United States Department of Agriculture

Food and Nutrition Service

Park Office Center

3101 Park Center Drive
Alexandria
VA 22302

DATE: June 30, 2017

MEMO CODE: CACFP 16-2017

SUBJECT: Grain-Based Desserts in the Child and Adult Care Food Program

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

This memorandum provides flexibility in the service of grain-based desserts in the Child and Adult Care Food Program (CACFP). Memorandum CACFP 02-2017, *Grain Requirements in the Child and Adult Care Food Program; Questions and Answers,* October 14, 2016, will be revised to reflect this flexibility.

Grain-Based Desserts

The U.S. Department of Agriculture (USDA) was required to update the CACFP meal patterns to align them with the Dietary Guidelines for Americans (Dietary Guidelines). The Dietary Guidelines recommend limiting the consumption of added sugars and solid fats as part of a healthy eating pattern, and identify grain-based desserts as sources of added sugars and saturated fats. As a result, under the updated CACFP meal patterns, grain-based desserts cannot count towards the grain requirement at any meal or snack (7 CFR 226.20(a)(4)(iii)), starting October 1, 2017. This requirement was designed to help reduce the amount of added sugar and saturated fats that children and adults consume, which, as a percent of calories, is particularly high in children.

In the proposed rulemaking (https://www.fns.usda.gov/fr-011515), USDA's Food and Nutrition Service (FNS) requested that commenters provide suggestions for the best way to define grain-based desserts. When stakeholders commented on grain-based desserts in the meal pattern proposed rule, the majority supported no longer allowing grain-based desserts to be part of a reimbursable meal. Commenters also offered a definition for grain-based desserts. Commenters observed that establishing limits on sugar, saturated fat, and other nutrients would require centers and day care homes to evaluate each grain item they serve against the nutrient standards. This would have greatly increased complexity and burden on CACFP operators. FNS agreed and concluded that using categories to define grain-based desserts, instead of establishing nutrient standards, is the best approach for the CACFP. Therefore, FNS adopted the definition requested by numerous commenters to use the foods denoted with a superscript 3 or 4 in Exhibit A of USDA's "*Food Buying Guide for Child Nutrition Programs.*"

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The Exhibit A that was in effect for the CACFP at the time the proposed rule was published, and which commenters recommended for defining grain-based desserts, did not identify sweet crackers (e.g., graham and animal crackers) as grain-based desserts. However, since the publication of the final rule (https://www.fns.usda.gov/fr-110116), FNS revised Exhibit A via memorandum CACFP 02-2017, "*Grain Requirements in the Child and Adult Care Food Program; Questions and Answers*" (https://www.fns.usda.gov/cacfp/grain-requirements-cacfp-qas) to include sweet crackers as a grain-based dessert. This revision was made to be consistent with the National School Lunch Program and School Breakfast Program (School Meal Programs) which identifies sweet crackers as grain-based desserts. FNS has gathered extensive feedback from stakeholders on the inclusion of sweet crackers as grain-based desserts in order to understand the primary issues with implementation and develop technical assistance resources. Stakeholder feedback shows no longer allowing sweet crackers as part of a reimbursable meal would be particularly challenging compared to other grain-based desserts. Stakeholders reported that sweet crackers are appetizing, low-cost, and shelf-stable, and are frequently served in at-risk afterschool programs and rural areas because of these attributes.

In light of the above, and because stakeholders did not have an opportunity to comment on the revised Exhibit A, FNS understands some flexibility is needed. Therefore, Exhibit A has been further revised to exclude sweet crackers from being designated as a grain-based dessert in the CACFP (see Attachment 1). This revision does not change the designation of sweet crackers for the School Meal Programs' K-12 meal pattern requirements. 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 is not contributing to the reimbursable meal. In addition, FNS will continue to monitor any challenges associated with grain-based desserts to determine if more guidance is needed.

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.

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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.

Original Signed

Angela Kline
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Policy and Program Development Division
Child Nutrition Programs

Attachment

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Attachment

EXHIBIT A: GRAIN REQUIREMENT FOR CHILD NUTRITION PROGRAMS[1, 2]

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

Group A	Ounce Equivalent (Oz Eq) for Group A	Minimum Serving Size for Group A
• Bread type coating • Bread sticks (hard) • Chow Mein noodles • Savory Crackers (saltines and snack crackers) • Croutons • Pretzels (hard) • Stuffing (dry) Note: weights apply to bread in stuffing.	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
Group B	**Oz Eq for Group B**	**Minimum Serving Size for Group B**
• Bagels • Batter type coating • Biscuits • Breads - all (for example sliced, French, Italian) • Buns (hamburger and hot dog) • Sweet Crackers[5] (graham crackers - all shapes, animal crackers) • Egg roll skins • English muffins • Pita bread • Pizza crust • Pretzels (soft) • Rolls • Tortillas • Tortilla chips • Taco shells	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

[1] 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.

[2] 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.

[5] 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.

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Group C	Oz Eq for Group C	Minimum Serving Size for Group C
• Cookies[3] (plain - includes vanilla wafers) • Cornbread • Corn muffins • Croissants • Pancakes • Pie crust (dessert pies[3], cobbler[3], fruit turnovers[4], and meat/meat alternate pies) • Waffles	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	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
Group D	**Oz Eq for Group D**	**Minimum Serving Size for Group D**
• Doughnuts[4] (cake and yeast raised, unfrosted) • Cereal bars, breakfast bars, granola bars[4] (plain) • Muffins (all, except corn) • Sweet roll[4] (unfrosted) • Toaster pastry[4] (unfrosted)	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	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
Group E	**Oz Eq for Group E**	**Minimum Serving Size for Group E**
• Cereal bars, breakfast bars, granola bars[4] (with nuts, dried fruit, and/or chocolate pieces) • Cookies[3] (with nuts, raisins, chocolate pieces and/or fruit purees) • Doughnuts[4] (cake and yeast raised, frosted or glazed) • French toast • Sweet rolls[4] (frosted) • Toaster pastry[4] (frosted)	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
Group F	**Oz Eq for Group F**	**Minimum Serving Size for Group F**
• Cake[3] (plain, unfrosted) • Coffee cake[4]	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

[3] 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.

[4] 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.

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Group G	Oz Eq for Group G	Minimum Serving Size for Group G
• Brownies[3] (plain) • Cake[3] (all varieties, frosted)	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
Group H	**Oz Eq for Group H**	**Minimum Serving Size for Group H**
• Cereal Grains (barley, quinoa, etc.) • Breakfast cereals (cooked)[6,7] • Bulgur or cracked wheat • Macaroni (all shapes) • Noodles (all varieties) • Pasta (all shapes) • Ravioli (noodle only) • Rice	1 oz eq = 1/2 cup cooked or 1 ounce (28 gm) dry	1 serving = 1/2 cup cooked or 25 gm dry
Group I	**Oz Eq for Group I**	**Minimum Serving Size for Group I**
• Ready to eat breakfast cereal (cold, dry)[6,7]	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	1 serving = 3/4 cup or 1 oz, whichever is less

[3] 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.

[6] 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.

[7] 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.

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