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**United States
Department of
Agriculture**

Food and
Nutrition
Service

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

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

This memorandum is being reissued with updated references to clarify common issues related to inaccurate or misleading product literature, product labels, and factsheets; provide guidance about how product literature can be used to make purchasing decisions; and share sample Product Formulation Statements that can be used to document a

Factsheets and product labels provide a way for food manufacturers to communicate with program operators about how their products may contribute to the meal pattern

Nutrition (CN) Programs. The USDA Food and Nutrition Service (FNS) frequently receives inquiries about inaccurate or misleading product literature, product labels, and factsheets.

CN Labeled Products

Schools and other program operators are not required to offer processed products with CN Labels. However, it is important to recognize that CN Labeled products provide an assurance that foods provide the stated contributions toward CN meal pattern requirements. CN labeled products are processed under a Quality Control plan

Commerce
(USDC) National Marine Fisheries Service using guidelines provided by FNS. CN Labels are only available for items that contribute toward the meat/meat alternates component of the meal pattern.

Program operators must keep records of the original CN Label from the product carton. If the actual CN Label is laser printed on the product carton or cannot be easily removed, then a photocopy of the valid CN Label may be provided during an administrative review, as acceptable documentation. A photograph of the CN Label while it is attached to the product carton is also acceptable documentation. CN Labels that are photocopied or photographed must be visible and legible.

Since CN Labeled products provide program operators with a warranty against audit claims when Product Formulation Statement when a valid CN Label logo and crediting statement is provided during an Administrative Review.

FNS is currently working with the Agricultural Marketing Service to develop a CN Label verification system. This system will assist State reviewers during the administrative review, to verify the status of a CN Label as well as the corresponding contribution statement. The expected completion date for this verification system is Fall 2015.

Product Formulation Statements/Other Documentation

When purchasing a processed product without a CN Label, a program operator may request a processed product contributes to the meal pattern requirements. Program operators must maintain files on nutrient information to meet the requirements of program regulations in 7CFR 210 and 220. If there is no Nutrition Facts panel on the processed product, nutrient information must be obtained from the manufacturer.

Program operators are ultimately responsible if a menu does not fulfill meal pattern requirements; therefore they must keep records of supporting documentation. It is the program

General Guidance for Reviewing Product Formulation Statements

An appropriate Product Formulation Statement will provide specific information about the product and show how the food credits toward the CN meal pattern citing CN Program resources and/or regulations. Specific policies for Alternate Protein Products and Food-Based Menu Planning are available on the FNS Web site at <http://www.fns.usda.gov/cnlabeling/food-manufacturersindustry>.

When reviewing Product Formulation Statements prior to purchasing processed products, refer to: *A Reviewer's Checklist for Evaluating a Manufacturer Product Formulation Statement for Meat/Meat Alternate Products* on the FNS Web site at http://www.fns.usda.gov/sites/default/files/reviewer_checklist.pdf

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Product Formulation Statement templates for documenting the meat/meat alternates (M/MA), grains and fruits/vegetables components are available on the FNS Web site at

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Regional offices are asked to ensure that State agencies are aware of the process for verifying acceptable documentation and proper procedures for handling products with a valid CN Label. State agencies should direct any questions concerning this guidance to the appropriate FNS Regional office. Regional offices with questions or concerns should contact the National Office, Child Nutrition Programs.

Original Signed

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