




STATE OF CONNECTICUT  
DEPARTMENT OF EDUCATION



**TO:** Sponsors of School Child Nutrition Programs

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

**DATE:** September 30, 2014

**SUBJECT: Operational Memorandum #59-14**  
Smart Snacks Standards for Exempt Foods when Paired Together

This information applies **only** to schools and institutions that do **not** participate in Healthy Food Certification (HFC) under [Section 10-215f](#) of the Connecticut General Statutes. Public schools that participate in HFC must follow the requirements of the [Connecticut Nutrition Standards](#).

The Healthy, Hunger-Free Kids Act of 2010 (HHFKA) directed the U.S. Department of Agriculture (USDA) to establish nutrition standards for all foods and beverages sold to students on the school campus during the school day. On June 28, 2013, the Food and Nutrition Service (FNS) published the “Smart Snacks in School” (Smart Snacks) regulation that carefully balances science-based nutrition standards with practical and flexible solutions to promote healthier eating on campus. The Smart Snacks standards became effective July 1, 2014, and are codified at 7 CFR 210.11. The purpose of this memo is to clarify Smart Snacks standards for exempt foods that are paired together as a single snack.

The Smart Snacks standards provide exemptions for certain foods that are nutrient dense, even if they may not meet all of the specific nutrient requirements. For example, all fresh, frozen and canned fruits and vegetables that contain no additional ingredients are exempt from all of the nutrient standards because the USDA wants to encourage students to consume more of these foods. Similarly, peanut butter and other nut butters are exempt from the total fat and saturated fat standards, since these foods are also nutrient dense and primarily consist of healthier fats.

The regulation also addresses snacks that are “combination foods.” A combination food is a product that contains two or more foods representing two or more of the food groups: fruit, vegetable, dairy, protein or grains. When foods are combined, they no longer have any exemptions and must meet the nutrient standards that apply to a single snack.

However, the regulation does not specifically address the treatment of foods that are exempt from a Smart Snacks requirement when they are simply paired and packaged with other products (without added ingredients) that are also exempt from one or more of the Smart Snacks standards. The USDA recognizes that these “paired exemptions” are nutrient dense and contain foods that meet the intent of the Smart Snacks requirements.

“Paired exemptions” are items that have been designated as exempt from one or more of the nutrient requirements individually and packaged together without any additional ingredients. **These “paired exemptions” retain their individually designated exemption for total fat, saturated fat, and/or sugar when packaged together and sold.**

Based on the USDA’s research, when exempted food items are paired together they typically will not exceed the nutrient standards for total fat, saturated fat, trans fat, sugar or caffeine. However, to ensure that such “paired exemptions” continue to meet the intent of the regulations, “paired exemptions” are required to meet the calorie and sodium limits for Smart Snacks. Please note that an entrée item sold a la carte may **not** qualify as a “paired exemption.” Below are examples of “paired exemptions” that may be served together as a Smart Snack:

- *Peanut Butter and Celery*: Peanut butter is exempt from the total fat and saturated fat requirements. When it is paired with a vegetable or fruit, such as celery, the paired snack retains the fat exemptions and may be served if it meets the calorie and sodium limits.
- *Celery paired with peanut butter and unsweetened raisins*: As noted above, celery and peanut butter both have exemptions. Similarly, dried fruit, such as unsweetened raisins, is exempt from the sugar limit. However, the calorie and sodium limits still apply to the snack as a whole.
- *Reduced-fat cheese served with apples*: Reduced-fat cheese is exempt from the total fat and saturated fat limits. When it is paired with a vegetable or fruit, such as apples, the paired snack is only required to meet the calorie and sodium limits.
- *Peanuts and apples*: Peanuts are exempt from the total fat and saturated fat limits. When peanuts are paired with a vegetable or fruit, such as apples, the paired snack is only required to meet calorie and sodium limits.

Several tools and resources are available to help school staff, parents and students identify food items that meet the Smart Snacks criteria. Policy guidance and resource materials on Smart Snacks may be found on the USDA’s [Tools for Schools: Focusing on Smart Snacks](#) website. This site also includes many other practical resources, including a Smart Snacks calculator, a Smart Snacks fact sheet, ways to encourage children to make healthier snack choices and other resources to help schools create a healthier school environment by providing Smart Snacks.

Questions may be directed to:

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Fairfield County	Fionnuala Brown	<a href="mailto:fionnuala.brown@ct.gov">fionnuala.brown@ct.gov</a> 860-807-2129
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