MEAL PLANNING AND MENU RECORD REQUIREMENTS

Meal Planning and Developing Menus

In a successfully managed CACFP operation, planning meals and developing menus may be the most crucial step. The nutritional value of meals and compliance with Federal program requirements depend on careful menu planning.

The menu influences almost every aspect of the food service operation, from what foods to purchase and how they are prepared, to whether or not meals are popular with the participants.

When Institutions plan meals for the participants start with the five basic menu planning principles below:

- Strive for balance
- Emphasize variety
- Add contrast
- Think about color
- Consider eye appeal

When planning meals that are nourishing, appealing and taste good, it is important to strive for balance in the flavors and types of foods offered. Serving a variety of foods is important because no one food or group of foods can give participants everything they need for a healthy diet. Variety also makes menus interesting and appealing.

To add variety:

- Include a wide variety of foods from day to day
- Vary the types of main courses served
- Prepare foods in a variety of ways
- Introduce a new or unfamiliar food periodically
It is important to add contrast when planning menus. Strive for contrasts of texture, flavor, and methods of preparation. Always think about color, use a combination of colors that go together well and provide maximum color in the presentation. A good rule of thumb is to use at least two colorful foods in a menu for visual appeal. First impressions will be how the meal looks - consider eye appeal and make sure what is served looks good as well as tastes good.

Try some of the healthy cooking methods below instead of deep-fat frying. Note: deep-fat frying onsite is no longer allowed in the CACFP meal pattern.

Here are some examples of Healthy Cooking Methods

- Roast, Bake, or Broil - Cooking foods, usually at high heat, in the oven
- Sauté, Pan-Fry, and Stir-Fry - Cooking foods with a small amount of hot oil over medium or high heat.
- Grill - Cooking foods by placing them on a pre-heated metal grill, or grill pan, with high heat coming from below the food.

Keep in mind any special considerations when planning the meals, such as:
  - Regional food preferences
  - Holidays and other special occasions
  - Climate and seasons
  - Product availability

Finally, it is important to plan menus according to equipment, space and staffing availability. Institutions and facilities must ensure that in storing, preparing, and serving food, proper sanitation and health standards are met which conform to all applicable Idaho and local laws and regulations. There must adequate facilities available to store food or hold meals. For more information on menu planning please refer to resources available on the FNS website.

Please refer to the Meal Pattern Requirement section of the manual when planning menus to assure each meal or snack offered meets the meal pattern.
CYCLE MENUS

A cycle menu is a series of menus planned in advance, served for a specific time period, and then repeated. SDE recommends cycles of four to six weeks. Some Institutions use a different cycle menu for each season of the year to include seasonal foods. For example, a summer cycle menu may include tomatoes, berries, melons, and other fruits and vegetables in season. Cycle menus save time and money by allowing menu planners to:

- Plan accurately
- Predict food costs
- Reduce waste
- Repeat grocery orders
- Vary meals
- Make food shopping and preparation more efficient

In 2016 the SDE developed and released a menu tool kit to meet the updated meal pattern requirements that includes seasonal cycle menus and standardized recipes. A printed Idaho CACFP Menu Toolkit was provided to all sponsors and facilities participating on the program. An electronic version is available on the SDE website under Child Nutrition Programs and the Child and Adult Care Food Program.
Meal Pattern Menu Compliance Records

CACFP is a Federal program that provides reimbursement to participating Institutions for providing nutritious meals and snacks to participants. Institutions and facilities must plan for and order meals and snacks on the basis of current participant trends, with the objective of providing only one meal per participant at each meal service. Records of participation and of ordering or preparing meals must be maintained to demonstrate positive action toward this objective. Institutions and facilities should make every effort to keep food waste to a minimum. When facilities experience situations of leftover foods, the facility should exhaust all alternatives permitted by Idaho and local health and sanitation codes before discarding food. Options may include “share tables” for eligible facilities, transferring meals to another affiliated center, and refrigerating the food for the next-day use. The facilities must ensure that in storing, reheating, and serving excess meals or food, proper sanitation and health standards are met which conform to all applicable Idaho and local laws and regulations.

Centers and day care homes must keep records of menus (7 CFR 226.15(e)(10)). State agencies have the authority to determine other types of acceptable recordkeeping documents required to demonstrate compliance with the meal patterns (7 CFR 226.15(e)). In Idaho, the state did not impose additional paperwork requirements to demonstrate compliance with the updated meal pattern requirements. The SDE maintained current recordkeeping requirements and update existing forms to avoid any additional burden.

Menu records are also referred to as Meal Pattern Menu Compliance records.

Meal pattern menu compliance records must be maintained in written or electronic format to support all meals and snacks claimed for reimbursement and must be made available to SDE or USDA during program reviews with the Institution and during monitoring visits with the center or day care home. The following meal pattern menu compliance records are required:

- Daily dated menus;
- Standardized recipes;
- Product nutrition fact labels including ingredient list;
- CN Labels and manufacturer’s Product Formulation Statements (PFS);
- In addition to the above records, centers must maintain food receipts/invoices and a
monthly food inventory.

The information provided on these records show the facilities have planned and prepared enough food and milk for the meals or snacks served to participants in attendance and the meals and snacks meet meal pattern requirements.

In addition to the above menu compliance records, centers and homes that provide care for infants must provide to parents, and maintain, a signed Infant Benefit Notification Form for all infants in care. It is important to note that Institutions must offer CACFP meals that meet the infant meal pattern requirements (7 CFR 226.20(b)) to all infants enrolled in care at the center or home. A center or day care home may not avoid this obligation by stating that the infant is not “enrolled” in the CACFP, or by citing logistical or cost barriers to offering infant meals. Decisions on offering CACFP meals must be based on whether the infant is enrolled for care in a participating CACFP center or day care home, not if the infant is enrolled in the CACFP.

The Infant Benefit Notification form describes the infant meal pattern; the type of formula(s) offered by the facility and collects parents’ preferences for feeding their infant. A sample Infant Benefit Notification Form is located in MyIdahoCNP under Download Forms and shown below.
Next is a description of each menu compliance record with examples of SDE sample forms Institutions and their facilities may use in their program operations. If the Institution would like to use a different form(s) the Institution must provide a copy to the SDE for approval prior to implementing the record.

**Daily Dated Menus**

Institutions and facilities (centers and day care homes) are required to maintain daily dated menus which list the menu items prepared and served to participants for each meal or snack service. Some Institutions or facilities choose to serve several meals or snack services throughout the day to participants, but only request approval for a few of them in the site or provider’s application. The Institution and facilities only need to document the
meals and snacks that are approved in the Institution’s site or provider application in MyIdahoCNP to meet CACFP menu record requirements.

**INDIVIDUAL INFANT MENU RECORDS**

Daily dated menu records must be kept for each infant enrolled for care. Since infant diets vary, foods offered must be recorded for each individual infant. Infant menus must document:

- Date (month, day, year)
- The infant’s name and date of birth
- The type of meal (breakfast, lunch, supper or snack)
- Required meal components per meal type
- Minimum portion size per age group
- All actual food items served for each meal/snack
- Brand of formula or expressed breast milk or breast-fed mom
- If food or formula is supplied by the parent/guardian

For the infant meal or snack to be eligible for reimbursement, the Institution must offer at least the minimum serving portion size for each required meal component. If the center or day care home provider offers at least the minimum serving of a required component in one sitting, the provider is only require to document the actual item offered (i.e. expressed breast milk (EB), Formula, or the actual solid food).

If the center or day care home provider offers less than the minimum serving of a required component in one sitting, the provider must document the amount offered in addition to the actual item offered.

Since infant meals must be served consistent with the infant’s eating habits, infants eat on demand facilities are not required to feed infants only at the traditional meal times scheduled for the children.

For a meal or snack to be reimbursable, the minimum serving size must be offered during the meal service time. So what is the meal service time for infants? An infant’s meal service time is the start of the meal service time approved in the center or homes MyIdahoCNP application to the start of the next meal service time, with one exception for the first approved meal served and the last approved meal served. For the first meal served...
the start time may be when the facility opens. For the last meal served the end time may be when the facility closes.

Here is an example of a facility’s (center or home) hours of operation and approved meal times in their MyIdahoCNP application:

![Meal Service Times for Infants](chart)

The hours of operation for the facility are 6:00 am – 7:00 pm. The children approved meal times in the center site application or the provider application are listed in the first column. Meals or snacks for enrolled (if applicable) children ages 1 and up may only be claimed for reimbursement if served in the approved meal times when the meals meet the meal pattern requirements.

Using the example above, let’s determine the infant meal service times. In the example, the facility opens at 6:00 am so the meal service time to document and claim a breakfast for an infant is from 6:00 am to 10:30 am - the start of the approved AM snack time. For the last meal served the start time for the supper is 5:00 pm and the facility closes at 7:00 pm so the meal service time to document and claim a supper for an infant is from 5:00 pm – 7:00 pm.

To document meal services that are served between meal services, the meal or snack service time for infants is the start of the meal service time approved in the center site or
provider MyIdahoCNP application to the start of the next meal service time. Using the example above, to document and claim a lunch, all required components in the minimum serving size must be offered to the infant between 12:00 pm (the start of lunch service) and 2:30 pm (the start of the next approved meal service for the facility).

Since infants are fed on demand, infants may not be offered all required components in the minimum serving sizes in one sitting. When the infant has been offered some of the required components of a meal/snack, the rest of the required food components for that meal/snack must be offered before the next scheduled meal/snack to qualify the meal for reimbursement.

Even though infants shall be fed “on demand” only the meal types approved in MyIdahoCNP for reimbursement for the center or home may be claimed. For example, if “PM Snack” is not an approved meal type for a facility, then PM snacks cannot be claimed for reimbursement, even if the infant is fed mid-afternoon.

Below are instructions on how to record each of the required components on the Individual Infant Menu Record.

**Expressed Breast Milk**

Expressed breast milk offered to infants must be documented on the infant’s menu record either as “EB” or “expressed breast milk”, each time it is offered as part of a reimbursable infant meal or snack.

**Mother Breast Feeding Onsite**

While centers and day care homes must maintain menus to show what foods an infant is served, there is no Federal requirement to document the delivery method for breastmilk (e.g., if it was served in a bottle by the provider or if the mother breastfed on-site). A center or day care home may simply indicate on the menu that the infant was offered breastmilk. Additionally, centers and day care homes do not need to record the amount of breastmilk a mother directly breastfeeds her infant. When the infant is breastfed by mom onsite, document it on the infant’s menu record as “BF” or “breastfed”.
Formula

When formula is offered to an infant, the brand of infant formula offered must also be documented on the form in addition to recording “F” or “formula” under each meal or snack service it is offered. If the brand of formula is not documented on the infant’s menu records, meals and snacks requiring formula as part of the meal pattern may not be claimed for reimbursement.

Solid Foods

Once an infant is developmentally ready to accept solid foods, the center or day care home is required to offer them to the infant. When a solid food item is offered, record the actual food offered to the infant (Ex: Peaches, green beans, chicken, oatmeal infant cereal...). Centers and day care homes must follow the eating habits of the infants, therefore, when introducing solid foods to infant’s, facilities shall start with foods that have already been introduced to the infant by the parent or guardians. Open communication with the parent or guardian and the facility is very important. To document the food items offered by the parent or guardian, the center may use a meal plan form. Below is the optional Individual Infant Meal and Snack Plan form a center or day care home may use to determine when and which solid foods may be served to each individual infant.
Parent Supplied

Food and formula supplied by the parent/guardian must be designated on the infant’s menu record with “PS” for parent-supplied, in addition to the name of the actual food item or formula supplied. For example, if the parent supplies jarred baby food peaches, the infant menu record must document “PS, peaches” for the meal or snack when the item was offered. Staff must designate “PS” every time a required meal pattern component is supplied by the parent/guardian. Staff may not write “PS” on top of the infant menu to cover meals and snacks provided for the entire day, week or month. The “PS” designation is used to verify that only one meal pattern component is supplied by the parent when determining reimbursable meals. If “PS” is not documented on the infant menu, SDE will assume the
food or formula was supplied by the facility.

**Daily Individual Infant Menu Record Form**

The Daily Infant Menu Record form provided in MyIdahoCNP under Download Forms is designed to document each complete reimbursable meal for each infant before the meals are tallied and included in the claim for reimbursement. See example below for infants 6-11 months.

**DAY CARE HOME CHILD MENU RECORDS**

Day care homes are required to maintain daily dated menu records for all meals or snacks the day care home serves and claims for reimbursement. Each item on the menu must be the actual item served, i.e. apple, green beans, cheerios, etc. It is important to denote the meat/meat alternate in a main dish, i.e. beef burrito, chicken fettuccine, etc. Day care homes must indicate on the menu which grain items are whole grain-rich. This could be as simple as writing “whole wheat” or “WW” in front of “bread” so that the menu item reads “whole wheat bread” or “WW bread”; writing WG or “whole grain-rich” in front of a food item, such as “whole grain-rich English muffins” or “WG English muffins”; or having a check box signifying the food is whole grain-rich. The type of milk served per age group must be recorded on the menu records as well.

The following are the requirements for day care home menus:

- Date (month, day, year)
- Provider name
- The type of meal (breakfast, lunch, supper, or snack)
- Minimum serving sizes per age group
- Actual food items served each day
- Type of milk served each day (whole, low-fat or 1%, and fat-free or skim and if the milk is flavored)
- CP (Commercially Prepared) or HM (Home Made) notations
- WG (Whole grain rich) notation

**CENTER CHILD OR ADULT MENU RECORDS**

If a center posts a daily, weekly or monthly menu to the public, the menu posted should match the center’s daily dated menu records. During a SDE or FNS program review of the center, SDE or FNS will refer to the daily dated menu record as the final menu source since it is the daily working document to plan, prepare and serve the meals or snacks.

Each item on the menu must be the actual item served, i.e. apple, green beans, cheerios, etc. It is important to denote the meat/meat alternate in a main dish, i.e. beef burrito, chicken fettuccine, etc. The center must indicate on the menu which grain items are whole grain-rich. This could be as simple as writing “whole wheat” or “WW” in front of “bread” so that the menu item reads “whole wheat bread” or “WW bread”; writing WG or “whole grain-rich” in front of a food item, such as “whole grain-rich English muffins” or “WG English muffins”; or having a check box signifying the food is whole grain-rich. The type of milk...
served per age group must be recorded on the menu records as well.

Centers have the option to use either a detailed menu record or menu production record. Both records will demonstrate how the meals or snacks contribute to the required food components, food items, or menu items for each day of operation. In addition, these records must provide sufficient documentation to determine how the meals and snacks contribute to meeting the age serving size requirements.

No matter which record the center decides to use, they should be completed in advance of purchasing and preparing the food on the menu. Purchasing and preparing food can take up a lot of time if it’s not organized and planned effectively and can result in numerous trips to the grocery store which can be expensive and waste the center’s valuable time.

The detailed menu record or the menu production record, when used in conjunction with standardized recipes, CN labels and product formulation statement documentation are a valuable kitchen tool for forecasting future food preparation when the same or similar menu is planned. Adjusting menu choices, removing unpopular menu items, or increasing or decreasing the quantity of a menu item to be produced are all valid uses for information recorded on these records.

**Center Detailed Menu Record**
The detailed menu record is a streamlined tool to document the daily menus of meals and snacks planned, prepared and served to participants.

Detailed menu records must document:
- Date (month, day, year the meals were served)
- Site location(s)
- Serving sizes by each age group for all required components
- Actual food items served each day
- Type of milk served each day (whole, low-fat or 1%, and fat-free or skim and if the milk is flavored)
- Substitutions made to the planned menu
- CP (Commercially Prepared) or HM (Home Made) notations
- WG (Whole grain rich) notation
- Name of recipe matching the item on the menu
- Planned number of portions per age group
- Prepared number of portions per age group
- Served number of portions per age group

### Center Menu Production Records

A menu production record is a valuable tool that helps program operators to plan ahead so the correct amount of food is purchased and prepared to meet the CACFP menu pattern.

Menu production records must document:

- Date (month, day, year the meals were served)
- Site location(s)
- Actual food items served each day
- Type of milk served each day (whole, low-fat or 1%, and fat-free or skim and if the milk is flavored)
- Substitutions made to the planned menu
- CP (Commercially Prepared) or HM (Home Made) notations
- WG (Whole grain rich) notation
- Name of recipe matching the item on the menu
- All items to meet the menu pattern weight or volume amounts (ounces, pounds,
cups, or number of servings, etc.)

- Planned portions per age group
- Prepared portions per age group
- Served portions per age group
- Leftovers

Leftovers – the amount of each food component that was prepared and not served to the participants. For Institutions using family style meal service, recording leftovers, especially the food component that may be re-used, assists the Institutions in determining how much of each food component the participants actually served themselves. This information will be used by SDE during Program reviews to determine if the Institution purchased enough food to meet the meal pattern based on the participant’s service.

SDE has two menu production records available for centers: Production Record A and Production Record B. Both are located in MyIdahoCNP under Download Forms. Centers may also use an approved food service software system with a menu production record or create their own form. The form must be approved by SDE before using in the center. Below is a sample of Production Record A.

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**Standardized Recipes**

USDA-What’s Cooking, Team Nutrition and the Idaho Menu Toolkit are great resources for
A standardized recipe is one that has been tried, adapted and retried several times for use by a given food service operation and has been proven to produce the same good results and yield every time when the exact procedures are used with the same type of equipment and the same quantity and quality of ingredients. A standardized recipe lists the total yield, the number of servings and the size of each serving.

Standardized Recipes must include the following:

- Recipe name
- Number of Servings recipe will yield
- Ingredients and description of each (cooked, raw, chopped, shredded, etc.)
- Weight or volume measure of each ingredient
- Preparation instructions (directions)
- Cooking temperature and time
- Serving size of the finished product
- Recipe yield (total number of servings the recipe makes, or total measured amount such as 1 gallon, two 11” x 13” pans cut in 24 pieces, etc.)
- Contributions to meal pattern (Meat/Meat Alternate, Grains, Vegetables, or Fruits)

Below is a sample form for standardizing recipes:
The USDA Food Buying Guide (FBG) and the FNS Crediting Handbook are the ultimate references for crediting meal components in CACFP meals. Both resources will be used when determining the amount of food to purchase and prepare on the detailed menu records or menu production records or when standardizing and crediting a recipe.

The FBG is the principal tool to determine the contribution that foods make toward meal requirements regardless if foods are produced on site or purchased commercially. The interactive Food Buying Guide allows for easy searching, navigating, and displaying of content. In addition, users can compare yield information, create a favorite foods list, and access tools, such as the Recipe Analysis Workbook (RAW) and the Product Formulation Statement Workbook. The Crediting Handbook is a supplementary resource to the Food Buying Guide with additional information on creditable foods in CACFP. Please note the Crediting Handbook does not replace the Food Buying Guide, but is a valuable supplement.

The FBG is used to determine how much food to purchase or prepare for the number of
portions planned, or how to credit one portion of a recipe. The FBG is divided into sections according to meal pattern components: Meat/Meat Alternate, Vegetables, Fruits, Grains, and Milk. Each section provides information on how to determine the creditable amount or the number of servings of a given size from each purchase unit of the food. For example, the FBG specifies one pound of raw ground beef with no more than 20% fat will provide 11.8 one ounce portions of cooked, drained lean meat.

The USDA interactive web-based Food Buying Guide (FBG) is located at https://foodbuyingguide.fns.usda.gov/.

**Product Nutrition Facts Labels with Ingredient Lists**

Institutions and facilities are required to maintain product Nutrition Facts labels that include the product ingredient list and product name to support all food items served in claimed meals and snacks meet the meal pattern requirements. It is the sponsor’s and state agency’s responsibility to verify the food items served are creditable and the serving size meets the meal pattern requirements when verifying the claim and at on-site reviews with centers and day care homes. This includes reviewing product labels and other product information. Grain labels are used to determine if the grain is creditable, if it is whole grain-rich, and the serving size per age group; and for cereals, if the cereal meets the sugar limits. Below is an example for determining if a grain is creditable to the meal pattern and what would be the minimum serving size to meet by using the Nutrition Facts label, product ingredient list and Exhibit A in the Food Buying Guide.
Is this grain a creditable grain to the meal pattern?

Yes. A grain must be enriched, fortified or whole grain to be credited to the meal pattern. Under the ingredient list on the cracker label, the first ingredient is enriched flour. This product is enriched and is a creditable grain.

What is the minimum serving size of this product to meet one serving requirement for children ages 6-12 and 13-18?

Based on the Nutrition Facts label for this savory cracker, 1 serving is 26 crackers or 30 grams. Using the Exhibit A chart, savory crackers is listed under Group A. In Group A the minimum serving size for 1 serving is 20 grams or .7 oz. To determine the minimum serving size, divide the minimum serving size in grams in Group A by the serving size in grams for the cracker. In this case, 20 grams divided by 30 grams equals .667. Use this factor, and multiply it by the number of crackers in a serving from the nutrition facts label (.667 times 26 crackers equals 17.342). When determining serving size always round up, so for the savory cracker 18 crackers meets the minimum serving for children ages 6-12 and 13-18 years of age.
The Nutrition Facts label is important for determining whether a non-dairy beverage is creditable. For example, the Nutrition Facts label for soy milk is used to determine if the milk substitute meets the nutritional equivalence to cow’s milk. Below is an example for determining if a milk substitution meets the nutritional requirements by using the Nutrition Facts label and the nutritional requirements for milk substitutions chart.

<table>
<thead>
<tr>
<th>Nutrient</th>
<th>Nutrients per Cup</th>
<th>RDI</th>
<th>%DV</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potassium</td>
<td>349 mg</td>
<td>3500 mg</td>
<td>10%</td>
</tr>
<tr>
<td>Protein</td>
<td>8 g</td>
<td>50g</td>
<td>16%</td>
</tr>
<tr>
<td>Vitamin A</td>
<td>500 IU</td>
<td>5000 IU</td>
<td>10%</td>
</tr>
<tr>
<td>Calcium</td>
<td>276 mg</td>
<td>1000 mg</td>
<td>27.60%</td>
</tr>
<tr>
<td>Vitamin D</td>
<td>100 IU</td>
<td>400 IU</td>
<td>25%</td>
</tr>
<tr>
<td>Riboflavin</td>
<td>0.44 mg</td>
<td>1.7 mg</td>
<td>25.90%</td>
</tr>
<tr>
<td>Vitamin B-12</td>
<td>1.1 mcg</td>
<td>6.0 mcg</td>
<td>18.30%</td>
</tr>
<tr>
<td>Phosphorus</td>
<td>222 mg</td>
<td>1000 mg</td>
<td>22.20%</td>
</tr>
<tr>
<td>Magnesium</td>
<td>24 mg</td>
<td>400 mg</td>
<td>6%</td>
</tr>
</tbody>
</table>

Does this milk substitute meet the nutritional requirements?
No. When comparing the nutrients on the Nutrition Facts label to the requirements, this milk substitution is too low in potassium, protein and calcium; and vitamin B-12, phosphorus and magnesium are undetermined since they are not listed on the label.
Yogurt labels are used to determine if the yogurt meets the sugar limit and is creditable to meal pattern. Below is an example for determining if a yogurt meets the sugar limits using the Nutrition Facts label from the yogurt container or package and the sugar limit chart.

Note: The wallet sugar limit card provided by SDE provides more serving size options than what is listed below and is a good resource when determining if a yogurt or cereal meets the sugar limits.

Example #1: Serving Size in Ounces

- Step 1: Find the Nutrition Facts Label on the package
- Step 2: Identify the serving size: 6 oz.
- Step 3: Find the amount for Sugars: 19 grams

<table>
<thead>
<tr>
<th>Yogurt Sugar Limits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Serving Size (Ounces)</td>
</tr>
<tr>
<td>----------------------</td>
</tr>
<tr>
<td>2.25 ounces</td>
</tr>
<tr>
<td>3.5 ounces</td>
</tr>
<tr>
<td>4 ounces</td>
</tr>
<tr>
<td>5.3 ounces</td>
</tr>
<tr>
<td>6 ounces</td>
</tr>
<tr>
<td>8 ounces</td>
</tr>
</tbody>
</table>

Does this yogurt meet the sugar limit?

Yes. The serving size of the yogurt is 6 oz. or 170 grams; the sugar limits for this serving size from the chart is 0-23 grams. The amount of sugar in grams for this yogurt is 19 grams (on the Nutrition Facts label). Since 19 grams is within the 0-23 grams limit, the yogurt meets the sugar limit.

Please refer to the FNS Crediting Handbook for any questions concerning whether a food product is creditable to the meal pattern before purchasing or serving the item.

Child Nutrition (CN) label or Manufacturer’s Product Formulation Statements (PFS)

Either a CN Label or Product Formulation Statement is required for all commercially processed meat/meat alternate or combination food items that are served and counted toward meal pattern components.
Note: Some CN labeled food products require a very large portion size to meet minimum Meat/Meat Alternate meal pattern requirements. For this reason, some CN labeled food products may not be good menu items for Child and Adult Care Food Programs serving young participants. Be sure to check CN labels for serving sizes to determine if the product is suitable for your Program.

CHILD NUTRITION (CN) LABELING PROGRAM (APPENDIX C TO PART 226)

The Child Nutrition (CN) Labeling Program is a voluntary technical assistance program administered by the Food and Nutrition Service (FNS) in conjunction with the Food Safety and Inspection Service (FSIS), and Agricultural Marketing Service (AMS) of the U.S. Department of Agriculture (USDA) and National Marine Fisheries Service of the U.S. Department of Commerce (USDC) for the Child Nutrition Programs. This program essentially involves the review of a manufacturer’s recipe or product formulation to determine the contribution a serving of a commercially prepared product makes toward meal pattern requirements and a review of the CN label statement to ensure its accuracy.

Products eligible for CN labels are as follows:

- Commercially prepared food products that contribute significantly to the meat/ meat alternate component of meal pattern requirements of 7 CFR 210.10, 225.21, and 226.20 and are served in the main dish.
- Juice drinks and juice drink products that contain a minimum of 50 percent full-strength juice by volume.

The following definitions apply:

- CN label is a food product label that contains a CN label statement and CN logo as defined in the paragraph below.
- The CN logo (as shown below) is a distinct border which is used around the edges of a “CN label statement”.

![CN Logo Diagram]
The CN label statement includes the following:

1. The product identification number (assigned by FNS),

2. The statement of the product’s contribution toward meal pattern requirements of 7 CFR 210.10, 220.8, 225.21, and 226.20. The statement shall identify the contribution of a specific portion of a meat/meat alternate product toward the meat/meat alternate, bread/bread alternate, and/or vegetable/fruit component of the meal pattern requirements. For juice drinks and juice drink products the statement shall identify their contribution toward the vegetable/fruit component of the meal pattern requirements.

3. Statement specifying that the use of the CN logo and CN statement was authorized by FNS, and

4. The approval date. For example:

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This 3.00 oz serving of raw beef pattie provides when cooked 2.00 oz equivalent meat for Child Nutrition Meal Pattern Requirements. (Use of this logo and statement authorized by the Food and Nutrition Service, USDA 05-84.)
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Federal inspection means inspection of food products by FSIS, AMS or USDC.

Food processors or manufacturers may use the CN label statement and CN logo under the following terms and conditions:

- The CN label must be reviewed and approved at the national level by the Food and Nutrition Service and appropriate USDA or USDC Federal agency responsible for the inspection of the product.
- The CN labeled product must be produced under Federal inspection by USDA or USDC. The Federal inspection must be performed in accordance with an approved partial or total quality control program or standards established by the appropriate Federal inspection service.
- The CN label statement must be printed as an integral part of the product label along
with the product name, ingredient listing, the inspection shield or mark for the appropriate inspection program, the establishment number where appropriate, and the manufacturer’s or distributor’s name and address.

The inspection marking for CN labeled non-meat, non-poultry, and non-seafood products with the exception of juice drinks and juice drink products is established as follows:

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INSPECTED BY THE
U.S. DEPT. OF AGRICULTURE
IN ACCORDANCE WITH
FNS REQUIREMENTS
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Yields for determining the product’s contribution toward meal pattern requirements must be calculated using the Food Buying Guide for Child Nutrition Programs (Program Aid Number 1331).

In the event a company uses the CN logo and CN label statement inappropriately, the company will be directed to discontinue the use of the logo and statement and the matter will be referred to the appropriate agency for action to be taken against the company.

Products that bear a CN label statements carry a warranty. This means that if a food service authority participating in the child nutrition programs will not have an audit claim filed against it for the CN labeled product for noncompliance with the meal pattern requirements of 7 CFR 210.10, 220.8, 225.21, and 226.20. If a State or Federal auditor finds that a product that is CN labeled does not actually meet the meal pattern requirements claimed on the label, the auditor will report this finding to FNS. FNS will prepare a report of the findings and send it to the appropriate divisions of FSIS and AMS of the USDA, National Marine Fisheries Services of the USDC, Food and Drug Administration, or the Department of Justice for action against the company. Any or all of the following courses of action may be taken:

1. The company’s CN label may be revoked for a specific period of time;
2. The appropriate agency may pursue a misbranding or mislabeling action against the company producing the product;
3. The company’s name will be circulated to regional FNS offices;
4. FNS will require the food service program involved to notify the State agency of the
labeling violation.

**CN LABELED PRODUCT DOCUMENTATION REQUIREMENTS**

Institutions and facilities must maintain records of original CN Labels from the product carton, or photocopies or photographs of the original CN Labels to provide at program reviews as acceptable and valid documentation. Photocopies or photographs of the CN Label shown attached to the product carton are acceptable documentation. CN Labels that are photocopied or photographed must be visible and legible.

Watermarked CN labels - if the original CN label, or the valid photograph or photocopy of the original CN Label is not available, Institutions 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.

Since CN Labeled products provide Institutions and facilities with a warranty against audit claims when the product is used according to the manufacturer’s instructions, SDE will not request a Product Formulation Statement or additional crediting information when a valid CN Label or watermarked CN label with Bill of Lading (invoice) is provided during a Program review.

Grain products with a CN Label indicating the number of oz. eq. grains that meet the whole grain-rich criteria do contribute to the CACFP meal pattern requirements as declared on the CN Label. This is because an oz. eq. is slightly heavier (16 grams of grains) than a serving size for CACFP (14.75 grams of grains). Therefore, the oz. eq. meets the minimum quantity for the CACFP grain component. Please refer to the CN Labeling Program website for more information about qualifying products.

**MANUFACTURER’S PRODUCT FORMULATION STATEMENT (PFS)**
A Product Formulation Statement will provide specific information about the product and show how the credit is obtained, citing CN program resources and/or regulations. The statement must be obtained from the food manufacturer, and is not a nutrition label or a product spec sheet from a salesperson. The product formulation statement for a commercially prepared meat/meat alternate or combination food product must be on the manufacturer’s letterhead and include:

- Product name and product code
- A description of all ingredients as listed in the Food Buying Guide for Child Nutrition Programs, i.e. grain products must be specified whole grain or enriched;
- The ingredient weight per serving of each ingredient to be credited;
- The weight of ingredients specified as raw or cooked weight; and
- The weight or volume of the product serving size, or the number of pieces per serving.
- Manufacturer’s authorized individual name, signature and telephone number
- Detailed breakdown of how the product credits toward each component of the meal (provides information to calculate crediting).

SDE encourages Institutions and facilities to review product literature carefully since the Institution or facility is responsible if the menus they serve do not meet meal pattern requirements. It is important to note that CN Labeled products provide Institutions and facilities with a warranty against audit claims when the product is used according to the manufacturer’s instructions. A Product Formulation Statement does not provide any warranty against audit claims.

When purchasing a processed product without a CN Label, an Institution or facility may request a signed Product Formulation Statement on manufacturers’ letterhead that demonstrates how the processed product contributes to the meal pattern requirements. The Institution or facility must maintain written or electronic records of supporting documentation. It is the Institution’s and facility’s responsibility to request and verify that the supporting documentation is accurate.
USDA CHILD NUTRITION PROGRAMS TIPS SHEETS

On the next page is the USDA tip sheet for accepting processed product documentation. In addition, the USDA has provided a tip sheet to Child Nutrition Programs for evaluating a manufacturer’s product formulation statement. Both tip sheets are available for all CACFP sponsors in MyIdahoCNP in Download Forms.
CN Labels, factsheets, and product labels provide a way for food manufacturers to communicate with Institutions and facilities about how their products may contribute to the meal pattern requirements for meals served under the Department of Agriculture’s (USDA) Child Nutrition (CN) programs. Below are tips for acceptable documentation:

**CN LABELED PRODUCTS**

- The CN Label provides a warranty against audit claims when the product is used according to the manufacturer’s direction.
- Institutions and facilities may submit an original CN Label, or a photocopy or photograph of the original CN Label during a program review as acceptable and valid documentation. If using a photocopy or photograph of the CN label, please be sure to follow the criteria below:
  - Photocopies of the CN label must be shown attached to the original product carton; or
  - Photographs of the CN label must be shown attached to the original product carton.
  - CN Labels that are photocopied or photographed must be fully visible and legible.
- When a valid CN logo and crediting statement is provided, SDE reviewers will not request a Product Formulation Statement or other additional crediting information.

**WATERMARKED CN LABELS**

- A CN label with a watermark is used when the CN logo and contribution statement are used on product information other than the actual product carton and is presented as a separate document.
- If the original CN label, or the valid photograph or photocopy of the original CN label is not available, program operators may provide the Bill of Lading (invoice) containing the product name and:
  - A hard copy of the CN label copied with a watermark displaying the product name and the CN number provided by the vendor; or
  - An electronic copy of the CN label with a watermark displaying the product name and
CN number provided by the vendor.

PRODUCT FORMULATION STATEMENTS (PFS)/OTHER DOCUMENTATION

- PFS must be on signed letterhead that demonstrates how the processed product contributes to the meal pattern requirements.
- Templates for documenting the meat/meat alternates (M/MA), grains, fruits, and vegetables components are available on the FNS website.
- PFS may be modified for various products contributing to more than one meal component. The crediting information for each meal component may be documented on the same PFS.
- Creditable ingredients listed in the PFS must match a description in the Food Buying Guide. PFS should verify that the product’s contribution to the meal pattern requirements is not greater than the serving size of the product (i.e., a 2.15 ounce beef patty may not credit more than 2.00 ounce M/MA).
- PFS should assure that the creditable components are in the finished product. The creditable component should be easily identifiable. Examples of visible M/MA items might include sausage link, beans, cheese, or peanut butter.

Food Receipts and Invoices

Institutions and sponsored centers must maintain records of the cost and quantity of food purchased, cost reductions, and amount of food used. Required food cost records include: Procurement documents, including bids and contracts, purchase orders, delivery receipts, invoices, canceled checks, itemized cash receipts, purchase records, cost records for transporting, storing, handling and processing that are not included in the purchase price, credits, returns, rebates and inventory records.

Food sales receipts and invoices must include the following information:

- Name of vendor or supplier
- Date of Purchase
- Description or name of item purchased - if information is not clear on receipt-center must record on receipt name of food item.
- Purchase unit – gallons, case, can
- Total number of units purchased
- Gross price per unit
- Any refund, rebate or discounts taken
- Total cost of all items purchased
- Sales tax if applicable
- Total cost with sales tax if applicable

Monthly Food Inventory Record

The monthly food inventory record is a list, with quantities noted, of all food and milk available in the center during the month to prepare the meals and snacks served in the center. The monthly inventory must be derived from either a perpetual or physical inventory system or both. If a center uses a perpetual monthly inventory system, the center must complete a physical inventory at least annually at the end of the program fiscal year (September 30).

A physical or perpetual inventory record must be maintained for each claiming month. Below is a sample monthly physical inventory record form. This record is available to all sponsors in MyIdahoCNP Download Forms.
The monthly inventory records and food receipts and invoices are necessary records for the Institution and sponsored centers to determine the cost of food used each month. All Institutions and facilities, other than day care homes and sponsors of day care homes, must compute the cost of food used in the CACFP monthly. The monthly cost of foods record is a required procurement and financial record. For more information on the cost of food used in CACFP, please refer to FNS Instruction 796-2, revision 4 and the Procurement Requirement section of this manual. Below is the sample Cost of Food Used Worksheet. This worksheet is available in MyIdahoCNP under Download Forms.
Program Review Findings and Meal & Snack Disallowances

SDE coordinators observe a meal service and examine daily meal pattern menu compliance records as part of a program review. When these records are not available to support the meals claimed for reimbursement, those meals will be disallowed and fiscal action may occur if the disallowance is over the allowed threshold.

MEAL PATTERN MENU COMPLIANCE RECORDS FINDINGS AND DISALLOWANCES

- Missing date on daily menu records
- Missing daily dated menu records for meals or snacks claimed for reimbursement
- Missing meal or snack component in daily dated menu records
- Food item or component recorded on menu record does not meet meal pattern requirements and/or is non-creditable to meal pattern
- Missing whole grain rich item on daily menu records-(technical assistance during transition period-see below)
- Missing planned, prepared, and served quantities per age group on daily dated menu records or record does not support enough food was planned, prepared or
served to participants to meet the meal pattern

- Missing Child Nutrition (CN) Labels or Manufacturer’s Product Formulation Statements for commercially prepared meat/meat alternates or combination foods
- Missing standardized recipes

In centers, if the center is missing a daily menu record or the record is incomplete or inaccurate but has the daily posted menu, the center shall provide SDE or FNS their food and milk receipts and monthly inventory to verify the menu was served to the participants. The center is responsible for providing the verification to SDE or FNS. If the receipts or monthly inventory does not support the meal(s) or snacks(s) were served for the missing records, or enough food was available to prepare and serve the meal to the participants in attendance, then the meals and snacks claimed will be disallowed. Missing daily menu records will be the finding for this example.

Some centers use approved food service software systems for menu, recipe and inventory records. The systems calculate the amount of food and milk necessary to serve each meal or snack for the center each day. If the center software system provides documentation to support that enough food was available to prepare and serve the meals and snacks to participants in attendance for each meal and snack claimed for reimbursement, the center is not required to complete SDE daily dated menu records in addition to the software system documentation.

**Transition Period for Updated CACFP Meal Patterns**

FNS established a transition period for the updated CACFP meal patterns for Fiscal Year 2018 (October 1, 2017 through September 30, 2018). The transition period will allow an opportunity to focus on providing technical assistance to Institutions and facilities related to the updated meal patterns. Therefore, during Fiscal Year 2018 (October 1, 2017-September 30, 2018), state agencies and sponsoring organizations must provide technical assistance in lieu of fiscal action when they observe violations related to the updated meal pattern requirements such as not serving a whole grain-rich grain. As long as CNP operators are making a good faith effort to comply with the updated requirements, meals cannot be disallowed and Institutions and facilities cannot be found seriously deficient when meals fall
short of the updated CACFP meal patterns requirements during this transition period.

After the transition period, if center or day care home menu records do not support the facility is serving meals or snacks that meet the updated meal pattern requirements, meals and snacks will be disallowed and fiscal action may occur. For example, if a facility serves a grain but none of the grains served on a given day are whole grain-rich, then the meal with the lowest reimbursement rate where a grain was served would be disallowed. The same process applies to the updated juice requirement, if a center or day care home serves fruit or vegetable juice at more than one meal (including snack), the meal with the lowest reimbursement rate containing juice would be disallowed.
Questions and Answers

CAN A CENTER ONLY COMPLETE THE PLANNED SECTION OF THE DAILY MENU RECORDS?
No, Centers must complete the planned, prepared and served quantities for each meal pattern food component offered on the menu to meet the meal pattern.

ON THE MENU PRODUCTION RECORDS ARE THE LEFTOVERS REQUIRED TO BE RECORDED?
Recording leftovers on the menu production records is not required but is a best practice. For Institutions using family style meal service, recording leftovers, especially the food component that may be re-used, assists the Institutions in determining how much of each food component the participants actually served themselves. This information will be used by SDE during Program reviews to determine if the Institution purchased enough food to meet the meal pattern based on the participant’s service.

CAN AN INFANT MEAL OR SNACK BE CLAIMED IF THE INFANT DOES NOT EAT ALL OF THE OFFERED COMPONENTS?
Yes. If all of the required meal or snack components have been offered at the minimum serving size per age, the meal or snack may be claimed for reimbursement.

CAN CENTERS AND DAY CARE HOMES USE THE WHOLE GRAIN STAMPS FROM THE WHOLE GRAIN COUNCIL TO DETERMINE IF A GRAIN PRODUCT MEETS THE WHOLE GRAIN-RICH CRITERIA?
No. While the Whole Grain Stamps provide useful information on the amount of whole grains a product contains, they are not sufficient documentation to determine if a food is whole grain-rich. Products that display a Whole Grain Stamp may also contain high amounts of non-creditable grains, such as non-enriched refined flour. Therefore, the Whole Grain Stamps from the Whole Grain Council alone are not sufficient documentation to demonstrate a product is whole grain-rich. Centers and day care homes must still review the ingredient list to determine that whole grains are the primary grain ingredient and there are insignificant amounts of non-creditable grains. The rule of three is an easy way to accomplish this.

IN A RECIPE FOR BREAD, WOULD INGREDIENTS LISTED AS 2 CUPS OF WHOLE-WHEAT FLOUR AND 2 CUPS OF ENRICHED, WHITE FLOUR MEET THE WHOLE GRAIN-RICH
**Requirement?**

Yes. A food that contains 2 cups of whole-wheat flour and 2 cups of enriched, white flour would meet the whole grain-rich requirement. This is because it contains 50 percent whole grains and the remaining grains in the food are enriched.

**If a day care home prepares whole grain pancakes from scratch, do they have to have a recipe?**

Yes. Similar to other foods made from scratch, centers and day care homes must have a standardized recipe in order to demonstrate that the pancakes meet the whole grain-rich criteria (if the pancakes are designated as the one whole grain-rich item of the day) or the enriched grain criteria. The standardized recipe is also necessary to show that the yield and serving sizes are adequate.

**If a day care home serves breakfast and snack, and a grain is served at both breakfast and snack, but neither of the grains are whole grain-rich, which meal is disallowed?**

The snack would be disallowed. This is because the snack is the meal with the lowest reimbursement rate that contained a grain. Conversely, if a grain was not served at snack and the grain at breakfast is not whole grain-rich, then the breakfast meal would be disallowed. In that situation, the breakfast meal is the meal with the lowest reimbursement rate that contained a grain.

**If a center or day care home serves breakfast and lunch and the whole grain-rich grain is planned for lunch, but the center or day care home is forced to close before serving lunch due to severe weather, will meals be disallowed?**

No. If a center or day care home is unable to serve the meal with a whole grain-rich grain due to extenuating circumstances, no meals will be disallowed on the basis that the whole grain-rich requirement was not met.