Requirements for Alternate Protein Products in the Child and Adult Care Food Program

This guidance applies to reimbursable meals and snacks served in child care centers, family day care homes, emergency shelters, at-risk afterschool care centers, and adult day care centers that participate in the U.S. Department of Agriculture's (USDA) Child and Adult Care Food Program (CACFP).

For information on the CACFP meal patterns for children and the CACFP adult meal patterns, visit the Connecticut State Department of Education's (CSDE) Meal Patterns for the Child and Adult Care Food Program webpage. For information on the crediting requirements, visit the CSDE's Crediting Foods in the Child and Adult Care Food Program webpage and Crediting Documentation for the Child Nutrition Programs webpage.

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Crediting Alternate Protein Products (APPs)

Alternate protein products (APPs) credit as credit as meat alternates toward the meats/meat alternates (MMA) component of the CACFP meal patterns. APPs are food ingredients that may be used alone or in combination with meat, poultry, or seafood. They are processed from soy or other vegetable protein sources and may be dehydrated granules, particles, or flakes. Some examples of APPs include soy flour, soy concentrate, soy isolate, whey protein concentrate, whey protein isolates, and casein. APPs may be used in the dry (nonhydrated), partially hydrated, or fully hydrated form.

APPs are generally used as part of a formed meat patty or in a vegetarian patty resembling a meat product. Examples of foods that might contain added APPs include beef patties, beef crumbles, pizza topping, meat loaf, meat sauce, taco filling, burritos, and tuna salad.

Processed food items such as vegetarian burgers may contain APP, but the food item itself is not an APP because it contains other ingredients such as seasonings or breading. APPs do not include tofu, surimi, seitan, or tempeh.

> One ounce of a creditable APP provides 1 ounce equivalent (oz eq) of the MMA component. The total MMA contribution cannot exceed the weight of the product.

Criteria for APPs

APPs must meet the USDA's requirements specified in appendix A of the CACFP regulations (7 CFR 226). These regulations specify that APPs may credit for part or all of the MMA requirement if they meet the three criteria below.

1. The APP must be processed so that some portion of the non-protein constituents of the food is removed. This refers to the manufacturing process for APP. APP must be safe and suitable edible products produced from plant or animal sources.

2. The biological quality of the protein in the APP must be at least 80 percent of casein (milk protein), determined by performing a Protein Digestibility Corrected Amino Acid Score (PDCAAS). The PDCAAS is a method of evaluating protein quality.

3. The APP contains at least 18 percent protein by weight when fully hydrated or formulated. "When hydrated or formulated" refers to a dry APP and the amount of water, fat, oil, colors, flavors, or any other substances that have been added.

Menu planners cannot determine if an APP product meets these criteria by reading the product's label. The labeling laws of the USDA's Food Safety Inspection Service (FSIS) and Food and Drug Administration (FDA) require manufacturers to list product ingredients, but percentage labeling is voluntary.

For example, a product may list whey protein concentrate and hydrolyzed soy protein in the ingredients but will not indicate the percentage of these protein ingredients by weight. This means that manufacturers must provide the appropriate crediting documentation to demonstrate the product's meal pattern contribution. For more information and frequently asked questions, visit the USDA's Alternate Protein Products webpage.

Required Documentation for APPs

The USDA's *Food Buying Guide for Child Nutrition Programs* does not contain yield information for APPs. CACFP facilities must obtain documentation from the manufacturer that the product meets the USDA's APP criteria. Without appropriate documentation, APPs cannot credit in reimbursable meals or snacks. Acceptable documentation for APPs includes:

- 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) from the manufacturer with supporting documentation on company letterhead that the APP ingredient meets the USDA's requirements. The USDA provides APP sample documentation.

The manufacturer's documentation should include information on the percent protein contained in the dry alternate protein product and in the prepared product. For an APP product mix, manufacturers should provide information on the amount by weight of dry APP in the package, hydration instructions, and instructions on how to combine the mix with meat or other meat alternates. The USDA provides additional guidance on documenting the APP requirements in the "Frequently Asked Questions" section of their Alternate Protein Products webpage.

> If the PFS for a commercial product lists APP ingredients that are being credited as the MMA component, the manufacturer must provide supporting documentation to indicate that the APP ingredients meet the USDA's APP requirements. APP ingredients without this supporting documentation do not credit in reimbursable meals or snacks.

For information on CN labels and PFS forms, refer to the CSDE's resources, *Using Product Formulation Statements in the Child and Adult Care Food Program* and *Using Child Nutrition (CN) Labels in the Child and Adult Care Food Program*, and USDA Memo SP 05-2025, CACFP 04-2025, SFSP 02-2025: *Guidance for Accepting Processed Product Documentation for Meal Pattern Requirements*. Additional guidance is available on the CSDE's Crediting Documentation for the Child Nutrition Programs webpage.

For guidance on reviewing PFS forms, visit the USDA's Child Nutrition Programs: Tips for Evaluating a Manufacturer's Product Formulation Statement webpage. Training on the requirements for CN labels and PFS forms is available Bite Size Module 8: Child Nutrition (CN) Labels and Bite Size Module 9: Product Formulation Statements of the CSDE's training program, *Bite Size: Meeting the Child and Adult Care Food Program (CACFP) Meal Patterns.*

Storing crediting documentation

CACFP facilities must maintain all APP crediting documentation on file in accordance with the records retention requirements for the CACFP. This documentation must be current and will be reviewed by the CSDE during the Administrative Review of the CACFP. For more information, refer to the CSDE's resource, *Records Retention Requirements for the Child and Adult Care Food Program*.

Considerations for Reducing Choking Risks for Young Children

Children younger than 4 are at the highest risk of choking. Some APP foods may be choking hazards, such as tube-shaped meats like hotdogs, sausage, and meat sticks. Consider children's age and developmental readiness when deciding what types of APP foods to offer in preschool menus. Modify menus as appropriate and use preparation techniques to reduce choking risk. For additional guidance, visit the "Choking Prevention" section of the CSDE's Food Safety for Child Nutrition Programs webpage.

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Resources

Accepting Processed Product Documentation in the Child and Adult Care Food Program (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/cacfp/crediting/accepting_processed_product_documentation_cacfp.pdf

Accepting Product Documentation (CSDE's Crediting Documentation for the Child Nutrition Program webpage):
https://portal.ct.gov/sde/nutrition/crediting-documentation-for-the-child-nutrition-programs/accepting-product-documentation

Appendix A of the CACFP Regulations (7 CFR 226):
https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-226#Appendix-A-to-Part-226

Alternate Protein Products (USDA webpage):
https://www.fna.usda.gov/tn/cnp/food-industry-toolkit/app

Alternate Protein Product Sample Documentation (USDA):
https://www.fna.usda.gov/sites/default/files/resource-files/cnl-app-sample.pdf

Bite Size Module 8: Child Nutrition (CN) Labels (CSDE's Training Program, Meeting the Child and Adult Care Food Program (CACFP) Meal Patterns):
https://portal.ct.gov/sde/nutrition/meal-patterns-for-the-child-and-adult-care-food-program/bite-size-meal-pattern-training#module8

Bite Size Module 9: Product Formulation Statements (CSDE's Training Program, Meeting the Child and Adult Care Food Program (CACFP) Meal Patterns):
https://portal.ct.gov/sde/nutrition/meal-patterns-for-the-child-and-adult-care-food-program/bite-size-meal-pattern-training#module9

Child Nutrition Labels (CSDE's Crediting Documentation for the Child Nutrition Program webpage):
https://portal.ct.gov/sde/nutrition/crediting-documentation-for-the-child-nutrition-programs/child-nutrition-labels

Child Nutrition Programs: Tips for Evaluating a Manufacturer's Product Formulation Statement (USDA webpage):
https://www.fna.usda.gov/cn/labeling/tips-evaluating-pfs

Requirements for Alternate Protein Products in the Child and Adult Care Food Program

Crediting Commercial Meat/Meat Alternate Products in the Child and Adult Care Food Program (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/cacfp/crediting/credit_commercial_mma_cacfp.pdf

Crediting Deli Meats in the Child and Adult Care Food Program (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/cacfp/crediting/credit_deli_cacfp.pdf

Crediting Documentation for the Child Nutrition Programs (CSDE webpage):
https://portal.ct.gov/sde/nutrition/crediting-documentation-for-the-child-nutrition-programs

Crediting Tofu and Tofu Products in the Child and Adult Care Food Program (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/cacfp/crediting/credit_tofu_cacfp.pdf

Meats and Meat Alternates Component (CSDE's Crediting Foods in the Child and Adult Care Food Program webpage):
https://portal.ct.gov/sde/nutrition/crediting-foods-in-the-child-and-adult-care-food-program/meats-and-meat-alternates

Product Formulation Statements (CSDE's Crediting Documentation for the Child Nutrition Programs webpage):
https://portal.ct.gov/sde/nutrition/crediting-documentation-for-the-child-nutrition-programs/product-formulation-statements

USDA Memo SP 05-2025, CACFP 04-2025, and SFSP 02-2025: Guidance for Accepting Processed Product Documentation for Meal Pattern Requirements:
https://www.fna.usda.gov/cn/labeling/guidance-accepting-processed-product-documentation

Using Child Nutrition (CN) Labels in the Child and Adult Care Food Program (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/cacfp/crediting/using_cn_labels_cacfp.pdf

Using Product Formulation Statements in the Child and Adult Care Food Program (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/cacfp/crediting/using_product_formulation_statements_cacfp.pdf

What's in a Meal Module 8: Meal Pattern Documentation for Crediting Commercial Processed Products (CSDE's Training Program, What's in a Meal: Meal Patterns for Grades K-12 in the School Nutrition Programs:
https://portal.ct.gov/sde/nutrition/meal-pattern-training-materials#module8

Requirements for Alternate Protein Products in the Child and Adult Care Food Program

For more information, visit the CSDE's Crediting Foods in the Child and Adult Care Food Program webpage or contact the CACFP 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/cacfp/crediting/app_requirements_cacfp.pdf.

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Requirements for Alternate Protein Products in the Child and Adult Care Food Program

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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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