

Commercially Processed Food Documentation

Some centers choose to purchase commercially processed meat/meat alternate (m/ma) products rather than prepare these main dish items on site, which are commonly referred to as “homemade” or “cooked from scratch.” Some reasons a center may purchase these convenience items are due to the lack of skilled labor or inadequate kitchen preparation equipment. The quality of commercially processed foods varies greatly from manufacturer to manufacturer and from product to product. Because the meal pattern contribution for commercially processed foods cannot be verified, all At-Risk Afterschool sites are required to maintain documentation to verify the meal pattern contribution to the Child and Adult Care Food Program (CACFP).

Fact sheets, food specification sheets and product labels formerly provided a way for food manufacturers to communicate with program operators about how their products may contribute to the meal pattern requirements for meals served under the United States Department of Agriculture (USDA) Child Nutrition Programs (CNP). Complaints to the Food and Nutrition Service (FNS) about inaccurate or misleading product literature, product labels, and fact sheets have become common.

As a result, the USDA released two Policy Memos on March 11, 2015 [[CACFP 09-2015](#) and [CACFP 10-2015](#)], detailing two types of acceptable documentation approved to verify meal pattern compliance: **Child Nutrition (CN) label or manufacturer’s product formulation statement (PFS)**. **NOTE: Center product analysis method to document the amount of meat/meat alternate is no longer acceptable.**

Type #1 CN label:

The Child Nutrition Labeling Program is administered by USDA, FNS in cooperation with the following agencies: Agriculture Marketing Service, Food Safety and Inspection Service, and National Marine Fisheries Service.

Main dish products contributing to the meat/meat alternate component of the meal pattern requirements are eligible for a CN label. Examples of these products include beef patties, cheese or meat pizzas, meat or cheese and bean burritos, egg rolls, and breaded fish portions.

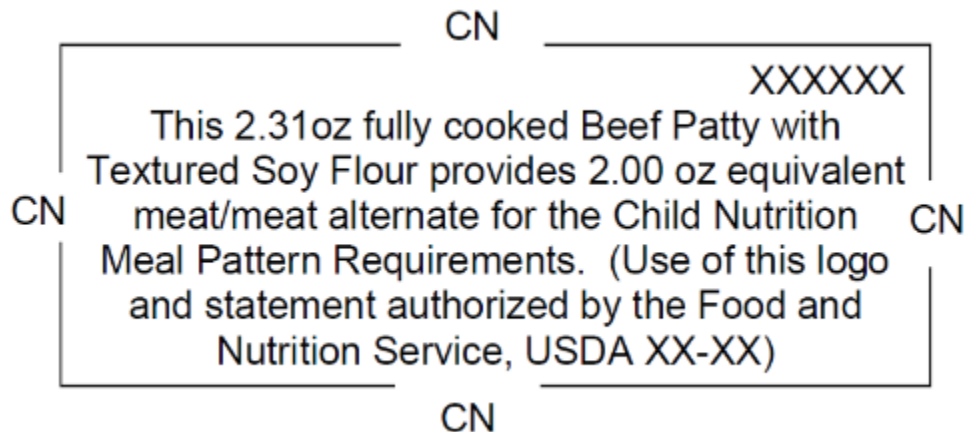
Advantages of using a CN-labeled product include:

- A CN label statement clearly identifies the contribution of a product toward the meal pattern requirements. It protects Child Nutrition program operators from exaggerated claims about a product.
- A CN label provides a warranty against audit claims if the CN-labeled product is used according to the manufacturer’s directions.
- CN labels simplify cost comparisons of like products.

The CN label product will always contain:

- The CN logo, which has a distinct border;
- The meal pattern contribution statement;
- A unique six-digit product identification number assigned by USDA/FNS appears in the upper right hand corner of the CN label
- The USDA/FNS authorization statement;
- The month and year of the final approval.
- The remaining required label features include product name, inspection legend, ingredient statement, signature/address line, and net weight.

A sample CN logo:



Note: The X's in the sample CN Logo are only used to demonstrate the placement of the CN identification number and the final date. If you receive a CN labeled product containing all X's (all zeroes, or non-number symbols) for the CN identification number, the label is not valid. If a CN label is not valid, FNS cannot provide a warranty for its use toward meal pattern requirements.

The CN label is the gold standard for verifying the crediting of menu items and provides a warranty against audit claims when the product is used according to the manufacturer's instructions.

Acceptable and valid documentation for the CN label includes (CACFP 08-2015 and CACFP 09-2015):

- The original CN label removed from the product carton; or
- A photocopy of the CN label shown attached to the original product carton; or
- A photograph of the CN label shown attached to the original product carton.
- CN labels that are photocopied or photographed must be visible and legible.

NOTE: if none of the required documentation is available, program operators may provide the bill of lading or invoice containing the product name and a hard or electronic copy of the CN Label with a watermark displaying the product name and CN number provided by the vendor. A CN label with a watermark is used when the CN logo and contribution statement are used on product information other than the actual product carton and are presented as a separate document. Manufacturers may provide schools (which is not common for CACFP providers) with a CN Label and a watermark during the bidding process. Original CN labels on product cartons will not have a watermark.

Type #2 Product Formulation Statement (PFS):

The Product Formulation Statement should only be requested when reviewing a processed product without a CN label. PFSs are written and provided by individual manufacturers and are not commonly seen in CACFP facilities. *It is the facility's responsibility to request and verify that the processed food documentation is accurate prior to purchasing processed products.* PFS templates for each meal component are available on USDA's CN labeling website. Manufacturers may use PFS templates as a guide to help develop a PFS. However, they are not required to use the same format as the USDA's template, but they must present the same

information on their company letterhead. It should be noted that a PFS does not provide any warranty against audit claims. Unlike CN labels, a PFS that claims a meal pattern contribution is not a guarantee of USDA meal pattern compliance and can be disputed during a CACFP monitoring review.

The answer to each of the following questions should be yes:

- Is the PFS on signed company letterhead? The signature can be handwritten, stamped, or electronic.
- Does the PFS include the product name, product code number, and serving/portion size?
- Do the creditable ingredients listed on the PFS match or have a description similar to the ingredients listed on the product label? For example, if the PFS lists ground beef as not more than 20% fat, the product label should also list ground beef as not more than 20% fat.
- Do the creditable ingredients listed on the PFS match or have a similar description to a food item listed in the Food Buying Guide for Child Nutrition Programs?
- If the product is a meat/meat alternate, does it contain an Alternate Protein Product (APP) such as soy concentrate? If yes, does the manufacturer provide supporting documentation that meets USDA APP requirements?
- Does the PFS demonstrate how creditable ingredients contribute toward the meal pattern requirements?
- Are the manufacturer's calculations correct and verified?

The PFS should include:

- Weight of raw portion; percent of raw meat or poultry; percent of fat of raw meat.
- Weight of an APP, if applicable; percent of an APP on an as-is basis for the as-purchased product; certification that an APP meets the USDA, FNS requirements.
- Product's total creditable amount of product per portion towards the meal pattern.
- Certification statement that the PFS is an accurate verification of meal pattern compliance.
- Original signature and title of company official and date.

Product Formulation Statement (PFS) – *Approved Example:*

XYZ Burrito Factory (Manufacturer's Letterhead)

Effective Date: August 23, 2021 Product No. 9999

Total weight of precooked product: 4.00oz.

Total of raw meat: 0.650 oz.

Percent of fat of raw meat: Not to exceed 30%

Weight of dry Volume per Portion (VPP): 0.094 oz.

Weight of liquid used to hydrate APP: 0.176 oz.

Percent of Protein in dry APP: 52%

Weight of raw meat and hydrated APP: 0.920

Type of APP used: XX Flour: _____ Isolate: _____

Weight of other ingredients: 1.005 oz.

Weight of pinto beans: 0.325 oz. Factored Wt. 0.503

Weight of cheese: none

Weight of cooked meat with APP: 0.64 oz.

Total weight of filling: 2.25 oz.

Total weight of enriched flour tortilla: 1.75 oz. 1.59 serving

I certify the above information is true and correct and that the product (ready for serving) contributes 1.14 ounces of equivalent meat/meat alternative toward the meal pattern when prepared according to direction. I understand that the above named product will be used as a meal component for which Federal reimbursement will be claimed, and that records are available to support the information indicated above. The APP used conforms to Food and Nutrition Service regulations. This product formulation will supersede all previously issued sheets.

SUGGESTED BID SPECIFICATIONS: _____ cases – Red Chili Beef, Bean and Chicken Burrito, 4.00 oz. Each, unfried, packed 3/24 count. Must meet 1.00 ounces of meat/meat/alternate and 1.50 bread servings.

James Smith

Director of Manufacturing

James Smith

Title

XYZ Burrito Factory

August 23, 2023

All documentation regarding processed foods must be maintained in the center files. If no information is available at the time of a monitoring review, the meals containing the processed foods may be disallowed.

Helpful Resources:

USDA's CN Labeling Website includes general background of the CN Labeling Program and provides helpful information for food manufacturers and child nutrition programs. It can be accessed at <https://www.fns.usda.gov/cnlabeling/child-nutrition-cn-labeling-program> or from the **USDA Food Buying Guide for Child Nutrition Programs- Appendix C.**

The CN Label Verification Reporting System can also be accessed from the link and from Appendix C. The system was developed to assist state reviewers, program operators, and the

food industry in verifying the status of a CN label and the validity of a CN label. The system produces two reports monthly:

- CN Label Verification Report includes all information pertaining to the valid CN label, which includes the crediting information (meal pattern contribution statement), label expiration date, and the manufacturer's establishment number.
- CN Label Manufacturers Report includes contact information for manufacturers authorized to produce CN-labeled products. This report allows users to link the manufacturer's list from the CN Label Verification Report.