



## Complying with Healthy Food Certification (HFC)

### Module 2: HFC Requirements

 Connecticut State Department of Education  
Bureau of Child Nutrition Programs

Revised March 2026

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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

<https://portal.ct.gov/sde/nutrition/healthy-food-certification/hfc-training-program>

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## Healthy Food Certification (HFC)


A state statute that requires each board of education or governing authority for all public schools participating in the NSLP to certify annually to the CSDE whether they will follow the CNS for all foods sold to students separately from reimbursable meals

**Terms to Know**

[https://www.cga.ct.gov/current/pub/chap\\_169.htm#sec\\_10-215f](https://www.cga.ct.gov/current/pub/chap_169.htm#sec_10-215f)

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## Connecticut Nutrition Standards (CNS)

State nutrition standards developed by CSDE that apply to all foods sold to students separately from reimbursable meals in HFC schools

**Terms to Know**

[https://www.cga.ct.gov/current/pub/chap\\_169.htm#sec\\_10-215e](https://www.cga.ct.gov/current/pub/chap_169.htm#sec_10-215e)

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## Topics

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## Module 2 Topics

- When CNS applies
- When CNS does not apply
- Food exemptions
- Common sources of food sales
- Knowledge Check: Test Your HFC IQ
- Resources



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### Key Messages About HFC

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### Overview of Key Messages

- All competitive foods in all schools must comply with CNS
- CNS applies to amount served including accompaniments
- Cannot sell noncompliant foods unless board of education (BOE) votes to allow exemptions and sales meet exemption criteria



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### When CNS Applies

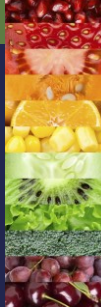
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### CNS Applies To

- All foods available for sale to students separately from reimbursable meals from all sources on school premises \*
- All foods served in USDA's Afterschool Snack Program (ASP) \*

\* Commercial products and foods made from scratch



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### School Premises

All areas of the property **under the jurisdiction** of the local or regional board of education, the Connecticut Technical Education and Career System (CTECS), or the governing authority district or school

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### Sale, Sales, Sell, Selling

Exchange of a determined amount of **money or its equivalent** \* for foods and beverages

\* Coupons, tickets, tokens, and similar items

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### Examples of Sales

1. Coupons and tickets redeemable for foods
2. Fee-based programs and activities that include the cost of food
3. Giving foods in exchange for suggested donation
4. Fundraiser orders and pick-up on school premises



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### Coupons and Tickets

- Selling or giving tickets or similar items that students can exchange for foods and beverages is the same as selling foods and beverages to students




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### Fee-based Programs and Activities

- Charging a fee that includes the cost of foods and beverages provided to students



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### Example 1: Fee-based Programs and Activities

- A school club's dues include cost of snacks



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### Example 2: Fee-based Programs and Activities

- A parent-teacher organization collects money from parents to provide foods at classroom parties



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### Example 3: Fee-based Programs and Activities

- The fee for a weekly afterschool enrichment program includes cost of snacks




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**Example 4: Fee-based Programs and Activities**

- The fee for participating in a sports team includes the cost of foods and beverages




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**Suggested Donations**

- Fundraiser on school premises gives foods to students in exchange for a suggested donation



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**Fundraiser Orders and Pick-up on School Premises**

- Students bring fundraiser orders and money to school and pick up fundraiser foods and beverages on school premises to bring home for delivery to customers




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**Example of Unallowable Fundraiser Orders**

- Students collect money off school premises for orders of frozen cakes and boxes of cookies, then bring the orders and money to school
- When the cakes and cookies arrive at school a month later, students pick them up to bring home for delivery to customers



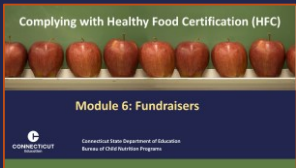
Sales of noncompliant foods to students on school premises

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**More Information About Fundraiser Orders**

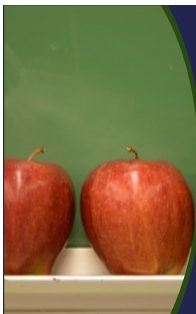
- Module 6: Fundraisers



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**When CNS Does Not Apply**



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**CNS Does Not Apply**

- Sales off school premises
- Sales to adults (teachers, school staff, and parents) on or off school premises
- Sales at events that meet exemption criteria of state HFC statute
- Giving foods to students



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**Give, Giving**

Foods and beverages are provided free of any charge, contribution, or suggested donations; and without the exchange of tickets, coupons, tokens, and similar items to obtain foods and beverages

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**Foods Are "Given" to Students if 5 Conditions Apply**

1. No purchase of foods
2. No exchange of purchased tickets/similar items for foods
3. No exchange of free tickets or similar items for foods
4. Fee-based programs/activities do not include cost of foods provided to students
5. Fundraisers do not give foods to students in exchange for a suggested donation




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**Food Exemptions**

[https://www.cga.ct.gov/current/pub/chap\\_169.htm#sec\\_10-215f](https://www.cga.ct.gov/current/pub/chap_169.htm#sec_10-215f)




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**Noncompliant foods cannot be sold to students unless**

1. BOE votes to allow food exemptions
  - Part of annual HFC statement
2. Food sales meet three exemption criteria of HFC statute



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**Three Exemption Criteria**

1. The sale is in connection with an event occurring after the end of the regular school day or on the weekend
2. The sale is at location of the event
3. The foods are not sold from a vending machine or school store



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**Event**

An occurrence that involves more than just a regularly scheduled practice, meeting, or extracurricular activity

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**Is it an event?**

<p><b>Events</b></p> <ul style="list-style-type: none"> <li>▪ Soccer game</li> <li>▪ High school debate competition</li> <li>▪ School play</li> <li>▪ School chess match</li> </ul>	<p><b>Not events</b></p> <ul style="list-style-type: none"> <li>▪ Soccer practices</li> <li>▪ Debate team practices</li> <li>▪ Play rehearsals</li> <li>▪ Chess club meetings</li> </ul>
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**Examples of Events**

<ul style="list-style-type: none"> <li>▪ Awards banquets</li> <li>▪ Boy Scout Blue &amp; Gold dinner</li> <li>▪ Craft fairs</li> <li>▪ Debate team competitions</li> <li>▪ Election day (if school is not in session)</li> <li>▪ Family bingo nights</li> <li>▪ Math team competitions</li> <li>▪ Mock trial competitions</li> <li>▪ School carnivals</li> <li>▪ School concerts</li> </ul>	<ul style="list-style-type: none"> <li>▪ School recitals</li> <li>▪ School dances</li> <li>▪ School fairs, e.g., health, science, and math</li> <li>▪ Silent auctions</li> <li>▪ Sports banquets</li> <li>▪ Sports games, tournaments, and matches, e.g., football, basketball, soccer, tennis, field hockey, volleyball, wrestling, and cross country</li> <li>▪ Talent shows</li> <li>▪ Theatrical productions</li> </ul>
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**School Day**

The period from midnight before to 30 minutes after the end of the official school day

- Includes summer school programs
- Applies to half days


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**Example of School Day**

<ul style="list-style-type: none"> <li>▪ School ends at 3:00 PM</li> </ul>	<ul style="list-style-type: none"> <li>▪ School day = midnight through 3:30 PM</li> <li>▪ After school day = 3:31 PM through 11:59 PM</li> </ul>
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**Location**

The same place where the event is being held

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### Many Sources of Food Sales are Not Events = NEVER Eligible For Exemptions

- Cafeteria a la carte sales
- School stores
- Vending machines
- Afterschool programs and activities
- Classes and educational programs
- Clubs, organizations, and similar groups
- Programs and meetings
- Summer school programs operated by BOE

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### Many Sources of Food Sales are Never Eligible for Exemptions Because They Are Not Events

- Cafeteria a la carte sales
- School stores
- Vending machines
- Afterschool programs and activities
- Classes and educational programs
- Clubs, organizations, and similar groups
- Programs and meetings
- Summer school programs operated by BOE


**Must always comply with CNS**

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### CSDE Resource

#### Exemptions for Foods and Beverages in Public Schools



[https://portal.ct.gov/-/media/sde/nutrition/hfc/exemptions\\_food\\_beverages\\_public\\_schools.pdf](https://portal.ct.gov/-/media/sde/nutrition/hfc/exemptions_food_beverages_public_schools.pdf)

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### Common Sources of Food Sales



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### Sources of Food Sales in Schools =

- Any entities or individuals that sell foods to students on school premises



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### Examples of Sources of Food Sales in Schools


- A la carte sales
- Vending machines
- School stores, kiosks, and other school-based enterprises
- Fundraisers
- Concession stands
- Sports competitions
- Vendors on school premises
- Celebrations at school
- Afterschool programs and activities
- Classes and educational programs
- Interschool agreements
- Summer school programs operated by BOE
- Adult education programs under BOE

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**Reminder**

- This modules reviews only food sources (CNS)
- CNS does not apply to beverages



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**A La Carte Food Sales**

- Foods sold separately from reimbursable meals in the National School Lunch Program, School Breakfast Program, or any other Child Nutrition Programs that operate in schools

**Terms to Know**





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**Cafeteria A La Carte Food Sales Example 1**

- Selling snacks at lunch, e.g., potato chips, cookies, and ice cream

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**Cafeteria A La Carte Food Sales Example 2**

- Selling foods separately from reimbursable breakfast, e.g., bagels, muffins, and cereal





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**Requirements for A La Carte Food Sales in Cafeterias**

- Must always comply with CNS
- Never eligible for food exemptions




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**CSDE Resource**

**Requirements for Cafeteria A La Carte Foods and Beverages in HFC Public Schools**




[https://portal.ct.gov/-/media/sde/nutrition/hfc/cafeeteria\\_requirements\\_hfc.pdf](https://portal.ct.gov/-/media/sde/nutrition/hfc/cafeeteria_requirements_hfc.pdf)

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### Vending Machines Accessible to Students

- Must always comply with CNS
- Never eligible for food exemptions
- CNS does not apply if vending machines are not accessible to students




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### CSDE Resource

#### Requirements for Foods and Beverages in Vending Machines in HFC Public Schools



[https://portal.ct.gov/-/media/sde/nutrition/hfc/vending\\_machine\\_requirements\\_hfc.pdf](https://portal.ct.gov/-/media/sde/nutrition/hfc/vending_machine_requirements_hfc.pdf)

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### School Stores, Kiosks, and Other School-based Enterprises

- Must always comply with CNS
- Never eligible for food exemptions



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### CSDE Resource

#### Requirements for Foods and Beverages in School Stores in HFC Public Schools




[https://portal.ct.gov/-/media/sde/nutrition/hfc/school\\_store\\_requirements\\_hfc.pdf](https://portal.ct.gov/-/media/sde/nutrition/hfc/school_store_requirements_hfc.pdf)

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### Fundraisers on School Premises

- Must always comply with CNS
  - Selling tickets that can be exchanged for foods
  - Orders and distribution of foods on school premises
  - Giving foods in exchange for suggested donation




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### Fundraiser Exemptions

- May sell noncompliant foods if BOE voted to allow food exemptions
  - AND fundraiser meets exemption criteria
  - OR fundraiser meets definition of event



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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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**CSDE Resource**

**Healthy Fundraising**



[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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**Concession Stands**

**During school day**

- Must always comply with CNS

**After school day or on weekend**

- Eligible for exemptions if located at an event



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**Sports Competitions**

- Games
- Matches
- Tournaments



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**Requirements for Sports Competitions**

**During school day**

- Must always comply with CNS

**After school day or on weekend**

- Eligible for exemptions (meet definition of event)




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**Vendors on School Premises**

**Examples**

- Food service management companies (FSMCs)
- Food trucks
- Caterers
- Online and mobile food delivery companies
- Other outside entities



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**Requirements for Vendors on School Premises**

- Must always comply with CNS
- Never eligible for food exemptions
- Could sell noncompliant foods at events



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**School Celebrations**

**Examples**

- Classroom parties
- Birthday parties
- Holidays
- Cultural events
- Special occasions



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**When School Celebrations Are Selling Foods**

- Collect fee to cover cost of foods provided to students
- Exchange tickets for foods



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**Requirements for School Celebrations**

<b>During school day</b>	<b>After school day or on weekend</b>
<ul style="list-style-type: none"> <li>▪ Must always comply with CNS</li> </ul>	<ul style="list-style-type: none"> <li>▪ Eligible for exemptions (meet definition of event)</li> </ul>




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**Afterschool Programs and Activities**

**Examples**

- Enrichment programs
- Extracurricular classes
- Tutoring sessions
- Performing arts groups
- School clubs, e.g., art, chess, foreign language, and math



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**Requirements for Afterschool Programs and Activities**

- Must always comply with CNS
  - Fee-based programs/activities
  - Exchange tickets for foods
- Never eligible for food exemptions




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### Classes and Educational Programs

**Examples**

- Culinary programs
- Family and consumer sciences classes
- Afterschool cooking programs



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### Requirements for Classes and Educational Programs

- Must always comply with CNS
  - Fee-based classes/programs
  - Exchange tickets for foods
- Never eligible for food exemptions
- If BOE voted to allow food exemptions, could sell noncompliant foods at events




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### Curriculum is Exempt

- CNS does not apply to foods that are part of curriculum



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### CSDE Resource

#### Requirements for Foods and Beverages in Culinary Programs in HFC Public Schools



[https://portal.ct.gov/-/media/sde/nutrition/hfc/culinary\\_programs\\_requirements\\_hfc.pdf](https://portal.ct.gov/-/media/sde/nutrition/hfc/culinary_programs_requirements_hfc.pdf)

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### Interschool Agreements

- Recipient public schools are eligible to participate in HFC if providing sponsor participates
  - Does not apply to interschool agreements with private schools or RCCIs



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### Recipient School Certifies for HFC on Their Interschool Agreement

- If indicates "will comply," CNS and HFC requirements apply
- Sales at events are eligible for exemptions




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### Summer School Programs Operated by BOE

- Enrichment programs \*
- Exploratory programs \*

\* Part of regular school day




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### Requirements for Summer School Programs Operated by BOE

- Must always comply with CNS
  - Fee-based programs
  - Exchange tickets for foods
- Never eligible for food exemptions



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### Adult Education Programs

#### State Laws

- No age limit for “students”
- Do not distinguish between regular and adult education programs



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### Food Sales Under Control of Adult Education Program

- **Yes:** CNS applies if program operates on school premises under BOE’s jurisdiction
- **No:** CNS does not apply if BOE rents, leases, or borrows building space

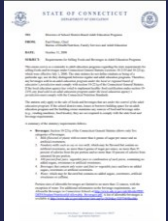


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### CSDE Resource

#### Requirements for Selling Foods and Beverages in Adult Education Programs (October 31, 2008)




<https://portal.ct.gov/-/media/sde/nutrition/hfc/adultedhfc.pdf>

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### CSDE Resource

#### Summary Chart: Federal and State Requirements for Competitive Foods in HFC Public Schools



[https://portal.ct.gov/-/media/sde/nutrition/compfoods/summary\\_chart\\_requirements\\_competitive\\_foods\\_hfc.pdf](https://portal.ct.gov/-/media/sde/nutrition/compfoods/summary_chart_requirements_competitive_foods_hfc.pdf)

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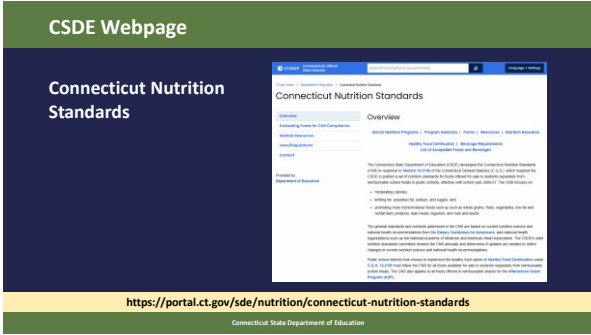
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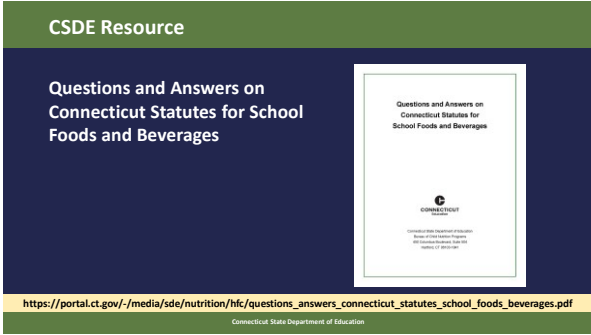
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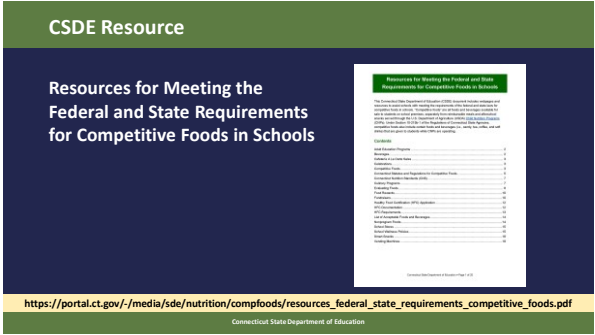
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Questions?



- Contact CSDE's HFC coordinator or school nutrition programs staff

<https://portal.ct.gov/sde/nutrition/healthy-food-certification/contact>  
<https://portal.ct.gov/-/media/sde/nutrition/cnstaff/countyassign.pdf>

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Knowledge Check

- Knowledge Check for Module 2: HFC Requirements
  - Test Your HFC IQ



<https://portal.ct.gov/sde/nutrition/healthy-food-certification/hfc-training-program>

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Thank you for participating!



<https://portal.ct.gov/sde/nutrition/healthy-food-certification/hfc-training-program>

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