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

This document summarizes how to evaluate commercial food products for compliance with the Connecticut Nutrition Standards (CNS). Public school districts that choose the healthy food option of Healthy Food Certification (HFC) under Section 10-215f of the Connecticut General Statutes must ensure that all foods available for sale to students on school premises separately from reimbursable meals meet the CNS. Examples of sources that sell foods to students include the school cafeteria, fundraisers, school stores, vending machines, concession stands, and any other groups, programs, or activities that sell foods to students. The CNS also applies to all foods served in the Afterschool Snack Program (ASP).

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List of Acceptable Foods and Beverages

The Connecticut State Department of Education's (CSDE) List of Acceptable Foods and Beverages webpage includes brand-specific lists of commercially prepared food products that comply with the CNS and beverages that comply with the beverage requirements of Section 10-221q of the Connecticut General Statutes and the U.S. Department of Agriculture's (USDA) Smart Snacks nutrition standards. HFC schools must use this list to determine which commercial foods and beverages may be sold to students.

Reviewing Products

Before purchasing a commercial product that will be sold to students, the selling entity must verify that the product is included on the CSDE's List of Acceptable Foods and Beverages webpage. CSDE approval of commercial products is specific to the brand and variety of each food or beverage. The commercial product must match the specific information on the CSDE's List of Acceptable Foods and Beverages webpage for the manufacturer name, product name, product description (e.g., variety/flavor), serving size, case pack, UPC or product code, and nutrition information per serving.

> If a commercial food product is not included on the CSDE's List of Acceptable Foods and Beverages webpage, the selling entity must use the CSDE's appropriate CNS worksheet to determine that the product complies with the CNS before the food is purchased. For more information, refer to "CNS Worksheets" in this document.

Submitting Products

If a commercial product is not included on the CSDE's List of Acceptable Foods and Beverages webpage, submit the product information to the CSDE for review. The CSDE's resource, *Submitting Food and Beverage Products for Approval*, summarizes the procedure and required information to submit commercial products to the CSDE for approval.

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Reviewing Products Served with Accompaniments

The CNS applies to the amount of the food as served, including any accompaniments served with the food, such as butter, cream cheese, salad dressing, and condiments. Some examples of foods with accompaniments include bagels with cream cheese, muffins with butter, french fries with ketchup, pancakes with syrup, tortilla chips with salsa, and chicken nuggets with dipping sauce.

The approval of commercial products on the CSDE's List of Acceptable Foods and Beverages webpage applies only to the food as purchased, without any accompaniments. Adding accompaniments changes the commercial product's nutrition information. When foods are served with accompaniments, the nutrition information for the commercial product and its accompaniments must be added together to determine if the product still complies with the CNS. The serving of the commercial product with its accompaniments must meet each nutrition standard for the applicable CNS food category (refer to the CSDE's resource, *Summary of Connecticut Nutrition Standards*).

It is important to note that many accompaniments are high in fat, sugar, and sodium, and cause approved products to exceed the CNS limits. Tables 1 and 2 show an example for cream cheese served with a whole grain-rich (WGR) bagel from the CSDE's List of Acceptable Foods and Beverages webpage. This cream cheese cannot be served with the bagel because it causes the bagel to exceed the CNS limits for sodium and saturated fat. The selling entity could use the CNS worksheet for the appropriate food category to determine if a smaller portion or different type of cream cheese (such as reduced fat) might meet the CNS (refer to "CNS Worksheets" in this document).

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Table 1. Nutrition information for a WGR bagel with cream cheese

Nutrition Information	WGR bagel, 1.8 oz	Cream cheese, ½ ounce	Total	CNS requirement	Complies with CNS
Calories	140	50	**190**	≤ 200 calories	Yes
Fat (grams [g])	0.5	5	**5.5**	NA	NA *
Saturated fat (g)	0	3	**3**	NA	NA *
Sodium (milligrams [mg])	150	55	**205**	≤ 200 mg	**No**
Total sugars (g)	4	0	**4**	≤15 grams	Yes

* The CNS limits apply to the percentage of calories from total fat and saturated fat, not the grams of total fat and saturated fat (refer to table 2 below).

Table 2. Percentage of calories from fat and saturated fat and percentage of sugars by weight for a WGR bagel with cream cheese

Nutrition Information for WGR bagel with cream cheese	Total	CNS requirement	Complies with CNS
Percentage of calories from fat	**26%**	≤ 35%	Yes
Percentage of calories from saturated fat	**14.2%**	< 10%	**No**
Percentage of sugars by weight	**6.2%**	≤ 35%	Yes

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CNS Worksheets

The CSDE's CNS worksheets determine if foods comply with the CNS. Each worksheet evaluates a specific CNS food category.

- Worksheet 1: Snacks
- Worksheet 2: Yogurt and Pudding
- Worksheet 3: Smoothies
- Worksheet 4: Fruits and Vegetables
- Worksheet 5: Soups
- Worksheet 6: Cooked Grains
- Worksheet 7: Entrees
- Worksheet 8: Non-entree Combination Foods
- Worksheet 9: Nutrient Analysis of Recipes
- Worksheet 10: Evaluating Recipes for Sugars

These Excel worksheets must be used for commercial products served with accompaniments and may be used to screen commercial products for CNS compliance before purchasing. Enter the product's nutrition information per serving (including its accompaniments) into the appropriate CNS worksheet for the food category. The worksheet will automatically calculate whether the serving complies with the CNS.

Keep all completed worksheets on file for the CSDE's annual HFC documentation (due November 30 of each year) and the CSDE's Administrative Review of the school nutrition programs. The CSDE recommends maintaining completed worksheets electronically in a computer folder.

The CNS worksheets and additional guidance on evaluating foods and beverages are available under "CNS Worksheets" in the "Evaluating Foods for CNS Compliance" section of the CSDE's CNS webpage. Training on how to determine if commercial foods comply with the CNS is available in Module 4: Evaluating Foods for CNS Compliance of the CSDE's *Complying with Healthy Food Certification* training program.

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Strategies to Ensure Compliance

To receive HFC funding, all district schools must comply with the CNS and HFC requirements. Districts are responsible for developing and implementing procedures to ensure that all competitive foods on school premises comply with these requirements.

The most common noncompliance issues for commercial products include 1) not verifying that the food or beverage is included on the CSDE's List of Acceptable Foods and Beverages webpage; and 2) not checking deliveries to ensure that vendors do not substitute noncompliant products. To prevent these noncompliance issues, the district's procedures for commercial competitive foods must include the strategies below.

1. **Clearly communicate what foods and beverages are allowed:** Notify all entities that sell foods and beverages to students on school premises what commercial products are allowed, based on the CSDE's List of Acceptable Foods and Beverages webpage, and specify that substitutions are not allowed. Examples of people to inform include food service directors and cafeteria staff, culinary programs staff, school store operators, vending machine operators, fundraiser operators, coordinators of school clubs and organizations, and staff from outside entities such as food service management companies and vendors. Provide clear instructions to vendors about allowable foods and beverages and indicate that substitutions are not allowed when an approved product is not available.

2. **Evaluate all commercial products before purchasing:** Before purchasing any commercial products, determine that foods comply with the CNS and beverages comply with the state beverage statute and Smart Snacks. Use the CSDE's List of Acceptable Foods and Beverages webpage to verify that the food or beverage is listed. Check that the product's information exactly matches the CSDE-approved product, including the manufacturer name, product name, product description (e.g., variety/flavor), serving size, case pack, product code, and nutrition information. If the food includes accompaniments (such as butter, cream cheese, salad dressing, and condiments), add the nutrition information for the food and its accompaniments together to determine if the product still complies with the CNS. Accompaniments that cause an approved product to exceed the CNS limits cannot be served with the product. Commercial products that are not on the CSDE's List of Acceptable Foods and Beverages webpage cannot be sold to students. Districts may submit products to the CSDE for review using the steps in the CSDE's resource, *Submitting Food and Beverage Products for Approval*.

3. **Verify vendor assurances of product compliance:** When a food manufacturer, vendor, distributor, or salesperson indicates that a product complies with the CNS or state beverage statute, verify that these products are included on the CSDE's List of Acceptable Foods and Beverages webpage. The CSDE does not review or approve vendor lists of compliant products or vendor statements about compliant products. A common vendor error is assuming that commercial products that meet the USDA's Smart Snacks nutrition standards also comply with the CNS. Many Smart Snacks products do not comply with the CNS because the CNS requirements are stricter (refer to the CSDE's resource, *Comparison of the Connecticut Nutrition Standards and the USDA's Smart Snacks Nutrition Standards*).

4. **Review orders before submitting to vendors:** For each source of competitive foods, designate the school staff responsible for reviewing orders to ensure that all foods and beverages are included on the CSDE's List of Acceptable Foods and Beverages webpage (refer to strategy 2). Examples include the food service manager who is responsible for reviewing the cafeteria snack orders and the district's fundraiser coordinator who is responsible for using the district's fundraiser approval form to review foods and beverages that will be sold from fundraisers (refer to strategy 7).

5. **Check deliveries when received:** Ordering products that are included on the CSDE's List of Acceptable Foods and Beverages webpage does not guarantee they will be delivered. For each source of competitive foods, designate the school staff responsible for checking deliveries to ensure that vendors do not substitute noncompliant products. Examples include a food service employee who checks deliveries of snack foods (such as cookies, chips, and ice cream) for the cafeteria and school staff who check vending machines when they are stocked by an outside vending company (refer to strategy 8).

6. **Identify the steps for handling noncompliant products:** Ensure that all applicable school staff follow the steps for handling deliveries of noncompliant foods and beverages. Refuse delivery of all noncompliant products and remind the vendor that substitutions are not allowed. Noncompliant products discovered after an order is delivered must be returned to the vendor.

7. **Develop and implement a fundraiser approval process:** Districts must implement a fundraiser approval process for reviewing fundraisers in advance to determine that they comply with one of the following allowable fundraiser procedures: a) the fundraiser sells compliant foods and beverages to students on school premises and does not occur while any CNPs are operating; b) the fundraiser meets the exemption criteria of the state HFC and beverage statutes and sells noncompliant foods and beverages to students at the location of an event held after the school day or on the weekend, that does not occur

while any CNPs are operating (refer to the CSDE's resource, *Exemptions for Foods and Beverages in Public Schools*); or c) students take orders for noncompliant foods and beverages off school premises and bring the orders and money to school, but do not pick up the foods and beverages on school premises for delivery to customers. The CSDE's *Sample Fundraiser Form for Healthy Food Certification* provides guidance on developing a district fundraiser approval form. For detailed guidance on the fundraiser requirements, refer to the CSDE's resource, *Requirements for Food and Beverage Fundraisers in HFC Public Schools*, and Module 6: Fundraisers of the CSDE's *Complying with Healthy Food Certification* training program. For guidance on the state restrictions that apply when CNPs are operating, refer to "State Competitive Foods Regulations" in this document.

8. **Monitor vending machines operated by an outside vendor:** Districts are responsible for ensuring that all vending machines sell only compliant foods and beverages, regardless of who owns or operates them. The state HFC and beverage statutes prohibit exemptions for vending machines. Districts must prevent substitutions of noncompliant products by: a) clearly communicating to the vending company what foods and beverages are allowed (refer to strategy 1); b) including language in the vending contract that substitutions are not allowed and that the vending company must train their employees who stock the vending machines on this requirement; c) designating school staff to monitor vending machines when they are stocked (refer to strategy 5); and d) refusing delivery of noncompliant products (refer to strategy 6). Vending machines stocked with noncompliant products must be turned off immediately and cannot operate until the vending company removes these products. For detailed guidance on the requirements for vending machines, refer to the CSDE's resource, *Requirements for Foods and Beverages in Vending Machines in HFC Public Schools*.

For additional guidance on meeting the federal and state nutrition standards for foods and beverages and other requirements for different sources of competitive foods, visit the "Guidance and Resources" section of the CSDE's HFC webpage.

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Resources

CNS Worksheets ("Evaluating Foods for CNS Compliance" section of CSDE's Connecticut Nutrition Standards webpage):
https://portal.ct.gov/sde/nutrition/connecticut-nutrition-standards/evaluating-foods-for-cns-compliance#CNSWorksheets

Complying with Healthy Food Certification (CSDE training program):
https://portal.ct.gov/sde/nutrition/healthy-food-certification/hfc-training-program

Connecticut Nutrition Standards (CSDE webpage):
https://portal.ct.gov/sde/nutrition/connecticut-nutrition-standards

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's Connecticut Nutrition Standards webpage):
https://portal.ct.gov/sde/nutrition/connecticut-nutrition-standards/evaluating-foods-for-cns-compliance

Exemptions for Foods and Beverages in Public Schools (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/hfc/food_beverage_exemptions_public_schools.pdf

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

Healthy Food Certification (CSDE webpage):
https://portal.ct.gov/sde/nutrition/healthy-food-certification

How to Evaluate Commercial Food Products for Compliance with the Connecticut Nutrition Standards (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/hfc/evaluate_commercial_food_products_cns.pdf

How to Evaluate Foods Made from Scratch for Compliance with the Connecticut Nutrition Standards (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/hfc/evaluate_scratch_foods_cns_compliance.pdf

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List of Acceptable Foods and Beverages (CSDE webpage):
https://portal.ct.gov/sde/nutrition/list-of-acceptable-foods-and-beverages

Requirements for Cafeteria A La Carte Foods and Beverages in HFC Public Schools (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/hfc/cafeteria_requirements_hfc.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

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

Sample Fundraiser Form for HFC (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/hfc/sample_fundraiser_form_hfc.pdf.

Submitting Food and Beverage Products for Approval (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/hfc/fblist/submitting_food_beverage_products.pdf

Summary Chart of 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

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For more information, visit the CSDE's Healthy Food Certification webpage and Connecticut Nutrition Standards webpage or contact the HFC Coordinator at the Connecticut State Department of Education, 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/evaluate_commercial_food_products_cns.pdf.

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