

## Smart Snacks and Fundraisers

Nutrition standards for all foods and beverages sold at school helps to create a healthy environment for students. Smart Snacks Standards apply to food fundraisers and as well as food sold by the food service staff. This document answers questions about Smart Snacks and fundraisers.

### Basic Questions

#### Does it follow *Smart Snacks Standards*, Yes or No?

1. Is the food or beverage item being sold?
2. Is it being sold to students?
3. Is it being sold during the school day?
4. Is it being sold at school?
5. Is it intended for students to eat during the school day?
6. Is it being sold separate from a reimbursable school meal?

If yes, to all of these questions, then the food or beverage must meet *Smart Snack Standards*.

**What can we sell for a fundraiser?** If the item being sold is a nonfood item or a food item that meets the Smart Snacks standards, it can be sold anytime. In Public Act 42, the State of Michigan allows for 2 exempt fundraisers per building per week. That allows the sale of foods that do not meet the standards. These fundraisers may not be sold in competition with school meals in the food service area during the meal service. [7 CFR 210.11(b)(4)] Organizations planning fundraisers should work with their school administration before initiating a fundraiser to ensure compliance with the Local Wellness Policy, Smart Snacks standards, and any other local policies that may be in place. A school's Local Wellness Policy may have stricter standards and allow fewer non-compliant fundraisers.

**What if the foods do not meet the standards?** Generally, foods that do not meet the standards cannot be sold to students on campus during the school day. Organizations planning fundraisers of foods that do not meet the standards must work with their school administration to determine if their fundraiser can be allowed as one of the school's limited exempt fundraisers. It is important to remember that the standards do not apply during non-school hours, on weekends, and at off-campus fundraising events, though local policies may still apply.

**No more frozen pizza sales? No more cookie dough? No more Thin Mints®\* cookies?** Not necessarily! Many extracurricular programs, such as the school band, sports teams, and the school choir as well as youth-based community organizations

such as the scouting programs rely on fundraisers to support their activities. There are ways that these groups can continue to raise money on campus under the standards, if allowed under local policies and approved by the school administration.

First, remember that all fundraising activities that take place outside of school are exempt from Smart Snack Standards. Just double-check your Local School Wellness Policy to see if other local school policies are in place!

Sale of frozen pizza, cookie dough and other items preordered and distributed in a precooked state or in bulk quantities (multiple servings in a package) for consumption at home is not required to meet the standards. For example, boxes of preordered Girl Scout cookies intended for consumption at home would not be subject to the standards. Students could take orders and deliver them during the school day for consumption outside of school.

**Can we take fundraising orders at school?** Yes. Orders may be taken at school as long as the foods being sold meet the Smart Snacks standards or are not intended to be consumed on campus during school hours and as long as students receive permission from the school.

**Can we deliver the preordered fundraising items at school?** Foods that have been purchased through a fundraiser may be delivered on the school campus during the school day if the foods being sold meet the standards or are not intended to be consumed on campus during school hours and as long as students receive permission from the school. However, we encourage organizations to deliver the foods at a time when parents and caregivers are more likely to be present to collect the items, for example, during specific drop off or pickup times.

**Can we sell individual food items that students can eat during the school day?** If the foods being sold meet the standards, then you may sell them during the day. However, when the fundraiser includes the sale of food items that do not meet the standards, for example, a doughnut or a candy bar, the fundraiser must be considered an approved exempt fundraiser in accordance with the State agency. The fundraising organization, such as the school band, could then sell doughnuts or candy to students during the allocated exempt fundraising period. Communication between youth-based organizations and school administration is critical when planning fundraising events on school campus during the school day.

**What are ideas for non-food fundraisers?** Non-food fundraisers can be a huge success and then they don't compete with school meals. The United States Department of Agriculture (USDA) does not have restrictions on non-food fundraisers. Activity or academic-based fundraisers, such as a fun run or read-a-thon, can benefit students and clubs. Selling books, fresh produce, or school spirit merchandise are all healthy fundraising options. Check out [Action for HealthyKids](#) and [Alliance for Healthier Generation](#) for more healthy fundraising ideas.

## **What are definitions of terms used in the Smart Snacks for Schools standards?**

**Competitive food:** All food and beverages other than reimbursable meals from Child Nutrition Programs available for sale to students on the school campus during the school day.

**Beverage:** This includes dairy beverages or dairy drinks (such as drinkable yogurt, milk shakes, and protein shakes) or coffee drinks (such as cappuccinos, mochas, or lattes).

**Entrée:** An item that is intended as the main dish and is either:

- 1) A combination food of meat or meat alternate and whole grain-rich food
- 2) A combination food of vegetable or fruit and meat or meat alternate
- 3) A meat or meat alternate alone with the exception of yogurt, low-fat or reduced fat cheese, nuts, seeds, nut or seed butters, and meat snacks (beef jerky)

**Fundraiser:** An event that includes any activity during which currency/tokens/tickets, etc. are exchanged for the sale/purchase of a product in support of the school or school-related activities. Purchasing tickets or tokens to be exchanged later for food items would also be considered to be a sale of food and/or a fundraiser and would be subject to Smart Snacks standards.

**Snack:** Includes products such as chips, popcorn, nuts, snack-type bars (i.e., cereal, granola, and fruit and nut bars), ice cream, and sometimes frozen fruit, including frozen juice see [USDA's Q&A Related to the Smart Snacks Interim Final Rule](#) for guidance.

**Side:** A product that is sold in addition to an entrée at a meal, such as rice, steamed vegetables, mashed potatoes, or French fries.

## **What are the general nutrition standards for competitive foods?**

To be allowable, a competitive food must: [7 CFR 210.11(c)(2)]

- 1) Be a grain product that contains 50% or more whole grains by weight or have as the first ingredient a whole grain; or
- 2) Have as the first ingredient be either a fruit, vegetable, dairy or protein food (meat, beans, poultry, seafood, eggs, nuts, seeds, etc.); or
- 3) Be a combination food that contains ¼ cup of fruit and/or vegetables; or
- 4) If water is the first ingredient, the second ingredient must be one of the food items listed in 1, 2, or 3 above.

## **What are the specific nutrition standards for foods? [7 CFR 210.11(d-k)]**

- **Total Fat:** cannot be more than 35% of total calories from fat per item as packaged or served

- **Saturated Fat:** must be less than 10% of total calories per item as packaged or served
  - Total fat and saturated fat exemptions include some cheese, nuts, seeds and nut butters, dried fruit, and whole eggs. [7 CFR 210.11(f)(3)]
- **Trans Fat:** must be zero grams trans fat per portion as packaged or served
- **Total Sugars:** cannot be more than 35% of weight per item as packaged or served
  - Exemptions include dried fruits and vegetables [7 CFR 210.11(h)(2)]
- **Snack Items and Side Dishes:** no more than 200 calories and 200 mg of sodium per item as packaged or served, included any added condiments such as butter, cream cheese, salad dressing, etc. 7 CFR 210.11(i).
- **Entrée items:** no more than 350 calories and 480 mg of sodium per item as packaged or served, including added accompaniments such as butter, cream cheese, salad dressing, etc. 7 CFR 210.11(j).
- **Grains:** Grain products that are at least 50% whole grains by weight or have whole grain as the first ingredient are acceptable and must meet all other nutrient standards.
- **Fruits and Vegetables:** Fresh, frozen, and canned fruits and vegetables with no added ingredients other than water, juice, light syrup, or are low sodium are allowed and do not need to meet additional nutrition requirements. [7 CFR 210.11(d)]
- **Sugar-free chewing gum** is allowed to be sold to students on the school campus during the school day, at the discretion of the local educational agency.

### **What are High School Beverage Standards? [7 CFR 210.11(m)(3)]**

Allowable beverages for high school-aged students are:

- 1) Plain water or plain carbonated water (no size limit);
- 2) Low-fat milk, flavored or unflavored (no more than 12 fluid ounces);
- 3) Non-fat milk, flavored or unflavored (no more than 12 fluid ounces);
- 4) Nutritionally equivalent fluid milk substitutes (no more than 12 fluid ounces);
- 5) 100% fruit/vegetable juice, and 100% fruit and/or vegetable juice diluted with water (with or without carbonation and with no added sweeteners) (no more than 12 fluid ounces);
- 6) Calorie-free, flavored water, with or without carbonation (no more than 20 fluid ounces);
- 7) Other beverages that are labeled to contain less than 5 calories per 8 fluid ounces, or less than or equal to 10 calories per 20 fluid ounces (no more than 20 fluid ounces); and
- 8) Other beverages that are labeled to contain no more than 40 calories per 8 fluid ounces or 60 calories per 12 fluid ounces (no more than 12 fluid ounces).
- 9) Caffeine is allowed at the high school age.

## **What are Middle School Beverage Standards? [7 CFR 210.11(m)(3)]**

- 1) Plain water or plain carbonated water (no size limit)
- 2) Low-fat milk, flavored or unflavored (no more than 12 fluid ounces)
- 3) Non-fat milk, flavored or unflavored (no more than 12 fluid ounces)
- 4) Nutritionally equivalent fluid milk substitutes (no more than 12 fluid ounces)
- 5) 100% fruit/vegetable juice, and 100% fruit and/or vegetable juice diluted with water (with or without carbonation and with no added sweeteners) (no more than 12 fluid ounces)
- 6) Note: Elementary school beverage standards are the same as middle school, except the portion size is limited to 8 fluid ounces, instead of 12 fluid ounces.

## **Is there help calculating if a product meets the standards?**

The [Smart Snacks Calculator Tool](#) makes it easy to know if a product meets Smart Snack Standards.

## **What USDA Memos cover Smart Snacks?**

- [SP 23-2014 \(v. 3\)](#) – Questions and Answers Related to the “Smart Snacks” Interim Final Rule
- [SP 36-2014](#) – Smart Snacks Nutrition Standards and Exempt Fundraisers
- [SP 59-2014](#) – Implementation of Smart Snacks in School: State Agency Fundraiser Elections and Exemptions

**Need more information?** USDA offers a number of tools and resources to help school staff, parents, and students navigate fundraising tactics including the following:

- [Memorandum: Smart Snacks Nutrition Standards and Exempt Fundraisers](#)
- [Issue Brief: Fundraisers](#)
- [Guide to Smart Snacks in Schools 2022](#)

Other policy guidance and resource materials on Smart Snacks may be found at:

- [USDA Food and Nutrition Service Smart Snacks in Schools](#)
- [Michigan Smart Snacks in Schools](#)
- [Centers for Disease Control and Prevention](#)

\*Mention of companies or commercial products does not imply recommendation or endorsement by the U.S. Department of Agriculture over others not mentioned or shown.

Links Used in This Document:

<https://www.actionforhealthykids.org/activity/healthy-fundraising/>

<https://www.healthiergeneration.org/take-action/schools/wellness-topics/smart-snacks/fundraising>

<https://foodplanner.healthiergeneration.org/calculator/>

<https://www.fns.usda.gov/cn/qas-smart-snacks-interim-final-rule>

<https://www.fns.usda.gov/cn/smart-snacks-nutrition-standards-and-exempt-fundraisers>

<https://www.fns.usda.gov/cn/state-agency-fundraiser-elections-and-exemptions>

<https://www.fns.usda.gov/cn/smart-snacks-nutrition-standards-and-exempt-fundraisers>

[https://www.fns.usda.gov/sites/default/files/allfoods\\_fundraisers.pdf](https://www.fns.usda.gov/sites/default/files/allfoods_fundraisers.pdf)

<https://www.fns.usda.gov/tn/guide-smart-snacks-school>

<https://www.fns.usda.gov/cn/smart-snacks-school>

[https://www.michigan.gov/mde/0,4615,7-140-43092\\_50144-327975--,00.html](https://www.michigan.gov/mde/0,4615,7-140-43092_50144-327975--,00.html)

<https://www.cdc.gov/healthyschools/nutrition/smartsnacks.htm>