

# Accepting Processed Product Documentation

<b>Nutrition Services Division Management Bulletin</b>	
<b>Purpose:</b> Policy, Action Required	
<b>To:</b> School Nutrition Program Sponsors, Child and Adult Care Food Program Sponsors, Summer Food Service Program Sponsors, Food Distribution Program Recipient Agencies, and U.S. Department of Agriculture Foods Processors	<b>Number:</b> USDA-CNP-05-2013
<b>Attention:</b> Food Service Directors, Executive Directors, Owners, Members, Program Directors, and U.S. Department of Agriculture Foods Processors	<b>Date:</b> August 2013
<b>Subject:</b> Guidance for Accepting Processed Product Documentation for Meal Pattern Requirements	
<b>Reference:</b> U.S. Department of Agriculture Technical Assistance Memorandum 07–2010 REVISED	

This Management Bulletin (MB) provides clarification to Child Nutrition Program (CNP) sponsors on the requirements for documenting processed end products to ensure that they meet meal pattern requirements. This MB also outlines what documentation must be on file and available to the California Department of Education during an Administrative Review (AR) or any other outside review/audit.

## Crediting Methods

Sponsors have the option to choose the crediting method that best fits the specific needs of the menu planner, however, food manufacturers are required to communicate with sponsors about how their products contribute to the meal pattern. The challenge when using processed end products is obtaining the information necessary to guarantee that meals served meet the required food components. There are two main methods to ensure that processed end products meet meal pattern requirements:

1. Child Nutrition (CN) Labels
2. Product Formulation Statements (PFS)

## Child Nutrition Labels

The U.S. Department of Agriculture's (USDA) CN label program is a voluntary federal program that ensures a processed end product provides the stated contribution toward the meal pattern.

Specifically, a CN label provides the:

- CN logo
- Contribution toward meal pattern requirements
- Product identification number assigned by the USDA
- Month and Year of approval

In order for a product to carry a CN label, the end product must first be evaluated by the USDA's Food and Nutrition Service (FNS) to determine its contribution toward the meal pattern and then be produced under federal inspection by the USDA or the U.S. Department of Commerce. The CN label program provides a guarantee for purchasers of CN labeled products against AR and/or other outside review/audit claims.

CN labels are only available for main dish/entrée processed end product(s) which contribute at least 0.5 ounce equivalents to the meat/meat alternate component of the meal pattern (e.g., cheese and bean burritos, cheese or meat pizzas, breaded fish). To better serve sponsors, CN labels now reflect whole grain rich and vegetable subgroup contributions. A CN label is considered valid until the product formulation changes or five years has lapsed, whichever comes first.

The USDA's Agricultural Marketing Service has published a list of manufacturers that have met all the requirements of the CN Labeling Program and a list of approved CN labeled end products with their assigned CN label numbers. The lists are updated monthly and will not reflect newly approved manufacturers, labels, or any processed end products approved before 2005. To view the lists, please visit the USDA's Authorized Manufacturers and Labels Web page at <http://www.fns.usda.gov/cnd/cnlabeling/authorized.htm>. This is for informational purposes only, and is not considered acceptable proof of CN labeling for use during an AR.

## Product Formulation Statements

In the event that a processed end product does not have or cannot obtain a CN label, sponsors should obtain a complete and signed PFS. A PFS demonstrates how the processed end product contributes toward meal pattern requirements and should include contribution to all components on the same PFS. The USDA has developed PFS templates that can be used as a guide when developing a PFS. PFS samples can be found on the USDA's Food Manufacturers Web page under the subheading Manufacturer's Product Formulation Statement at <http://www.fns.usda.gov/cnd/cnlabeling/foodmanufacturers.htm>.

The templates serve as a guide and are **not** required. An acceptable PFS must be completed on the manufacturer's letterhead and include the following:

- Product name, code number, and serving size
- Type and weight of the creditable ingredient
- Printed name, signature, and title of the company representative certifying that the information on the PFS is true and correct (electronic and/or font signatures are acceptable)
- Date signed

A PFS must prove how the claimed credit was obtained in the finished product. It is never acceptable for a manufacturer to simply state that the product provides a certain amount of credit. All manufacturers should use the yields found in the USDA's *Food Buying Guide for Child Nutrition Programs (FBG)* to calculate meal pattern contributions. If a PFS for a specific end product claims to provide a higher credit than listed in the *FBG*, the PFS must demonstrate how the product provides that credit according to FNS regulations, guidance, or policy. A PFS does not provide any guarantee against AR and/or other outside review/audit claims.

To view the *FBG*, please visit the USDA's Resource Library Web page at <http://teamnutrition.usda.gov/Resources/foodbuyingguide.html>.

Note: All sponsors must maintain files on nutrient information to meet program regulations; therefore, we recommend including the Nutrition Facts panel on the PFS to ensure program compliance.

## Product Formulation Statement Validation

Sponsors are ultimately responsible to ensure that a menu fulfills meal pattern requirements; therefore, all PFSs should be validated. In an effort to support sponsors and manufacturers and expedite the AR process, the Nutrition Services Division (NSD) staff are available to validate calculations for contribution to the meal pattern. This process **does not** provide an official approval for an end product nor should sponsors wait for the NSD to validate their own calculations on the PFS before the end product is used. Manufacturers interested in having their PFS calculations validated can send electronic copies of the PFS to [productformulation@cde.ca.gov](mailto:productformulation@cde.ca.gov).

The NSD is in the process of upgrading the Child Nutrition Information and Payment System (CNIPS) Food Distribution Module to house all validated PFSs. This will allow sponsors to download and print the validated PFS for their files and use during ARs. The NSD anticipates this new CNIPS functionality to be available during the 2013–14 school year; however, in the interim all validated PFSs will be made available in the Download Forms section of the CNIPS School Nutrition Program module. To access the PFSs:

- Log into the CNIPS at <https://www.cnips.ca.gov>
- Select **School Nutrition Programs**
- Select **Applications**
- Select **Download Forms**

All validated PFSs will be listed by manufacturer and include the product name and code number in the description. Sponsors can download, print, and keep the validated PFSs on file.

## **Record Retention**

Title 7, *Code of Federal Regulations*, sections 210.23(c), 220.8(a)(3), 225.8(a), 226.10(d), and 250.16(b) require that all sponsors retain documentation on how the menu and/or food items contribute to the meal pattern for a period of three years from the close of the fiscal year to which they pertain.

Sponsors utilizing a CN label to document an end product's contribution must retain either the original CN label, or a photocopy of the original CN label from the box.

Sponsors utilizing a PFS to document an end product's contribution must retain a copy of the PFS with the validated calculations. Contribution calculations should be verified by either the state or the sponsor.

For questions regarding this MB, please contact Stephanie Ewing, Manager, Distribution and Processing Unit, by phone at 916-445-4850 or by e-mail at [sewing@cde.ca.gov](mailto:sewing@cde.ca.gov), or Louise Casias, Nutrition Education Consultant, Education and Nutrition Policy Unit, by phone at 916-322-9943 or by e-mail at [lcasias@cde.ca.gov](mailto:lcasias@cde.ca.gov).

**Questions: Nutrition Services Division | 800-952-5609**

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