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## The USDA Child Nutrition (CN) Labeling Program

### Common Questions

#### What is the Child Nutrition Labeling Program?

The Child Nutrition (CN) Labeling Program is a voluntary Federal labeling program for the Child Nutrition Programs.

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

Yes, the CN Labeling Program applies to food-based menu planning approaches for the National School Lunch Program and School Breakfast Program, Child and Adult Care Food Program, and Summer Food Service Program. The CN label on a product communicates how the product contributes to USDA meal pattern requirements.

#### Who runs the program?

Agricultural Marketing Service (AMS) of the USDA 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 National Marine Fisheries Service (NMFS):

- FNS is responsible for regulations that govern the CN Labeling Program.
- NMFS oversees the CN label reviews and approvals for seafood products.
- FSIS provides inspection oversight for meat, poultry, and egg products to ensure plants are operating according to Federal food safety guidelines.
- Commercial food processing firms submit CN label applications to AMS for approval.

#### How does the program work?

- Foods must be produced in a federally inspected establishment.
- Food processing firms must have an approved Quality Control (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 <http://www.fns.usda.gov/cnlabeling/food-manufacturersindustry>.
- Food processing firms must allow Federal personnel to perform verification services. Verification services ensure products in compliance with the approved QC Programs. The SOPs for verification services are also available on the CN Labeling Web site at <http://www.fns.usda.gov/cnlabeling/food-manufacturersindustry>.
- Food processing firms must sign a service agreement with the AMS, CN Labeling Office.
- AMS or NMFS will conduct an evaluation of a product's formulation to determine its contribution towards meal pattern requirements. Once approved, the manufacturer may state the contribution on the product's label.
- The CN Label provides Child Nutrition program operators a warranty against audit claims if the product is used according to the manufacturer's directions as printed on the approved CN label.

#### What products are eligible for CN labels?

Main dish products which contribute to the Meats/Meat Alternates component of the meal pattern requirements are eligible for a CN label. Examples of these products include beef patties, cheese or meat pizzas, meat or cheese and bean burritos, egg rolls, and breaded fish portions.

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## What must eligible products have to carry a CN label?

- The contribution of the food component(s) must be determined using yields in the Food Buying Guide for Child Nutrition Programs.
- The product formulation and CN label must be approved by AMS.

## Are manufacturers required to CN label products?

There is no Federal requirement for products to have a CN label. The decision to procure CN labeled products is made at the local level. If CN labeled products are desired, program 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 Child Nutrition program 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?

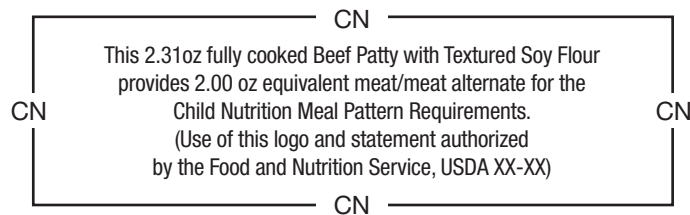
CN labeled products may cost more. Special labeling requirements, inspection costs, and extra staff costs to monitor quality control may be contributing factors in CN labeled products costing more than similar non-CN labeled products. Keep in mind that cost comparison between two meat products should 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.

## How do I identify a CN labeled product?

A CN labeled product will always contain the following:

- The CN logo, which is a distinct border
- The meal pattern contribution statement
- A unique 6-digit product identification number (assigned by AMS)
- The USDA/FNS authorization statement
- The month and year of AMS approval
- Plus the remaining required label features: product name, inspection legend, ingredient statement, signature/address line, and net weight.

A sample CN logo:



*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 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 crediting statement declares the quantities of the creditable food item(s) 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 Meal Programs.

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

### **The CN Label Verification Reporting System**

The system was developed to assist State agency reviewers, CN program 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 new system produces two comprehensive monthly reports:

- ▶ CN Label Verification Report includes all information pertaining to the valid CN label which includes the crediting information (meal pattern contribution statement); label expiration date; and the manufacturer's establishment number.

[https://www.fns.usda.gov/sites/default/files/cn/cnl\\_verificationreport.pdf](https://www.fns.usda.gov/sites/default/files/cn/cnl_verificationreport.pdf)

- ▶ CN Label Manufacturers Report includes contact information for manufacturers that are authorized to produce CN labeled products. This report allows users to link the manufacturer's list from the CN Label Verification Report.

[https://www.fns.usda.gov/sites/default/files/cn/cnl\\_manufacturers.pdf](https://www.fns.usda.gov/sites/default/files/cn/cnl_manufacturers.pdf)

### **For more information**

For additional information about the CN Labeling Program, contact AMS:

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## Food Items for Further Processing

The yield data for foods in sections 1 - 5 of the Food Buying Guide for Child Nutrition Programs are for foods that are commonly purchased at the program level. The table below of 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 Child Nutrition Program 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.