



STATE OF MICHIGAN  
DEPARTMENT OF EDUCATION  
LANSING

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**FOOD SERVICE**

**ADMINISTRATIVE POLICY NO. 19  
SCHOOL YEAR 2014-2015**

**SUBJECT:** Acceptable Processed Product Documentation for Meal Pattern Requirements

**DATE:** May 8, 2015

Recently, the United States Department of Agriculture (USDA), Food and Nutrition Services (FNS) issued updated guidance for accepting processed product documentation, an important issue for operators of Child Nutrition (CN) programs. In an effort to clarify common issues related to inaccurate or misleading product literature, product labels, and fact sheets, USDA has issued the following memos:

- [TA 07-2010 \(v.3\) – Guidance for Accepting Processed Product Documentation for Meal Pattern Requirements \(November 26, 2014\)](#)<sup>i</sup>
- [SP 11-2015 \(v2\) – CN Labels copied with a Watermark Acceptable Documentation \(March 11, 2015\)](#)<sup>ii</sup>
- [SP 27-2015 – Administrative Review Process Regarding the Child Nutrition \(CN\) Label, Watermarked CN Label and Manufacturer’s Product Formulation Statement \(March 11, 2015\)](#)<sup>iii</sup>

Many manufacturers have developed specification sheets that provide end users with product information, product specifications, nutritional information, ingredients, allergen information, as well as preparation information. Some specification sheets also provide the CN number and CN statement. Oftentimes, the specification sheets do not meet the USDA crediting criteria. The only way for an operator to know if the processed product they are using correctly contributes toward meal pattern requirements is to use a CN labeled product or request a signed Product Formulation Statement (PFS) on manufacturer’s letterhead that demonstrates how the processed product contributes to the meal pattern requirements. The [Tip Sheet for Accepting Processed Product Documentation](#)<sup>iv</sup> provides information on acceptable documentation using CN Labels and PFS.

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## **CN Labels**

A CN Label is the gold standard for verifying the crediting of menu items. CN Labels:

- Provide an assurance that foods provide the stated contribution toward CN meal pattern requirements.
- Provide SFAs a warranty against audit claims when product is used according to the manufacturer's instructions.
- Ensure foods are produced under an approved Quality Control (QC) plan.

Acceptable and valid documentation for a CN Label includes:

1. The original CN Label from the product carton;
2. A photocopy of the CN Label shown attached to the original product carton; or
3. A photograph of the CN Label shown attached to the original product carton.

Acceptable documentation using a watermarked CN Label

A CN Label with a watermark is used when the CN logo and contribution statement are used on product information other than the actual product carton and is presented as a separate document.

If the original CN Label from the product carton, or the valid photograph or photocopy of the original CN label is not available, program operators may provide the Bill of Lading (invoice) containing the product name and:

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.

## **Product Formulation Statements**

When a processed product is purchased without a CN Label, a program operator may request a signed PFS on manufacturer's letterhead that demonstrates how the processed product contributes to the meal pattern requirements. Product Formulation Statement templates for documenting meat/meat alternates (m/ma), grains and fruit/vegetable components are available on the [CN Labeling website](#).<sup>v</sup>

- PFS must be on signed letterhead that demonstrates how the processed product contributes to the meal pattern.
- Creditable ingredients listed in the PFS must match a description in the [Food Buying Guide for School Meal Programs](#).<sup>vi</sup> PFS may be modified for various products contributing to more than one meal component. The crediting information for each meal component may be documented on the same PFS.
- The product's contribution to the meal pattern requirements is not greater than the serving size of the product.
- PFS should assure that the creditable components are in the finished product.

With this updated USDA guidance, in School Year (SY) 2015-2016 manufacturer specification sheets will not be acceptable documentation for meal component crediting. During the Administrative Review, only CN label or PFS will be accepted as documents to support compliance with meal pattern requirements. Please note that it is the responsibility of the SFA to verify and ensure accuracy of the documentation of the processed products that they use. For further information, refer to the information for food manufacturers/industry on the [CN Labeling website.](#)<sup>vii</sup>

Questions regarding this Administrative Policy may be directed to the School Nutrition Programs unit by e-mail to [MDE-SchoolNutrition@michigan.gov](mailto:MDE-SchoolNutrition@michigan.gov). Food Processors who have a National Processing Agreement (NPA) may contact their representative at USDA at [NPA@fns.usda.gov](mailto:NPA@fns.usda.gov) for further clarification.

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<sup>i</sup> <https://www.fns.usda.gov/sites/default/files/cn/TA07-2010v3os.pdf>

<sup>ii</sup> [https://www.fns.usda.gov/sites/default/files/cn/SP11v2\\_CACFP10\\_SFSP13-2015os.pdf](https://www.fns.usda.gov/sites/default/files/cn/SP11v2_CACFP10_SFSP13-2015os.pdf)

<sup>iii</sup> [https://www.fns.usda.gov/sites/default/files/cn/SP27\\_CACFP09\\_SFSP12-2015os.pdf](https://www.fns.usda.gov/sites/default/files/cn/SP27_CACFP09_SFSP12-2015os.pdf)

<sup>iv</sup> [https://www.fns.usda.gov/sites/default/files/cn/cnl\\_tipsheet-processedproduct.pdf](https://www.fns.usda.gov/sites/default/files/cn/cnl_tipsheet-processedproduct.pdf)

<sup>v</sup> <https://www.fns.usda.gov/cnlabeling/food-manufacturersindustry>

<sup>vi</sup> <https://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs>

<sup>vii</sup> <https://www.fns.usda.gov/cnlabeling/child-nutrition-cn-labeling-program>