

Comparison of U.S. Department of Agriculture (USDA) Smart Snacks and Connecticut Nutrition Standards

SCHOOL YEARS 2016-17 AND 2017-18

This document summarizes the differences between the federal and state nutrition standards for competitive foods, based on the U.S. Department of Agriculture's (USDA) Smart Snacks standards in the final rule, *National School Lunch Program and School Breakfast Program: Nutrition Standards for All Foods Sold in School* (Federal Register, Vol. 81, No. 146, July 29, 2016), and the Connecticut State Department of Education's (CSDE) Connecticut Nutrition Standards (CNS). Section 1 addresses the definitions that apply to the nutrition standards (see pages 2-6), section 2 addresses the specific standards for foods and nutrients including any allowable exemptions (see pages 7-16), and section 3 addresses beverages (see pages 17-18).

Smart Snacks took effect on July 1, 2014, under the *interim final rule* (Federal Register, Vol. 78, No. 125, June 28, 2013). The final rule revisions took effect on September 27, 2016. Schools that follow the CNS will exceed the USDA Smart Snacks standards. The state nutrition standards committee aligned the CNS with Smart Snacks except when doing so would weaken the integrity of Connecticut's current standards or be inconsistent with state statutes.

RESOURCES

- Beverage Requirements (CSDE Web Page): www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=322418
- Competitive Foods (CSDE Web Page): www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=333772
- Connecticut Nutrition Standards (CSDE Web Page): www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=322422
- *Connecticut Nutrition Standards PowerPoint*: www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/hfc/cnsppt.pdf
- *Connecticut Nutrition Standards for Foods in Schools*: www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/cns2017.pdf
- *Guide to Competitive Foods in Schools*: www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/cf/cfg.pdf
- *List of Acceptable Foods and Beverages*: www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=322432
- *Summary of CNS*: www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/hfc/summarycns2017.pdf
- *Summary of Smart Snacks*: www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/cf/smartsnacks.pdf



For more information, visit the CSDE's [HFC](#), [CNS](#) and [Smart Snacks](#) Web pages or 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, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103, 860-807-2075, susan.fiore@ct.gov.

This document is available at www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/hfc/cnscomparisonchart.pdf.

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Comparison of Smart Snacks and Connecticut Nutrition Standards, continued

SECTION 1 – DEFINITIONS			
Term	USDA Smart Snacks	CNS	Stricter?
D1 acceptable grain products	<p>Acceptable grain products must contain 50 percent or more whole grains by weight or have whole grains as the first ingredient. If water is the first ingredient, the second ingredient must be a whole grain.</p> <p>Note: This definition is inconsistent with the WGR definition for school meals under the USDA final rule, <i>Nutrition Standards for the National School Lunch and School Breakfast Programs</i> (77 FR 4088), which updates the school meals offered under the NSLP and SBP, as required by the Healthy, Hunger-Free Kids Act of 2010 (Public Law 111-296). Under the USDA final rule for meals in the NSLP and SBP, whole grain-rich foods must contain 50 percent or more whole grains by weight and any other grain ingredients must be enriched. Products that contain any noncreditable grains at levels of more than two percent of the product formula (¼ ounce equivalent) do not meet this standard. The definition of acceptable grain products in the Smart Snacks final rule does not include these criteria.</p>	<p>Acceptable grain products are whole grain-rich (WGR). A WGR food item is a grain product that: 1) contains at least 50 percent whole grains by weight or has a whole grain as the first ingredient*; 2) any remaining grain ingredients are enriched; and 3) any noncreditable grains, such as bran, germ, and modified food starch, are less than two percent of the product formula. To comply with this limit, the combined total of all noncreditable grains cannot exceed 3.99 grams for groups A-G (baked goods) or 6.99 grams for groups H (cereal grains) and I (ready-to-eat breakfast cereals) of the USDA ounce equivalents chart. **</p> <p>* If water is the first ingredient, the second ingredient must be a whole grain.</p> <p>** An “ounce equivalent” of grains is the amount of food that meets the USDA serving size requirement for 1 ounce of grain in the meal patterns for the NSLP and the SBP. For more information on the WGR requirements and noncreditable grains, see the CSDE’s handout, Criteria for Whole Grain-rich Foods, and the CSDE’s Menu Planning Guide for School Meals.</p>	State
D2 combination foods	<p>Products that contain two or more components representing two or more of the recommended food groups: fruit, vegetable, dairy, protein, or grains.</p>	<p>Products that contain two or more components representing two or more of the recommended food groups: fruit, vegetable, dairy, protein, or grains. For example, macaroni and cheese contains pasta (grains) and cheese (protein). Combination foods generally cannot be separated (such as pizza or a burrito) or are not intended to be separated (such as hamburger on a bun or turkey sandwich). Combination foods include both entree items (see D4) and non-entree foods (see D5).</p>	Same

Comparison of Smart Snacks and Connecticut Nutrition Standards, continued

SECTION 1 – DEFINITIONS, continued			
Term	USDA Smart Snacks	CNS	Stricter?
D3 competitive food	All food and beverages other than meals reimbursed under programs authorized by the Richard B. Russell National School Lunch Act and the Child Nutrition Act of 1966 available for sale to students on the school campus during the school day.	<p>Any foods and beverages sold to children anytime on school premises other than meals served through the USDA school meal programs. Competitive food sales include, but are not limited to, cafeteria a la carte sales, vending machines, school stores, and fundraisers.</p> <p>Note: Sections 10-215e and 10-215f of the Connecticut General Statutes (C.G.S.) require that the CNS applies to all foods sold separately from reimbursable meals at all times, not just during the school day. Therefore, the state statutes supersede the time period in the USDA final rule.</p> <ul style="list-style-type: none"> • Section 10-215e. Nutrition standards for food that is not part of lunch or breakfast program. Not later than August 1, 2006, and January first of each year thereafter, the Department of Education shall publish a set of nutrition standards for food items offered for sale to students at schools. Such standards shall not apply to food sold as part of the National School Lunch Program and School Breakfast Program unless such items are purchased separately from a school lunch or breakfast that is reimbursable under such program. • Section 10-215f. Certification that food meets nutrition standards. Each local and regional board of education, the regional vocational-technical school system, and the governing authority for each state charter school, interdistrict magnet school, and endowed academy approved pursuant to section 10-34 that participates in the National School Lunch Program shall certify in its annual application to the Department of Education for school lunch funding whether, during the school year for which such application is submitted, all food items made available for sale to students in schools under its jurisdiction and not exempted from the nutrition standards published by the Department of Education pursuant to section 10-215e will meet said standards. Except as otherwise provided in subsection (b) of this section, such certification shall include food not exempted from said nutrition standards and offered for sale to students at all times, and from all sources, including, but not limited to, school stores, vending machines, school cafeterias, and any fundraising activities on school premises, whether or not school sponsored. <p>(b) Each board of education, the regional vocational-technical school system and each governing authority that certifies pursuant to this section compliance with the department's nutrition standards for food may exclude from such certification the sale to students of food items that do not meet such standards, provided (1) such sale is in connection with an event occurring after the end of the regular school day or on the weekend, (2) such sale is at the location of such event, and (3) such food is not sold from a vending machine or school store.</p>	State

Comparison of Smart Snacks and Connecticut Nutrition Standards, continued

SECTION 1 – DEFINITIONS, continued			
Term	USDA Smart Snacks	CNS	Stricter?
D4 entree items	<p>An item that includes only the following three categories of food items intended as the main dish:</p> <ul style="list-style-type: none"> • a combination food of meat or meat alternate and whole grain rich food; • 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; or • whole grain-rich grain-only breakfast entrees * served in the SBP. <p>* A school food authority is permitted to determine which whole grain-rich grain-only breakfast entrees are entree items for breakfasts offered as part of the SBP. Allowable breakfast entrees are subject to the entree exemptions allowed in the rule on the day of and the day after service in the SBP. Such entree items also may be served at lunch in the NSLP on the day of or the day after service in the SBP (see S9 in section 2). For more information, see USDA memo SP 35-2014: Grain Entrees Related to the Smart Snacks in School Standards.</p>	<p>For the CNS, entree items include only three categories of main dish food items:</p> <ul style="list-style-type: none"> • a combination food of meat/meat alternate and WGR food, e.g., breakfast egg sandwich on whole-wheat English muffin, turkey wrap on whole-wheat tortilla, pizza with WGR crust, hamburger on whole-grain bun and bean burrito with whole-corn tortilla; • a combination food of vegetable/fruit and meat/meat alternate, e.g., chef’s salad with turkey, cheese and hard-boiled egg, fruit and cheese platter, yogurt and fruit parfait, school-made yogurt and fruit/vegetable smoothies, baked potato with chili and chicken vegetable stir-fry; and • a meat/meat alternate alone (e.g., sausage patty, hard-boiled egg, grilled chicken), excluding yogurt, cheese, nuts and seeds, nut and seed butters, and meat snacks, e.g., beef jerky and meat sticks. These foods must comply with the standards for the “Snacks” category (see S4 in section 2). <p>Note: The CNS entrée definition does not include does include grain-only breakfast items. All grain-only products must comply with the CNS for the snacks category. They are not eligible for the exemption for entrées sold a la carte on the same day that they are planned and sold as part of a reimbursable meal (see S9 in section 2). For more information, see CSDE Operational Memorandum 29-14: Federal and State Requirements for Grain-Only Entrees (Smart Snacks versus Connecticut Nutrition Standards).</p>	State
D5 non-entree combination foods	No definition	<p>Products that do not meet the definition of entree items but that contain two or more components representing two or more of the recommended food groups: fruit, vegetable, dairy, protein or grains. This category addresses nutrient-rich combination foods that are not entrees such as yogurt and fruit parfaits, peanut butter with carrot sticks and hummus dip with vegetables. These foods either:</p> <ul style="list-style-type: none"> • do not meet the main dish criteria for entree items (see D4); or • do not provide the minimum meal pattern requirements for meat/meat alternates and grains together or meat/meat alternates alone. 	Not applicable

Comparison of Smart Snacks and Connecticut Nutrition Standards, continued

SECTION 1 – DEFINITIONS, continued			
Term	USDA Smart Snacks	CNS	Stricter?
D6 paired exempt food	paired exempt foods: Foods that when packaged together and sold with other products (without added ingredients) retain their individually designated exemption for total fat, saturated fat, and sugar. For example, peanut butter is exempt from the total fat and saturated fat requirements. When it is paired with a vegetable or fruit, such as celery or apples, the paired snack retains the total fat and saturated fat exemptions and may be served if the calorie and sodium limits are met. For more information, see USDA memo SP 63-2014: Smart Snacks Standards for Exempt Foods when Paired Together .	The CNS does not allow paired exemptions. For more information, see CSDE Operational Memorandum No. 59-14: Smart Snacks Standards for Exempt Foods when Paired Together .	State
D7 school day	The period from the midnight before to 30 minutes after the end of the official school day.	The regular school day is the period from midnight before to 30 minutes after the end of the official school day. Note: “School day” is used only for the purposes of food exemptions because C.G.S. Section 10-215f (HFC) requires the CNS to apply to all food sales at all times except for the allowed food exemptions (see D3). Therefore, the state statute supersedes the time period (school day) in USDA Smart Snacks final rule.	Same
D8 school campus	All areas of the property under the jurisdiction of the school that are accessible to students during the school day.	School premises: All areas of the property under the jurisdiction of the local and regional board of education, the regional vocational-technical school system and the governing authority district or school. Note: C.G.S. Section 10-215f (HFC) requires that the CNS applies to all food items made available for sale to students in public schools under the jurisdiction of the local and regional board of education, the regional vocational-technical school system and the governing authority district or school “ at all times , and from all sources,” not just during the school day (see D3). Therefore, the state statute supersedes the time period (school day) in the USDA Smart Snacks final rule.	State

Comparison of Smart Snacks and Connecticut Nutrition Standards, continued

SECTION 2 – NUTRITION STANDARDS			
Criteria	USDA Smart Snacks	CNS	Stricter?
S1 Who Must Comply	The USDA final rule nutrition standards apply to all schools that participate in the National School Lunch Program (NSLP) and School Breakfast Program (SBP), including public, private and residential child care institutions (RCCIs).	<p>The CNS applies only to all public schools that have certified for the healthy food option of Healthy Food Certification (HFC). This is indicated on each public school district’s annual <i>Healthy Food Certification Statement, Addendum to Agreement for Child Nutrition Programs (ED-099)</i>, submitted to the CSDE by July 1 of each year. Private schools and RCCIs are not eligible to participate in HFC under C.G.S. Section 10-215f.</p> <p>Note: Eligibility for HFC is legislated by state statute. The C.G.S. apply only to public schools. Under C.G.S. Section 10-215f, HFC applies only to each local and regional board of education, the regional vocational-technical school system, and the governing authority for each state charter school, interdistrict magnet school, and endowed academy that participates in the National School Lunch Program.</p>	Federal
S2 Timeframe	The USDA final rule nutrition standards apply to all foods sold (a) outside the school meal programs; (b) on the school campus; and (c) at any time during the school day.	<p>The CNS applies to all a la carte foods offered for sale to students at all times, in all schools and from all sources including school stores, vending machines, school cafeterias, fundraising activities on school premises and any other sources of food sales.</p> <p>Foods that do not meet the CNS 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 in section 3 of the 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.</p> <p>For the definition of “school day,” see D7 in section 1. An “event” is an occurrence that involves more than just a regularly scheduled practice, meeting or extracurricular activity, e.g., soccer games, school plays, and school debates are events but soccer practices, play rehearsals, and debate team meetings are not. “Location” means where the event is being held. For example, cookies could be sold on the side of the soccer field during a soccer game, but cannot be sold in the school cafeteria while a game is played on the soccer field.</p> <p>For information on fundraiser requirements, see S6.</p> <p>Note: This timeframe is legislated by state statute. C.G.S. Section 10-215f requires that the CNS applies to all foods sold separately from reimbursable meals at all times not just during the school day (see D3 in section 1). Therefore, the state statute supersedes the time period in USDA Smart Snacks final rule.</p>	State

Comparison of Smart Snacks and Connecticut Nutrition Standards, continued

SECTION 2 – NUTRITION STANDARDS, continued			
Criteria	USDA Smart Snacks	CNS	Stricter?
S3 Additional Funding	None	C.G.S. Section 10-215b requires that districts that choose the healthy food option of HFC receive an additional 10 cents per lunch, based on the total number of reimbursable lunches (paid, free, and reduced) served in the district in the prior school year.	Not applicable
S4 Food Categories	<p>The final rule groups competitive foods into the following three categories: 1) Entree Items (Sold Only A La Carte); 2) Side Dishes; and 3) Beverages. To be allowed for sale to students, a competitive food item must meet:</p> <ul style="list-style-type: none"> • at least one of the three general standards (see “General Standards” in S8); and • all of the competitive food nutrient standards. <p>All foods are evaluated for compliance with the competitive food standards based on the amount of the food item as served, including any added accompaniments.</p>	<p>The CNS groups competitive foods into the following six categories: 1) Snacks; 2) Entree Items (Sold Only A La Carte); 3) Non-entree Combination Foods; 4) Fruits and Vegetables; 5) Cooked Grains; and 6) Soups. To be allowed for sale to students, a competitive food item must meet:</p> <ul style="list-style-type: none"> • at least one of the three general standards (see “General Standards” in S8); and • all of the nutrient standards for the specific food category. <p>All foods are evaluated for compliance with the CNS based on the amount of the food item as served, including any added accompaniments.</p> <p>Note: The CNS addresses only foods. The requirements for beverages are separate from the CNS, and are legislated through C.G.S. Section 10-221q. Some state beverage requirements are different from Smart Snacks. Schools must follow whichever requirements are stricter (see S24 in section 3).</p>	Not applicable
S5 Portion Size	The nutrient standards apply to the item as packaged or served, including any accompaniments. The individual serving size or package cannot exceed 350 calories for entrees or 200 calories for all other foods.	The nutrient standards apply to the item as packaged or served, including any accompaniments. The individual serving size or package cannot exceed 350 calories for entrees or 200 calories for all other foods.	Same

Comparison of Smart Snacks and Connecticut Nutrition Standards, continued

SECTION 2 – NUTRITION STANDARDS, continued			
Criteria	USDA Smart Snacks	CNS	Stricter?
S6 Fundraisers	<p>The USDA allows a special exemption to the standards for foods and beverages that do not meet the Smart Snacks nutrition standards but that are sold for the purpose of conducting infrequent school-sponsored fundraisers. Such exempt fundraisers must not occur more often than the frequency specified by the state agency. Exempted fundraiser foods or beverages may not be sold in competition with school meals in the food serving area during the meal service.</p> <p>Note: The state agency (CSDE) does not allow exemptions for fundraisers. Therefore, all fundraisers sold during the school day must meet the competitive foods standards of the USDA final rule.</p>	<p>The CNS applies to all food items sold to students separately from a reimbursable breakfast or lunch at all times and from all sources, including all fundraising activities on school premises, regardless of whether they are sponsored by the school or an outside group. They also apply if students are involved in delivering money to school for the food items and picking up the food items at school. This constitutes selling food to students on school premises. These fundraisers can comply with Section 10-215f if students bring the orders and money to school but parents or other adults pick up the food items instead of students.</p> <p>Foods that do not meet the CNS can only be sold to students on school premises if the local board of education or school governing authority votes to allow exemptions and:</p> <ul style="list-style-type: none"> • the sale is in connection with an event occurring after the end of the regular school day or on the weekend; • the sale is at the location of the event; and • the foods are not sold from a vending machine or school store. <p>The following resources provide more information on the fundraiser requirements for HFC schools:</p> <ul style="list-style-type: none"> • Food and Beverage Requirements for Fundraisers • Food and Beverage Requirements for School Stores • Food and Beverage Requirements for Vending Machines • Fundraiser Requirements PowerPoint <p>Note: Fundraiser compliance is legislated by state statute. C.G.S. Section 10-215f requires that the CNS applies to all foods sold separately from reimbursable meals at all times and from all sources including “any fundraising activities on school premises, whether or not school sponsored” (see D3 in section 1). Therefore, the state statute supersedes the interim final rule.</p>	State
S7 Career Centers and Culinary Arts Programs	<p>The USDA is willing to consider each situation on a case by case basis, and provide a waiver where appropriate. State agencies are advised to contact FNS’ Regional Offices as situations arise.</p> <p>For more information, see USDA memo SP 40-2014: Smart Snacks Nutrition Standards and Culinary Education Programs.</p>	<p>The CNS applies to all food items sold to students separately from a reimbursable breakfast or lunch at all times and from all sources, including all foods sold to students as part of culinary programs.</p> <p>Note: These requirements are legislated by state statute. C.G.S. Section 10-215f requires that the CNS applies to all foods sold separately from reimbursable meals at all times and from all sources (see D3 in section 1). Foods sold to students in Career Centers and Culinary Arts Programs must follow the CNS. Therefore, the state statute supersedes the waiver for Career Centers and Culinary Arts Programs in USDA Smart Snacks final rule. For more information, see CSDE Operational Memorandum 31-14: Federal and State Requirements for Culinary Education Programs (Smart Snacks versus Connecticut Nutrition Standards).</p>	State

Comparison of Smart Snacks and Connecticut Nutrition Standards, continued

SECTION 2 – NUTRITION STANDARDS, continued			
Criteria	USDA Smart Snacks	CNS	Stricter?
<p>S8 General Standards for Competitive Food</p>	<p>To be allowable, a competitive food item must:</p> <ol style="list-style-type: none"> meet all of the proposed competitive food nutrient standards; and be a grain product that contains 50% or more whole grains by weight or have whole grains as the first ingredient*; or have as the first ingredient* one of the non-grain main food groups: fruits, vegetables, dairy, or protein foods (meat, beans, poultry, seafood, eggs, nuts, seeds, etc.); or be a combination food that contains at least ¼ cup fruit and/or vegetable. <p>* If water is the first ingredient, the second ingredient must be one of the above.</p> <p>Exemptions:</p> <ul style="list-style-type: none"> Fresh fruits and vegetables with no added ingredients except water are exempt from all nutrient standards. Canned and frozen fruits with no added ingredients except water, or are packed in 100% juice, extra light syrup, or light syrup are exempt from all nutrient standards. Low sodium/no salt added canned vegetables with no added fats are exempt from all nutrient standards. 	<p>To be allowable, a competitive food item must meet all nutrient standards and at least one of the following three criteria:</p> <ol style="list-style-type: none"> Whole Grain-rich (WGR) Foods: The food item is a grain product that: 1) contains at least 50 percent whole grains by weight or has a whole grain as the first ingredient*; 2) any remaining grain ingredients are enriched; and 3) any noncreditable grains, such as bran, germ and modified food starch, are less than two percent of the product formula. To comply with this limit, the combined total of all noncreditable grains cannot exceed 3.99 grams for groups A-G (baked goods) or 6.99 grams for groups H (cereal grains) and I (ready-to-eat breakfast cereals) of the USDA ounce equivalents chart. <ul style="list-style-type: none"> * If water is the first ingredient, the second ingredient must be a whole grain. ** An “ounce equivalent” of grains is the amount of food that meets the USDA serving size requirement for 1 ounce of grain in the meal patterns for the NSLP and the SBP. For more information on the WGR requirements and noncreditable grains, see the CSDE’s handout, Criteria for Whole Grain-rich Foods, and the CSDE’s Menu Planning Guide for School Meals. Food Groups: The food item has one of the following food groups as the first ingredient: fruits, vegetables, dairy or protein foods, e.g., meat, beans, poultry, seafood, eggs, nuts, and seeds. If water is the first ingredient, the second ingredient must be a fruit, vegetable, whole grain, dairy, or protein food. Combination Foods: The food item is a combination food that contains at least ¼ cup of fruit and/or vegetable. <p>Exemptions:</p> <p>The following foods are exempt from the general standards and all nutrient standards:</p> <ul style="list-style-type: none"> Fresh and frozen fruits and vegetables with no added ingredients except water. Canned fruits with no added ingredients except water or that are packed in 100 percent juice, extra light syrup or light syrup, all without added artificial sweeteners, nonnutritive sweeteners, sugar alcohols or fats (including chemically altered fat substitutes). Low sodium/no salt added canned vegetables with no added fats are exempt from all nutrient standards. <p>All other food products are not exempt and must meet at least one of the general standards and all nutrient standards for the specific food category (see S4).</p>	<p>State</p>

Comparison of Smart Snacks and Connecticut Nutrition Standards, continued

SECTION 2 – NUTRITION STANDARDS, continued			
Criteria	USDA Smart Snacks	CNS	Stricter?
S9 NSLP/SBP Entree Items Sold A la Carte	<p>Any entree item offered as part of the lunch program or the breakfast program is exempt from all competitive food standards if it is sold as a competitive food on the day of service or the day after service in the lunch or breakfast program.</p> <p>Exempt entrees that are sold as competitive food must be offered in the same or smaller portion sizes as the NSLP and SBP, and with the same accompaniments.</p>	<p>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:</p> <ul style="list-style-type: none"> • 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. <p>This provision 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.</p>	State
S10 Sugar-free Chewing Gum	Sugar-free chewing gum is exempt from all competitive food standards.	All gum (including sugar-free) is prohibited.	State
S11 Grain Items	<p>Acceptable grain items must include 50% or more whole grains by weight, or have whole grains as the first ingredient.</p> <p>Note: This is inconsistent with the definition of whole grain-rich foods under the NSLP and SBP regulations. In the NSLP and SBP, whole grain-rich products must contain at least 50 percent whole grains and any remaining grains must be enriched (see D1).</p>	<p>Acceptable grain items must contain 50 percent or more whole grains by weight (or have whole grains as the first ingredient) and any remaining grain ingredients must be enriched.</p> <p>Products that contain any noncreditable grains at levels of more than two percent of the product formula (¼ ounce equivalent) do not meet this standard. Examples of noncreditable grain ingredients include oat fiber, corn fiber, wheat starch, corn starch, bran, germ, and modified food starch including potato, legume, and other vegetable flours.</p> <p>* An “ounce equivalent” of grains is the amount of food that meets the USDA serving size requirement for 1 ounce of grain in the meal patterns for the NSLP and the SBP. For more information on the grains component of the NSLP and SBP meal patterns, see the CSDE’s Menu Planning Guide for School Meals.</p>	State

Comparison of Smart Snacks and Connecticut Nutrition Standards, continued

SECTION 2 – NUTRITION STANDARDS, continued			
Criteria	USDA Smart Snacks	CNS	Stricter?
<p>S12 Total Fat</p>	<p>Acceptable food items must have ≤ 35% calories from total fat as served, including any added accompaniments.</p> <p>Exemptions:</p> <ul style="list-style-type: none"> • Reduced fat cheese (including part-skim mozzarella) is exempt from the total fat standard. • Nuts and seeds and nut/seed butters are exempt from the total fat standard. • Products consisting of only dried fruit with nuts and/or seeds with no added nutritive sweeteners or fats are exempt from the total fat standard. • Seafood with no added fat is exempt from the total fat standard. • Whole eggs with no added fat are exempt from the total fat standard. <p>Combination products other than paired exempt foods are not exempt and must meet all the nutrient standards.</p>	<p>No more than 35 percent of calories from total fat as served, including any added accompaniments. No chemically altered fat substitutes.</p> <p>Exemptions: The following foods are exempt from the fat standard but cannot contain chemically altered fat substitutes:</p> <ul style="list-style-type: none"> • low-fat or reduced fat 100 percent natural cheese (including part-skim mozzarella); • nuts, seeds, and nut/seed butters; and • products consisting of only dried fruit with nuts and/or seeds with no added sweeteners or fats (including chemically altered fat substitutes); • seafood with no added fat (including chemically altered fat substitutes); and • whole eggs with no added fat. <p>All other foods are not exempt and must meet the fat standard. The fat exemption does not apply to combination foods (e.g., macaroni and cheese, peanut butter sandwich and trail mix) or foods containing cheese, nuts, seeds, nut/seed butters, and dried fruit as ingredients, e.g., peanut butter cookies, pecan cookies, granola bars with nuts, cranberry walnut muffin, cheese crackers, cheese sauce, peanut butter crackers, and sesame seed crackers.</p> <p>Entree Exemptions: Entrees that are sold a la carte on the same day that they are sold as part of reimbursable meals are exempt from all nutrient standards if they meet the entree exemption criteria (see S9 in this section).</p>	<p>State</p>

Comparison of Smart Snacks and Connecticut Nutrition Standards, continued

SECTION 2 – NUTRITION STANDARDS, continued			
Criteria	USDA Smart Snacks	CNS	Stricter?
S13 Saturated Fat	<p>Acceptable food items must have < 10% calories from saturated fat as served, including any added accompaniments.</p> <p>Exemptions:</p> <ul style="list-style-type: none"> • Reduced fat cheese (including part-skim mozzarella) is exempt from the saturated fat standard. • Nuts and seeds and nut/seed butters are exempt from the saturated fat standard. • Products consisting of only dried fruit with nuts and/or seeds with no added nutritive sweeteners or fats are exempt from the saturated fat standard. • Whole eggs with no added fat are exempt from the total fat standard. <p>Combination products other than paired exempt foods are not exempt and must meet all the nutrient standards.</p> <p>Entree Exemptions: Entree items served as an NSLP or SBP entrees are exempt from all competitive food standards if they are sold a la carte on the day of or day after service in the program meal (see S9 in this section).</p>	<p>Less than 10 percent of calories from saturated fat as served, including any added accompaniments.</p> <p>Exemptions: The following foods are exempt from the saturated fat standard:</p> <ul style="list-style-type: none"> • low-fat or reduced fat 100 percent natural 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 sweeteners or fats (including chemically altered fat substitutes); and • whole eggs with no added fat. <p>All other foods are not exempt and must meet the fat standard. The fat exemption does not apply to combination foods (e.g., macaroni and cheese, peanut butter sandwich, and trail mix) or foods containing cheese, nuts, seeds, nut/seed butters, and dried fruit as ingredients, e.g., peanut butter cookies, pecan cookies, granola bars with nuts, cranberry walnut muffin, cheese crackers, cheese sauce, peanut butter crackers, and sesame seed crackers.</p> <p>Entree Exemptions: Entrees that are sold a la carte on the same day that they are sold as part of reimbursable meals are exempt from all nutrient standards if they meet the entree exemption criteria (see S9 in this section).</p>	State
S14 Trans Fat	<p>Zero grams of trans fat as served (≤ 0.5 g per portion) including any added accompaniments.</p>	<p>Zero trans fat (less than 0.5 gram) as served, including any added accompaniments. Effective July 1, 2015, all products must be 100 percent trans fat free including any added accompaniments. Labels must indicate zero trans fat as served and the ingredients statement cannot contain any partially hydrogenated oils.</p>	State

Comparison of Smart Snacks and Connecticut Nutrition Standards, continued

SECTION 2 – NUTRITION STANDARDS, continued			
Criteria	USDA Smart Snacks	CNS	Stricter?
S15 Sugars	<p>Acceptable food items must have ≤ 35% of weight from total sugar as served.</p> <p>Exemptions:</p> <ul style="list-style-type: none"> • Dried whole fruits or vegetables; dried whole fruit or vegetable pieces; and dehydrated fruits or vegetables with no added nutritive sweeteners are exempt from the sugar standard. • Dried whole fruits, or pieces, with nutritive sweeteners that are required for processing and/or palatability purposes (i.e., cranberries, tart cherries, or blueberries) are exempt from the sugar standard. • Products consisting of only exempt dried fruit with nuts and/or seeds with no added nutritive sweeteners or fats are exempt from the sugar standard. <p>Entree Exemptions: Entree items served as an NSLP or SBP entrees are exempt from all competitive food standards if they are sold a la carte on the day of or day after service in the program meal (see S9 in this section).</p>	<p>All foods except yogurt, pudding, smoothies, fruits and vegetables and non-entree combination foods: No more than 35 percent of total sugars by weight and 15 grams of total sugars as served, including any added accompaniments. No artificial sweeteners, nonnutritive sweeteners, or sugar alcohols.</p> <ul style="list-style-type: none"> • Smoothies: No more than 4 grams of total sugars per ounce for smoothies made with low-fat yogurt and/or other low-fat dairy alternatives and/or fruit and/or 100 percent juice. No artificial sweeteners, nonnutritive sweeteners, or sugar alcohols. Portion size is limited to no more than 8 fluid ounces for elementary schools and 12 fluid ounces for middle and high schools. • Yogurt and Pudding: No more than 4 grams of total sugars per ounce. No artificial sweeteners, nonnutritive sweeteners, or sugar alcohols. • Fruits and Vegetables: No more than 35 percent of total sugars by weight as served, including any added accompaniments. No artificial sweeteners, nonnutritive sweeteners, or sugar alcohols. • Non-entree Combination Foods: No more than 35 percent of total sugars by weight as served, including any added accompaniments. No artificial sweeteners, nonnutritive sweeteners, or sugar alcohols. <p>Exemptions: The following foods are exempt from the standard for sugars:</p> <ul style="list-style-type: none"> • Dried whole fruits or vegetables, dried whole fruit or vegetable pieces and dehydrated fruits or vegetables, all without added sweeteners (including artificial sweeteners, nonnutritive sweeteners, and sugar alcohols) or fats (including chemically altered fat substitutes). • Products consisting of only dried fruit with nuts and/or seeds with no added sweeteners (including artificial sweeteners, nonnutritive sweeteners, and sugar alcohols) or fats (including chemically altered fat substitutes). • Frozen desserts containing only 100 percent juice or fruit and no added sweeteners including artificial sweeteners, nonnutritive sweeteners, and sugar alcohols. <p>All other products are not exempt and must meet all nutrient standards.</p> <p>Entree Exemptions: Entrees that are sold a la carte on the same day that they are sold as part of reimbursable meals are exempt from all nutrient standards if they meet the entree exemption criteria (see S9 in this section).</p>	State

Comparison of Smart Snacks and Connecticut Nutrition Standards, continued

SECTION 2 – NUTRITION STANDARDS, continued			
Criteria	USDA Smart Snacks	CNS	Stricter?
S16 Sodium	<p>Snack items and side dishes sold a la carte: No more than 200 milligrams of sodium per item as served, including any added accompaniments.</p> <p>Entree items sold a la carte: No more than 480 milligrams of sodium per item as served, including any added accompaniments.</p> <p>Entree Exemptions: Entree items served as an NSLP or SBP entrees are exempt from all competitive food standards if they are sold a la carte on the day of or day after service in the program meal (see S9 in this section).</p>	<p>All foods except entrees: No more than 200 milligrams of sodium per item as served, including any added accompaniments.</p> <p>Entree items sold a la carte: No more than 480 milligrams of sodium per item as served, including any added accompaniments.</p> <p>Entree Exemptions: Entrees that are sold a la carte on the same day that they are sold as part of reimbursable meals are exempt from all nutrient standards if they meet the exemption criteria (see S9 in this section).</p>	Same
S17 Calories	<p>Snack items and side dishes sold a la carte: No more than 200 calories per item as served, including any added accompaniments such as butter, cream cheese, and salad dressing.</p> <p>Entree items sold a la carte: No more than 350 calories per item as served, including any added accompaniments.</p> <p>Entree Exemptions: Entree items served as an NSLP or SBP entrees are exempt from all competitive food standards if they are sold a la carte on the day of or day after service in the program meal (see S9 in this section).</p>	<p>All foods except entrees: No more than 200 calories as served, including any added accompaniments.</p> <p>Entree items sold a la carte: No more than 350 calories as served, including any added accompaniments.</p> <p>Entree Exemptions: Entrees that are sold a la carte on the same day that they are sold as part of reimbursable meals are exempt from all nutrient standards if they meet the exemption criteria (see S9 in this section).</p>	Same
S18 Accompaniments	<p>Use of accompaniments is limited when competitive food is sold to students in school. The accompaniment must be included in the nutrient profile as part of the food item served and meet all proposed standards.</p>	<p>All accompaniments (e.g., condiments) must be included in the nutrient profile as part of the food item served and meet all nutrient standards.</p>	Same

Comparison of Smart Snacks and Connecticut Nutrition Standards, continued

SECTION 2 – NUTRITION STANDARDS, continued			
Criteria	USDA Smart Snacks	CNS	Stricter?
S19 Caffeine	<p>Elementary and Middle School: Foods and beverages must be caffeine-free with the exception of trace amounts of naturally occurring caffeine substances.</p> <p>High School: Foods and beverages may contain caffeine.</p>	<p>No caffeine for all grade levels, with the exception of trace amounts of naturally occurring caffeine-related substances. Foods and beverages with trace amounts of naturally occurring caffeine and related substances (such as chocolate chip cookies and coffee yogurt) are allowed if the product otherwise complies with the CNS.</p> <p>Note: C.G.S. Section 10-221q prohibits any caffeinated beverages in public schools and therefore supersedes the caffeine standard under the final rule (see S24 in section 3).</p>	State
S20 Nonnutritive Sweeteners	None	<p>No artificial sweeteners, nonnutritive sweeteners, or sugar alcohols.</p> <p>The CNS advocates whole or minimally processed foods that are naturally nutrient rich and low in added sugars. Therefore, the CNS does not allow reducing sugars through the use of any nonnutritive sweeteners (artificial or natural) or sugar alcohols. For more information on the state nutrition standards committee’s rationale for this standard, see the CSDE’s <i>Connecticut Nutrition Standards for Foods in Schools</i>.</p>	State
S21 Chemically altered fat substitutes	None	<p>No chemically altered fat substitutes.</p> <p>The CNS advocates whole or minimally processed foods that are naturally nutrient rich and low in fat. Therefore, the CNS does not allow reducing fat with chemically altered fat substitutes such as Olestra, Olean, and Simplese. For more information on the state nutrition standards committee’s rationale for this standard, see the CSDE’s <i>Connecticut Nutrition Standards for Foods in Schools</i>.</p>	State

Comparison of Smart Snacks and Connecticut Nutrition Standards, continued

SECTION 2 – NUTRITION STANDARDS, continued			
Criteria	USDA Smart Snacks	CNS	Stricter?
S22 Fortification	None	<p>No significantly fortified products except for naturally nutrient-rich foods fortified with nutrients at levels based on scientifically documented health needs.</p> <p>The CNS promotes the consumption of needed nutrients through naturally nutrient-rich healthy food choices, not through fortified products that would otherwise have little nutritional value. The CSDE does not approve any significantly fortified products for use in schools unless they are already nutrient-rich products that are fortified with nutrients at levels based on scientifically documented health needs, such as milk fortified with vitamins A and D, breakfast cereals fortified with iron, orange juice fortified with calcium, soy beverages fortified with calcium, and grain products fortified with folic acid. For more information on the state nutrition standards committee’s rationale for this standard, see the CSDE’s <i>Connecticut Nutrition Standards for Foods in Schools</i>.</p>	State
S23 Supplementation	None	<p>No nutrition supplements, e.g., amino acids, extracts and herbs or other botanicals.</p> <p>The CSDE does not approve beverage or food products containing nutrition supplements such as amino acids (e.g., taurine, glutamine, lysine and arginine), extracts (e.g., green tea extract and gotu kola extract) and herbs or other botanicals (e.g., ginseng and ginkgo biloba). For more information on the state nutrition standards committee’s rationale for this standard, see the CSDE’s <i>Connecticut Nutrition Standards for Foods in Schools</i>.</p>	State

Comparison of Smart Snacks and Connecticut Nutrition Standards, continued

SECTION 3 – BEVERAGES

Criteria	USDA Smart Snacks	CNS	Stricter?
<p>S24 Beverages</p>	<p>Elementary School</p> <ul style="list-style-type: none"> • Plain water or plain carbonated water (no size limit); • Low-fat (1%) milk, unflavored (≤8 fl oz); • Nonfat milk, flavored or unflavored (≤8 fl oz), including nutritionally equivalent milk alternatives as permitted by the school meal requirements; • 100% fruit/vegetable juice (≤8 fl oz); and • 100% fruit/vegetable juice diluted with water (with or without carbonation) and no added sweeteners (≤8 fl oz). <p>Middle School</p> <ul style="list-style-type: none"> • Plain water or plain carbonated water (no size limit); • Low-fat (1%) milk, unflavored (≤12 fl oz); • Nonfat milk, flavored or unflavored (≤12 fl oz), including nutritionally equivalent milk alternatives as permitted by the school meal requirements; • 100% fruit/vegetable juice (≤12 fl oz); and • 100% fruit/vegetable juice diluted with water (with or without carbonation) and no added sweeteners (≤12 fl oz). <p>High School</p> <ul style="list-style-type: none"> • Plain water or plain carbonated water (no size limit); • Low-fat (1%) milk, unflavored (≤12 fl oz); • Nonfat milk, flavored or unflavored (≤12 fl oz), including nutritionally equivalent milk alternatives as permitted by the school meal requirements; • 100% fruit/vegetable juice (≤12 fl oz); • 100% fruit/vegetable juice diluted with water (with or without carbonation) and no added sweeteners (≤12 fl oz); • Other flavored and/or carbonated beverages (≤20 fl oz) that are labeled to contain ≤5 calories per 8 fl oz, or ≤10 calories per 20 fl oz; and • Other flavored and/or carbonated beverages (≤12 fl oz) that are labeled to contain ≤40 calories per 8 fl oz or ≤60 calories per 12 fl oz. 	<p>The requirements for beverages are separate from the CNS and are legislated through C.G.S. Section 10-221q. The state statute allows five categories of beverages.</p> <ol style="list-style-type: none"> 1. <i>Milk (flavored or plain)</i> with no more than 4 grams of sugar per ounce and no artificial sweeteners; 2. <i>Nondairy milks such as soy or rice milk</i>, which may be flavored but contain no artificial sweeteners, no more than 4 grams of sugar per ounce, no more than 35 percent of calories from fat per portion and no more than 10 percent of calories from saturated fat per portion; 3. <i>100 percent fruit juice, vegetable juice or combination of such juices</i>, containing no added sugars, sweeteners or artificial sweeteners; 4. <i>Beverages that contain only water and fruit or vegetable juice</i>, and have no added sugars, sweeteners or artificial sweeteners (these beverages must also meet the requirements specified in Requirements for Beverages Containing Water and Juice); and 5. <i>Water</i>, which may be flavored but contains no added sugars, sweeteners, artificial sweeteners or caffeine. <p>Portion sizes of allowable beverages are limited to no more than 12 ounces, with the exception of water.</p> <p>The state beverage requirements apply at all times, not just during the school day. C.G.S. Section 10-221q requires that averages that do not meet the requirements of state statute can only be sold to students on school premises if the local board of education or school governing authority votes to allow exemptions 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 beverages are not sold from a vending machine or school store.</p> <p>For the definition of “school day,” see D7 in section 1. An “event” is an occurrence that involves more than just a regularly scheduled practice, meeting or extracurricular activity, e.g., soccer games, school plays, and school debates are events but soccer practices, play rehearsals, and debate team meetings are not. “Location” means where the event is being held. For example, lemonade could be sold on the side of the soccer field during a soccer game, but cannot be sold in the school cafeteria while a game is played on the soccer field.</p>	<p>*</p>

* The USDA Smart Snacks requirements are stricter in some areas and the state beverage requirements are stricter in others.

Comparison of Smart Snacks and Connecticut Nutrition Standards, continued

SECTION 3 – BEVERAGES, continued

Criteria	USDA Smart Snacks	CNS	Stricter?
<p>S24 Beverages, continued</p>	<p>Additional State Requirements for Public Schools</p> <p>Beverages sold to students in public schools must meet the additional requirements of C.G.S. Section 10-221q below.</p> <ul style="list-style-type: none"> • Water must contain no added sugars, sweeteners, artificial sweeteners or caffeine. Consult the CSDE’s List of Acceptable Foods and Beverages for allowable products. • Milk must contain no more than 4 grams of sugar per ounce and no artificial sweeteners. Consult the CSDE’s List of Acceptable Foods and Beverages for allowable products. • Nondairy milk alternatives must contain no artificial sweeteners, no more than 4 grams of sugar per ounce, no more than 35 percent of calories from fat per portion and no more than 10 percent of calories from saturated fat per portion. Consult the CSDE’s List of Acceptable Foods and Beverages for allowable products. For more information on allowable nutritionally equivalent milk alternatives, see the CSDE’s handout, Allowable Milk Substitutions for Nondisabled Children. • 100% juice must contain no added sugars, sweeteners or artificial sweeteners. Consult the CSDE’s List of Acceptable Foods and Beverages for allowable products. • 100% juice diluted with water must contain no added sugars, sweeteners or artificial sweeteners, and must also meet the requirements specified in the CSDE’s handout, Requirements for Beverages Containing Water and Juice. Consult the CSDE’s List of Acceptable Foods and Beverages for allowable products. • Other flavored and/or carbonated beverages that do not meet the requirements of Section 10-221q are prohibited for sale to students, e.g., diet soda, sports drinks and caffeinated beverages. <p>For more information, see the CSDE’s handout, Summary of Smart Snacks Nutrition Standards.</p>	<p>Note: Some state beverage requirements are different from the USDA beverage requirements under the interim final rule. Schools must follow whichever requirements are stricter. In addition to the federal requirements, all public schools must meet the additional requirements of C.G.S. Section 10-221q (see “Additional State Requirements for Public Schools” in the column on the left).</p> <p>The following CSDE resources on the Beverage Requirements Web page provide more information on the beverage requirements:</p> <ul style="list-style-type: none"> • Allowable Beverages in Connecticut Public Schools • Beverage Requirements for Connecticut Public Schools (PowerPoint) • Guide to Competitive Foods in Schools 	<p>*</p>

* The USDA Smart Snacks requirements are stricter in some areas and the state beverage requirements are stricter in others.