour, brown rice flour, whole grain oat flour), water, whole grain flour blend (graham flour, whole grain corn flour), wheat bran, yeast, salt.

TRY IT OUT! RTE CEREAL

- Is this RTE Cereal creditable as a **WGR**?
 - First ingredient **WG**?
 - Yes – **WG Corn**
 - Is it Fortified?
 - Yes – **Vitamins and minerals are listed**
- Cereal is **WGR!**

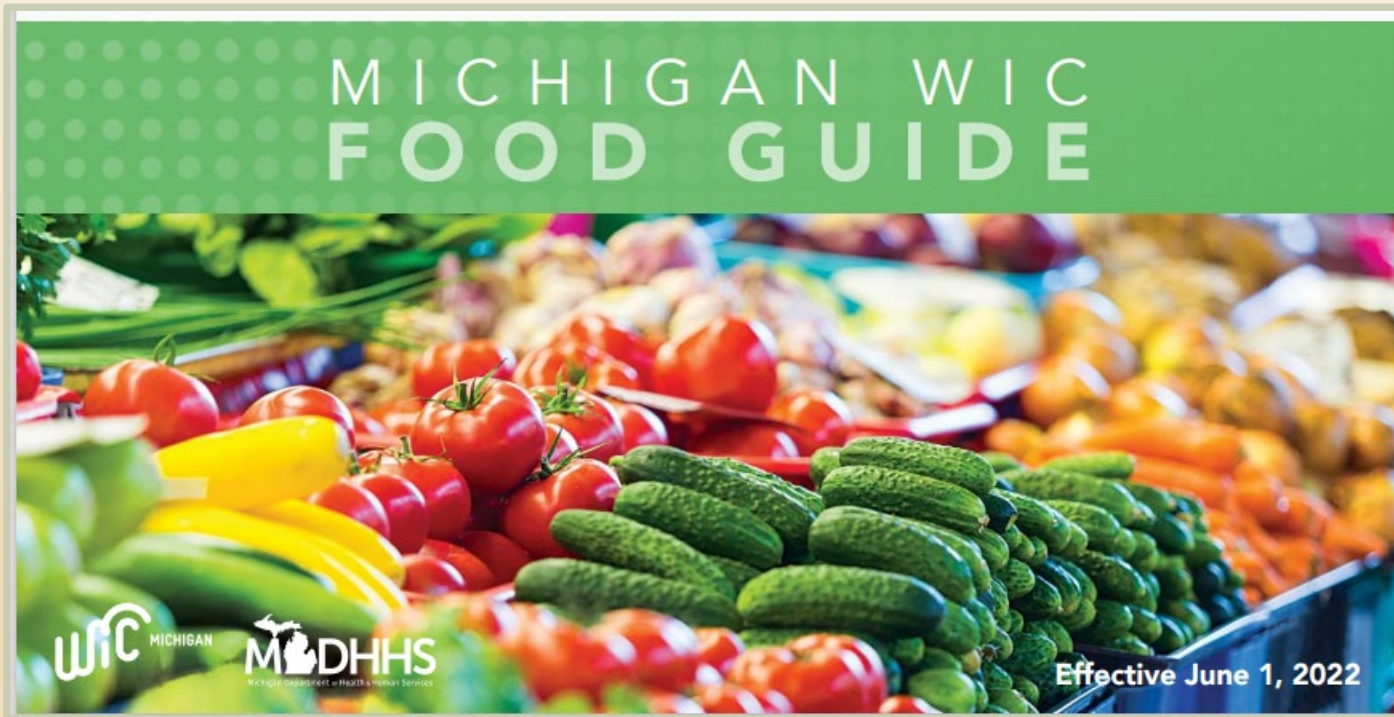
INGREDIENTS: Whole grain corn, corn meal, sugar, corn bran, salt, brown sugar syrup. Vitamins and Minerals: calcium carbonate, iron, zinc, vitamin C, vitamin B6, vitamin B2, vitamin A, vitamin B12.

WGR RESOURCES

[Nutrition Standards for CACFP Meals and Snacks | Food and Nutrition Service \(usda.gov\)](#)

- [CACFP Meal Pattern Training Worksheets | Food and Nutrition Service \(usda.gov\)](#)
- [Crediting Handbook for CACFP | Food and Nutrition Service \(usda.gov\)](#)
- [Meal Patterns - National CACFP Sponsors Association](#)
- [Brighton Training: All Aboard the Whole Grain Express Michigan Department of Education | Bright Track – Michigan Department of Education | Bright Track \(misponsortraining.com\)](#)

MICHIGAN WIC FOOD GUIDE



- **WIC-Food-Guide-English.pdf (michigan.gov)**
- **WG Breads, tortillas, buns, pasta**
- ***Not all cereals shown are WGR – look for the wheat symbol**



NEXT THINKING THURSDAYS

- **October 27, 2022**
- **2 pm!**
- **Topic: Back to Normal Operations**



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Child and Adult Care Food Program**

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**NEW CACFP Email: MDE-CACFP@michigan.gov
Training Certificate provided via email**

Presenter: Melissa Lonsberry, MS RDN

Best contact method: Lonsberrym@michigan.gov

This institution is an equal opportunity provider.

For the full Non-Discrimination statement, see the CACFP website at

www.michigan.gov/CACFP



**Food is kindness –
pass it forward.**