



Georgia Department of Early Care and Learning

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**Nathan Deal**  
*Governor*

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*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: CN Labels Copied with a Watermark - Acceptable Documentation

Legal Authority: USDA Policy Memorandum, CACFP 10-2015, SFSP 13-2015

"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 clarify that a Child Nutrition (CN) Label copied with a marking referred to as a "watermark" is acceptable documentation for a CACFP or SFSP review. 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. Manufacturers may provide schools with a CN label with a watermark during the bidding process. (Original CN labels on product cartons will not have a watermark.)

CACFP institutions and SFSP sponsors should be aware that product information on the CN label with a watermark can be changed. Therefore, institutions and sponsors are encouraged to verify that the CN label with a watermark came from a product that was purchased by the institution or sponsor and accurately reflects that product. This helps to maintain the integrity of the CN Labeling Program by ensuring that the CN Label came from the actual product that was purchased by the CACFP institution or SFSP sponsor. During a review, the institution or sponsor may document CN Labeled products as outlined below:

#### Documenting CN Labeled Product 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. Acceptable and valid documentation for the CN Label includes:

- 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

If the original CN Label from the product carton, 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**:

- 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

When a valid CN Label or watermarked CN Label with Bill of Lading is provided, DECAL will cease requesting additional crediting information such as a manufacturer's Product Formulation Statement (PFS). The PFS should only be requested when reviewing a processed product without a CN Label.

#### 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 reviewers during a review, 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 watermarked CN Label.

*(See also DECAL policy memorandum, CACFP and SFSP Review Process Regarding the Child Nutrition (CN) Label, Watermarked CN Label and Manufacturer's Product Formulation Statement, 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