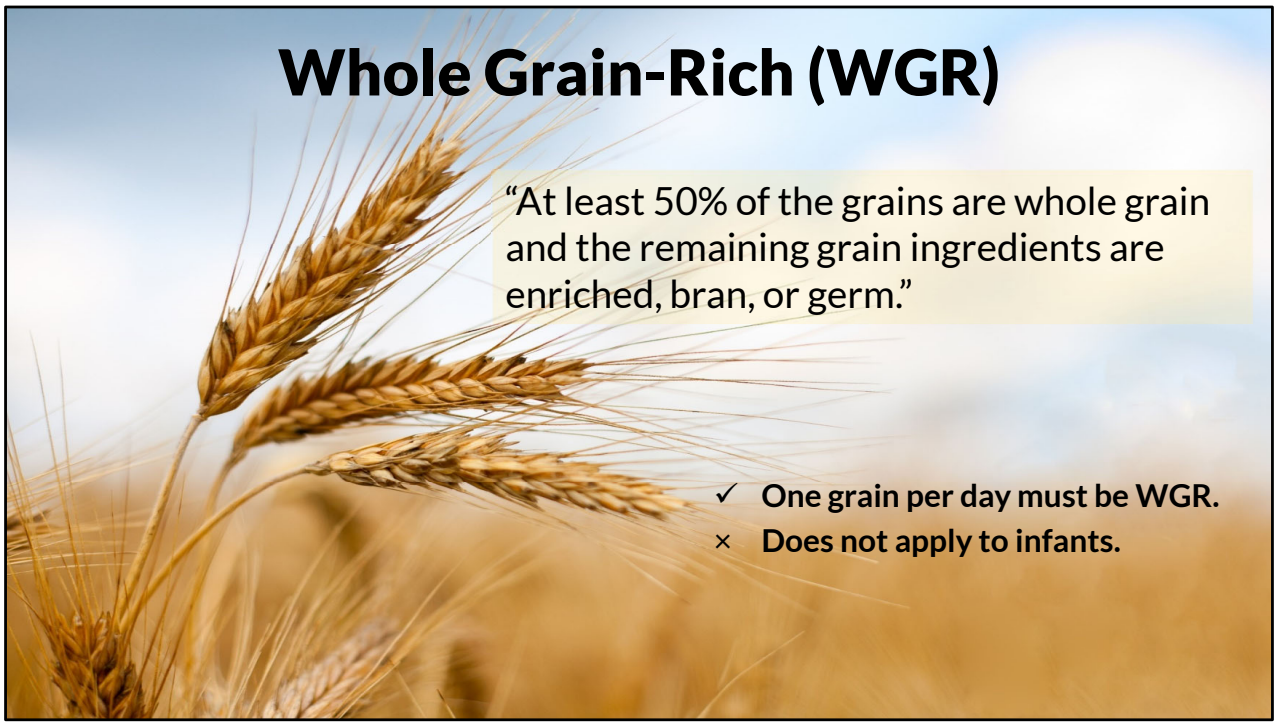
CACFP TRAINING
Child and Adult Care Food Program

Identifying Whole Grain-Rich

WISCONSIN DEPARTMENT OF
Public Instruction
Jill K. Underly, PhD, State Superintendent



First, let's start with a definition from USDA. "Whole grain-rich" is a term used by USDA, and it means grain items that are at least 50% whole grains, and any remaining grains are enriched, bran, or germ, are considered whole grain-rich.

As you know, one grain item served each day must be WGR in the CACFP. However, this requirement does not apply to infants, who are defined as ages 0 through 11 months.

Menu Documentation

Monday	Tuesday	Wednesday	Thursday	Friday
Banana **WG Cheerios** Milk	Avocado Baked scrambled eggs Milk	Mixed fruit Biscuit Ham slice Milk	Strawberries **Oatmeal** Milk	Fresh apple slices Yogurt Milk
HM cheese pizza Cucumbers Apple slices Milk	Turkey breast sandwich on **WG bread** Steamed broccoli Watermelon Milk	Oven baked chicken **Brown rice** Cauliflower Zucchini Milk	Meatloaf Roasted beets Kiwi Corn bread Milk	Baked fish **Quinoa** Tomatoes Pineapple Milk

It is required to document WGR items on menus. You may write WG or WGR to notate WGR items. Items that are natural whole grains, such as brown rice, quinoa and oatmeal, do not require the WG or WGR. However, it is recommended to bold all WGR items, including those that are natural whole grains, so it is easy to see that you have at least one WGR item on the menu every day. If a cereal is WGR, you must document this on the menu next to the cereal's name because not all cereals are WGR.

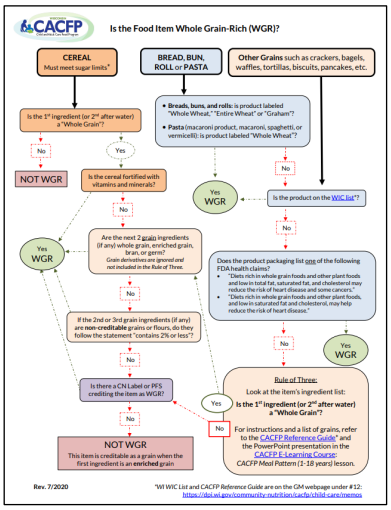
And as a reminder, on days that do not list a WGR item, the lowest reimbursable meal that served a grain must be disallowed.

In addition to serving one WGR item each day, you must keep documentation on file to show that WGR items served meet WGR criteria. The type of documentation required depends on the item and the method used to determine the item as WGR.

We recommend filing documentation in a folder, binder or section designated for grains or the specific type of grain item being served. For example, have a binder for all WGR items, and organize bread labels in one section and cereals in another.

Determining WGR Items

WGR Flowchart → Use this to determine if an item meets WGR criteria.



There are a few different ways to determine if a grain is WGR, however, all ways cannot be used for every grain. There is a process to follow with each type of item, which is illustrated in the *Is the Food Item WGR Flowchart*. This flowchart will not be used during this presentation, but it does serve as a guideline to reference in the future.

Method 1: FDA Standard of Identity

Breads, Buns and Rolls labeled as:

- Whole Wheat
- Entire Wheat
- Graham

on the front of the package are whole grain-rich.

The first method to identify a WGR item is when specific products have the FDA Standard of Identity.

Bread, buns and rolls labeled with the exact phrases shown on this slide – "Whole Wheat," "Entire Wheat," or "Graham" – meet the FDA Standard of Identity for whole wheat bread products and are considered WGR. You will often see "100% Whole Wheat" on a product's package as shown in the examples on the slide, which includes the "whole wheat" statement, so these products are WGR.

FDA Standard of Identity: Pasta

Pasta labeled as:

- Whole Wheat Macaroni Product
- Whole Wheat Macaroni
- Whole Wheat Spaghetti
- Whole Wheat Vermicelli

on the front of the package are whole grain-rich.

Similarly, pasta labeled with the exact phrases shown on the slide – "Wheat macaroni product," "Whole wheat macaroni," "Whole wheat spaghetti," and "Whole wheat vermicelli" – meet the FDA Standard of Identity for pasta and are considered WGR.

There are two different pasta products on this slide that meet this FDA Standard of Identity for pasta. The product on the left is Great Value Whole Wheat Elbows. Underneath the name, it has the "whole wheat macaroni product" statement.

The product on the right is 100% Whole Wheat Penne Rigate. Again, under the product name, it has the "macaroni product" statement so, therefore, this is a whole wheat macaroni product.

Other Statements on Product Packages

A product labeled as:

- Whole Grain
- Contains Whole Grains
- Made with Whole Grains
- Made with Whole Wheat
- Wheat

is **not** WGR based on the package.

Must use another method!

However, be aware that manufacturers often label their products with terms that are similar to the terms on the previous two slides. Some frequently used terms include those shown here: Whole Grain, Contains Whole Grains, Made with Whole Grains, Made with Whole Wheat and Wheat.

When **any** grain item includes one of these statements on the front of the package, the item is not necessarily WGR. Another method must be used to determine if that item meets WGR criteria.

On the slide are some examples of these statements on products:
-Arnold Oat Nut Bread is labeled with 'Whole Grains,'
-Food Club Bread is just labeled 'Wheat,' and
-100% Whole Grain Wheat Thins.

Other Products Labeled "Whole Wheat"

Other products labeled "whole wheat" such as:

- Crackers
- Bagels
- Waffles
- Muffins
- Pancakes
- English Muffins

DO NOT HAVE AN FDA STANDARD OF IDENTITY.

Must use another method!

Additionally, other grain products, such as crackers, tortillas, bagels, waffles, muffins and biscuits, that contain one of the FDA Standard of Identity statements are not automatically WGR. These products do not have an FDA Standard of Identity (like bread, buns, rolls and pasta does) and must be evaluated for WGR creditability using another method.

Product Documentation

Product documentation supports menus and claims, and may include:

- Product package with ingredient list, or
- Child Nutrition (CN) Label or Product Formulation Statement (PFS)

Use the CACFP Training Spotlight: Documentation of WGR Foods for specific requirements.

CACFP TRAINING Spotlight

DPI COMMUNITY NUTRITION TEAM

IN THIS HANDOUT:

DOCUMENTATION FOR WHOLE GRAIN RICH (WGR) FOODS

One serving of grains per day must be whole grain rich (WGR). This handout provides information on documentation to keep on file to show that a grain item meets CACFP WGR criteria. The type of documentation required depends on the item and/or method used to determine the item as WGR.

This handout is applicable to all programs except for School Food Authorities operating the At-Risk Afterschool Program using the NSLP meal pattern.

When the item is:

- Bread, Buns, and Rolls labeled "Whole Wheat," "Entire Wheat," or "Graham"
- Pasta labeled "Whole Wheat" (macaroni product, macaroni, spaghetti, or vermicelli)

Keep the Following On File

Product label or picture/copy of label (front of the package) that includes the name and brand of product and shows:

- Bread, buns or rolls are labeled "Whole Wheat," "Entire Wheat," or "Graham"
- Pasta is labeled "Whole Wheat"

Bread, buns, rolls, and pasta labeled "Whole Grain," "Contains whole grains," "Made with whole grains," "Made with whole wheat," or "Wheat" are not WGR based on the front of the package. These items must be verified as WGR with other documentation.

When the item is on a WIC Approved Whole Grains list

See Wisconsin WIC Approved Whole Grains

Keep the Following On File

Product label or picture/copy of label (front of the package) that includes the name and brand of product

As mentioned, you must keep documentation on file for all items listed as WGR on your menus. The *CACFP Training Spotlight: Documentation of WGR Foods* identifies the type of documentation required, depending on the determination method used. As each method to determine WGR items is discussed, the documentation that must be kept on file for each method will be identified.

Product Labels: FDA Standard of Identity Method

When the item is:

- **Bread, Buns, and Rolls labeled "Whole Wheat," "Entire Wheat," or "Graham"**
- **Pasta labeled "Whole Wheat"** (macaroni product, macaroni, spaghetti, or vermicelli)

Keep the Following On File

Product label or picture/copy of label (front of the package) that includes the name and brand of product and shows:

- Bread, buns or rolls are labeled "Whole Wheat," "Entire Wheat," or "Graham"
- Pasta is labeled "Whole Wheat"

Bread, buns, rolls, and pasta labeled "Whole Grain," "Contains whole grains," "Made with whole grains," "Made with whole wheat," or "Wheat" are **not WGR** based on the front of the package. These items must be verified as WGR with other documentation.

When you have determined bread, buns, rolls and/or pasta as WGR using the FDA Standard of Identify method, you must keep the product label or a picture of the label on file, and it must include the name and brand of the product, along with the FDA Standard of Identify statement.

Method 2: WIC-Approved Whole Grains

A product listed on Wisconsin's WIC-Approved Whole Grains List is whole grain-rich.

Includes specific brands of bread, buns, rolls and pasta, as well as:

- Tortillas (Wheat and Corn)
- Oats/Oatmeal
- Brown Rice

Wisconsin WIC Approved Whole Grains

Foods listed below meet CACFP whole grain rich (WGR) criteria.

BREADS, BUNS, ROLLS

Any brand labeled "100% Whole Wheat" and lists whole wheat flour as the first ingredient.

Allowed brands:

- Aunt Millie's bread
- Beigel's Windmill Farms bread
- Best Choice bread
- Bimbo bread
- Brownberry bread and buns
- Butternut bread
- Country Hearth bread
- Food Club bread
- Great Value bread and buns
- Hy-Vee bread
- IGA whole wheat bread
- Kroger bread and buns
- Lewis Bake Shop bread
- Our Family bread
- Pepperidge Farm bread and buns
- Private Selection bread
- S. Rosen bread
- Sara Lee bread
- Schnuck's bread
- SunnyBrook bread
- Village Hearth bread and buns

TORTILLAS / WRAPS

WHOLE WHEAT

Only the following brands labeled "Whole Wheat" or "100% Whole Wheat":

- Best Choice
- Bucky Badger
- Chi-Chi's
- Don Pancho
- Essential Everyday
- Food Club
- Frescados
- Great Value
- Hy-Vee
- IGA
- Kroger
- La Bandertia
- Market Pantry
- Mission
- Ortego
- Our Family
- Tio Santi

OATS/OATMEAL

- Plain, any brand
- Quick
- Old fashioned
- Gluten free

BROWN RICE

- Any brand, dry
- Plain brown rice without added herbs, seasonings, or beans
- Regular, instant, and boil-in-bag type

WHOLE WHEAT PASTA

Any shape pasta

Only the following brands labeled "Whole Wheat" or "100% Whole Wheat":

- Barilla (Whole Grain)
- Essential Everyday
- Food Club
- Gia Russa
- Good and Gather
- Great Value
- Heartland
- Hy-Vee
- Kroger
- Our Family
- Racconto
- Ronzoni 100% Whole Grain

TORTILLAS / WRAPS

WHITE OR YELLOW SOFT CORN

Only the following brands labeled "White Corn" or "Yellow Corn":

- Best Choice
- Bucky Badger
- Chi-Chi's
- El Rey
- Essential Everyday
- Food Club
- Frescados
- Hy-Vee
- IGA
- La Bandertia
- La Burrita
- Mission
- Our Family

Rev. 12/2022 (WIC approved foods 11/1/22-10/31/25)

The second method to determine if a grain is WGR is using the WIC-approved Whole Grains List. If a grain product is found on any state's WIC-approved Whole Grains List, it automatically meets WGR criteria.

We have a handout that lists Wisconsin's WIC-approved whole grain products, which is shown and linked on this slide. You will see similar products discussed with the first method – bread, buns, rolls and pasta – however, this list identifies some specific brand names. It also includes additional products – tortillas, oats and brown rice. Any item on this list only needs to be verified by the name and information on the product package.

Product Labels: WIC-Approved Whole Grains List Method

When the item is on a WIC Approved Whole Grains list

See Wisconsin WIC Approved Whole Grains

Keep the Following On File

Product label or picture/copy of label (front of the package) that includes the name and brand of product

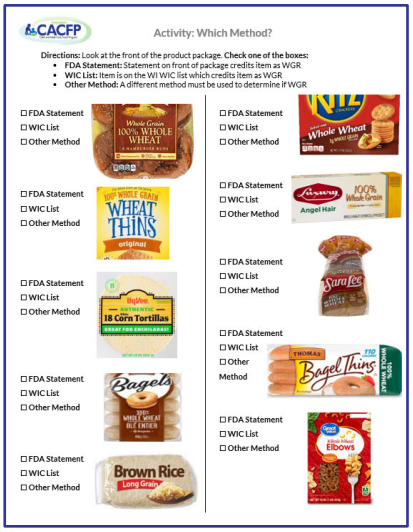
When you have determined a grain item is WGR because it is on a WIC-approved whole grains list, you must keep on file the product label or a picture of the label that includes the name and brand of the product.

Activity: Which Method?

FDA Statement: The statement on the front of the package credits the item as WGR.

WIC List: The item is on the WIC list.

Other method: A different method must be used to determine if the item is WGR.



Time for the first activity, called ‘Which Method?’

Look at the picture on the front of the product package and check the box in front of the method you would use to determine if this item meets WGR criteria.

Answers to the activity.

Method 3: FDA Health Claim on Product Package

"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."

"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."

Now, moving on to the third method to determine if a grain is WGR. If a grain's package includes one of these FDA Health Claims, it is WGR. Keep in mind, there are different versions of health claims, so you must ensure the health claim on the package is written exactly as those shown on this slide.

Product Labels: FDA Health Claim Method

When the item includes one of the following FDA Health Claims:

"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."

"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."

Keep the Following On File

Product label or picture/copy of label (front of the package) that includes the name and brand of product and the FDA Health Claim

When you have determined a grain as WGR due to the FDA Health Claim on the product's package, you must keep the product label or a picture of the label that includes the name and brand of the product, as well as the FDA Health Claim.

Method 4: Child Nutrition (CN) Label

When the grain ingredient is whole grain-rich, the CN Label will state the following:

X.XX oz. equivalent grains

CN

XXXXXX

Four 1.00 oz. fish nuggets provide 2.00 oz. equivalent meat/meat alternate and **1.00 oz. equivalent grains** for Child Nutrition Meal Pattern Requirements. (Use of this logo and statement authorized by the FNS, USDA 02/21).

CN

CN

CN

The fourth method to determine if a product is WGR is by the information on a Child Nutrition (CN) label or Product Formulation Statement (PFS). When the item is a commercially prepared, store-bought combination food that credits to the grain component, such as breaded chicken tenders, pizza, corn dogs and fish sticks, the CN label or PFS will indicate if it is WGR.

An example of a CN label for a product that meets WGR criteria is on this slide. The CN label will state an amount and the words “oz. equivalent grains.”

Product Formulation Statement (PFS)

The PFS will indicate if the item is whole grain-rich by the selection of 'Yes' or 'No.'

John Soules Foods "The Benchmark of Quality & Service" ProView Foods

Product Formulation Statement for Grains Products

(Contracting entities must retain a copy of the label from the product package in addition to the following information on the manufacturer's letterhead that is signed by an official company representative.)

Product Name: Fully Cooked "Buffalo Style" Chicken Breast Bites Code No.: 40030 WG

Manufacturer: John Soules Foods Acquisitions dba ProView Foods Serving Size: 2 oz. (4 PC)

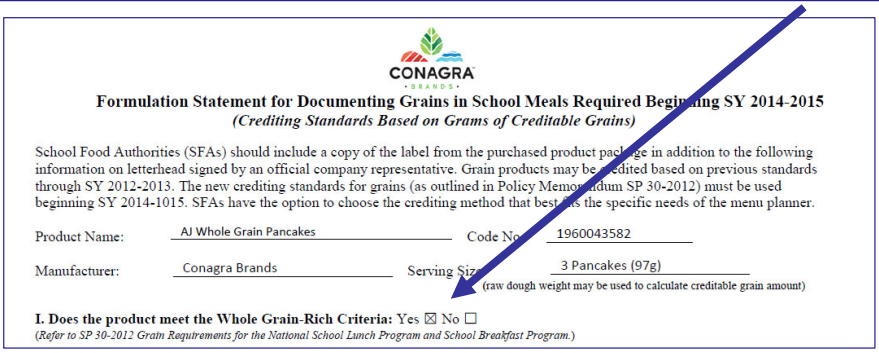
I. Does the product meet the Whole Grain-Rich Criteria: Yes X No

III. Use Policy Memorandum SP 30-2012 Grain Requirements for the National School Lunch Program and School Breakfast Program:

A PFS for commercially prepared, store-bought combination foods will indicate if the item is WGR by the selection of 'Yes' to the question, "Does this product meet the Whole Grain-Rich Criteria?"

Product Formulation Statement (PFS): Grain Items

The PFS will indicate if the item is whole grain-rich by the selection of 'Yes' or 'No.'



CONAGRA BRANDS

Formulation Statement for Documenting Grains in School Meals Required Beginning SY 2014-2015

(Crediting Standards Based on Grams of Creditable Grains)

School Food Authorities (SFAs) should include a copy of the label from the purchased product package in addition to the following information on letterhead signed by an official company representative. Grain products may be credited based on previous standards through SY 2012-2013. The new crediting standards for grains (as outlined in Policy Memorandum SP 30-2012) must be used beginning SY 2014-1015. SFAs have the option to choose the crediting method that best fits the specific needs of the menu planner.

Product Name: AJ Whole Grain Pancakes Code No. 1960043582

Manufacturer: Conagra Brands Serving Size 3 Pancakes (97g)

(raw dough weight may be used to calculate creditable grain amount)

I. Does the product meet the Whole Grain-Rich Criteria: Yes ☒ No ☐

(Refer to SP 30-2012 Grain Requirements for the National School Lunch Program and School Breakfast Program.)

A PFS may also be available for grain-only items such as bread, bagels, waffles, and English Muffins. Again, the PFS will indicate if the item is WGR by the selection of 'Yes' to the question, "Does this product meet the Whole Grain-Rich Criteria?" The example on the slide is part of a PFS for whole grain pancakes and specifies, yes, the product meets WGR criteria.

Non-WGR Items: The CN Label or PFS

CN Label:

X.XX oz. equivalent grains **(enriched)**

CN

XXXXXX

Four 1.00 oz. fish nuggets provide 2.00 oz. equivalent meat/meat alternate and **1.00 oz. equivalent grains (enriched)** for Child Nutrition Meal Pattern Requirements. (Use of this logo and statement authorized by the FNS, USDA 02/21).

CN CN CN

Product Formulation Statement:

I. Does the product meet the Whole Grain-Rich Criteria: Yes ☐ No ☒

(Refer to SP 30-2012 Grain Requirements for the National School Lunch Program and School Breakfast Program.)

So what does a CN label or PFS say when an item is not WGR?

If a CN label states oz. equivalent grains **with enriched in parenthesis after it**, or a PFS specifies '**No**' after the WGR question, the product does not meet WGR criteria.

Product Labels: CN Label/PFS Method

A WGR commercially prepared, store-bought combination food → Keep the CN Label or PFS on file.

A grain item is determined WGR based on a PFS → Keep the PFS on file.

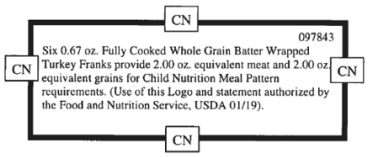
When the item is a commercially prepared, store-bought combination food item that credits to the grain component

Examples include breaded chicken tenders, pizza, corn dogs, fish sticks, etc.

Keep One of the Following On File

- Child Nutrition (CN) Label stating "oz. equivalent grains"
- Product Formulation Statement (PFS) from the manufacturer indicating the item meets WGR criteria

Child Nutrition (CN) Label



Product Formulation Statement

Does the product meet the Whole Grain-Rich Criteria: Yes ☒ No ☐

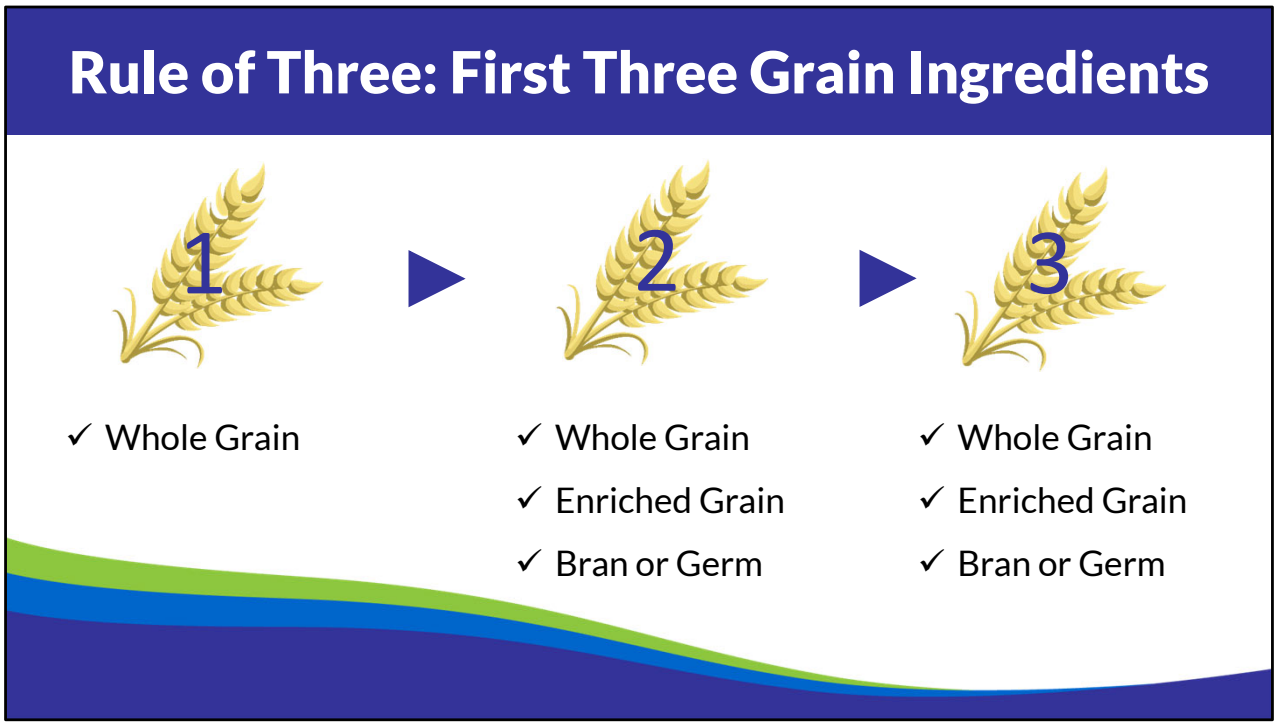
When you have determined commercially prepared, store-bought combination foods WGR, you must keep the CN label or PFS on file. You must also keep the PFS on file if that is what you used to determine a grain item as WGR.

Method 5: Rule of Three

Finally, we are going to talk about the fifth method, the Rule of 3. This is the most common method for determining grain items as WGR. If a PFS cannot be obtained for items such as bagels, crackers, waffles, pancakes, muffins, breadsticks, etc., then the Rule of 3 is how these items must be evaluated for meeting WGR criteria.

Ingredient List

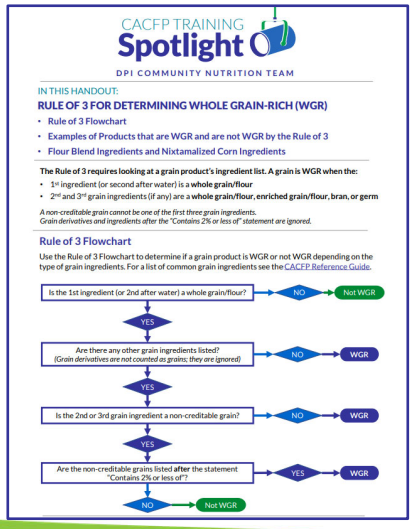
The Rule of 3 requires you to look at the ingredient list of a grain product. The ingredient list is always on the package of a product. It is often on the back side or may be on a side panel, and it is usually found under or next to the Nutrition Facts Label. Here are pictures of different ingredient lists.



The Rule of 3 requires you to look at the first three **grain** ingredients that appear in the ingredient list on the product package. Keep in mind, a grain item may not have three grain ingredients – it may only have one or two. If that is the case, you only look at the grain ingredients present.

In the Rule of 3, the **first ingredient must be a whole grain**. If the item has a second grain ingredient, it must be whole grain, enriched grain, bran or germ. If the item has a third grain ingredient, it must also be whole grain, enriched grain, bran or germ.

Rule of Three Flowchart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IN THIS HANDOUT:

RULE OF 3 FOR DETERMINING WHOLE GRAIN-RICH (WGR)

- Rule of 3 Flowchart
- Examples of Products that are WGR and are not WGR by the Rule of 3
- Flour Blend Ingredients and Nixtamalized Corn Ingredients

The Rule of 3 requires looking at a grain product's ingredient list. A grain is WGR when the:

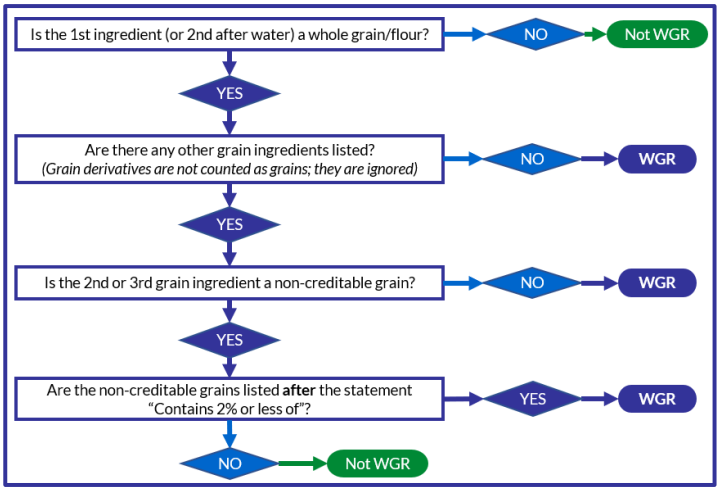
- 1st ingredient (or second after water) is a **whole grain/flour**
- 2nd and 3rd grain ingredients (if any) are a **whole grain/flour, enriched grain/flour, bran, or germ**

A non-creditable grain cannot be one of the first three grain ingredients.
Grain derivatives and ingredients after the "Contains 2% or less of" statement are ignored.

Rule of 3 Flowchart

Use the Rule of 3 Flowchart to determine if a grain product is WGR or not WGR depending on the type of grain ingredients. For a list of common grain ingredients see the CACFP Reference Guide.

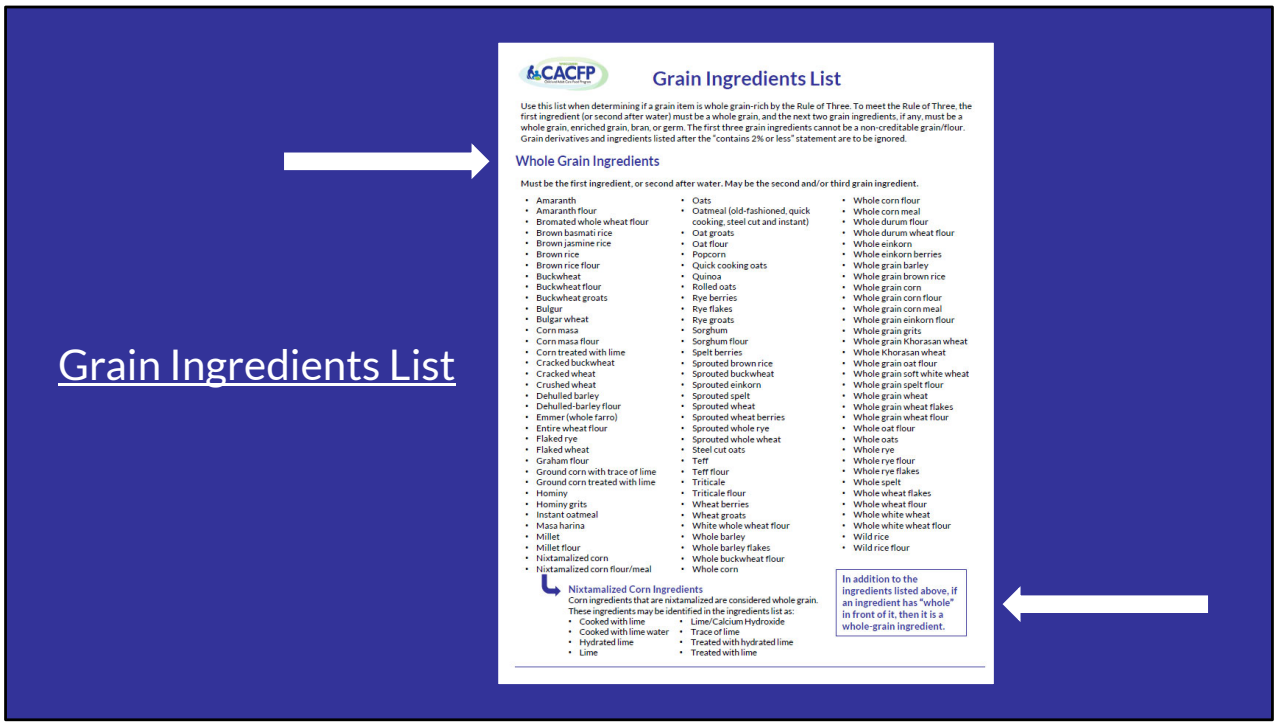
Is the 1st ingredient (or 2nd after water) a whole grain/flour? NO → Not WGR
YES
Are there any other grain ingredients listed? (Grain derivatives are not counted as grains; they are ignored) NO → WGR
YES
Is the 2nd or 3rd grain ingredient a non-creditable grain? NO → WGR
YES
Are the non-creditable grains listed **after** the statement "Contains 2% or less of"? YES → WGR
NO → Not WGR



CACFP Training Spotlight: Rule of 3 for Determining WGR

To go through the Rule of 3 examples throughout this presentation, the flowchart that is in the *CACFP Training Spotlight: Rule of 3 for Determining Whole Grain-Rich* will be used.

Grain Ingredients List



Grain Ingredients List

Use this list when determining if a grain item is whole grain-rich by the Rule of Three. To meet the Rule of Three, the first ingredient (or second after water) must be a whole grain, and the next two grain ingredients, if any, must be a whole grain, enriched grain, bran, or germ. The first three grain ingredients cannot be a non-creditable grain/flour. Grain derivatives and ingredients listed after the "contains 2% or less" statement are to be ignored.

Whole Grain Ingredients

Must be the first ingredient, or second after water. May be the second and/or third grain ingredient.

- Amaranth
- Amaranth flour
- Bromated whole wheat flour
- Brown basmati rice
- Brown jasmine rice
- Brown rice
- Brown rice flour
- Buckwheat
- Buckwheat flour
- Buckwheat groats
- Bulgur
- Bulgar wheat
- Corn masa
- Corn masa flour
- Corn treated with lime
- Cracked buckwheat
- Cracked wheat
- Crushed wheat
- Dehulled barley
- Dehulled-barley flour
- Emmer (whole farro)
- Entire wheat flour
- Flaked rye
- Flaked wheat
- Graham flour
- Ground corn with trace of lime
- Ground corn treated with lime
- Hominy
- Hominy grits
- Instant oatmeal
- Maza harina
- Millet
- Millet flour
- Nixtamalized corn
- Nixtamalized corn flour/meal
- Oats
- Oatmeal (old-fashioned, quick cooking, steel cut and instant)
- Oat groats
- Oat flour
- Popcorn
- Quick cooking oats
- Quinoa
- Rolled oats
- Rye berries
- Rye flakes
- Rye groats
- Sorghum
- Sorghum flour
- Spelt berries
- Sprouted brown rice
- Sprouted buckwheat
- Sprouted einkorn
- Sprouted spelt
- Sprouted wheat
- Sprouted wheat berries
- Sprouted whole rye
- Sprouted whole wheat
- Steel cut oats
- Teff
- Teff flour
- Triticale
- Triticale flour
- Wheat berries
- Wheat groats
- White whole wheat flour
- Whole barley
- Whole barley flakes
- Whole buckwheat flour
- Whole corn
- Whole corn flour
- Whole corn meal
- Whole durum flour
- Whole durum wheat flour
- Whole einkorn
- Whole einkorn berries
- Whole grain barley
- Whole grain brown rice
- Whole grain corn
- Whole grain corn flour
- Whole grain corn meal
- Whole grain einkorn flour
- Whole grain grits
- Whole grain Khorasan wheat
- Whole Khorasan wheat
- Whole grain oat flour
- Whole grain soft white wheat
- Whole grain spelt flour
- Whole grain wheat
- Whole grain wheat flakes
- Whole grain wheat flour
- Whole oat flour
- Whole oats
- Whole rye
- Whole rye flour
- Whole rye flakes
- Whole spelt
- Whole wheat flakes
- Whole wheat flour
- Whole white wheat
- Whole white wheat flour
- Wild rice
- Wild rice flour

Nixtamalized Corn Ingredients

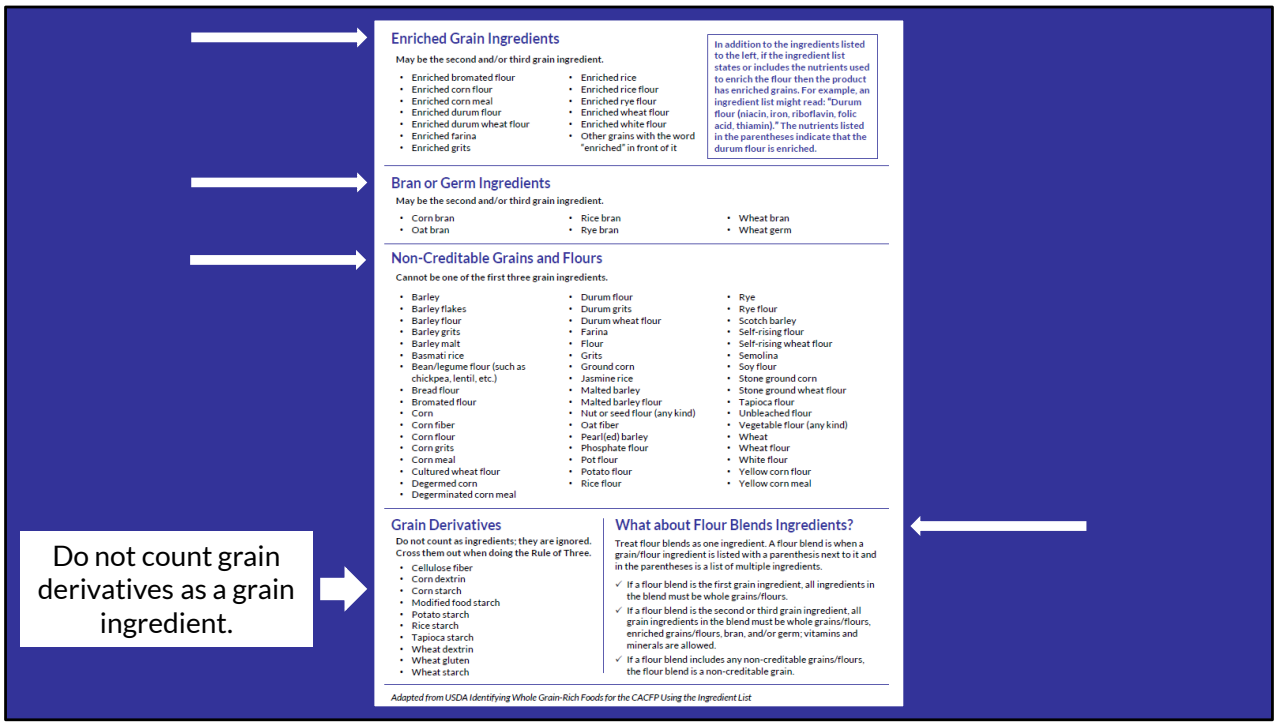
Corn ingredients that are nixtamalized are considered whole grain. These ingredients may be identified in the ingredients list as:

- Cooked with lime
- Cooked with lime water
- Hydrated lime
- Lime
- Lime/Calcium Hydroxide
- Trace of lime
- Treated with hydrated lime
- Treated with lime

In addition to the ingredients listed above, if an ingredient has "whole" in front of it, then it is a whole-grain ingredient.

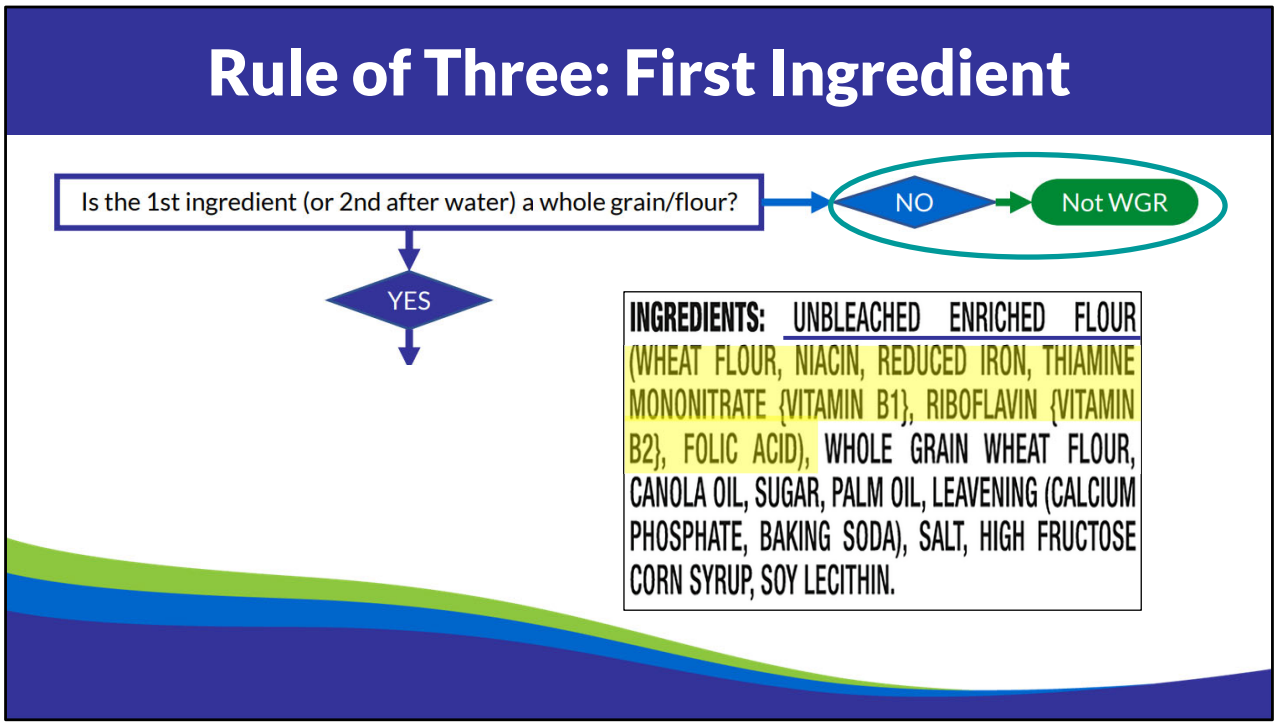
To use the Rule of 3, you must know what type of grain a grain ingredient is, so the *Grain Ingredients List* will also be used.

The front page provides a list of whole grain ingredients. While this whole grain list is lengthy, it is not all-inclusive. If an ingredient has the word "whole" in front of it, it is a whole grain ingredient.



The back page lists enriched grain ingredients, bran or germ ingredients, non-creditable grains and flours, information about flour blends (which will be discussed later) and grain derivatives.

When you come across an ingredient that is a grain derivative, you ignore it and do not count it as a grain. You will also ignore any ingredients that appear after the statement 'contains 2% or less of' in the ingredient list. This is noted at the top of the front page.

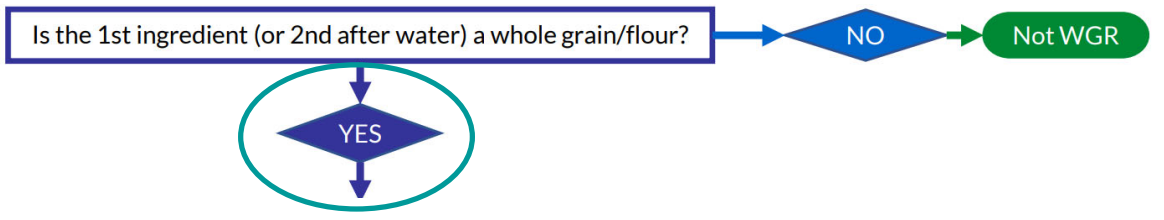


Now let's go through some examples using the flowchart. Start at the top and ask the first question: Is the **first ingredient** (or 2nd after water) a **whole grain or flour**? Use the item's ingredient list and the list of whole grains on the *Grain Ingredients List*.

If the answer is no, the first ingredient is not a whole grain or flour, then the item is not WGR. See the example on this slide. The first ingredient is unbleached enriched flour. The term 'enriched' clearly identifies the ingredient as an enriched flour, not a whole flour. Therefore, this item is not WGR.

Note: The unbleached enriched flour is followed by some items in parentheses. The items in the parentheses are the ingredients that make up the unbleached enriched flour. In this case, wheat flour has been enriched with vitamins to produce the unbleached enriched flour. When you see a **whole or enriched** grain ingredient with parentheses after it, only look at the name of the grain ingredient before the set of parentheses. If the name of the grain ingredient does not specify whole or enriched, you must look inside the parenthesis to determine if it is whole and/or creditable. This will be discussed in more detail later in the presentation.

Rule of Three: First Ingredient

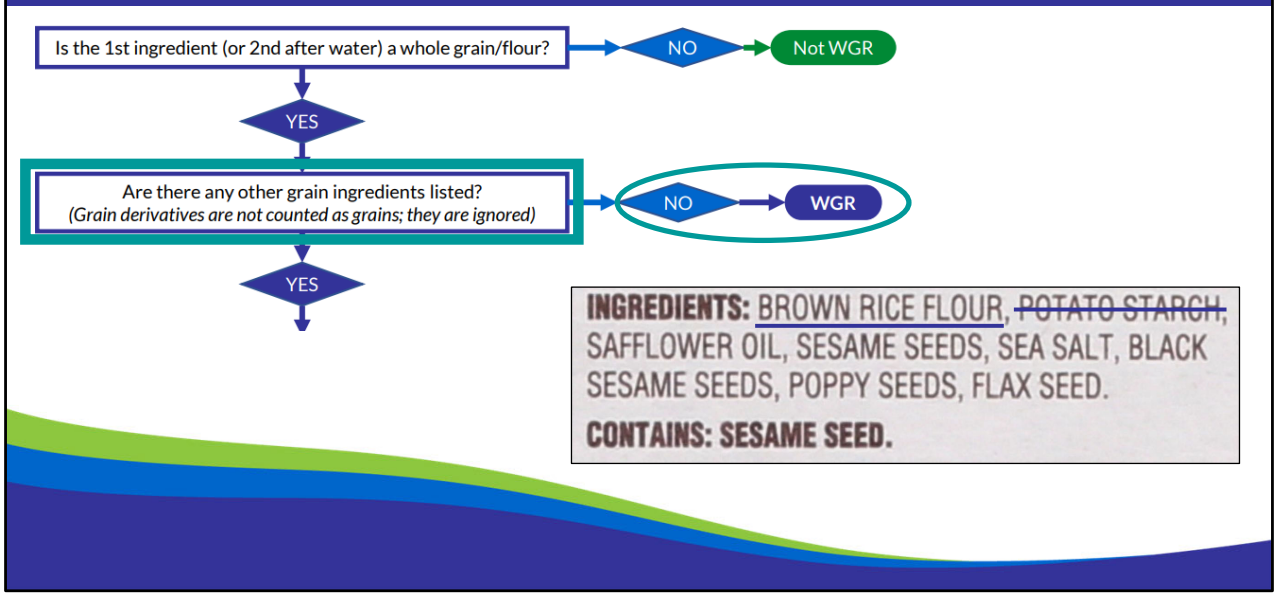


INGREDIENTS: BROWN RICE FLOUR, POTATO STARCH, SAFFLOWER OIL, SESAME SEEDS, SEA SALT, BLACK SESAME SEEDS, POPPY SEEDS, FLAX SEED.

CONTAINS: SESAME SEED.

Another example of the first question in the flowchart is shown on this slide. The first ingredient is a whole flour, so we answer yes, and move to the next question in the flowchart.

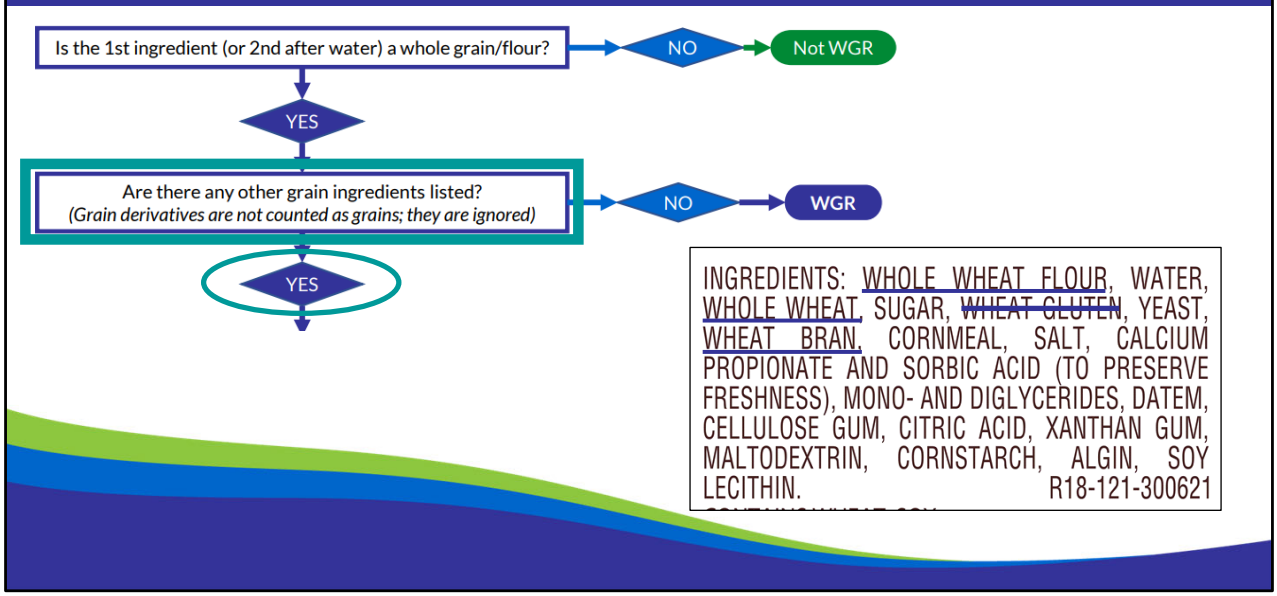
Rule of Three: Second or Third Grain Ingredients



We must continue through the item's ingredient list to answer the next question: Are there any other grain ingredients listed?

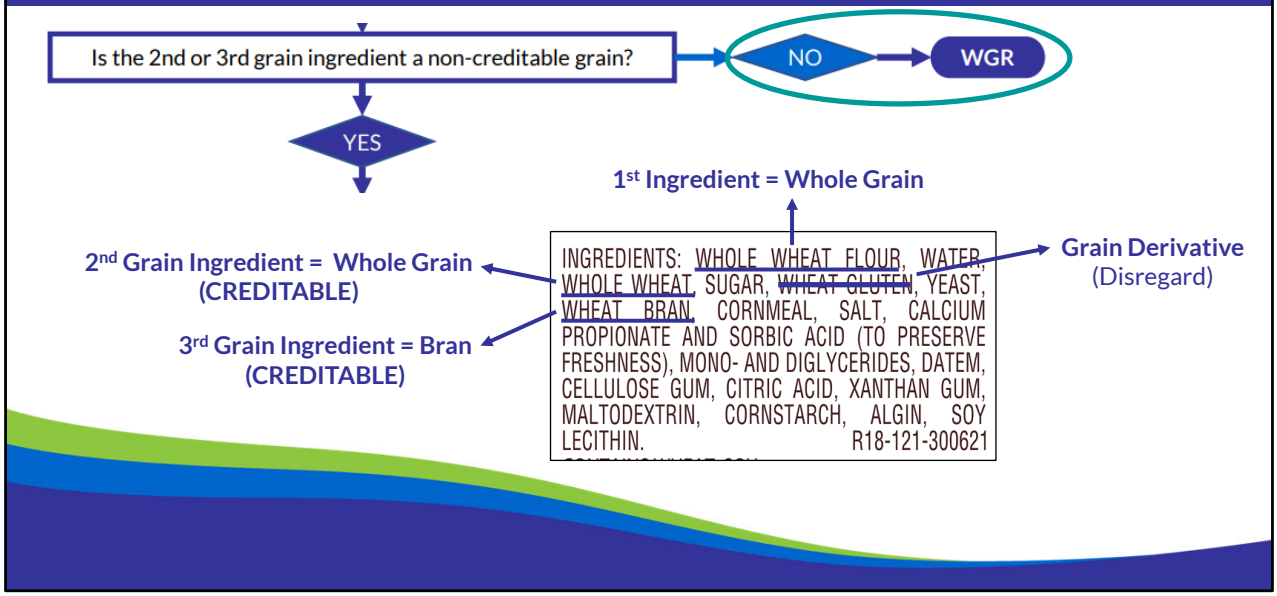
So, looking at the same example as the previous slide, we see another grain ingredient – potato starch. However, potato starch is a grain derivative, so it is ignored. There are no other grains in the ingredient list, so the answer is no, there are no other grain ingredients listed and, therefore, this item is WGR.

Rule of Three: Second or Third Grain Ingredients



Let's look at another example for the second question in the flowchart. The first ingredient is whole wheat flour, which is a whole flour. We move through the ingredient list to determine if there are other grain ingredients listed. We see whole wheat, wheat gluten (grain derivative; ignored) and wheat bran. So, the answer is yes, there are other grain ingredients listed, and we move to the next question in the flowchart.

Rule of Three: Second or Third Grain Ingredients

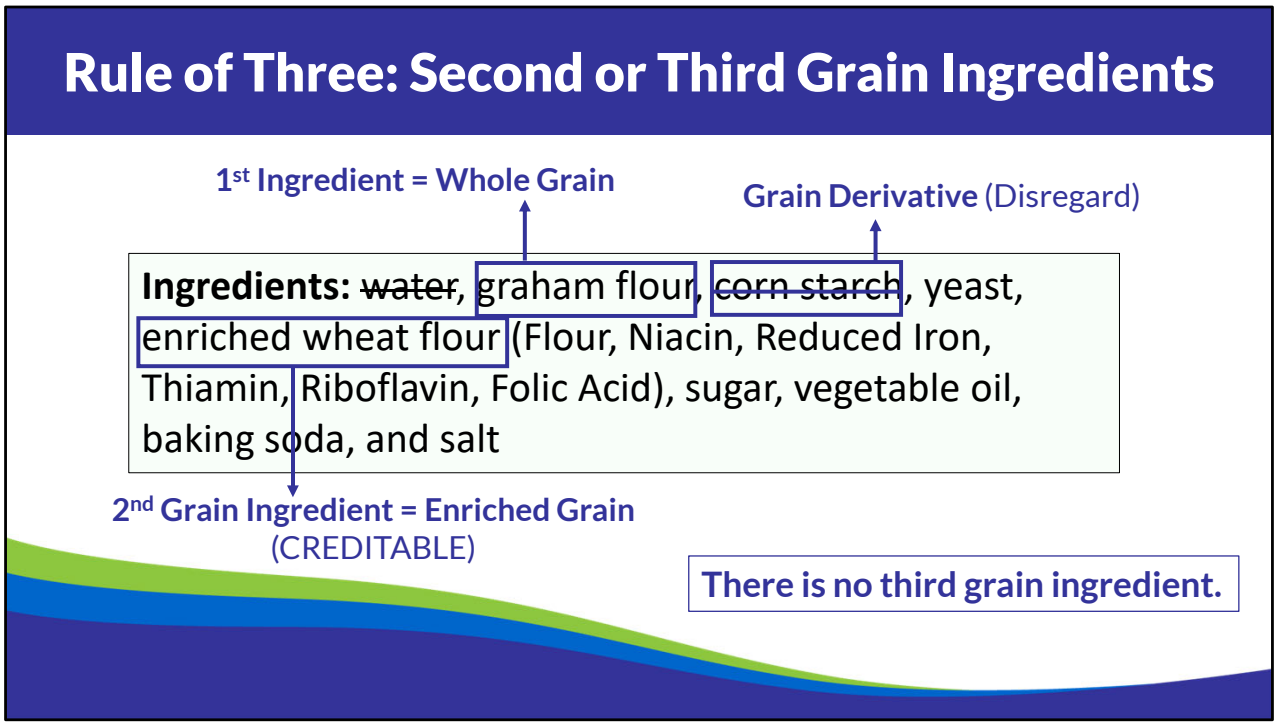


The next question asks: Is the second or third **grain** ingredient a non-creditable grain?

Looking at the same example as the previous slide, we already established the first ingredient is a whole grain. Moving through the ingredient list, the second grain ingredient is whole wheat. This is a whole grain, so it **is** creditable.

The next grain ingredient is wheat gluten, which is a grain derivative, so we ignore it. Therefore, the third grain ingredient is wheat bran. This is a type of bran, so it **is** creditable.

So, the answer is no, the second and third grain ingredients are **not** non-creditable, so this item is WGR.

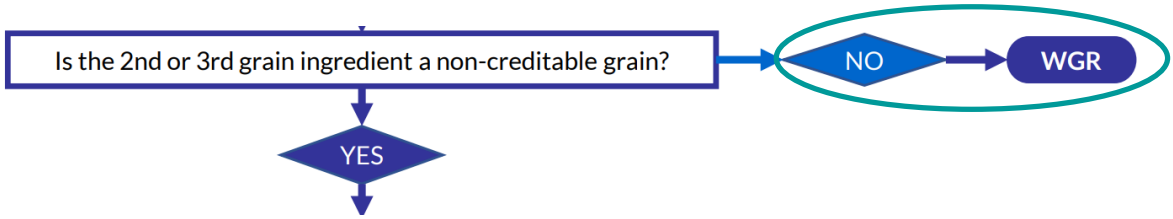


Here is another example. Water is the first ingredient, so we skip to the first grain ingredient – graham flour, which is a whole grain. The second grain ingredient is corn starch, which is a grain derivative, so we disregard. Therefore, the second grain ingredient is enriched wheat flour, which is an enriched grain and creditable.

Remember, everything in the parenthesis after the enriched wheat flour is ignored because the name indicates this ingredient is enriched.

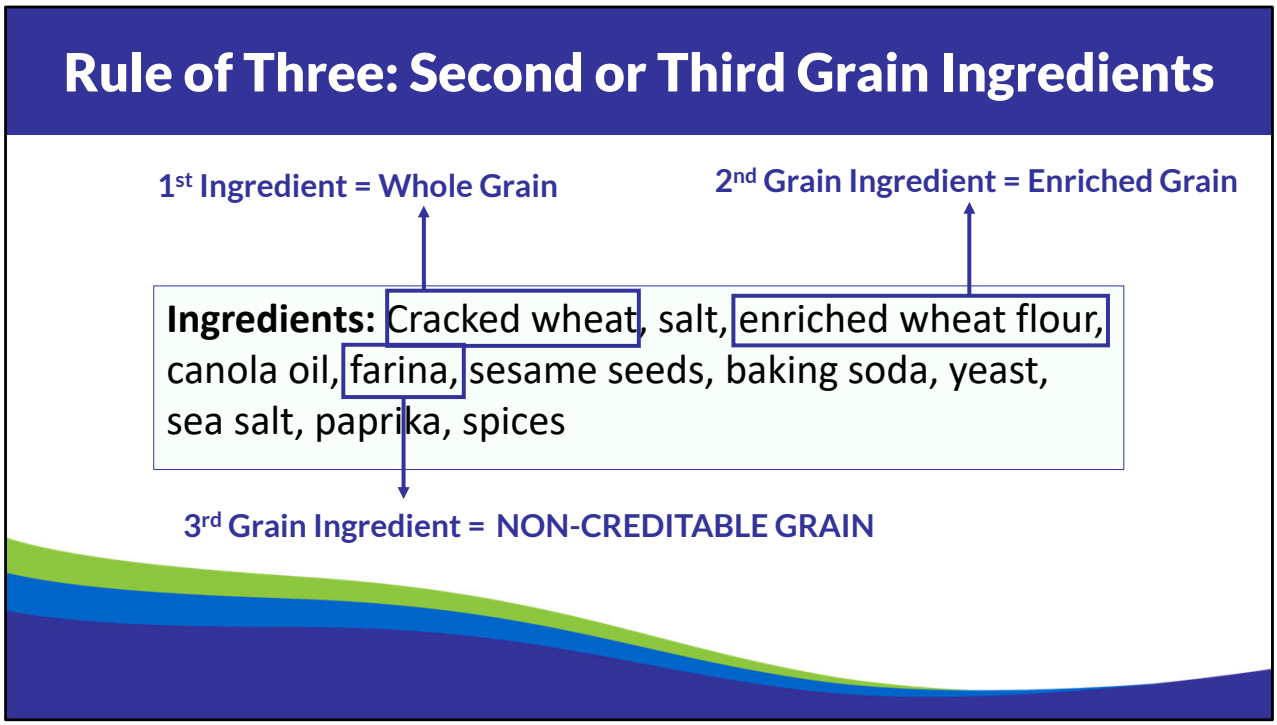
Looking through the rest of the ingredient list, there is no third grain ingredient.

Rule of Three: Second or Third Grain Ingredients



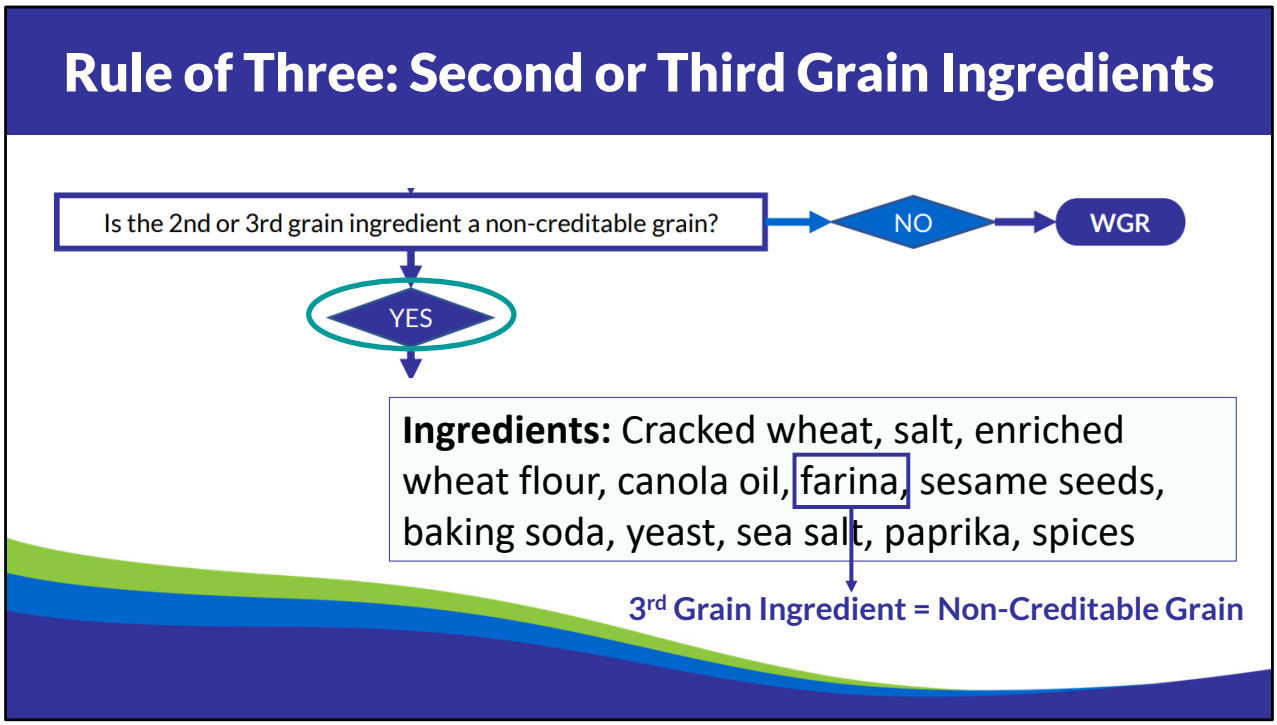
So, going back to the flowchart for that example, we ask this question: Is the second grain ingredient a non-creditable grain?

The answer is no, the second grain ingredient was an enriched grain, which is creditable. Therefore, this grain item is WGR.



Let's go through another example that presents a different situation.

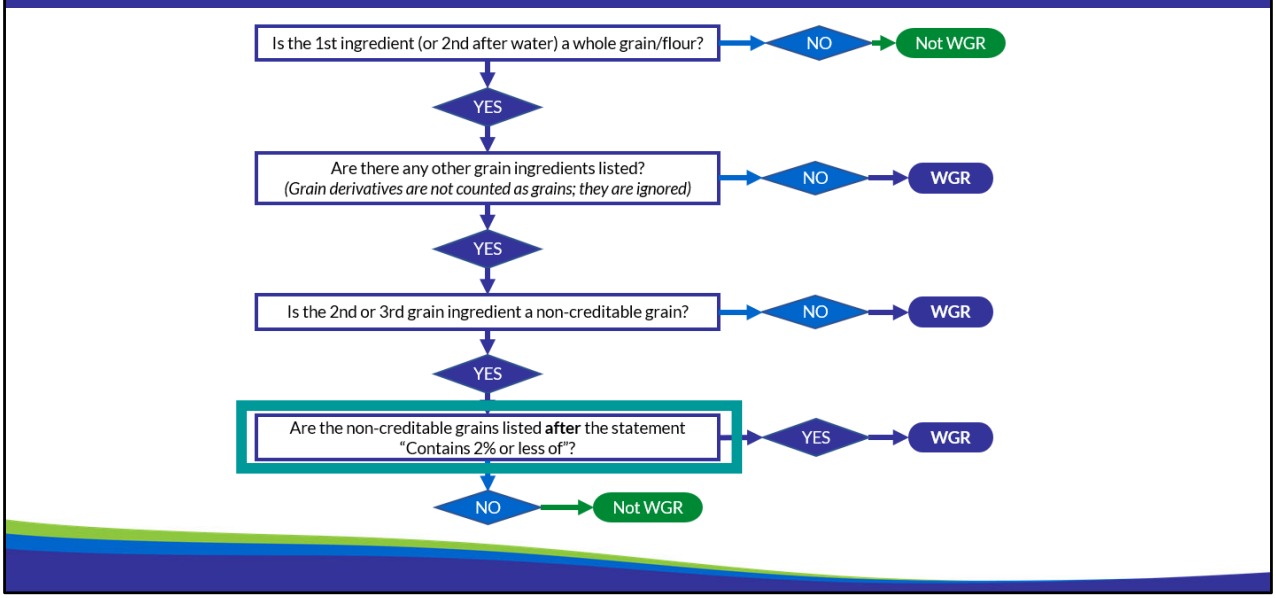
The first ingredient is cracked wheat, which is a whole grain. The second **grain** ingredient is enriched wheat flour, which is an enriched grain and creditable. The third **grain** ingredient is farina, which is a non-creditable grain.



So, going back to the flowchart, we ask this question: Is the second or third grain ingredient a non-creditable grain?

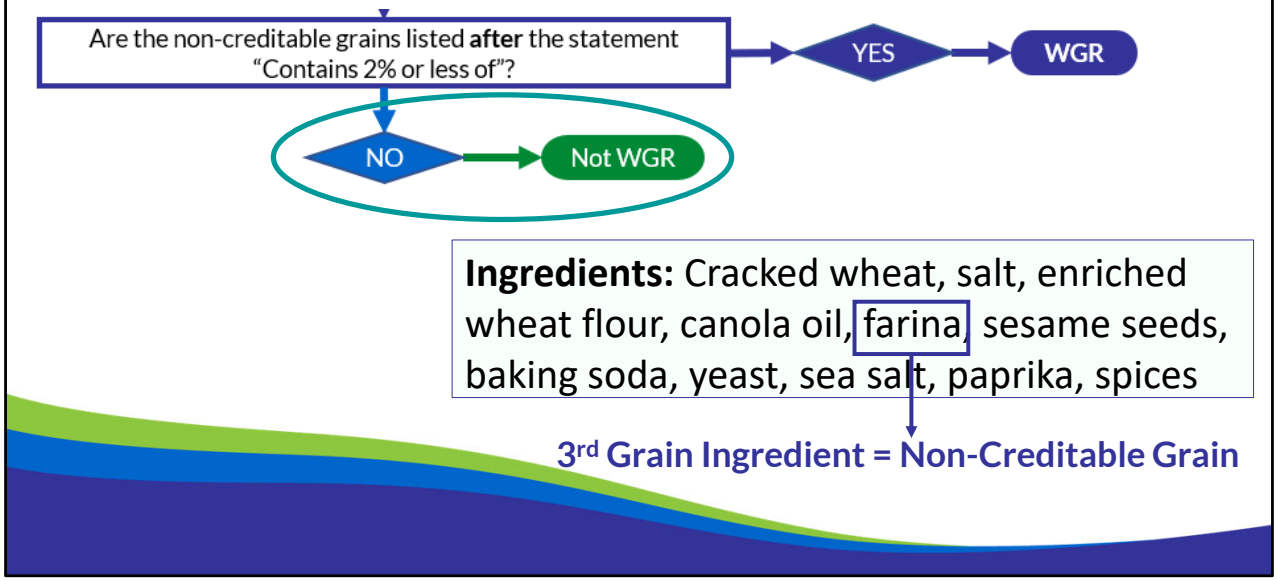
The answer is yes, the third grain ingredient is a non-creditable grain (farina). We then move to the next question in the flowchart.

Rule of Three: "Contains 2% or Less of"



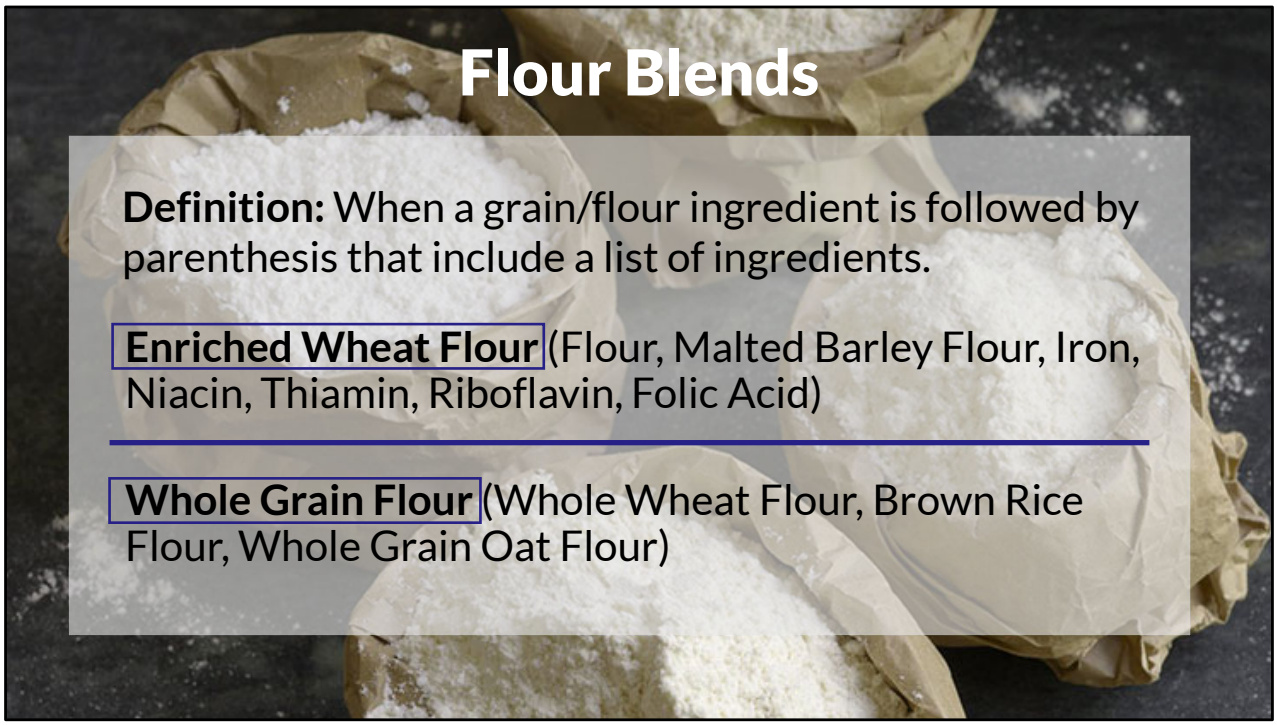
The next question in the flowchart is: Are the non-creditable grains listed after the statement 'contains 2% or less of?'

Rule of Three: "Contains 2% or Less of"



There isn't a '2% or less of' statement in this ingredient list, so the answer is no, the non-creditable grain does **not** come after the 'contains 2% or less of' statement and, therefore, this item is not WGR.

If the non-creditable grain did come after the 'contains 2% of less of' statement, the answer would be yes and the item would be WGR.

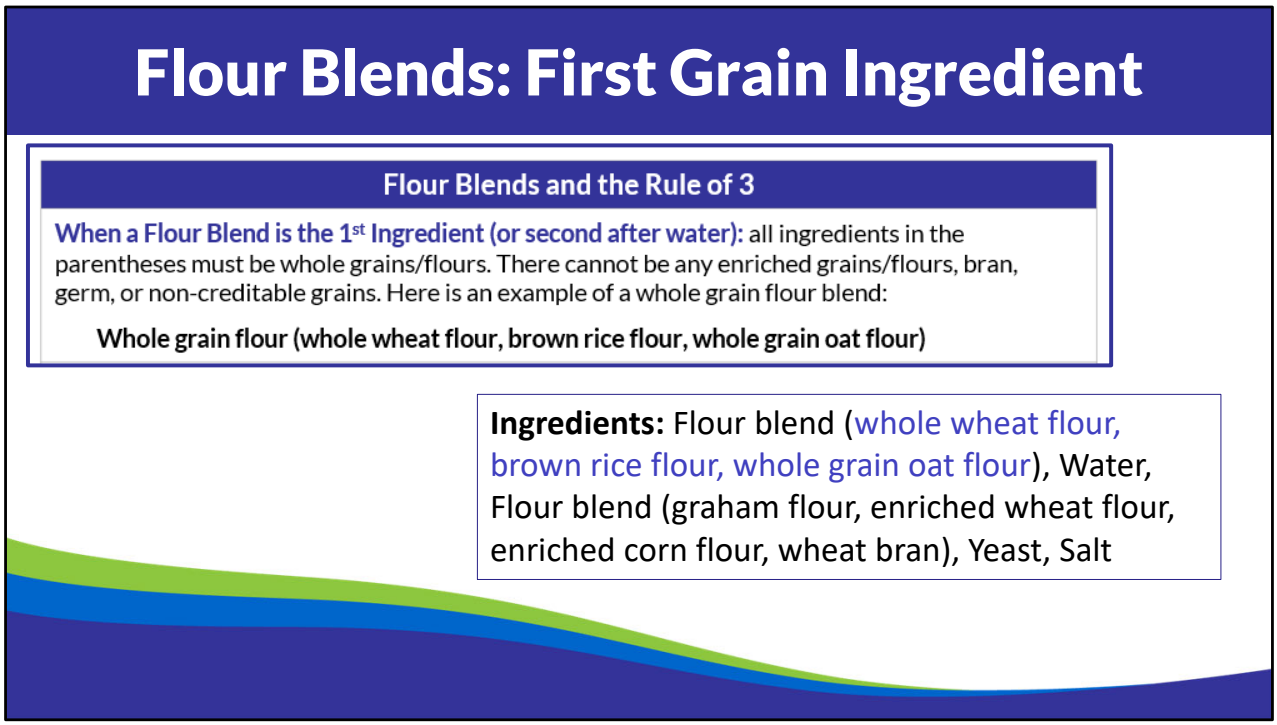


As mentioned earlier, the presentation will now discuss flour blends. A flour blend is when a grain or flour ingredient is listed with parentheses after it, and in the parentheses is a list of ingredients. Two examples are on the slide.

In the first example, the enriched wheat flour is the grain ingredient and in the parenthesis are the ingredients that make up the enriched wheat flour. As mentioned earlier, when applying the Rule of 3, treat flour blends that are identified as enriched or whole in the name as one ingredient. In this example, the enriched wheat flour is the grain ingredient, and since it is identified as enriched in the name, you do not count the flour and malted barley in the parentheses as separate grain ingredients.

In the second example, the whole grain flour is the grain ingredient and is made up of the flours listed in the parentheses. Like the enriched example above, you do not count the ingredients in the parenthesis as separate grain ingredients since this flour is identified as a whole flour in the name.

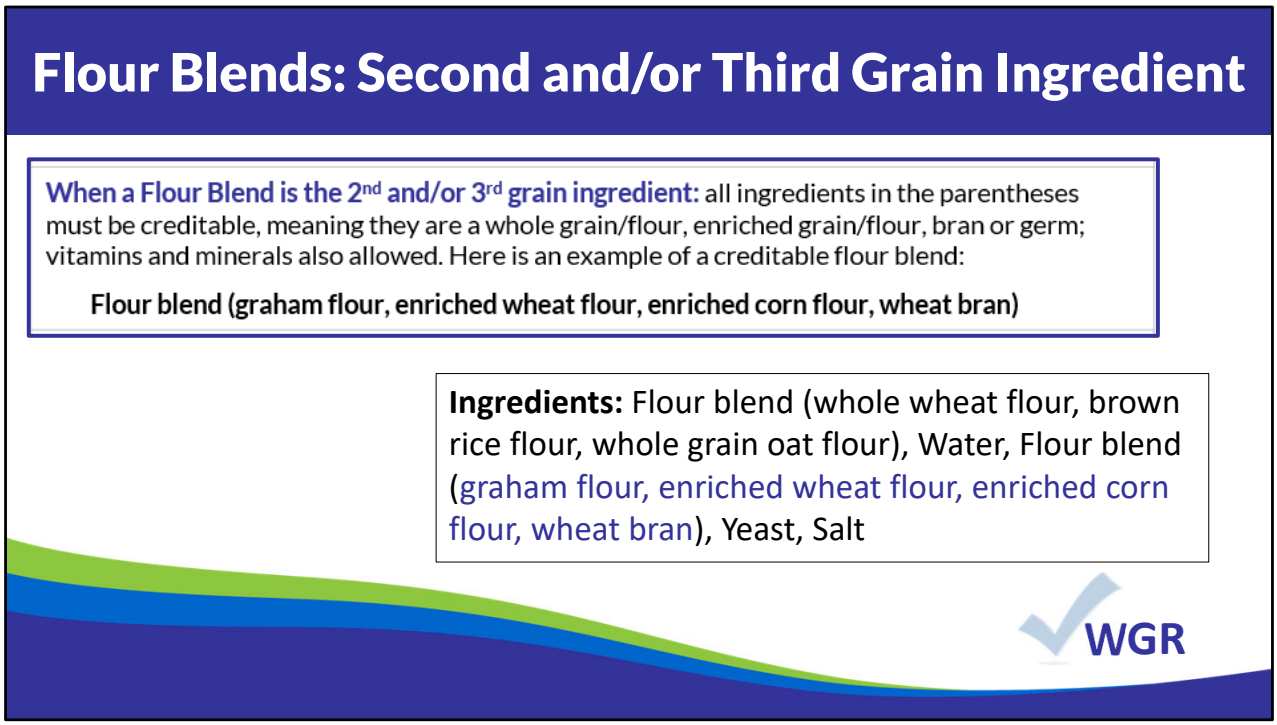
However, if an ingredient list states flour blend only, you must look in the parenthesis to determine if the flour blend is a whole grain and/or creditable. Examples of this situation are on the following three slides.



This information is on the last page of the *CACFP Training Spotlight: Rule of 3 for Determining Whole Grain-Rich*.

For a grain item to be WGR when a flour blend is the first ingredient, all ingredients in the parentheses must be whole grains or flours.

In this example, the first ingredient is a flour blend made up of the flours listed in blue in the parentheses: whole wheat flour, brown rice flour and whole grain oat flour. This flour blend contains only whole flours, so it is a whole flour blend.



If a flour blend is the second or third grain ingredient, all ingredients in the parentheses must be creditable, meaning they are whole grains, enriched grains, bran or germ. Vitamins and minerals are also allowed.

Looking at the same example, we already determined the first ingredient to be a whole flour blend. The second **grain** ingredient is a flour blend and is made up of the flours listed in blue in the parentheses: graham flour, which is a whole grain, enriched wheat flour, enriched corn flour and wheat bran. All of these grain ingredients are whole or enriched, so this flour blend is creditable, and because there is no third grain ingredient to determine, this product is WGR.

Non-Creditable Flour Blends

If there are any non-creditable grains/flours, the entire flour blend is a non-creditable grain.
Here is an example of a non-creditable flour blend (soy flour and potato flour are non-creditable grains):

Flour blend (graham flour, soy flour, potato flour)

Ingredients: Flour blend (whole wheat flour, brown rice flour, whole grain oat flour), Water, Flour blend (durum flour, bromated flour, brown rice flour), Salt, Yeast

Non-Creditable Grains

X NOT WGR

However, if a flour blend includes any **non-creditable** grains or flours, then the entire flour blend is **not a creditable grain**.

In this example, the first flour blend is the same as the previous example, which we already determined to be a whole flour blend. The second grain ingredient is another flour blend that includes two non-creditable flours – durum flour and bromated flour. Therefore, this flour blend is not a creditable grain ingredient. Because it is the second grain ingredient of this product, and it is not a creditable grain ingredient, the item is not WGR.

Non-Whole Grain-Rich Items

Most grains that are not WGR can still be served as the grain item.

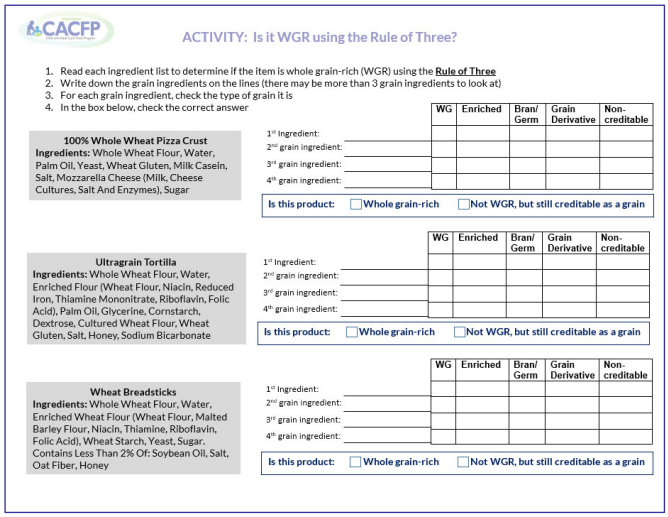
- First ingredient (or second after water) must be a whole grain, enriched grain, bran, or germ; or
- Ingredient list includes nutrients to enrich or fortify the grain ingredient; or
- Product is labeled 'enriched,' 'fortified,' or 'whole grain'

Grains with other first ingredients (ex. sugar or a non-creditable grain) cannot be served unless documentation from the manufacturer includes grams of creditable grain per serving.

However, if a grain product does not meet WGR criteria, it may still be served as a grain in a meal or snack.

For a grain that does not meet WGR criteria to be creditable, the first ingredient (or second after water) must be a whole grain, enriched grain, bran or germ. If the first ingredient (or second after water) is something else, such as sugar or a non-creditable grain, the item is not creditable and cannot be served as a grain in a meal or snack.

Activity: Is it WGR using the Rule of Three?



CACFP

ACTIVITY: Is it WGR using the Rule of Three?

1. Read each ingredient list to determine if the item is whole grain-rich (WGR) using the **Rule of Three**
2. Write down the grain ingredients on the lines (there may be more than 3 grain ingredients to look at)
3. For each grain ingredient, check the type of grain it is
4. In the box below, check the correct answer

100% Whole Wheat Pizza Crust
Ingredients: Whole Wheat Flour, Water, Palm Oil, Yeast, Wheat Gluten, Milk Casein, Salt, Mozzarella Cheese (Milk, Cheese Cultures, Salt And Enzymes), Sugar

	WG	Enriched	Bran/ Germ	Grain Derivative	Non-creditable
1st Ingredient:					
2nd grain ingredient:					
3rd grain ingredient:					
4th grain ingredient:					

Is this product: ☐ Whole grain-rich ☐ Not WGR, but still creditable as a grain

Ultragrain Tortilla
Ingredients: Whole Wheat Flour, Water, Enriched Flour (Wheat Flour, Niacin, Reduced Iron, Thiamine Mononitrate, Riboflavin, Folic Acid), Palm Oil, Glycerine, Cornstarch, Dextrose, Cultured Wheat Flour, Wheat Gluten, Salt, Honey, Sodium Bicarbonate

	WG	Enriched	Bran/ Germ	Grain Derivative	Non-creditable
1st Ingredient:					
2nd grain ingredient:					
3rd grain ingredient:					
4th grain ingredient:					

Is this product: ☐ Whole grain-rich ☐ Not WGR, but still creditable as a grain

Wheat Breadsticks
Ingredients: Whole Wheat Flour, Water, Enriched Wheat Flour (Wheat Flour, Malted Barley Flour, Niacin, Thiamine, Riboflavin, Folic Acid), Wheat Starch, Yeast, Sugar, Contains Less Than 2% Of: Soybean Oil, Salt, Oat Fiber, Honey

	WG	Enriched	Bran/ Germ	Grain Derivative	Non-creditable
1st Ingredient:					
2nd grain ingredient:					
3rd grain ingredient:					
4th grain ingredient:					

Is this product: ☐ Whole grain-rich ☐ Not WGR, but still creditable as a grain

Time for the second activity, called “Is it WGR using the Rule of Three?”

Look at each product’s ingredient list and list each grain ingredient, identify what type of grain it is using the *Grain Ingredient List*, and then select if the product is WGR or not.

100% Whole Wheat Pizza Crust

Ingredients: Whole Wheat Flour, Water, Palm Oil, Yeast, Wheat Gluten, Milk Casein, Salt, Mozzarella Cheese (Milk, Cheese Cultures, Salt And Enzymes), Sugar

		WG	Enriched	Bran/ Germ	Grain Derivative	Non-creditable
1st Ingredient:	Whole Wheat Flour	✖				
2nd grain ingredient:	Wheat Gluten				✖	
3rd grain ingredient:						
4th grain ingredient:						

Is this product: ✖ Whole grain-rich ☐ Not WGR, but still creditable as a grain

Answers to the 100% Whole Wheat Pizza Crust.

Ultragrain Tortilla

Ingredients: Whole Wheat Flour, Water, Enriched Flour (Wheat Flour, Niacin, Reduced Iron, Thiamine Mononitrate, Riboflavin, Folic Acid), Palm Oil, Glycerine, Cornstarch, Dextrose, Cultured Wheat Flour, Wheat Gluten, Salt, Honey, Sodium Bicarbonate

		WG	Enriched	Bran/ Germ	Grain Derivative	Non-creditable
1st Ingredient:	Whole Wheat Flour	✖				
2nd grain ingredient:	Enriched Flour		✖			
3rd grain ingredient:	Cornstarch				✖	
4th grain ingredient:	Cultured Wheat Flour					✖

Is this product: ☐ Whole grain-rich ☒ Not WGR, but still creditable as a grain

Answers to the Ultragrain Tortilla.

Wheat Breadsticks

Ingredients: Whole Wheat Flour, Water, Enriched Wheat Flour (Wheat Flour, Malted Barley Flour, Niacin, Thiamine, Riboflavin, Folic Acid), Wheat Starch, Yeast, Sugar. Contains Less Than 2% Of: Soybean Oil, Salt, Oat Fiber, Honey

		WG	Enriched	Bran/ Germ	Grain Derivative	Non-creditable
1st Ingredient:	Whole Wheat Flour	✖				
2nd grain ingredient:	Enriched Wheat Flour		✖			
3rd grain ingredient:	Wheat Starch				✖	
4th grain ingredient:	Oat Fiber					✖

Is this product: ✖ Whole grain-rich ☐ Not WGR, but still creditable as a grain

Answers to the Wheat Breadsticks.

Crackers Made with Whole Grain

Ingredients: Enriched flour (wheat flour, niacin, reduced iron, thiamin mononitrate, riboflavin, folic acid), whole wheat flour, vegetable oil, cheese made with skim milk (skim milk, whey protein, salt, cheese cultures, enzymes, annatto extract color). Contains 2% or less of salt, paprika, yeast, paprika extract color, soy lecithin

		WG	Enriched	Bran/ Germ	Grain Derivative	Non-creditable
1st Ingredient:	Enriched Flour		✖			
2nd grain ingredient:	Whole Wheat Flour	✖				
3rd grain ingredient:						
4th grain ingredient:						

Is this product: ☐ Whole grain-rich ☒ Not WGR, but still creditable as a grain

Answers to the Crackers made with Whole Grain.

Multigrain Waffles 8 Whole Grains

Ingredients: Water, 8 whole grains mix (whole wheat, oat, barley, brown rice, dark rye, quinoa, amaranth and millet flours), canola oil, wheat bran, oat fiber, cane sugar, baking powder, malt extract, sea salt, organic honey, cinnamon, soy lecithin

		WG	Enriched	Bran/ Germ	Grain Derivative	Non-creditable
1st Ingredient:	8 Whole Grains Mix	✖				
2nd grain ingredient:	Wheat Bran			✖		
3rd grain ingredient:	Oat Fiber					✖
4th grain ingredient:						

Is this product: ☐ Whole grain-rich ☒ Not WGR, but still creditable as a grain

Answers to the Multigrain Waffles.

Product Labels: Rule of Three

Keep One of the Following On File

- Product label or picture/copy of label that includes:
  - Name and brand of product (front of the package)
  - Ingredients list (ingredients must meet the Rule of 3)
- Product specification sheet that includes the name and brand of item and the Ingredients list (ingredients must meet the Rule of 3)

When using the Rule of 3 to determine a product as WGR, you must keep the product label or a picture of the label on file, and it must include the name and brand of the product, and the ingredient list.

Homemade Items

WGR = At least half of the grain ingredients are whole grains, and the remaining grain ingredients are enriched grain, bran, or germ.

Next, we will switch topics to homemade items. Homemade items can be WGR when at least half of the grain ingredients are whole grains, such as whole wheat flour, and the remaining grain ingredients are enriched grain, bran, or germ.

Documentation for Homemade Items

Keep the Following On File

Recipe that identifies all ingredients and grain ingredient amounts by weight or volume. The recipe must show at least 50% of grains are whole grains and the remaining grains are enriched.

Whole Wheat Muffins

Ingredients

1 cup flour (all purpose)
1 cup whole wheat flour
1/2 teaspoon salt
2 teaspoons baking powder
1/4 cup brown sugar
1 cup milk, low-fat (1%)
2 egg
1 teaspoon vanilla (optional)
1/4 cup margarine or butter (melted, or 1/4 cup vegetable oil)
1 tablespoon sugar
1/2 teaspoon cinnamon (ground)

Documentation requirements for WGR homemade items include a recipe to show that at least 50% of grains are whole grains and the remaining grains are enriched, bran or germ, and the label for the whole grain ingredients.

The recipe on the slide shows 50% of the flour is whole wheat flour, and the product package for the whole wheat flour is maintained on file to support the recipe.

Box Mixes

Ingredients & Allergens

INGREDIENTS: WHOLE WHEAT FLOUR BLEACHED, SUGAR, PALM OIL, MODIFIED CORN STARCH. CONTAINS 2% OR LESS OF: LEAVENING (SODIUM ACID PYROPHOSPHATE, BAKING SODA, MONOCALCIUM PHOSPHATE), DEXTROSE, SALT, NONFAT MILK, EGGS WITH SODIUM SILICOALUMINATE, MONO AND DIGLYCERIDES, XANTHAN GUM, SOY FLOUR.

Additionally, if making a WGR store-bought item, such as a box mix, keep the product package (including the name and ingredients) on file to support the Rule of 3.

Ready-to-Eat Breakfast Cereals

Whole Grain-Rich when:

- ✓ The first ingredient is a whole grain/flour and
- ✓ The cereal is fortified.

Ingredients → **Whole Grain**

Whole Grain Oats, Corn Starch, Sugar, Salt, Tripotassium Phosphate. Vitamin E (mixed tocopherols) **Added to Preserve Freshness.**

GLUTEN FREE

Fortified ←

Vitamins and Minerals

Calcium Carbonate, Iron and Zinc (mineral nutrients), **Vitamin C** (sodium ascorbate), **A B Vitamin** (niacinamide), **Vitamin B_6** (pyridoxine hydrochloride), **Vitamin A** (palmitate), **Vitamin B_1** (thiamin mononitrate), **A B Vitamin** (folic acid), **Vitamin B_{12}, Vitamin D_3.**

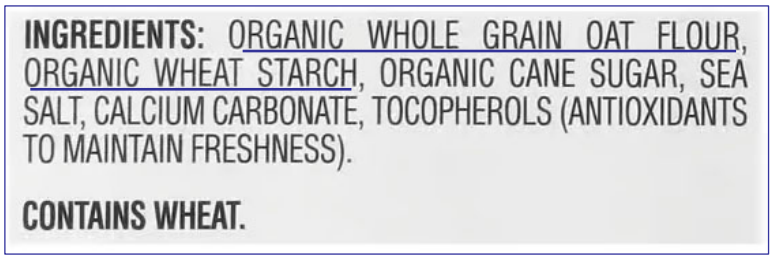
Lastly, let's talk about ready-to-eat breakfast cereals since the method to determine if they are WGR is different. If the first ingredient is a whole grain or flour and the cereal is fortified, then the cereal is WGR. You do not need to use the Rule of 3.

To determine if the cereal is fortified, the product will be labeled as 'fortified' or the ingredient list will include the vitamins and minerals that have been added to the product, as shown on the slide.

Non-Fortified Cereals

The Rule of Three must be completed to determine if WGR criteria is met.

Organic Cereals →



WGR

Cereals that are not fortified do not have any added vitamins and minerals. This is often true for organic cereals.

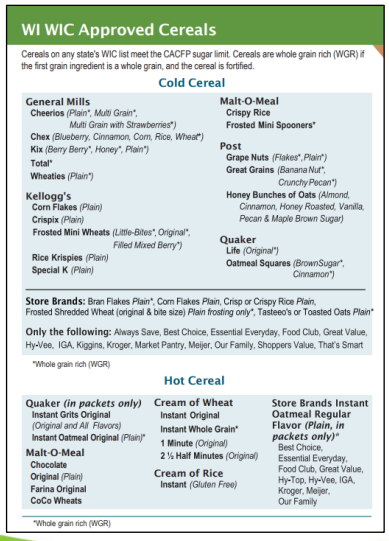
If the cereal has a whole grain as the first ingredient, but is **not** fortified, then you must complete the Rule of 3 to look at the second and third grain ingredients to determine if it meets WGR criteria.

Wisconsin WIC-Approved Cereals

CACFP Reference Guide

(Spanish CACFP Reference Guide)

- All cereals meet sugar limits, and
- Cereals with an asterisk (*) after the name are WGR.



WI WIC Approved Cereals

Cereals on any state's WIC list meet the CACFP sugar limit. Cereals are whole grain rich (WGR) if the first grain ingredient is a whole grain, and the cereal is fortified.

Cold Cereal

General Mills
Cheerios *(Plain*, Multi Grain*, Multi Grain with Strawberries*)*
Chex *(Blueberry, Cinnamon, Corn, Rice, Wheat*)*
Kix *(Berry Berry*, Honey*, Plain*)*
Total*
Wheaties *(Plain*)*

Kellogg's
Corn Flakes *(Plain)*
Crispix *(Plain)*
Frosted Mini Wheats *(Little-Bites*, Original*, Filled Mixed Berry*)*
Rice Krispies *(Plain)*
Special K *(Plain)*

Malt-O-Meal
Crispy Rice
Frosted Mini Spooners*

Post
Grape Nuts *(Flakes*, Plain*)*
Great Grains *(Banana Nut*, Crunchy Pecan*)*
Honey Bunches of Oats *(Almond, Cinnamon, Honey Roasted, Vanilla, Pecan & Maple Brown Sugar)*

Quaker
Life *(Original*)*
Oatmeal Squares *(BrownSugar*, Cinnamon*)*

Store Brands: Bran Flakes *Plain**, Corn Flakes *Plain*, Crisp or Crispy Rice *Plain*, Frosted Shredded Wheat (original & bite size) *Plain frosting only**, Tasteeo's or Toasted Oats *Plain**

Only the following: Always Save, Best Choice, Essential Everyday, Food Club, Great Value, Hy-Vee, IGA, Kiggins, Kroger, Market Pantry, Meijer, Our Family, Shoppers Value, That's Smart

*Whole grain rich (WGR)

Hot Cereal

Quaker *(in packets only)*
Instant Grits Original *(Original and All Flavors)*
Instant Oatmeal Original *(Plain)**

Malt-O-Meal
Chocolate
Original *(Plain)*
Farina Original
CoCo Wheats

Cream of Wheat
Instant Original
Instant Whole Grain*
1 Minute *(Original)*
2 ½ Half Minutes *(Original)*

Cream of Rice
Instant *(Gluten Free)*

Store Brands Instant Oatmeal Regular Flavor *(Plain, in packets only)** Best Choice, Essential Everyday, Food Club, Great Value, Hy-Top, Hy-Vee, IGA, Kroger, Meijer, Our Family

*Whole grain rich (WGR)

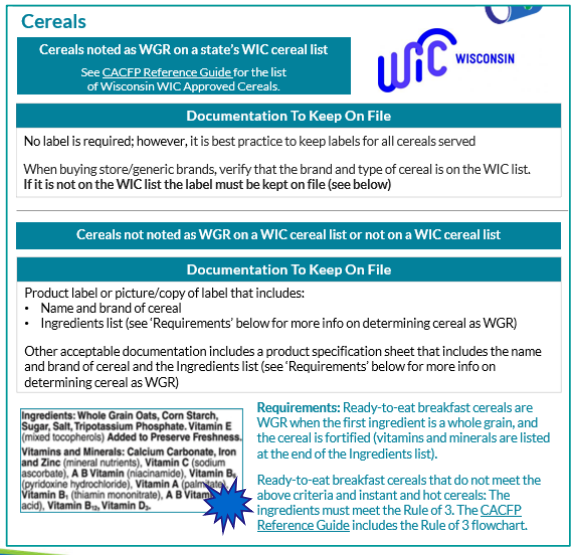
The *CACFP Reference Guide* includes a list of WI WIC-Approved Cereals that are creditable to the CACFP. All cereals on this list meet the CACFP sugar limit, and cereals that are notated with an asterisk (*) are WGR.

Note: WIC updated its list of cereals in November last year, so the reference guide has been updated. This has not been printed and we do not plan to print new copies at this time, but you can print the reference guide from the DPI website or access WIC's cereal list through the WIC website.

Product Labels: WGR Cereal

WGR cereal on the WIC list does not require product documentation be kept on file.

WGR cereal NOT on the WIC list requires the product label be kept on file, including the name, brand and ingredient list.



The last page of the *CACFP Training Spotlight: Documentation of WGR Foods* identifies the required documentation for WGR cereals.

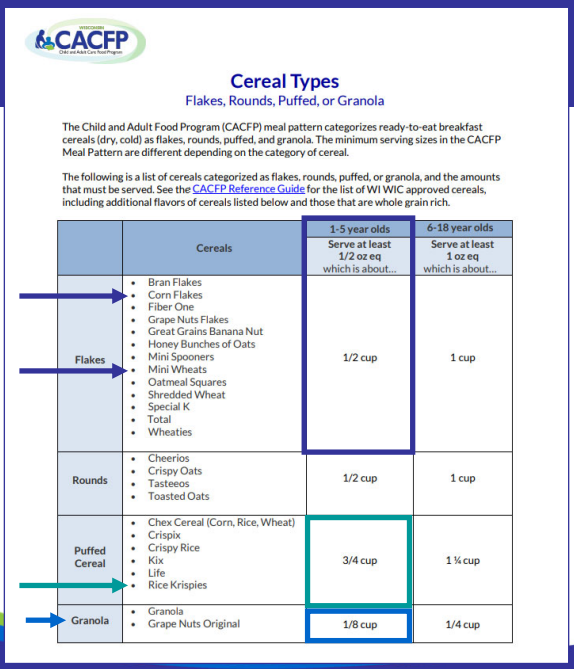
If the cereal is identified as WGR on the WIC list, and it is the exact brand and type, no label is required. However, if a cereal is not on the WIC list, you must keep the product label (or a picture of the label) that includes the name, brand and ingredient list on file.

Cereal Types

Cereal Types Handout
(Spanish Version)

(Cereal Types Handout: Adult Daycare Centers)
(Spanish Version: Adult Daycare Centers)

Minimum serving sizes vary depending on the type of cereal: Flakes, Rounds, Puffed and Granola.



CACFP

Cereal Types
Flakes, Rounds, Puffed, or Granola

The Child and Adult Food Program (CACFP) meal pattern categorizes ready-to-eat breakfast cereals (dry, cold) as flakes, rounds, puffed, and granola. The minimum serving sizes in the CACFP Meal Pattern are different depending on the category of cereal.

The following is a list of cereals categorized as flakes, rounds, puffed, or granola, and the amounts that must be served. See the CACFP Reference Guide for the list of WI WIC approved cereals, including additional flavors of cereals listed below and those that are whole grain rich.

	Cereals	1-5 year olds Serve at least 1/2 oz eq which is about…	6-18 year olds Serve at least 1 oz eq which is about…
Flakes	• Bran Flakes • Corn Flakes • Fiber One • Grape Nuts Flakes • Great Grains Banana Nut • Honey Bunches of Oats • Mini Spooners • Mini Wheats • Oatmeal Squares • Shredded Wheat • Special K • Total • Wheaties	1/2 cup	1 cup
Rounds	• Cheerios • Crispy Oats • Tasteeos • Toasted Oats	1/2 cup	1 cup
Puffed Cereal	• Chex Cereal (Corn, Rice, Wheat) • Crispix • Crispy Rice • Kix • Life • Rice Krispies	3/4 cup	1 ¼ cup
Granola	• Granola • Grape Nuts Original	1/8 cup	1/4 cup

A final note is regarding the serving size for cereals. When grains were changed from being measured as 'servings' to 'ounce equivalents' in 2021, ready-to-eat breakfast cereals were categorized by type. There are four categories: Flakes, Rounds, Puffed, and Granola.

The minimum serving sizes in the *CACFP Meal Pattern* are different depending on the category of cereal. This is because serving sizes are now based on weight, and certain cereals are denser than others.

For example, when serving a flake cereal like Mini Wheats or Corn Flakes, the minimum serving size for a 1-5-year-old is ½ oz eq which is ½ cup, versus, when serving a puffed cereal like Rice Krispies, the minimum serving size for a 1-5-year-old is ¾ cup. Rice Krispies are less dense than Mini Wheats so more must be served to provide ½ oz eq. Conversely, when serving granola, a lesser amount must be served because granola is denser.

CACFP TRAINING
Child and Adult Care Food Program

Thank you!

This institution is an equal opportunity provider.