Are Your Snacks "Smart" Enough?

Professional Standards Learning Code: 1110

KSNA June 17th-19th

Olivia Thomas, RD, LD; Dietetics Educator

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Healthy Hunger-Free Kids Act

- Requires that USDA establish nutrition standards for all foods and beverages sold in school.
- Applies to all foods sold:
  - Outside the school meal programs;
    - A la carte in the cafeteria
    - In school stores
    - Snack bars
    - Vending machines
    - Other venues
  - On the school campus; and
  - At any time during the school day

School Campus

All areas of the property under the jurisdiction of the school that are accessible to students during the school day.

School Day

WINDOW 1

First window is from midnight the night before until 30 minutes after the last lunch period. While this window is open, no sale of food or beverage may take place except as part of the school breakfast or school lunch program. (ala carte)

WINDOW 2

Second window opens 30 minutes after the last lunch period ends and closes 30 minutes after the end of the official school day. While this window is open any food that is sold must meet all nutrition standards in the regulations.

WINDOW 3

Third window opens 30 minutes after the end of the official school day and closes at midnight. During this window, there are no nutrient standards restricting what may be sold.

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Fundraisers

Fundraiser Exemptions

There will be no exemptions given for fundraisers. No foods or beverages may be sold on the school campus during the school day that do not meet the new standards.

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Fundraisers

- All foods that meet the regulatory standards may be sold on the school campus from 30 minutes after lunch until 30 minutes after the school day.

- The standards would not apply to items sold during non-school hours, weekends, or off-campus fundraising events.

Common Fundraising Questions:

If we are selling precooked, bulk items for consumers to eat at home, do they still have to meet the standards?

No. The sale of frozen pizza, cookie dough and other items preordered and distributed in a precooked state or in bulk items (multiple servings in a package) for consumption at home is not required to meet the standards.

Can we take fundraising orders at school?

Yes. Orders may be taken at school *if* they meet the standards **OR** are not intended to be consumed on school campus during school hours.

Can the delivery of fundraiser items happen during school hours?

Yes. Foods that have been purchased through a fundraiser may be delivered to the school campus during the day if the foods being sold meet the standards or if they are not intended to be consumed on campus during school hours and as long as the student has permission from the school. It is encouraged to deliver when parents are more likely to collect items, for example, during specific drop off or pick up times.

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General Standards for Foods

Standards for Foods

- Apply to all grade levels
- Include general and specific nutrient standards
- Provide exemptions to nutrient standards for specific foods
- Allow broader exemptions for fruits and vegetables and some NSLP/SBP foods

General Standards for Foods

To be allowable, a competitive food item must:

Meet all the competitive food nutritive standards **AND** be a whole grain rich product

OR

Have as the first ingredient a fruit, vegetable, dairy product or protein food (meat, beans, poultry, etc.)

OR

Be a "combination food" with at least ¼ cups fruit and/or vegetable

Whole Grain Rich Products

A Whole Grain Rich Product must include 50% or more whole grains by weight **OR** have “whole grain” as the first ingredient.

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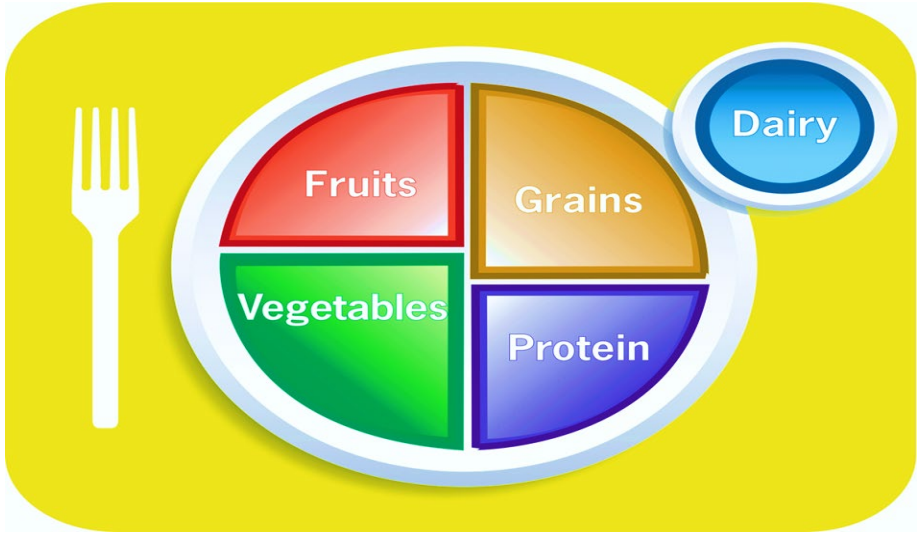
Major Food Groups

Have as the first ingredient a fruit, vegetable, dairy product or protein food (meat, beans, poultry, etc.)



Combination Foods

Be a “combination food” with at least ¼ cup fruit and/or vegetable

- Combination food means products that contain two or more components representing two or more of the recommended food groups: fruits, vegetable, dairy, protein or grains.
- Examples: Hummus and vegetables, fruit cobbler with whole grain rich crust, etc.

Definition of Entrée

An item that includes only the following three categories of main dish food items:

- A combination food of meat/meat alternate and whole grain rich food, or
- A combination food of vegetable or fruit and meat/meat alternate, or
- A meat/meat alternate alone, with exception of yogurt, low-fat or reduced fat cheese, nuts, seeds and nut or seed butters and meat snacks (i.e dried beef jerky and meat sticks)
- Breakfast (SFA determines which item(s) are the entrée) – May include whole grain rich items and can be exempted from the standards on day of and day after service (SP 35-2014).

Accompaniments

- Must be included in nutrient profile as part of the item served:

  Examples include:

  - Salad dressings
  - Butter or jelly on toast
  - Cream cheese on bagels
  - Garnishes

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Exemptions from General Nutrition Standards for Smart Snacks

Paired Exemptions

Paired Exemptions: items that have been designated as exempt from one or more of the nutrient requirements individually and packaged together without any additional ingredients.

- Peanut Butter and Celery (exempt from total fat and saturated fat but still must meet calorie and sodium requirements)
- Reduced fat cheese served with apples (exempt for fat and sugar limit but still must meet calorie and sodium limits)

Fruit & Vegetable Exemption

Are exempt from meeting **all** nutrient standards

- Fresh and frozen fruits and vegetables with no added ingredients
- Canned fruits with no added ingredients except for water, which are packed in 100% juice, extra light syrup or light syrup
- Low sodium/no sodium added canned vegetables with no added fats are exempt from all nutrient standards

NSLP & SBP Entrée Exemptions

Entrees with enriched grains may be served as smart snacks starting in 2024-25 SY.

Entrée exemption for day of service and school day after

Side dishes sold as competitive food must meet all standards

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Specific Nutrient Standards for Food

Nutrition Facts

Serving size	**About 17 crisps (28g)**
Amount per serving **Calories**	**120**
	% Daily Value*
Total Fat 3.5g	**4%**
Saturated Fat 0g	**0%**
Trans Fat 0g	
Polyunsaturated Fat 2g	
Monounsaturated Fat 1g	
Cholesterol 0mg	**0%**
Sodium 160mg	**7%**
Total Carbohydrate 22g	**8%**
Dietary Fiber 1g	**5%**
Total Sugars 2g	
Includes 2g Added Sugars	**3%**
Protein 2g	
Vitamin D 0mcg	0%
Calcium 10mg	0%
Iron 0.3mg	0%
Potassium 230mg	4%

* The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.

Nutrient Standards

- Total Fat
- Saturated Fat
- Trans Fat
- Sodium
- Calories
- Total Sugar

Nutrition Facts

Serving Size: 1 pastry (52g)

Amount Per Serving	
Calories 203	Calories from Fat 46
	% Daily Value*
Total Fat 5.1 g	**8%**
Saturated Fat 0.9 g	**4%**
Trans Fat	
Cholesterol 0 mg	**0%**
Sodium 198.12 mg	**8%**
Potassium 59.8 mg	**2%**
Total Carbohydrate 37.57 g	**13%**
Dietary Fiber 0.52 g	**2%**
Sugars 18.41 g	
Sugar Alcohols	
Protein 2.29 g	
Vitamin A 500.24 IU	10%
Vitamin C 0 mg	0%
Calcium 11.96 mg	1%
Iron 1.82 mg	10%

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Total Fat

- Items must be 35% or less of total calories from fat per item as packaged/served
- Exemptions include
  - Reduced fat cheese (including part-skim mozzarella)
  - Nuts and seeds and nut/seed butters
  - Products consisting of only dried fruit with nuts and/or seeds with no added nutritive sweeteners or fat
  - Seafood with no added fat, and
  - Whole eggs with no added fat
  - Beans, peas and lentils.

Saturated Fat

- Items must be 10% or less of total calories per item as packaged/served
- Exemptions for:
  - Reduced fat cheese (including part-skim mozzarella)
  - Nuts, seeds and nut/seed butters
  - Products consisting of only dried fruit with nuts and/or seeds with no added nutritive sweeteners or fat
  - Whole eggs with no added fat

Trans Fat

- Zero grams of trans fat per portion as packaged/served.

Sodium

Entrée Items (not served that day or day before)

- Items must have 480 mg or less of sodium per item as served, including any added accompaniments.

Snack & Side Items

- Items must have 200 mg or less per item as served, including any added accompaniments.

Calories

Entrée Items (not served that day or day before)

- Items must have 350 calories or less per item as served, including any added accompaniments.

Snack & Side Items

- Items must have 200 calories or less per item as served, including any added accompaniments.

Total Sugars

Items must have 35% or less of weight from total sugars per item.

Sugar Exemptions

Dried whole fruits or vegetables; dried whole fruit or vegetable pieces; and dehydrated fruits or vegetables with no added sweeteners

Dried whole fruits, or pieces, with nutritive sweeteners that are required for processing and/or palatability purposes (i.e. cranberries, tart cherries or blueberries)

Products consisting of only dried fruit with nuts and/or seeds with no added nutritive sweetener

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Nutrition Standards for Beverages

Standards for Beverages

- Vary by Grade Level
- Identify Specific Types of Beverages Allowed
- Address Container Size
- Beverages for All
  - Water
  - Milk
  - Juice

Elementary School Beverage Options

- Water – Plain, non-caloric. **No size limit.**
- Milk – Low fat milk or nonfat milk, flavored or unflavored (**8 ounces or less**).
- Juice – 100% fruit or vegetable juice or any combination of both totaling 100% with no added sweeteners will be allowed (**8 ounces or less**).
- No other beverages are allowed.

Middle School Beverage Options

- Water – Plain, non-caloric. No size limit.
- Milk – Low fat milk or nonfat milk, flavored or unflavored (**12 ounces or less**).
- Juice – 100% fruit or vegetable juice or any combination of both totaling 100% with no added sweeteners will be allowed (**12 ounces or less**).
- No other beverages are allowed

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High School Beverage Options

- Water – Plain, non-caloric, No size limit.
- Milk – Low fat milk or nonfat milk, flavored or unflavored (**12 ounces or less**).
- Juice – 100% fruit or vegetable juice or any combination of both totaling 100% with no added sweeteners will be allowed (**12 ounces or less**).
- Continued on next slide. →

High School Beverage Options (Cont'd)

- Calorie free Beverages - Any other flavored beverages (**20 ounces or less**) that are labeled to contain **5 calories or less per 8 ounce**, or **10 calories or less per 20 ounce.**
- Lower Calorie Beverages - Any other flavored beverages (**12 ounces or less**) that are labeled to contain **40 calories or less per 8 ounces**, or **60 calories or less per 12 ounces.**
- Beverages may contain caffeine.

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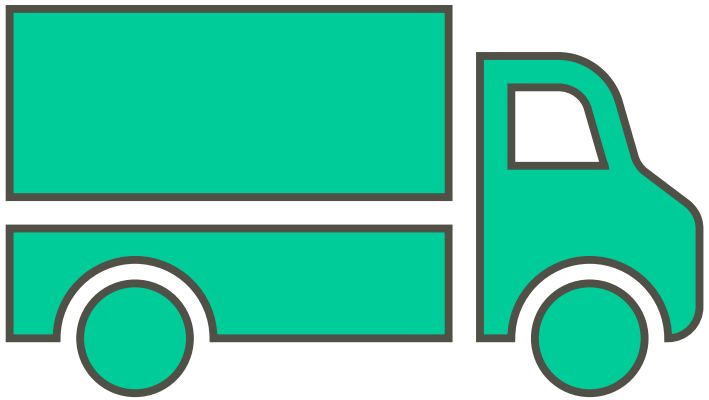
Best Practices for the Administrative Review

Sandy Wagner, SNS,
Program Coordinator

Recordkeeping

- LEAs and SFAs should maintain records such as receipts, nutrition labels and product specifications.
- SFAs maintain records for competitive foods sold under the nonprofit school food service account.
- LEAs maintain records for all other competitive food sales.

Product Accuracy



Product Delivery & Verification:

Staff should verify all products upon delivery. If a non-compliant product is substituted, you will need to contact your vendor to have this issue corrected.

Periodic Verification:

You should periodically check that your product formulations have not changed and that they are still in compliance with Smart Snacks standards. This should be done, at the least, at the start of each school year.

Off-Site Review Tool Tips

1100 - Smart Snacks	
1100.	What are the SFA's food sale policies? List all types of food/beverage sales to include the selling of non-food items in combination with food items. **Tool Tip:** Describe or **attach your district's food sale policies**. For example, the regulation of the sale of competitive foods or beverages sold to students during the school day, timeframes in which competitive foods can be sold, fundraising activities, policies that are included in the district's local wellness policy as it relates to food/beverage sales, etc.
1101.	What is the SFA's process for determining compliance with non-packaged or recipe food items (combination foods that do not have a label)? **Tool Tip:** Describe or **attach your process for determining compliance for non-packaged or recipe food items.** How do you ensure that your recipe food items, i.e. mashed potatoes/French fries, meets smart snack standards? What tools do you use to make this determination?
1102.	How does the SFA account for accompaniments when determining whether food items meet the Smart Snack standards? **Tool Tip:** Describe **or attach the process in place to determine the portion sizes (or average portion sizes) and associated nutrients (calories, fat, sodium, sugar) of accompaniments (i.e. ranch) sold.** Remember SFAs cannot sell accompaniments on their own (e.g. a side of ranch) unless they meet the Smart Snack standards. *Example: If you sell celery sticks with the accompaniment ranch a la carte, how would you determine if Smart Snack standards are met?*

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Off-Site Review Tool Tips (Cont'd)

1103.	Who is responsible for tracking Smart Snacks compliance at the: **Tool Tip:** The LEA and SFA should communicate with those who are responsible for tracking Smart Snacks compliance as there are many opportunities for this to occur outside of the food service department (ex. school stores, vending machines, student-run fundraisers, etc.). Food service directors are not responsible for Smart Snack compliance outside of food service. • **SFA Level:** List the administrator or other non-food service employee responsible for Smart Snack compliance for district related activities. • **School Level:** List the administrator or other non-food service employee responsible for Smart Snack compliance in the school building. • **Food service:** List the food service employee(s) responsible for Smart Snack compliance in the district and school building. a) SFA level: Superintendent or other designee b) School level: Principal **c)** For foodservice: Director/manager

Off Site Review

- New this year:
  - Requiring a list of all items plan to sell as smart snacks from Aug-Nov.
  - Includes entrees, side items, items sold outside of food service.
  - A percent of this list will be reviewed as part of the Administrative Review.

Other Considerations

Smart Snacks and Culinary Education Programs:

- Nutrition standards apply to all foods sold to students on the school campus during the school day, including food prepared and/or sold by culinary education programs. (SP 40-2014)

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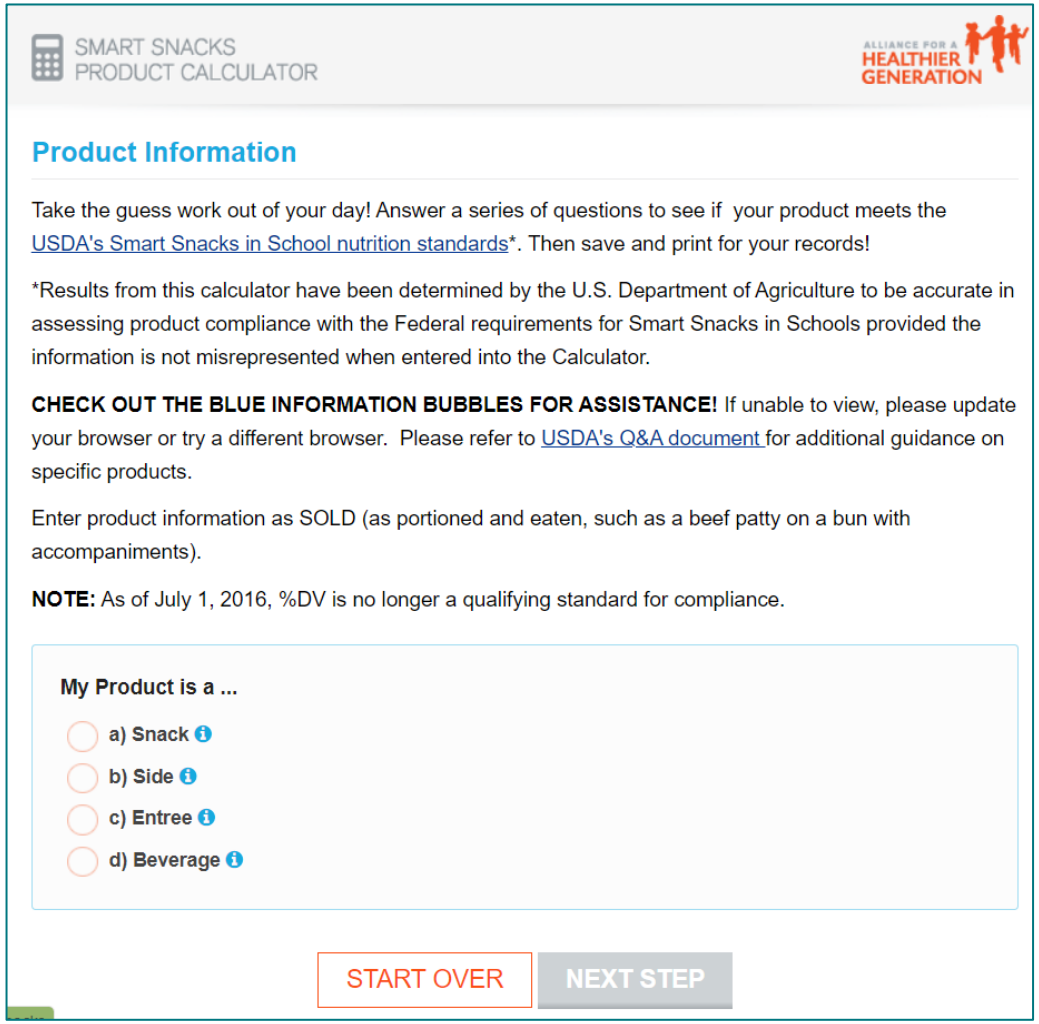
Alliance for A Healthier Generation Smart Snack Product Calculator

https://foodplanner.healthiergeneration.org/calculator/



My Product is a...

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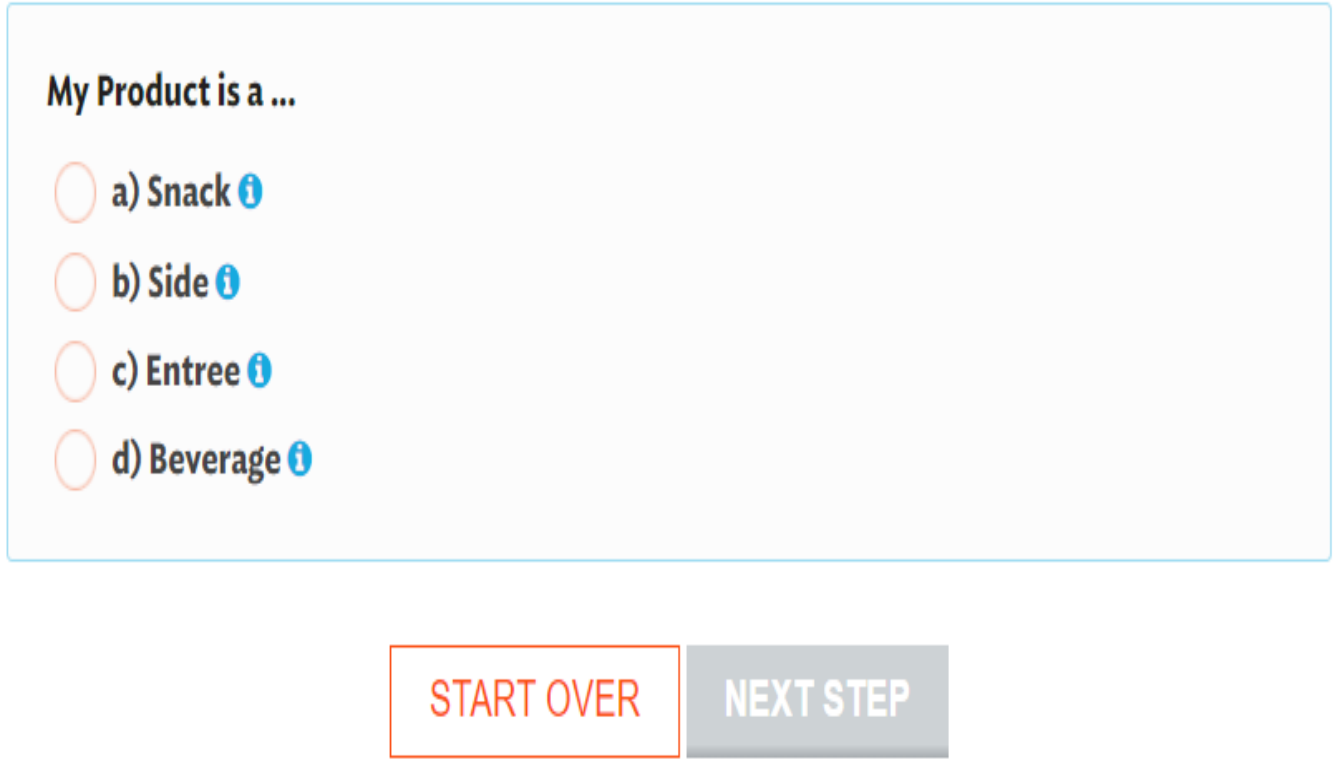
Snack: Includes products such as chips, popcorn, nuts, snack-type bars (i.e., cereal, granola and fruit and nut bars), ice cream and sometimes frozen fruit, including frozen juice, etc.

Side: A product that is sold in addition to an entrée at a meal, such as rice, steamed vegetables, mashed potatoes or French fries.

Entrée: If your entrée is served the same day or the day after you do not need to put in calculator, it is exempt.

Beverage: Remember, you will be asked to enter elementary, middle or high school.



What is the first ingredient?

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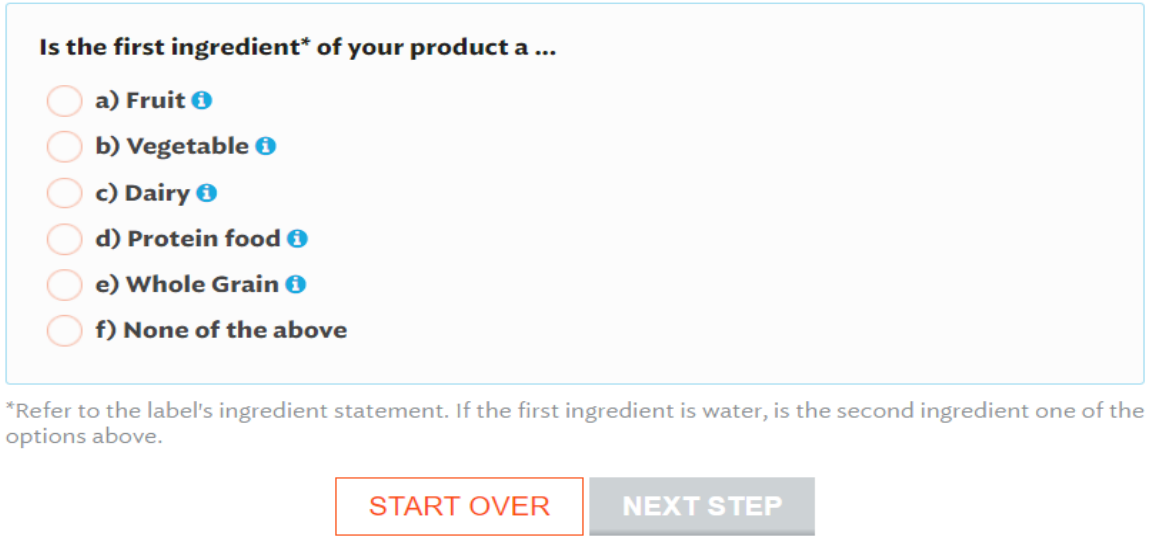
Fruit and Vegetable

PAIRED EXEMPTIONS:

Products pairing two items with exemptions are exempt from certain nutrient standards. For example, if the product is a fruit/vegetable with an exemption and is paired with a Protein Food (such as a nut, seed, nut or seed butter, fish or other seafood), please choose Protein Food and follow the prompts accordingly. If the product is a fruit/vegetable with an exemption and is paired with reduced fat cheese, please choose Dairy and follow the prompts accordingly. When entering nutrition information, remember to add the nutrient values together for the items in your paired exemption for final analysis.



NOTE:

If the first ingredient of your product is a fruit concentrate, concentrated juice or concentrated puree, please choose "None of the above". These are considered added sugars.

If potato flakes or dehydrated potato is the first ingredient in a vegetable product, such as potato chips, choose vegetable.

What is the first ingredient?

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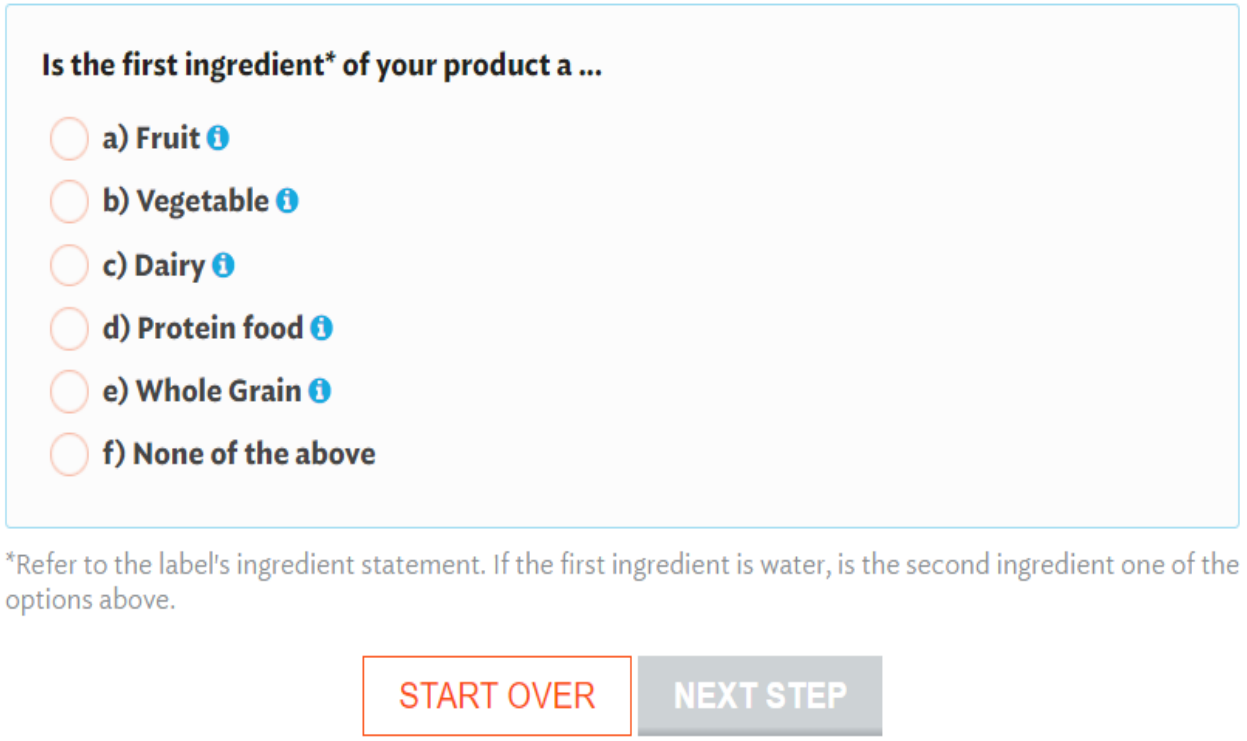
Dairy

Includes INGREDIENTS such as milk, yogurt and cheese. Does NOT include dairy beverages or dairy drinks (such as drinkable yogurt, milk shakes and protein shakes) or coffee drinks (such as cappuccinos, mochas, or lattes).



Smart Snack Calculator for Beverages

- For beverages will enter elementary, middle or high school. Will then ask type of beverage; if allowable for the age/grade will then continue with fluid ounces; if allowable for the age/grade will continue.

Questions??

Contact

- Olivia Thomas, RD, LD
  - Olivia.Thomas@education.ky.gov

- Sandy Wagner, SNS
  - Sandra.wagner@education.ky.gov

Thank You!

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Submit your completed form or letter to USDA by:

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Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;

(2) fax: (833) 256-1665 or (202) 690-7442; or

(3) email: program.intake@usda.gov.

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