



Points to Remember

For Facilitating the Child Nutrition (CN) Label Review Process

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).**

General Guidance

1. Before a CN number can be assigned, all applicants must have the following:
 - An approved Quality Control (QC) program **or** a signed letter of intent from the Agricultural Marketing Service (AMS) or National Marine Fisheries Services (NMFS) approving officer; **AND**
 - A signed service agreement and completed billing account application on file with the AMS CN Label Program Operations Office.
2. CN numbers must be issued before an application can be submitted for review.
3. CN numbers are requested via email to CNLabeling@ams.usda.gov. The following information must be included when requesting CN numbers:
 - Product name(s) and Product code(s) (if available),
 - Company name, and
 - Food Safety Inspection Services (FSIS), NMFS, or Food and Nutrition Service (FNS) establishment number(s) where the item(s) will be produced.
4. Each assigned CN number is unique to a specific product name, CN statement, formulation, and establishment number.
5. CN numbers expire 6 months after they are issued, if not associated with an approved CN labeled product.
6. A completed CN Label Application packet includes:
 - A completed FSIS 7234-1 *Application for Approval of Labels, Marking or Device* form,
 - A clear copy of the product label,
 - Clear copies of the source product label(s) and/or Alternate Protein Product(s) (APP) documentation (when applicable), and
 - Copies of breader, batter, and/or predest formulations on supplier letterhead (for breaded items that use Method 3 to determine the grain credit).

7. Applications may be submitted via:

- Email to CNLabeling@ams.usda.gov by compiling all necessary documents for a single CN number into a single PDF attachment (1 application per email); OR
- USDA/FSIS Label Submission Approval System (LSAS) (Meat and Poultry Products only); OR
- Fax to 202-720-3704; OR
- Mail or courier to:

Child Nutrition Labeling Program Operations Office
USDA, AMS, SCP, SCI Division
Stop 0247, Room 0714-S
1400 Independence Ave., SW
Washington, DC 20250

Special notes regarding application submission

- Use only one method, as described above to submit an application.
- Include a duplicate copy for mail application.
- The applicant must notify AMS if the application requires 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 labels will be returned in the same manner as they were received (e.g., approved applications that were received by email will be returned via e-mail).
- For express application reviews, the applicant must state in writing and identify the CN label application that requires an express review (additional fee applies).

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.

Types of CN Label Approvals:

Final Approvals:

- Are required before any product can be labeled with the CN logo.
- Must include all label updates and edits made by AMS prior to printing.
- To avoid delays in production, labels should be resubmitted several weeks before the expiration date.

Subsequent Approvals:

- Are submitted to extend the expiration date.
- Allow companies to adjust the product formulation, add additional source items and APPs if the ingredient statement on the label does not change AND the crediting does not change.
- Allow companies to adjust the raw weight, cooking yield, or drying yield of their product as long as the finished product serving size and crediting information do not change.
- Allow companies to replace creditable ingredients with similar creditable ingredients as long as the product name on the label ingredient statement does not change (i.e., the sub-listing of the main ingredient can be different).
- May keep the original month/year in the CN statement or update it to the current month/year.
- Must provide the reason for requesting a subsequent approval. Include information in box 16 of the application.
- Should be submitted with a complete copy of the last label approval.

Rejected Applications:

- Will be charged a one-hour administration fee.
- May be resubmitted within six months of rejection date or the CN number will expire.

Finalized CN Applications that are rejected by FSIS:

- Must be resubmitted to AMS for subsequent approval with the reason for FSIS rejection clearly noted.
- May require additional AMS review that will result in another label review fee.

Temporary Approvals:

- Temporary approvals will be considered in extreme hardship cases or for plant transfers.
- Requests must be made on company letterhead and include the following information:
 - ✓ the reason for the request;
 - ✓ number of labels on-hand; and
 - ✓ The estimated time-frame the temporary approved labels will be used.
- AMS does not have authority to provide temporary approval for non-meat labels due to formula changes that affect the label statement. Applicants must obtain Food and Drug Administration (FDA) consent prior to submitting to AMS.

Generic Approvals:

- Copies of CN label generic approvals no longer need to be submitted to the AMS office.
- Companies should continue to maintain a separate generic CN label list within their company records.
- Generic approvals that fall under FSIS generic approval do not always meet requirements for a generic approval in the CN program. Changes to the product name, ingredients statement, formulation, CN statement, establishment number, and raw weights/cook yields will require an AMS approval.

Information Not Required as Part of the AMS CN Label Application:

- A copy of the approved QC program. Applicants submitting a label application for the first time only, must attach a copy of the QC coversheet. After the first submission, the QC coversheet is not required to be included with the label application.
- Documentation related to non-creditable ingredients, with the exception of non-creditable grains.
- Information filled in box 14 of FSIS 7234 form.
- Documentation related to another CN item, unless it's being used as a source product.
- Extra documentation or information not pertinent to the CN label review may increase review time in order to determine relevancy.

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