




STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Sponsors of School Child Nutrition Programs

FROM: John Frassinelli, Chief 
Bureau of Health/Nutrition, Family Services and Adult Education

DATE: April 11, 2014

SUBJECT: Operational Memorandum #22-14
Evaluating Products for Compliance with the Whole Grain-rich Criteria for School Nutrition Programs

The U.S. Department of Agriculture (USDA) regulations for the National School Lunch Program (NSLP) and School Breakfast Program (SBP) require that for school year 2013-14, at least half of the grains offered in the NSLP and SBP must be whole grain-rich (WGR). Effective July 1, 2014, all grains must be WGR. The Connecticut State Department of Education's (CSDE) [operational memorandum 22-12](#) dated May 3, 2012, explains the requirements for grains including the implementation of ounce equivalents and definition of WGR products. The information below provides additional clarification regarding the WGR requirements and how to evaluate grain products for compliance.

For a product to meet the USDA's WGR definition, it must meet the three criteria below.

1. The product contains **at least 50 percent** whole grains by weight.
2. Any remaining grain ingredients in the product must be **enriched**.
3. If the product contains any **noncreditable grains**, they must be present at **levels less than two percent** ($\frac{1}{4}$ ounce equivalent) of the product formula. To meet this limit, the combined total of all noncreditable grains cannot exceed 3.99 grams for groups A-G (baked goods) or 6.99 grams for group H (cereal grains) and group I (ready-to-eat breakfast cereals). **If noncreditable grains exceed these amounts, the entire product is considered noncreditable, even if the product meets the first two criteria above.**

Please note that these WGR criteria have been in place since July 1, 2012, when implementation of the new NSLP meal pattern began, as required by the Healthy, Hunger-Free Kids Act of 2010. The USDA has recently provided additional clarification regarding noncreditable grains.

During administrative reviews of the NSLP, the CSDE school nutrition staff often observe that school food authorities (SFAs) are not reviewing noncreditable grain content when determining whether to use grain products as part of school meals. **Effective July 1, 2014, non-WGR grain products do not meet the USDA requirements for the grains component of reimbursable school meals.** Therefore, it is critical that SFAs review the package labels or product formulation statements to ensure that all grain products for school meals meet the WGR requirements.

The CSDE's handout, [Criteria for Whole Grain-rich Foods](#), provides guidance to help SFAs evaluate grain products and determine whether they meet the WGR requirements, **including the**

limit for noncreditable grains. The WGR evaluation process includes the three steps below.

1. Determine if whole grains are at least 50 percent of the product's total weight.
2. Determine if all other grain ingredients in the product are enriched.
3. Determine if the product contains noncreditable grains, and if so, whether their combined weight exceeds the specified limit.

SFAs should carefully review the information in this handout to ensure that all steps are followed for each grain product used as part of reimbursable school meals.

In addition, effective July 1, 2014, the [Connecticut Nutrition Standards](#) apply the WGR requirements to all grain products sold separately from reimbursable meals. Public school districts participating in Healthy Food Certification (HFC) under [Section 10-215f](#) of the Connecticut General Statutes must use the same three steps to determine if grain products sold a la carte meet the Connecticut Nutrition Standards.

To be sold a la carte in HFC districts, a WGR product must also meet all nutrient standards, e.g., calories, fat, saturated fat, trans fat, sodium and sugars. Grain products that are WGR and meet the nutrient standards are listed on the CSDE's [List of Acceptable Foods and Beverages](#), a brand-specific list of foods that meet the Connecticut Nutrition Standards and beverages that meet the requirements of [Section 10-221q](#) of the Connecticut General Statutes.

Questions may be directed to:

COUNTY ASSIGNMENTS	CONSULTANT	E-MAIL AND PHONE
Fairfield County	Fionnuala Brown	fionnuala.brown@ct.gov 860-807-2129
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Hartford County (towns/cities beginning with S-W) Windham County	Susan Alston	susan.alston@ct.gov 860-807-2081
Litchfield County	Allison Calhoun-White	allison.calhoun-white@ct.gov 860-807-2008
Middlesex County Tolland County	Andy Paul	andrew.paul@ct.gov 860-807-2048
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Attachment

This is a numbered Operational Memorandum that contains important program information. Please read carefully and retain in a binder for future reference. Operational Memoranda are posted on the Connecticut State Department of Education's [Child Nutrition Web site](#).

CRITERIA FOR WHOLE GRAIN-RICH FOODS

in the U.S. Department of Agriculture (USDA) School Nutrition Programs

For school year 2013-14, at least half of the grains offered in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) must be whole grain-rich (WGR). Effective July 1, 2014, all grains must be WGR. To credit at lunch or breakfast, all grain products must also meet the serving size requirements in the USDA ounce equivalents chart, [Whole Grain-rich Ounce Equivalents Requirements for School Nutrition Programs](#).

In addition, effective July 1, 2014, the [Connecticut Nutrition Standards](#) apply the same WGR criteria to all grain products sold separately from reimbursable meals in public school districts participating in Healthy Food Certification (HFC) under [Section 10-215f](#) of the Connecticut General Statutes. To be sold a la carte in HFC districts, grain products must be WGR and meet all nutrient standards, e.g., calories, fat, saturated fat, trans fat, sodium and sugars. Grain products that meet these criteria are listed on the Connecticut State Department of Education's (CSDE) [List of Acceptable Foods and Beverages](#).

To meet the WGR definition, grain products must comply with the three criteria below.

1. The product contains **at least 50 percent whole grains**, as indicated by at least one of the following criteria:
 - contains at least 8 grams of whole grains per ounce equivalent for groups A-G of the USDA ounce equivalents chart and provides the required volume or weight for groups H and I of the USDA ounce equivalents chart;
 - includes the Food and Drug Administration's (FDA) whole grain health claim; or
 - lists a whole grain first on the product's ingredients statement.

For more information on evaluating products for compliance with this criterion, see Step 1 on page 2.

2. Any remaining grain ingredients in the product must be **enriched**. For more information on evaluating products for compliance with this criterion, see Step 2 on page 3.
3. If the product contains any **noncreditable grains**, they must be present at levels less than two percent ($\frac{1}{4}$ ounce equivalent) of the product formula. To comply with this limit, the combined total of all noncreditable grains cannot exceed 3.99 grams for groups A-G (baked goods) or 6.99 grams per serving for group H (cereal grains) and group I (ready-to-eat breakfast cereals). **If noncreditable grains exceed these amounts, the entire product is considered noncreditable, even if the product meets the first two criteria above.** For more information on evaluating products for compliance with this criterion, see Step 3 on page 4.

Foods that qualify as WGR contain either 100 percent whole grains (every grain ingredient is whole grain) or a blend of whole-grain meal/flour and enriched meal/flour of which at least 50 percent is whole grain. To determine if foods are WGR, schools must review package labels and product formulation statements (PFS), using the three steps below.

1. Determine if whole grains are at least 50 percent of the product's total weight.
2. Determine if all other grain ingredients in the product are enriched.
3. Determine if the product contains noncreditable grains, and if so, whether their combined weight exceeds the specified limit.

Detailed guidance on each step follows. Pages 7-9 provide examples that demonstrate how to evaluate a product's ingredient statement for compliance with the three WGR criteria.

STEP 1 – DETERMINE IF WHOLE GRAINS ARE AT LEAST 50 PERCENT

The USDA defines three criteria to determine whether a product contains at least 50 percent whole grains by weight. To contain at least 50 percent whole grains, products must meet **at least one** of the three criteria below.

1. **Minimum Grain Content:** For groups A-G in the USDA ounce equivalents chart, *Whole Grain-Rich Ounce Equivalents Requirements for School Nutrition Programs*, the product contains **at least 8 grams** of whole grains per ounce equivalent as listed on the package label or manufacturer's PFS. For groups H-I, schools must offer the following volumes or weights listed in the USDA ounce equivalents chart to credit as 1 ounce equivalent:

- Group H: ½ cup cooked or 1 ounce (28 grams) dry of cereal grains such as pasta, brown rice, oatmeal and quinoa; and
- Group I: 1 ounce of ready-to-eat cold dry breakfast cereals, e.g., 1 cup of flakes or rounds, 1 ¼ cups of puffed cereal and ¼ cup of granola.



The grain content of these foods can be determined from information provided on the product packaging or by a PFS supplied by the manufacturer.

2. **Whole Grain Health Claim:** The product includes the FDA's whole grain health claim on the product packaging. The FDA allows two health claims for whole-grain foods.
 - Low-fat claim: "Diets rich in whole grain foods and other plant foods and low in total fat, saturated fat, and cholesterol, may help reduce the risk of heart disease and certain cancers."
 - Moderate-fat claim: "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."

The health claim on the package label must be identical to either one of these two FDA claims. For consistency with the *Dietary Guidelines for Americans*, the USDA recommends choosing grain products with the FDA's low-fat health claim.

3. **Whole Grain is First Ingredient:** The product lists a whole grain first on the ingredients statement. This is the simplest method of identifying if a product contains at least 50 percent whole grains.
 - **Grain products (such as bread and cereals):** For foods containing only the grains component, a whole grain must be the first ingredient listed with an exception for water. If the first ingredient of a grain product is water and the second ingredient is a whole grain, the product contains at least 50 percent whole grain (see example 1 in "Sample Product Ingredient Statements" on page 7).

When the whole grain content comes from **multiple ingredients**, the combined whole grain ingredients may be the primary ingredient by weight even though a whole grain is not listed as the first ingredient. These products could meet the WGR criteria with proper manufacturer documentation. For example, a PFS indicates that a bread contains three grain

CRITERIA FOR WHOLE GRAIN-RICH FOODS, continued

ingredients: enriched flour (40 percent of grains), whole wheat (30 percent of grains) and whole oats (30 percent of grains). For this product, whole grains are the primary ingredient by weight since the combined 60 percent whole grain ingredients (whole wheat and whole oats) are greater than the enriched flour (40 percent), even though the enriched flour may be listed first in the ingredient statement.

- **Mixed dishes (such as pizza and breaded chicken patties):** For mixed dishes that contain other food components besides grains such as meat/meat alternates and vegetables, a whole grain must be the **primary grain ingredient** by weight, i.e., a whole grain is the first grain ingredient in the list of grains. For school-made foods, menu planners must use the standardized recipe to calculate whether the total weight of whole-grain ingredients exceeds the total weight of ingredients that are not whole grain. For example, if a pizza recipe contains 6 pounds of whole-wheat flour and 5 pounds of enriched flour, with no noncreditable grain ingredients, the whole-wheat flour weighs more than the enriched flour. Therefore, this recipe contains more than 50 percent whole grains and meets the three WGR criteria.

STEP 2 – DETERMINE IF ANY OTHER GRAINS ARE ENRICHED

Enriched grains are refined grains (such as wheat, rice and corn) and grain products (such as cereal, pasta and bread) that have vitamins and minerals added to replace the nutrients lost during processing. These nutrients are added within limits specified by the FDA and include:

- thiamin (vitamin B1, thiamin mononitrate, thiamin hydrochloride);
- riboflavin (vitamin B2);
- niacin (vitamin B3, niacinamide);
- folic acid (folate); and
- iron (reduced iron, ferrous sulfate).

To determine whether a product is enriched check the label for the term “enriched,” e.g., “enriched flour” or check the ingredient statement for the five enrichment nutrients above, e.g., “flour, niacin, ferrous sulfate, thiamine mononitrate, riboflavin, folic acid.” If the ingredient statement includes all five nutrients (iron, thiamin, riboflavin, niacin and folic acid), the product is enriched.

Not all refined products are enriched. For example, when corn is processed into cornmeal, the germ of the grain is removed. Unless the product indicates “enriched cornmeal” or the ingredient statement lists all five enrichment nutrients, the product is not enriched. For more information, see the CSDE’s handout, *Crediting Enriched Grains*.



STEP 3 – DETERMINE IF NONCREDITABLE GRAINS EXCEED LIMIT

Creditable grains include only whole and enriched meal/flour. If purchased grain products include any noncreditable grains they must be present at levels **less than two percent** of the product formula (or less than ¼ ounce equivalent). To meet this limit, the combined total of all noncreditable grains in a product cannot exceed:

- 3.99 grams for groups A-G (baked goods); or
- 6.99 grams for group H (cereal grains) and group I (ready-to-eat breakfast cereals).

If noncreditable grains exceed these amounts, the entire product is considered noncreditable.

The only exception is fortified breakfast cereals that contain a whole grain as the first ingredient. Fortified breakfast cereals contain five nutrients lost during the refining process (iron, thiamin, riboflavin, niacin and folic acid), as well as additional vitamins and minerals that do not exist naturally in grains. WGR fortified breakfast cereals are not required to limit the amount of noncreditable grains such as bran or germ. For more information, see the CSDE’s handout, *Crediting Breakfast Cereals*.

If a cereal bar is made with a fortified breakfast cereal, any noncreditable grains listed in the cereal component do **not** count toward the limit for noncreditable grains. Noncreditable grains are not limited for cereals that list a whole grain as the first ingredient and are fortified. For more information, see example 9 in “Sample Product Ingredient Statements” on page 9.

Noncreditable grains such as oat fiber, corn fiber, bran, germ, modified food starch, corn starch and wheat starch (including potato, legume, and other vegetable flours) do not contribute toward the grains component of the meal patterns. They cannot exceed the limit of 3.99 grams for groups A-G and 6.99 grams for groups H-I. The table below shows examples of noncreditable grain ingredients commonly found on product labels. If these ingredients are listed anywhere in the product’s ingredient statement, they **must** be included in the calculation of the product’s total noncreditable grain ingredients.

Examples of Noncreditable Grain Ingredients *		
• barley grits	• oat fiber	• rice flour (not enriched)
• bran	• malted barley flour (not enriched)	• rice starch
• corn bran	• modified food starch (including potato, legume and other vegetable flours)	• soluble corn fiber
• corn fiber	• modified corn starch	• soy fiber
• corn flour (not enriched)	• modified rice starch	• soy grits
• corn grits	• modified tapioca starch	• soy flour
• corn starch	• modified wheat starch	• tapioca starch
• cultured wheat starch	• potato flour	• wheat bran
• durum grits	• potato starch	• wheat germ
• fermented wheat		• wheat flour (not enriched)
• germ		• wheat starch
• hydrolyzed starch		

* These ingredients **must** be included in the calculation of noncreditable grain ingredients. This list is not inclusive of all possible noncreditable grain ingredients.

CRITERIA FOR WHOLE GRAIN-RICH FOODS, continued

Some ingredients are not creditable as grains but are **not** included in the calculation of a product's the total noncreditable grain ingredients. The table below shows examples of these ingredients. If these ingredients are listed anywhere in the product's ingredient statement, they can be disregarded.

Examples of Ingredients Not Counted When Calculating Noncreditable Grains *		
• cellulose fiber	• fibersol	• pea fiber
• chicory extract	• inulin	• powdered cellulose
• chicory root	• malt	• wheat gluten
• citrus fiber	• malt powder	
• corn dextrin	• maltodextrin	

* This list is not inclusive of all possible ingredients.

Determining the Amount of Noncreditable Grains

Sometimes a product's ingredient list will include noncreditable grain ingredients after the statement, "contains 2% or less." If one noncreditable grain is listed after this statement, the product complies with the limit for noncreditable grains. If this product also contains a whole grain as the first ingredient and all other grains are enriched, it meets the three WGR criteria and a PFS is not required.

Schools must obtain a PFS from the manufacturer to document the combined total weight (grams) of noncreditable grains if the product's ingredients list:

- does not include the "contains 2% or less" statement;
- lists more than one noncreditable grain after the "contains 2% or less" statement; or
- lists one or more noncreditable grains before the "contains 2% or less" statement.

For more information, see examples 3-6 in "Sample Product Ingredient Statements" on pages 7-8.

Noncreditable Grains in Combination Foods

Some products contain noncreditable grain ingredients as part of a non-grain component of the food, e.g., a whole-grain muffin (grain component) that contains apple filling (non-grain component) made with modified food starch. If the product's ingredient statement clearly indicates that noncreditable grain ingredients are **not** part of the product's grain component, the noncreditable grain ingredients do **not** count toward the limit for noncreditable grains. For more information, see example 6 in "Sample Product Ingredient Statements" on page 7.



EVALUATING PRODUCT FORMULATION STATEMENTS FOR GRAINS

Schools will often need to obtain a PFS from the manufacturer to document that a product meets the three WGR criteria, especially the amount of noncreditable grains. The manufacturer's PFS must include the same information listed on the USDA's [PFS for Grains](#). It must also be on company letterhead, and signed and dated by an official company representative. If the manufacturer's PFS does not meet these requirements, it cannot be accepted.

The CSDE has observed several common compliance issues with PFS for grain products. The following guidance helps schools avoid these issues.

- If the manufacturer uses a different PFS format than the USDA's PFS for Grains, check to be sure that the manufacturer's PFS includes the same information listed on the USDA form.
- Check to be sure that the PFS is on company letterhead, and is signed and dated by an official company representative.
- Read the product's ingredient statement to determine whether it contains any noncreditable grains. Compare this information with the PFS. If the product's ingredient statement includes any noncreditable grains, the PFS must indicate the total combined weight (grams) per serving. Sometimes the product's ingredient statement lists noncreditable grains but the PFS incorrectly indicates that the product does not contain any noncreditable grains.
- If the PFS indicates the amount of noncreditable grains and the product's ingredient statement contains **more than one** noncreditable grain, confirm with the manufacturer that the amount of noncreditable grains indicated on the PFS includes the **combined total weight** of all noncreditable grains listed in the product's ingredient statement. For example, if the PFS states that a product contains 0.89 grams of noncreditable grains and the product's ingredients include oat bran, modified corn starch, wheat flour and corn meal, verify that the 0.89 grams includes all four noncreditable grains.

It is important to note that a PFS does not provide any warranty against audit claims for reimbursable school meals. **Any crediting information received from a manufacturer other than a valid Child Nutrition (CN) label should be checked for accuracy prior to the item being included in the reimbursable meal.** For more information, see the CSDE's handout, [Product Formulation Statements](#).



CRITERIA FOR WHOLE GRAIN-RICH FOODS, continued

SAMPLE PRODUCT INGREDIENT STATEMENTS

To be WGR, a product must contain at least 50 percent whole grains, any remaining grain ingredients must be enriched and any noncreditable grains must be no more than 3.99 grams for groups A-G and 6.99 grams for groups H-I. The following examples demonstrate how to evaluate a product’s ingredient statement for compliance with the three WGR criteria. For each example, the **creditable grains are indicated in green** and the **noncreditable grains are indicated in red**.

- To credit as the grains component in the NSLP and SBP, a product must meet the three WGR criteria.
- To meet the Connecticut Nutrition Standards and be allowed for a la carte sales, a product must meet the three WGR criteria and must also meet the required nutrient standards for the specific food category. For more information, see the CSDE’s [Connecticut Nutrition Standards Web page](#).

Grain products that meet the above criteria are listed on the CSDE’s [List of Acceptable Foods and Beverages](#).

Ingredient Statement	Meets WGR Requirements?
<p>Example 1 – English Muffin Water, whole wheat flour, enriched flour (wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid), yeast, wheat gluten, contains less than 2% of each of the following: soybean oil, sugar, salt, calcium propionate (perservative), fumaric acid, baking soda, monocalcium phosphate, calcium sulfate, ammonium sulfate.</p>	<p>Yes: Whole wheat flour is the first grain ingredient and the second grain ingredient is enriched flour. (A whole grain must be the first ingredient listed with an exception for water). The product does not contain any noncreditable grains. A PFS is not required because this product meets the three WGR criteria.</p>
<p>Example 2 – Apple Oatmeal Bar Enriched wheat flour (bleached flour, niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid), sugar, oatmeal, high fructose corn syrup, whole wheat flour, corn syrup, palm oil, raisin paste, canola oil, applesauce (apples, ascorbic acid), eggs, soy lecithin, molasses, cinnamon, natural flavors contains milk), salt, baking soda, egg whites, sodium ascorbate (vitamin C).</p>	<p>More Information Needed: The product does not contain any noncreditable grains. Enriched flour is the first ingredient but the product also contains two whole grains (oatmeal and whole wheat flour).</p> <p>A PFS is required to provide more information. If the combined weight of the oatmeal and the whole wheat flour is more than the weight of the enriched wheat flour, the product contains at least 50 percent whole grains and meets the three WGR criteria.</p>
<p>Example 3 – Whole-wheat Bagel Whole wheat flour, sugar, wheat gluten. Contains 2% or less of each of the following: honey, salt, yellow corn flour, yeast, molasses, diacetyl tartaric acid esters of mono-diglycerides (datem), ascorbic acid, mono- and diglycerides, l-cysteine, enzymes.</p>	<p>Yes: Whole wheat flour is the first and only creditable grain ingredient. This product contains one source of noncreditable grains (yellow corn flour), listed after the statement “contains 2% or less of.” If one noncreditable grain is listed after this statement, the product complies with the limit for noncreditable grains. A PFS is not required because this product meets the three WGR criteria.</p>
<p>Example 4 – Whole-grain Bagel Whole wheat flour, enriched bromated wheat flour (niacin [a-B vitamin], thiamine mono nitrate [vitamin B-1], ferrous sulfate [iron], potassium bromate, riboflavin [vitamin B-2], and folic acid), water, brown sugar granulated sugar. Contains 2% or less of the following ingredients: salt, vital wheat gluten, mono & diglycerides, honey, corn meal, calcium propionate, malted barley flour, molasses powder (molasses, wheat starch), ammonium chloride, ascorbic acid (vitamin C), l-cysteine hydrochloride, azodicarbonamide (ADA), calcium sulfate, enzymes.</p>	<p>More Information Needed: Whole wheat flour is the first ingredient and enriched bleached flour is the second ingredient. The product contains three sources of noncreditable grains (corn meal, barley flour and wheat starch), listed after the statement “contains 2% or less of the following ingredients.”</p> <p>A PFS is required to provide more information. If the PFS for this product documents that the combined weight of all three noncreditable grains is less than 3.99 grams, the product meets the three WGR criteria.</p>

CRITERIA FOR WHOLE GRAIN-RICH FOODS, continued

Ingredients Statement	Meets WGR Requirements?
<p>Example 5 – Cheese Tortilla Chips Whole corn, vegetable oil (contains one or more of the following: corn, soybean, and/or sunflower oil), salt, cheddar cheese (milk, cheese cultures, salt, enzymes), corn dextrin, whey, corn maltodextrin, monosodium glutamate, tomato powder, buttermilk, romano cheese (part-skim cow's milk, cheese cultures, salt, enzymes), whey protein concentrate, onion powder, corn flour, disodium phosphate, natural and artificial flavor, dextrose, lactose, spices, artificial color (including yellow 6, yellow 5, red 40), lactic acid, citric acid, sugar, garlic powder, red and green bell pepper powder, nonfat milk, disodium inosinate, and disodium guanylate</p>	<p>More Information Needed: Whole corn is the first and only creditable grain ingredient. This product contains one source of noncreditable grains (corn flour).</p> <p>A PFS is required to provide more information. If the PFS for this product documents that the corn flour weigh less than 3.99 grams, the product meets the three WGR criteria.</p>
<p>Example 6 – Apple Cinnamon Muffin Whole wheat flour, sugar, eggs, water, enriched flour (wheat flour, malted barley flour, niacin, reduced iron, thiamin mononitrate, riboflavin, folic acid), invert sugar, apples, soybean oil, contains 2% or less of: palm oil, canola oil, propylene glycol mono- and diesters of fats and fatty acids, wheat gluten, oat fiber, leavening (baking soda, sodium aluminum phosphate, monocalcium phosphate), mono- and diglycerides, modified food starch, cinnamon, potassium sorbate (preservative), sodium alginate, salt, soy lecithin, natural flavor, sodium stearoyl lactylate, caramel color, wheat starch, enzymes.</p>	<p>More Information Needed: Whole wheat flour is the first ingredient and the only other creditable grain ingredient is enriched flour. This product contains three sources of noncreditable grains (oat fiber, modified food starch and wheat starch), listed after the statement “contains 2% or less of.”</p> <p>A PFS is required to provide more information. If the PFS for this product documents that the combined weight of all three noncreditable grains is less than 3.99 grams, the product meets the three WGR criteria.</p>
<p>Example 7 – Apple-filled Bread Stick Crust: flour blend [whole-wheat flour, enriched flour (wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, enzyme, folic acid)], water, brown sugar, corn oil, dough conditioner (soybean oil, vegetable glycerides, soy flakes), yeast, salt, wheat gluten, enzyme. Apple filling: water, corn syrup, evaporated apples (treated with sulfur dioxide to retain color), sugar, modified food starch, apple juice concentrate, citric acid, spices, salt, potassium sorbate, and sodium benzoate (to preserve freshness). Topping: [natural oil blend (soybean, palm fruit and canola oils) water, salt, mono and diglycerides, potassium sorbate, natural and artificial butter flavor, lactic acid, vitamin a palmitate and beta carotene.] Tapioca dextrin topping: (water, tapioca dextrin), sugar, cinnamon.</p>	<p>More Information Needed: This product contains apple filling and topping (non-grain components) in addition to the crust (grain component).</p> <p>The crust ingredients are highlighted in yellow. Whole wheat flour is the first ingredient and enriched flour is the second ingredient. The crust contains one source of noncreditable grains (soy flakes).</p> <p>A PFS is required to provide more information. If the PFS for this product documents that the soy flakes weigh less than 3.99 grams, the product meets the three WGR criteria.</p> <p>The modified corn starch in the apple filling does not count toward the limit for noncreditable grains because it is part of the apple filling and not the crust. If the product's ingredient statement clearly indicates that noncreditable grain ingredients are not part of the product's grain component, they do not count toward the limit for noncreditable grains.</p>

CRITERIA FOR WHOLE GRAIN-RICH FOODS, continued

Ingredients Statement	Meets WGR Requirements?
<p>Example 8 – Chicken Vegetable Egg Roll Filling: cabbage, ground chicken, carrots, textured soy protein (textured soy flour, zinc oxide, niacinamide, ferrous sulfate, copper gluconate, vitamin a palmitate, calcium pantothenate, thiamine mononitrate [B1], pyridoxine hydrochloride [B6], riboflavin [B2], cyanocobalamin [B12]), celery, water, onion, contains 2% or less of: dried whole egg, whey protein concentrate, flavor (autolyzed yeast extract, salt, dextrose, natural flavor), sugar, soy sauce powder (soy sauce [wheat, soybeans, salt], maltodextrin, salt), modified food starch, dehydrated onions, sea salt, garlic, spice; Wrapper: white whole wheat flour, water, enriched flour (wheat flour [niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid], malted barley flour), enriched durum flour (wheat flour, niacin, ferrous sulfate, thiamine mononitrate, riboflavin, folic acid), contains 2% or less of: wheat gluten, vegetable oil (soybean, cottonseed, corn, and/or canola oil), flavor (autolyzed yeast extract, salt, dextrose, natural flavor), dried whole egg, salt, rice extract, ascorbic acid, cornstarch; water. Fried in vegetable oil (soybean, cottonseed, corn, and/or canola oil).</p>	<p>Yes: This is a combination food that contains a filling made from vegetables and chicken (vegetables and meat/meat alternates components), in addition to the egg roll wrapper (grains component).</p> <p>The wrapper ingredients are highlighted in yellow. White whole wheat flour is the first ingredient of the wrapper and the only other creditable grain ingredient is enriched flour. The wrapper also contains one source of noncreditable grains (cornstarch), listed after the statement “contains 2% or less of.” If one noncreditable grain is listed after this statement, the product complies with the limit for noncreditable grains. A PFS is not required because this product meets the three WGR criteria.</p> <p>The wheat and modified corn starch in the vegetable and chicken filling does not count toward the limit for noncreditable grains because it is part of the filling and not the egg roll wrapper. If the product’s ingredient statement clearly indicates that noncreditable grain ingredients are not part of the product’s grain component, they do not count toward the limit for noncreditable grains.</p> <p>Meal Pattern Crediting of Non-grain Components: If crediting the vegetables or chicken toward the meal pattern components, a PFS for vegetables and meat/meat alternates is required to document the amount of each ingredient per serving.</p> <p>Competitive Foods Standards: To meet the requirements for a combination food under the Connecticut Nutrition Standards, the product must also contain at least ¼ cup of vegetables. For more information, see the CSDE’s Connecticut Nutrition Standards Web page.</p>
<p>Example 9 – Cereal Bar Whole Grain Oats, Cereal (whole grain wheat, sugar, corn meal, brown sugar syrup, canola and/or rice bran oil, dextrose, baking soda, salt, calcium carbonate, trisodium phosphate, zinc and iron [mineral nutrients], vitamin C [sodium ascorbate], a B vitamin [niacinamide], artificial flavor, vitamin B6 [pyridoxine hydrochloride], vitamin B2 [riboflavin], vitamin b1 [thiamin mononitrate], vitamin a [palmitate], a B vitamin [folic acid], vitamin B12, vitamin D, BHT added to retain freshness), corn syrup , sugar, rice bran and/or canola oil , fructose, brown rice flour, marshmallows (sugar, dextrose, modified corn starch, corn syrup, cocoa, gelatin, natural and artificial flavor), chicory root extract, maltodextrin. Contains 2% or less of: whole corn flour, glycerin, calcium carbonate, whole grain oat flour, wheat starch, modified wheat starch, cocoa processed with alkali, salt, gelatin, color added, natural and artificial flavor, BHT added to retain freshness.</p>	<p>More Information Needed: Whole grain oats are the first ingredient and the second ingredient is a whole-grain fortified cereal. The cereal ingredients are highlighted in yellow. The corn meal in the cereal does not count toward the limit for noncreditable grains because the cereal has a whole grain as the first ingredient and is fortified. WGR fortified breakfast cereals are not required to limit the amount of noncreditable grains.</p> <p>The marshmallow ingredients are highlighted in orange. The modified corn starch in the marshmallows does not count toward the limit for noncreditable grains because it is part of the marshmallows and not the cereal. If the product’s ingredient statement clearly indicates that noncreditable grain ingredients are not part of the product’s grain component, they do not count toward the limit for noncreditable grains.</p> <p>This product contains two sources of noncreditable grains (wheat starch and modified food starch) listed after the statement “contains 2% or less of.” A PFS is required to provide more information. If the PFS for this product documents that the combined weight of both noncreditable grains is less than 3.99 grams, the product meets the three WGR criteria.</p>

CRITERIA FOR WHOLE GRAIN-RICH FOODS, continued

Resources

Calculation Methods for Crediting Grains:

http://www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/nslp/crediting/grain_calculations.pdf

Child Nutrition (CN) Labeling:

http://www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/nslp/crediting/CN_labeling.pdf

Crediting Enriched Grains:

<http://www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/nslp/crediting/EnrichedGrains.pdf>

Crediting Foods (CSDE Web Page):

<http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=333796>

Food Buying Guide for Child Nutrition Programs:

<http://www.fns.usda.gov/tn/resources/foodbuyingguide.html>

Identifying Whole Grains:

<http://www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/nslp/crediting/IdentifyingWG.pdf>

Meal Patterns (CSDE Web Page):

<http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=333770>

Menu Planning (CSDE Web Page): <http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=333780>

Menu Planning Guide for School Meals: <http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=334320>

Product Formulation Statements:

<http://www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/nslp/crediting/PFS.pdf>

Sample Product Formulation Statement for Documenting Grains in School Meals Required Beginning SY 2013-2014:

<http://www.fns.usda.gov/sites/default/files/PFSgrains13-14.pdf>

Summary of Connecticut Nutrition Standards:

<http://www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/hfc/summarycns2014.pdf>

Whole Grain-rich Ounce Equivalents Requirements for School Nutrition Programs:

http://www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/nslp/grains_ounce_equivalents_snp.pdf



For more information, see the Connecticut State Department of Education's (CSDE) [Menu Planning Guide for School Meals](#) and [Meal Patterns](#) and [Crediting Foods](#) Web pages or contact the [school nutrition programs](#) staff in the CSDE Bureau of Health/Nutrition, Family Services and Adult Education, 25 Industrial Park Road, Middletown, CT 06457.

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