



United States  
Department of  
Agriculture

Food and  
Nutrition  
Service

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Alexandria, VA  
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DATE: April 17, 2014

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SUBJECT: Grain Entrees Related to the Smart Snacks in School Standards

TO: Regional Directors  
Special Nutrition Programs  
All Regions

State Directors  
Child Nutrition Programs  
All States

The purpose of this memorandum is to clarify the status of grain-only items as entrées under the Interim Final Rule titled “National School Lunch Program (NSLP) and School Breakfast Program (SBP): Nutrition Standards for All Foods Sold in School as Required by the Healthy, Hunger-Free Kids Act of 2010,” also known as the Smart Snacks in School rule.

“Entrée item” is defined in the Smart Snacks in School rule as “an item that is either: (i) A combination food of meat or meat alternate and whole grain rich food; or (ii) A combination food of vegetable or fruit and meat or meat alternate; or (iii) 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 (such as dried beef jerky).” The interim final rule does not include grain-only items as entrée items. However, Food and Nutrition Service (FNS) understands this may limit the availability of products which are healthy choices that students are accustomed to having for breakfast. Therefore, a school food authority (SFA) is permitted to determine which item(s) are the entrée items for breakfasts offered as part of the SBP.

As with NSLP entrée items, any entrée item offered as part of the SBP is exempt from all competitive food standards if it is offered as a competitive food on the day of, or the day after, it is served in the SBP. For example, if the SFA serves whole-grain rich pancakes as the main dish for the SBP, then they can be considered an entrée and be exempt from the standards on the day of and the day after they are served. Exempt entree items offered as a competitive food must be offered in the same or smaller portion sizes as in the NSLP or SBP.

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The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

Regional Directors  
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Side dishes offered as part of the NSLP or SBP and sold a la carte must always meet the nutrition standards contained in the Smart Snacks in School rule. Side dishes and snacks offered as part of a reimbursable lunch or breakfast are not exempt from the Smart Snacks nutrition requirements. In the example above, the other items offered as part of the pancake meal would be considered side dishes and, as such, would not be exempt from the Smart Snacks requirements.

In cases in which the school does not participate in the SBP and grain-only items such as bagels, waffles, etc. are offered for sale in the school, such items, along with their accompaniments, must meet all of the Smart Snacks standards prescribed for side dishes or snack items whenever sold to students.

Additional information on Smart Snacks in School is available on the FNS website and may be found at <http://www.fns.usda.gov/school-meals/smart-snacks-school>.

State agencies are reminded to distribute this memorandum to program operators. Local education agencies and SFAs should contact their State agency for additional information. State agencies may direct any questions concerning this guidance to the appropriate FNS Regional Office. We look forward to continuing to work with you on improving the nutrition of our Nation's children.

**Original Signed**

Cynthia Long  
Deputy Administrator  
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