

Commissioner's Memo
8/8/2017

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

Memo Information

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Memo Type Regulatory

Unit Child Nutrition

Regulatory Authority Richard B. Russell National School Act, USDA Memo SP 15-2011, CACFP Memo 16-2017, 7CFR Part 226.20

Response Required NO

Attention Superintendents; Principals

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Memo Text

ATTENTION CO-OP DIRECTORS, CHILD NUTRITION DIRECTORS, PRE-K PROGRAM DIRECTORS

This memorandum provides flexibility in the service of grain-based desserts in the Child and Adult Care Food Program (CACFP). This information applies to all School Food Authorities (SFAs) who provide meals for Pre-K students under the National School Lunch Program (NSLP) and School Breakfast Programs (SBP).

The Dietary Guidelines for Americans 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 percentage of calories, is particularly high in children.

Establishing limits on sugar, saturated fat, and other nutrients would require program operators to evaluate each grain item they serve against the nutrient standards, greatly increasing complexity and burden on program 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 meal pattern. Initially, 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; Questions and Answers*" (Exhibit A). This included sweet crackers as grain-based desserts which would have eliminated the use of sweet crackers such as graham crackers (all shapes) and animal crackers in the revised CACFP meal pattern.

Stakeholder feedback indicates that 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. They are frequently served in the program.

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FNS has made revisions in the Exhibit A allowing the use of graham crackers and sweet crackers in the revised CACFP meal pattern for Pre-K students. As a best practice, FNS encourages SFAs who serve sweet crackers to do so on a limited basis because of their higher fat content and added sugar.

This revision does not change the designation of sweet crackers for the School Meal Programs K-12 meal pattern requirements.

Items with the superscript 5 are allowed and credit toward the Pre-K reimbursable meals. Items with the superscript 3 and 4 are considered grain-based desserts and cannot credit as part of the Pre-K reimbursable meal.

Program operators may on occasion still serve grain-based desserts in the pre-K program. These items will not credit as part of the reimbursable meal and should be served only occasionally.

FNS will continue to monitor any challenges associated with grain-based desserts to determine if more guidance is needed.

If you have questions concerning the use of grain-based desserts, email your area specialist or contact them at 501-324-9502.

Attachments

- [CNU-18-006--CACFP16-2017.pdf](#)
- [CNU-18-006--Exhibit_A_Grain_Requirement_for_the_Child_Nutrition_Programs.pdf](#)