Accepting Processed Product Documentation in the National School Lunch Program and School Breakfast Program

This guidance applies to meals for preschoolers (ages 1-4) and grades K-12 in the U.S. Department of Agriculture's (USDA) National School Lunch Program (NSLP), School Breakfast Program (SBP), Seamless Summer Option (SSO) of the NSLP, and Afterschool Snack Program (ASP) of the NSLP.



School food authorities (SFAs) must obtain acceptable documentation for all commercial food products used to meet the USDA's meal pattern requirements for school nutrition programs. For example, to credit a commercially prepared beef burrito as 2 ounce equivalents of the meat/meat alternates component, the manufacturer's documentation must indicate that one serving of the product contains 2 ounces of cooked lean meat. The Connecticut State Department of Education (CSDE) will review product documentation during the Administrative Review of the SFA's school nutrition programs.

Child Nutrition (CN) labels and product formulation statement (PFS) forms are the only acceptable types of documentation that SFAs can use to determine compliance of commercial products with the meal pattern requirements. Commercial products without a CN label or PFS cannot credit in school nutrition programs.



Child Nutrition (CN) Labels

- CN labels provide a warranty against audit claims when SFAs use the product according to the manufacturer's instructions.
- During an Administrative Review, SFAs may submit a CN label, or a photocopy or photograph of a valid CN label, as acceptable documentation of a product's contribution to the meal patterns. SFAs may photocopy CN labels that are laser printed on the product carton or cannot be easily removed, or may use a photograph of the CN label while it is still attached to the product carton. CN labels that are photocopied or photographed must be visible and legible.
- During the Administrative Review, the CSDE will not request a PFS when the SFA provides a valid CN label logo and crediting statement.

For more information, see the CSDE's handout, *Child Nutrition (CN) Labeling Program*, USDA Memo SP 11-2015 (v2), CACFP 10-2015 and SFSP 13-2015: *CN Labels Copied with a Watermark Acceptable Documentation*, and USDA Memo SP 27-2015, CACFP 09-2015 and SFSP 12-2015: *Administrative Review Process Regarding the Child Nutrition (CN) Label, Watermarked CN Label and Manufacturer's Product Formulation Statement*. The USDA's Authorized Labels and Manufacturers webpage lists approved CN-labeled products and manufacturers.

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Product Formulation Statements

- The PFS must be on signed company letterhead and must demonstrate how the processed product contributes to the meal pattern requirements.
- The USDA's Food Manufacturers/Industry webpage provides sample PFS templates for documenting the meat/meat alternates, grains, fruits, and vegetables components.
- Manufacturers may modify the USDA's PFS forms for various products that contribute to more
 than one meal component. For example, cheese pizza could have crediting information for the
 red/orange vegetable subgroup in addition to the meat/meat alternates and grains components.
 Manufacturers may use one PFS to document the crediting information for all meal components
 in a product.
- All creditable ingredients listed in the PFS must match a description in the USDA's Food Buying
 Guide for Child Nutrition Programs. The manufacturer must clearly identify how each component
 contributes to the meal pattern requirements.
- The PFS should verify that the product's meal pattern contribution is not greater than the serving size of the product. For example, a 2.2-ounce beef patty cannot credit for more than 2 ounce equivalents of the meat/meat alternates component.



The PFS should assure that the creditable components are visible in the finished product, such
as sausage links, beans, cheese, or peanut butter. The PFS must also specify the method for
crediting these items.

For more information, see the CSDE's handout, *Product Formulation Statements*, and the USDA's handout, *Tips for Evaluating a Manufacturer's Product Formulation Statement*.

Resources

Afterschool Snack Program (CSDE):

https://portal.ct.gov/SDE/Nutrition/Afterschool-Snack-Program

Afterschool Snack Program Handbook (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/ASP/ASPHandbook.pdf

Authorized Manufacturers and Labels (USDA webpage):

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

Child Nutrition (CN) Labeling Program (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/CNlabel.pdf

Child Nutrition Programs (CSDE webpage):

https://portal.ct.gov/SDE/Nutrition/Child-Nutrition-Programs

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CSDE Operational Memorandum No. 10-15: Guidance for Accepting Processed Product
   Documentation for Meal Pattern Requirements:
   https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Memos/OM2015/OM10-15.pdf
Food Buying Guide for Child Nutrition Programs (USDA):
   https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs
Food Manufacturers/Industry (USDA webpage):
   https://www.fns.usda.gov/cnlabeling/food-manufacturersindustry
Meal Patterns for Grades K-12 in School Nutrition Programs (CSDE webpage):
   https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-School-Nutrition-Programs
Meal Patterns for Preschoolers in School Nutrition Programs (CSDE webpage):
   https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-Preschoolers-in-School-Nutrition-
   Programs/Documents
Menu Planning Guide for Preschoolers in the NSLP, SBP, and ASP (CSDE):
   https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Preschool/MPGpreschool.pdf
Menu Planning Guide for School Meals for Grades K-12 (CSDE):
   https://portal.ct.gov/SDE/Nutrition/Menu-Planning-Guide-for-School-Meals
Product Formulation Statement for Grains: Ounce Equivalents (USDA):
   https://fns-prod.azureedge.net/sites/default/files/resource-
   files/PFS_Documenting_Grains_oz_eq.pdf
Product Formulation Statement for Meat/Meat Alternates (USDA):
   https://fns-prod.azureedge.net/sites/default/files/resource-
   files/PFS_Documenting_Meat_Meat_Alternate_Nov_2019.pdf
Product Formulation Statement for Vegetables and Fruits (USDA):
   https://fns-prod.azureedge.net/sites/default/files/resource-
   files/PFS_Documenting_Vegetables_Subgroups_Fruits.pdf
Product Formulation Statements (CSDE):
   https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/PFS.pdf
Reviewer's Checklist for Evaluating Manufacturer Product Formulation Statements for Meat/Meat
   Alternates (USDA):
   https://fns-prod.azureedge.net/sites/default/files/reviewer_checklist.pdf
Sample Completed Product Formulation Statement for Fruits (USDA):
   https://fns-prod.azureedge.net/sites/default/files/resource-files/PFSsamplefruits.pdf
Sample Completed Product Formulation Statement for Grains: Ounce Equivalents (USDA):
   https://fns-prod.azureedge.net/sites/default/files/resource-files/PFS_Sample_oz_eq.pdf
Sample Completed Product Formulation Statement for Vegetables (USDA):
   https://fns-prod.azureedge.net/sites/default/files/resource-files/PFSsamplevegetables.pdf
Tips for Evaluating a Manufacturer's Product Formulation Statement (USDA):
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https://fns-prod.azureedge.net/sites/default/files/resource-files/manufacturerPFStipsheet.pdf

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For more information, review the CSDE's guides, *Menu Planning Guide for School Meals for Grades K-12*, *Menu Planning Guide for Preschoolers in the NSLP, SBP, and ASP*, and *Afterschool Snack Program Handbook*, or contact the school nutrition programs staff in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This document is available at https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/AcceptDoc.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;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

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