



Date: November 7, 2024

Memo code: SP 05-2025, CACFP 04-2025, SFSP 02-2025

Subject: Guidance for Accepting Processed Product Documentation for Meal Pattern Requirements

To: Regional Directors, Child Nutrition Programs, All Regions
State Directors, Child Nutrition Programs, All States

The purpose of this memorandum is to provide State agencies and program operators of the Child Nutrition Programs (CNP), including the National School Lunch Program, School Breakfast Program, Child and Adult Care Food Program, and the Summer Food Service Program, with additional information and clarification on the State agency monitoring process regarding the: 1) Child Nutrition (CN) label, 2) Watermarked CN label, and 3) manufacturer's Product Formulation Statement (PFS). This memorandum also reflects updates to the CN Label Verification System and provides clarification on the date of authorization found on the CN label versus the "Valid Until" date on the CN Label Verification Report. This memorandum supersedes:

- SP11 CACFP10 SFSP13-2015v2: *CN Labels Copied with a Watermark Acceptable Documentation*, issued March 11, 2015;
- SP27 CACFP 09 SFSP 12-2015: *Administrative Review Process Regarding CN Label, Watermarked CN Label and Manufacturer's Product Formulation Statement*, issued March 11, 2015; and
- TA 07-2010 (v3): *Guidance for Accepting Processed Product Documentation for Meal Pattern Requirements*, issued November 26, 2014.

Program operators are ultimately responsible if a menu does not fulfill meal pattern requirements; therefore, they must maintain documentation that demonstrates how a food item meets the requirements of program regulations in [7 CFR 210, 220, 225](#) and [226](#). If the

processed (commercially purchased) food item is not found in the “Food Buying Guide for Child Nutrition Programs” (FBG), then documentation should be obtained from the manufacturer prior to purchasing and serving/claiming the food item. The CN label and a manufacturer’s PFS are documents that provide a way for a manufacturer to demonstrate how a processed food product contributes to the meal pattern requirements. Both a CN label and PFS are voluntarily provided by manufacturers at the request of program operators.

A CN label is authorized by USDA and provides a warranty of a product’s meal pattern contribution when the processed product is used according to the manufacturer’s instructions. A PFS is typically provided for processed products that do not have a CN label. Additional guidance and technical assistance related to CN labels and PFS may be found at [“Manufacturer Documentation: Child Nutrition Labels and Product Formulation Statements” website](#). It is the program operator’s responsibility to request and verify that the supporting documentation for the PFS is accurate.

Requirements for Documenting Child Nutrition (CN) Labeled Products

The CN label is the gold standard for verifying the meal pattern contributions of processed products and provides a warranty against audit claims when the product is used according to the manufacturer’s instructions. CN-labeled products are processed under a quality control plan administered by USDA’s Agricultural Marketing Service or Department of Commerce’s National Oceanic and Atmospheric Administration Seafood Inspection Program. Only food products that contribute a minimum of 0.50 ounce equivalent (oz eq) meats and meat alternates (M/MA) are eligible for a CN label. Program operators are not required to offer processed products with CN labels.

Valid and acceptable documentation for the CN label includes:

- 1) the original CN label from the product carton; or
- 2) a photocopy of the CN label shown attached to the original product carton; or

- 3) a photograph of the CN label shown attached to the original product carton; or
- 4) a CN label copied with a watermark displaying the product name and CN number provided by the vendor and the Bill of Lading (invoice).

CN labels that are photocopied or photographed must be visible and legible.

CN Label Verification System

The [CN Label Verification System](#) is available to assist program operators and State reviewers in verifying the status of a CN label as well as the crediting information. During a State agency monitoring process, reviewers are encouraged to use this system to verify crediting information and the validity of the CN number on a CN label. For example, if a manufacturer has not updated the authorization date on the CN label, the CN Label Verification Report would include the updated “Valid Until” date of the label.

Dates related to CN Labels

Once authorized, CN labels are valid for five years under the condition that the manufacturer remains an authorized CN producer and the product formulation does not change. The date printed on the CN label is the original date of authorization or the date of the most recent authorization for use of that CN label. This is different from the “Valid Until” date shown on the [CN Label Verification Report](#), which indicates when the current authority to use the label expires. Manufacturers may choose to leave the original authorization date on the label when they receive reauthorization of their CN label so that label inventories do not go to waste. For example, if a CN label was originally authorized on February 15, 2024, it is valid until February 15, 2029. The manufacturer may resubmit the same product for reauthorization of the CN label. If reauthorization is granted, the “Valid Until” date is updated to five years from the most recent date of authorization on the CN Label Verification Report, but the date on the CN label may remain as 02/24.

Requirements for Documenting Watermarked CN Labels

A CN label copied with a watermark is used when the CN logo and contribution statement are presented on product information separate from the actual product carton. Manufacturers may provide program operators with a watermarked CN label during the bidding process. (Note: original CN labels on product cartons will not have a watermark.) Program operators should be aware that product information on the watermarked CN label can be changed. Therefore, program operators are encouraged to verify that the watermarked CN label came from a product that was purchased and accurately reflects that product.

A watermarked CN label along with the Bill of Lading (invoice) is acceptable documentation for a State agency monitoring process. Valid and acceptable documentation for the watermarked CN label includes:

- 1) a hard copy of the CN label copied with a watermark displaying the product name and CN number provided by the vendor; or
- 2) an electronic copy of the CN label with a watermark displaying the product name and CN number provided by the vendor.

Requirements for Product Formulation Statements (PFS)

When purchasing a processed product without a CN label, a program operator may request a signed PFS on the manufacturer's letterhead that demonstrates how the processed product contributes to the meal pattern requirements. Program operators are responsible for verifying that the calculations and contribution statement on a manufacturer's PFS are accurate. Guidance materials such as the PFS templates, the "[Tips for Evaluating a Manufacturer's Product Formulation Statement](#)", FBG, and other resources are available to assist with verifying calculations and the contribution statement. A manufacturer's PFS is not approved by USDA; however, manufacturers may request technical assistance on completing a PFS by contacting FNS at cnpntab@usda.gov.

Reviewing Product Formulation Statements

An acceptable PFS demonstrates how the processed product contributes toward the CNP meal pattern. While only processed products that contain at least 0.5 oz eq of M/MA are eligible for CN labels, a PFS can be used to document meal pattern contributions for any processed food product.

A PFS may include crediting information for more than one meal component. For instance, a cheese pizza may credit toward the M/MA, grains, and the red/orange vegetable subgroup. The manufacturer must clearly identify how each component contributes to meal pattern requirements. When reviewing a PFS prior to purchasing a processed product, refer to [“Tips for Evaluating a Manufacturer’s Product Formulation Statement.”](#)

Program operators are encouraged to review product documentation carefully, as they are responsible for ensuring the meals they serve meet meal pattern requirements (see Attachment A: Verifying Acceptable Documentation of CN Labels During State Agency Monitoring Process). Any crediting information received from a manufacturer other than a valid CN label must be verified by the program operator for accuracy. To avoid additional burdens on food industry partners, reviewers and program operators must not request a PFS or additional crediting information when a valid CN label or watermarked CN label is provided. Program operator requests for technical assistance on product crediting, acceptable documentation, and meal pattern requirements should be directed to their State agency.

State agencies are reminded to distribute this information to program operators immediately. Program operators should direct any questions regarding this memorandum to the appropriate State agency. State agencies should direct questions to the appropriate FNS [Regional Office](#).

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Attachment

Attachment A

VERIFYING ACCEPTABLE DOCUMENTATION OF CN LABELS DURING THE STATE AGENCY MONITORING PROCESS

