

**SNE Comments on the Institute of Medicine (IOM) Report:
*Nutrition Standards & Meal Requirements for National School Lunch and Breakfast
Programs, Phase I. Proposed Approach for Recommending Revisions***

The Society for Nutrition Education (SNE) recognizes the challenges this IOM Committee has in providing recommendations for updating and revising the food and nutrition standards and requirements for school meals. While challenging, the findings of this Committee can influence the upcoming Child Nutrition Reauthorization process and address serious child nutrition and health issues.

SNE found the Phase I report comprehensive and believes it lays a great foundation for looking ahead. SNE appreciates this opportunity to build on the Phase I report by sharing the following comments on the IOM's proposed approach to developing recommendations for nutrition standards and meal requirements.

1. Using the working principles to guide data selection, analyses and reviews and to focus committee deliberations.

The working principles identified in the report reflect the wide range of factors that must be considered when forming recommendations. SNE encourages IOM to recommend enhancing the role of food and nutrition education in: 1) improving the ability of school meal programs to meet the nutritional needs of children; 2) addressing concerns related to alarming trends of increased obesity and chronic disease among young people; 3) providing the technical assistance necessary to ensure the implementation of practical and economical recommendations in these financially challenging times; and 4) developing menus offering foods that children will readily accept.

Children are more likely to eat healthy foods offered at school if they are given the opportunity through nutrition education to prepare and taste new foods and participate in decisions about choices for the school foods menus. Several states and numerous school districts have improved their school food environment.¹ These improvements included innovative strategies to educate and involve students and staff with the end result of less plate waste and much more enthusiasm for school meals.² For example, Sequoia Middle School in Fresno, California³ has made sweeping changes to its food environment with a dedicated team of foodservice staff, school administrators, teachers, parents, and students. The offering of healthy foods through their school meal programs, vending machines, and fundraisers has been supported by actively engaging students in the planning process and food culture. Equally as important to the process has been standardizing the provision of nutrition education on campus. As a result, Sequoia

¹ National Conference of State Legislatures. Legislative Tracking Resources.
<http://www.ncsl.org/programs/health/KelloggHealthOverview.htm>

² Pranis, Eve. Nourishing Choices: Implementing Food Education in Classrooms, Cafeterias, and Schoolyards. National Gardening Association, S. Burlington, VT. 2008. www.garden.org

³ California Food Policy Advocates. Improving Meal Quality in California's Schools: A Best Practices Guide for Healthy School Food Service. April 2003.

Middle School has seen their foodservice profits exceed those from when “junk food” was sold. A dramatic decrease in behavioral problems has also been observed among students.

2. Assessing the dietary intakes of food groups, food subgroups, and nutrients by schoolchildren to identify the food and nutrient intakes of concern.

SNE supports further investigation on the calorie levels provided by school meals so that recommendations provide minimum, as well as maximum standards for calories, over a 5-day period. Recommending meal patterns that reflect current dietary guidance and nutrition sciences is both logical and essential. Meal patterns, today, must address not only inadequacies but also excesses seen in current consumption patterns.

IOM’s sensitivity to food insecurity is to be commended. SNE agrees with IOM that changes in school meals alone cannot fully eliminate dietary inadequacies and food insecurity. To meet daily goals for food and nutrient intakes, the quality of non-school foods will need to improve. SNE suggests that IOM strongly consider the role that food and nutrition education of parents, caregivers, and students can play in helping to facilitate improvements in the non-school food and nutrient intakes.

3. Examining various approaches to menu planning so that the recommendations for revisions can be effectively incorporated into the requirements for the meals.

SNE appreciates IOM’s proposal to emphasize a food-based approach, using school meal food targets supplemented with specific nutrient targets such as for sodium, fats, and added sugar. Currently, the meal requirements and planning approaches are complex and often difficult to understand and implement at the local level. The average school district has had trouble determining which one of the more than five approaches to meal planning to follow. SNE recommends efforts to simplify the meal requirements and menu patterns. These efforts should provide some flexibility to meet unique student needs and respond to a wide diversity, as well as cultural diversity, in local school food service and food system infrastructures.

4. Applying the criteria from the report in developing recommendations. This will include sensitivity analysis to examine nutritional impacts of the recommended revisions and addressing cost implications and market effects of the recommended revisions.

SNE believes the IOM should carefully consider and articulate the fiscal repercussions of implementations of any changes. Specifically, SNE believes the IOM should recommend funding to help school districts make these changes at the local level. As identified in the Phase I report, there will be potential cost increases associated with changing meal patterns and food items. This is a major concern for school districts, most of which must run self-sufficient, revenue neutral food service operations. Although the report indicates that efforts will be made to develop economical and practical recommendations, in the current reality of increasing food costs this could be a nearly impossible task without increased funding.

Funding at the federal, tribal, and state level should also support technical assistance and monitoring. Currently, each school district is monitored every 5 years. These monitoring visits are sometimes one of the main on-site trainings schools receive. SNE strongly encourages

recommendations to support extensive evaluations of any proposed revisions. Besides the rising cost of food, there will be costs related to staff training at the state and local levels in order to understand and implement new requirements. Provision of higher quality, more nutrient-dense meals in schools will likely require a higher level of food skills among the food service staff. USDA needs to be prepared to dedicate funding and staff time to provide training and technical assistance to states as they learn new systems and train local food service staff. In addition, a baseline must be established for infrastructure and equipment needs in cafeteria facilities to enable preparation of high quality, nutritious meals for children.

Analyzing cost implications on currently available USDA foods and other food products is important. Likewise, efforts should be made to work with the food industry to develop products that will be affordable, acceptable to students, and in line with new recommendations. An example cited is eliminating flavored milk in order to lower sugar intake. This could have the effect of also lowering milk consumption and thus calcium intake. The question arises—would it be possible for the food industry to develop a flavored milk product that is lower in sugar (without the use of artificial sweeteners) and less sweet? Or, are there other, non-milk calcium-rich foods that are readily available and affordable to schools? So many foods preferred by children are very sweet, yet we know that we can learn to like, and even prefer, foods that are less sweet.⁴

SNE believes the IOM should recommend involving students in the decision making process. Supporting nutrition education efforts in the classroom in conjunction with these school meal changes will increase the acceptance of new products and menus. Industry input will help facilitate the development of new, healthier products and portion options.

Conclusion

Improving school meals, while complex, is important in addressing urgent child health issues. The demand for change in nutrition standards and meal requirements in school meal programs is rippling at the local level as a result of the wellness policies. The majority of states are considering or adopting policies targeting the school food environment, from farm-to-school, school gardens, to healthy vending. State policies provide innovative examples of how small changes in the school food environment can be accomplished, but also illustrate how the absence of a national standard can create dietary disparities among our nation's children. Local and state level school food environment endeavors (or lack thereof) draw further attention to the need for expertise in guiding school nutrition standards. The Obama Administration, with strong support in Congress, has expressed interest in making significant changes in school meal programs while reauthorizing Child Nutrition programs this year.

SNE believes IOM has an opportunity to make meaningful changes in the meals over 28 million of our nation's children consume on a daily basis. We appreciate IOM's invitation to provide comments on this process and consideration of our suggestions. SNE is willing to help in any way we can.

⁴ Drewnowski, A. Taste Preferences and Food Intake. *Annu. Rev. Nutr.* 1997. Vol. 17: 237-253.