



April 13, 2011

Julie Brewer

Chief, Policy and Program Development Branch, Child Nutrition Division
Food and Nutrition Service, Department of Agriculture
3101 Park Center Drive, Room 640
Alexandria, Virginia 22302-1594

Docket ID: FNS-2007-0038-0001

Re: Nutrition Standards in the National School Lunch and School Breakfast Programs

Dear Ms. Brewer:

Trust for America's Health (TFAH), a nonprofit, nonpartisan organization dedicated to saving lives by protecting the health of every community and working to make disease prevention a national priority, strongly supports the Food Nutrition Service (FNS) proposed rule and implementation timeline for nutrition standards for the school meal programs.

We were pleased that this rule proposes to align the meal patterns and nutrition requirements for the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) with the 2005 "Dietary Guidelines for Americans," incorporating recommendations from the National Academies' Institute of Medicine report "School Meals: Building Blocks for Healthy Children." However, given that the 2010 "Dietary Guidelines for Americans" was recently released, federal nutrition standards should be consistent with these newest science-based nutritional recommendations. Thus, we urge full alignment with these guidelines as soon as possible.

School meals play a significant role in children's diet, constituting the majority of daily calories consumed for many students. Therefore, this rule, once implemented, will be a fundamental step towards addressing the epidemic of childhood obesity, and improving the long-term health of America's children. According to TFAH's 2010 report *F as in Fat: How Obesity Threatens America's Future*, childhood obesity rates are greater than 20 percent in eight states and the District of Columbia.¹ We strongly urge full implementation within the USDA proposed timeline in order to ensure that children promptly benefit from increased access to nutritious meals, and that school food service staff have adequate training and technical assistance required to implement the changes.

¹ Trust for America's Health. *F as in Fat: How Obesity Threatens America's Future*. Washington, D.C.: Trust for America's Health, 2010.

We hope that you will consider the following comments and recommendations as you finalize these important nutritional standards.

Implementation Schedule and Framework

Implementation Schedule

TFAH strongly supports the FNS proposed timeline to begin implementing the new nutritional standards in the 2012-2013 school year, including the gradual phasing in of increases in whole grain requirements, and decreases in sodium content in meals. While full implementation of updated nutritional standards will take resources and time, the proposed timeline should allow ample time for adequate training, and implementation of proposed changes. The USDA has been recommending changes to nutritional standards in schools (including increased servings of fruits, vegetables, and whole grains, and reductions in sodium and trans fat) since 2005, when the 2005 *Dietary Guidelines* were released. In 2009, the Institute of Medicine published a report entitled “School Meals: Building Blocks for Health Children,” which made recommendations to facilitate aligning school meals with the *Dietary Guidelines*. Today, over ten years since the 2005 *Dietary Guidelines* were released, and even after the 2010 *Dietary Guidelines* were released, still most school meals are not in accordance with the USDA’s dietary guidance. TFAH urges against delaying implementation until it is feasible to fully align school meals with the 2010 *Dietary Guidelines*, as updated nutritional standards for school meals are long overdue. However, we do strongly urge modifications based on the 2010 *Dietary Guidelines* to be incorporated into this rule, and full alignment to be made as soon as as possible. The final rule could provide clarification as to USDA’s outlook for long-term feasibility of achieving compliance with 2010 *Dietary Guideline* recommendations. We are pleased to note that many of the standards contained within the proposed rule would already meet 2010 *Dietary Guidelines*, but more can and should be done to reach full adherence.

Training and Technical Assistance

TFAH was pleased by the FNS acknowledgement of the importance of providing adequate training and technical assistance to school service staff, which will facilitate effective and timely implementation of nutritional standards. We strongly encourage the USDA to initiate intensive training and technical assistance as soon as possible. We support the technical assistance areas mentioned, including providing guidance materials on whole grains, fruits, and vegetables, updating USDA menu planning resources and Child Nutrition Database, and participation in public forum discussions.

Collaboration

In order to ensure effective and sustainable implementation of nutritional standards, we strongly urge the USDA to collaborate with a variety of partners during the implementation process, including food service staff, relevant agencies, nonprofit organizations, the food and beverage industry, and the community.

Further, it is imperative to engage partners that will facilitate a multidimensional approach toward improving the health of America's children. We must address not only nutrition, but also other factors affecting health, such as lack of physical activity, and nutritional and physical education opportunities. Only 33 percent of high school students had daily physical education, and only 56 percent of high school students had a physical education class at least once a week.² Therefore, we were pleased to have FNS mention the HealthierUS School Challenge, which acknowledges schools that provide nutritious food and beverage choices, and opportunities for health education and physical activity. We strongly encourage the USDA to make engagements of this type a priority in the implementation of nutritional standards.

Community Engagement

Improving the nutritional quality of school meals, and providing health education in schools, is certainly imperative to the health of children, and may encourage change in behaviors outside of schools. Nonetheless, children are exposed to foods and eating habits outside of schools as well. Therefore, it is extremely important to engage the community in order to educate children, and their families, about nutritious foods, eating habits, and other healthy habits. This relies on intimate engagement with community partners and children's families. It also requires transparency about the extent to which schools are achieving and complying with nutritional standards.

Nutrition Promotion

Ultimately, implementation and adherence of the proposed changes depend not only on adequate training and technical assistance provided to school service staff, but also take-up and participation of schoolchildren. Companies and parents alike know that children's food preferences, diets and health are influenced by food marketing.³ Unfortunately, children are exposed continually to marketing for unhealthy foods, and are often accustomed to foods that are high in sodium or fat. Therefore, we strongly urge implementation of promotion and marketing campaigns to make healthy foods more appealing to students. Nutritional promotion should take into account collaboration with relevant entities, and engagement of students through considerations of cultural preferences, the link between learning in the classroom and cafeteria, and partnership with local food providers.

² U.S. Centers for Disease Control and Prevention, "Youth Risk Behavior Surveillance – United States 2009," *MMWR Surveillance Summaries* 59, no. SS05 (2010). <http://www.cdc.gov/mmwr/pdf/ss/ss5905.pdf> (accessed July 16, 2010).

³ Institute of Medicine. 2006. *Food Marketing to Children and Youth: Threat or Opportunity?* Washington, DC: National Academies Press.

School Breakfast Program

We strongly support the proposed changes to the SBP to align school breakfasts with the *Dietary Guidelines*. Given the large role that breakfast can play in a child's health and development, and that the SBP served an average of 11.6 million children daily in 2010, enhancing the effectiveness of this program should be a priority. Research shows that consuming breakfast daily decreases the likelihood of children to be overweight, improves general nutrition, and improves cognitive functioning (evidenced by improved scores on standardized tests). Aligning the SBP with the *Dietary Guidelines* is an investment in children's daily functioning in schools, and future health.

Standards for Menu Planning

Aligning the school nutritional standards with the 2005 *Dietary Guidelines* will substantially enhance the nutritional quality of foods accessible to our nation's children. According to TFAH's 2010 report *F as in Fat: How Obesity Threatens America's Future*, twenty states and D.C. have more strict nutritional standards for school lunches, breakfasts and snacks than current USDA requirements—up from only four states five years previously.¹ We are making significant improvements in children's health; however, we have much progress left to be made. TFAH was pleased that the proposed changes are focused on providing children with appropriate calorie levels and nutrient-rich meals, and that they are based on the 2009 Institute of Medicine (IOM) report "School Meals: Building Blocks for Healthy Children."

Fruits and Vegetables, Page 2500

We strongly support the USDA's proposal to increase the variety and amount of servings of fruits and vegetables in school meals. Given that most children and adolescents do not consume the daily recommended amount of servings of fruits and vegetables, this is a fundamental step toward ensuring the healthy development of schoolchildren. We also agree with allowing fruit juice to account for up to only one-half of the daily fruit requirement. In order to increase the effectiveness of this proposal, we suggest the following:

- Prohibit schools from deep-frying all foods (vegetables included).
- In order to better align nutritional standards with the 2010 *Dietary Guidelines*, we suggest including red vegetables, such as tomatoes, bell peppers and radishes, in the orange subgroup, which would also allow increased menu planning flexibility for SFAs.
- Provide adequate training and technical assistance to school service staff with regard to marketing and promotion, cultural preferences, student acceptability, menu planning, and cost control.

Whole grains, Page 2500

We support the proposed increases in whole grain requirements for school meals; however, we have concerns that the IOM definition of whole grain servings does not ensure that grain products contain 50 percent whole grain. We urge full alignment with the *Dietary Guidelines*, which state that 50 percent of total grains consumed should be whole grains. This would help to further limit the amount of refined grains consumed by children.

Sodium

TFAH was very pleased that the USDA placed great importance on significantly reducing sodium levels in school meals. We agree that sodium reductions should be phased in gradually, in order to increase take-up and participation rates of children. The 2010 *Dietary Guidelines* provide science-based recommendations, and recommends that children under the age of 14 should have a maximum sodium intake of 1,500 mg per day. Therefore, we urge that gradual reductions in sodium levels be based on this ultimate goal. Further, we encourage the USDA to continually monitor progress in reaching relevant benchmarks.

Added sugars

TFAH is concerned that limiting added sugars is not included in this rule proposal. We understand that differentiating between added and natural sugars may place an excessive burden on school food service providers, and therefore, we recommend limiting availability of foods that may be the largest contributors of added sugars in children's diets. These include dairy-based desserts, ready-to-eat cereals, flavored milk, and grain-based desserts. Moreover, we recommend that the USDA collaborate with the FDA to modify Nutrition Facts labels to list amount of added sugars present in food products.

Fluid Milk

TFAH was very pleased to see the proposed requirement for only low-fat unflavored and fat-free unflavored and flavored milk, which is consistent with both the 2010 *Dietary Guidelines*, and the Institute of Medicine recommendations.

Saturated Fat and Trans Fat

TFAH supports the proposal to maintain the nutritional requirement for the National School Lunch Program and School Breakfast Program to have less than 10 percent of calories to be from saturated fat, which is consistent with recommendations from both the 2010 *Dietary Guidelines* and the Institute of Medicine. We also support the proposal to minimize levels of trans fat, with an emphasis on having only foods with zero grams of trans fats per serving. This is also consistent with both the recommendations from both the 2010 *Dietary Guidelines* and the Institute of Medicine.

Thank you for this opportunity to comment on the FNS proposed Nutrition Standards in the National School Lunch and School Breakfast Programs. Improving the health of America's children will require collaboration between all sectors of society in order to reduce barriers to healthy eating and active living, and the FNS proposed rule represents a significant step forward in our efforts to make it easier for children and adults to make healthy eating choices.

We hope that our comments will assist the USDA in fully implementing nutrition standards for the school meal programs. If you have any questions, please do not hesitate to contact our Government Relations Representative, Jack Rayburn, at (202) 223-9870 ext. 28, or via email at jrayburn@tfah.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey Levi". The signature is written in a cursive, flowing style.

Jeffrey Levi, Ph.D.
Executive Director