

Using Child Nutrition (CN) Labels 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 meeting the requirements for the CACFP meal patterns for children, visit the Connecticut State Department of Education’s (CSDE) [Meal Patterns for CACFP Child Care Programs](#) webpage and [Crediting Foods in CACFP Child Care Programs](#) webpage. For information on meeting the requirements for the CACFP adult meal patterns, visit the CSDE’s [Meal Patterns for CACFP Adult Day Care Centers](#) webpage, [Crediting Foods in CACFP Adult Day Care Centers](#) webpage. Guidance on the crediting documentation requirements is available on the CSDE’s [Crediting Documentation for the Child Nutrition Programs](#) webpage.



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Overview of CN Labeling Program

The CN Labeling Program is a voluntary federal labeling program for the Child Nutrition Programs. The CN label on a product communicates how the product contributes to the meal pattern requirements. CN-labeled products provide a warranty against audit claims when the product is prepared according to the manufacturer's instructions.

The CN Labeling Program is operated by the USDA Agricultural Marketing Service (AMS) in collaboration with the USDA's Food and Nutrition Service (FNS) and Food Safety and Inspection Service (FSIS), and the U.S. Department of Commerce's National Oceanic and Atmospheric Administration Seafood Inspection Program (NOAA SIP). Manufacturers participating in the CN Labeling Program must have quality control procedures and inspection oversight that meet USDA's requirements.

Eligible products

CN labels are available only for main dish entrees that provide at least ½ oz eq of the MMA component in the meal patterns for the USDA's Child Nutrition Programs. MMA include meat, poultry, and seafood; cheese; yogurt and soy yogurt; dry beans, peas and lentils; whole eggs; tofu; nuts and seeds; nut and seed butters; shelf-stable, dried and semi-dried meat, poultry, and seafood products; surimi seafood; and tempeh.

Examples of CN-labeled products made with MMA include beef patties, cheese or meat pizzas, meat or cheese and bean burritos, egg rolls, and breaded seafood portions. Products contributing only to the grains, fruits, and vegetables components are not eligible for CN labels.

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 MMA, grains, and vegetables components. CN-labeled breaded chicken nuggets may list contributions to the MMA and grains components.

Benefits of using CN-labeled products

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 when the processed product is used according to the manufacturer's instructions. CN labels also simplify cost comparisons of similar products.

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Considerations for CN-labeled products

The CN crediting statement declares the quantities of the creditable food items in a processed food that can be used to meet the meal pattern requirements. However, it does not provide any other guarantees. For example, the CN label does not indicate that:

- the product is healthier, more nutritious, or of a higher quality than a similar non-CN labeled product; or
- the product is safer to eat, or free of pathogens or allergens.

CACFP facilities must obtain additional information to determine if a CN-labeled product meets any preferred or required nutrition standards.

CN-labeled products are not required

The USDA does not require that manufacturers make CN-labeled products or that schools and institutions participating in the Child Nutrition Programs purchase foods with CN labels. Purchasing decisions are at the discretion of the local school or institution. Schools and institutions that require CN-labeled products must clearly state this information in their purchasing specifications.

Identifying CN Labels

The CN label is found on the product packaging and will contain the required elements below.

- The federally required label featuring the product name, inspection legend, ingredient statement, name and address of manufacturer or distributor, and net weight.
- The CN logo, which is a distinct border with “CN” on each side surrounding the meal pattern contribution statement.
- The meal pattern contribution statement, which provides specific crediting information for the serving.
- The USDA FNS authorization statement: “Use of this logo and statement authorized by the Food and Nutrition Service, USDA.”
- A unique six-digit product identification number, which is assigned by the USDA’s AMS.
- The month and year of AMS approval or the NOAA SIP approval, which is listed after the FNS authorization statement. The date is written using numbers to represent the month/year of final label approval (refer to [“Dates on CN Labels”](#) in this document).

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Figure 1 shows an example of a CN label and the required elements. For detailed guidance on CN labels and the required elements, refer to What's in a Meal Module 6: Meal Pattern Documentation Part B 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](#)

Figure 1. Sample CN label



- | | |
|--|-----------------------------------|
| 1. Product name | 6. FNS authorization statement |
| 2. Ingredients statement | 7. Month and year of AMS approval |
| 3. CN logo | 8. Net weight |
| 4. Meal pattern contribution statement | 9. Company signature/address line |
| 5. Six-digit product identification number | 10. Inspection legend |



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USDA's CN Label Verification System

The USDA's CN Label Verification System assists CACFP facilities and state agency reviewers with verifying the status of a CN label, such as the crediting information, CN number, and approval date, and the validity of a CN label copied with a watermark. For example, if a manufacturer has not updated the authorization date on the CN label, the CN Label Verification Report would include the updated "Valid Until" date of the label.

The CN Label Verification System publishes two monthly reports: 1) a list of products with valid CN labels (CN Label Verification Report); and 2) a list of contact information for manufacturer, authorized to produce CN-labeled products (CN Label Manufacturers Report). These lists are available on the USDA's [Authorized Labels and Manufacturers](#) webpage.

Dates on CN Labels

Once authorized by the USDA, CN labels are valid for five years under the condition that the manufacturer remains an authorized CN producer and the product formulation does not change. The date printed on the CN label is the original date of authorization or the date of the most recent authorization for use of that CN label. This is different from the "Valid Until" date shown on the CN Label Verification Report, which indicates when the current authority to use the label expires.

Manufacturers may choose to leave the original authorization date on the label when they receive reauthorization of their CN label so that label inventories do not go to waste. For example, if a CN label was originally authorized on February 15, 2024, it is valid until February 15, 2029. The manufacturer may resubmit the same product for reauthorization of the CN label. If reauthorization is granted, the "Valid Until" date is updated to five years from the most recent date of authorization on the CN Label Verification Report, but the date on the CN label may remain as "02/24."



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Meal Pattern Contribution of CN Labels

CN labels indicate the meal pattern contribution of the MMA component and other meal components (such as grains, vegetables, and fruits) in one serving of the product. CN labels do not include milk component crediting. Guidance for each meal component on a CN label is summarized below.

MMA contribution

A CN-labeled product lists the serving's MMA contribution in oz eq. An oz eq is a weight-based unit of measure for the grains component and MMA component.

Grains contribution

A CN-labeled product that contains a grain portion includes one of the crediting terms below to indicate if the product credits as whole grain-rich (WGR) or enriched.

- The term “oz eq grains” on the CN label indicates that the product meets the WGR criteria. WGR means that the grain portion of a product is at least 50 percent whole grain with the remaining grains being enriched.
- The term “oz eq grains (enriched)” means that the grain portion of the product is primarily made from enriched grains. These products credit toward the grains component but do not meet the WGR criteria.

As a reminder, CACFP menus must offer at least one serving of WGR grains per day.

Vegetables contribution

A CN-labeled product that contains vegetables lists the serving's contribution to the five vegetable subgroups in cups (dark green, red/orange, beans, peas, and lentils, starchy, and other). The CACFP meal patterns do not require the vegetable subgroups. However, the USDA's [CACFP best practices](#) recommend that CACFP menus include at least one serving per week of each vegetable subgroup. For more information, refer to the CSDE's resource, [Vegetable Subgroups in the Child and Adult Care Food Program](#).

Note: As of July 1, 2024, the USDA final rule, [Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans](#), changes the previous references in the regulations for Child Nutrition Programs from “legumes (beans and peas)” to “beans, peas, and lentils.” Manufacturers may continue to use the term “legumes vegetables” on approved CN labels. At the time of application renewal or resubmission, manufacturers must update the term to “beans, peas, and lentils.”

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Fruits contribution

A CN-labeled product that contains fruit lists the serving's contribution to the fruits component in cups.

Acceptable Documentation

Acceptable and valid documentation for a CN label includes any of the documents below.

1. The original CN label from the product carton.
2. A photocopy or photograph of the CN label shown attached to the original product carton. CN labels that are photocopied or photographed must be visible and legible.
3. A CN label copied with a watermark displaying the product name and CN number provided by the vendor and the bill of lading (invoice).

CACFP facilities must maintain this documentation on file with all other menu records (refer to "[Storing CN Labels](#)" in this document). For additional guidance on accepting product documentation, refer to the CSDE's [Accepting Processed Product Documentation in the Child and Adult Care Food Program](#).

CN labels with a watermark

Manufacturers may use a CN label with a watermark (refer to figure 2) when the CN logo and contribution statement are on separate product information from the actual product carton. Manufacturers may provide a watermarked CN label during the bidding process. Original CN labels on product cartons will not have a watermark.

Product information on a watermarked CN label can be changed. The USDA encourages CACFP facilities to verify that the watermarked CN label came from a product that was purchased and accurately reflects that product.

A watermarked CN label is acceptable documentation for the Administrative Review of the CACFP if it is attached to a bill of lading (invoice) that contains the product name and CN number (refer to figures 2 and 3). Valid and acceptable documentation for the watermarked CN label includes 1) a hard copy of the CN label copied with a watermark displaying the product name and CN number provided by the vendor; or 2) an electronic copy of the CN label with a watermark displaying the product name and CN number provided by the vendor. For more

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information, refer to [USDA Memo SP 05-2025](#), [CACFP 04-2025](#), and [SFSP 02-2025](#): *Guidance for Accepting Processed Product Documentation for Meal Pattern Requirements.*

Figure 2. Sample CN Label with a watermark



Figure 3. Sample bill of lading (invoice) for a CN-labeled product

Chicken Wok Company
1234 Kluck Street
Poultry, PA, 12345
123-456-7890

Bill of Lading (Invoice)

Invoice Number: 1234
Date: December 22, 2022

Bill to:	Ship to:
ABC School District 1234 Anystreet Anytown, CT 01234	ABC School District 1234 Anystreet Anytown, CT 01234

Item description and code number	Unit	Quantity	Unit price	Amount
Chicken Stir-fry Bowl, CN #000000	each	200	\$1.50	\$300.00
Total:				\$300.00

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Storing CN Labels

CACFP facilities must maintain CN labels and crediting documentation on file in accordance with the records retention requirements for the CACFP (refer to the CSDE's resource, [Records Retention Requirements for the Child and Adult Care Food Program](#)). This documentation must be current and will be reviewed by the CSDE during the Administrative Review of the CACFP.

The CSDE recommends maintaining original CN labels from the product carton in a designated binder or folder for easy reference. Digital photos and scans of CN labels should be stored in an easily accessible electronic folder.

Guidance and Training for CN Labels

The requirements for crediting documentation for processed foods are defined in [USDA Memo SP 05-2025, CACFP 04-2025, SFSP 02-2025: Guidance for Accepting Processed Product Documentation for Meal Pattern Requirements](#). For additional guidance on accepting product documentation, visit the "Crediting Commercial Processed Products" section of the CSDE's [Crediting Foods in CACFP Child Care Programs and Crediting Foods in CACFP Adult Day Care Centers](#) webpages.

Training on the requirements for CN labels and PFS forms is available in Module 6: Meal Pattern Documentation Part B – Crediting Commercial Processed Products 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](#), and the Institute of Child Nutrition's online training, [FBG Module 3: Product Formulation Statements](#).



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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 C: The USDA Child Nutrition Labeling Program (USDA's Food Buying Guide for Child Nutrition Programs):

https://foodbuyingguide.fns.usda.gov/Content/TablesFBG/USDA_FBG_Appendix_C.pdf

Authorized Manufacturers and Labels (USDA webpage):

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

CACFP Meal Pattern Updates (CSDE's CACFP webpage):

<https://portal.ct.gov/sde/nutrition/child-and-adult-care-food-program#MealPatternUpdates>

Child Nutrition (CN) Labeling Manual (USDA):

<https://fns-prod.azureedge.us/sites/default/files/resource-files/child-nutrition-labeling-manual.pdf>

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>

CN Labeling Program (USDA webpage):

<https://www.fns.usda.gov/cn/labeling-program>

Crediting Documentation for the Child Nutrition Program (CSDE webpage):

<https://portal.ct.gov/sde/nutrition/crediting-documentation-for-the-child-nutrition-programs>

FBG Module 3: Product Formulation Statements (Institute of Child Nutrition):

<https://theicn.docebosaa.com/learn/courses/139/fbg-module-3-product-formulation-statements-pfs>

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Guide to Menu Documentation for the Child and Adult Care Food Program (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/cacfp/mealpattern/guide_cacfp_menu_documentation.pdf

Presentation: CN Labels and Product Formulation Statements (USDA):

<https://theicn.org/resources/930/march-2016/109876/manufacturers-product-formulation-statement-pfs03-31-16.pdf>

Records Retention Requirements for the Child and Adult Care Food Program (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/cacfp/forms/records_retention_cacfp.pdf

Summary of Final Rule Updates to the Meal Patterns for the CACFP (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/cacfp/mealpattern/summary_final_rule_cacfp_meal_patterns.pdf

USDA Final Rule: Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans (89 FR 31962):

<https://www.federalregister.gov/Documents/2024/04/25/2024-08098/Child-Nutrition-Programs-Meal-Patterns-Consistent-With-The-2020-2025-Dietary-Guidelines-For>

USDA Memo SP 05-2025, CACFP 04-2025, and SFSP 02-2025: Guidance for Accepting Processed Product Documentation for Meal Pattern Requirements:

<https://www.fns.usda.gov/cn/labeling/guidance-accepting-processed-product-documentation>

What's in a Meal Module 6: Meal Pattern Documentation Part B – Crediting Commercial Processed Products (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>

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For more information, visit the CSDE's [Crediting Foods in CACFP Child Care Programs](#) webpage and [Crediting Foods in CACFP Adult Day Care Centers](#) 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/using_cn_labels_cacfp.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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