

Using Product Formulation Statements in the School Nutrition Programs

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 that commercial processed foods (such as burritos, pizza, and chicken nuggets) provide the correct amount of the food components being credited toward the USDA meal patterns. For example, to credit a commercial cheese pizza as 2 ounce equivalents (oz eq) of the meat/meat alternates (MMA) component and 2 oz eq of the grains component, SFAs must obtain documentation from the manufacturer indicating that one serving of the product contains 2 ounces of cheese and 2 ounces of whole grain-rich (WGR) or enriched crust.

Menu planners cannot determine the amount of the meal pattern components in a product by reading the Nutrition Facts label or ingredients statement. If a commercial processed product does not have a Child Nutrition (CN) label, SFAs must obtain a product formulation statement (PFS) from the manufacturer that demonstrates the product’s meal pattern contribution.

A PFS is a document developed by manufacturers that provides specific information about how a product credits toward the USDA meal patterns for 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.

Table 1 shows a sample PFS for a commercial meat/meat alternate product.



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Table 1. Sample PFS for a commercial meat/meat alternate product



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 letterhead signed by an official company representative.

Product Name: Grilled Chicken Nuggets Code No.: 123456

Manufacturer: ABC Chicken Company Serving Size: 4 nuggets (2.6 ounces)

I. Meats

Fill out the chart below to determine the creditable amount of Meats.

DESCRIPTION OF CREDITABLE MEAT INGREDIENT PER FOOD BUYING GUIDE (FBG)	OUNCES PER RAW PORTION OF CREDITABLE MEAT INGREDIENT A	MULTIPLY	FBG YIELD ¹ B	CREDITABLE AMOUNT A x B
Boneless chicken	2.88 ounces	x	.7	2.016
		x		
		x		
C. Total Creditable Meats Amount²				2.016

¹ FBG yield = Additional Information column.

Total weight (per portion) of product as purchased 2.6 ounces

Total creditable amount of product (per portion). (Reminder: total creditable amount (per portion) cannot exceed the total weight (per portion).) 2 ounce equivalents

I certify that the above information is true and correct and that a 2.6 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 APP used in the product conforms to the Food and Nutrition Service Regulations (7 CFR Parts 210, 220, 225, 226, Appendix A) as demonstrated by the attached supplier documentation.

John Smith
Signature

President
Title

John Smith
Printed Name

12/09/2022
Date

(800) 123-4567
Phone Number

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Reviewing a PFS for Accuracy

Prior to purchasing a commercial processed product, SFAs must review the manufacturer’s PFS to ensure that it includes each required element, and the crediting calculations are correct. If any information is missing or incorrect, SFAs must request a revised PFS from the manufacturer, with supporting documentation if needed.

The USDA encourages careful review of product literature. SFAs are accountable for ensuring that reimbursable meals and snacks meet the meal pattern requirements.

Required Information for PFS Forms

A PFS must include the specific information below to be acceptable as crediting documentation for the Child Nutrition Programs. The product’s label with the ingredients statement must also be attached to the PFS. Guidance to assist SFAs with reviewing the PFS for compliance with each requirement is provided where applicable.

1. **Signed company letterhead:** A PFS is an official certified document of the company. It 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. This signature may be handwritten, stamped, or electronic.
2. **Product name:** The product name on the PFS must match or have a similar description to the name on the product label. The table below shows some examples.

Name on label	Name on PFS	Acceptable match?
Crispy breaded square chicken strips	Breaded chicken strips	Yes. The description is similar.
	Chicken	No. “Chicken” does not indicate the type or form of the food, i.e., that the chicken is breaded or in the form of strips.
Early Harvest Green Beans	Beans	No. “Beans” does not sufficiently match the description on the product label because it does not indicate the type of beans.
	Green beans	Yes. This matches the type of beans listed on the product label.

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3. **Product code:** The product code is a unique identifier assigned by the manufacturer. It may include numbers, letters, or a combination of both.
4. **Serving or portion size:** The serving size stated on the PFS should represent the amount of the product as purchased or ready for serving. This is the amount of food needed to provide the creditable amount stated on the PFS. The serving size may be stated as a weight or measure. Servings listed as measures should also include the weight of the measure. Some examples include one beef patty (2 ounces or 56 grams) and 2 pancakes (50 grams).
5. **Creditable ingredients:** The creditable ingredients are the foods or ingredients that contribute to the food components of the USDA meal patterns.
 - The creditable ingredients must match or have a similar description to the ingredients listed on the product's label and a food item in the USDA's *Food Buying Guide for Child Nutrition Programs* (FBG).
 - The PFS must provide information about the creditable ingredients, including the specific type or form, e.g., fresh, frozen, canned, or dry.
 - The PFS must include the percentage of fat for ground beef or ground pork ingredients because this directly correlates to the cooking yield. The percentage of fat is not required for ground poultry, such as turkey and chicken.
 - If the manufacturer claims that the product provides a higher creditable amount than the amount listed in the FBG, the PFS must clarify all credited ingredients and demonstrate how the product provides that creditable amount according to the USDA's regulations, guidance, or policies.



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6. **Information to demonstrate how the creditable ingredients contribute toward the meal pattern:** The PFS must include the information needed for the SFA to calculate the crediting of each ingredient.

- The manufacturer’s crediting calculation must use the appropriate FBG yield for each ingredient. The FBG lists yield information in column 6 (“Additional Information”). For example, the yield for 1 pound of “Beef, Ground, fresh or frozen, no more than 20% fat” is 0.74 pound of cooked ground beef, which is a yield of 74 percent.

Section 1 - Meats/Meat Alternates					
1. Food As Purchased, AP	2. Purchase Unit	3. Servings per Purchase Unit, EP	4. Serving Size per Meal Contribution	5. Purchase Units for 100 Servings	6. Additional Information
Beef, Ground, fresh or frozen*, ¹⁹ <i>no more than 20% fat, Includes USDA Foods, (Like IMPS #136)</i>	Pound	11.80	1 oz cooked lean meat	8.50	1 lb AP = 0.74 lb cooked, drained, lean meat
	Pound	7.89	1-1/2 oz cooked lean meat	12.70	1 lb AP = 0.74 lb cooked, drained, lean meat

- The manufacturer’s crediting calculations must follow the rounding rules for the meal pattern contribution. All creditable amounts must round down to the nearest creditable amount for the specific meal pattern component, i.e., ¼ oz eq for MMA and grains and ⅛ cup for fruits and vegetables. For example, 1.49 oz eq of grains credit as 1.25 oz eq and 2½ tablespoons of vegetables credit as 2 tablespoons, which equals ⅛ cup.

- Note:** Quantities for the MMA component are indicated as oz eq in the NSLP meal pattern for grades K-12, and as ounces in the ASP meal pattern for grades K-12 and the NSLP and ASP preschool meal patterns. The amount that credits as 1 oz eq or 1 ounce of MMA is the same.
 - Note:** Quantities for the grains component are indicated as oz eq in the NSLP and SBP meal patterns for grades K-12 and the NSLP, SBP, and ASP preschool meal patterns; and as servings for the grains/breads component of the ASP meal pattern for grades K-12. Grain oz eq are slightly larger than grains/breads servings.

- The creditable amount cannot exceed the total weight of the product. For example, a hamburger that weighs 1½ ounces cannot credit as 2 oz eq of the MMA component.



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- The creditable components must be visible (recognizable) in the finished product. For example, to credit toward the MMA component, the product must have a visible meat or meat alternate (such as a sausage link, beans, cheese, or peanut butter) and the PFS must specify the method for crediting these items.

The USDA requires that foods must be visible to credit toward the meal patterns. Unrecognizable ingredients do not credit, such as peanut butter in smoothies, pureed tofu in soups, applesauce in muffins, or pureed fruits and vegetables in entrees and other foods. The USDA's intent for this requirement is to ensure that children can easily identify the foods in reimbursable meals and snacks. The USDA emphasizes the importance of the nutrition education aspect of the Child Nutrition Programs, which includes the goal of helping children easily recognize the key food groups that contribute to a healthy meal.

- The PFS for products that contain alternate protein products (APPs) must provide supporting documentation that these ingredients meet the USDA's APP requirements (Appendix A of the [NSLP](#) and [SBP](#) regulations). Acceptable documentation includes a CN label, or a PFS from the manufacturer with supporting documentation on company letterhead that the APP ingredient meets the USDA's requirements (refer to the sample documentation on page 6 of the USDA's [Questions and Answers on Alternate Protein Products](#)). For additional guidance, refer to the CSDE's [Requirements for Alternate Protein Products in the NSLP and SBP](#).

PFS forms that do not meet these requirements cannot be accepted as crediting documentation. SFAs must request a revised PFS from the manufacturer, with supporting documentation if needed.

For guidance on how to review a PFS, 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](#). For guidance on how to review a grain PFS, refer to the CSDE's [When Commercial Grain Products Require a Product Formulation Statement to Credit in the School Nutrition Programs](#) or section 6 of the CSDE's guide, [Meeting the Whole Grain-rich Requirement for the NSLP and SBP Meal Patterns for Grades K-12](#).

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USDA PFS Forms and Guidance

The USDA's [Food Manufacturers/Industry](#) webpage contains PFS templates for the meat/meat alternates, grains, fruits, and vegetables components, and resources to assist SFAs with evaluating the accuracy of a PFS. These resources are listed below.

Manufacturers may modify the USDA's PFS forms for various types of commercial products. For example, the PFS for cheese pizza could include crediting information for the vegetables component in addition to the MMA and grains components. Manufacturers may choose to use one PFS to document the crediting information for each meal component but must clearly identify how each component contributes to the meal pattern requirements. The PFS must include the information needed for SFAs to determine how the product contributes to the school meal pattern requirements.

Note: The NSLP, SBP, and ASP meal patterns for grades K-12 and preschoolers have different requirements. The applicable USDA PFS forms for each program are indicated below. Commercial products with appropriate crediting documentation on the PFS forms for grades K-12 in the NSLP and SBP may also credit for grades K-12 in the ASP and preschoolers in the NSLP, SBP, and ASP.

PFS for Meat/Meat Alternates

- Product Formulation Statement (Product Analysis) for Meat/Meat Alternate (M/MA) Products in Child Nutrition Programs (USDA):
https://fns-prod.azureedge.us/sites/default/files/resource-files/PFS_Meats-Meat_Alternates_Fillable_508.pdf
- Questions and Answers on Alternate Protein Products (APP) (USDA):
<https://www.fns.usda.gov/cn/questions-and-answers-alternate-protein-products>
- 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

PFS for Vegetables and Fruits

- **NSLP and SBP for grades K-12:** Product Formulation Statement for Documenting Vegetables and Fruits in School Meal Programs (USDA):
https://fns-prod.azureedge.us/sites/default/files/resource-files/PFS_Veg_Subgroups_Fruits_Fillable_508.pdf

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- **NSLP and SBP for grades K-12:** Product Formulation Statement for Documenting Vegetables and Fruits in School Meal Programs – Completed Sample for Vegetables (USDA):
<https://fns-prod.azureedge.us/sites/default/files/resource-files/PFSsamplevegetables.pdf>
- **NSLP and SBP for grades K-12:** Product Formulation Statement for Documenting Vegetables and Fruits in School Meal Programs: Completed Sample for Fruits (USDA):
<https://fns-prod.azureedge.us/sites/default/files/resource-files/PFSsamplefruits.pdf>
- **NSLP, SBP, and ASP for preschoolers:** Product Formulation Statement for Documenting Vegetables and Fruits in the Child and Adult Care Food Program, Summer Food Service Program, and NSLP Afterschool Snacks (USDA):
https://www.fns.usda.gov/sites/default/files/resource-files/PFS_Total_Veg_Fruits_Fillable_508.pdf

PFS for Grains

- **NSLP and SBP for grades K-12 and NSLP, SBP, and ASP for preschoolers:** Product Formulation Statement for Documenting Grains in Child Nutrition Programs (USDA):
https://www.fns.usda.gov/sites/default/files/resource-files/PFS_Grains_Oz_Eq_Fillable_508.pdf
- **NSLP and SBP for grades K-12 and NSLP, SBP, and ASP for preschoolers:** Product Formulation Statement for Documenting Grains in Child Nutrition Programs – Completed Sample (USDA):
https://www.fns.usda.gov/sites/default/files/resource-files/PFS_Example_Grains_Oz_Eq.pdf
- **ASP for grades K-12:** Product Formulation Statement for Documenting Grains/Breads Servings in the Child and Adult Care Food Program, Summer Food Service Program, and NSLP Afterschool Snacks (USDA):
https://www.fns.usda.gov/sites/default/files/resource-files/PFS_Grains-Breads_Servings_Fillable_508.pdf
- **ASP for grades K-12:** Product Formulation Statement for Documenting Grains/Breads Servings in the Child and Adult Care Food Program, Summer Food Service Program, and NSLP Afterschool Snacks – Completed Sample (USDA):
https://www.fns.usda.gov/sites/default/files/resource-files/PFS_Example_Grains-Breads_Servings.pdf

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For guidance on how to review a grain PFS, refer to the CSDE's *When Commercial Grain Products Require a Product Formulation Statement to Credit in the School Nutrition Programs* or section 7 of the CSDE's guide, *Meeting the Whole Grain-rich Requirement for the NSLP and SBP Meal Patterns for Grades K-12*.

Additional PFS Resources

The resources below provide additional guidance on reviewing a PFS.

- FBG Module 3: Product Formulation Statements (Institute of Child Nutrition):
<https://theicn.docebosaa.com/learn/course/external/view/elearning/139/fbg-module-3-product-formulation-statements-pfs>
- Manufacturer's Product Formulation Statement: Is it Acceptable? (ICN and USDA):
<https://www.youtube.com/watch?v=xtUo70IP9cc>
- Manufacturer's Product Formulation Statement: Is it Acceptable? Presentation Slides (ICN and USDA):
<https://theicn.org/resources/930/march-2016/109876/manufacturers-product-formulation-statement-pfs03-31-16.pdf>
- Tips for Evaluating a Manufacturer's Product Formulation Statement (USDA):
<https://www.fns.usda.gov/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>
- 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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Meal Pattern and Crediting Resources

Afterschool Snack Program Handbook (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/ASP/ASPHandbook.pdf>

Appendix A to 7 CFR 210: Alternate Foods for Meals (USDA):

<https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-210#Appendix-A-to-Part-210>

Appendix A to 7 CFR 220: Alternate Foods for Meals (USDA):

<https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-220#Appendix-A-to-Part-220>

Child Nutrition (CN) Labeling Program (CSDE):

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

Child Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Child-Nutrition-Programs>

Crediting Foods in School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-School-Nutrition-Programs>

Food and Nutrition Service (FNS) instructions (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/FNS-Instructions-for-Child-Nutrition-Programs>

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>

Meal Patterns for CACFP Adult Day Care Centers (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-CACFP-Adult-Centers>

Meal Patterns for CACFP Child Care Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-CACFP-Child-Care-Programs>

Meal Patterns for Grades K-12 in School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-School-Nutrition-Programs>

Meal Patterns for Preschoolers in School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-Preschoolers-in-School-Nutrition-Programs/Documents>

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Meeting the Whole Grain-rich Requirement for the NSLP and SBP Meal Patterns for Grades K-12 (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/WGR_Requirement_SNP_grades_K-12.pdf

Menu Planning Guide for Preschoolers in the NSLP and SBP (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Preschool/Menu_Planning_Guide_Preschool.pdf


Menu Planning Guide for School Meals for Grades K-12 (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Menu-Planning-Guide-for-School-Meals>

USDA Policy Memos for Child Nutrition Programs (USDA's FNS Documents & Forms webpage):

<https://www.fns.usda.gov/resources>

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For more information, visit the CSDE's [Child Nutrition Programs](#) webpage or contact the [Child 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/Product_Formulation_Statements.pdf

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To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/ad-3027.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

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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