

Accepting Processed Product Documentation in the National School Lunch Program and School Breakfast Program

This guidance applies to the meal patterns for grades K-12 and preschoolers (ages 1-4) in the U.S. Department of Agriculture's (USDA) National School Lunch Program (NSLP), School Breakfast Program (SBP), Seamless Summer Option (SSO) of the NSLP, and Afterschool Snack Program (ASP) of the NSLP. For information on the NSLP, SBP, and ASP meal pattern and crediting requirements for grades K-12, visit the Connecticut State Department of Education's (CSDE) [Meal Patterns for Grades K-12 in School Nutrition Programs](#) and [Crediting Foods in School Nutrition Programs](#) webpages. For information on the meal pattern and crediting requirements for preschoolers, visit the CSDE's [Meal Patterns for Preschoolers in School Nutrition Programs](#) webpage.



School food authorities (SFAs) must be able to document the meal pattern contribution of commercial processed foods served in reimbursable meals and ASP snacks. For example, to credit one slice of commercial pizza as 2 ounce equivalents (oz eq) of the meat/meat alternates component and 2 oz eq of the grains component, the manufacturer's documentation must indicate that the serving contains 2 ounces of cheese and 2 ounces of whole grain-rich (WGR) or enriched crust.

The acceptable types of documentation for commercial processed foods are:

- the original Child Nutrition (CN) label from the product carton or a photocopy or photograph of the CN label shown attached to the original product carton; or
- a product formulation statement (PFS) signed by an official of the manufacturer stating the amount of each meal pattern component contained in one serving of the product.

SFAs must obtain a PFS for all commercial processed products that are not CN labeled. Crediting documentation must be maintained on file. The CSDE will review this information during the Administrative Review of the school nutrition programs.

Commercial processed products without a CN label or PFS cannot credit in school meals or ASP snacks.



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Comparison of CN Labels and PFS Forms

CN labels are the definitive documentation for verifying a product’s crediting information for the Child Nutrition Programs. PFS forms are different from CN labels and do not provide the same guarantee of a product’s meal pattern compliance. Table 1 compares CN labels and PFS forms.

Table 1. Comparison of CN labels and PFS forms		
Requirement	CN labels	PFS forms
Standard information required	✓	
Reviewed, approved, and monitored by the USDA	✓	
Includes USDA’s guarantee of meal component contribution for Child Nutrition Programs	✓	
Distinct six-digit product identification number	✓	
Sponsors must check crediting information for accuracy		✓

Only CN labels provide a guarantee of the product’s contribution to the USDA’s meal patterns for the Child Nutrition Programs. SFAs must check the crediting information of PFS forms for accuracy prior to using commercial products in reimbursable meals and ASP snacks.

Manufacturers are responsible for ensuring that commercial products are processed to meet the meal pattern contribution stated on the PFS. SFAs are responsible for verifying the PFS form’s crediting information and maintaining this documentation on file for the CSDE’s Administrative Review of the Child Nutrition Programs.

Training on the requirements for CN labels and PFS forms is available in Module 6: Meal Pattern Documentation of the CSDE’s training program, *What’s in a Meal: National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12*.

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Child Nutrition (CN) Labels

The USDA Food and Nutrition Service (FNS) CN Labeling Program is a voluntary federal labeling program for the Child Nutrition Programs. Food manufacturers have the option to include a standardized food crediting statement on their product labels, which the USDA approves prior to use. Manufacturers participating in the CN Labeling Program must have quality control procedures and inspection oversight that meet USDA's requirements.

A CN label statement clearly identifies the contribution of a commercial product toward the meal pattern requirements, based on the USDA's evaluation of the product's formulation. CN labeling provides a warranty that the product contributes to the meal pattern requirements, as printed on the label.

CN labels are available only for main dish entrees that contribute at least ½ oz eq of the meat/meat alternates component. Some examples include beef patties, pizza, and breaded fish portions.



CN labels also typically indicate the contribution of other meal components that are part of these products. For example, CN-labeled pizza may list contributions to the meat/meat alternates, grains, and vegetables components. CN-labeled breaded chicken nuggets may list contributions to the meat/meat alternates and grains components.

Acceptable documentation for CN labels

Acceptable and valid documentation for a CN label includes the original CN label from the product carton or a photocopy or photograph of the CN label shown attached to the original product carton. If the original CN label or a photocopy or photograph of the original CN label is not available, a watermarked CN label is acceptable documentation for the Administrative Review of the school nutrition programs if it attached to a bill of lading (invoice).

For more information on CN labels, refer to the CSDE's resource, [Child Nutrition \(CN\) Labeling Program](#), and the USDA policy memos, [SP 11-2015 \(v2\)](#), [CACFP 10-2015](#) and [SFSP 13-2015: CN Labels Copied with a Watermark Acceptable Documentation](#), and [SP 27-2015](#), [CACFP 09-2015](#) and [SFSP 12-2015: Administrative Review Process Regarding the Child Nutrition \(CN\) Label, Watermarked CN Label and Manufacturer's Product Formulation Statement](#). Additional guidance is available in the “[Crediting Commercial Processed Products for Grades K-12 in School Nutrition Programs](#)” and “[Crediting Commercial Processed Products in Preschool Menus](#)” sections of the CSDE's school nutrition programs webpages. For training on CN labels, refer to Module 6: Meal Pattern Documentation of the CSDE's training program, [What's in a Meal: National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12](#).

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Product Formulation Statement (PFS)

A PFS is a document developed by manufacturers that provides specific information about how a product credits toward the USDA meal patterns for the Child Nutrition Programs. Unlike CN labels, the information on PFS forms can vary among manufacturers because these forms are not reviewed, approved, or monitored by the USDA.

Requirements for PFS forms

The PFS must be on company letterhead and signed by a person of authority in the company, such as the quality control manager or the appropriate staff in nutrition or research and development. To be acceptable as crediting documentation for the Child Nutrition Programs, the PFS must include the following elements:

- product name,
- product code;
- serving or portion size;
- creditable ingredients;
- and information to demonstrate how creditable ingredients contribute toward the school meal patterns.

ABC Chicken Company

Product Formulation Statement for Documenting Meats/Meat Alternates (M/MA) in Child Nutrition Programs

Program operators should include a copy of the label from the purchased product package in addition to the following information on this form signed by a staff or company representative.

Product Name: Grilled Chicken Nuggets Code No.: 123456
Manufacturer: ABC Chicken Company Serving Size: 4 nuggets (2.8 ounces)

I. Meats
Fill in the chart below to determine the creditable amount of meats.

DESCRIPTION OF CREDITABLE MEAT INGREDIENT PER FOOD BUYING GUIDE (FBS)	OUNCES PER RAW PORTION OF CREDITABLE MEAT INGREDIENT	MULTIPLY	P/B YIELD	CREDITABLE AMOUNT
	A		B	A x B
Boneless chicken without skin	2.85 ounces	x	0.73	2.1 ounces
		x		
		x		
C. Total Creditable Meats Amount*				2.1 ounces

* P/B yield - Additional information column.

Total weight (per portion) of product as purchased: 2.8 ounces

Total creditable amount of product (per portion). (Revised: total creditable amount (per portion) cannot exceed the total weight (per portion)) 2 ounces equivalent

I certify that the above information is true and correct and that a 2.0 ounce serving of the above product (ready for serving) contains 2 ounces of equivalent meat/meat alternate when prepared according to directions.

I further certify that any APF used in the product conforms to the Food and Nutrition Service Regulations (7 CFR Parts 295, 299, 225, 226, Appendix A) as demonstrated by the attached supplier documentation.

John Smith, President
Signature: _____ Title: _____
John Smith, 12/09/2022, (800) 123-4567
Printed Name: _____ Date: _____ Phone Number: _____

The PFS must also include the product's label with the ingredients statement. For detailed guidance on each required element and how to review a PFS, refer to the CSDE's resource, [Using Product Formulation Statements in the School Nutrition Programs](#), and the USDA's [Tips for Evaluating a Manufacturer's Product Formulation Statement](#).

SFAs must check the manufacturer's crediting information for accuracy prior to including the product in reimbursable meals and ASP snacks. PFS forms that do not meet these requirements cannot be accepted as crediting documentation for the school nutrition programs. SFAs must request a revised PFS (and supporting documentation if needed) from the manufacturer.

Additional guidance on PFS forms is available in the “[Crediting Commercial Processed Products for Grades K-12 in School Nutrition Programs](#)” and “[Crediting Commercial Processed Products in Preschool Menus](#)” sections of the CSDE's school nutrition programs webpages. Training on the requirements for PFS forms and how to evaluate a PFS is available in Module 6: Meal Pattern

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Documentation of the CSDE's training program, *What's in a Meal: National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12*.

Resources

Authorized Manufacturers and Labels (USDA webpage):

<https://www.fns.usda.gov/cnlabeling/usdausdc-authorized-labels-and-manufacturers>

Child Nutrition (CN) Labeling Program (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/CN_Labeling_Program.pdf

Crediting Commercial Processed Products in Preschool Menus (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-Preschoolers-in-School-Nutrition-Programs/Related-Resources#CommercialProducts>

Crediting Commercial Processed Products in School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-School-Nutrition-Programs#CommercialProducts>

Food Buying Guide for Child Nutrition Programs (USDA):

<https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs>

Food Manufacturers/Industry (USDA webpage):

<https://www.fns.usda.gov/cnlabeling/food-manufacturersindustry>

Reviewer's Checklist for Evaluating Manufacturer Product Formulation Statements for Meat/Meat Alternates (USDA):

https://fns-prod.azureedge.us/sites/default/files/reviewer_checklist.pdf

Tips for Evaluating a Manufacturer's Product Formulation Statement (USDA):

<https://fns-prod.azureedge.us/sites/default/files/resource-files/manufacturerPFStipsheet.pdf>

USDA Memo TA-2010 (v.3): Guidance for Accepting Processed Product Documentation for Meal Pattern Requirements:

<https://fns-prod.azureedge.us/sites/default/files/resource-files/TA07-2010v3os.pdf>

Using Product Formulation Statements in the School Nutrition Programs (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/Product_Formulation_Statements.pdf

What's in a Meal Module 6: Meal Pattern Documentation (CSDE's Training Program, What's in a Meal: National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12):

<https://portal.ct.gov/SDE/Nutrition/Meal-Pattern-Training-Materials>

When Commercial Grain Products Require a Product Formulation Statement to Credit in the School Nutrition Programs (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/When_Commercial_Grain_Products_Require_PFS_SNP.pdf

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For more information, refer to the CSDE's guides, *Menu Planning Guide for School Meals for Grades K-12* and *Menu Planning Guide for Preschoolers in the NSLP and SBP* or contact the [school nutrition programs staff](#) at the Connecticut State Department of Education, Bureau of Child Nutrition Programs, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This document is available at https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/Accepting_Processed_Product_Documentation_SNP.pdf.

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1. mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
2. fax: (833) 256-1665 or (202) 690-7442; or
3. email: program.intake@usda.gov

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