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Department of  
Agriculture

Food and  
Nutrition  
Service

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

**To:** Regional Directors  
Child Nutrition Programs  
All Regions

State Directors  
Child Nutrition Programs  
All States

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 USDA's Child Nutrition (CN) 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 manufacturers' 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 no 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 they must keep records of supporting documentation (original CN product label from the product carton or signed Product Formulation Statements) provided by the manufacturers. 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 CN 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](http://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](http://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 CN meal pattern. For example, fruit filled pancakes may not provide meat alternate because it is not obvious how the product contributes to the meat alternate component. In order for a product to claim a meat or meat alternate contribution, the product must have a visible meat or meat alternate 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 school food authority or other program operator for accuracy prior to the item being included in the reimbursable meal. Questions on product compliance with meal pattern requirements should be directed to the State agency.

State agencies should direct any questions concerning this guidance to the appropriate FNS Regional office. Regional offices with questions or concerns should contact the Child Nutrition Division.

Sincerely,

**Original Signed**

Cynthia Long  
Director  
Child Nutrition Division