

## Section 23

# Food Product Labeling

# Section 23, Food Product Documentation

## Update Guide

- February 14, 2025** Incorporated the following United States Department of Agriculture guidance:
- *USDA Memo SP 05-2025, Guidance for Accepting Processed Product Documentation for Meal Pattern Requirements (November 7, 2024)*
- May 19, 2023 Created new *Definitions* and *Contact Information* sections, located at the beginning of the *Administrator's Reference Manual (ARM)*. Removed definitions and contact information from this section.
- January 4, 2022 Updated *Section 23, Food Product Documentation* to update the *Administrator's Reference Manual (ARM)* to correct minor typos.
- Clarified information on the following topics:
- Advertising Literature
  - Summary of Product Documentation
- August 12, 2020 Updated *Section 23, Food Product Documentation* to update the *Administrator's Reference Manual (ARM)* section references
- Incorporated the following United States Department of Agriculture guidance:
- *USDA Memo SP 32-2019, Buy American and the Agricultural Improvement Act of 2018 (August 15, 2019)*
- Clarified information on the following topics:
- Labeling harvested fish
- April 3, 2018 Updated *Section 24, Child Nutrition (CN Labeling and Product Documentation)* to incorporate the following United States Department of Agriculture guidance:
- *USDA Memo FD-107, National School Lunch Program (NSLP), Child and Adult Care Food Program (CACFP), Summer Food Service Program (SFSP), Commodity Supplemental Food Program (CSFP), Food Distribution Program on Indian Reservations (FDPIR), The Emergency Food Assistance Program (TEFAP), and Charitable Institutions (November 21, 2017)*
  - *USDA Memo SP 28-2016, Food and Drug Administration Requirements for Vending Machines (March 2, 2016)*
  - *USDA Child Nutrition Programs: TIPS for Evaluating a Manufacturer's Product Formula Statement (January 2016)*
  - *USDA Memo SP 36-2015, Voluntary Menu Labeling in the National School Lunch and School Breakfast Program (May 19, 2015)*
- Clarified information on the following topics:
- Calculating Calories from total fat and saturated fat, sugar, and sodium using product labels
  - CN Labels
  - Compliance
  - Food and beverage product labels, including product origin labeling
  - Records retention
  - Rounding in product formulation statements
  - Standards for meal and poultry products
  - Vending machines labeling
  - Voluntary menu labeling

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# Food Product Labeling

All school nutrition programs (SNP) are required to retain documentation that demonstrates that menus and beverage and food items served are compliant with the meal pattern as well as the Competitive Food Nutritional Standards (competitive foods).<sup>1</sup> There are typically six types of documentation available for contracting entities (CEs) to use for this purpose:

- **Child Nutrition (CN) Labeling**—While general labeling requirements apply to all food and beverage products, CN Labels are guaranteed to contain the contributions listed on the CN Label when the product is manufactured according to the directions.<sup>2</sup>
- **Food Buying Guide for School Meal Programs**—The *Food Buying Guide for School Meal Programs* provides detailed information that can assist CEs in determining (1) the number of creditable portions in specific products.<sup>3</sup>
- **USDA Foods Fact Sheets for Schools & Child Nutrition Institutions (USDA Foods Fact Sheet)**—USDA Foods Fact Sheets provide detailed information about products distributed through the USDA Foods (Commodities) program.<sup>4</sup>
- **Nutrition Facts Labels**—Nutrition Facts Labels provide nutritional information based on the recommended daily dietary values as specified by the United States Food and Drug Administration (FDA).<sup>5</sup>
- **Product Formulation Statements** (also referred to as manufacturer’s product statements and product analysis sheets)—Product formulation statements are signed and certified by the manufacturer to accurately report the crediting contribution of a product toward the meal pattern.
- **Product Advertising**—Advertising materials are commonly not certified and do not provide extensive information on a product formulation.

The information in this section on product documentation is intended to be used with the guidance provided in the following *Administrator’s Reference Manual (ARM)* sections:

- *Section 7, Breakfast Meals*
- *Section 8, Lunch Meals*
- *Section 9, Pre-Kindergarten Meals*
- *Section 22, Competitive Food Nutrition Standards*
- *Section 31, Administrative & Other Compliance Reviews*

For this section, when guidance is provided on the use of CN Labels or product documentation for meeting the meal pattern requirements, *meal pattern requirements* include menu planning, food components, crediting contributions, weekly minimums, and weekly dietary specifications.

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<sup>1</sup> See the *Administrator’s Reference Manual (ARM)*, *Section 7, Breakfast Meals*; *Section 8, Lunch Meals*; and *Section 22, Competitive Foods* for more information on requirements related to specific food items served.

<sup>2</sup> Detailed information on the CN Labeling Program can be accessed at [www.fns.usda.gov/cn/labeling-program/](http://www.fns.usda.gov/cn/labeling-program/).

<sup>3</sup> Available at [www.foodbuyingguide.fns.usda.gov/](http://www.foodbuyingguide.fns.usda.gov/)

<sup>4</sup> Additional information and individual NSLP USDA Food Fact Sheets are available at [www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets](http://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets)

<sup>5</sup> Detailed information on Nutrition Facts Labels can be found on the U.S. Food and Drug Administration (FDA) website at [www.fda.gov/](http://www.fda.gov/).

## Product Labels

For all food and beverage products sold in the United States, the product label must provide information about the product manufacturer or processor, nutrition information, and country of origin.<sup>6</sup> The Food and Drug Administration (FDA) guidance includes five items that must appear on every food or beverage packaging label (sticker) in order for the label to provide the required information:

<b>Statement of Identity</b>	Name of the food or beverage—specifically the common name for the food or beverage, not the brand name For Example: Sunny Delight is a brand name; orange juice is the product name. Peter Pan is a brand name; peanut butter is the product name.
<b>Product Net Weight</b>	Weight of the food or beverage item—net weight which does not include the weight of the container, wrappers, or packing materials
<b>Manufacturer and Manufacturer’s Address</b>	Location where the food or beverage product is processed and prepared, including country of origin information
<b>Nutrition Facts</b>	Serving size, nutrients, vitamins, and minerals <sup>7</sup>
<b>Ingredient List</b>	All ingredients in a food or beverage listed on the product package in the order of highest amount of each ingredient by weight—includes, but is not limited to, water, spices, and flavors

All labeling must be provided in clear and readable print. Print may be typed, printed, or handwritten.

### Acceptable Manufacturer Address

In addition to the name of the manufacturer, the label must also show the address, country of origin for the product and, if a processed product, country of origin where the processing occurred. For School Nutrition Programs (SNPs), country of origin is used to demonstrate compliance with the Buy American provision.<sup>8</sup>

### Location of Labels

Manufacturers must have the manufacturer’s address and country of origin (1) on individual product packaging or (2) on a box or container of smaller packaged items.

The following guidelines will assist CEs in determining if the country of origin information on the product label is acceptable or unacceptable.

<sup>6</sup> Product labels are also a key aspect of determining if the purchase meets the Buy American requirements. For additional information on this requirement, see *Administrator’s Reference Manual (ARM), Section 17, Procurement*.

<sup>7</sup> See the *Nutrition Facts Label* subsection in this section for additional information on this topic.

<sup>8</sup> Processing location may include the term *substantially*. For more information on the use of this term for the Buy American provision, see *Administrator’s Reference Manual (ARM), Section 17, Procurement*.

### Label Statement about the Ingredients

Acceptable Phrasing:	Product of ... or Grown in ...	
Unacceptable Phrasing:	Regional location that does not list the actual location unless the label lists both the regional location and the actual location	
	Unacceptable	To Be Acceptable <sup>9</sup>
	Grown and Raised in the Atlantic Region	Grown and Raised in Atlantic Region, MD, USA
Unacceptable Phrasing:	Flag or other symbols to represent origin location unless the label also provides a location in text as well	
	Unacceptable	To Be Acceptable
	Texas flag symbol	Texas flag symbol <u>and</u> Mexia, TX, USA
Unacceptable Phrasing:	Origin location as product name	
	Unacceptable	To Be Acceptable
	Pecos Melon	Pecos Melon, USA

### Label Statement about Where Product Was Processed

Acceptable Phrasing:	Manufactured in ... or Prepared in ... or Produced in... or Assembled in ... or Processed in ...	
Unacceptable Phrasing:	Insufficient information to determine actual location where the food was processed	
	Unacceptable	To Be Acceptable
	Manufactured in North America	Grown in Canada, manufactured in USA <sup>10</sup>
Unacceptable Phrasing:	Indication of processing in United States and non-United States locations (unless there is an indication that it was processed substantially in United States)	
	Unacceptable	To Be Acceptable
	Manufactured in Texas and Mexico	Grown and manufactured substantially in Texas, USA

### Size of Print

Any font or size is allowed as long as it is legible, easily seen (conspicuous), and in one color that contrasts with the background color.<sup>11</sup>

### Product Use by or Sell by Dates

Manufacturers are not required to place *best if used by, use by, sell by, or date of pack* dates on food products with the exception of infant formula. However,

<sup>9</sup> The US Custom and Border Protection (CBP) rules have established acceptable abbreviations for counties.

<sup>10</sup> While this is acceptable country of origin labeling, a product with this statement would not meet the Buy American requirements described in *Administrator's Reference Manual (ARM), Section 17, Procurement* because it does not indicate that the product is grown in the United States and the label does not indicate if the product was substantially processed in the United States.

<sup>11</sup> FDA provides additional information on appropriate print sizes at [www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm2006828.htm](http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm2006828.htm).

manufacturers commonly include these statements to assist consumers and retailers in determining when food is of the best quality.<sup>12</sup>

Best If Used by Before or Use by	Indicates when a product will have the best flavor or quality. It is not a purchase or safety date.
Sell by	Assists retail stores with knowing when the product will have the best flavor or quality and assists with managing product inventory management. It is not a safety date.
Date of Pack, Pack Codes, or Manufacturing Dates	Indicates when the product was packaged, processed, or manufactured. These dates do not communicate information related to quality or safety.

### Harvested Fish Designation

All fish sold must also have a designation of country of origin. To meet the Buy American provision requirements, the labeling must indicate the following:

- Farmed fish must be harvested within the US or any territory or possession of the US
- Wild caught fish must be harvested as described below.
  1. Within the Exclusive Economic Zone (EEZ) of US (no more than 200 nautical miles from the territorial sea baseline and is adjacent to the 12 nautical miles from the territorial sea of US, territories of US, or possession of US).
  2. By US flagged vessel (flies a US flag, uses US crew, follows US safety rules, and is built in US shipyard).

### Unlabeled Products

Since all food and beverage products sold in the United States must have product labels, any food or beverage products that do not have adequate information on the labels are suspect. CEs should evaluate these products and determine if they should be used in the SNP.<sup>13</sup>

## Child Nutrition (CN) Label

While the general label requirements apply to all products sold, the United States Department of Agriculture (USDA), Food Nutrition Service (FNS), Child Nutrition (CN) Labeling Program works directly with commercial food processing firms and in cooperation with the Food Safety Inspection Service (FSIS), Agricultural Marketing Service (AMS), and National Marine Fisheries Service (NMFS) to approve and manage CN Labels which are designed to meet the specific labeling needs of Child Nutrition Programs (CNPs).

A CN Label is

a product label that contains a statement that clearly identifies the crediting contribution that a product makes toward the meal pattern.

<sup>12</sup> USDA provides additional information on these labels at [www.fsis.usda.gov/wps/portal/fsis/topics/food-safety-education/get-answers/food-safety-fact-sheets/food-labeling/food-product-dating/food-product-dating](http://www.fsis.usda.gov/wps/portal/fsis/topics/food-safety-education/get-answers/food-safety-fact-sheets/food-labeling/food-product-dating/food-product-dating).

<sup>13</sup> Product labels are also a key aspect of determining if the purchase meets the Buy American requirements. For additional information on this requirement, see *Administrator's Reference Manual (ARM), Section 17, Procurement*.



To obtain a CN Label, the manufacturer has participated in a Quality Control plan administered by the Agricultural Marketing Service (AMS) or National Marine Fisheries Service (NMFS) using guidelines provided by USDA FNS. CN Labels must be authorized by USDA FNS prior to use. CN Labels are designed to provide specific crediting contribution information for meat/meat alternates. However, when meat/meat alternate products contain other components, the CN Label may also provide information related to other meal pattern food components in addition to the meat/meat alternate information.<sup>14</sup>

The CN Labeling Program is responsible for reviewing a product's formulation to determine the crediting contribution that a single serving of a product makes toward the meal pattern.

Schools and other program operators are not required to offer products with CN Labels; however, it is important to recognize that a CN Label guarantees that the stated crediting contribution toward meal pattern is correct when the product is prepared and served according to the directions. No other available documentation is guaranteed to meet this standard.

### Label Statement

The CN Label statement is an integral part of the product label and must include the following information:

- The CN logo, a distinct border around the CN statement
- A six-digit product identification number assigned by FNS, located in the upper right corner of the CN Label statement
- The statement of the product's crediting contribution toward meal pattern requirements for components included in the product
- Statement specifying the use of the logo and CN Label statement is authorized by FNS
- The month and year the label was approved by FNS, located in the lower right side.

CN labels are valid for five years under the condition that the manufacturer remains an authorized CN producer and the product formulation does not change. The date printed on the CN label is the date of approval for use of that CN label. This is different from the "Valid Until" date shown on the CN Label Verification Report, which indicates when the current authority to use the label expires.

### CN Label Verification Report

USDA provides a list of valid labels that is updated monthly on the FNS CN Labeling Program website at [www.fns.usda.gov/cn/labeling-program](http://www.fns.usda.gov/cn/labeling-program). The "Valid Until" date shown on the CN Label Verification Report indicates when the label expires.

A CE may continue to use a product with an old CN label if the product has been reauthorized by FNS, meaning a valid product may have a CN label approval date that is over five years old. To verify the label and determine its expiration, CEs should check the status of the label on the CN Label Verification Report before

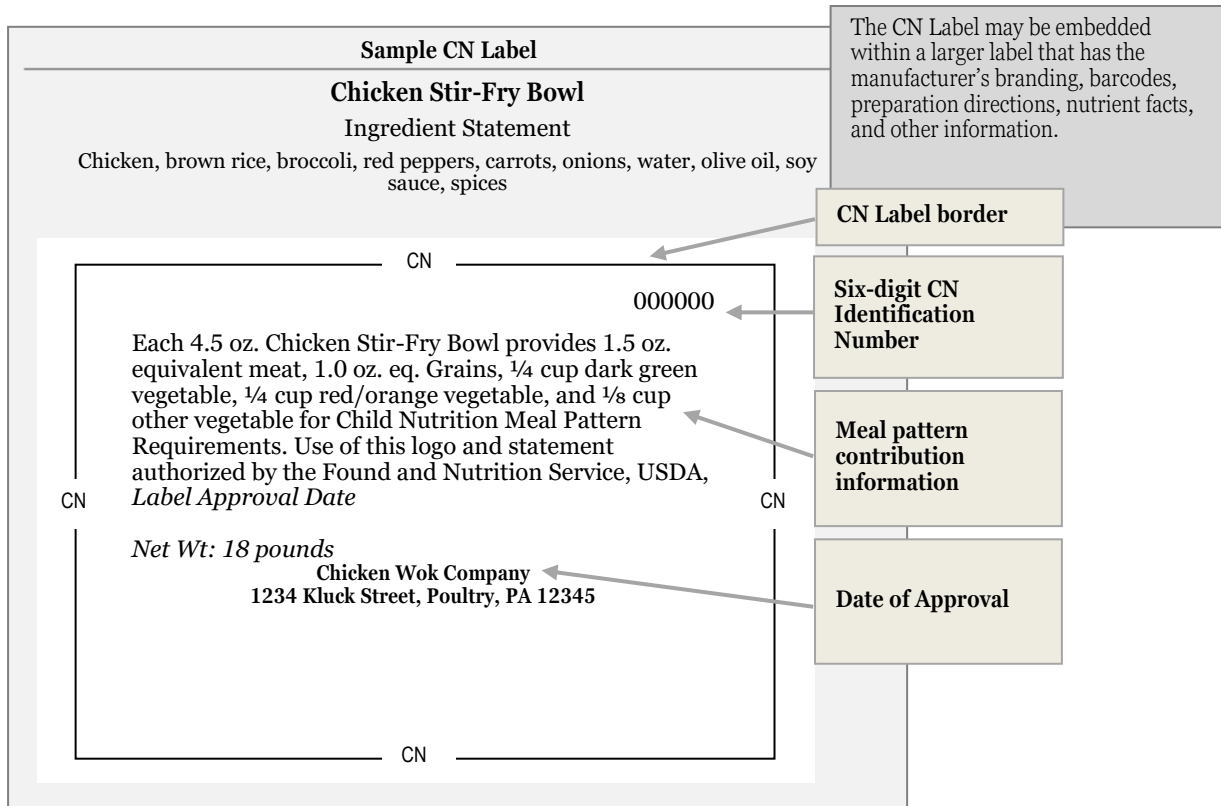
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<sup>14</sup> Although designed to identify crediting contributions for NSLP/SBP meal pattern, CN Labels may also provide information that may be used to demonstrate whether the food product meets the competitive food requirements.

using the product. This list may also provide additional information including the manufacturer's physical address and, in some cases, contact information.

## Sample CN Label

The *Sample CN Label* illustrates the information that is required to be included on a CN Label as well as additional information that may be included on the CN Label.



## Federal Inspection

All CN Labeled products must be produced under an appropriate USDA or U.S. Department of Commerce (USDC) federal inspection program to ensure that the label statement accurately reflects the amount of each ingredient used in the product. Federal agencies



inspecting these products include the following agencies:<sup>15</sup>

- Food Safety and Inspection Service (FSIS) of USDA
- Agricultural Marketing Service (AMS) of USDA
- National Marine Fisheries Services (NMFS) of the U.S. Department of Commerce (USDC)

The *Federal Inspection Labels Chart* illustrates the stamps used by various federal inspectors to indicate that the product has been inspected and meets the requirements for that type of product.

## CE Responsibility for Use of CN Labeling

Although USDA monitors manufacturer documentation and guarantees the accuracy of information, the CE is responsible for interpreting the information presented on the label and determining if a product meets the meal pattern.

<p>The CN Label statement <u>tells how the labeled product can be credited or counted</u> toward meeting the meal pattern.</p>	<p>A CN Label statement</p> <ul style="list-style-type: none"><li>• <u>Does not</u> assure that a product is <i>good for children</i></li><li>• <u>Does not</u> assure that a product is <i>acceptable to children</i>.</li><li>• <u>Does not</u> suggest that products without CN Labels are inferior</li></ul>
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### Acceptable Forms of CN Label Documentation

CEs may use any of the following methods to retain CN Label documentation or records.

- Original label removed from product package.
- Photocopy of CN Label attached to or printed on the product package if the CN Label is difficult to remove or laser printed.
- Photograph of CN Label attached to or printed on the product package if the CN Label is difficult to remove or laser printed.

TDA recommends the following practices for retaining CN Labeling documentation or records.

- Establish a procedure for designated food service staff to safely remove CN Labels from boxes. Only one CN Label is needed for the same CN Labeled product purchased by the CE.
- File CN Labels in a designated binder for future reference and check **the CN Label Verification Report** make sure the filed label is current.
- File digital photos or electronically scanned labels with applicable SNP documentation or records that can be easily retrieved for future reference.<sup>16</sup>

<sup>15</sup> Additional information about requesting copies of federally inspected product labels from manufacturers during the bidding process can be found at [www.fns.usda.gov/cn/labeling-program](http://www.fns.usda.gov/cn/labeling-program).

<sup>16</sup> School nutrition funds may be used to purchase a camera for food service operational needs. Most cameras can also date stamp the photo.

## Food Buying Guide (FBG) for Child Nutrition Programs

The *Food Buying Guide for Child Nutrition Programs* is

a USDA resource that provides information that can assist CEs in determining (1) the number of creditable portions in specific products and (2) whether a product fulfills the requirements for a designated food component.<sup>17</sup>

USDA developed the *Food Buying Guide for Child Nutrition Programs* as a tool to assist CEs to do the following:

1. To determine the number of purchase units needed to obtain the desired number of servings of a particular food.
2. To adjust portion sizes and calculate servings to meet minimum meal pattern requirements.
3. To calculate the quantity of food to buy to obtain the correct amount of ready-to-cook and ready-to-use food for a recipe.
4. To determine correct yields for food purchased, prepared, and ready-to-cook or ready-to-use, especially for fresh fruits and vegetables.
5. To calculate cost comparisons.

The *Sample Food Buying Guide for Child Nutrition Meal Programs* illustrates the way product information is presented *Food Buying Guide for Child Nutrition Programs*.

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<sup>17</sup> Available at [www.foodbuyingguide.fns.usda.gov/](http://www.foodbuyingguide.fns.usda.gov/)

Sample Food Buying Guide for Child Nutrition Programs

Take from ([www.foodbuyingguide.fns.usda.gov](http://www.foodbuyingguide.fns.usda.gov))

Food Buying Guide for Child Nutrition Programs

**VEGETABLES**

**ADDITIONAL SUBGROUP**

**Section 2 - Vegetables – Additional Subgroup<sup>1</sup>**

1. Food As Purchased, AP	2. Purchase Unit	3. Servings Per Purchase Unit, EP	4. Serving Size per Meal Contribution	5. Purchase Units for 100 Servings	6. Additional Information
<b>PEAS AND CARROTS</b>					
<b>Peas and Carrots, canned</b>	No. 10 can (105 oz)	41.30	1/4 cup heated, drained vegetable	2.5	1 No. 10 can = about 66.0 oz (11-1/2 cups) drained, unheated peas and carrots
	Pound	6.30	1/4 cup heated, drained vegetable	15.9	
<b>Peas and Carrots, frozen</b>	Pound	10.90	1/4 cup cooked, drained vegetable	9.2	
<b>SOUPS, CANNED</b>					
<b>Soups, canned Condensed (1 part soup to 1 part water) minestrone, tomato, tomato with other basic components such as rice, vegetable (all vegetable), and vegetable with other basic components such as meat or poultry</b>	No. 3 Can 50 oz (or about 46 fl oz)	11.50	1 cup reconstituted (about 1/4 cup vegetable)	8.7	Reconstitute 1 part soup with not more than 1 part water
	Pound	3.68	1 cup reconstituted (about 1/4 cup vegetable)	27.2	
	Picnic (about 10-3/4 oz)	2.40	1 cup reconstituted (about 1/4 cup vegetable)	41.7	

Organized by Food Components

Vegetables Organized by Subgroups

Product Type

Purchase Unit (Package/Container Size)

Number of Servings per Purchase Unit (Package/Container)

Crediting Contribution

Number of Purchase Units (Packages/Containers) Needed for 100 Servings

Serving, Yield, Preparation Information

## **CE Responsibility for Use of the *Food Buying Guide (FBG) for Child Nutrition Programs***

Although USDA provides nutritional information based on the most accurate available information, the CE is responsible for interpreting the information presented in the *FBG* and determining if a product meets the meal pattern.

CEs are not required to print and retain copies of the *FBG* but may find it helpful to retain copies of pages that are commonly used.

## **USDA Foods Fact Sheet for Schools & Child Nutrition Institutions**

The USDA Foods Fact Sheet for Schools & Child Nutrition Institutions

is a type of product documentation distributed by the USDA Foods (Commodities) program that provides product specific information on crediting contribution toward the meal pattern or provides information that may help determine whether a product meets the competitive food requirements.

These documents incorporate nutritional information that is taken from the USDA National Nutrient Database or average values based on information from vendors who provide USDA Foods. Facts Sheet. This includes the following information:

- USDA Foods Material Code—a six-digit number that is unique to the product (located to the left of the product name)
- Food Category—Grains, meat/meat alternates, fruits, and vegetables
- Nutrition Information
- Product yield and crediting information
- Allergen information (available as appropriate and on newer releases)
- Information on Product Preparation
- Food Safety Information

The *Sample USDA Foods Fact Sheet* illustrates the way product information is presented on the facts sheet.

## **CE Responsibility for Use of a USDA Foods Fact Sheet**

Although USDA provides nutritional information based on the most accurate available information, the CE is responsible for interpreting the information presented on the fact sheet and determining if a product meets the meal pattern or competitive food requirements.

To use a USDA Foods Fact Sheet for documentation, the CE must ensure that it uses the most current fact sheet and must retain the fact sheet with its food documentation or records.

**Sample USDA Foods Fact Sheet**  
(Taken from [www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets](http://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets))

UNITED STATES DEPARTMENT OF AGRICULTURE  
**USDA Foods Product Information Sheet**  
 For Child Nutrition Programs

**100359—Beans, Black (Turtle), Low-sodium, Canned**

Category: **Legume Vegetable/Meat Alternate**

**USDA Foods Material Code**

**Category/Component**

**PRODUCT DESCRIPTION**

This item is Grade A canned, dried black turtle beans. They are packed in a low-sodium brine which contains 36-140 mg sodium per 1/2 cup serving. This product is available in cases with six #10 cans.

**NUTRITION FACTS**

Serving size: 1/2 cup (120 g) black beans, canned, low-sodium

Amount Per Serving	
Calories	109
Total Fat	0g
Saturated Fat	0g
Trans Fat	0g
Cholesterol	0mg
Sodium	140mg
Total Carbohydrate	20g
Dietary Fiber	8g
Sugars	0g
Protein	7g

Source: USDA National Nutrient Database

**CREDITING/YIELD**

- One case of black beans provides about 83 1/2-cup servings of heated, drained beans.
- CN Crediting: 1/2 cup beans credits as 1/2 cup legume vegetable OR 2 oz equivalent meat/meat alternate.

**CULINARY TIPS AND RECIPES**

- Black beans can be cooked and used as a meat alternate in dishes such as burritos, tacos, or quesadillas.
- Black beans can also be cooked as a side dish or used in cold salads with other vegetables such as corn and diced peppers.
- Drain and rinse canned beans before adding to recipes to reduce the sodium.
- For more culinary techniques and recipe ideas visit [NFSMI](#) or [Team Nutrition](#).

**FOOD SAFETY INFORMATION**

- For more information on safe storage and cooking practices visit [Food Safety Approaches](#)

**Preparation Tips**

Allergen Information: Please refer to allergen statement on the outside of the product package for vendor-specific information. For more information, please contact the product manufacturer.

Nutrient values in this section are from the USDA National Nutrient Database for Standard Reference or are representative values from USDA Foods vendor labels. Please refer to the product's Nutrition Facts label or ingredient list for product-specific information.

**Food Safety Information**

United States Department of Agriculture  
Food and Nutrition Service

**USDA Foods Fact Sheet for Schools & Child Nutrition Institutions**

(Last updated: 09-09-13) Visit us at [www.fns.usda.gov/fdd](http://www.fns.usda.gov/fdd)

**100243 – BLUEBERRIES, FROZEN, WILD, IQF, 30 LB**

CATEGORY	Description	Nutrition Information	
		1/2 cup (120 g)	1/2 cup (75 g)
<b>CATEGORY</b>	Fruits	<b>Blueberries, wild, frozen, unsweetened</b>	
<b>PRODUCT DESCRIPTION</b>	U.S. Grade B or better blueberries, unsweetened. Native type (wild), individually quick frozen (IQF).	Calories	17
<b>PACK/YIELD</b>	30 lb case. One 30 lb case AP yields about 89 1/4 cups thawed, ready-to-serve blueberries and provides about 357.0 1/2-cup servings thawed ready-to-serve fruit. One 1b AP yields 0.91 lb (about 2 1/2 cups) thawed, ready-to-serve blueberries and provides about 11.9 1/2-cup servings thawed, ready-to-serve fruit. CN Crediting: 1/2 cup thawed, ready-to-serve blueberries provides 1/2 cup fruit.	Protein	0.28 g
<b>STORAGE</b>	Store frozen blueberries in the freezer at 0 °F or below, off the floor, and away from walls to allow for circulation of cold air. Temperature changes shorten shelf life and speed deterioration. Store opened frozen blueberries covered and labeled in a dated nonmetallic container under refrigeration and use within 2 days. Use First-In-First-Out (FIFO) storage practices to ensure use of older product first.	Carbohydrate	4.06 g
		Dietary Fiber	1.0 g
		Sugars	3.27 g
		Total Fat	0 g
		Saturated Fat	0 g
		Trans Fat	0 g
		Cholesterol	0 mg
		Iron	0.43 mg
		Calcium	6 mg
		Sodium	0 mg
		Magnesium	2 mg
		Potassium	21 mg
		Vitamin A	1.0 RAE
		Vitamin A	64 IU
		Vitamin C	0.8 mg
		Vitamin E	0.19 mg

**FOOD SAFETY INFORMATION**

- Cook frozen fruits and vegetables that are going to be held on a steam table or in a hot box to 155 °F for 15 seconds.
- Do not refreeze blueberries.

**BEST IF USED BY GUIDANCE**

- For guidance on how to effectively manage, store, and maintain USDA Foods, please refer to the policy memo on the FDD Website at [http://www.fns.usda.gov/fdd/policymemo/fdd0107\\_NSLP\\_FACT\\_SHEET\\_CSNP\\_110108\\_110108\\_C1\\_StorageMemo.pdf](http://www.fns.usda.gov/fdd/policymemo/fdd0107_NSLP_FACT_SHEET_CSNP_110108_110108_C1_StorageMemo.pdf).



# Nutrition Facts Label

## A Nutrition Facts Label

is a label that is added to beverage and food products to provide information about the product’s nutritional profile and serving size by weight or volume.

Nutrition Facts Labels are regulated by the Food and Drug Administration (FDA).

The FDA requires that most food and beverage products have Nutrition Facts Labels. The manufacturer is responsible for the accuracy of the information provided on a Nutrition Facts Label based on criteria provided by the FDA. The FDA audits Nutrition Facts Labels but does not review and approve individual Nutrition Facts Labels. Detailed information on Nutrition Facts Labels can be found on the FDA website at [www.fda.gov/](http://www.fda.gov/).

The information on Nutrition Facts Labels may be helpful in calculating weekly dietary specifications as well as determining whether a product makes a creditable contribution toward a meal pattern component or provides information that may help determine whether the product meets the competitive food requirements.

A Nutrition Facts Label must contain specific information on a food or beverage’s nutritional profile in the following areas:

- Serving size by weight or volume
- Number of servings in the package
- Nutrient values for a product—calories, saturated fat, trans fat, cholesterol, sodium, carbohydrates, fiber, protein, and vitamins

The *Sample Nutrition Facts Label* illustrates the way product information is presented on a label.

**Sample Nutrition Facts Label**  
(Taken from [www.fda.gov/](http://www.fda.gov/))

**1 Start Here** →

**Nutrition Facts**  
Serving Size 1 cup (228g)  
Servings Per Container 2

**2 Check Calories**

Amount Per Serving  
**Calories** 250      Calories from Fat 110

**3 Limit these Nutrients**

	% Daily Value*
<b>Total Fat</b> 12g	<b>18%</b>
Saturated Fat 3g	15%
Trans Fat 3g	
<b>Cholesterol</b> 30mg	<b>10%</b>
<b>Sodium</b> 470mg	<b>20%</b>
<b>Total Carbohydrate</b> 31g	<b>10%</b>

**6 Quick Guide to % DV**

- 5% or less is Low
- 20% or more is High

**4 Get Enough of these Nutrients**

Dietary Fiber 0g	0%
Sugars 5g	
<b>Protein</b> 5g	
Vitamin A	4%
Vitamin C	2%
Calcium	20%
Iron	4%

**5 Footnote**

\* Percent Daily Values are based on a 2,000 calorie diet. Your Daily Values may be higher or lower depending on your calorie needs.

	Calories: 2,000	2,500
Total Fat	Less than 65g	80g
Sat Fat	Less than 20g	25g
Cholesterol	Less than 300mg	300mg
Sodium	Less than 2,400mg	2,400mg
Total Carbohydrate	300g	375g
Dietary Fiber	25g	30g

## CE Responsibility for Use of a Nutrition Facts Label

Although FDA monitors the information manufacturers include on the Nutrition Facts Label, the CE is responsible for interpreting the information presented on the label and determining if a product meets the meal pattern or competitive food requirements.

To use a Nutrition Fact Label for documentation, the CE must ensure that it uses the most current Nutrition Fact Label and must retain the Nutrition Fact Label with its food documentation or records. When a Nutrition Fact Label provides the needed nutritional information for a product, a CE may use that information as recorded. There are instances where a CE will need to perform calculations using the nutritional information on a Nutrition Facts Label. The following calculation formulas may be helpful:

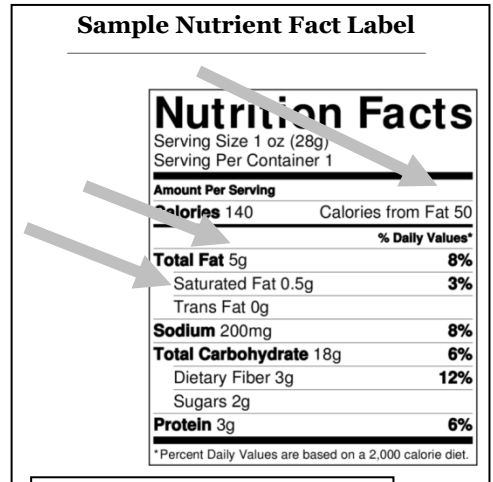
### Nutrition Facts Label, Calculating Calories from Total Fat and Saturated Fat

The nutrition facts label panel includes total fat in two places:

1. listed as calories from fat near the top and
2. listed as grams (g) on the list of nutrients in the product.

#### Calories from Total Fat

A CE may choose whether to use the calories from fat method or the grams of fat method for this calculation even though each may yield slightly different results. The result of either method should not be rounded.



### Percentage of Calories from Total Fat Per Serving C

#### Calories from Fat Method—Per Serving

<b>Calories from Fat Per Serving</b>		<b>Total Calories Per Serving</b>		<b>100</b>	<b>Percentage of Calories from Fat Per Serving</b>
50	÷	140	=	.357	x 100 = 35.7%

#### Grams of Total Fat Method—Per Serving

<b>Number of Grams of Fat Per Serving</b>		<b>9<sup>^</sup></b>		<b>Total Calories Per Serving</b>		<b>100</b>	<b>Total Percentage of Calories from Fat Per Serving</b>
5	x	9	=	45	÷	140	= .3214 x 100 = 32.14%

<sup>^</sup> There are 9 calories in each gram of fat

**Percentage of Calories from Saturated Fat Per Serving**

To calculate the percentage of calories from saturated fat per serving, the CE will use the following formula.

**Sample Nutrient Fact Label**

Nutrition Facts	
Serving Size 1 oz (28g) Serving Per Container 1	
Amount Per Serving	Calories from Fat 50
<b>Calories</b> 140	
<b>% Daily Values*</b>	
<b>Total Fat</b> 5g	<b>8%</b>
Saturated Fat 0.5g	<b>3%</b>
Trans Fat 0g	
<b>Sodium</b> 200mg	<b>8%</b>
<b>Total Carbohydrate</b> 18g	<b>6%</b>
Dietary Fiber 3g	<b>12%</b>
Sugars 2g	
<b>Protein</b> 3g	<b>6%</b>

\*Percent Daily Values are based on a 2,000 calorie diet.

**Percentage of Calories from Saturated Fat Per Serving Calculation Chart**

Grams of Total Fat Method—Per Serving

<b>Number of Grams of Saturated Fat Per Serving</b>	<b>9<sup>^</sup></b>	<b>Total Calories Per Serving</b>	<b>100</b>	<b>Total Percentage of Calories from Saturated Fat Per Serving</b>
0.5	x 9 = 4.5	÷ 140 = .0321	x 100 =	3.2%

<sup>^</sup> There are 9 calories in each gram of fat

**Nutrition Facts Label, Calculating Percentage of Sugar Serving**

The nutrition facts panel includes grams (g) of sugar on the nutrition facts label. CEs may use the following formula to calculate the percentage of sugar by weight.

**Sample Nutrient Fact Label**

Nutrition Facts	
Serving Size 1 oz (28g) Serving Per Container 1	
Amount Per Serving	Calories from Fat 50
<b>Calories</b> 140	
<b>% Daily Values*</b>	
<b>Total Fat</b> 5g	<b>8%</b>
Saturated Fat 0.5g	<b>3%</b>
Trans Fat 0g	
<b>Sodium</b> 200mg	<b>8%</b>
<b>Total Carbohydrate</b> 18g	<b>6%</b>
Dietary Fiber 3g	<b>12%</b>
Sugars 2g	
<b>Protein</b> 3g	<b>6%</b>

\*Percent Daily Values are based on a 2,000 calorie diet.

Per

**Percentage of Sugar by Weight Per Serving Chart**

<b>Number of Grams of Sugar Per Serving</b>	<b>Item Total Weight (Grams) Per Serving</b>	<b>100</b>	<b>Percentage Sugar by Weight Per Serving</b>
2	÷ 28 = .0714	x 100 =	7.14%

**Nutrition Facts Label, Calculating Sodium**

Sodium is reported by milligrams (mg) for each serving on the nutrition facts label for each product. No further calculation is needed to determine if the sodium meets the sodium nutrition standard.

**Sample Nutrient Fact Label**

Nutrition Facts	
Serving Size 1 oz (28g) Serving Per Container 1	
Amount Per Serving	Calories from Fat 50
<b>Calories</b> 140	
<b>% Daily Values*</b>	
<b>Total Fat</b> 5g	<b>8%</b>
Saturated Fat 0.5g	<b>3%</b>
Trans Fat 0g	
<b>Sodium</b> 200mg	<b>8%</b>
<b>Total Carbohydrate</b> 18g	<b>6%</b>
Dietary Fiber 3g	<b>12%</b>
Sugars 2g	
<b>Protein</b> 3g	<b>6%</b>

\*Percent Daily Values are based on a 2,000 calorie diet.

**Product Formulation Statement**

The product formulation statement

is a document that provides product specific information on the product’s potential crediting contribution toward meal pattern.

When a CN Label is not available or the *FBG*, USDA Foods Fact Sheet, or Nutrition Facts Label does not provide adequate information, a CE may request a product formulation statement from a manufacturer.<sup>18</sup> Product formulation statements are written, designed, signed/certified, and distributed by the individual manufacturer. USDA does not review or approve product formulation statement; therefore, there is no guarantee that the statements made by the manufacturer are accurate.

[NOTE: Product formulation statements must be written by the manufacturer. A product formulation statement written by a product vendor is not acceptable documentation for any purpose.]

### **Contents of Product Formulation Statement**

A product formulation statement contains a description that clearly identifies the crediting contribution that the product makes toward the meal pattern components.

When a manufacturer provides a product formulation statement, it should

- Be on the manufacturer's letterhead.
- Be signed and certified by an officer for the manufacturer.
- Include contact information for the officer signing the Product Formulation Statement.
- Provide the product name and product code number.
- Demonstrate how the processed product credits toward the meal pattern or competitive food requirements citing school nutrition program resources and/or regulations.
- Provide specific information about the amount of each food item in the product and crediting contribution for the meal pattern components.

TDA provides sample templates for Product Formulation Statements at [www.SquareMeals.org](http://www.SquareMeals.org).

### **CE Responsibility for Use of a Product Formulation Statement**

Although an officer for the manufacturer signs/certifies these statements to attest to the information, CEs have to trust that the official for the manufacturer is providing accurate nutritional information. USDA encourages CEs to review product formulation statements carefully since the CE is responsible for ensuring that menus meet meal pattern.

If the formulation of a product changes, the CE will need to obtain a new product formulation statement that reflects the product changes.

#### **General Guidance for CEs Reviewing Product Formulation Statements**

At a minimum, CEs should take the following actions before using a product formulation statement as proof for crediting contributions:

- Ensure that the product formulation statement provides specific, not approximate, crediting contribution specifications. **Product formulation statements that contain phrases like *to the best of our knowledge* and/or *contribution of the product is approximately* do not provide the necessary specificity for a CE to determine if the product provides the crediting contributions as claimed. A CE should not accept a product**

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<sup>18</sup> A product manufacturer is not required to provide a product formulation statement but may do so at the request of a CE.

formulation statement containing such language since it does not certify that the product contains the ingredients described.

- Determine that creditable ingredients listed in the product formulation statement match a description in the FBG.<sup>19</sup> **If a product formulation statement for a specific product claims to provide a higher credit than what is listed in the *FBG*, the CE must ensure that the statement**
  1. clarifies all crediting contributions for ingredients and
  2. demonstrates how the product provides that crediting contributions according to FNS regulations, guidance, and policy.
- Verify that the stated amount of crediting contribution for the product is not greater than the serving size of the product. **If the product formulation statement indicates a larger crediting contribution than the actual serving size of the product, the CE cannot use the product formulation statement.**

For Example: A 2.2 fl. oz. (1/4 cup) frozen fruit pop or bar may not credit for more than 2.2 fl. oz. or 1/4 cup of fruit or fruit juice.
- Ensure that the total contribution rounds down. **The total creditable amount must be rounded down to the nearest 0.25.oz.**

For Example: The total creditable amount of 0.99 oz. must be rounded down to 0.75 oz.
- Verify that creditable components are visible in the finished product. It is never acceptable for a CE to rely completely on a manufacturer's statement that a food item is included in the product. If the manufacturer states that the product includes a crediting contribution for a specific component for the meal pattern, the food item must be visible in the product.

For Example: If the product formulation statement says that a fruit filled pancake product contains a meat/meat alternate, but a meat/meat alternate is not a visible ingredient in the product, the CE cannot assume that the product contains a meat/meat alternate.

## Advertising Literature

Advertising literature is created and distributed by the product manufacturer. It may contain useful information about one or more of the company's products, including nutritional information. However, the information in an advertisement is not sufficient to provide information on the crediting contribution that a product makes toward the required meal pattern or provide information that may help determine whether a product meets the competitive food requirements.

Instead, the CE must use an acceptable form of documentation to demonstrate the crediting contribution or nutritional profile of a beverage or food product. This includes a CN Label, *FBG*, USDA Foods Fact Sheet, and Nutrition Facts Label, product formulation statement, or manufacturer's specification.

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<sup>19</sup> The *Food Buying Guide (FBG) for Child Nutrition Programs* available at [www.foodbuyingguide.fns.usda.gov](http://www.foodbuyingguide.fns.usda.gov).

## Standards for Meat and Poultry Products

USDA standards for meat and poultry products set legal requirements for content, preparation, and labeling before being manufactured and sold in commerce. Standards of identity set specific (and optional) ingredients a food must contain—such as the kind and amount of meat, percent of fat or moisture and additives, if any—when a product is to be labeled or identified by a common product name. See USDA FNS website ([www.ams.usda.gov/grades-standards](http://www.ams.usda.gov/grades-standards)) for more information on the standards for meat and poultry products.

### Meat and Poultry Inspection in Texas

The Texas Department of State Health Services (DSHS), Division for Regulatory Services, Meat Safety Assurance Unit, is responsible for administering the meat and poultry inspection program in Texas. All State of Texas meat and poultry plant labels are reviewed by the Labels and Standards Program to assure they are truthful and accurate at the time of approval. For additional information, contact DSHS.

Meat Safety Assurance Unit, MC 1872  
Texas Department of State Health Services  
P.O. Box 149347  
Austin, Texas 78714-9347  
Telephone: (512) 834-6760 |  
TDD: 1-800-735-2989  
Fax: (512) 834-6763

## Other Regulation Applying to Food Labeling

CEs must follow the Food and Drug Administration (FDA) vending machine regulations as applicable and may follow the United States Department of Health and Human Services (HHS) and FDA menu labeling regulations.

### Food and Drug Administration (FDA) Vending Machine Guidance

Any CE that owns or operates 20 or more vending machines is required (1) to disclose calorie information for food and beverages sold from the machines and (2) to provide contact information for vending machine operator. However, FDA recommends that all vending machines provide this information.

FDA defines a vending machine owner or operator that is covered by this regulation as a person or entity that

Controls or directs the function of the vending machine, including deciding which articles of food or beverage are sold from the vending machine or the placement of the articles of food or beverages within the vending machine and is compensated for the control or direction of the function of the vending machine.

The calorie statements must meet the following requirements:

- Clear, conspicuous (easily noticeable and visible to users), and prominently placed.
- Disclosed on a sign (e.g., small placard, sticker, or poster) near the food item or selection button. The owner or operator may also use electronic or digital displays to communicate the information. However, if the buyer can easily see the nutrition fact label for the item or the nutrition information is visible at the point of service (POS) because of the way the product is placed or stored, no statement of calories is required.

Failure to comply with the FDA regulation will render covered vending machine food misbranded under the Federal Food, Drug, and Cosmetic Act.

CNP operators also may wish to incorporate requirements of this FDA regulation into their vending machine contracts in order to ensure that covered vending machine operators contracted by the CNP operator include the calorie information when it is required.

#### Additional Information on FDA Vending Machine Labeling Regulation

- *Food Labeling: Calorie Labeling of Articles of Food in Vending Machines* at [www.federalregister.gov/articles/2014/12/01/2014-27834/food-labeling-calorie-labeling-of-articles-of-food-in-vending-machines](http://www.federalregister.gov/articles/2014/12/01/2014-27834/food-labeling-calorie-labeling-of-articles-of-food-in-vending-machines)
- *Vending Machines Labeling Requirements At-A-Glance* at [www.fda.gov/food/food-labeling-nutrition/overview-fda-labeling-requirements-restaurants-similar-retail-food-establishments-and-vending](http://www.fda.gov/food/food-labeling-nutrition/overview-fda-labeling-requirements-restaurants-similar-retail-food-establishments-and-vending)

### United States Department of Health and Human Services (HHS) and FDA Voluntary Menu Labeling

CEs may voluntarily follow the retail food establishment rules to (1) provide calorie information for all standard menu items and (2) provide, on request, the following nutritional information: total calories, calories from fat, total fat, saturated fat, trans fat, cholesterol, sodium, total carbohydrates, dietary fiber, sugar, and protein.

Providing nutritional information for food and beverage items on menus may help students to make more informed choices about the foods they select and consume at school. Since many schools use nutrition software for menu planning and identifying acceptable competitive foods, CEs are also likely to have all the needed information to provide menu labeling. However, it is the CEs choice to provide this information.

### Additional Resources

The following resources may be helpful for CEs developing and implementing an effective system for retaining food product documentation:

- *Food Buying Guide for Child Nutrition Programs (FBG)*  
Available at [www.foodbuyingguide.fns.usda.gov/](http://www.foodbuyingguide.fns.usda.gov/)
- *Food Labeling: Calorie Labeling of Articles of Food in Vending Machines*  
Available at [www.federalregister.gov/articles/2014/12/01/2014-27834/food-labeling-calorie-labeling-of-articles-of-food-in-vending-machines](http://www.federalregister.gov/articles/2014/12/01/2014-27834/food-labeling-calorie-labeling-of-articles-of-food-in-vending-machines)
- *Food Labeling; Nutrition Labeling of Standard Menu Items in Restaurants and Similar Retail Food Establishments*  
Available at [www.federalregister.gov/articles/2014/12/01/2014-27833/food-labeling-nutrition-labeling-of-standard-menu-items-in-restaurants-and-similar-retail-food](http://www.federalregister.gov/articles/2014/12/01/2014-27833/food-labeling-nutrition-labeling-of-standard-menu-items-in-restaurants-and-similar-retail-food)
- *National Nutrient Database for Standard Reference*  
Available at <https://fdc.nal.usda.gov/>

- *Overview of FDA Labeling Requirements for Restaurants, Similar Retail Food Establishments and Vending Machines*  
Available at [www.fda.gov/food/food-labeling-nutrition/overview-fda-labeling-requirements-restaurants-similar-retail-food-establishments-and-vending](http://www.fda.gov/food/food-labeling-nutrition/overview-fda-labeling-requirements-restaurants-similar-retail-food-establishments-and-vending)
- *USDA, Agricultural Marketing Service, Grades and Standards*  
Available at [www.ams.usda.gov/grades-standards](http://www.ams.usda.gov/grades-standards)
- *USDA, Agricultural Marketing Service, Country of Origin Labeling (COOL)*  
Available at [www.ams.usda.gov/rules-regulations/cool](http://www.ams.usda.gov/rules-regulations/cool)  
USDA, CN Labeling  
Available at [www.fns.usda.gov/cn/labeling-program](http://www.fns.usda.gov/cn/labeling-program)

## TDA Resources

The following TDA forms may assist CEs in obtaining an acceptable product formulation statement from manufacturers. These resources are available at [www.SquareMeals.org](http://www.SquareMeals.org).

- *Product Formulation Statement for Grains Product—Statement Template*
- *Product Formulation Statement for Meat/Meat Alternate Products (M/MA)—Statement Template*
- *Product Formulation Statement for Fruit Products—Statement Template*
- *Product Formulation Statement for Vegetable Products—Statement Template*

## Records Retention

Appropriate documentation and records are essential to the CE's ability to demonstrate that reimbursable meals meet the meal pattern and that additional beverages and food sold meet the competitive food requirements.<sup>20</sup> The following *Administrator's Reference Manual (ARM)* sections provide additional information on records retention related to meal patterns and competitive foods:

- *Section 7, Breakfast Meals*
- *Section 8, Lunch Meals*
- *Section 9, Pre-Kindergarten Meals*
- *Section 10, Afterschool Snacks & Meal*
- *Section 11, Summer Meal Programs*
- *Section 22, Competitive Foods*
- *Section 30, Records Retention*

### Information Box 1

#### Records Retention

Public and charter schools are required to keep documentation related to school nutrition programs for 5 years.

Private schools, other nonprofit organizations, and residential child care institutions (RCCIs) are required to keep documentation for 3 years.

<sup>20</sup> See *Administrator's Reference Manual, Section 20, Counting & Claiming* for additional information on the claims process.



## Summary of Product Documentation

The *Product Documentation Chart* provides a summary of the information contained in the five types of acceptable documentation that a CE may use to demonstrate compliance.

Product Documentation Chart					
	Child Nutrition (CN) Labels	Food Buying Guide (FBG) for School Meal Programs	USDA Foods Fact Sheets for Schools & Child Nutrition Institutions	Nutrition Facts Label	Product Formulation Statements and Manufacturer's Specifications
<b>Description</b>	Provides information on the product crediting contribution.	Provides detailed product crediting information based on volume or weight.	Provides detailed product information on crediting, yield amounts, nutritional values, preparation, and food safety.	Provides information on product crediting contribution by weight/volume and nutritional values.	Provides information on the product potential crediting contribution.
<b>Standard Information Required</b>	Yes	Yes	Yes	Yes	Yes
<b>Reviewed and Monitored</b>	Yes, USDA regulates CN Labels	Yes, USDA develops	Yes, USDA develops	Yes, FDA regulates Nutrition Facts Labels	No
<b>USDA Guarantee Regarding Product Crediting Contribution</b>	Yes	Developed by USDA	Developed by USDA	FDA regulates Nutrition Facts Labels	No
<b>Product Identification Numbers</b>	Each CN Labeled product has a distinct 6-digit identification number.	Yes	Yes	No	Product must be identifiable by name, code number, weight, ingredient listing, etc.

## Compliance

For an Administrative Review, CN Labels, USDA Foods Fact Sheets, the *FBG*, Nutrition Facts Labels, and signed product formulation statements may be used as documentation to demonstrate the crediting contribution of a particular food or product to a reimbursable meal or compliance with the Competitive Food Nutrition Standards. However, a CN Label is the only documentation that is guaranteed to be accurate as long as the product is prepared as instructed.

If a CE is unable to provide documentation or records that demonstrate that menus and beverage and food items served are compliant with the applicable meal pattern or the Competitive Food Nutritional Standards, TDA will request a bill of lading or invoice with the CN Label identification number for menu items or food or beverage items sold. TDA will take additional steps as appropriate based on a review of the bill of lading or invoice.

TDA will take fiscal action, as appropriate, if documentation or records do not demonstrate compliance with the meal pattern or competitive food requirements. CEs with findings in these areas will be required to complete approvable Corrective Action Documentation (CAD).