Crediting Deli Meats 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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Crediting Deli Meats in the School Nutrition Programs

Overview of Crediting Requirements

Deli meats (such as turkey, chicken, ham, roast beef, salami, and bologna) credit as the MMA component in the meal patterns for the school nutrition programs. The amount of deli meat that provides 1 ounce equitant (oz eq) of the MMA component depends on the product's ingredients. The required serving can vary greatly between different brands and types of deli meats.

- **100 percent meat:** Products that are 100 percent meat without added liquids (e.g., water or broth), binders, and extenders credit on an ounce-per-ounce basis (actual serving weight). For example, 1 ounce of deli meat that is 100 percent meat credits as 1 oz eq of the MMA component.

- **Added liquids, binders, and extenders:** Products that contain added liquids, binders, and extenders credit based on the percentage of meat in the product formula. A 1-ounce serving of these products does not credit as 1 oz eq of the MMA component. The crediting depends on the amount of meat per serving, excluding added ingredients. For example, to credit as 1 oz eq of the MMA component might require 1.6 ounces of one brand of deli meat and 2.3 ounces of another brand of deli meat.

School food authorities (SFAs) must ensure that the serving of deli meat provides the correct amount of the MMA component being credited toward the reimbursable meal or afterschool snack.



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Liquids, Binders, and Extenders

Products with added liquids, binders, and extenders cannot credit as the MMA component without a CN label or PFS that states the amount of the MMA component per serving. Menu planners must review product labels and ingredients to determine if commercial products contain added liquids, binders, and extenders. Binders and extenders are defined by the USDA's regulations for the Food Safety and Inspection Service (FSIS) (9 CFR 318.7).

Examples of binders and extenders

Binders and extenders are defined by the USDA's regulations for the Food Safety and Inspection Service (FSIS) (9 CFR 318.7). The list below indicates some examples

- Agar-agar
- Algin (a mixture of sodium alginate, calcium carbonate and calcium gluconate/lactic acid)
- Bread
- Calcium-reduced dried skim milk
- Carboxymethyl cellulose (cellulose gum)
- Carrageenan
- Cereal
- Dried milk
- Dry or dried whey
- Enzyme (rennet) treated calcium-reduced dried skim milk and calcium lactate
- Gums, vegetable
- Isolated soy protein (APP)
- Locust bean gum
- Methyl cellulose
- Modified food starch
- Reduced lactose whey
- Reduced minerals
- Sodium caseinate
- Soy flour (APP)
- Soy protein concentrate (APP)
- Starchy vegetable flour
- Tapioca dextrin
- Vegetable starch
- Wheat gluten
- Whey
- Whey protein concentrate (APP)
- Xanthan gum

APPs in the list above are indicated with "(APP)" after the ingredient name. Commercial products may contain APPs if they meet the USDA's APP requirements. For more information, refer to the CSDE's resource, *Requirements for Alternate Protein Products in the School Nutrition Programs*.

Examples of commercial products with added liquid, binders, and extenders

The ingredients statements below show some examples of commercial turkey breast products that contain added liquid, binders, and extenders (indicated in *italics*).

- Ingredients: Turkey breast, *water, modified cornstarch*, contains less than 2% of sodium lactate, salt, sugar, sodium phosphates, *carrageenan*, natural flavor, sodium diacetate, potassium chloride, sodium ascorbate, sodium nitrite, caramel color.

- Ingredients: Turkey breast meat, *turkey broth*, contains 2% or less salt, sugar, *carrageenan*, sodium phosphate, sodium acetate, sodium diacetate, flavoring.

To credit these products in reimbursable meals and afterschool snacks, SFAs must obtain a CN label or PFS indicating the oz eq of MMA per serving.





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Developing Recipes for Menu Items with Deli Meats

Different brands and types of deli meat credit differently. To ensure proper crediting, SFAs should develop standardized recipes for menu items that contain deli meats, such as sandwiches and other entrees.

These standardized recipes should indicate the deli meat's contribution to the MMA component based on the specific weight of a specific brand. To make portioning simple for food service staff and ensure that the serving provides the proper crediting amount, round up the weight of the deli meat in the standardized recipe to the nearest ¼ ounce. For example, the standardized recipe should list 1.2 ounces of deli meat as 1.25 ounces and 1.6 ounces of deli meat as 1.75 ounces.

If the SFA makes the same food item using different brands of deli meats that credit differently, the standardized recipe should include the specific weight of each brand.

- **Example:** A school makes a turkey sandwich using either ABC brand turkey breast or XYZ brand turkey breast, depending on product availability and price. The school's standardized recipe should include the required weight of ABC brand for 1 oz eq and the required weight of XYZ brand for 1 oz eq. Alternatively, the SFA could also choose to develop a separate standardized turkey sandwich recipe for each brand of deli meat.

For information on standardized recipes, visit the "Standardized Recipes" section of the CSDE's Crediting Documentation for the Child Nutrition Programs webpage. Training on standardized recipes is available in Module 7: Meal Pattern Documentation for School Menus of the CSDE's training program, *What's in a Meal: Meal Patterns for Grades K-12 in the School Nutrition Programs*.

Comparing Cost

Determining the cost per oz eq of MMA helps SFAs decide if the required meal pattern serving for a specific brand of deli meat is reasonable and cost effective. The deli product with the lowest cost per pound might not be the least expensive. Considering the cost per oz eq of the MMA component instead of the cost per ounce of meat provides a more accurate reflection of the product's cost in reimbursable meals and afterschool snacks.

The table below shows a sample cost comparison of two deli meat products. Products with added liquids, binders, extenders require a CN label or PFS to document the MMA oz eq per serving (refer to "Required Crediting Documentation for Deli Meats" in this document). SFAs must obtain the oz eq contribution of the deli meat from the manufacturer's PFS.

Table 1. Cost comparison of sample deli meats

Food Item	Price per pound	Price per ounce	1 oz eq of MMA	Cost of 1 oz eq of MMA
Sample product A: Deli meat with liquids, binders, or extenders	$4.99	$ .31	1.7 ounces	$ .53
Sample product B: Deli meat without liquids, binders, or extenders	$6.99	$ .44	1 ounce	$ .44

Sample product A (deli meat with liquids, binders, or extenders) costs $2 less per pound than sample product B (deli meat without liquids, binders, or extenders). However, when the SFA compares the cost based on 1 oz eq of the MMA component, a serving of sample product A costs 53 cents and a serving of sample product B costs 44 cents. Sample product A requires almost twice the weight of sample product B to provide 1 oz eq of the MMA component because of the added liquids, binders, and extenders.

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Required Crediting Documentation for Deli Meats

SFAs must obtain appropriate crediting documentation that states the oz eq of the MMA component per serving for all deli meats that contain added liquids, binders, and extenders. Acceptable documentation includes 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. 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 and 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 pattern 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*. For guidance on how to review a PFS, visit the USDA's Child Nutrition Programs: Tips for Evaluating a Manufacturer's Product Formulation Statement webpage.

Deli meats without a CN label or PFS cannot credit in reimbursable meals and afterschool snacks unless they are listed in the USDA's *Food Buying Guide for Child Nutrition Programs* (FBG).

> A PFS is required for all deli meats without a CN label that are not listed in the FBG. The USDA requires that SFAs must obtain and verify the PFS for accuracy prior to purchasing, serving, and claiming the product in reimbursable meals and afterschool snacks.

For more information on crediting documentation, refer to the CSDE's resource, *Accepting Processed Product Documentation in the School Nutrition Programs*, 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.

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*.

Storing crediting documentation

SFAs must maintain all CN labels, PFS forms, standardized recipes, 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.

Considerations for Reducing Choking Risks for Young Children

Children younger than 4 are at the highest risk of choking. Large chunks or cubes of deli meats are choking hazards. Consider children's age and developmental readiness when deciding how to offer deli meats in preschool menus and modify foods and menus as appropriate. For additional guidance, visit the "Choking Prevention" section of the CSDE's Food Safety for Child Nutrition Programs webpage.

Crediting Deli Meats 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

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

Crediting Commercial Meat/Meat Alternate Products in the School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/credit_commercial_mma_snp.pdf

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

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

Meats and Meat Alternates (CSDE's Crediting Foods in School Nutrition Programs webpage):
https://portal.ct.gov/sde/nutrition/crediting-foods-in-school-nutrition-programs/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

Requirements for Alternate Protein Products in the School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/app_requirements_snp.pdf

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

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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

USDA Memo SP 21-2019, CACFP 08-2019, and SFSP 07-2019: Crediting Shelf-Stable, Dried and Semi-Dried Meat, Poultry, and Seafood Products in the Child Nutrition Programs: https://www.fna.usda.gov/cn/crediting-shelf-stable-dried-and-semi-dried-meat-poultry-and-seafood-products-child-nutrition

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 7: Meal Pattern Documentation for School Menus (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#module7

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

What's in a Meal Module 10: Meats/Meat Alternates Component (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#module10

Crediting Deli Meats in the School Nutrition Programs

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/credit_deli_snp.pdf.

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2. fax: (833) 256-1665 or (202) 690-7442; or
3. email: program.intake@usda.gov

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