



## How to Complete FSIS Form 7234 When Applying for CN Label Approval

### Special Notes Regarding Application Submission

- Use only one method below to submit a label application:
  - ✓ Email to [CNLabeling@ams.usda.gov](mailto:CNLabeling@ams.usda.gov). Compile all necessary documents for each CN number into a PDF file (submit 1 application per email);
  - ✓ Use the Label Submission Approval System (LSAS), which is only applicable to meat/poultry products;
  - ✓ Fax to 202-720-3704; OR
  - ✓ Mail/courier to (Include a duplicate copy for paper applications). Child Nutrition Labeling Program Operations Office  
USDA, AMS, SCP, SCI Division  
Stop 0247, Room 0714-S  
1400 Independence Ave., SW  
Washington, DC 20250
- Applicants are responsible for notifying the Agricultural Marketing Service (AMS) if their application requires Food Safety Inspection Service (FSIS) approval. AMS can directly route the application to FSIS after AMS approval. If AMS routes the application to FSIS, AMS will notify the applicant that it has been sent to FSIS. Once the application is en route to FSIS, the applicant must contact the FSIS Distribution Unit for up-to-date information.
- With the exception of applications that require FSIS approval, approved applications will be returned in the same manner as they were received (e.g., approved applications that were received by email will be returned via email).
- For express application reviews, the applicant must request in writing and identify the CN label application that requires an express review (additional fee applies).

## Tips for the Application Packet

Type the assigned CN number in box 9 of FSIS form 7234.

### Product Formulation (box 15 of FSIS form 7234):

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- All creditable ingredients must match a food item listed in the *Food Buying Guide for Child Nutrition Programs* (available at: <https://foodbuyingguide.fns.usda.gov/>).
- Source items should be identified by their CN number and marked “No Substitutions.”
- Alternate Protein Products (APPs) should be identified by their company name and product code and marked “No Substitutions.”

### Source Items and APPs:

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- Source items must be valid CN products.
- Applications that contain source items that expire within 6 months will not receive final approval. The applicant can choose to replace the source with another source, hold the application until the source is renewed, or receive a temporary approval that is set to expire the same date as the source.
- APPs must have documentation on supplier letterhead for each APP used, indicating: a) the APP meets requirements in 7 CFR Parts 210, 220, 225, and 226; b) 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) the product provides at least 18 percent protein when fully hydrated. Documentation must identify the common name, brand and product code.

### Processing Procedures (box 16 of FSIS form 7234):

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- Fill specifications, cooking yields, piece weights, etc. should be noted in this section.
- The weights or percentages of all creditable ingredients, cook yield, dry yield, piece weights, etc., must be monitored in the Quality Control program and the application should note this statement.
- The breader, batter, and/or predest supplier’s company name and product code must be identified and listed as “no substitutions” for breaded items that use Method 3 to determine the grains credit.

#### CN Statement:

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- All crediting information must be declared to the maximum extent in the CN statement. Companies cannot leave specific crediting information off the CN label if the product is eligible for that credit.
- The meat/meat alternate and grains credit should be expressed to the second decimal point (e.g., 2.00).
- At a minimum, the serving size should be expressed to the second decimal point.

#### Vegetable Credit:

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- The vegetable subgroup must be identified in the CN statement.
- Subgroups may be combined if the minimum credit cannot be fulfilled on its own (e.g., 0.125 quarter cups red/orange vegetable and 0.375 quarter cups starchy vegetable can credit 1/8 cup additional vegetable).

#### Dual Declaration:

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- Products that contain more than 1/8 cup of legumes must dually declare the legumes as both a meat alternate and as a legume vegetable (e.g., 1/8 cup legume vegetable OR 0.50 oz. equivalent meat alternate).
- Any remaining legumes may be added back to the meat/meat alternate credit (e.g., 0.70 quarter cups legume vegetable and 1.20 oz. equivalent meat/meat alternate credit as: 1.75 oz. equivalent meat/meat alternate OR 1/8 Cup Legume Vegetables and 1.25 oz. equivalent meat/meat alternate).

#### Grains Credit:

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- Items that meet the whole grain-rich criteria will be expressed as “oz. equivalent grains” in the CN statement.
- Items that contain predominately enriched grains will be expressed as “oz. equivalent grains (enriched)” in the CN statement.
- For batter/breading items that use Method 1 to calculate the credit: provide the amount of creditable grains in batter and breader (separately) and the total amount of liquid used.
- For batter/breading items that use Method 2 to calculate the credit: provide the weight of the wet breadings and the dry batter.
- For batter/breading items that use Method 3 to calculate the credit: provide the raw breaded weight; the weight or percentage of breadings, batter, and/or pre-dust; and the ratio of water to batter and/or the percent of any liquid added to the batter/breading component.
- If the grain component contains any non-creditable grains (non-whole grain-rich or non-enriched), provide the level of non-creditable grains.
- The following disclaimer is required to appear directly underneath the CN logo if the product contains 2 percent or more non-creditable grains or 0.25 oz. equivalent non-

creditable grains: This product contains grains that are not creditable in school meal programs. Additional grains must be served to meet meal pattern requirements.

### Review Process:

- Regular submissions are typically reviewed within 8-10 business days.
- Express submissions are typically reviewed within 2-3 business days.
- The label reviewer will directly contact the applicant with any comments or questions regarding the application. The application will move into pending status and the review will continue once more information is received.
- If the applicant does not respond after several attempts, the label reviewer will reject the application and the applicant will be responsible for the one-hour administrative fee.
- If the applicant cancels the application after the review process has started, the label reviewer will reject the application and the applicant will be responsible for the one-hour administrative fee.

If you have any questions, please contact the AMS-CN labeling staff at 202-720-9939 or [CNLabeling@ams.usda.gov](mailto:CNLabeling@ams.usda.gov)