Using Child Nutrition (CN) Labels 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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Using Child Nutrition (CN) Labels in the School Nutrition Programs

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 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 ounce equivalent (oz eq) of the meats/meat alternates (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 food that is not CN labeled;
- is safer to eat, or free of pathogens or allergens; or
- complies with the USDA's Buy American requirement.

School food authorities (SFAs) must obtain additional information to determine if a CN-labeled product meets the Buy American requirements and 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

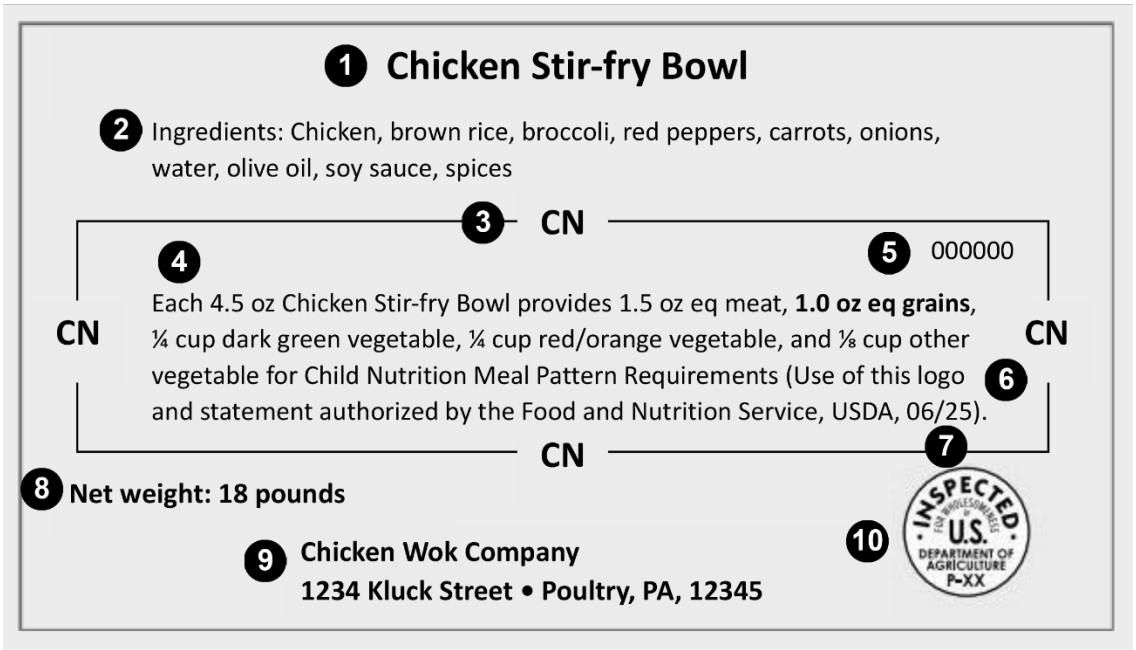
The CN label is found on the product packaging and will contain the required elements below.

- 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." **Note:** In June 2026, the USDA Food and Nutrition Service (FNS) changed to the Food and Nutrition Administration (FNA). The old FNS wording will still be on CN labels while the USDA transitions these documents to the new name.
- 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).

Figure 1 shows an example of a CN label and the required elements.

Figure 1. Sample CN label



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

Using Child Nutrition (CN) Labels in the School Nutrition Programs

USDA's CN Label Verification System

The USDA's CN Label Verification System assists SFAs 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 "Expiration" 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 manufacturers authorized to produce CN-labeled products (CN Label Manufacturers Report). These lists are available on the USDA's Child Nutrition 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 "Expiration" 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 "Expiration" 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.

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 for the NSLP, SBP, and ASP meal patterns for grades K-12. 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.

The NSLP, SBP, and ASP meal patterns for grades K-12 require that at least 80 percent of the grains offered in breakfast, lunch, and afterschool snack menus must be WGR, based on the total oz eq of the weekly offered grains. The NSLP, SBP, and ASP preschool meal patterns require at least one serving of WGR grains per day, between all meals and afterschool snacks served to children.

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). Only the NSLP meal patterns for grades K-12 require the vegetable subgroups. However, SFAs are encouraged to offer the vegetable subgroups in other meals and afterschool snacks. For additional guidance, refer to the CSDE's resource, *Vegetable Subgroups in the National School Lunch Program*.

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."

Fruits contribution

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



Using Child Nutrition (CN) Labels in the School Nutrition Programs

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).

SFAs 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 resource, *Accepting Processed Product Documentation in the School Nutrition Programs,* and visit the "Accepting Product Documentation" section of the CSDE's Crediting Documentation for the Child Nutrition Programs webpage.

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 SFAs 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 school nutrition programs 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 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

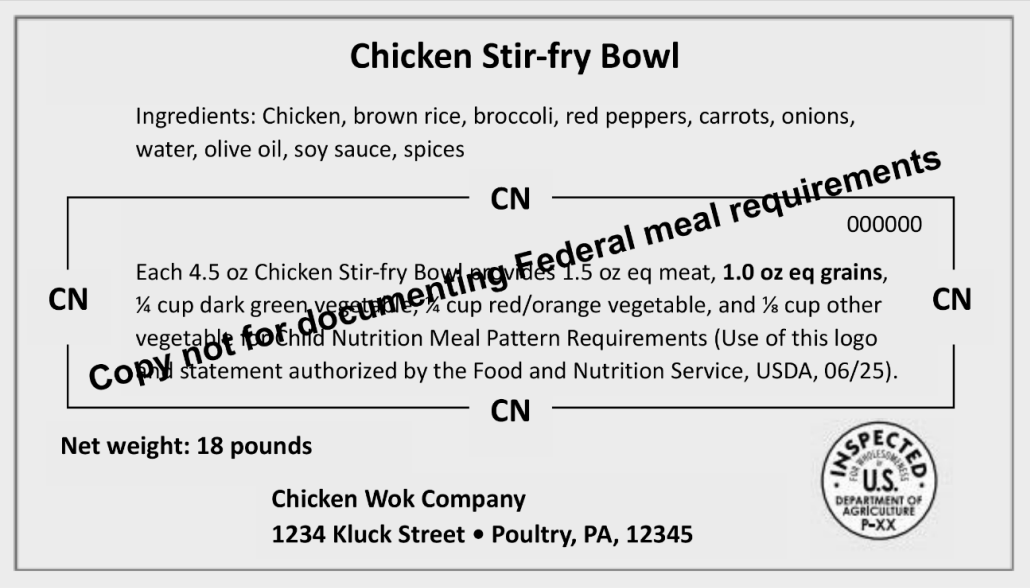
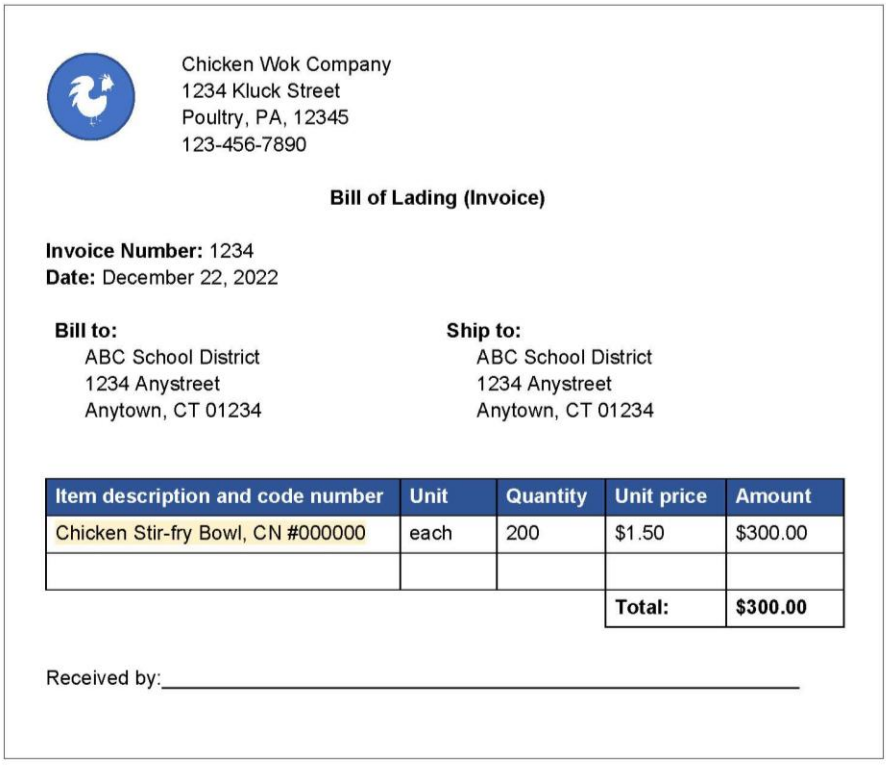


Figure 3. Sample bill of lading (invoice) for a CN-labeled product



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:
ABC School District
1234 Anystreet
Anytown, CT 01234

Ship to:
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**

Received by:_____

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Storing CN Labels

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.

SFAs must maintain all CN labels 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.

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*. Additional guidance on the crediting documentation requirements is available on the CSDE's Crediting Documentation for the Child Nutrition Programs webpage.

Training on the requirements for CN labels 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*.

Using Child Nutrition (CN) Labels in the School Nutrition Programs

Resources

Accepting Processed Product Documentation in the School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/accepting_processed_product_documentation_snp.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

Child Nutrition (CN) Labeling Manual (USDA):
https://www.fna.usda.gov/cn/labeling/manual

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

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

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

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

USDA Final Rule: Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans (89 FR 31962):
https://www.fna.usda.gov/cn/fr-042524

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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

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

Using Child Nutrition (CN) Labels in the School Nutrition Programs

For more information, visit the CSDE's Crediting Documentation for the Child 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/cn_labels_snp.pdf.

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Using Child Nutrition (CN) Labels in the School Nutrition Programs

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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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