



Smart Snacks



ISSUE

How have school food service directors implemented the Smart Snacks provisions resulting from the Healthy, Hunger-Free Kids Act of 2010 (HHFKA)?

BACKGROUND

Prior to HHFKA, the U.S. Department of Agriculture (USDA) had established nutrition standards for school breakfast and school lunch programs. The Federal guidelines for competitive foods (foods that are available outside of school meal programs) limited the sale of foods of minimal nutritional value¹ during meal periods in dining areas. Many States and school districts had developed their own stricter competitive food policies to govern the sale of these foods and beverages inside and outside of the cafeteria.

HHFKA gave USDA the authority to issue nutrition standards for competitive foods sold outside of school meal programs, on school campus, and at any time during the school day in elementary, middle, and high schools that participate in the National School Lunch Program.² Under USDA's new Smart Snacks standards, the allowable food items must be a whole grain-rich product or have fruit, vegetable, dairy, or protein food as the first ingredient; or be a combination food with least ¼ cup fruit and/or vegetable; or contain at least 10 percent of the daily value of any one of four nutrients (calcium, potassium, vitamin D, and dietary fiber). The foods must also meet established calorie and sodium standards for entrée and snack items, have no more than 35 percent of weight from total sugar, contain less than 10 percent of total calories per item from saturated fat, and contain no *trans* fat.

USDA specified foods that were exempt from these requirements; for example, reduced-fat cheese, nuts, seeds, and nut butters may provide more than 10 percent of calo-

ries from saturated fat; and fruits and vegetables, including dried/dehydrated fruits, were exempt from meeting all nutrient standards. In addition to issuing standards for competitive foods, USDA established standards for competitive beverages, requiring schools to serve water, milk, and juice not exceeding maximum serving size specifications by grade level. At the high school level, the standards specified beverage size based on calorie content, and allowed the sale of caffeine beverages.³

“If you have something for sale for children, a lot of times, if they have the money, they’re going to buy something. I don’t know if that’s just a human nature kind of thing.”

This research brief presents an overview of school food service directors’ experiences in transitioning to the Smart Snacks nutrition standards, a summary of the strategies directors have used to overcome challenges and implement the Smart Snacks provisions in their school districts, and recommendations for technical assistance. The information comes from semi-structured discussions conducted by telephone (focus group or individual interview) with nine school food service directors in April and May 2015. Although the participants are not statistically representative of all directors, the qualitative data collection technique was particularly suited to gaining an in depth understanding of how directors implemented HHFKA. See Figure 1 for a summary of the size and poverty level of the school food authorities represented by these directors.⁴

1. Defined as foods that provide less than 5 percent of the Recommended Dietary Allowance for eight key nutrients, as well as carbonated beverages and certain types of candies.

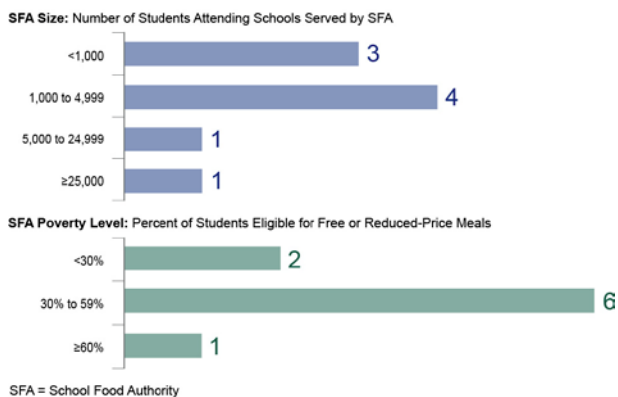
2. U.S. Department of Agriculture, Food and Nutrition Service, Tools for Schools: Focusing on Smart Snacks, <http://www.fns.usda.gov/healthierschoolday/tools-schools-focusing-smart-snacks>.

3. USDA, Food and Nutrition Service, Child Nutrition Division (2014). Interim Final Rule: Nutrition Standards for All Foods Sold in School, <http://www.fns.usda.gov/sites/default/files/SmartSnacks2014.pdf>.

4. This brief also includes strategies cited by directors who participated in focus group discussions and telephone interviews for research briefs in this series on other aspects of HHFKA implementation, including whole grain-rich foods, fruits and vegetables, sodium, plate waste, student participation, food service revenue, and childhood obesity.



Figure 1. Characteristics of School Food Authorities (SFAs) Represented by Participating School Food Service Directors



KEY FINDINGS

Almost all of the school food service directors in this study agreed that transitioning to the new Smart Snacks requirements was not very difficult for them; they were able to find snack foods and beverages that met the requirements, and they did not experience a significant decline in sales of competitive foods and beverages. The directors cited two main challenges in implementing the Smart Snacks provisions: (1) maintaining food service revenue, and (2) obtaining support from school administrators, staff, and parents.

School food service directors described successful strategies that helped them address these challenges, including:

- Research new product options and discuss availability with vendors.
- Involve students in decision making, offer beverage choices, and offer dried fruit snacks.
- Involve school administrators, staff, teachers, and parents in promoting fruits and vegetables as snack options.

Technical assistance in implementing the Smart Snacks provisions should include strategies for obtaining compliant snack foods and beverages, encourage students to move away from buying à la carte items to reimbursable meals, and encourage school personnel and parents to act as role models and promote healthy snack choices.

OVERVIEW OF THE TRANSITION PROCESS

Smart Snacks Policies Prior to HHFKA

All nine school food service directors who participated in this study said competitive food and beverage policies were in place in their districts prior to HHFKA. A few directors said they followed their State policies and did not develop their own, but others said their State provided sample policies that they used to develop their district policies. Two

directors said State policies for competitive foods were not always enforced.

Four school food service directors said they did not offer any competitive foods in their schools, including high schools. These directors said they served districts with a high proportion of low-income children. To ensure that students ate healthier, reimbursable meals, directors said that they implemented a strict ban on sales of competitive foods when school was in session. One director from a high-poverty district said that banning competitive foods was the right thing to do, so students were not tempted to spend money on foods with low nutritional value.

“We personally don’t do vending machines. I know a lot of school systems do, but we’ve never done vending machines, school stores, or anything like that in our district.”

Prior to the Smart Snacks provisions, school food service directors who offered competitive foods did so starting at the secondary school level. The most frequent venue for sales of competitive foods was à la carte lines, followed by vending machines. Directors reported greater à la carte sales at lunch than at breakfast. Directors reported serving muffins, toaster pastries, and breakfast bars during breakfast. At lunch, à la carte items included entrées from the reimbursable school lunch (which is exempt from the Smart Snacks standards the day of and the day after service in the school meal programs), soft pretzels, chips, cookies, ice cream, and beverages. A few directors had a separate line for à la carte items, one director had a separate room for à la carte sales, and one director had a kiosk set up in the middle school to sell à la carte items.

School food service directors said their districts varied in the types of foods sold in vending machines and when students could access them during school. Two directors had a district policy to sell snack products in vending machines that offered no more than 30 percent calories from fat. Some directors said they did not provide students access to vending machines with soda during school. Another director said students could access beverages in vending machines, but sugar-sweetened beverages were limited to 10-ounce containers. Another director said they sold only vitamin water in vending machines.

One school food service director said they allowed only baked products in vending machines. One director said they did not limit access to vending machines, and students could access foods and beverages at any time during the school day. Another director said they had a vending law that applied to grades Kindergarten-8 that prohibited access to vending machines starting 45 minutes before school start time and lasting until 30 minutes after school ended.



One director said that when he required vendors to stock healthy food options in high school vending machines, the vendors pulled out because of a lack of profitability.

“When we made them start putting in healthy options, that was when they decided that they just didn’t want to have their machines in our schools anymore, because they didn’t feel it was profitable.”

Most school food service directors said their schools had just a few fundraisers, and said State policies on selling competitive foods at fundraisers were not enforced in their districts. Three directors said they sold fruits at fundraisers; two others said only nonfood items were sold at fundraisers.

Transitioning to Smart Snacks Provisions

Almost all school food service directors in this study agreed that transitioning to the new requirements was not very difficult for them. Directors did not experience a significant decline in sales of competitive foods and beverages. Directors saw increases in reimbursable meal sales, and attributed their ability to stay cost neutral or generate profit to lower than expected declines in food sales and higher than expected reimbursable meal sales.

“HHFKA had a lot of impact on our regular menu, but as far as the snack program, it hasn’t had a lot of impact.”

School food service directors said they discussed the changes in school snack policies with school administrators. Most directors agreed that the transition to the new standards was facilitated by the fact that the standards took effect at the start of the school year, rather than in the middle of the school year.

“The best thing about these kinds of rules is they usually start July. So, from one school year ending to the next school year beginning, that summer is like a lifetime to students. Believe it or not, we would start the changes the first day of school.”

School food service directors said they did not discuss the changes in snack offerings with students or parents. One director said she intentionally refrained from advertising, as she did not want complaints even before students tried new products.

School food service directors acknowledged that at the beginning of the school year, students were looking for the snacks and beverages they were accustomed to. Directors said they did observe an initial decline in sales of competitive foods, but noted that sales picked up over time.

“We might have a few questions like, ‘Well, where is this?’ and ‘Where is that?’ that they maybe got last year. That wears off pretty quickly, so we didn’t really have a hard time with that.”

All school food service directors said they were able to find snack foods and beverages that met the new Smart Snacks requirements. Although a few directors moved vending machines out of common areas, other directors added additional beverage machines in common areas.

Most school food service directors from districts that held fundraisers during school hours said the Smart Snacks provisions have altered their fundraisers dramatically, and the trend is to get away from selling food items for fundraising. Most directors said that they had moved away from selling food items and now sold nonfood items and water.

“It really helped us hone in on what kids’ needs were, not necessarily what kids’ wants were, and be able to give them a better quality snack than what they’re used to.”

One school food service director discussed ongoing plans to expand snack offerings. Another director said she had focused on shifting away from snack items such as chips and drinks and moving toward offering more hot à la carte items such as pizza, chicken, and other entrées. A few directors said students typically do not consider fruits and vegetables as a snack option. These directors said fruits and salads were offered as à la carte items but were not frequently selected by students. Directors thought that the Fresh Fruit and Vegetable Program (FFVP)⁵ and learning gardens helped expose students to a variety of fruits and vegetables, but suggested that it will take more time to achieve greater student acceptance of fruits and vegetables as snack options.

“The kids don’t see that [fruits and vegetables] as a snack food, and I think that’s probably part of some of the changes we need to make. I’m just not

5. Offered by the USDA Food and Nutrition Service, the FFVP is a snack program intended to expose students to fruits and vegetables outside of the school meal program.



sure how to do that, to introduce them more as a snack item, and not so much a fruit or a vegetable that needs to be part of your lunch.”

STRATEGIES FOR SUCCESS IN IMPLEMENTING SMART SNACKS PROVISIONS

School food service directors who participated in this study cited two main challenges in implementing the Smart Snacks provisions:

1. Maintaining food service revenue (this was not necessarily a challenge for all directors), and
2. Obtaining support from school administrators, teachers, and parents.

Directors described successful strategies that helped them address these challenges, as summarized below.

Challenge 1: Maintaining food service revenue.

✓ **Research new product options and discuss availability with vendors.** School food service directors said they pursued several avenues to learn about new products that would meet the Smart Snacks provisions. Directors said that even before the new standards for competitive foods took effect, vendors and food service companies provided them with a list of snack options that met the guidelines. Directors said food companies started advertising their products as “Smart Snacks approved,” which made it easy to build a list of products.

“A lot of the food companies that I do business with were really good about their Web sites and things. You could go look up just about any product, and it would say, ‘Smart Snacks approved.’ They would send out stuff in the mail, ‘Try this. Try that.’ They were really on top of that. That’s how I did it.”

One school food service director said the dietitian in their district did the research and offered suggestions. Another director said their purchasing department discussed product offerings with the vendors and developed a list of options for the director to consider.

A few school food service directors said they also relied on product recommendations from the School Nutrition Association and their State agency. One director said she started contracting with more vendors to purchase products that were popular with children. A few directors reviewed trade magazines to identify compliant products that would appeal to students.

“I saw a lot of things in there, too, different ads. I would pull things out of [trade] magazines and then I would contact my distributor and say, ‘Hey, do you carry this? It looks good. It meets the guidelines.’”

School food service directors agreed that after identifying products, they verified the products’ compliance by using the Alliance Product Calculator for Smart Snacks.⁶ Directors entered the product information and answered a few questions about the product in the calculator to determine if the product (entrée item, snack, or beverage) meets the new USDA Smart Snacks in School guidelines.

School food service directors took advantage of the wide range of options available and changed snack offerings based on student uptake. This enabled them to maintain revenue from competitive foods.

“[We offered a lot of] products, so that would hopefully ease the negativity of us taking away some of the products the students liked. The idea was to inundate them with all new products, so they would almost be a little distracted from what they used to have.”

One school food service director secured a grant from the National Dairy Council to purchase insulated bags. These allowed the school to store milk, yogurt, and cheese products and to offer these as snack options in the à la carte lines and in after-school programs. Another director leased a frozen yogurt machine and began offering non-fat frozen yogurt in the snack room.

✓ **Engage students in decision making.** Many school food service directors said they involved students in making decisions about what snacks to purchase from vendors. One director said they organized a field trip and took students to trade shows. The brokers set up products they wanted to test with students, and gave each student a booklet listing the products. Students then visited the brokers, tasted the products, and offered feedback on the products. After the field trip, the results were compiled and if a product received a 70-percent or higher approval rating, the snack was added to the list for the next school year. Another director said she worked with teachers to conduct taste tests and get student input.

6. Designed to assess and change foods offered at schools, the calculator can be launched at the Alliance for a Healthier Generation Web site: https://www.healthiergeneration.org/take_action/schools/snacks_and_beverages/smart_snacks/alliance_product_calculator.



“We meet at the school and we have samples. We give them a piece of paper with either a smiley face or an unhappy face and we say, ‘OK, if you like product A,’ you know, ‘circle a happy face.’ We try to keep it very, very simple.”

✓ **Offer a greater variety of beverages.** Several school food service directors said they are offering more beverage choices now than they did prior to HHFKA. The directors achieved this despite removing four to five beverages in middle school and six to seven beverages in high school. They replaced iced tea, lemonade, sports drinks, and hot chocolates with carbonated, fruit-flavored water and energy drinks.

A few directors added smoothies and diet tea sweetened with sucralose. One director said she added another vending machine to sell beverages (primarily carbonated, fruit-flavored water), noting that a vending machine provides a venue to buy beverages without waiting in line in the crowded dining room. All directors who offered flavored waters and diet drinks said students enjoy those beverages and do not miss those that were previously offered.

“I probably now have triple the variety [of beverages] that I used to have, because of all the new products. We sell a lot of flavored, carbonated fruit flavor beverages, all that meet the guidelines. There’s one particular beverage that we sell that we probably have six or seven flavors of, so we have drastically increased the amount of beverages that we have available at the high school level.”

✓ **Offer a variety of dried fruit snacks.** A few school food service directors eliminated several fruit-flavored snacks and replaced them with dried fruit. The directors said students were receptive to these fruit options in vending machines, school stores, and kiosks.

“We used to sell [fruit-flavored snacks]. We no longer sell them. They were a huge seller at the middle school. What we do sell now is, there is a ... fruit snack that’s permitted.”

✓ **Move students toward selecting reimbursable lunch.** Several school food service directors, particularly those from medium- and high-poverty districts, said they

launched efforts to improve school meal participation. This strategy meant de-emphasizing competitive foods as a part of the school food environment.

One school food service director said that when students picked up a few items from reimbursable meals, the line staff and/or cashier encouraged them to select additional items to make it a complete, reimbursable meal. These efforts resulted in increases in participation rates and revenue.

“Expanding meal participation is an especially appealing option for generating revenues to offset any losses from eliminating sales of less-nutritious competitive foods.”

Another school food service director said they had à la carte food sales set up near the lunch lines, and added a salad bar or salad options. When students purchased an entrée, the cashier encouraged the students to pick up the salad and make it a reimbursable meal.

“If they get a piece of pizza that meets the guidelines, but they pick up a salad that’s right there, we could easily turn that into a reimbursable meal, but have it as both options.”

Challenge 2: Obtaining support from school administrators, teachers, and parents.

✓ **Involve school administrators and teachers in promoting change.** Most school food service directors agreed that having a team of school administrators and teachers as healthy food advocates was critical in implementing the Smart Snacks policies. Directors said they discussed the changes in competitive foods with the superintendent, school principals, and teachers, and explained the impetus for the changes.

A few directors said that as a result of such discussions, health and physical education teachers discussed with students the importance of healthy snacks and selecting fruits and vegetables as snack options. One director also said that teachers were choosing healthy snack options and thus serving as positive role models for high school students. These directors said older children are set in their ways of eating, and younger children are more likely to eat fruit for snacks.

Eligible schools can obtain grant funding to give students greater access to healthy snacks in classrooms through the FFVP. Several school food service directors received an FFVP grant for grades K-6 and offered fruit or vegetable snacks to students every afternoon. Through the FFVP



and other grant programs, students were offered fresh fruits and vegetables such as apples, peaches, pears, carrots, celery, and broccoli.

✓ **Encourage parents to offer fruits and vegetables as snack options.** Some school food service directors said discussions with parents about the importance of healthy meals and snacks, and having fruits and vegetables at home, could promote student intake of these items during snack time at school. Directors commented that students and parents generally do not view fruits and vegetables as snacks. In addition, parents may not always have fruits at home and therefore may not offer these as snack options for their children.

A few school food service directors said they sent a list of healthy snack options home with children, and included fruits on the list. Other directors said they included the list of snack options on their Web site and in the student handbook, which parents also reviewed.

TECHNICAL ASSISTANCE RECOMMENDATIONS

School food service directors in this study have used a variety of strategies to achieve success in implementing

USDA's Smart Snacks provisions. Their experiences and approaches provide relevant insights that can be applied in developing training and technical assistance materials. Such materials should focus on the following areas:

1. **Maintaining food service revenue:** Offer strategies for identifying and obtaining compliant products that are appealing to students in order to maintain sales of competitive foods, and to convert à la carte sales to reimbursable meal sales.
2. **Marketing to school personnel and parents:** Offer strategies for addressing concerns of parents, school administrators, staff, and teachers, including responses to frequently asked questions, and for encouraging school administrators, staff, and teachers to promote healthy snack choices.

This research brief was produced by Westat under contract with the USDA Food and Nutrition Service.

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