

Ensuring District Compliance with Healthy Food Certification

Public school districts that choose to implement the healthy food option of Healthy Food Certification (HFC) under [Section 10-215f](#) of the Connecticut General Statutes (C.G.S.) must ensure that all foods and beverages comply with the state statutes. The HFC and Connecticut Nutrition Standards (CNS) requirements apply to all foods sold to students separately from reimbursable meals and all foods served in the Afterschool Snack Program (ASP). The beverage requirements of state statute ([C.G.S. Section 10-221q](#)) apply to all beverages sold to students as part of and separately from reimbursable meals and ASP snacks.

Foods that do not comply with the CNS and beverages that do not comply with the state beverage statute cannot be sold to students on school premises unless the local board of education or governing authority votes to allow exemptions and the following three conditions are met:

- the sale is in connection with an event occurring after the end of the regular school day or on the weekend;
- the sale is at the location of the event; and
- the foods and beverages are not sold from a vending machine or school store.

For detailed guidance on the HFC requirements, refer to the Connecticut State Department of Education's (CSDE) resources, [Exemptions for Foods and Beverages in Public Schools](#), [Requirements for Competitive Foods in HFC Public Schools](#), and [Summary Chart: Federal and State Requirements for Competitive Foods in HFC Public Schools](#); and visit the CSDE's [Healthy Food Certification](#) webpage.

Potential sources of food and beverage sales

The CNS applies to all foods (commercial and made from scratch) sold in the cafeteria, school stores, concession stands, vending machines, fundraisers, and any other sources of food sales to students school premises. The state beverage statute also applies to these sources. Examples of other potential sources of food and beverage sales include, but are not limited to:

- a la carte sales (foods are sold separately from reimbursable meals) in any other Child Nutrition Programs, such as the Seamless Summer Option (SSO) of the National School Lunch Program (NSLP) and the Summer Food Service Program (SFSP) operated by the board of education on school premises;
- adult education programs operated by the board of education (if the food and beverage sales are under the control of the adult education program);
- afterschool programs and activities, such as enrichment programs, extracurricular classes, tutoring sessions, and student clubs;
- classes and educational programs, e.g., culinary programs and family and consumer sciences classes;
- classroom parties and celebrations;
- clubs, organizations, and similar groups;
- family resource centers;

Ensuring District Compliance with HFC

- programs and meetings;
- recipient schools under interschool agreements;
- sports programs and sports competitions, such as games, matches, and tournaments;
- summer school programs (e.g., enrichment or exploratory) operated by the board of education or school governing authority;
- vendors on school premises, e.g., food service management companies (FSMCs), food trucks, caterers, online and mobile food delivery companies, and other outside entities that sell foods and beverages to students; and
- any other programs, organizations, and activities that sell foods and beverages to students on school premises

This document summarizes four strategies to help districts comply with HFC requirements, the CNS, and the state beverage requirements.

1

Verify that all foods comply with the CNS and all beverages comply with the state beverage statute *before* offering for sale to students.

Commercial foods and beverages

Allowable commercial products are indicated on the CSDE's [List of Acceptable Foods and Beverages](#) webpage, which includes brand-specific lists of foods that comply with the CNS and beverages that that comply with the beverage requirements of state statute (C.G.S. [Section 10-221q](#)). For products not listed, schools must determine compliance **before** selling to students. The worksheets in the "[How To](#)" section of the CSDE's [CNS](#) webpage assist schools with determining product compliance with the CNS. For more information, refer to the CSDE's resource, [How to Evaluate Purchased Foods for Compliance with the CNS](#).

The CSDE strongly recommends using the CSDE's List of Acceptable Foods and Beverages webpage to determine which commercial food and beverages may be sold, instead of evaluating items locally. This helps to ensure compliance with the CNS and state beverage statute.

The CSDE encourages schools to submit new product information to the CSDE for review. The CSDE's resource, [Submitting Food and Beverage Products for Approval](#), summarizes the required information and process for submitting products.

Ensuring District Compliance with Healthy Food Certification

Foods made from scratch

Before selling any foods made from scratch to students, schools must be able to document that the recipe's serving complies with the CNS. Recipes with nutrition information are required for the two categories of foods below.

- **Foods prepared from scratch using a recipe:** Examples include entrees sold only a la carte (such as pizza, chef's salad, and chicken nuggets); soups; cooked grains such as rice and pasta with added fat (e.g., oil, margarine, or butter) and salt; cooked vegetables with added fat (e.g., oil, margarine, or butter) and salt; salad with dressing; fruit smoothies; and baked goods such as muffins and cookies. Recipes for these foods must provide the nutrition information per serving.
- **Foods that have additional ingredients added after purchasing:** Examples include popping popcorn kernels in oil; assembling a sandwich; making muffins from a mix and adding butter and eggs; and adding sprinkles to commercial frozen cookie dough. Schools must create a recipe for these foods based on the specific amount of each ingredient, and conduct a nutrient analysis to determine the nutrition information per serving.

If the nutrition information per serving is missing, schools must conduct a nutrient analysis of the recipe. For guidance on how to conduct a nutrient analysis of recipes and evaluate foods made from scratch, refer to the CSDE's resources, [How to Evaluate Foods Made from Scratch for Compliance with the Connecticut Nutrition Standards](#) and [Guidance on Evaluating Recipes for Compliance with the Connecticut Nutrition Standards](#).

2

Provide ongoing information and training to ensure that all groups selling foods and beverages understand the HFC and state beverage requirements and have reviewed all foods and beverages for compliance *before* selling to students.

Ongoing communication is critical for successful implementation of HFC and the state beverage statute. Examples of people to inform about the food and beverage requirements include:

- school principals and other administrators;
- school food service program staff, e.g., school food service director and cafeteria managers;
- culinary arts program staff, e.g., coordinators and teachers (if foods and beverages are sold);
- athletic directors;
- family and consumer sciences teachers (if foods and beverages are sold);
- advisors and coordinators for school stores, kiosks, and school-based enterprises;
- parent groups, school organizations, and individuals who coordinate fundraising activities;

Ensuring District Compliance with HFC

- vending machine operators;
- coordinators of afterschool programs and activities, such as enrichment programs, extracurricular classes, tutoring sessions, and student clubs;
- coordinators of summer school programs (e.g., enrichment or exploratory) operated by the board of education or governing authority;
- vendors on school premises, e.g., FSMCs, food trucks, caterers, online and mobile food delivery companies, and other outside entities that sell foods and beverages to students; and
- other individuals and organizations responsible for coordinating any other food sales to students in the district.

Districts should have procedures in place to ensure that new staff understands the HFC and state beverage requirements. The CSDE recommends regularly reinforcing proper procedures through various communication channels, such as staff meetings, e-mails, written instructions, the district's fundraiser approval form, and the district's website.

3

Decide how to document and monitor compliance *before* beginning HFC implementation.

Districts should develop local procedures for monitoring compliance in all schools, including a process for reviewing and approving fundraisers. The district's designated HFC contact person and other appropriate school staff play a key role in this process, and must be supported by the district's administration. For information on the HFC contact person, refer to the CSDE's resource, [*Responsibilities of HFC District Contact Person*](#).

Before the school year begins, the district should:

- identify what foods and beverages can be sold to students from all sources at school;
- communicate information regarding allowable foods and beverages to all groups selling to students;
- develop a system to review and monitor compliance of food and beverage sales in all schools; and
- develop a system to track fundraising events to ensure they meet the required food and beverage exemption criteria. For information on fundraisers and exemptions, refer to the CSDE's resources, [*Sample Fundraiser Form for Healthy Food Certification*](#), [*Requirements for Food and Beverage Fundraisers in HFC Public Schools*](#), and [*Exemptions for Foods and Beverages in Public Schools*](#).

Ensuring District Compliance with Healthy Food Certification

4

Maintain documentation to demonstrate that all foods comply with the CNS and all beverages comply with the state beverage statute.

Before the school year begins, the district should determine what methods and forms will be used to document compliance. Examples of documentation include a locally developed database or list of acceptable foods and beverages, an inventory of items sold in district vending machines and school stores, a school log system to identify acceptable fundraising events, a description of the process used to ensure that all foods comply with the CNS and all beverages comply with the state beverage statute, and a handout or memo communicating district procedures for evaluating HFC compliance at the school level.

All districts must submit annual HFC documentation to the CSDE by November 30 of each year. Select districts must also submit lists of foods and beverages sold to students from all sources. For more information, refer to the CSDE's resource, *Districts Required to Submit Food and Beverage Lists*.

The annual documentation materials are available in the “[Documents/Forms](#)” section of the CSDE's [HFC](#) webpage. For more information on the documentation requirements, refer to the CSDE's resources, *Guidance for Documenting Compliance with Healthy Food Certification* and *Documentation Requirements for HFC* (presentation).

Resources

Complying with Healthy Food Certification (CSDE presentation):

https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Complying_Healthy_Food_Certification_Presentation.pdf

Connecticut Nutrition Standards (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Connecticut-Nutrition-Standards>

Culinary Programs (Related Resources section of CSDE's HFC webpage):

<https://portal.ct.gov/SDE/Nutrition/Healthy-Food-Certification/Related-Resources#CulinaryPrograms>

Districts Required to Submit Food and Beverage Lists (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Doc/Districts_Required_to_Submit_Lists_Foods_Beverages_HFC_Documentation.pdf

Evaluating Foods for CNS Compliance (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Connecticut-Nutrition-Standards/How-To>

Exemptions for Foods and Beverages in Public Schools (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Food_Beverage_Exemptions_Public_Schools.pdf

Ensuring District Compliance with HFC

Fundraisers (Related Resources section of CSDE's HFC webpage):

<https://portal.ct.gov/SDE/Nutrition/Healthy-Food-Certification/Related-Resources#Fundraisers>

Guidance for Healthy Food Certification Documentation (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Doc/Guidance_Healthy_Food_Certification_Documentation.pdf

Guidance on Evaluating Recipes for Compliance with the Connecticut Nutrition Standards (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Evaluating_Recipes_CNS_Compliance.pdf

Guide to Competitive Foods in HFC Public Schools (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/CompFoods/Competitive_Foods_Guide_HFC.pdf

Healthy Food Certification (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Healthy-Food-Certification>

Healthy Food Certification Documentation (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Healthy-Food-Certification/Documents>

Healthy Food Certification Fundraiser Requirements (CSDE presentation):

<https://portal.ct.gov/-/media/SDE/Nutrition/HFC/HFCPresentationFundraisers.pdf>

How to Evaluate Commercial Food Products for Compliance with the CNS (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Evaluate_Commerical_Food_Products_CNS.pdf

How to Evaluate Foods Made from Scratch for Compliance with the CNS (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Evaluate_Scratch_Foods_CNS_Compliance.pdf

List of Acceptable Foods and Beverages (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/List-of-Acceptable-Foods-and-Beverages>

Questions and Answers on Connecticut Statutes for School Foods and Beverages:

https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Questions_Answers_Connecticut_Statutes_School_Foods_Beverages.pdf

Requirements for Competitive Foods in HFC Public Schools (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Requirements_Competitive_Foods_HFC.pdf

Requirements for Food and Beverage Fundraisers in HFC Public Schools (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Fundraiser_Requirements_HFC.pdf

Ensuring District Compliance with Healthy Food Certification

Requirements for Foods and Beverages in Culinary Programs in HFC Public Schools (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Culinary_Programs_Requirements_HFC.pdf

Requirements for Foods and Beverages in School Stores in HFC Public Schools (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/HFC/School_Store_Requirements_HFC.pdf

Requirements for Foods and Beverages in Vending Machines in HFC Public Schools (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Vending_Machine_Requirements_HFC.pdf

Requirements for Selling Foods and Beverages in Adult Education Programs (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/HFC/AdultEdHFC.pdf>

Resources for Meeting the Federal and State Requirements for Competitive Foods in Schools (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Resources_Federal_State_Requirements_Competitive_Foods.pdf

Responsibilities of HFC District Contact Person (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/HFC/HFC_District_Contact_Responsibilities.pdf

Sample Fundraiser Form for Healthy Food Certification (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Sample_Fundraiser_Form_HFC.docx

School Stores (Related Resources section of CSDE's HFC webpage):

<https://portal.ct.gov/SDE/Nutrition/Healthy-Food-Certification/Related-Resources#SchoolStores>

Submitting Food and Beverage Products for Approval (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/HFC/FBlist/Submitting_Food_Beverage_Products.pdf

Summary Chart: Federal and State Requirements for Competitive Foods in HFC Public Schools (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/CompFoods/Summary_Chart_Requirements_Competitive_Foods_HFC.pdf

Summary of Connecticut Nutrition Standards (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/HFC/CNS/Connecticut_Nutrition_Standards_Summary.pdf

Vending Machines (Related Resources section of CSDE's HFC webpage):

<https://portal.ct.gov/SDE/Nutrition/Healthy-Food-Certification/Related-Resources#VendingMachines>

Ensuring District Compliance with HFC



For more information, visit the CSDE's [Healthy Food Certification](#) and [Connecticut Nutrition Standards](#) webpages, or contact the [HFC coordinator](#) in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This document is available at https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Ensuring_District_Compliance_HFC.pdf.

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