



State of Arizona
Department of Education



Health and Nutrition Services Division

HNS #27-2018

MEMORANDUM

To: Child and Adult Care Food Program (CACFP) Sponsors

From: Melissa Conner, Associate Superintendent
Arizona Department of Education, Health & Nutrition Services Division

Original Signed

Erin Raczynski, Co-Director
Community Nutrition Programs

Date: July 20, 2018

RE: Updated HNS Response to New Meal Pattern Recordkeeping Requirements

The new CACFP meal pattern went into effect on October 1, 2017. Per [CACFP 17-2017](#) and [CACFP 01-2018](#), State agencies must determine acceptable recordkeeping documents required to demonstrate compliance with the meal pattern. This memorandum is an updated version of HNS Memo #04-2018 to include updated guidance from [CACFP 09-2018](#), released by USDA in April 2018. It explains how the Arizona Department of Education (ADE) will review meal pattern compliance and the supporting documentation that is required to be maintained onsite.

Best practice is to keep required supporting documentation onsite, otherwise it must be immediately accessible from the sponsor's food service vendor, if applicable. Keep this documentation in a binder with menus or with recipes for easy reference. You may make photocopies or cut from actual packaging. ADE staff will review the records of nutrition information for whole grain rich foods, breakfast cereals and yogurts when reviewing CACFP sponsors and sites.

Recordkeeping Requirements for Whole Grain-Rich Foods

Per [CACFP 01-2018](#), at least one grain per day must be whole grain-rich. The supporting documentation must include the product label along with the information used to determine that the food is whole grain-rich. This information varies based on which of the six methods is used and must include at least one of the following:

1. "Whole *Wheat*" statement on the label* (bread and pasta products only),
2. Any State agency's WIC-approved whole grain food list,
3. Label that includes one of the FDA whole grain health claims,
4. Ingredients List,

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5. One or more acceptable forms of Whole Grain-Rich documentation for the National School Lunch Program; or
6. Manufacturer Documentation or Standardized Recipe

*Note: A “Whole Grain” package statement does not provide sufficient evidence of meeting the whole grain rich requirement.

If you are not sure whether a product is whole grain-rich, we recommend the following resources:

- [Identifying Whole Grain-Rich](#) from the National CACFP Sponsors Association.
- [CACFP 01-2018 Grain Requirements in the Child and Adult Care Food Program: Questions and Answers](#) from USDA.
- [List of Whole Wheat Products \(Spanish\)](#) from ADE.

Recordkeeping Requirements for Breakfast Cereals

Per [CACFP 08-2017](#), breakfast cereals must contain no more than 6 grams of sugar per dry ounce. The supporting documentation must include the product label, nutrition facts label and ingredients list.

If you are not sure whether a product meets the new meal pattern requirement for breakfast cereals, we recommend the following resources:

- [Choose Breakfast Cereals That Are Lower in Added Sugars](#) from USDA.
- [CACFP 08-2017 Questions and Answers on the Updated Meal Pattern Requirements for the Child and Adult Care Food Program](#) from USDA.
- [Creditable Yogurts and Cereals List \(Spanish\)](#) from ADE.

Recordkeeping Requirements for Yogurts

Per [CACFP 08-2017](#), yogurts must contain no more than 23 grams of sugar per 6 oz. The supporting documentation must include the product label and nutrition facts label.

If you are not sure whether a product meets the new meal pattern requirement for yogurts, we recommend the following resources:

- [Choose Yogurts That Are Lower in Added Sugars](#) from USDA.
- [CACFP 08-2017 Questions and Answers on the Updated Meal Pattern Requirements for the Child and Adult Care Food Program](#) from USDA.
- [Creditable Yogurts and Cereals List \(Spanish\)](#) from ADE.
- [Yogurt Sugar Limits Chart](#) from ADE.

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Reminder of Recordkeeping Requirements for Mixed Foods with CN Labels

There is no change to the recordkeeping requirement for products with CN Labels. Sponsors must keep the product label and CN label.

Summary of Recordkeeping Requirements

Sponsors must provide documentation that shows the nutrient content for meal pattern requirements and allow reviewers to clearly identify how each label connects to foods being served. You may make photocopies or cut from actual packaging.

Meal Pattern Recordkeeping	
Food Items	Recordkeeping Required
Whole Grain-Rich Foods	Product Label and at least one of the following: <ul style="list-style-type: none"> • “Whole Wheat” statement on the label* (<i>bread and pasta products only</i>) • Any State agency’s WIC-approved whole grain food list • Label that includes one of the FDA-approved Health Statements • Ingredients List • One or more acceptable forms of Whole Grain-Rich documentation for the National School Lunch Program; • Manufacturer Documentation or Standardized Recipe
Breakfast Cereals	All of the following: <ul style="list-style-type: none"> • Product Label • Nutrition Facts Label • Ingredients List
Yogurts	Both of the following: <ul style="list-style-type: none"> • Product Label • Nutrition Facts Label
Products with Child Nutrition (CN) Labels	Both of the following: <ul style="list-style-type: none"> • Product Label • CN Label

*Note: A “Whole Grain” package statement does not provide sufficient evidence of meeting the whole grain-rich requirement.

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All sponsors must follow the new meal pattern. Sponsors and sites are responsible for contacting ADE with any questions or concerns during this transition year. Sponsors are encouraged to contact their CACFP Specialist with specific questions and should take advantage of the multiple training and technical assistance opportunities that are being offered and provided.

Contact Information

If you have questions or concerns regarding this memo, please contact ADE at (602) 542-8700 and choose Option 1 for Community Nutrition Programs.

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