



Georgia Department of Early Care and Learning

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**Nathan Deal**  
*Governor*

**Amy M. Jacobs**  
*Commissioner*

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## MEMORANDUM

To: Child and Adult Care Food Program (CACFP) Institutions and Summer Food Service Program (SFSP) Sponsors

From: Falita S. Flowers, Nutrition Services Director (*Original Signed*)

Date: April 10, 2015

Subject: CACFP and SFSP Review Process Regarding the Child Nutrition (CN) Label, Watermarked CN Label and Manufacturer's Product Formulation Statement

Legal Authority: USDA Policy Memorandum, CACFP09-2015; SFSP12-2015

"Institution" means a sponsoring organization, child care center, at risk afterschool care center, outside-school-hours care center, emergency shelter, or adult day care center which enters into an agreement with the State agency to assume final administrative and financial responsibility for Program operations.

"Sponsor" means a public or private nonprofit school food authority, a public or private nonprofit residential summer camp, a unit of local, municipal, county or State government, a public or private nonprofit college or university currently participating in the NYSP, or a private nonprofit organization which develops a special summer or other school vacation program providing food service similar to that made available to children during the school year under the National School Lunch and School Breakfast Programs and which is approved to participate in the Program. Sponsors are referred to in the Act as "service institutions."

"Review" means an on-site evaluation of an institution's overall administration, financial responsibility and operation of the Child and Adult Care Food Program (CACFP) or the Summer Food Service Program (SFSP). This includes, but is not limited to, an examination of all CACFP or SFSP records and an observation of a meal service by the Georgia Department of Early Care and Learning (DECAL), the United States Department of Agriculture (USDA), or any of their representatives.

The purpose of this memorandum is to provide CACFP institutions and SFSP sponsors with additional information and clarification on the review process regarding the: 1) Child Nutrition (CN) Label, 2) Watermarked CN Label, and 3) where applicable, the Manufacturer's Product Formulation Statement (PFS).

### Documenting CN Labeled Products Requirements

The CN Label is the gold standard for verifying the crediting of menu items and provides a warranty against audit claims when the product is used according to the manufacturer's instructions. Valid and acceptable documentation for the CN Label is:

- 1) the original CN Label from the product carton; or
- 2) a photocopy of the CN Label shown attached to the original product carton; or
- 3) a photograph of the CN Label shown attached to the original product carton. (CN Labels that are photocopied or photographed must be visible and legible.)

### Documenting Watermarked CN Label Requirements

During an Program review, if the original CN Label, or the valid photograph or photocopy of the original CN Label **is not** available, CACFP institutions and SFSP sponsors may provide the Bill of Lading (invoice) containing the product name **and**:

- 1) a hard copy of the CN Label copied with a watermark displaying the product name and CN number provided by the vendor; or
- 2) an electronic copy of the CN Label with a watermark displaying the product name and CN number provided by the vendor.

### Product Formulation Statement/Additional Crediting Information

Reviewers **must not** request a PFS or additional crediting information when a valid CN Label or watermarked CN Label is provided by program operators. The PFS should only be requested when reviewing a processed product *without* a CN Label (see attached flowchart - Verifying Acceptable Documentation of CN Labels During a Review).

### CN Label Verification System

USDA Food and Nutrition Service (FNS) is currently working with the Agricultural Marketing Service to develop a CN Label verification system. This system will assist DECAL during the review process, to verify the status of a CN Label as well as the crediting information. The expected completion date for this verification system is Fall 2015. Once the CN Label verification system is fully operational, DECAL may use this system to verify crediting information and the validity of the CN number on a CN Label.

*(See also DECAL policy memorandum, CN Labels Copied with a Watermark - Acceptable Documentation, dated April 10, 2015.)*

For questions concerning this memorandum, please contact Sonja Adams, Policy Administrator at (404) 651-8193.

cc: Deidria W. Bolden, Assistant Commissioner for Federal Programs and Administration, DECAL

# VERIFYING ACCEPTABLE DOCUMENTATION OF CN LABELS DURING A CACFP or SFSP REVIEW

Is the following provided?

