# Guidance for Submitting Lists of Foods and Beverages for Healthy Food Certification Documentation 

## School Year 2023-24

This document provides important guidance for public school districts that are required to submit lists of foods and beverages to the Connecticut State Department of Education (CSDE) for the annual Healthy Food Certification (HFC) documentation. These districts are indicated in the CSDE's document, Districts Required to Submit Food and Beverage Lists for School Year 2023-24. Districts not indicated do not submit lists of foods and beverages and do not need to review the information below, but must still complete the online HFC Compliance Survey and should refer to the CSDE's Guidance for Completing the HFC Compliance Survey.

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All public school districts that implement Healthy Food Certification (HFC) under Section 10-215f of the Connecticut General Statutes (C.G.S.) must provide annual HFC compliance documentation to the CSDE by November 30 of each year. Successful compliance with HFC documentation ensures that HFC districts can maintain their HFC funding.

## Summary of HFC Documentation Requirements

All HFC districts must submit the online HFC Compliance Survey. For detailed instructions, refer to the CSDE's Guidance for Completing the HFC Compliance Survey. An overview of the HFC documentation requirements is available in the CSDE's 21 -minute training video, Completing the Documentation Requirements for HFC.

In addition, certain districts must submit lists of foods and beverages (refer to "What Foods and Beverages Must Be Included" in this document). These districts include three categories: 1) districts scheduled for an Administrative Review of the National School Lunch Program (NSLP) in the current school year; 2) districts implementing HFC for the first time this school year; and 3) districts with HFC compliance issues for the prior school year. These districts are indicated in the CSDE's document, Districts Required to Submit Food and Beverage Lists for School Year 2023-24.

## CSDE HFC Documentation Forms

After completing the online HFC Compliance Survey, districts must email their lists of foods and beverages to the CSDE (refer to "Submitting Food and Beverage Lists" in this document) using the appropriate documentation form for the current school year.

- Form 1: Commercial Foods and Beverages Sold in Cafeterias
- Form 2: Foods Made from Scratch Sold in Cafeterias
- Form 3: Foods and Beverages Sold in Vending Machines
- Form 4: Foods and Beverages Sold in School Stores, Kiosks, and Other School-based Enterprises
- Form 5: Food and Beverage Fundraisers
- Form 6: Commercial Foods and Beverages Sold from Other Sources
- Form 7: Foods Made from Scratch Sold from Other Sources

The HFC documentation forms are available in the "Documents/Forms" section of the CSDE's HFC webpage. These documents are form-fillable PDFs.

Download the current school year's forms. Make sure not to use forms from previous years.

## What Foods and Beverages Must Be Included

The district's lists must include the following foods and beverages available for sale to students from each source in all district schools and the district's interschool agreements with public schools that choose to participate in HFC:

- all foods available for sale to students separately from reimbursable meals served in the National School Lunch Program (NSLP) and School Breakfast Program (SBP);
- all foods served in the Afterschool Snack Program (ASP) of the NSLP; and
- all beverages available for sale to students as part of and separately from reimbursable meals and ASP snacks.

The district's lists must include all sources of these foods and beverages, such as cafeteria sales, vending machines, school stores, kiosks, concession stands, other school-based enterprises, fundraisers, and any other sources of food and beverage sales to students, e.g., culinary arts programs, family and consumer sciences classes, afterschool programs, and recipient schools under interschool agreements. This includes all commercial food and beverage products and foods made from scratch.

## How Many Lists Are Required

Submit one list for each source of foods and beverages available for sale to students. Do not submit a separate list of items for each individual school.

The number of lists that the district must submit depends on how many sources of food and beverage sales operate in the district. For example, a district that sells commercial foods and beverages from school cafeterias, vending machines, and school stores will submit three separate lists (one for each source).

Each list must represent all foods and beverages sold from that source in all district schools. For example, if the district has six cafeterias and an interschool agreement with a public school that has one cafeteria, submit one list that includes all foods and beverages sold in all seven cafeterias. If the district operates a total of five vending machines in the middle and high schools, submit one list that includes all foods and beverages sold from all five vending machines.

## Where to List Commercial Foods and Beverages

Depending on where they are sold, commercial foods and beverages are listed on form 1 (cafeteria), form 3 (vending machines), form 4 (school stores), and form 6 (other sources). Commercial foods and beverages are any commercially prepared foods and beverages purchased from vendors or stores. Examples include ready-to-eat foods (e.g., ice cream, chips, crackers, cookies, and muffins), foods that are heated or baked after purchasing (e.g., canned soup, chicken nuggets, and bake-off frozen cookie dough), and beverages such as milk, juice, water, and soy milk.

## Where to List Foods Made from Scratch

Depending on where they are sold, foods made from scratch are listed on form 2 (cafeteria) or form 7 (other sources). Form 7 is also used for school stores that sell foods made from scratch.

Foods made from scratch include the two categories below.

- Category 1 - foods prepared from ingredients using a standardized recipe: Examples include entrees sold only a la carte (not as part of reimbursable meals) e.g., pizza, chef's salad, lasagna, and sandwiches; soups; cooked grains (such as rice or pasta) with added ingredients, e.g., salt, oil, margarine, or butter; cooked vegetables with added ingredients, e.g., salt and fat; salad with dressing; fruit smoothies; and baked goods such as muffins and cookies
- Category 2 - foods with ingredients added after purchasing: Examples include popping popcorn kernels in oil and adding salt; making muffins from a mix and adding butter and eggs; and adding sprinkles to commercial frozen cookie dough. Note: Frozen commercially prepared foods (such as frozen cookies and rolls baked on site) are not included in this category unless the selling entity adds additional ingredients to the product. Examples include adding sprinkles to a frozen sugar cookie or buttering a frozen bake-off roll.

All foods made from scratch available for sale to students separately from reimbursable meals must comply with the CNS. The district is responsible for maintaining the following documentation for each food made from scratch: 1) a standardized recipe that indicates the nutrition information per serving; and 2) the appropriate completed Connecticut Nutrition Standards (CNS) worksheet indicating that the standardized recipe's serving complies with the CNS (refer to the "CNS Worksheets" section of the CSDE's CNS webpage). For additional information, refer to the CSDE's Guidance on Evaluating Recipes for Compliance with the Connecticut Nutrition Standards.

Maintain this documentation on file at the district for all foods made from scratch. The CSDE will review a random sample of the foods listed on forms 2 and 7 and will notify the district when they must submit their standardized recipes and completed CNS worksheets.

## Where to List Entrees

The CNS entree definition includes three categories of main dish food items: 1) a combination food of meat/meat alternate and whole grain-rich (WGR) food, e.g., breakfast egg sandwich on a whole-wheat English muffin, turkey wrap on whole-wheat tortilla, pizza with WGR crust, hamburger on a wholegrain bun and bean burrito with whole corn tortilla; 2) a combination food of vegetable/fruit and meat/meat alternate, e.g., chef's salad, fruit and cheese platter, yogurt and fruit parfaits, yogurt and fruit smoothies, baked potato with chili, and chicken vegetable stir-fry; and 3) a meat/meat alternate alone (e.g., sausage patty, egg and grilled chicken). This excludes yogurt, low-fat or reduced fat cheese, nuts, seeds, nut/seed butters and meat snacks, e.g., jerky and meat sticks, which must comply with the CNS snacks category.

## Entrees sold in school cafeterias

Entrees sold in school cafeterias are included on the district's lists if they are only sold a la carte (not part of reimbursable meals). These entrees are listed on the CSDE's applicable HFC documentation form (refer to "CSDE HFC Documentation Forms" in this document). For example, commercial a la carte entrees that are available for sale in school cafeterias are listed on Form 1: Commercial Foods and Beverages Sold in Cafeterias. A la carte entrees made from scratch that are available for sale in school cafeterias are listed on Form 2: Foods Made from Scratch Sold in Cafeterias.

Entrees sold in the cafeteria are not included on the district's lists if they are sold a la carte during the meal service on the same day that they are planned and served as part of reimbursable meals. These entrees are exempt from the CNS if they 1) are the same or smaller portion size as the NSLP and SBP; 2) have the same accompaniments (e.g., condiments); 3) meet the trans fat standard; and 4) do not contain nonnutritive sweeteners, sugar alcohols, or chemically altered fat substitutes.

## Entrees sold outside of the school nutrition programs

Entrees sold outside of the school nutrition programs (such as culinary programs or fundraisers) are not exempt from the CNS and must be included on the CSDE's applicable HFC documentation form (refer to "CSDE HFC Documentation Forms" in this document). For example, entrees made from scratch that are available for sale from culinary programs are listed on Form 7: Foods Made from Scratch Sold from Other Sources. Commercial entrees that are available for sale from other sources like afterschool programs are listed on Form 6: Commercial Foods and Beverages Sold from Other Sources.

## Where to List Fundraisers

Form 5 describes the process used to ensure that food and beverage fundraisers in all schools comply with the state and federal requirements. District only list fundraisers on this form if certain conditions apply.

- Submit form $\mathbf{5}$ only if the board of education or school governing authority (BOE) did not vote to allow food and beverage exemptions, or the BOE voted to allow food and beverage exemptions, but fundraisers do not meet the exemption criteria of the state HFC and beverage statutes (refer to "Food and beverage exemptions" below).
- Do not submit form 5 if the following apply: 1) the BOE voted to allow food and beverage exemptions; 2) fundraisers sell foods and beverages only at exempted events that occur after the school day or on weekends; 3) food fundraisers occur during the school day but the foods comply with the CNS and the sales comply with the state competitive foods regulations, and Section 10-221p of the Connecticut General Statutes (C.G.S.); and 4) beverage fundraisers occur during the school day but the beverages comply with the state beverage statute (C.G.S. Section 10-221q) and the U.S. Department of Agriculture's (USDA) Smart Snacks nutrition standards (refer to the CSDE's resource, Allowable Beverages for Connecticut Public Schools), and the sales comply with the state competitive foods regulations.


## Definition of fundraisers

Fundraisers are any activities conducted by any school-related or outside organization or group on school premises, during which money or its equivalent (e.g., coupons, tickets, tokens, and similar items) is exchanged for the purchase of a product in support of the school or school-related activities. This includes any activities that suggest a student donation in exchange for foods and beverages, since funds may be raised as a result. Examples of fundraisers include sales of commercial products (e.g., potato chips and other snack foods, candy bars, cookies, muffins, frozen cookie dough, pies, water, and soft drinks) and sales of foods and beverages made from scratch (e.g., baked goods, popcorn, sandwiches, smoothies, coffee, and hot chocolate).

## Food and beverage exemptions

Fundraisers on school premises cannot sell foods that do not comply with the CNS and beverages that do not comply with the state beverage statute unless the BOE has voted to allow exemptions and the fundraiser meets the following exemption criteria of the state HFC and beverage statutes: 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 the location of the event; and 3) the foods and beverages are not sold from a vending machine or school store.

- An "event" is an occurrence that involves more than just a regularly scheduled practice, meeting, or extracurricular activity. Events involve a gathering of people in a social context, such as sports competitions, awards banquets, school concerts, and theatrical productions. For
example, soccer games, school plays, and school debates are events, but soccer practices, play rehearsals, and debate team meetings are not.
- "Location" means where the event is being held. For example, cupcakes and lemonade may be sold to students on the side of the soccer field during a soccer game but cannot be sold to students in the school cafeteria while a soccer game is played on the soccer field.
- The "school day" is the period from the midnight before to 30 minutes after the end of the official school day. For example, if school ends at 3:00 p.m., the school day is from midnight to 3:30 p.m. A summer school program operated by the BOE is part of the regular school day.

For information on allowable fundraisers, refer to the CSDE's Requirements for Food and Beverage Fundraisers in HFC Public Schools.

## Options for Listing Commercial Foods and Beverages

Complete the appropriate CSDE HFC Documentation Form for each applicable source of food and beverage sales in the district, e.g., cafeteria, vending machines, school stores, fundraisers, and other sources (refer to "Where to List Commercial Foods And Beverages," "Where to List Foods Made from Scratch," "Where to List Entrees," and "Where to List Fundraisers" in this document). Districts may use either option below for listing commercial foods and beverages on forms 1, 3, 4, and 6 .

Forms 2 and 7 are only used for foods made from scratch. Form 5 is only used when the BOE did not vote to allow food and beverage exemptions, or the fundraisers do not meet the exemption criteria of the state HFC and beverage statutes

## Option 1: Highlight the List of Acceptable Food and Beverages (preferred method)

This is the preferred documentation method because it saves time, ensures that accurate information is provided for each product, and increases the likelihood that the district will be successful in complying with the HFC documentation requirements.

Highlight all items available for sale to students in the applicable pages of the CSDE's List of Acceptable Food and Beverages and attach the highlighted list to the first page of the appropriate HFC documentation form (refer to "CSDE HFC Documentation Forms" in this document). For example, attach the highlighted list of all items sold in cafeterias to the first page of Form 1: Commercial Foods and Beverages Sold in School Cafeterias. This option may be completed manually by printing the lists or electronically on the PDFs.

- Manual: Print the applicable pages of the CSDE's List of Acceptable Food and Beverages and highlight all foods and beverages available for sale to students. Complete and print the first page of the appropriate CSDE documentation form. Scan the first page of the documentation form and all highlighted pages together into one PDF document.
- Electronic: Highlight all foods and beverages electronically on the applicable pages of the PDF version of the CSDE's List of Acceptable Food and Beverages. Complete the first page of the PDF version of the appropriate CSDE documentation form. Combine the two PDF files (first page of the documentation form and all highlighted pages) together into one PDF document.

If the district sells any items that are not on the CSDE's List of Acceptable Food and Beverages, they must be added to the appropriate HFC documentation form (refer to option 2).

## Option 2: Enter information manually on the CSDE forms

Use the appropriate HFC documentation form to list all commercial foods and beverages, following the guidance below (refer to "CSDE HFC Documentation Forms" in this document).

- Include complete information for each product, including the manufacturer's name, food or beverage item, variety/flavor, and correct package size. Missing information requires additional submissions from the district and delays the CSDE's documentation review process.
- Include all flavors/varieties of each item sold and list each flavor/variety on a separate line. Do not list items as "assorted flavors" or "assorted variety."
- Do not submit vendor lists of foods and beverages. These lists do not usually contain all the required information. They also frequently use abbreviations that make it difficult to tell whether the items are the same as those listed on the CSDE's List of Acceptable Foods and Beverages webpage.
- Do not use abbreviations except for commonly understood measurements, e.g., oz. (ounces), fl. oz. (fluid ounces), c. (cup) and Tbsp. (tablespoon).

This method must be used when the district sells any foods and beverages that are not listed on the CSDE's List of Acceptable Food and Beverages.

## Submitting Lists of Foods and Beverages

1. Name the files in the format indicated below. Save one separate file for each source of foods and beverages, such as cafeterias, vending machines, and school stores.

- Commercial foods (forms 1, 3, 4, and 6): [District name] HFC List [insert source, e.g., cafeterias, vending, school store, etc.]. For example, "ABC District HFC List Cafeterias" and "ABC District HFC List Vending."
- Foods made from scratch (forms 2 and 7): [insert name of district] HFC List Cafeteria Scratch Foods. For example, "ABC District HFC List Cafeteria Scratch Foods" and "ABC District HFC List Other Scratch Foods."
- Fundraisers (form 5): [District name] HFC List Fundraisers. For example, "ABC District HFC List Fundraisers."

2. In the email subject line, indicate "[District name] HFC Lists." For example, "ABC District HFC Lists."
3. Email all files to susan.fiore@ct.gov by November 30, 2023. Do not mail the lists.

## Questions

For questions regarding the HFC documentation requirements, contact Susan Fiore, HFC Coordinator, at susan.fiore@ct.gov.

## Resources

Allowable Beverages in Connecticut Public Schools (CSDE):
https://portal.ct.gov/-/media/SDE/Nutrition/CompFoods/
Allowable_Beverages_Public_Schools.pdf
Beverage Requirements (CSDE webpage):
https://portal.ct.gov/SDE/Nutrition/Beverage-Requirements
Completing the Documentation Requirements for HFC (CSDE training module):
https://sdect.co1.qualtrics.com/jfe/form/SV_cXP8pmPkASBsqpM
Completing the Documentation Requirements for HFC (CSDE training module handout):
https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Doc/
Completing_Documentation_Requirements_HFC_Handout.pdf
Completing the Online Healthy Food Certification Compliance Form (CSDE):
https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Doc/
Completing_Online_HFC_Compliance_Form.pdf
Districts Required to Submit Lists of Foods and Beverages for Healthy Food Certification Documentation (CDE): https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Doc/ Districts_Required_to_Submit_Lists_Foods_Beverages_HFC_Documentation.pdf.

Ensuring District Compliance with Healthy Food Certification (CSDE): https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Ensuring_District_Compliance_HFC.pdf

Evaluating Foods for CNS Compliance (CSDE webpage): https://portal.ct.gov/SDE/Nutrition/Connecticut-Nutrition-Standards/How-To

Guidance for Completing the Healthy Food Certification Compliance Survey (CSDE): https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Doc/ Guidance_Completing_HFC_Compliance_Survey.pdf
Guidance on Evaluating Recipes for Compliance with the Connecticut Nutrition Standards: https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Evaluating_Recipes_CNS_Compliance.pdf
Healthy Food Certification Compliance Survey for School Year 2023-24: https://sdect.co1.qualtrics.com/jfe/form/SV_2f6IXLvFMsEYePA

Healthy Food Certification Documentation Forms (CSDE webpage):
https://portal.ct.gov/SDE/Nutrition/Healthy-Food-Certification/Documents
Overview of Connecticut Competitive Foods Regulations (CSDE): https://portal.ct.gov/-/media/SDE/Nutrition/CompFoods/
Overview_CT_Competitive_Foods_Regulations.pdf
Preview of the Healthy Food Certification Compliance Survey (CSDE):
https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Doc/
Preview_HFC_Compliance_Survey.pdf

Questions and Answers on Connecticut Statutes for School Foods and Beverages (CSDE): https://portal.ct.gov/-/media/SDE/Nutrition/HFC/
Questions_Answers_Connecticut_Statutes_School_Foods_Beverages.pdf
Responsibilities of District Contact Person for HFC (CSDE):
https://portal.ct.gov/-/media/SDE/Nutrition/HFC/HFC_District_Contact_Responsibilities.pdf
Requirements for Food and Beverage Fundraisers in HFC Public Schools (CSDE):
https://portal.ct.gov/-/media/SDE/Nutrition/HFC/Fundraiser_Requirements_HFC.pdf
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

Summary of Connecticut Nutrition Standards (CSDE):
https://portal.ct.gov/-/media/SDE/Nutrition/HFC/CNS/
Connecticut_Nutrition_Standards_Summary.pdf


For more information on HFC documentation, visit the "Documents/Forms" section of the CSDE's Healthy Food Certification webpages, or contact the HFC coordinator in the CSDE's Bureau of Child Nutrition Programs, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

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

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