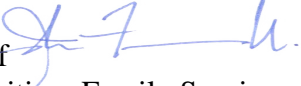




STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Sponsors of School Child Nutrition Programs

FROM: John Frassinelli, Chief 
Bureau of Health/Nutrition, Family Services and Adult Education

DATE: April 25, 2014

SUBJECT: Operational Memorandum #29-14
Federal and State Requirements for Grain-Only Entrees (Smart Snacks versus Connecticut Nutrition Standards)

This memorandum provides guidance regarding grain-only items as entrees in schools participating in the U.S. Department of Agriculture (USDA) school meal programs. These requirements are different for schools that participate in Healthy Food Certification (HFC) under Section 10-215f of the Connecticut General Statutes versus non-HFC public schools, private schools and residential child care institutions (RCCIs). The following information summarizes the requirements for non-HFC schools (see “Requirements for Grain-Only Entrees in Non-HFC Schools” below) and HFC schools (see “Requirements for Entrees in HFC Schools” on page 2).

Requirements for Grain-Only Entrees in Non-HFC Schools

This information clarifies the status of grain-only items as entrees under the USDA interim final rule, “[National School Lunch Program \(NSLP\) and School Breakfast Program \(SBP\): Nutrition Standards for All Foods Sold in School as required by the HRFKA of 2010](#),” also known as the Smart Snacks rule. This interim final rule was published on June 28, 2013, and is **effective July 1, 2014**.

The Smart Snacks rule defines an “entree item” as:

- a combination food of meat or meat alternate and whole grain-rich food; or
- a combination food of vegetable or fruit and meat or meat alternate; or
- a meat or meat alternate alone with the exception of yogurt, low-fat or reduced fat cheese, nuts, seeds and nut or seed butters, and meat snacks (such as dried beef jerky).

The interim final rule does not include grain-only items such as bagels, muffins and waffles as entree items. However, the USDA understands this may limit the availability of products which are healthy choices that students are accustomed to having for breakfast. Therefore, a school food authority (SFA) is permitted to determine which item(s) are entree items for breakfasts offered as part of the SBP.

As with NSLP entree items, any entree item offered as part of the SBP is exempt from all competitive food standards if it is offered as a competitive food on the day of or the day after it is served in the SBP. For example, if the SFA serves whole grain-rich pancakes as the main dish for the SBP, they can be considered an entree and be exempt from the standards on the day of service and the day after service. Exempt entree items offered as competitive foods must be offered in the same or smaller portion sizes as the NSLP or SBP and with the same accompaniments.

Side dishes offered as part of the NSLP or SBP and also sold a la carte must always meet the Smart Snacks nutrition standards. Side dishes and snacks offered as part of a reimbursable lunch or breakfast are not exempt from the Smart Snacks nutrition standards. In the previous example, all other items offered as part of the pancake meal are considered side dishes and would therefore **not** be exempt from the Smart Snacks requirements.

When a school does not participate in the SBP and offers grain-only items for sale, these items and any accompaniments must meet all Smart Snacks standards for side dishes or snack items whenever they are sold to students.

For more information on the USDA Smart Snacks standards, see the Connecticut State Department of Education's (CSDE) [Competitive Foods](#) Web page and the USDA [Smart Snacks in School](#) Web page.

Requirements for Entrees in HFC Schools

Public schools that participate in HFC under Section 10-215f of the Connecticut General Statutes must follow the [Connecticut Nutrition Standards](#) for all foods sold in schools. The Connecticut Nutrition Standards meet or exceed the USDA Smart Snacks standards for competitive foods. They apply to all sources of food sales on school premises at all times, not just during the school day.

The definition for "entree item" under the Connecticut Nutrition Standards is the same as the definition under the USDA Smart Snacks nutrition standards. An "entree item" is:

- a combination food of meat/meat alternate and whole grain-rich food (e.g., turkey sandwich, pizza, hamburger on a bun and cheese burrito);
- a combination food of vegetable/fruit and meat/meat alternate (e.g., chef's salad, fruit and cheese platter, baked potato with chili, chicken vegetable stir-fry); and
- a meat/meat alternate alone (e.g., sausage patty, egg, chicken nuggets), excluding yogurt, low-fat or reduced fat cheese, nuts, seeds and nut or seed butters and meat snacks, e.g., jerky and meat sticks. Yogurt, cheese, nuts, seeds, nut/seed butters and meat snacks must meet the nutrient standards for the "Snacks" category.

Entree items that are sold a la carte on the **same day** that they are planned and served as part of a reimbursable school meal are exempt from all nutrient standards if they:

- are the same or smaller portion size as the NSLP and SBP;
- have the same accompaniments;
- meet the trans fat standard; and
- do not contain artificial sweeteners, nonnutritive sweeteners, sugar alcohols or chemically altered fat substitutes.

This exemption applies ONLY to entree items that are sold a la carte on the same day that they are planned and sold as part of a reimbursable meal. It does not apply to any other meal items that are also sold a la carte such as fruits, vegetables, soups, breads, rice and pasta.

All other non-entree meal items that are sold a la carte are not exempt and must meet all nutrient standards. Under the Connecticut Nutrition Standards, grain-only items such as whole grain-rich muffins, pancakes and bagels are **not** entree items and must meet all required

standards for the appropriate food category. Grain-only items that are part of a reimbursable breakfast can only be sold a la carte if they meet at least one general standard and all nutrient standards for the “Snacks” category.

Foods that do not meet the Connecticut Nutrition Standards can only be sold to students on school premises if the local board of education or school governing authority votes to allow exemptions (as indicated on the district’s annual ED-099 Addendum, [Healthy Food Certification Statement](#)) and the following three conditions are met: 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 are not sold from a vending machine or school store.

For more information on the difference between the federal and state requirements for competitive foods, see the CSDE’s handout, [Comparison Chart of USDA Competitive Foods Standards and Connecticut Nutrition Standards](#).

Questions may be directed to:

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