

USING PRODUCT FORMULATION STATEMENTS

in the Child and Adult Care Food Program (CACFP)

CACFP facilities, including child care centers, family day care homes, emergency shelters, at-risk afterschool care centers, and adult day care centers, must be able to document that commercially prepared foods such as pizza, cheese ravioli and breaded chicken nuggets meet the U.S. Department of Agriculture (USDA) CACFP meal pattern requirements, and provide the actual amount of the component being credited. For example, to credit a commercially prepared burrito as 2 ounces of meat/meat alternates, the CACFP facility must obtain manufacturer documentation that indicates the specific amount of meat, beans and cheese in one serving.

Menu planners cannot determine the amount of meat/meat alternates in a food by reading the product's nutrition facts label or ingredients. When purchasing a commercial product without a Child Nutrition (CN) label, CACFP facilities must obtain a product formulation statement (PFS) that demonstrates how the product contributes to the meal pattern requirements.



Manufacturers develop a PFS to provide specific information about a product. The PFS generally includes a detailed explanation of what the product contains and the amount of each ingredient in the product by weight. However, these statements are not regulated, and their information varies from manufacturer to manufacturer. A PFS that provides crediting information for Child Nutrition Programs must:

- indicate how the product credits toward the USDA meal pattern requirements;
- document how the manufacturer obtained the crediting information by citing specific Child Nutrition Program resources or regulations such as the USDA's *Food Buying Guide for Child Nutrition Programs* and USDA policy on crediting foods; and
- be prepared on company letterhead with the signature of a company official and the date of issue. The signature can be handwritten, stamped, or electronic.

Unlike a CN label, a PFS does not provide any warranty against audit claims for reimbursable meals. The USDA does not monitor PFS for compliance with the product's actual formulation or stated contribution to the meal pattern requirements.

Comparison of CN Label and PFS		
Criteria	CN Label *	PFS
Standard information required	Yes	No
Reviewed and monitored by the USDA	Yes	No
Includes USDA guarantee of meal component contribution for Child Nutrition Programs	Yes	No
Distinct six-digit product identification number	Yes	No
* For more information on CN labels, see the CSDE's handout, <i>Using Child Nutrition (CN) Labels in the CACFP</i> .		

The CACFP facility is ultimately responsible when a menu does not meet the CACFP meal pattern requirements. CACFP facilities should check the accuracy of the manufacturer's crediting information on the PFS. All creditable ingredients in the PFS must match a description in the *Food Buying Guide*. CACFP facilities should request supporting documentation from manufacturers, verify the PFS accuracy, and maintain this documentation on file.

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REVIEWING PFS

An appropriate PFS will provide specific information about the product, and show how the meal pattern credit is obtained citing Child Nutrition Program resources or regulations. CACFP facilities must review this information for accuracy using the guidance below.

1. **Review the PFS prior to purchasing processed products.** The USDA has several resources to help CACFP facilities with this process, including a reviewer's checklist and a sample PFS for the meat/meat alternates, grains, fruits, and vegetables components. These documents are available on the USDA's [Food Manufacturers/Industry](#) Web page and the direct links below.

- *Reviewer's Checklist for Evaluating Manufacturer Product Formulation Statements (Product Analysis) for Meat/Meat Alternate (M/MA) Products:*
www.fns.usda.gov/sites/default/files/reviewer_checklist.pdf
- *Product Formulation Statement for Meat/Meat Alternate Products:*
www.fns.usda.gov/sites/default/files/PFSmma.pdf
- *Product Formulation Statement for Documenting Vegetables and Fruits:*
www.fns.usda.gov/sites/default/files/PFSfv.pdf
- *Sample Completed Product Formulation Statement for Vegetables:*
www.fns.usda.gov/sites/default/files/PFSsamplevegetables.pdf
- *Sample Completed Product Formulation Statement for Fruits:*
www.fns.usda.gov/sites/default/files/PFSsamplefruits.pdf
- *Product Formulation Statement for Grains:*
www.fns.usda.gov/sites/default/files/PFSgrains13-14.pdf
- *Sample Completed Product Formulation Statement for Grains:*
www.fns.usda.gov/sites/default/files/PFSsamplegrains.pdf
- *Questions and Answers on Alternate Protein Products (APP):*
www.fns.usda.gov/sites/default/files/APPindustryfaqs.pdf

CACFP facilities can use these resources to determine how a product credits toward the meat/meat alternates, grains/breads, and vegetables/fruits components. Manufacturers may need to modify the USDA PFS forms for various types of commercial products. For example, cheese pizza could have crediting information for the red/orange vegetable subgroup in addition to the meat/meat alternates and grains/breads components.

Manufacturers may use one PFS to document the crediting information for each meal component, but must clearly identify how each component contributes to the CACFP meal pattern requirements.

The five vegetable subgroups of the *Dietary Guidelines for Americans* include dark green vegetables, red/orange vegetables, beans and peas (legumes), starchy vegetables, and other vegetables. The USDA optional best practices recommend that CACFP facilities provide at least one serving of each vegetable subgroup each week.



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2. **Verify the accuracy of the PFS.** To verify the accuracy of a PFS, program operators should consider the information below.
- **Determine that the creditable ingredients listed in the PFS match a description in the *Food Buying Guide for Child Nutrition Programs*.** If a PFS for a specific product claims to provide a higher meal component credit than the amount listed in the *Food Buying Guide*, the PFS must clarify all credited ingredients and demonstrate how the product provides that credit according to USDA regulations, guidance or policy.
 - **Verify that the product's credit toward the meal pattern requirements is not greater than the serving size of the product.** For example, a 2.2-ounce beef patty cannot credit for more than 2 ounce equivalents of meat/meat alternates.
 - **Assure that the creditable components are visible in the finished product.** To claim a meat or meat alternates contribution, the product must have a visible meat or meat alternate such as a sausage link, beans, cheese, or peanut butter, and the method for crediting these items must be specified in the PFS.



The USDA encourages program operators to review product literature carefully, since CACFP facilities are responsible if the meals they serve do not meet the meal pattern requirements.

CN labeled products provide CACFP facilities with a warranty against audit claims when the product is used according to the manufacturer's instructions. A PFS 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 CACFP facility for accuracy prior to the item being included in the reimbursable meal.

For additional guidance on accepting product documentation, see the CSDE's handout, *Accepting Processed Product Documentation in the CACFP*.

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RESOURCES

Accepting Processed Product Documentation in the CACFP:

www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/cacfp/credit/acceptdocCACFP.pdf

Crediting Foods in CACFP Adult Day Care Centers:

www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=322694#crediting

Crediting Foods in CACFP Child Care Programs:

www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=322326#crediting

Food Buying Guide for Child Nutrition Programs:

www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs

Meal Pattern Requirements for CACFP Adult Day Care Centers:

www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=322694#mealpattern

Meal Pattern Requirements for CACFP Child Care Programs:

www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=322326#mealpattern

Tips for Evaluating a Manufacturer's Product Formulation Statement:

www.fns.usda.gov/sites/default/files/cn/manufacturerPFStipsheet.pdf

Using Child Nutrition (CN) Labels in the CACFP:

www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/cacfp/credit/cnlabelcacfp.pdf



For information on the CACFP, visit the Connecticut State Department of Education's (CSDE) [CACFP Web site](#) or contact the [CACFP staff](#) in the CSDE, Bureau of Health/Nutrition, Family Services and Adult Education, 25 Industrial Park Road, Middletown, CT 06457.

This handout is available at

www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/cacfp/credit/pfsCACFP.pdf.

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To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;*
- (2) fax: (202) 690-7442; or*
- (3) email: program.intake@usda.gov.*

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