



Child Nutrition Labeling Program Program Coordinator, Reviewer, and Manufacturer Responsibilities

PURPOSE

This document identifies Program Coordinator, Reviewer and Manufacturer responsibilities under the Child Nutrition (CN) Labeling Program.

SCOPE

This procedure addresses manufacturers who produce meat and poultry products under the CN Labeling Program. These manufacturers are most often reviewed by Livestock and Poultry (L&P) Program's, Quality Assessment Division (QAD) personnel.

REFERENCES

[QAD 100 Procedure: QAD Application for Service.](#)

[Application for Service \(LP-109\)](#)

[652A: CN Plant Monitoring Review Checklist](#)

[652B: Quality Control Program Review Checklist](#)

[Industry Guidelines for Preparation of Quality Control Program for Meat, Poultry, Seafood, and Non-meat CN Labeled Products](#)

RESPONSIBILITY

1. Manufacturer Responsibility:

Manufacturers who participate in the CN Labeling program are required to:

- 1.1 Complete an [Application for Service form \(LP-109\)](#) in accordance with [QAD 100 Procedure: QAD Application for Service.](#)

By completing and submitting the application form(s), CN Labeling manufacturers agree to timely fee-for-service payment of services rendered. Failure to abide by the regulations or make timely payments will result in the suspension or revocation of CN Label approvals.

- 1.2 Receive approval of the Quality Control (QC) program, prior to production. QC programs shall be submitted to the QAD CN Coordinator for review and approval using the latest version of the [Industry Guidelines for Preparation of Quality Control Program for Meat, Poultry, Seafood, and Non-meat CN Labeled Products.](#)



1.3 Notify the QAD CN Coordinator on a weekly basis of planned CN Labeling production, include the name of the manufacturer, location, and days of production with each notification. Failure to give advance notification of CN Labeling production may result in the suspension of CN Labeling approvals.

1.4 Submit new or revised QC programs and weekly production schedules to QAD.CNLabel@usda.gov. If submissions cannot be submitted electronically, contact the CN Coordinator for an alternative method.

2. Coordinator Responsibilities

2.1 Represent QAD on the CN Labeling Work Group.

2.2 Provide guidance on CN Labeling to manufacturers and reviewers.

2.3 Provide training on CN Labeling to reviewers.

2.4 Review new and revised CN Labeling Programs, including:

- a. Verify that the Business Operations Branch has received the *Application for Service*.
- b. Submit charges in ABI for hours spent approving new CN programs.
- c. Notify the regions that a new program has been approved and ask for the responsible supervisor assignment.
- d. Make preliminary determination for approval or denial.
- e. Request feedback from the reviewer for each new or revised program.
- f. Make final determination for approval or denial.
- g. Notify the applicant of the determination.
- h. Notify reviewer of the determination.
- i. Notify the CN Labeling Operations Office when a new program is approved.
- j. Add newly approved programs to the CN Quarterly Review Plant Lists.
- k. Add the date for revised programs to the CN Quarterly Review Plant List.

2.5 Post on the [QAD AGNIS CN Labeling Review](#) site, Production Schedules and Quarterly Review Lists.



2.6 CN Label Review Reports:

- a. Review CN Label Review checklists.
- b. Send an official letter to the plant of the final rating.
- c. For plants that receive a Conditional Rating or Unsatisfactory Rating and subsequently provide the required Notice of Corrective Actions, the Coordinator will:
 - 1) Review corrective actions to insure they meet the requirements for CN Labeling Program.
 - 2) Notify the manufacturer of the adequacy of the submitted corrective actions.
 - 3) Notify the reviewer, if a grader performed the review, of the corrective action(s) and its adequacy.
- d. Provide CN Labeling Operations Office with information concerning CN reviews.
- e. Post all CN reviews on the QAD AGNIS CN Labeling Review site.

3. Reviewer Responsibility

3.1 Complete training for CN Labeling Reviews. Training can be completed by reviewing the Power Point training found on the QAD AGNIS CN Labeling Review site and/or shadowing a review.

3.2 CN Label Reviews:

- a. Complete assigned CN reviews by the deadline.
- b. Prior to conducting CN Label Review, check the QAD AGNIS CN Labeling Review site for all updates and production schedules.
- c. Record AMS monitoring of CN Labeled product on the QAD 652A: *CN Plant Monitoring Review Checklist*.
- d. Provide a copy of the QAD 652A: *CN Plant Monitoring Review Checklist* to the plant. Note that all findings are tentative pending review by the CN Coordinator.
- e. Submit the completed CN Review Checklist to CN Coordinator via email.

3.3 Guidance for onsite CN reviews:

- a. Schedule review with the applicant.



- b. Select day of CN production and CN # to be reviewed.
- c. Complete the review checking the applicable box on the checklist (Page 3) for a desk review or production run review.
- d. Complete the review following the checklist, the plant's CN Quality Control Program, and transmittals.

3.4 Guidance for off-site CN reviews:

- a. Schedule the off-site review with the applicant.
- b. Follow the requirements set forth in the QAD 652A: *CN Plant Monitoring Review Checklist* with the exception that the review will be completed off-site instead of onsite.
- c. Request the following information from the applicant. It may be submitted via secure website (set up by the company), Zoom meetings, FaceTime, Video, pictures, delivery service or email (preferred method).
 - 1) Applicants CN Quality Control Program.
 - 2) Applicable documents which should include transmittal for product selected and all production records for day selected.
 - 3) Check the box "Off-site Desk Audit" on page 3 of the checklist.
 - 4) Destroy or delete all documents received by the company.
 - 5) Submit the completed checklist to the Program Coordinator:
QAD.CNLabel@usda.gov.

3.5 Charges

- a. For each manufacturer reviewed, the CN reviewer will enter the travel time, review time, mileage, and per diem, as appropriate, required to complete the review into ABI. If reviewing multiple manufacturers in the same trip, the charges will be prorated among the number of plants reviewed.
- b. The charges for CN reviews are based on the current fees for meat and poultry service. Current fees can be found in [QAD 100: QAD Application for Service](#).
- c. The manufacturer is charged based on the type of service agreement established with QAD regardless of who performs the review.



- 1) For applicants classified as meat, they will either be charged the scheduled or unscheduled rate for services under 7 CFR 54.
- 2) For applicants classified as poultry, they will either be charged the scheduled or unscheduled rate for services under 7 CFR 70.
- 3) For scheduled applicants where a grader assigned to the manufacturer performs the review within the normal working hours of the day, the review is considered part of the service agreement and the applicant will not be charged an additional fee.
- 4) For scheduled applicants where the grader is unable to perform the review within the normal established production schedule, either 1) the grader may charge the applicant overtime to complete the review, or 2) a supervisor will perform the review and assess the applicant charges including travel time, review time, administrative time that includes time to complete the report and enter charges into ABI, mileage, and per diem.
- 5) For unscheduled applicants, the applicant will be charged for the reviewer's travel time, review time, administrative time, including time to complete the report and enter charges into ABI, mileage, and per diem. If reviewing multiple manufacturers in the same trip, the charges will be prorated among the number of manufacturers reviewed.

4. Change of Record

- a. Replaced commitment and resident with scheduled.
- b. Replaced non-commitment and non-resident with unscheduled.
- c. Updated email address.
- d. Replaced CAMS with ABI.
- e. Revised Coordinator Responsibilities 2.4 b, c, j, and k.
- f. Clarified the QAD AGNIS CN Labeling Review site.
- g. Removed 2.8 Charges.
- h. Revised Reviewer Responsibility 3.1.
- i. Added 3.3 Guidance for onsite CN reviews.
- j. Added 3.4 Guidance for off-site CN reviews.



- k. Renumbered 3.3 to 3.5 Charges.
- l. Revised 3.5 b.

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