

Nutrition Standards for Competitive Foods
Frequently Asked Questions
Revised September 2008

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July 2008 Updates

1. What changes were made when the standards were updated July 2008?

The paragraph that limited the number of a la carte items students could purchase was eliminated. There are no longer any limits to the number of items that students (in any grade) can purchase a la carte. Please note that because there are no longer limits to the number of items students can purchase, it is especially important to offer and promote healthier items.

Some sections of the standards were re-worded to make them easier to understand, but there were no additional changes to the content, other than the change described in the paragraph above.

A La Carte Foods

Any food or beverage sold in the cafeteria separately from a reimbursable meal is considered a la carte. This includes snack items as well as meal items such as pizza, chicken nuggets, etc. that are sold separately from the meal.

Single Serving:

2. What is a single serving for a la carte foods?

If the a la carte item is also sold as part of a reimbursable meal, the serving size will not exceed the serving size sold for the reimbursable meal.

If the food is not part of a reimbursable meal, use the serving size listed on the food label. The label should list the number of servings per package and the size of the serving.

For school-prepared foods that are not part of the reimbursable meal, such as cookies: If the food is prepared based on a USDA recipe, use the serving size on the recipe. If the food is not prepared based on a USDA recipe, use the serving size in the USDA Food Buying Guide.

3. Must a la carte items be individually wrapped to be considered single serving size or may they be “plated”?

Items do not need to be individually wrapped. They may be plated as long as the serving size on the plate meets the definition of single serving size, listed in the question above.

Exempt Reimbursable Meal Components:

4. Reimbursable meal components that are also sold a la carte are exempt from some of the a la carte standards. Can entrees that are not on the official lunch menu be considered reimbursable meal components and be exempt from these standards if they can be made into a reimbursable meal? (For example, pizza and sandwiches that are sold in a food court)

A la carte entrees may be exempt from these standards **only if** the school advertises how to make a reimbursable meal with them. Many schools advertise by placing signs near the entrees that promote making a meal by adding a milk and fruit/vegetable.

Fried Foods:

5. What is meant by pre-fried or flash fried foods? How can I tell if an item is pre-fried?

This refers to items that the food service department purchases that have already been fried (cooked by total immersion in hot oil or other fat) such as chicken patties, french fries, etc. Generally, these items are breaded and/or partially cooked already. This does not include sautéed or stir-fried foods.

You can read the label or contact the manufacturer to find out if an item is pre-fried.

6. May we still serve fried foods, such as french fries, as part of the reimbursable meals?

Ideally, we would prefer that you limit fried foods in your reimbursable meal. However, the Nutrition Standards for Competitive Foods in Pennsylvania Schools do not apply to the reimbursable meal. Reimbursable meals must follow federal school lunch and breakfast guidelines which currently do not limit deep fried, flash fried or pre-fried foods.

7. May deep fried, pre-fried and flash fried foods be sold a la carte?

On site deep fried food may not be sold a la carte, even if they are also part of the reimbursable meal. Pre-fried or flash fried foods cannot be offered a la carte more than three times per week, even if they are also sold as part of the reimbursable meal.

8. A La Carte Standards state that pre-fried or flash fried foods will not be offered more than three times per week.

- **Can we offer more than one fried food on those days?**

Yes, but if you offer two items in one day, then it counts as two times.

- **Do the limits apply separately to breakfast and lunch?**

Yes, the limits apply separately to breakfast and lunch. So, pre-fried or flash fried foods can be offered a la carte up to three times per week at each meal.

- **If a pre-fried or flash fried food is offered as an optional topping or side dish, where children have a choice of other items to take instead, does this still count toward the limit? For example, if chicken nuggets are offered as a topping for a salad bar or if potato puffs are offered as an optional side dish, does this count?**

Yes, each day you put them out as an a la carte choice is considered one time. We recommend checking with your vendor to look for baked alternatives.

9. We currently offer pre-fried foods every day in our food court. These foods can be part of a reimbursable meal, but are also sold a la carte. How can we comply with the fried food limits?

One option would be to decrease the number of days you serve pre-fried foods in your food court, so it will not be a problem to offer them a la carte. Another option might be to pick 2 - 3 days where fried foods cannot be sold a la carte. If a student wants fried foods on those days, they must be purchased as part of a reimbursable meal.

Fruits and Vegetables:

10. The a la carte standards say that 3 fruits and 3 vegetables must be offered anytime a la carte food is offered.

- **If the only a la carte we sell is “leftovers of the reimbursable meal”, do we still need to offer 3 fruits and 3 vegetables?**

If your only a la carte is leftovers of the reimbursable meal that you are selling to prevent waste, you do not need to offer 3 fruits and 3 vegetables. However, we do encourage you to offer a choice of fruits and vegetables (especially fresh) to encourage fruit and vegetable consumption.

- **If our only a la carte is extra fruit, vegetables, or salads, do we still need to offer 3 fruits and 3 vegetables.**

No, you do not need to offer 3 fruits and 3 vegetables if fruits and vegetables are your only a la carte choice.

- **Do we need to offer 3 fruits and 3 vegetables at breakfast, if a la carte foods are sold at breakfast?**

You must offer 3 fruits, but you do not need to offer vegetables at breakfast.

- **Can 100% fruit or vegetable juice or 100% juice bar count as one of the a la carte fruits or vegetables?**

Whole fruits and vegetables are preferred. 100% fruit juice or 100% juice bar can replace one, but not more, of the fruits. 100% vegetable juice can replace one, but not more, of the vegetables.

- **Can fried vegetables, such as French fries count as one of the 3 required a la carte vegetables?**

We prefer that all 3 vegetables not be fried. However, French fries can count toward the vegetable requirement as long as they are not on site deep fried.

- **Does each fruit and vegetable on a salad bar count as one of the a la carte fruits and vegetables?**

The salad bar counts as one vegetable. If the salad bar has fruit, it can also count as one fruit.

- **If the school serves sandwiches a la carte, do the lettuce and tomato (onion, green pepper, etc.) count as part of the a la carte fresh vegetable requirement?**

The “condiments” count as one vegetable.

11. How can we offer 3 fruits and 3 vegetables (at least one of each being raw) on a limited budget? We are concerned about the fruits and vegetables going bad before they are sold.

You may offer the same fresh fruit and/or vegetable for a few days in a row so that you are better able to sell it before it spoils. Schools report that salads and other fresh vegetables (often broccoli, carrots, cherry tomatoes) and dip sell well. Some ideas for marketing fresh fruits and vegetables include:

- Offer free taste tests of various vegetables, and then promote the popular ones.

- Use color and placement to attract attention. For example, yellow bananas on bright purple paper.
- Price the fruits and vegetables slightly lower, and raise the price of “junk food items” to compensate.
- Fruits and vegetables that are locally grown and/or “in season” tend to be less expensive. A list of seasonal produce items can be found at: www.thefoodtrust.org/pdf/seasonality%20chart.pdf.
- Market fruits and vegetables as a “value meal” with sandwiches or other popular items.
- Market your fresh produce to teachers for the classroom parties, because fresh fruits and vegetables are required at classroom parties.

For additional information on marketing, go to: www.meals4kids.org/marketing_toolkit/mtk.pdf.

A list of tips on fresh fruits and vegetables for food service directors can be found on PDE’s website at www.pde.state.pa.us/food_nutrition. Follow the link to the School Nutrition Incentive.

Whole Grains:

12. How can we offer whole grains on a limited budget?

The a la carte standards say that 50% grains must be whole grains. This includes snack items and meal items that are sold a la carte. Whole grain buns and breads tend to be more expensive than comparable products made with white flour. Check the price of whole grain snack foods like popcorn, whole grain granola bars, whole grain crackers, and whole grain pretzels. The prices of whole grain snacks may be comparable to snacks that are not whole grain.

Schools can determine the prices they charge for a la carte items. Since PDE’s Nutrition Standards require that foods be priced to encourage the sale of healthier items, increase the price of some popular less healthy foods to help make up for the extra cost of the whole grains.

13. We tried whole grains, but the children won’t eat them. How do we get children to eat them?

Here are some tips from schools that have been successful at offering whole grains:

- Whole grain pizza works well. The children may not even notice the whole grain, especially if the pizza looks like the kind they buy in pizza parlors or restaurants.
- Try whole grain pasta covered with sauce or as part of a pasta salad. Certain brands of whole grain pasta may be accepted better than others.
- Try grilled cheese with one slice whole wheat bread face down and one slice white bread face up.
- Children like the whole wheat sugar cookies made from the NutriKids recipe when it is modified to be made with ½ white and ½ whole wheat flour (rather than all whole wheat flour), and a little extra milk.
- Whole grain “white” may be better accepted than the darker whole grains.
- Tell students and families about your switch to whole grains. Promote it in a positive manner.
- It may take some time for children to get used to whole grains, but they will eat them in time.

14. Where can we find ideas for whole grain foods and snacks?

The Whole Grain Council website: <http://www.wholegrainscouncil.org/> and USDA Dietary Guidelines Fact Sheet on Whole Grains http://www.fns.usda.gov/tn/Resources/DGfactsheet_grains.pdf have ideas. Please check the food label to make sure foods listed on the websites meet PDE Nutrition Standard criteria.

Fat and Sugar Criteria:

- 15. The standards exempt nuts, seeds, nut butters and reduced fat cheeses from the total fat limits. They also exclude naturally occurring sugars and lowfat yogurts from the sugar limits. Can “mixed products” such as trail mix and peanut butter crackers be excluded from these standards because they contain some nut component and/or naturally occurring sugars? Trail mix may contain both naturally occurring and added sugars and you cannot differentiate between the two on the label.**

Trail mix can be exempt from the fat and added sugar limits as long as added sugar (see Table 3 of the nutrition standards) is not the first ingredient and your visual inspection indicates that the bulk of the trail mix is nuts and/or dried fruits. It can contain a small amount of chocolate or crackers, but the bulk of the trail mix must be nuts, seeds or fruits.

Peanut-butter crackers cannot be exempt from the fat limits because they generally contain only small amounts of peanut butter and significant amounts of fat from the crackers.

Vending

- 16. What if our school is in a public building and vending is out of our control?**

If possible, turn off the machine or unplug it during school hours. If this is not possible, students should be prohibited from accessing the machine during school hours. If vending is not accessible during the school day, the school is exceeding PDE vending standards.

- 17. Can we sell vending foods or beverages that do not meet PDE standards after school hours?**

The Nutrition Standards only apply to foods that are available during the school day, so selling foods or beverages that do not meet PDE standards after school hours is allowable. However, we encourage you to sell healthier foods and beverages and reasonable portion sizes at all times.

- 18. If we sell a la carte items through a vending machine, are they considered a la carte or vending?**

If the food or beverage comes out of a vending machine, it is considered vending.

- 19. Does each vending machine have to meet all of the vending machine standards?**

Yes, each vending machine must comply with all of the standards.

- 20. If we do not have refrigerated vending, how can we comply with the requirement that fruits and vegetables will be available in at least one food vending area, and in all vending areas where refrigerated vending is available?**

You can have dried fruits, canned fruits that do not require refrigeration, or a fruit and vegetable stand near the vending machine. Or you can turn the food vending off during the day, so you won't have to comply with vending standards.

- 21. If a school only has beverage vending (no food vending), do they still need to comply with the above fruit and vegetable requirement?**

No, because the fruit and vegetable requirement applies to food vending and is only applicable if food vending is available.

Beverages (A La Carte, Vending, and School Store)

22. What does “a minimum of 75% of beverages” mean?

“A minimum of 75% of beverages” refers to 75% of the beverage choices available to students. Each type or flavor is considered a choice. For example: If the school offers 1% chocolate milk, 1% plain milk, 2% plain milk, and lemon iced tea, then 75% of beverage choices are milk.

As a possible alternative, “a minimum of 75% of beverages” can refer to 75% of the shelves, sleeves or vending machines slots. For example: If three shelves, sleeves or slots are plain water, and one is Gatorade, then 75% of the beverage choices are plain water.

23. Is there a size limit for the “other 25% beverages” such as teas and sports drinks as long as they do not contain more than 150 calories and 35 grams of sugar per package?

There is no size limit for the “other 25% beverages” as long as they don’t exceed 150 calories and 35 grams of sugar per package. Please note that this is per package (container), not per serving.

Beverages that are sweetened with sugars may meet this standard in smaller sizes, but not in the larger sizes. (As the size increases, the sugar and calories per container will increase and may exceed our limits). You will have to check each container.

Artificially sweetened beverages will probably meet this standard regardless of size because they generally contain minimal calories and sugar. However, we suggest that you still limit the size and number of artificially sweetened beverages because the long term effects of artificial sweeteners on children are not known (1).

24. Beverages in the “other 25% beverages” category may be sold first. Can we restock them?

It is up to your school whether or not to restock. You should encourage the sale of the “healthier beverages”. Some suggestions include:

Make sure the healthy beverages are marketed just as well (location, attractiveness, etc.) as the beverages you are trying to limit. For example, sell milk in re-closable plastic bottles rather than cartons. Sell juice in bottles rather than squat plastic cups.

Lower the price of “healthier beverages” and increase the price of less healthy beverages.

25. The standards allow carbonated beverages with a minimum of 70% pure juice and no other added ingredients except water. Can these beverages contain ingredients such as Vitamin C (ascorbic acid), citric acid, and malic acid that are often found in 100% juice?

Yes, these beverages may contain natural ingredients that are in 100% juice such as natural flavors and colors, Vitamin C (ascorbic acid), citric acid, malic acid, but no added sugars, sweeteners, or herbs. Please remember that these carbonated beverages are only allowed if they are exempted by USDA from being a Food of Minimal Nutritional Value (FMNV). See question 50 for more information on FMNV.

26. How do the nutrition standards accommodate lactose-intolerant students' milk needs?

Lactose-free and lactose reduced milk (milks with the lactose sugar removed or reduced) fit into the milk category of the standards. These milks should be available from most dairies. Soy and rice beverages (often called soy milk and rice milk) are not classified as milk so they fit into the “other 25% category” of the standards.

27. Please explain the standards for water that can be offered a la carte.

All grades may have any size plain water or flavored water that does not have sugar or artificial sweeteners. Middle and high school students (but not elementary) may also have 17 oz. or less size containers of flavored water that contains artificial sweeteners. Artificially sweetened flavored water may not exceed 25% of water and 100% juice selections

28. Will a 100% Juice Slush be considered a beverage even though it is frozen?

If the product contains only 100% juice that is frozen, it is considered 100% juice. Check the label or CN labeling to be sure it is labeled "100% juice."

29. Can we provide 16 ounce milk for high school? Twelve ounce size is not readily available. Also, why are we discouraging milk when most children don't get enough?

75% milk selections must be 2% fat or less, 12 oz. size or less; and 30 grams or less sugar per 8 oz. You can offer 16 oz. milk as part of the other 25% of milk selections.

We are aware that 12 oz. containers are not readily available at this time in some locations. Please notify vendors that you are interested in this size milk and continue to check for availability. In the meanwhile, 8 oz. and 10 oz. containers are widely available.

PDE is not discouraging milk consumption. However, it is important to demonstrate proper portions. Drinking 16 oz of milk at a meal may prevent eating other foods needed for a balanced meal.

30. Can we sell beverages that contain caffeine?

Although the nutrition standards do not specifically address caffeine, we encourage schools to avoid selling beverages that contain caffeine, especially in the younger grades. Too much caffeine can cause jitteriness and nervousness, upset stomach, headaches, difficulty concentrating, difficulty sleeping, increased heart rate, and increased blood pressure. Caffeine can aggravate heart problems or nervous disorders, and some children may not be aware that they're at risk. In addition, caffeine is a diuretic that causes the body to eliminate water through urinating, which may contribute to dehydration, especially in hot weather (2).

Caffeine is found in coffee, tea, and many types of sodas (pop). It is also added to other beverages such as "energy drinks." Some energy drinks can be very dangerous for children. Check product labels carefully and ask the manufacturer whether there is caffeine (or caffeine like compounds such as guarana) in the products you are considering selling. Please note that chocolate milk only contains a small amount of caffeine and contains valuable nutrients that children need.

31. Are beverages with added vitamins and minerals a good choice?

Many beverages now contain added vitamins and minerals. Small amounts of vitamins and minerals added to products may help children meet their daily needs. However, products that are labeled as "supplements" and/or contain greater than 100% of the Daily Value of certain nutrients may increase the risk that children will exceed safe levels. (Note: 120% DV of Vitamin C found in juices is fine.) Contact PDE if you have questions about nutrient levels in products.

32. Can we offer carbonated beverages?

Carbonated beverages are considered Foods of Minimal Nutritional Value (FMNV) unless they receive an exemption from USDA. (See list of exemptions on PEARS Forms Download, "Guidance-NSLP Section".) FMNV can't be offered on school grounds during the school day.

If a carbonated beverage received a USDA Exemption from Foods of Minimal Nutritional Value, then it can be sold if it fits into the other standards.

33. Where do beverages such as Vitamin Water and Propel Fitness Water fit into the standards? Are they considered flavored waters or "other beverages?"

Check the label. If the water contains added sugar (see Table 3 of Nutrition Standards) as an ingredient and/or the product name indicates that it is enhanced with vitamins, nutrients or anything other than "flavored water," then it falls into the category of "other beverages."

Vitamin Water usually contains fructose (added sugar) and the name indicates it is enhanced with vitamins, so it falls into the "other beverage category." Propel Fitness Water "Vitamin Enhanced Water Beverage" contains sucrose (added sugar) and the product name indicates it is "Vitamin Enhanced" so it also falls under the "other beverage" category. Be sure to check the label of each product because flavors vary and products are subject to change.

34. Can sports drinks or iced tea be offered in vending?

These beverages cannot be offered in vending for elementary. In middle and high school, 25% of vending beverage selections can be beverages other than water, milk, 100% juice and carbonated beverages with at least 70% juice and no other added ingredients except water. Schools can offer beverages such as sports drinks and iced tea as part of the 25% other vending beverage selections, as long as the products do not exceed 150 calories and 35 grams of sugar per container.

Fundraisers

35. Do the fundraising standards apply to foods sold outside the school day? Our students receive the fundraising information during the school day, but the foods are sold and distributed outside of school hours.

The standards for fundraisers only apply to foods sold and consumed during the school day. So, if your students will be selling and distributing items outside the school day, our standards don't apply. However, we recommend that you try to use healthier foods or non-food items for fundraisers, even outside the school day so that you send a consistent message that healthy eating is important.

Here are some flyers for ideas:

<http://www.kidseatwell.org/flyers/twentywaystoraisefunds.pdf>

<http://www.fwps.org/dept/nutrition/fundraiser.pdf>

<http://www.actionforhealthykids.org/filelib/resources/fundraisingtips.pdf>

36. Can we hold food auctions for charity?

Yes, but if the food is for consumption during the school day, it must comply with standards for fundraisers. We encourage the sale of "healthier" food or non-food items even if the fundraiser is held after the school day. See websites listed in the previous question for ideas. As with all events

that involve food, please keep food stored at proper temperatures and avoid home made and other items that may increase the risk of food safety and allergy concerns.

37. May we still hold fundraising bake sales?

Fundraising bake sales held on school grounds during the school day must comply with the nutrition standards for fundraisers. Many items generally sold at bake sales (cakes, cupcakes, pies, etc.) do not meet the standards that limit fat and sugar. In addition, because the items are homemade, it is difficult to determine whether they meet some of the standards (e.g., sugar not the first ingredient, <35% sugar by weight, <35% calories from fat). There also may be an increased food safety risk with home baked goods. For children with allergies, potential allergens would not be labeled.

Fundraising foods can be available no earlier than thirty minutes after the last meal period of the day. This means that fundraising bake sales cannot be held until after the last lunch period of the day, even if they meet the other fundraiser standards.

38. Are schools allowed to sell fundraisers, such as donuts, before the start of the school day?

PDE standards do not restrict foods sold before or after the school day. However, the school can, and is encouraged to limit or eliminate the sale of foods that compete with school breakfast, especially if they are unhealthy.

39. If our PTA sells snacks in the cafeteria during lunch, does it count as a la carte or fundraiser?

It counts as a fundraiser since proceeds go to PTA rather than food service. Food sold as fundraisers before or during the meal may compete with the reimbursable meal. Students are not allowed to purchase food from fundraisers until 30 minutes after the last meal period.

Classroom Parties/ Holiday Celebrations

40. If we provide all required items at planned parties, but a parent brings in cupcakes on another day, what should we do? We would not want to send the parent away with cupcakes that they spent time baking.

Schools should inform parents through newsletters or other means that treats should only be brought in when requested for scheduled parties. We encourage schools to have scheduled parties once per month for all birthdays in the month, rather than every birthday. If a parent still brings in the treats on an unscheduled party day, you should inform the parent of the policy for future reference. We suggest that you provide the parent with a note thanking them for the treats that you will share, but letting the parent know the policy for the future. You may serve the treat, preferably after lunch is served, or at the end of the day for students to take home.

41. How does PDE define "moderate in sodium" under the "Classroom Parties/Holiday Celebrations"?

There is no standard definition for "moderate in sodium". For the purposes of these standards, entrees such as pizza should be less than 600 mg sodium per serving. Snack foods such as pretzels should be less than 480 mg sodium per serving (3). Compare labels to look for foods and snacks that are even lower in sodium. Most snacks should be less than 200 mg sodium per serving (1).

42. Do we need to keep any records of items served at parties (i.e., for the purposes of PDE monitoring)?

No, but you need to have record of how you communicated the policy to families and what your procedure is if a family does not comply.

43. Can birthdays be celebrated on a monthly basis in the cafeteria instead of individual classroom parties?

Yes, with the following stipulations:

- Treats must be available to all students (*Keep in mind students with special dietary needs.*)
- The treat must be provided after the meal (so students are not eating the treat instead of the meal).
- Fruits, vegetables and water, juice or milk must be available (which shouldn't be a problem due to the requirements of the reimbursable meal).

44. Can soda be provided at classroom parties?

No, soda is a Food of Minimal Nutritional Value (FMNV). PDE standards do not allow FMNV to be consumed by students on school grounds during the school day.

45. The classroom party standards require food service to offer party lists/menus that include food and beverage choices that meet certain criteria. Is food service required to actually sell these items, or can they just provide the list to guide choices?

At a minimum, Food Service must provide parents and teachers lists of party items that meet the criteria listed in the Standards. Parents and teachers should be encouraged to buy foods and beverages that are on the list. We would prefer that parents and teachers buy these party items from food service (rather than preparing them themselves) to help prevent food safety and allergy concerns. In addition, this can be an additional source of revenue for school food service. Therefore, we strongly suggest, but do not require, that food service also offer to provide/sell these items to parents and teachers for classroom parties.

School Store

46. If our school store is only open after school, does it have to comply with nutrition standards?

The standards only apply to foods and beverages that are available during the school day. So, if your school store is only open after school, you exceed the nutrition standards for the school stores. Of course, we still encourage you to offer healthier options in the school store, even after the school day.

Rewards

47. Can we provide an occasional pizza party with veggies and fruits as a reward? Is this considered a positive nutrition message?

Food should not be used as a reward for classroom or school activities unless the reward is part of a nutrition education demonstration activity (e.g., guest chef, trip to a farm or farmer's market, etc.).

You can still have a pizza party, but it should be considered a classroom celebration and needs to comply with the PDE standards for classroom parties and celebrations. Also, it should be presented such that the party, rather than the food, is the reward. If possible, activities other than food should take the focus off the food. See the following website for ideas

<http://www.fns.usda.gov/eatsmartplayhardhealthylifestyle/QuickandEasy/celebrations.pdf>

48. Can we participate in a program where students earn pizza coupons for meeting their reading goals? The school issues the coupon, but the pizza is consumed after school.

Yes, your school can still participate since the pizza is consumed after the school day.

Miscellaneous

Foods of Minimal Nutritional Value:

- 49. Does the statement “Foods of Minimal Nutritional Value (FMNV) will not be available any time during the school day” apply to all areas of the school, including parties, even though it is not specifically written in that section?**

Yes, the statement applies to all areas of the school grounds during the school day.

- 50. What are Foods of Minimal Nutritional Value (FMNV)? Where can we find more information?**

There are four categories of Foods of Minimal Nutritional Value (FMNV): Soda Water, Water Ices, Chewing Gum and Certain Candies. These foods are described in more detail in the first link below from the USDA Website. Specific foods in these categories are considered FMNV unless they receive an exemption from USDA. The list of USDA exempted foods is on PEARS Forms Download and the second link below.

www.fns.usda.gov/cnd/menu/fmnm.htm

www.pears.ed.state.pa.us/forms/files/PDE064.pdf

Federal regulations state that FMNV may not be sold in the food service area during the lunch period. PDE Nutrition Standards do not allow FMNV on school grounds during the school day.

- 51. Can we sell a Food of Minimal Nutritional Value (FMNV) if the manufacturer tells us it is exempt?**

Products that are exempt should be on the USDA FMNV Exemption list which is on PEARS Forms Download, Guidance NSLP section. Since the exemption list is only published about once per year, products that have been recently exempted may not be on the list. Schools can consider these products exempt only if the manufacturer provides a letter on USDA letterhead (signed by USDA) that says the product is exempt.

- 52. Can food be used as an instructional tool (e.g., raisins or animal crackers in elementary math class; French pastries for French class: or cakes for home economics class)?**

Yes, food can be used as an instructional tool, but try to use foods that are promoted in the nutrition standards (fruits, vegetables, whole grains, etc.) when appropriate to teach the principle you are trying to teach. If “less healthy” foods are provided (e.g., baking cakes for home economics class), try to only serve small portions and offer healthier foods to accompany them.

- 53. Can we still hold carnivals and “fun days?”**

Yes, carnivals and fun days can still be held. However, if they are held during the school day, they must follow classroom party standards.

Snacks:

- 54. How do morning or afternoon “snacks” fit into the Nutrition Standards?**

Federal law requires that Wellness Policies include standards for all foods available on school grounds during the school day. If a parent brings in food for their child only, standards are not required, but if snacks are supplied (by parent, teacher, school food service, or other person) for the entire class, standards must be developed. PDE Nutrition Standards do not address “snack time,” so

schools that provide snacks on a regular basis must include standards for these snacks in their Wellness Policies. Schools do not need to re-submit their Wellness Policies to PDE to add the standards for snacks, but they can consult PDE for guidance.

PDE recommends that the snack standards encourage whole grains, low fat dairy, and fresh fruits and vegetables, and limit foods high in sugar, salt, and fat. We recommend that Food Service supply snacks due to food safety and allergy considerations. However, if parents will be bringing snacks, they should be provided with a list of foods they can bring in to supply to the class that meet the snack standards. A list of snack suggestions can be found on the PDE website and PEARS Form Download section.

55. If a parent brings in a “healthy food” such as fruit cup, low fat yogurt or string cheese, is it considered a snack or a party treat?

If the food is brought for a daily scheduled eating time, it is considered a snack. The snack must comply with the snack standards that are written in the school’s Wellness Policy (See question 54).

Food that is brought for a classroom party (occasional special event, rather than a daily event) must comply with party standards.

Coffee Houses:

56. Do library “coffee houses” need to comply with nutrition standards?

Yes, library coffee houses that have food or beverages available during the school day must comply with the school store standards. Although the standards do not address caffeine, schools should be aware of the impact of caffeine on students and limit the number and size of caffeinated beverages offered. See question 30 for more information on caffeine.

Monitoring:

57. During a review, who is responsible to prove that standards for competitive foods have been met?

Your Local Wellness Policy (LWP) designates the person(s) responsible for assuring compliance with the policy. The policy may designate someone to accept responsibility for certain areas of the policy (i.e., a superintendent may be responsible for the LWP, but he/she may designate the food service director for specific responsibility of implementing the nutrition standards.)

58. How will compliance with the standards for competitive foods be monitored?

Compliance will be measured as part of the existing Coordinated Review Effort-School Meal Initiative (CRE-SMI) that is periodically conducted by PDE, Division of Food and Nutrition staff.

59. How will PDE address deficiencies? What penalty will be assessed if deficiencies are found? For example, if the food service meets all standards, and then the school has a party or fundraiser that doesn’t meet the standards, will food service be penalized, losing funds?

Schools will be notified of the deficiencies as part of the CRE/SMI review and given ample time to correct the deficiency before monetary penalties are assessed. PDE will discuss the deficiencies with school administration, reminding them of the nutrition standards, as part of the CRE/SMI Review Exit Conference. If the School Nutrition Incentive funds need to be collected due to a deficiency that was beyond the control of food service, the corrective action plan will need to identify how the school will reimburse the food service account.

Student Run Restaurants:

60. A career and technology education school operates a student-run restaurant for the purpose of meeting curriculum/culinary art program requirements. The restaurant is on school grounds and is open to students during the day, including during the lunch time hours.

- **Is the school required to develop nutrition standards for the restaurant?**

Federal Law requires that the wellness policy include nutrition standards for all foods available on the school grounds during the school day. The restaurant should be included in the nutrition standards. The school can decide, at the local level, how restrictive they want to be in the area of culinary arts restaurants. Some suggestions would be to include whole grains as part of the menu, limit how often fried foods are served, emphasize preparation and marketing menu items using fruits and vegetables, price and market healthier foods to encourage patrons to purchase them. At the same time, the school must keep in mind the curriculum requirements they must achieve with the culinary program.

- **Is the restaurant required to follow the PDE nutrition standards in order for the school to be eligible for the additional state reimbursement through the School Nutrition Incentive?**

PDE did not establish specific standards for culinary programs in PDE's Nutrition Standards. Therefore, a student-run restaurant operated by a career and technology education school for the purpose of meeting curriculum/culinary art program requirements does not have to comply with PDE's Nutrition Standards in order to be eligible for the additional reimbursement.

Sales and Profits:

61. Will serving the healthier foods hurt Food Service profits, especially if students have the option to go out to eat?

Some schools have been successful by offering sandwich bars and salad bars similar to restaurants. You can market products that are similar to what the competition is selling, but make it healthier. If applicable, advertise that your prices are cheaper.

Although a la carte sales may go down when healthier food is offered, we often hear that reimbursable meal participation increases.

You can contact PDE if you would like to contact a food service director that has successfully added healthier foods to their menu. For more information on marketing healthy foods, go to: www.meals4kids.org/marketing_toolkit/mtk.pdf.

References

1. Institute of Medicine. Nutrition Standards for Foods in Schools. 2007.
2. Nemours Foundation: Kids Health: Caffeine and Your Child. January 2005.
3. Food and Drug Administration. 21 CFR Part 101. Food Labeling Nutrient Claim Definition of Sodium Levels for the Term "Healthy." September 2005.