



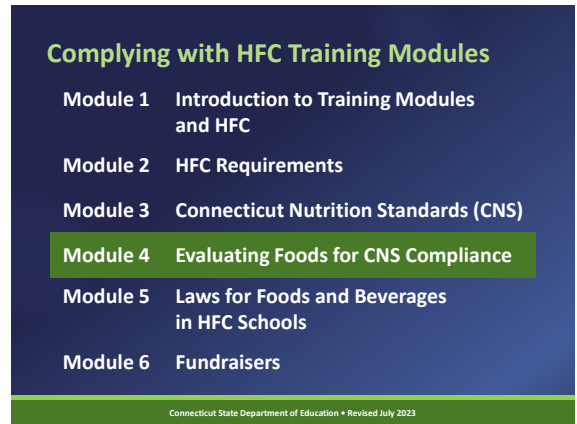
Complying with Healthy Food Certification (HFC)

Module 4: Evaluating Foods for CNS Compliance

Connecticut State Department of Education  
Bureau of Child Nutrition Programs

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Complying with HFC Training Modules

- Module 1 Introduction to Training Modules and HFC
- Module 2 HFC Requirements
- Module 3 Connecticut Nutrition Standards (CNS)
- Module 4 Evaluating Foods for CNS Compliance**
- Module 5 Laws for Foods and Beverages in HFC Schools
- Module 6 Fundraisers

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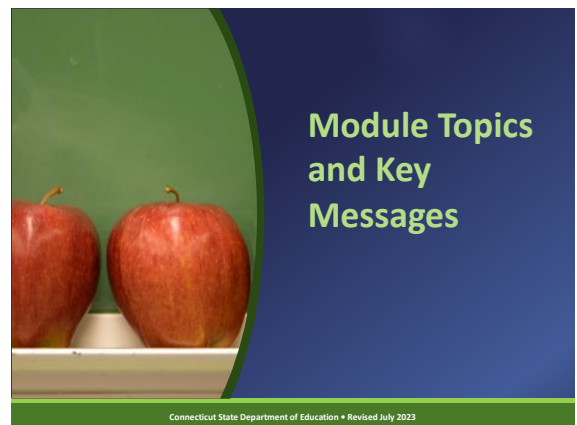
CSDE Resource

Healthy Food Certification webpage

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

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Module Topics and Key Messages

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Module 4 Topics

- Reminder about HFC compliance
- Portion size
- Accompaniments
- How to evaluate commercial food products
- Compliance strategies for commercial food products
- How to evaluate foods made from scratch
- Compliance strategies for foods made from scratch
- Resources

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Key Messages About Evaluating Foods

- Must evaluate all foods before selling
- Commercial foods: Check CSDE's List of Acceptable Foods and Beverages webpage
- Foods made from scratch: Compare standardized recipe's nutrition information per serving with CNS
- Evaluation must include accompaniments

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## Reminder About HFC Compliance


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## Reminder About HFC Compliance

- HFC funding requires CNS compliance
- CNS applies to all foods
  - available for sale to students separately from reimbursable meals
  - served in ASP

Districts must develop and implement procedures to ensure all sources of foods comply with CNS



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## Portion Size

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## CNS Applies to Amount Served

- Entire serving or package
  - Cannot exceed 200 calories
  - Entrees cannot exceed 480 calories



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## Determining Nutrition Information for Package with Multiple Servings

Nutrition Facts	
Serving Size	1 ounce (28g)
Servings per container	2
<b>Amount per serving</b>	
<b>Calories</b>	<b>120</b>
% Daily Values*	
<b>Total Fat</b> 4g	8%
Saturated Fat 0g	
Trans Fat 0g	
<b>Cholesterol</b> 0mg	0%
<b>Sodium</b> 60mg	3%
<b>Total Carbohydrate</b> 16g	5%
Dietary Fiber 1g	6%
Sugars 7g	
<b>Protein</b> 4g	

120 calories x 2 servings = 240 calories

Product does not comply with CNS

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## Accompaniments

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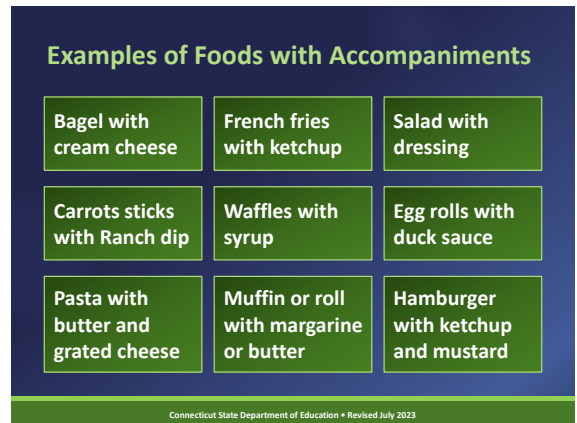
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### Evaluating Foods with Accompaniments


- Many accompaniments cause an approved product to exceed CNS limits



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### How to Evaluate Commercial Food Products



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### Commercial Products

All foods and beverages that are purchased from food manufacturers, distributors, and other sources such as vendors and supermarkets



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### Examples of Commercial Food Products

- Ready-to-eat snack foods
- Prepared foods that are heated or baked
- Fundraiser foods intended for consumption at home, e.g., precooked foods and bulk quantities



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### Use CSDE's List of Acceptable Foods and Beverages



- Approval is specific to brand and variety of each individual product
- Submit products not listed to CSDE

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

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### CSDE Resource

#### Submitting Food and Beverage Products for Approval



[https://portal.ct.gov/-/media/SDE/Nutrition/HFC/FBlist/Submitting\\_Food\\_Beverage\\_Products.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/HFC/FBlist/Submitting_Food_Beverage_Products.pdf)

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## Compliance Strategies for Commercial Food Products

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### Strategies for Commercial Products

1. Clearly communicate what foods and beverages are allowed
2. Evaluate all products for CNS compliance before purchasing
3. Verify vendor assurances that products comply with CNS
4. Check deliveries of foods and beverages when received

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### 1: Clearly Communicate What Foods and Beverages are Allowed

- Based on CSDE's List of Acceptable Foods and Beverages webpage
  - Substitutions are not allowed

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### 1: Clearly Communicate What Foods and Beverages are Allowed

- Inform everyone selling foods and beverages to students
  - Entities, groups, and individuals within and outside district
  - Food service vendors

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### 1: Clearly Communicate What Foods and Beverages are Allowed

- Food service directors and cafeteria staff
- Culinary programs staff
- School store operators
- Vending machine operators
- Fundraiser operators
- Coordinators of school clubs and organizations
- Outside entities
- Other entities

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### 2: Evaluate all Commercial Products Before Purchasing

- Use CSDE's List of Acceptable Foods and Beverages webpage
  - Check for exact product match
- Add nutrition information for accompaniments



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**3: Verify Vendor Assurances of Product Compliance**

- Vendor assurances do not guarantee that product complies with CNS
- Products that comply with Smart Snacks might not comply with CNS
- Check CSDE's List of Acceptable Foods and Beverages
- Submit products to CSDE

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**4: Check Deliveries of Foods and Beverages When Received**

- Designate responsible school staff
- Use CSDE's List of Acceptable Foods and Beverages
  - Develop school-specific list of allowable products

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**4: Check Deliveries of Foods and Beverages When Received**

- Identify steps for handling noncompliant products
  - Refuse delivery and remind vendor substitutions are not allowed
  - Return products to vendor
  - Turn off vending machines

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**Additional Considerations for Fundraisers and Vending Machine Contracts**



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**Fundraisers**

- Implement fundraiser approval process




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**CSDE Resource**

**Sample Fundraiser Form for Healthy Food Certification (HFC)**




[https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Sample\\_Fundraiser\\_Form\\_HFC\\_Introduction.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Sample_Fundraiser_Form_HFC_Introduction.pdf)

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**CSDE Resource**

## Requirements for Food and Beverage Fundraisers in HFC Public Schools




[https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Fundraiser\\_Requirements\\_HFC.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Fundraiser_Requirements_HFC.pdf)

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## More Information on Fundraisers


- Module 6: Fundraisers



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

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## Vending Machine Company Contracts

- District is responsible for ensuring compliance regardless of who owns or operates vending machines

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## Strategies for Vending Machine Company Contracts

- Prevent substitutions of noncompliant products
  - Clearly communicate what foods and beverages are allowed
  - Monitor vending machines

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## 1: Clearly Communicate What Foods and Beverages are Allowed

- Contract language
  - what foods and beverages are allowed
  - substitutions not allowed
  - company must train employees who stock vending machines

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## 2: Monitor Vending Machines


- Designate school staff
- Communicate steps for handling noncompliant products

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**CSDE Resource**

## How to Evaluate Commercial Food Products for Compliance with the Connecticut Nutrition Standards



[https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Evaluate\\_Commercial\\_Food\\_Products\\_CNS.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Evaluate_Commercial_Food_Products_CNS.pdf)

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## How to Evaluate Foods Made from Scratch

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## Foods Made from Scratch

### Two categories

1. Foods prepared from ingredients using a standardized recipe
2. Commercial food products that have ingredients added after purchasing

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## Category 1: Foods Prepared from Ingredients Using a Standardized Recipe



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## Standardized Recipe

A recipe that is tested and adapted for use by the food service operation

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## Format of Standardized Recipes

- Consistent product
- Consistent food quality
- Consistent nutrient content



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### Measurements in Standardized Recipes

- Volume, e.g., quarts and cups
- Weight, e.g., pounds and ounces

Consistent nutrient content




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### Standardized Recipes Required to Determine CNS Compliance

Consistent nutrient content

Accurate nutrient analysis



<https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-School-Nutrition-Programs#StandardizedRecipes>

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### Examples of Foods in Category 1

Foods prepared from ingredients using a standardized recipe

- Entrees
- Salads
- Soups
- Cooked vegetables with added ingredients
- Cooked pasta and rice with added ingredients
- Baked goods

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### Category 2: Commercial Foods with Ingredients Added After Purchasing

- Must evaluate the same way as foods made from scratch

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### Examples of Foods in Category 2

Commercial foods with ingredients added after purchasing

- Popping popcorn kernels with oil and adding salt
- Making cookies or muffins from a mix and adding butter and eggs
- Adding sprinkles to commercial frozen cookie dough



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### Category 2: Commercial Foods with Ingredients Added After Purchasing

Adding ingredients changes nutrition information

1. Develop standardized recipe to identify amount of each "ingredient"
2. Add nutrition information for all ingredients together to determine if serving complies with CNS



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### Category 2: Commercial Foods with Ingredients Added After Purchasing

**Example 1: commercial pancakes served with butter and syrup**

- Number of pancakes
- Amount of butter and syrup




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### Category 2: Commercial Foods with Ingredients Added After Purchasing

**Example 2: popcorn made with oil and salt**

- Amount of popcorn kernels, oil, and salt
- Serving size
- Number of servings




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### Steps to Evaluate Foods Made from Scratch

**1. Check that food has accurate standardized recipe with required nutrition information per serving**

- Calculate information for missing nutrients *before* evaluating for CNS compliance




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### Steps to Evaluate Foods Made from Scratch

**2. Verify that nutrition information per serving (including accompaniments) complies with CNS**

- Enter nutrition information into CNS worksheet for applicable food category

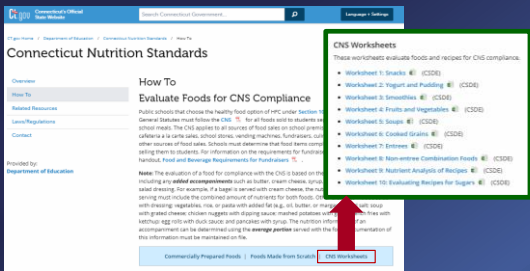


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### CSDSE Resource

#### CNS Worksheets for Evaluating Foods



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

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### Overview of CNS Worksheets

Worksheet	Commercial	Scratch
1: Snacks	✓	✓
2: Yogurt and pudding	✓	
3: Smoothies	✓	✓
4: Fruits and vegetables	✓	✓
5: Soup	✓	✓
6: Cooked grains	✓	✓
7: Entrees Sold Only A La Carte	✓	✓
8: Non-entree combination foods	✓	✓
9: Nutrient analysis of recipes		✓
10: Sugar content of recipes		✓

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### Steps to Evaluate Foods Made from Scratch



- Maintain all CNS compliance documentation on file
  - Standardized recipe
  - Completed CNS worksheet

**Required for annual HFC documentation (due November 30)**

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### Nutrient Analysis of Recipes



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### How to Conduct a Nutrient Analysis



- Determine the nutrition information for each ingredient in the standardized recipe
  - Nutrient analysis software program
  - Nutrition Facts labels
  - USDA FoodData Central Nutrient Database

<https://fdc.nal.usda.gov/>

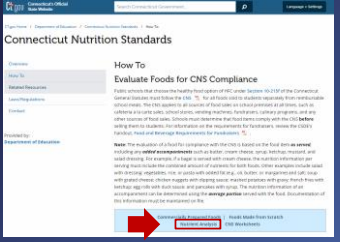
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### How to Conduct a Nutrient Analysis



### Nutrient Analysis Resources




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

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### How to Conduct a Nutrient Analysis



- Determine the nutrition information per serving of the recipe
  - Use CSDE's Excel Worksheet 9: Nutrient Analysis of Recipes
  - Include nutrition information for accompaniments


[https://portal.ct.gov/-/media/SDE/Nutrition/HFC/CNS/CNS\\_worksheet9\\_Nutrient\\_Analysis\\_Recipes.xlsx](https://portal.ct.gov/-/media/SDE/Nutrition/HFC/CNS/CNS_worksheet9_Nutrient_Analysis_Recipes.xlsx)

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### CSDE Resource

### Guidance on Evaluating Recipes for Compliance with the Connecticut Nutrition Standards




[https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Evaluating\\_Recipes\\_CNS\\_Compliance.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Evaluating_Recipes_CNS_Compliance.pdf)

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**CSDE Resource**

## How to Evaluate Foods Made from Scratch for Compliance with the Connecticut Nutrition Standards



[https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Evaluate\\_Scratch\\_Foods\\_CNS\\_Compliance.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Evaluate_Scratch_Foods_CNS_Compliance.pdf)

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## Compliance Strategies for Foods Made from Scratch

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## Strategies for Foods Made from Scratch

1. Clearly communicate CNS documentation requirements
2. Evaluate all foods for CNS compliance before selling

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### 1: Clearly Communicate CNS Documentation Requirements

- Accurate standardized recipe with nutrition information per serving
- Completed CNS worksheet documenting standardized recipe's serving with accompaniments complies with CNS

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### 1: Clearly Communicate CNS Documentation Requirements

- Inform everyone selling foods and beverages to students
  - Entities, groups, and individuals within and outside district

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### 2: Evaluate All Foods for CNS Compliance Before Selling

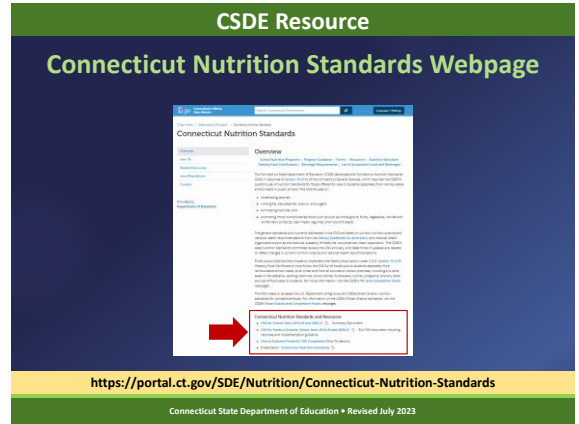
- District's procedures for sales of competitive foods must include process to ensure prior approval

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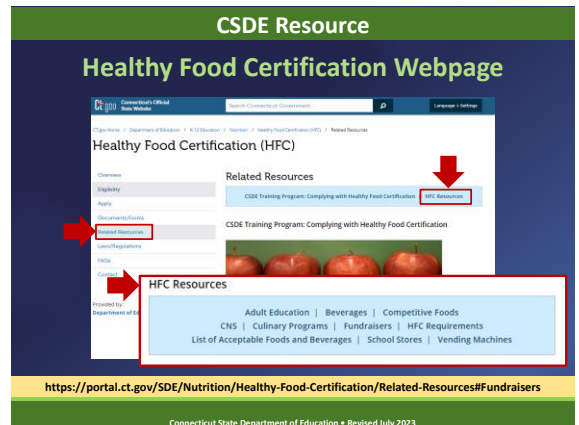
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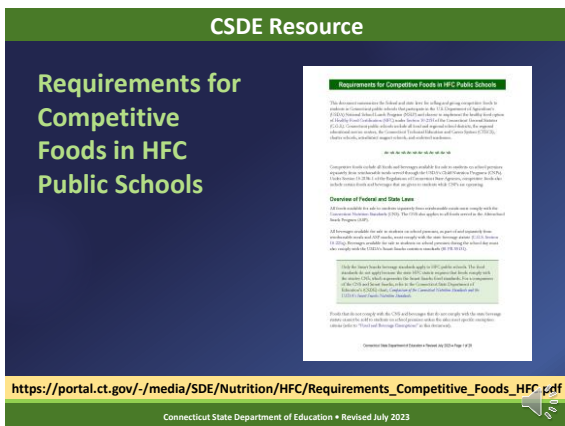
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Thank you for participating in module 4!

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

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1. mail: U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410; or
2. fax: (833) 256-1665 or (202) 690-7442; or
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