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

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

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

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

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



STEP 1 Find the ingredient list



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

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

The ingredient list shown here is for a frozen **cheese pizza**.

Because pizza is a combination food, the ingredients for all the foods within the cheese pizza, such as the crust, cheese, and sauce, are listed within one

as the crust, cheese, and sauce, are listed within one ingredient list. In this example, you would look at the ingredients for the crust, to determine if the grain component of this food is whole grain-rich.

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

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

^{*}During the COVID-19 public health emergency, some State agencies may have opted into School Year 2021-2022 meal pattern waivers. Additional information on these waivers is available at: fns.usda.gov/disaster/pandemic/cn-2021-22-waivers-and-flexibilities.



STEP 2 Simplify the ingredient list

Look at the "Disregarded Ingredients" list below. Do not consider these ingredients. Some sound like grains, so it can be helpful to cross them out at the beginning.

Disregarded Ingredients:

- Cellulose fiber
- Corn dextrin
- Corn starch
- Modified food starch
- Rice starch
- Tapioca starch
- Water
- Wheat dextrin

- Wheat gluten
- · Wheat starch
- Any ingredients that appear after the phrase, "Contains 2% or less of..." or "Contains less than 2% of..."

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

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

STEP 3 Look at the first ingredient

If you have a combination food, like a pizza, look at the part of the ingredient list that refers to the grain product. For this food, the grain product is the pizza crust.

Is the first ingredient a whole-grain ingredient?

YES ✓

If the first ingredient is whole-grain and the food is not a ready-to-eat breakfast cereal, **go to Step 4 on page 3**.



If the first ingredient is whole-grain and the food is a ready-to-eat breakfast cereal, see "Identifying Whole Grain-Rich Breakfast Cereals in the CACFP" on page 7.

INGREDIENTS: Crust: Whole-wheat flour,

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

The first grain ingredient is "whole-wheat flour," which is a whole-grain ingredient.



If the first ingredient is not a whole-grain ingredient, then this food is not creditable as a whole grain-rich food in the CACFP using the *Rule of Three*.*



It is possible that the food includes several whole-grain ingredients. When added together, these grains may meet the whole grain-rich requirement. In this case, you would need to request additional information from the manufacturer.



See the Whole-Grain Ingredients chart on page 5 for some common whole grains. Make sure the first grain ingredient is not listed on the Enriched Grain Ingredients, Bran or Germ Ingredients, or Non-Creditable Grains or Flours charts on page 6.



^{*}This food might be creditable as a grain that is not being served as a whole grain-rich food. See the Food Buying Guide for Child Nutrition Programs (https://foodbuyingguide.fns.usda.gov) for information on how to determine if an enriched grain is creditable towards the grain component in the CACFP.

STEP 4 Look for the second grain ingredient

Does the food have another grain ingredient?

NO X

If the food does not have any other grain ingredients, you can **stop here**. The food is whole grain-rich!

YES ✓

If so, is the second grain ingredient whole-grain, enriched, or bran or germ? Make sure the second grain ingredient is not listed on the "Non-Creditable Grains or Flours" chart.

YES ✓

If the second grain ingredient is whole-grain, enriched, or bran or germ, **go to Step 5 below**.

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

▲ The second grain ingredient is "enriched wheat flour," which is an enriched grain ingredient. For information on flour made from more than one grain ingredient, see "Focus on Flour Blends" on page 4.

NO X

If the second grain ingredient is **not** whole-grain, enriched, or bran or germ, then this food is not creditable as a whole grain-rich food in the CACFP using the *Rule of Three*.*

STEP 5 Look for the third grain ingredient

Does the food have a third grain ingredient?

NO X

If the food does not have any other grain ingredients, you can **stop here**. The food is whole grain-rich!

YES ✓

If so, is the third grain ingredient whole-grain, enriched, or bran or germ? Make sure the third grain ingredient is not listed on the "Non-Creditable Grains or Flours" chart.

YES ✓

If the third grain ingredient is whole-grain, enriched, or bran or germ, then this food is whole grain-rich! If your product has other grain ingredients, such as a fourth grain ingredient, you do not need to consider them.

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

- The third grain ingredient is "wheat bran," which is a type of bran.
- ✓ This pizza crust is considered whole grain-rich because the first ingredient is whole-grain, the second grain ingredient is enriched, and the third ingredient is a type of bran.

NO X

If the third grain ingredient is not whole-grain, enriched, bran, or germ, then this food is not creditable as a whole grain-rich food in the CACFP using the *Rule of Three*.*

Focus on Flour Blends

You may see an ingredient list that includes a flour blend as an ingredient. The flour blend will be followed by a list of sub-ingredients that make up the flour blend. These sub-ingredients are shown in parenthesis. Treat these flour blends as one grain ingredient when applying the *Rule of Three*.

Find the first ingredient on the ingredient list.

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

▲ This is an ingredient list for bread. This bread includes two flour blends: whole grain flour and a flour blend.

The list of sub-ingredients in parenthesis tells you what grains are in the whole grain flour and the flour blend.

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

The whole grain flour is the first ingredient on this ingredient list.

If the first ingredient is a flour blend, all the ingredients in the flour blend must be whole-grain.

You can now proceed with examining the second and third grain ingredients as described on pages 2 and 3.

If the flour blend is the second or third grain ingredient, then the flour blend may be made up of whole grains, enriched grains, bran, and/or germ.



If the flour blend includes any non-creditable flours or grains, then the flour blend is not a creditable grain ingredient. **INGREDIENTS:** Whole grain flour (whole-wheat flour, brown rice flour, whole grain oat flour), water, flour blend (graham flour, enriched wheat flour, enriched corn flour, wheat bran), yeast, salt.

▲ The ingredients in the whole grain flour are whole-wheat flour, brown rice flour, and whole grain oat flour.

All the ingredients in the whole grain flour are whole-grain, so the whole grain flour is considered whole grain-rich.

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

▲ The second grain ingredient in this bread is the flour blend.

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

▲ The flour blend contains whole-grain ingredients (graham flour), enriched ingredients (enriched wheat flour, enriched corn flour) and bran (wheat bran).

This bread does not have a third grain ingredient.

✓ This bread is considered whole grain-rich because the first ingredient is whole-grain and the second grain ingredient is made from whole-grain, enriched, and bran ingredients.

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

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

Whole-Grain Ingredients

- Amaranth
- · Amaranth flour
- · Brown rice
- · Brown rice flour
- Buckwheat
- Buckwheat flour
- Buckwheat groats
- Bulgur
- Corn masa
- · Corn treated with lime
- · Cracked wheat
- Crushed wheat
- Dehulled barley
- Dehulled-barley flour
- Entire wheat flour
- Flaked rye
- Flaked wheat
- Graham flour
- Hominy
- Hominy grits
- Instant oatmeal
- · Masa harina
- Millet

- · Millet flour
- Nixtamalized corn flour/meal
- · Oat groats
- Oats/oatmeal
- · Old fashioned oats
- Popcorn
- Quick cooking oats
- Quinoa
- Rye berries
- Rye groats
- Sorghum
- Sorghum flour
- · Spelt berries
- Sprouted brown rice
- Sprouted buckwheat
- · Sprouted einkorn
- · Sprouted spelt
- Sprouted wheat
- Sprouted whole rye
- Sprouted whole wheat
- Steel cut oats
- Teff

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

- Teff flour
- Triticale
- Triticale flour
- · Wheat berries
- Wheat groats
- · White whole wheat flour
- Whole corn
- · Whole durum flour
- · Whole grain corn
- Whole grain corn flour
- · Whole grain oat flour
- Whole grain spelt flour
- Whole grain wheat
- Whole grain wheat flakes
- · Whole grain wheat flour
- · Whole rye flour
- · Whole wheat flour
- Wild rice
- · Wild rice flour

Enriched Grain Ingredients

- Enriched bromated flour
- · Enriched corn flour
- Enriched durum flour
- Enriched durum wheat flour
- Enriched farina
- · Enriched grits
- Enriched rice

- · Enriched rice flour
- · Enriched rye flour
- Enriched wheat flour
- · Enriched white flour
- Other grains with the word "enriched" in front of it.



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

Bran or Germ Ingredients

Corn bran

- Rice bran

Oat bran

Rye bran

Wheat branWheat germ

Non-Creditable Grains or Flours

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

- · Barley malt
- Bean or legume flour (such as soy, chickpea, lentil, etc.)
- · Bromated flour
- Corn
- Corn fiber
- Degermed corn
- Degerminated corn meal

- Durum flour
- Farina
- Grits
- Malted barley flour
- Nut or seed flour (any kind)
- Oat fiber
- Potato flour
- · Rice flour

- Semolina
- · Stone ground corn
- Tapioca flour
- Vegetable flour (any kind)
- · Wheat flour
- · White flour
- Yellow corn flour
- Yellow corn meal

Identifying Whole Grain-Rich Breakfast Cereals in the CACFP



For ready-to-eat breakfast cereals only, if the first ingredient is whole-grain, and the cereal is fortified, then the cereal is whole grain-rich in the CACFP.

Remember to check that the cereal also meets the CACFP sugar limit. For more information on sugar limits for cereal, see "Choose Breakfast Cereals That Are Lower in Sugar" at https://www.fns.usda.gov/tn/meal-pattern-training-worksheets-cacfp.

To determine if a ready-to-eat cereal is whole grain-rich:

STEP 1 Look at the first ingredient

Is the first ingredient a whole-grain ingredient?



If the first ingredient is whole-grain, go to Step 2.



If the first ingredient is not a whole grain, then this food is not creditable as a whole-grain-rich food in the CACFP using the *Rule of Three*.*

Example 1

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

- ▲ 1. The first ingredient is "whole grain oat flour," which is a whole-grain ingredient.
 - 2. The presence of "Vitamins and Minerals" on the ingredient list indicates that this cereal is fortified.
- ✓ This breakfast cereal is whole grain-rich because the first ingredient is whole-grain and the cereal is fortified.

STEP 2 Look for fortification

Is the cereal fortified?

Look for the words "fortified" on the food package. You can also look at the ingredient list to see if it lists any vitamins and minerals that have been added to the product. Cereals that are not fortified would not have any added vitamins and minerals.



If the cereal is fortified, then this food is whole grain-rich! If your cereal has other grain ingredients, you do not need to consider them. See **Example 1**.



If the cereal has a whole grain as the first ingredient, but is not fortified, then follow the *Rule of Three* instructions on pages 1-3 to look at the second and third grain ingredients. See **Example 2**.

Example 2

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

- 1. The first ingredient is "whole grain wheat," which is a whole-grain ingredient.
 - 2. This food is not fortified. There are no vitamins and minerals on the ingredient list. Look at the second and third grain ingredients to see if the cereal is whole grain-rich.
 - 3. The second grain ingredient is **wheat bran**, which is a type of **bran**.
 - 4. The third grain ingredient is **oat fiber**, which is a **non-creditable ingredient**.
- This breakfast cereal is not whole grain-rich using the Rule of Three because the third grain ingredient is a non-creditable ingredient.

Try It Out!

Look at the ingredient lists for the grain items below. Use the *Rule of Three* to determine if these items are whole grain-rich. Why or why not?

A	Crackers: Yes No Why or why not?	INGREDIENTS: Whole grain wheat flour, vegetable oil, enriched rye flour, cracked wheat.
В	Bread: Yes No Why or why not?	INGREDIENTS: Flour blend (enriched flour, brown rice flour, whole grain oat flour), water, whole grain flour blend (graham flour, whole grain corn flour), wheat bran, yeast, salt.
CEREAL	Ready-to-Eat Cereal: ☐ Yes ☐ No Why or why not?	INGREDIENTS: Whole grain corn, corn meal, sugar, corn bran, salt, brown sugar syrup. Vitamins and Minerals: calcium carbonate, iron, zinc, vitamin C, vitamin B6, vitamin B2, vitamin A, vitamin B12.

- 2. The presence of "Vitamins and Minerals" on the ingredient list indicates that this cereal is fortified.
 - 1. The first ingredient is whole grain corn, which is a whole-grain ingredient.
 - Yes, this ready-to-eat cereal is whole grain-rich.

1. The first ingredient in this bread is a flour blend that contains enriched flour. If the first ingredient is a flour blend, all the grain ingredients in the flour blend must be whole-grain. Enriched flour is not a whole-grain ingredient.

- No, the bread is not whole grain-rich.
- 3. The third grain ingredient is cracked wheat, which is a whole-grain ingredient.
- 2. The second grain ingredient is enriched tye flour, which is an enriched ingredient.
- 1. The first grain ingredient is whole grain wheat flour, which is a whole-grain ingredient.
 - Yes, these crackers are whole grain-rich.



Answer Key: