

**POINTS TO REMEMBER**  
**FOR FACILITATING THE CN LABEL REVIEW PROCESS**

DEC 4, 2009

All manufacturers submitting CN label applications are responsible for providing complete and accurate information. AMS reserves the right to move an application into a pending status when corrections are required.

**Prior to production** All CN labels **must** be approved in FINAL by AMS (& FSIS or NMFS if applicable).

- **Prior to submitting your application, request a CN Number from [CNLabeling@ams.usda.gov](mailto:CNLabeling@ams.usda.gov)**
  - ✓ *Provide: the establishment name where the product will be produced, the establishment number, the product name, and if applicable, the in-house code number.*
  - ✓ *Print sample labels with the CN numbers requested and include the current date in the CN statement.*
  - ✓ *Applications must be submitted to AMS within 6 months or the CN number will expire.*
- **Include all required information** such as fill specifications, formula/sub-formula totals, cooking yields, etc.
  - ✓ *Only include required documentation. Unnecessary information wastes time to determine its relevancy.*
  - ✓ *Please refer to the appropriate manual for required label transmittal information. Manuals are available online at <http://www.fns.usda.gov/cnd/CNlabeling/default.htm>*
  - ✓ *Label and application information **must** be legible or the application **will be rejected**.*
- **Food items receiving CN credit must be described so that they match a description in the *Food Buying Guide for Child Nutrition Programs (FBG)*.** For example, if you are using Ground Beef (no more than 24% fat), then you **must** state, “Ground Beef (no more than 24% fat)” on the transmittal and in the ingredients statement of the label. The FBG is available at: <http://teamnutrition.usda.gov/resources/foodbuyingguide.html>
- **All ingredients used for crediting MUST** be monitored in the Quality Control (QC) program. These items include but are not limited to: ground beef (not more than 30% fat), weight of frankfurter, pepperoni, dry pinto beans, canned drained kidney beans, eggs, dried whole eggs, cheese, cheese substitute, soy protein concentrate, tomato paste (not less than 31% NTSS), diced carrots, whole wheat flour, enriched flour, tortilla, bread, etc.
  - ✓ ***For final approval**, all ingredients used for crediting must be listed in Box 9 as being monitored in the QC program, e.g. “The %’s of ... will be monitored in the Quality Control Program.”*
  - ✓ *Maximum cook yields must also be monitored in the QC program and must be listed in Box 9.*
- **Use of Source labels:** When crediting products that have been processed at another plant or establishment, e.g., pepperoni for use on a pizza, these “source products” must be approved **in FINAL** and must be produced under an approved QC Program.
  - ✓ ***For final approval**, you **must** 1) attach a legible copy of the source product label(s) to each copy of the application or application **will be rejected**, 2) write the six-digit CN number for each source product used on the transmittal, 3) specify “no substitutions”, and 3) include the following statement “The percent of (source name e.g., beef patty crumbles) will be monitored in the Quality Control Program.”*
- **Alternate Protein Products (APP)** (e.g. soy protein isolate), you **must** attach complete manufacturer documentation on supplier letterhead for each APP used - indicate: a) the APP meets requirements in 7 CFR Parts 210, 220, 225, and 226; b) that a portion of non-protein constituents has been removed; c) the PDCAAS score; d) the percent protein on an **as-is** basis (**not** on a moisture-free basis); and e) that the product provides 18 percent protein when fully hydrated. Documentation must identify the common name, brand and code.
  - ✓ *APP documentation should be listed on **one** sheet of manufacturer letterhead (one page for each APP).*
  - ✓ ***For final approval**, include all of the following on all copies of the transmittal: 1) common name of ingredient, 2) the dry weight/ percent of the APP in the formulation, 3) the brand name and code number for each APP used, 4) “no substitutions” after the identity information, and 5) the following statement “The percent of dry (specify common name(s) of APP used e.g., textured soy flour) will be monitored in the Quality Control Program.”*

- **Bread/Bread Alternate:** Include manufacturer documentation providing the percentage of enriched flour, whole grain, bran, or germ when calculating bread/bread alternate based on grams of creditable grains. For batter/breading, provide raw breaded weight, the ratio of batter to breading, and the ratio of water to batter and/or the percent of any liquid added to the batter/breading component. Or, provide component weight.
- **Enriched Macaroni Product:** For final, 1) attach a copy of the FNS approval letter for the Enriched Macaroni Product you are using, 2) specify the product name and company, and 3) indicate “no substitutions.”
- **Transmittal form:** Use the FSIS transmittal form (<http://www.fsis.usda.gov/FSISForms/7234-1.pdf>) as the top page of application for submitting FSIS and AMS inspected/graded meat/poultry/non-meat CN products to ASM.
  - ✓ The transmittal form must include the name and address of the actual plant manufacturing the product.
- **How many copies?** (Refer to [Notice to the Trade: Fee for Child Nutrition Labeling Review and Approvals](#) for information on where to send applications.)
  - ✓ For draft, final or temporary approval: submit 4 copies of transmittals, attached labels, and other required documentation. Submit at most five copies - extra copies will be shredded.
  - ✓ For final approval having prior FNS draft and FSIS approval for the same CN number, submit 2 copies of transmittals, attached labels, other documentation, and one copy of the prior approved transmittal and label. Submit at most 2 copies - extra copies will be shredded.
- **All FNS draft approved labels must be resubmitted to the AMS CN office for FINAL approval.**
  - ✓ *If labels are not resubmitted within 6 months of the draft date, the CN number will expire.*
- **ALL corrections and additions made to the transmittal and label must be incorporated** into the final label application. By incorporating these corrections the company demonstrates to AMS that the changes are acceptable. Final label submittals must be printer proof quality with **no handwritten changes**. All information must be clearly legible. Do not attach labels on top of the application form.
  - ✓ ***For final,** include all comments that were added by AMS to the transmittal form and throughout the applications. For example, if AMS added: “% Cheese, Ground Beef (not more than 20% fat), and Tomato Paste (not less than 31% NTSS) must be monitored in Quality Control Program” make sure this statement has been incorporated electronically on each transmittal form of the application.*
  - ✓ *Additionally, include the following statement in or near Box 13 of all label applications: “Before labeling can be used, the firm must have an approved quality control program on file.”*
  - ✓ ***Labels and applications with handwritten markings will receive, at best, a draft or temporary approval that must be resubmitted for final approval.** “Copies” of AMS edits are not acceptable.*
- **Temporary approvals** will be considered in extreme hardship cases or for plant transfers. Requests must be made on company letterhead and should include the following information: the reason for the request, how many labels are on-hand, and the estimated temporary duration. AMS does **not** have the authority to approve non-meat labels for temporary due to formula changes - FDA consent must be obtained prior to submitta
- **All products that carry the CN logo and statement must be produced under an approved QC Program.** Please remember to attach your approved QC Program Coversheet to all applications.

*If you have any questions, please contact the AMS-CN labeling staff at 202-720-9939.*

Thank you for your cooperation.