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The USDA Child Nutrition (CN) Labeling Program

About the Child Nutrition Labeling Program

What is the Child Nutrition Labeling Program?

The Child Nutrition (CN) Labeling Program is a voluntary Federal labeling program for Child Nutrition Programs (CNP). The CN label on a product communicates how the product contributes to CNP meal pattern requirements. CN labeled products provide CNP operators with a warranty against audit claims when the product is prepared according to the manufacturer's instructions.

Does the CN Labeling Program apply to food-based menu planning?

Yes, the CN Labeling Program applies to the food-based menu planning principles for the National School Lunch Program (NSLP), School Breakfast Program (SBP), Child and Adult Care Food Program (CACFP), and Summer Food Service Program (SFSP).

Who runs the program?

USDA, Agricultural Marketing Service (AMS) manages much of the CN Labeling Program in collaboration with three other Federal agencies: USDA's Food and Nutrition Service (FNS), Food Safety and Inspection Service (FSIS), and U.S. Department of Commerce's National Oceanic and Atmospheric Administration Seafood Inspection Program (NOAA SIP):

- FNS is responsible for regulations that govern the CN Labeling Program.
- AMS is responsible for approving CN label applications from commercial food processing firms and provides oversight on the quality control (QC) program and verification visits for all non-seafood products.
- NOAA SIP provides continuous on-site and audit-based grading and certification services for seafood items and oversees the CN label review and approval process for seafood products.
- FSIS provides inspection oversight for meat, poultry, and shell egg products to ensure plants are operating according to Federal food safety guidelines.

How does the program work?

The CN Labeling Program requires an evaluation of a product's formulation to determine its contribution toward CNP meal pattern requirements. It allows manufacturers to state this contribution on their labels. The existence of a CN label on a product provides CNP operators with a guarantee that the product contributes to the meal pattern requirements as printed on the product label.

Specific requirements include:

- Foods must be produced under Federal inspection, equal-to-Federal/State inspection, or Canadian inspection.
- Food processing firms must have an approved QC Program. Guidance for developing a QC Program and the Standard Operating Procedures (SOPs) for submitting a QC document for approval is available on the CN Labeling website at <https://www.fns.usda.gov/cn/labeling/food-manufacturersindustry>.
- Food processing firms must allow Federal personnel to perform verification services.

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Verification services ensure products are in compliance with the approved QC Programs. The SOPs for verification services are also available on the CN Labeling Web site at <https://www.fns.usda.gov/cn/labeling/food-manufacturersindustry>.

- AMS or NOAA SIP will conduct an evaluation of a product's formulation to determine its contribution toward meal pattern requirements. Once approved, the manufacturer may state the contribution by adding the approved CN label to the product's packaging.

What products can be CN labeled?

Main dish products contributing to the meats/meat alternates (M/MA) component of the meal pattern requirements are eligible for a CN label. Examples of CN labeled products made with M/MA include beef patties, cheese or meat pizzas, burritos, egg rolls, and breaded seafood portions. Main dish products contributing to the M/MA component that also contain grains, fruits, and/or vegetable components may include crediting for the additional components on the CN Label. Products contributing only to the grains, fruits and/or vegetables components are not eligible for the CN label.

A CN labeled product must:

- Contain a minimum of 0.50 ounce (oz.) equivalent M/MA per serving and
- Contain meat, poultry, seafood, and/or a meat alternate.

What must be declared on the CN label?

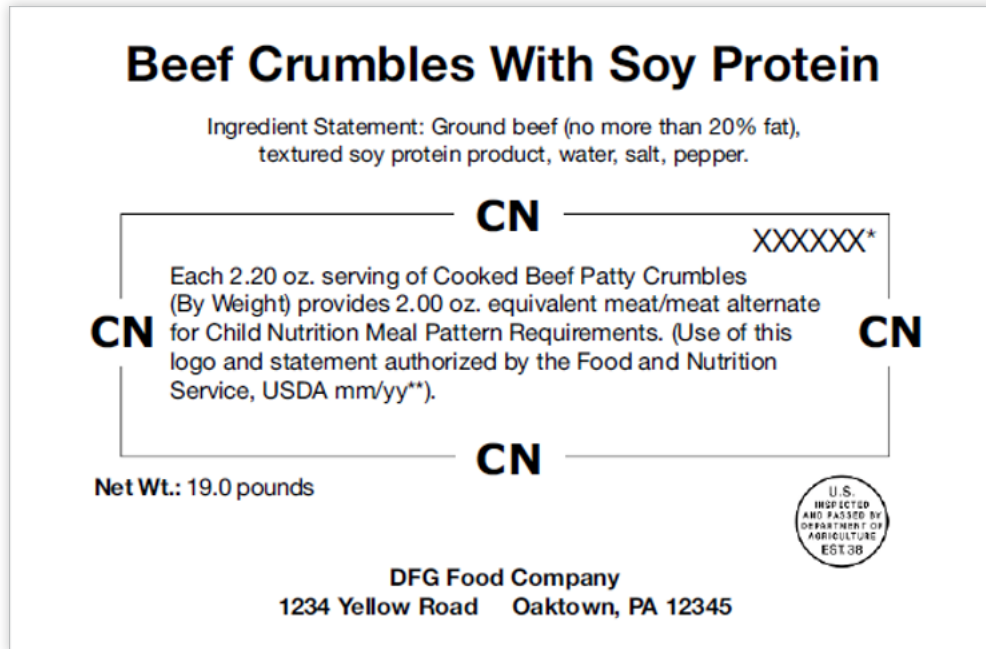
The contribution of the meal component(s) in the CN labeled product must be determined using yields in the "Food Buying Guide for Child Nutrition Programs" (FBG). The CN contribution statement must declare all contributions of a given product to the fullest extent possible. For example, if a formulation provides $\frac{1}{8}$ cup of red/orange vegetable from tomato paste, it must be declared in the CN contribution statement. Likewise, if a pizza crust contributes 2.00 oz. equivalent grains, then the CN contribution statement must declare the full amount of 2.00 oz. equivalent. The product formulation and CN label must be approved by the respective agency: NOAA SIP for seafood products, FSIS for meat, poultry, and shell egg products, and AMS.

What information is on a CN label?

A CN labeled product must contain the following on the product packaging:

- 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 has a distinct border;
- The meal pattern contribution statement;
- A unique 6-digit CN identification number (Note: All CN numbers are assigned by AMS);
- The USDA authorization statement; and
- The month and year of AMS or the NOAA SIP approval.

A sample CN label:



* The 6-digit CN identification number is assigned by CN Labeling office.

** Date is written using numbers to represent the month/year of label approval.

NOTE: The X's in the sample CN Logo are only used to demonstrate the placement of the CN identification number and the final date. If you receive a CN labeled product containing all X's (all zeroes, or non-number symbols) for the CN identification number, the label is not valid. If a CN label is not valid, FNS cannot provide a warranty for its use toward meal pattern requirements. See page C-4 for information on the CN Labeling Verification and Reporting System to assist you in identifying valid CN labels.

Are products served in CNPs required to be CN labeled?

There is no Federal requirement for products served in CNP to have a CN label. The decision to procure CN labeled products is made at the State or local level. If CN labeled products are desired, CNP operators must clearly state this in their purchasing specifications.

What are the advantages of using CN labeled products?

- A CN label statement clearly identifies the contribution of a product toward the meal pattern requirements. It protects CNP operators from exaggerated claims about a product.
- A CN label provides a warranty against audit claims, if the CN labeled product is used according to the manufacturer's directions.
- CN labels simplify cost comparisons of like products.

Do CN labeled products cost more?

CN labeled products may cost more. Special labeling requirements, application fees, inspection costs, and extra staff costs to monitor quality control may be contributing factors in CN labeled products costing more than similar non-CN labeled products. Keep in mind that cost comparison between two meat products should be based on the cost per ounce or pound of "contribution" to the meal pattern requirements, not on the product cost per ounce or pound.

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Are CN labeled products more nutritious than similar non-CN labeled products?

No. A CN label does not indicate that the CN product is healthier or more nutritious than a similar non-CN labeled product. The CN meal pattern contribution statement declares the quantities of the creditable meal components in a processed food. The quantity of creditable food is used to meet the meal pattern requirements.

Are CN labeled products of a higher quality than non-CN labeled products?

No. While a CN labeled product is guaranteed to contain a certain quantity of food, it does not indicate that the quality of the food is any different than a non-CN labeled food. Neither does it mean the foods are safer to eat or free of pathogens or allergens.

Helpful Resources

CN Labeling Website

This website includes general background of the CN Labeling Program and provides helpful information for food manufacturers and FNS CNP

<https://www.fns.usda.gov/cn/labeling/food-manufacturersindustry>

The CN Label Verification Reporting System

The system was developed to assist State agency reviewers, CNP operators, and the food industry in verifying the status of a CN label and the validity of a CN label copied with a watermark.

The system produces two comprehensive monthly reports available on the CN Labeling website at <https://www.fns.usda.gov/cn/labeling/authorized-labels-manufacturers>

- CN Label Verification Report includes all information pertaining to the valid CN label; this includes the CN number, product description, serving size, crediting information (meal pattern contribution statement), expiration date, and the manufacturer's establishment number.
- CN Label Manufacturers Report includes contact information for manufacturers, who are authorized to produce CN labeled products. This report allows users to link the manufacturer's list from the CN Label Verification Report.

For more information

Child Nutrition Labeling Program Operations Office

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Food Items for Further Processing

Explanation of the Columns

The yield data for foods in sections 1–5 of the FBG are for foods that are commonly purchased at the program level. The yield data table for Food Items for Further Processing contains food items intended to be used by industry for further processing. The yield information may also be used in the CN Labeling Program. It is important that CNP operators are aware of the yields for food items that industry uses for determining the meal pattern contribution for the Federal meal pattern requirements. The yield data provides program operators the information needed to verify that the processed food items they purchase are credited in a manner consistent with program requirements.

Column 1: Food As Purchased, AP

The individual foods are arranged in alphabetical order.

Column 2: Purchase Unit

The purchase unit is specified as 1 pound, or 1 package. You can use data for one purchase unit to determine how much product you need for a specific number of servings.

Column 3: Servings per Purchase Unit, EP (Edible Portion)

This column shows the number of servings of a given size (found in Column 4) from each purchase unit (found in Column 2). Numbers in this column have sometimes been rounded down in order to help ensure enough food for the number of servings.

Column 4: Serving Size per Meal Contribution

The size of a serving is given as a measure and/or weight or number of pieces. In most cases the serving size and contribution to the meal pattern are the same. When they differ, the contribution is stated along with the serving size.

Column 5: Purchase Units for 100 Servings

This column shows the number of purchase units (found in Column 2) you need for 100 servings. Numbers in this column are generally rounded up in order to help ensure enough food is purchased for the required number of servings.

Column 6: Additional Information

This column gives other information to help you calculate the amount of food you need to prepare meals. Column 6 information is not available for every food item.

