

Guidance for Documenting Compliance with Healthy Food Certification

Districts participating in healthy food certification (HFC) under Section 10-215f of the Connecticut General Statutes must provide annual documentation to the Connecticut State Department of Education (CSDE) to indicate that all foods sold to students separately from reimbursable meals served in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) meet the Connecticut Nutrition Standards, and all beverages sold to students meet the requirements of Section 10-221q of Connecticut General Statutes. This applies to all foods and beverages sold to students in all schools in the district from all sources including 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 and recipient schools under interschool agreements.

REQUIRED HFC DOCUMENTATION

All HFC districts must submit the *Healthy Food Certification Compliance Form* to the CSDE by November 30 of each year. Lists of foods and beverages sold to students from all sources are also required if the district meets any of the following criteria:

- scheduled for a state review of the NSLP in the current school year;
- did not implement HFC in the prior school year; or
- had significant compliance issues during the HFC review in the prior school year.

Districts that meet the above criteria are listed in *Districts Required to Submit Food and Beverage Lists at X*. The CSDE has developed seven forms that these districts may use to submit lists of foods and beverages. These forms assist in providing the CSDE with the necessary documentation to indicate the district's compliance with the state statutes. Successful compliance ensures that districts can maintain their state funding for HFC. The forms include:

- Form 1 – Purchased Foods and Beverages Sold in Cafeteria
- Form 2 – School-Made Foods Sold in Cafeteria
- Form 3 – Foods and Beverages Sold in Vending Machines
- Form 4 – Foods and Beverages Sold in School Stores, Kiosks or Other School-Based Enterprises
- Form 5 – Food and Beverage Fundraisers
- Form 6 – Purchased Foods and Beverages Sold from Other Sources
- Form 7 – School-Made Foods Sold from Other Sources

Districts may choose to modify the CSDE forms or use locally developed forms instead, as long as all required information is provided. The *Healthy Food Certification Compliance Form* and forms 1-7 are available as both PDF and “tab and type” documents on the CSDE Web site (Healthy Food Certification Documentation page) at <http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=322428>. These documents should be completed by the district's designated contact person for HFC in consultation with all appropriate school staff members such as the school food service director, cafeteria managers, culinary arts teachers, family and consumer sciences teachers, athletic directors, parent groups and individuals who coordinate fundraising activities, school stores, kiosks, other school-based enterprises, vending machines and any other food or beverage sales to students.

PURCHASED FOODS AND BEVERAGES

For districts required to submit lists of foods and beverages, the lists must include all items sold in the entire district. It is not necessary to submit a separate list of items for each individual school. The CSDE strongly recommends that districts simplify the documentation process by printing the appropriate pages of the CSDE's *List of Acceptable Foods and Beverages* and highlighting all items sold in the district (see “Simplify HFC Documentation” above). If the district chooses to manually list items on the CSDE forms, following the guidance below will help provide accurate information.

- Include complete information for each product, including manufacturer, food or beverage item, variety/flavor and correct package size. Missing information delays the CSDE 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 generally do not contain all required information. They also frequently use abbreviations that make it difficult to tell whether the items are the same as those on the CSDE approved list.
- Do not use abbreviations.

Simplify HFC Documentation

The CSDE strongly encourages districts to simplify the HFC documentation process by printing the appropriate sections of the CSDE's *List of Acceptable Foods and Beverages*, highlighting all items sold to students in each area (e.g., cafeteria, vending machines and school stores), and attaching to the appropriate CSDE form. For example, the highlighted CSDE list of items sold in cafeterias is attached to *Form 1 – Purchased Food and Beverages Sold in Cafeteria*.

The CSDE recommends this method of documentation because it:

- saves time since schools do not need to write or type lists of foods and beverages;
- ensures that complete and accurate information is provided to the CSDE for each product; and
- increases the likelihood of the district's successful compliance with HFC requirements.

USING THE CSDE FORMS (*Applies only to those districts required to submit lists of foods and beverages*)

- **Cafeteria Sales of Purchased Foods and Beverages:** Districts must identify all food and beverages sold to students separately from reimbursable meals in all cafeterias. This information may be submitted using *Form 1 – Purchased Food and Beverages Sold in Cafeteria* or an equivalent district-developed form that includes all required information (manufacturer, food or beverage item, variety/ flavor and package size).*
- **Cafeteria Sales of School-Made Foods:** Districts must identify all school-made foods sold separately from reimbursable meals in all cafeterias, except for entree items that are sold as part of reimbursable meals and are also sold a la carte on the same day. This information may be submitted using *Form 2 – School-Made Foods Sold in Cafeteria* or an equivalent district-developed form that includes all required information (food item, recipe used, portion size and how the recipe was verified for compliance with the Connecticut Nutrition Standards). For more information, see “School-Made Foods” at right.
- **Vending Machines:** Districts must identify all foods and beverages sold in vending machines accessible to students. This information may be submitted using *Form 3 – Foods and Beverages Sold in Vending Machines* or an equivalent district-developed form that includes all required information (manufacturer, food or beverage item, variety/ flavor and package size).*
- **School Stores, Kiosks and Other School-Based Enterprises:** Districts must identify all foods and beverages sold in school stores, kiosks or other school-based enterprises. This information may be submitted using *Form 4 – Foods and Beverages Sold in School Stores, Kiosks or Other School-Based Enterprises* or an equivalent district-developed form that includes all required information (manufacturer, food or beverage item, variety/ flavor and package size).*
- **Fundraisers:** Districts must describe the process used to ensure that all food and beverage fundraisers in all schools meet the requirements of state statutes. This information may be submitted using *Form 5 – Food and Beverage Fundraisers* or an equivalent district-developed form that includes all required information. This form is required only for food and beverage fundraisers that have **not** been exempted by the board of education. *If food and beverage fundraisers are only sold to students at exempted events occurring after the school day or on weekends, the district does not need to complete this form.* For more information, see *Fundraising with Foods and Beverages* at <http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=322426>.
- **Food and Beverage Sales from Other Sources:** Districts must identify all foods and beverages sold from any other sources not indicated above, e.g., culinary programs, family and consumer sciences classes, recipient schools under interschool agreements, summer school programs (e.g., enrichment or exploratory) operated by board of education, adult education programs operated by the board of education, family resource centers, a la carte foods sold in Seamless Summer Food Programs and Summer Food Service Programs operated by the board of education, and foods served in the USDA Afterschool Snack Program. For purchased items, districts can use *Form 6 – Purchased Foods and Beverages Sold from Other Sources* or an equivalent district-developed form that includes all required information (manufacturer, food or beverage item, variety/ flavor and package size).* For foods made from scratch, districts may use *Form 7 – School-Made Foods Sold from Other Sources* or an equivalent district-developed form that includes all required information (food item, recipe used, portion size and how the recipe was verified for compliance with the Connecticut Nutrition Standards). For more information, see “School-Made Foods” at right.

* Instead of completing the forms manually, the CSDE strongly recommends printing the appropriate pages of the CSDE’s *List of Acceptable Foods and Beverages* and highlighting all items sold in the district (see “Simplify HFC Documentation” on page 1).

School-Made Foods

The district is responsible for conducting a nutrient analysis of all school-made foods to ensure that they comply with the Connecticut Nutrition Standards. This includes all items that are 1) prepared from scratch using a recipe, e.g., entrees, soup, baked goods, cooked grains and vegetables; or 2) require some additional processing by adding other ingredients after purchasing, e.g., popping popcorn kernels with added oil or making cookies from a mix and adding butter and eggs.

This applies to the cafeteria as well as any other sources of school-made foods sold to students separately from reimbursable meals, e.g., fundraisers, culinary programs and family and consumer sciences classes.

Additional information on evaluating recipes is contained in *Guidance on Evaluating School Recipes for Compliance with the Connecticut Nutrition Standards* and the CSDE’s worksheets, *Evaluating Recipes for Trans Fat* and *Evaluating Recipes for Added Sugars*, available under “School-Made Foods” at <http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=322430>.



Additional guidance on the HFC documentation requirements can be found on the CSDE’s Web site at <http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=322418>. For more information, contact Susan S. Fiore, M.S., R.D., Nutrition Education Coordinator, Connecticut State Department of Education, Bureau of Health/Nutrition, Family Services and Adult Education, 25 Industrial Park Road, Middletown, CT 06457, 860-807-2075, susan.fiore@ct.gov.

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