



**SCHOOL  
NUTRITION  
ASSOCIATION**

*Making the right food choices, together.*

October 22, 2008

Carole Davis  
Co-Executive Secretary of the Dietary Guidelines Advisory Committee  
Center for Nutrition Policy and Promotion  
U.S. Department of Agriculture  
3101 Park Center Drive Room 1034  
Alexandria, VA 22302

Dear Ms. Davis:

The School Nutrition Association is pleased to respond to the solicitation of comments issued by the Department of Agriculture and the Department of Health and Human Services regarding the first meeting of the 2010 Dietary Guidelines Advisory Committee and pertinent review of the *Dietary Guidelines for Americans*.

SNA supports dietary guidelines that provide consistent standards throughout the country and throughout schools. USDA should provide a consistent and understandable meal pattern for school meals that meets the dietary guidelines. The final guidelines should be practical and achievable within the school meal program. We are happy to provide the following context for our recommendations.

**Overview**

In 1994, Section 106(b) of the Healthy Meals for Healthy Americans Act (PL 103-448, 42 U.S.C. 1758(f)) required that not later than the first day of the 1996-97 school year, schools that are participating in the school lunch or school breakfast program shall serve lunches and breakfasts under the programs that are consistent with the *Dietary Guidelines for Americans*. SNA strongly supported this provision in 1994, and we continue to strongly support the use of *Dietary Guidelines for Americans* today. Our 55,000 members at 100,000 schools serving 30 million students over 36 million breakfasts and lunches daily have the legal obligation to meet these standards, and are committed to serving the best meals that are possible within our limited reimbursement rates.

USDA's Food and Nutrition Service on December 17, 2007, urged that School Food Authorities "...begin proactively implementing the applicable recommendations of the 2005 DGAs within the current meal pattern requirements and nutrition standards."

Congress will be reauthorizing the child nutrition programs in 2009, prior to the completion of the 2010 Guidelines. SNA is already heavily involved in this reauthorization effort. Some of our members are trained professional dietitians, and some are not. Some schools have excellent food preparation facilities, and others can only serve meals provided to them. Regardless of professional capability and available facilities, we have to provide a school lunch within the current federal reimbursement rate of \$2.57. For these reasons we want to work with you for the development of dietary guidelines that are practical and

are achievable. Standards should be written in plain language so that people of all capabilities can readily understand them. As those tasked with implementing the Guidelines, we also must be sure that the meals we serve are attractive to our national student body. The achievement of good nutrition depends upon consumption and education, in addition to a carefully designed program.

Some of our comments go beyond the important issue of the 2010 Dietary Guidelines. But as a practical matter, we must raise the context in which the Guidelines are implemented.

### **Priorities for 2009 Reauthorization of Child Nutrition Programs**

SNA recently provided our comments to the Food and Nutrition Service regarding reauthorization of child nutrition programs next year. In those comments we suggested our top two priorities: (1) school foods should follow consistent nutrition standards throughout the nation and throughout the school; and (2) reimbursement rates should reflect actual meal costs.

#### ***Consistent Standards Throughout the Nation and Throughout Schools***

SNA believes that there should be a consistent national nutrition standard throughout the country, and the Secretary of Agriculture should have the authority to regulate the sale of all foods and beverages sold on the school campus, thus ending the "time and place" rule.

USDA should provide a consistent and understandable meal pattern that meets the dietary guidelines. The children in California need the same nutrients for healthy development that are needed by the children in South Dakota and Florida. Schools have a critical role to play in the fight against obesity. We must, however, craft a standard that would NOT undermine the financial status of many local programs thereby jeopardizing their service to children, including low income children. We must recognize that many of our suppliers tell us that a multitude of standards drives up their costs. The greater the disparity in nutrition standards, the higher the cost to schools.

Schools are learning environments, and school meals offer a wonderful opportunity to use the meal as a source of nutrition education. If we are successful in helping children make good food selections and learn good nutrition habits from an early age, we are convinced that the use of these formative years in a positive fashion will make a life-long difference.

#### ***Reimbursement Rates Should Reflect Meal Costs***

We urge USDA to please support an increase in the federal reimbursements as a part of any legislation to improve school meals and nutrition standards anywhere in schools. Foods meeting higher nutritional standards often bear higher prices. If reimbursement rates are not increased to reflect these higher costs, then our ability to meet current and revised dietary guidelines is severely impacted.

Over the past several years, school nutrition programs have made tremendous strides in offering more whole grains, more fresh fruits and vegetables, and more low-fat dairy products. All of these healthy food items cost more in today's marketplace. Due to the increase in food, milk and energy costs, combined with high labor and benefits costs, the federal school meal reimbursement no longer covers the cost to prepare a balanced, nutritious school meal. In 2007-2008, USDA reimbursed local schools \$2.47 for every "free" lunch provided to a child with income below 130% of the poverty line...less than the price of a latte at the neighborhood coffee shop. While the new federal reimbursement for school year 2008-2009 will be \$2.57 per meal, the cost to prepare a school meal averages over \$2.90. School nutrition programs lose money on each school meal provided. As you know the national school lunch program produces 5 billion meals per year, which mean programs, on a national average, are losing approximately \$2.5 billion dollars per year on school lunch alone. Financial losses on the school lunch and breakfast programs are estimated at more than \$4 billion dollars per year!

## **SNA Has Developed National Nutrition Standards Recommendations**

In anticipation of the 2009 Child Nutrition Reauthorization, and recognizing the impending 2010 Dietary Guidelines for Americans review, SNA undertook a careful and thoughtful review of foods available for purchase in schools. Since the 2005-2006 school year, the SNA has engaged in a dialogue with school nutrition directors, state agency personnel, school food industry members, USDA officials and allied organizations on the need for uniform national school nutrition standards that would address school meals and foods and beverages sold outside of school meals. A series of open town hall discussions, mega issue discussions and an open comment period on proposed standards culminating in an SNA National Nutrition Standards Summit held in January 2008 provided key input from all sections of SNA membership as well as other interested individuals.

In the spring of 2007, SNA's Board of Directors established the SNA National School Food and Beverage Standards Task Force to develop a set of nutrition standard recommendations for both reimbursable meals and food and beverages sold or served outside of reimbursable meals. I was honored to chair this Task Force. The Task Force of 10 included SNA members that are school nutrition directors and state agency directors, as well as SNA industry members and non-members who are academic experts in the nutrition field. The Task Force met on several occasions over 12 months.

As a result of these efforts, we developed general recommendations to serve as our guiding principles. We also developed Meal Pattern Recommendations for School Breakfast and Lunch, Summer Feeding Programs and After School Snack Programs, and Recommendations for Items Sold/Served on the School Campus Outside of Reimbursable Meals

### ***Meal Pattern Recommendations for School Breakfast and Lunch, Summer Feeding Programs and After School Snack Programs***

Standards for reimbursable meals and reimbursable snacks will promote the consumption of a variety of foods and beverages from all food groups. SNA believes that the nutrient content of foods and beverages should be averaged over a week, rather than nutrient profiling of an individual day or single food or beverage product. We endorse all currently approved menu planning systems, including offer versus serve. Our recommendations are consistent with current Dietary Reference Intakes (DRIs), 1/3 for lunch and 1/4 for breakfast for the following dietary elements: calories, protein, vitamin A, vitamin C, calcium, and iron. Calories and nutrients may need to be adjusted based on age and energy needs, including those for Pre K-Grade 3. Our recommendations are consistent with current Dietary Guidelines for Americans (DGAs) for fat, saturated fat, sodium, and fiber.

Of particular importance, SNA recommends that meeting these nutrient standards will be phased in over time. It takes time and effort to encourage young people to try foods that are new to them, and to develop a preference for these new foods. Many of our members have had the experience of trying a new item or a new preparation, only to have meal sales go down. If we do not serve an acceptable meal, then students will bring food from outside of the cafeteria and we will have no ability to ensure that meal's nutrient content.

### ***Recommendations for Items Sold/Served on the School Campus Outside of Reimbursable Meals***

Foods and beverages sold/served outside reimbursable meals should complement, rather than compete with reimbursable meals and snacks, in order to support the DGAs. Local districts should be encouraged to develop standards for classroom parties and celebrations, another source of food outside of the cafeteria. We believe that state or local wellness policy/initiatives may be more restrictive in the items sold/served, but may not alter the nutrition standards of items. Authority needs to be given to the USDA for periodic review and updating based on nutrition science and the healthy status of children.

## **Dietary Guidelines Are Important for Schools, but Need Broad Public Support**

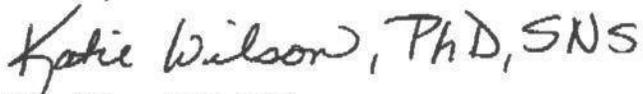
Foods and beverages available at school can contribute to teaching children lifelong healthy eating habits. This principle will be accomplished in partnership with school foodservice professionals, teachers, parents, and the broader community. Schools are often an important source of meals, but they are not the only source of meals. Meals consumed outside of school hours, on weekends, and during academic breaks should also meet nutritional goals. We must work with others in our communities to succeed in reaching this broader objective. Current and future implementation of these standards will require a collaborative effort with all stakeholders.

## **Dietary Guidelines Should be Based on Science, Not on Statute**

We know that nutrition science is constantly evolving and that many eminent individuals and organizations are working to improve this base of knowledge. However, some may believe that it is preferable to establish nutrient standards as a matter of law for the certainty that those standards might bring. While we agree with the need for standards that are based on science and offer some stability, we are concerned that establishing standards as a matter of law may lock in standards that over time become outdated. The legislative process by its very nature is a slow one that is not designed to respond to new prudent developments. Standards should be developed as part of a transparent regulatory process, offering the opportunity for public comment and review, as well as modification when conditions warrant. We would urge the Committee to argue against legislatively mandated standards.

SNA looks forward to working with the Dietary Guidelines Advisory Committee as the 2010 *Dietary Guidelines for Americans* are developed. We would be pleased to participate in any meetings or other activities that the Committee holds as may be appropriate.

Sincerely,



Katie Wilson, PhD, SNS  
President