



State of Arizona
Department of Education

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MEMORANDUM

TO: Sponsors of the National School Lunch Program

FROM: Mary Szafranski, Deputy Associate Superintendent
Arizona Department of Education, Health and Nutrition Services

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Arizona Department of Education, School Nutrition Programs

DATE: February 25, 2013

SUBJECT: Guidance for Accepting Processed Product Documentation for Meal Pattern Requirements (MPR)

Original Signed

This memorandum is being reissued with updated references and web links; it is otherwise unchanged. The purpose of this memorandum is to highlight common issues related to inaccurate or misleading product literature, product labels, and fact sheets; provide guidance about how product literature can be used to make purchasing decisions; and bring to your attention several sample Product Formulation Statements (PFS) that can be used to document a product's contribution to meal pattern requirements.

Fact sheets and product labels provide a way for food manufacturers to communicate with program operators about how their products may contribute to the meal pattern requirements for meals served under United States Department of Agriculture's Child Nutrition Programs. Complaints to the Food and Nutrition Service (FNS) about inaccurate or misleading product literature, product labels, and fact sheets have become common.

Schools and other program operators are not required to offer processed products with CN Labels; however, it is important to recognize that CN Labeled products ensure that the food provides the stated contribution toward CN meal pattern requirements. These foods are also processed under a Quality Control plan administered by the Agricultural Marketing Service or National Marine Fisheries Service using guidelines provided by FNS. CN Labels are only available for items that contribute to the meat/meat alternate component.



When purchasing a processed product without a CN Label, a program operator should have a completed and signed Product Formulation Statement on the manufacturer's letterhead that demonstrates how the processed product contributes to the meal pattern requirements. All CN Programs must also maintain files on nutrient information to meet the requirements of program regulations in 7CFR 210 and 220. If there is not a Nutrition Facts panel on the processed product, nutrient information must be obtained from the manufacturer.

Program operators are ultimately responsible if a menu does not fulfill meal pattern requirements; therefore, school food authorities (SFAs) must keep records of supporting documentation (original CN product label from the product carton or signed Product Formulation Statements) provided by the manufacturer. It is the program operator's responsibility to request and verify that the supporting documentation is accurate.

General Guidance for Reviewing Product Formulation Statements

An appropriate Product Formulation Statement will provide specific information about the product and show how the credit is obtained citing Child Nutrition Program resources and/or regulations. Specific policies for Alternate Protein Products and Food-based Menu Planning can be reviewed by visiting www.fns.usda.gov/cnd/cnlabeling/APPindustryfaqs.pdf.

- **Review Product Formulation Statements prior to purchasing processed products.** A *Reviewer's Checklist* for Evaluating a Manufacturer Product Formulation Statement (PFS) for Meat/Meat Alternate Products is available online at <http://www.fns.usda.gov/cnd/cnlabeling/foodmanufacturers.htm>

Product Formulation Statement templates for documenting the meat/meat alternate (M/MA) and the grains components are also available online at <http://www.fns.usda.gov/cnd/cnlabeling/foodmanufacturers.htm>.

These documents may be used to determine how a product credits toward the M/MA and/or grains component(s) of the meal pattern requirements. The PFS may need to be modified for various types of products available in the market place. For example, cheese pizza could have crediting information about the red/orange vegetable subgroup in addition to the M/MA and grain components.

- **Determine that creditable ingredients listed in the product formulation statement match a description in the 2001 Food Buying Guide for Child Nutrition Programs (FBG) available at:** www.fns.usda.gov/tn/resources/foodbuyingguide.html. If a Product Formulation Statement for a specific product claims to provide a higher credit than what is listed in the FBG, the statement must clarify all crediting ingredients, and demonstrate how the product provides that credit according to FNS regulations, guidance, or policy.

- **Verify that the credit a product contributes to meal pattern requirements is not greater than the serving size of the product.** For example, a 2.20 oz beef patty may not credit for more than 2.00 oz M/MA.

Assure that the Product Formulation Statement proves how the claimed credit was obtained and that creditable components are visible in the finished product. It is never acceptable for a manufacturer to simply state that the product provides a certain amount of credit for the Child Nutrition meal pattern. For example, fruit filled pancakes may not provide M/MA because it is not obvious how the product contributes to the M/MA component. In order for a product to claim M/MA contribution, the product must have a visible M/MA present such as a sausage link, beans, cheese, or peanut butter and the method for crediting these items should be outlined.

FNS has become increasingly aware of misleading and inaccurate information on product fact sheets. FNS encourages program operators to review product literature carefully since they are responsible if menus they serve do not meet meal pattern requirements. It is important to note that CN Labeled products provide program operators with a warranty against audit claims when the product is used according to the manufacturer's instructions. A Product Formulation Statement does not provide any warranty against audit claims. Any crediting information received from a manufacturer other than a valid CN label should be checked by the SFA or other program operator for accuracy prior to the item being included in the reimbursable meal.

Please contact your Child Nutrition Program Specialist at Arizona Department of Education (ADE) with questions concerning this guidance. Your specialist can be found at the top of your Sponsor Application on CNP Web Common Logon.

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