Accepting Processed Product Documentation in the School Nutrition Programs

This guidance applies to the U.S. Department of Agriculture's (USDA) meal patterns for grades K-12 and preschool (ages 1-5) in the National School Lunch Program (NSLP), School Breakfast Program (SBP), and Afterschool Snack Program (ASP) of the NSLP. The Seamless Summer Option (SSO) of the NSLP follows the NSLP, SBP, and ASP meal patterns.

For information on the meal patterns for the school nutrition programs, visit the Connecticut State Department of Education's (CSDE) Meal Patterns for Grades K-12 in School Nutrition Programs webpage, Meal Patterns for Preschoolers in School Nutrition Programs webpage, and the "Meal Patterns and Crediting" section of the ASP webpage. For information on the crediting requirements, visit the CSDE's Crediting Foods in School Nutrition Programs webpage and Crediting Documentation for the Child Nutrition Programs webpage.

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Required Documentation for Commercial Processed Products

The meal patterns for the school nutrition programs require specific portions of five meal components for each meal and grade group, which include meats/meat alternates (MMA), grains, vegetables, fruits, and milk. The USDA requires that school food authorities (SFAs) must be able to document how processed foods credit toward these meal components in reimbursable meals and afterschool snacks.

Commercial processed products are commercially prepared foods and beverages with added ingredients. Some examples include:

- combination foods that contain more than one meal component, e.g., pizza, breaded chicken nuggets, cheese ravioli, hummus and other bean dips, fruit and yogurt smoothies, fruit-filled pastries, and trail mixes with dried fruits and nuts;
- foods with added liquids, binders, and extenders, e.g., deli meats, hotdogs, and sausages (refer to the CSDE's resources, *Crediting Deli Meats in the School Nutrition Programs* and *Crediting Commercial Meat/Meat Alternate Products in the School Nutrition Programs*);
- dried meat, poultry, and seafood products, e.g., jerky and summer sausages;
- foods that are alternate protein products (APPs) or contain APPs (refer to the CSDE's resource, *Requirements for Alternate Protein Products in the School Nutrition Programs*);
- fruits and vegetables with added ingredients, e.g., breaded onion rings, hash brown patties, coleslaw, and dried soup mix; and
- whole grain-rich (WGR) or enriched grain products that contain noncreditable grains (e.g., oat fiber, corn fiber, wheat starch, corn starch, and modified food starch, including potato, legume, and other vegetable flours), such as muffins, crackers, breakfast cereals, and grain-based-desserts like cookies, graham crackers, granola bars, and pastries.

These types of foods require specific documentation to credit toward the meal components of the school meal patterns. This documentation must be obtained prior to purchasing, serving, and claiming the food product in reimbursable meals and afterschool snacks.

SFAs are ultimately responsible if a menu does not meet the meal pattern requirements. The USDA requires crediting documentation to demonstrate how food items meet the requirements of the meal pattern regulations.

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Acceptable Documentation

The acceptable types of crediting documentation for processed foods include any of the documents below.

- **Child Nutrition (CN) label:** A CN label is a USDA-approved statement that clearly identifies the contribution of a commercial product toward the meal pattern requirements. CN labels are available only for main dish entrees that contribute at least ½ ounce equivalent (oz eq) of the MMA component, but they often include crediting information for other meal components that are part of the product, such as vegetables, fruits, and grains. Allowable CN label documentation includes 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; or 3) a CN label copied with a watermark displaying the product name and CN number provided by the vendor, attached to the bill of lading (invoice). For more information on CN labels, refer to the CSDE's resource, *Using Child Nutrition (CN) Labels in the School Nutrition Programs*.

- **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. The PFS must be signed by an official of the manufacturer and state the amount of each meal component contained in one serving of the product. For more information on PFS forms, refer to the CSDE's resource, *Using Product Formulation Statements in the School Nutrition Programs*.

> A PFS is required for all commercial processed products without a CN label that are not listed in the USDA's *Food Buying Guide for Child Nutrition Programs* (FBG). The USDA requires that SFAs must obtain and verify the PFS for accuracy prior to purchasing, serving, and claiming the food product in reimbursable meals and afterschool snacks.

Commercial processed products without a CN label or PFS that are not listed in the FBG do not credit in school meals and afterschool snacks. For more information on crediting documentation, visit the CSDE's Crediting Documentation for the Child Nutrition Programs webpage.

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Storing Documentation

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

SFAs must maintain all crediting must maintain all CN labels, PFS forms, and other crediting documentation on file in accordance with the records retention requirements for the school nutrition programs. For more information, refer to the CSDE's resource, *Records Retention Requirements for the School Nutrition Programs*. This documentation must be current and will be reviewed by the CSDE during the Administrative Review of the school nutrition programs.

Overview of Child Nutrition (CN) Labels

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 Administration (FNA) 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. 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.

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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.

Acceptable documentation for CN labels

Acceptable and valid documentation for a CN label includes any of the following: 1) the original CN label from the product carton; 2) photocopy or photograph of the CN label shown attached to the original product carton (must be visible and legible); and 3) CN label copied with a watermark displaying the product name and CN number provided by the vendor, with the bill of lading (invoice). SFAs must maintain this documentation on file with all other menu records (refer to "Storing Documentation" in this document).

Overview of Product Formulation Statement (PFS) Forms

A PFS is a document developed by manufacturers that provides specific information about how a product credits toward the USDA's meal patterns for the Child Nutrition Programs. These forms generally include a detailed explanation of what the product contains and indicate the amount of each ingredient in the product by weight. Unlike CN labels, the information on PFS forms might vary among manufacturers because these forms are not reviewed, approved, or monitored by the USDA.

Requirements for PFS forms

A PFS is an official certified document of the company. PFS forms 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.

PFS forms must include specific elements to be acceptable as crediting documentation for the school nutrition programs. The required elements include the product name, product code; serving or portion size; creditable ingredients; and information to demonstrate how creditable ingredients contribute to the USDA's meal patterns for the school nutrition programs. The product's label with the ingredients statement must also be attached.

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 visit the USDA's Child Nutrition Programs: Tips for Evaluating a Manufacturer's Product Formulation Statement webpage. Guidance on how to review a grain PFS is available in the CSDE's resource, *When Commercial Grain Products Require a Product Formulation Statement to Credit in the School Nutrition Programs*.

Reviewing PFS forms for accuracy

The USDA requires that SFAs are responsible for verifying that the calculations and meal pattern contribution statement on a manufacturer's PFS are accurate. Prior to purchasing, serving, and claiming the food product in reimbursable meals and afterschool snacks, SFAs must review the PFS to ensure that it includes each required element and that 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.

Guidance and Training for Crediting Documentation

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 "Accepting Product Documentation" section of the CSDE's Crediting Documentation for the Child Nutrition Programs webpage.

Training on the requirements for CN labels and PFS forms is available in Module 8: Meal Pattern Documentation for Crediting Commercial Processed Products of the CSDE's training program, *What's in a Meal: Meal Patterns for Grades K-12 in the School Nutrition Programs*.

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Resources

Accepting Processed Product Documentation in the School Nutrition Programs (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

Child Nutrition Authorized Labels and Manufacturers (USDA webpage):
https://www.fna.usda.gov/cn/labeling/authorized-labels-manufacturers

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

CN Labeling Program (USDA webpage):
https://www.fna.usda.gov/cn/labeling

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

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

Crediting Summary Charts for the Meal Patterns for the School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/crediting_summary_charts_snp.pdf

Food Buying Guide for Child Nutrition Programs (USDA):
https://www.fna.usda.gov/tn/fbg

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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

Records Retention Requirements for the School Nutrition Programs (CSDE): https://portal.ct.gov/-/media/sde/nutrition/nslp/records_retention_snp.pdf

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 School Nutrition Programs (CSDE): https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/cn_labels_snp.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 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

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, visit the CSDE's Crediting Foods in School Nutrition Programs webpage 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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