

Piece Counts on Labels of Products for Use in the Child Nutrition Programs

- PURPOSE:** This instruction sets forth policy concerning piece counts on labels of products used in the Child Nutrition Programs.
- SCOPE:** National School Lunch Program, School Breakfast Program, the Summer Food Service Program for Children, and the Child and Adult Care Food Program.
- DESCRIPTION:** There have been instances where sponsors may have been purchased a Child Nutrition (CN) labeled product based on information found only on a company's fact sheet, but have found counts of individual items short, in at least once incident, by as much as 100 units per case. If the portion count was clearly identified on the label, this problem should not occur.
- There is no regulatory authority to require piece counts on Child Nutrition labeled products, nor is it mandated by the Food Safety and Inspection Service (FSIS) which monitors the Partial Quality Control Program (PQC) for Child Nutrition Labeling. Neither FSIS nor Food and Nutrition Service (FNS) require the net weight to appear on institutional labels, and although the net weight must be stamped on the box at the plant, it is not required on the label for approval.
- In order to correct this problem, FNS is issuing a policy to all companies producing Child Nutrition labeled products to clearly identify the numbers that imply a portion count on the label. Examples of correct methods to identify portion count would be 80/2-ounce portions or 80-count/2 oz. A label with "80/2" and a net weight of 10 pounds would not be approved by FNS as the implied piece count would not be clearly identified.
- Sponsors can protect themselves by requiring the following in their bid specifications:
1. Request a sample for the product and a copy of the product label in addition to the fact sheet for that product.
  2. Require a net weight and for individually portioned products, a portion count on the product label.
  3. A provision for recourse if all terms of the bid are not met as specified in the contract.
- SOURCE:** Letter dated November 26, 1990, from Robert W. Dean, Midwest Region Nutrition Coordinator, Child Nutrition Programs, United States Department of Agriculture.