Welcome to a short training on the USDA Child Nutrition Labeling Program. This is what is most commonly referred to as a CN Label.

The U.S. Department of Agriculture’s (USDA) CN Labeling Program is a voluntary federal labeling program for the USDA Child Nutrition Programs. It provides food manufacturers the option to include a standardized food crediting statement on their product labels. The USDA must approve labels prior to use and manufacturers must have quality control procedures and inspection oversight that meet USDA requirements. All manufacturers participating in the CN Labeling Program must have a quality control program approved by the Agricultural Marketing Service (AMS) or National Marine Fisheries Service (NMFS).
The Child Nutrition Labeling Program is operated by the Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) in cooperation with the Agriculture Marketing Service or the National Marine Fisheries Service.

Commercial food processing first submits CN label applications to USDA Food and Nutrition Service for approval. The program requires an evaluation of a product’s formulation by FNS to determine its contribution toward the meal pattern requirements. Once approved, it allows manufacturers to state this contribution on their labels. The program provides Child Nutrition program operators a warranty against audit claims for CN labeled products if the product is used according to the manufacturer’s directions as printed on the approved CN label.
To carry a CN Label, eligible products must:

- Have the contribution of the food component(s) determined using yields in the USDA’s Food Buying Guide.
- Have the product formulation and CN Label approved by FNS, and
- Be produced under inspection.

CN labels are available only for main dish entrees that contribute to the meat/meat alternates component of the meal pattern requirements. Examples are beef patties, cheese or meat pizzas, meat or cheese and bean burritos, egg rolls and breaded fish portions. The CN label will also indicate the contribution of other meal components that are part of these products, for example:

- CN labeled pizza may list contributions to the meat/meat alternates, grains and vegetables components; and
- CN labeled breaded chicken nuggets may list contributions to the meat/meat alternates and grain components.
This 5.00 oz pizza with Ground Beef and Vegetable Protein Product provides 2.00 oz equivalent meat/meat alternate, 1/8-cup serving of vegetable, and 1-1/2 servings of bread alternate for the Child Nutrition Meal Pattern Requirements. (Use of this logo and statement authorized by the Food and Nutrition Service, USDA XX-XX**)

The CN label will be found on the actual product packaging and will look like the label on this slide. A CN label will always contain the following:

- (click) the CN logo, which is a distinct border;
- (click) the meal pattern contribution statement;
- (click) a six-digit product identification number;
- (click) the USDA authorization; and
- (click) the month and year of approval.

The USDA does not allow manufacturers to place the CN label on a fact sheet or any other product information. To document a product’s compliance with the meal pattern requirements, (click) schools must have an original CN label from the product package.
Once in a while an invalid CN label will be used. If this is suspected, the label should be sent immediately to your State agency or USDA, FNS.

Manufacturers sometimes use labels that look like CN labels but are not. Be careful to look for the 5 identifications of a CN Label.

USDA cannot provide a warranty for use of products with no or an invalid CN label.

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Questions and Answers

- Are manufacturers required to CN label their products?  Yes  No
- Are sponsors required to buy CN labeled products?  Yes  No
- Are CN labeled products more nutritious?  Yes  No
- Are CN labeled products higher quality?  Yes  No

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Are manufacturers required to CN label their products?

(click) There is no federal requirement that manufacturers make CN labeled products or that schools and institutions participating in the USDA Child Nutrition Programs purchase foods with CN labels.

Are Child Nutrition Sponsors required to buy CN labeled products?

(click) There is no Federal requirement that sponsors purchase or use CN labeled products. Purchasing decisions are left to the local level. If a CN labeled product is desired, this must be clearly stated in the purchasing specifications.

It is often recommended to look for CN labeled products as an easy way to document how processed products meet meal pattern requirements.

Are CN labeled product more nutritious?
A CN label does not indicate that the CN product is healthier or more nutritious than a similar non-CN labeled product. The CN credit statement declares the quantities of the creditable food item, or items, in a processed food. The quantity of creditable food is used to meet the meal pattern requirements.

**Are CN labeled products higher quality?**

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.

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**Do CN Labeled Products Have Advantages?**

* Clearly identifies the contribution of a product toward the meal pattern requirement and it protects the purchaser from exaggerated claims about the product.
* Provides a warranty against audit claims if the product is used according to manufacturer’s directions.
* Simplifies cost comparison of similar products.

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A CN label statement clearly identifies the contribution of a product toward the meal pattern requirement, and it protects the purchaser from exaggerated claims about a product.

A CN label provides a warranty against audit claim if the CN labeled product is used according to the manufacturer’s directions.

A CN label simplifies cost comparison of similar products.
Do CN Labeled Products Cost More?

CN labeled products may cost more. Maybe

• Special labeling requirements, inspection, and extra staff costs to monitor quality control may contribute to CN labeled products costing more.
• Cost comparison between two M/MA products, it is the cost per oz. equivalent of M/MA rather than the cost per ounce or pound of the product that should be compared.

Do CN labeled products cost more?

CN labeled products may cost more.

(click) Special labeling requirement, inspection, and extra staff cost to monitor quality control may be contributing factors in CN labeled products costing more than a similar non-CN labeled product.

(click) However, Keep in mind that cost comparison between two meat products should be based on the cost per serving of the specified contribution to the meal pattern requirement, not on the product cost per ounce or pound.

What to Consider When Serving A CN Labeled Product

• Follow Product Instructions
• Portion Size

The CN labeling program can only offer program operators a warranty against audit claims if the product is used according to the manufacturers directions as printed on the approved CN label. It is important for the sponsor to follow the product instructions for preparation and service. Portion size must be the same as indicated on the CN label for crediting information to be correct. If the serving size is changed then the crediting information must be adjusted.
Revisions for Vegetable Subgroups and Whole Grain-rich Foods
The USDA is updating CN labels to be consistent with the new meal patterns for lunch and breakfast required by the Healthy, Hunger-Free Kids Act of 2010. CN labels will include the five vegetable subgroups (dark green, red/orange, beans/peas (legumes), starchy and other) and the whole grain-rich contribution to the grains component. The USDA is issuing temporary approvals expiring June 30, 2014, for CN label applications containing crediting for grains that are not whole grain-rich. These claims will continue to report “provides X servings of bread or bread alternate” so that program operators can distinguish between whole grain-rich claims and claims for grains that are not whole grain-rich.

Products containing both whole grain-rich and non-whole grain-rich claims, such as an enriched breaded chicken pattie on a whole grain-rich sandwich bun, will use both the terms “grains” for whole grain-rich items and “bread or bread alternate” for grains that are not whole grain-rich. These products will also receive temporary approvals from the USDA that expire on June 30, 2014.
Revisions for Vegetable Subgroups and Whole Grain-Rich Foods

This sample CN label demonstrates the changes to the crediting statements. This sample product contributes toward three vegetable subgroups (dark green, red/orange and other) and meets the whole grain-rich criteria. The authorization date would be where the X’s are.

Resources
ODE CN Labeling Program Fact Sheet
USDA Child Nutrition Labeling Program

The U.S. Department of Agriculture prohibits discrimination against its customers, employees, and applicants for employment on the basis of race, color, national origin, age, disability, sex, gender identity, religion, sexual orientation, marital status, familial or parental status, sexual orientation, or all or part of an individual’s income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, found online at https://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to USDA, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, or call (202) 690-7442 (this is a toll-free number accessible to people with hearing or speech disabilities). USDA is an equal opportunity provider and employer.