This document summarizes how to evaluate foods made from scratch 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 separately from reimbursable meals meet the Connecticut Nutrition Standards (CNS). The CNS also applies to all foods served in the Afterschool Snack Program (ASP).

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#### **Sources of Foods Made from Scratch**

Some examples of the sources on school premises that might sell foods made from scratch to students include school cafeterias (a la carte sales), bake sales, fundraisers, culinary arts programs, family and consumer sciences classes, and afterschool programs.

#### **Required CNS Documentation for Foods Made from Scratch**

Foods made from scratch cannot be sold to students on school premises unless the selling entity has documentation on file to indicate that the serving with its accompaniments complies with the CNS. The required CNS documentation includes the two items below.

- Standardized recipe: An accurate standardized recipe that indicates the calories, fat, saturated fat, sodium, and sugars per serving. For guidance on developing and using standardized recipes, visit the "Standardized Recipes" section of the CSDE's Crediting Documentation for the Child Nutrition Programs webpage.
- 2. **CNS worksheet:** The completed CNS worksheet for the applicable food category documenting that the serving with its accompaniments complies with the CNS (refer to "CNS Worksheets" in this document).

Accompaniments are foods that accompany another food or beverage, such as butter, cream cheese, syrup, ketchup, mustard, mayonnaise, and salad dressing. Foods must be evaluated for CNS compliance based on the serving including any added accompaniments (refer to "Reviewing Foods Served with Accompaniments" in this document).

Schools must maintain CNS documentation on file for the annual HFC documentation (due by November 30) and the CSDE's Administrative Review of the school nutrition programs.

### **Foods Requiring Standardized Recipes**

Standardized recipes that include nutrition information per serving are required for the two categories of foods made from scratch below.

- Category 1 foods prepared from ingredients using a standardized recipe:
   Examples include entrees sold only a la carte (i.e., not as part of reimbursable meals in the National School Lunch Program [NSLP] and School Breakfast Program [SBP]) such as pizza, chef's salad, lasagna, and sandwiches; soups; cooked grains (e.g., rice and pasta) with added salt and fat, e.g., oil, margarine, or butter; cooked vegetables with added salt and fat; salad with dressing; fruit smoothies; and baked goods, e.g., muffins and cookies.
- Category 2 commercial products 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.

Adding ingredients to a commercial product changes its nutrition information per serving. The selling entity must create a standardized recipe for these foods based on the specific amount of each ingredient, then conduct a nutrient analysis to determine the nutrition information per serving.

If the standardized recipe is missing nutrition information, the selling entity must conduct a nutrient analysis using a nutrient analysis software program, or a nutrient analysis database and the CSDE's CNS Worksheet 9: Nutrient Analysis of Recipes. To calculate nutrition information for sugars, use CNS Worksheet 10: Evaluating Recipes for Sugars. Schools must maintain documentation of CNS compliance for all foods made from scratch that are available for sale to students on school premises separately from reimbursable meals and served in the ASP.

The CSDE's *Guidance on Evaluating Recipes for Compliance with the Connecticut Nutrition Standards* summarizes the requirements and steps for conducting a nutrient analysis of standardized recipes. For guidance on evaluating standardized recipes, visit "Foods Made from Scratch" in the "Evaluating Foods for CNS Compliance" section of the CSDE's CNS webpage. Training is available in "Module 4: Evaluating Foods for CNS Compliance" of the CSDE's Complying with Healthy Food Certification training program.

#### **CNS Worksheets**

Before selling any foods made from scratch to students, schools must verify that the serving of the standardized recipe with each nutrition standard for the appropriate CNS food category. Schools must use the CSDE's CNS worksheets to determine if the nutrition information per serving complies with the CNS. Each worksheet evaluates a specific food category.

- Worksheet 1: Snacks
- Worksheet 2: Yogurt and Pudding (applies only to commercial products)
- 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 worksheets and additional guidance on evaluating foods and beverages are available in the "Evaluating Foods for CNS Compliance" section of the CSDE's CNS webpage.

Maintain this documentation on file for HFC documentation (due November 30 of each year) and the CSDE's Administrative Review of the school nutrition programs. For easy access, the CSDE recommends storing CNS compliance documentation electronically in a computer folder.

### **Reviewing Foods 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, french fries with ketchup, salad with dressing, stir-fry chicken with duck sauce, and hamburgers with ketchup.

Adding accompaniments to a food made from scratch changes its nutrition information per serving. When foods include accompaniments, the nutrition information for both items must be added together to determine if the food complies with the CNS. The serving of the food with its accompaniments must meet each nutrition standard for the applicable CNS food category (refer to the CSDE's Summary of Connecticut Nutrition Standards). The CSDE's Guidance on Evaluating Recipes for Compliance with the Connecticut Nutrition Standards includes the steps for conducting a nutrient analysis of foods served with accompaniments.

It is important to note that many accompaniments are high in fat, sugar, and sodium, and might cause compliant foods to exceed the CNS limits. For example, serving butter with a compliant whole grain-rich corn muffin might cause the muffin to exceed the CNS limit for calories and saturated fat.

The selling entity must use the CNS worksheet for the applicable food category to determine if the serving of the food with its accompaniments complies with the CNS (refer to "CNS Worksheets" in this document). If the serving exceeds the CNS limits, the selling entity could also use these worksheets to determine if serving a smaller portion or different type of accompaniment might meet the CNS.



### **Strategies to Ensure Compliance**

To receive HFC funding, all district schools must comply with the CNS and HFC requirements. Foods made from scratch that do not comply with the CNS cannot be sold to students on school premises unless the BOE has voted to allow exemptions and the sales meet the exemption criteria of the state HFC statute (refer to the CSDE's *Exemptions for Foods and Beverages in Public Schools*).

Districts are responsible for developing and implementing procedures to ensure that all foods made from scratch comply with the CNS. The most common noncompliance issues for foods made from scratch include: 1) not having accurate standardized recipes that provide all required nutrition information; and 2) not using the appropriate CNS worksheet to document that the serving with its accompaniments complies with the CNS. To prevent these noncompliance issues, the district's procedures for sales of competitive foods must require prior approval for foods made from scratch that will be sold to students separately from reimbursable meals and as part of ASP snacks. These procedures must address the requirements below.

- 1. Evaluate all foods made from scratch before selling to students: The district's procedures for sales of competitive foods must require prior approval for all foods made from scratch (refer to "Foods that Require Standardized Recipes" in this document). Foods made from scratch cannot be sold to students unless the selling entity has the following documentation: 1) an accurate standardized recipe that indicates the calories, fat, saturated fat, trans fat, sodium, and sugars per serving; and 2) the completed CNS worksheet for the applicable food category documenting that the standardized recipe's serving with its accompaniments complies with the CNS (refer to "CNS Worksheets" in the "Evaluating Foods for CNS Compliance" section of the CSDE's CNS webpage). For easy access, the CSDE recommends storing this information electronically in a computer folder.
- 2. Obtain information for missing nutrient values: Complete nutrition information is required to determine if the standardized recipe's serving complies with the CNS. Check each standardized recipe to ensure that the nutrition information per serving includes calories, fat, saturated fat, trans fat, sodium, and sugars. A missing nutrient value does not mean that the standardized recipe does not contain that nutrient. For example, a software program might use an asterisk (\*) or "NA" (not available) to indicate a nutrient value is missing, but the standardized recipe might still contain that nutrient. Standardized recipes with missing nutrient values cannot be used to make competitive foods that will be sold to students. A nutrient analysis is required to determine any missing nutrient values (refer to the CSDE's Guidance on Evaluating Recipes for Compliance with the Connecticut Nutrition Standards).

- 3. Include all accompaniments in the nutrient analysis: A common error when determining if the serving of a standardized recipe complies with the CNS is not including the food's accompaniments in the nutrient analysis. The nutrition information for the food and its accompaniments must be added together to determine if the serving complies with the CNS (refer to "Reviewing Foods Served with Accompaniments" in this document).
- 4. Conduct a nutrient analysis for foods with ingredients added after purchasing: Adding ingredients to a purchased product changes its nutrition information and requires a nutrient analysis to determine if the serving complies with the CNS (refer to "Category 2: foods with ingredients added after purchasing" in this document). For example, if sprinkles are added to commercial frozen sugar cookies before baking, a nutrient analysis is required to determine if the combined nutrition information for the sugar cookie and sprinkles meets the CNS. The selling entity must create a standardized recipe based on the specific amount of each ingredient, then conduct a nutrient analysis to determine the nutrition information per serving.

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.

#### Resources

Complying with Healthy Food Certification Module 4: Evaluating Foods for CNS Compliance (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 HFC (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 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\_commerical\_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

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 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 Healthy Food Certification (CSDE): https://portal.ct.gov/-/media/sde/nutrition/hfc/sample\_fundraiser\_form\_hfc.docx

Standardized Recipe Form for School Nutrition Programs (CSDE): https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/standardized\_recipe\_form\_schools.docx

Standardized Recipes (CSDE's Crediting Documentation for the Child Nutrition Programs webpage):

https://portal.ct.gov/sde/nutrition/crediting-documentation-for-the-child-nutrition-programs/standardized-recipes

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

Weights and Measures (CSDE's Crediting Foods in School Nutrition Programs webpage): https://portal.ct.gov/sde/nutrition/crediting-foods-in-school-nutritionprograms#WeightsMeasures

For more information, visit the CSDE's Healthy Food Certification and Connecticut Nutrition Standards webpages, 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 <a href="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</a>.

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