

Commissioner's Memo
8/26/2019

Smart Snacks Regulations and Second Trays - Update

Memo Information

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Memo Date 8/26/2019

Memo Type Regulatory

Unit Child Nutrition

Regulatory Authority 7 CFR 210:11, USDA Policy Memos SP23-2014 and SP35-2014

Response Required NO

Attention Superintendents; Principals; Child Nutrition Directors/Managers

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Memo Text

The purpose of this memo is to explain the relationship between the United States Department of Agriculture (USDA)'s Smart Snacks Regulations and Second Trays. If second trays are served in any form, each item on the tray **MUST** meet Smart Snacks Regulations and Arkansas Nutrition Standards. This requirement applies to any school with any combination of grade configurations (K-12).

For the purpose of this memo, "second trays" can refer to multiple forms of a reimbursable tray served as a second meal: whole trays as a la carte, entrée only as a la carte, or entrée and/or side items as a la carte.

Reminders:

- Second trays are not reimbursable.
- Second trays are a la carte / competitive foods.

Competitive foods **MUST** meet Smart Snacks Regulations. Per USDA regulations, "Competitive food means 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."

A second tray that meets meal pattern for breakfast or lunch will not necessarily meet Smart Snacks Regulations. Each item on a second tray must be considered individually for comparison to the Smart

Entrees of Second Meals

Entrées that have been served as part of the National School Lunch Program (NSLP) or School Breakfast Program (SBP) reimbursable meal are exempt from the Smart Snacks requirements on the day of service in the NSLP and SBP, as well as the day after such an entrée is served in the NSLP or SBP as part of the reimbursable meal, whether as leftovers or simply cooked again on the second day (see USDA SP23-2014 Q&A Related to the “Smart Snacks” Interim Final Rule page 5 (2)). On the third day, the entrée must meet Smart Snacks Regulations.

For the National School Lunch Program, entrées are defined as an item that includes only the following three categories of main dish food items:

- A combination food of meat or meat alternate and whole grain rich bread; or
- A combination food of vegetable or fruit and meat or meat alternate; or
- A meat or meat alternate alone, with the exception of yogurt, low-fat or reduced fat cheese, nuts, seeds and nut or seed butters.

For the School Breakfast Program, schools may determine their entrée items.

Side Items of Second Meals

Side items (any item other than the entrée) on second trays have no exemptions and must meet Smart Snacks Regulations and Arkansas Nutrition Standards on each day served.

How can my cafeteria sell WHOLE second trays?

- Entrée item must be evaluated.
 - Is it being served on the day of service in a reimbursable meal or the day after service?
 - If yes, the entrée is exempt from Smart Snacks Regulations.
 - If no, the entrée must meet Smart Snacks Regulations (See attached flow chart and/or the Alliance Calculator) and AR Nutrition Standards
- Side items must be evaluated.
 - Must meet both Smart Snack Regulations (See attached flow chart and/or Alliance Calculator) and AR Nutrition Standards everyday they are part of a second tray.

How can my cafeteria sell only the entrée of a second tray?

- Entrée item must be evaluated.
 - Is it being served on the day of service in a reimbursable meal or the day after service?
 - If yes, the entrée is exempt from Smart Snacks Regulations.
 - If no, the entrée must meet Smart Snacks Regulations (See attached flow chart and/or Alliance Calculator) and AR Nutrition Standards.

How can my cafeteria sell the entrée and the side items of a second tray as individual items for a la carte?

- Entrée item must be evaluated.
 - Is it being served on the day of service in a reimbursable meal or the day after service?
 - If yes, the entrée is exempt from Smart Snacks Regulations.
 - If no, the entrée must meet Smart Snacks Regulations (See attached flow chart and/or Alliance Calculator) and AR Nutrition Standards.
- Side items must be evaluated.
 - Must meet both Smart Snack Regulations (see attached flow chart and/or Alliance Calculator) and AR Nutrition Standards everyday they are part of a second tray.

Example

On Tuesday, chicken strips were served as the entrée of a reimbursable lunch. Therefore, the chicken strips could be sold as a second meal (any form) on Tuesday or Wednesday without further documentation. If chicken strips were served as a second meal on Thursday, they would have to meet Smart Snack requirements and AR Nutrition Standards. Any side dishes served with the chicken strips would require documentation that they meet Smart Snack Regulations and AR Nutrition Standards on any day they are sold as part of a second tray (any form).

Resources

Visit the Arkansas Child Nutrition Unit webpage, under the Wellness tab, for all wellness policy, wellness committee, Smart Snacks, and AR Nutrition Standards resources, including a link to the Alliance for a Healthier Generation Product Calculator to help in determining Smart Snack compliance.

Summary

Second trays (including each item on the tray) must be treated as though they are an a la carte item; and, therefore, must meet all federal and state standards.

Second Trays = a la Carte = Smart Snacks and Arkansas Nutrition Standards

If you have questions or concerns, contact your Area Specialist or Stephanie Alsbrook at Stephanie.alsbrook@arkansas.gov or (501) 324-9502.

Attachments

- [2019_Understanding_Second_Trays_Flowchart_113548.pdf](#)

