

Date: June 2018  
To: School Food Service Directors  
From: Christine Emerson, Director  
School Nutrition Programs  
Subject: SY 2018-19 Whole Grain-Rich Policy Clarification

CFR 210.10 (c) (2) states that “Beginning July 1, 2014 (SY 2014-2015), all grains must be whole grain-rich” and [SP 10-2012 \(v9\)](#) states the following:

- “All grains equal to or greater than 0.25 oz eq (including battered and/or breaded products) must be counted towards the weekly grains requirement” and
- “All grains offered must be whole grain-rich in order to credit towards the grain component.”

Based on the above statements, when planning menus in Montana, grains less than 0.25 oz eq are not counted towards the grains requirement and therefore do not need to be whole grain-rich. Grains equal to or greater than 0.25 oz eq must be counted towards the grain component, therefore must be whole grain-rich. The following questions and answers demonstrate how this looks when planning menus:

**1. I offer enriched soda/saltine crackers with soup, but I always pair the soup with a whole grain-rich dinner roll. Do the crackers need to be whole grain-rich?**

Enriched soda/saltine crackers are allowable when paired with at least 1 oz eq of whole grain-rich grain. This is because the menu planner intends for students to take less than 0.25 oz eq of grain from the crackers, and the roll is the planned grain component.

**2. When do crackers need to be whole grain-rich?**

Crackers must be whole grain-rich if the crackers are intended to meet the grain component. This is because a quantity is being offered that is equal to or greater than 0.25 oz eq of grain.

**3. I make a pumpkin pie every year for the holidays, does the crust have to be whole grain-rich?**

This depends on the recipe. If the pie crust provides less than 0.25 oz eq of grain per serving, then it does not have to be whole grain-rich. Check your recipe to see how many oz eq of grain per serving is offered. To figure this out, convert the measurement of grains to grams per serving, then divide the grams per serving by 16 grams. For example, a recipe that provides 8 grams of grain per serving, equals 0.5 oz eq of grain per serving.

**4. Do chow mein noodles sprinkled on a dish or croutons on a salad bar or sprinkled on a salad need to be whole grain-rich?**

In this manner, they are used as a garnish so are likely not offered in quantities great enough to count towards the grain component. If, however, the menu planner intends for the chow mein noodles or croutons to meet the grain component and are offering a quantity that is equal to or greater than 0.25 oz eq, they must be whole grain-rich.

Additional resources are available at <https://www.fns.usda.gov/healthierschoolday/tools-schools-serving-whole-grain-rich>. If you have questions, please contact School Nutrition Programs at 406-444-2501.