

National Alliance for Nutrition and Activity

January 24, 2006

The Honorable Mike Johanns
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250

Dear Secretary Johanns:

Congratulations on the excellent *Dietary Guidelines for Americans 2005* developed by the U.S. Department of Agriculture (USDA) and the U.S. Department of Health and Human Services. We look forward to working with you to help Americans follow this strong, science-based nutrition advice.

We are impressed by the improvements made in school meals over the last decade. The efforts led by the USDA and school food service and nutrition professionals have been vital in providing children with more nutritious meals. To continue these great strides and to protect children's health, we urge the USDA to move quickly to develop and propose regulations to apply the new *Dietary Guidelines* to the school meal programs in a cost-effective manner. Updating the school meal regulations is timely as school districts start to implement their local wellness policies, which may address school meals, as well as physical activity and foods sold outside of school meals.

To help schools meet the Congressional requirement that school meals meet the *Dietary Guidelines*, we recommend that the USDA update its nutrition standards for school meals as described below. We recognize that it may be necessary to phase in some of the recommendations, such as limiting sodium content and adding more whole grains in order to facilitate acceptance of new foods by children. Also, we recommend that the USDA continue to work with commodity processors and the food industry at large to encourage reformulation of products for food service to help schools meet the *Dietary Guidelines*.

- **Whole Grains.** At least half of the served grains in school meals should be whole grains (*i.e.*, either at least half of grains served should be 100% whole grain, all grains served should be at least 50% whole grain, or some combination of those options).
 - A “whole grain” should be defined as a food in which 100% of the flour or grain ingredient is whole grain.¹

¹ The Food and Drug Administration does not specifically define whole grains (except for whole wheat bread, which must be 100% whole grain). Rather, it sets a minimum amount of whole grain (51%) for products which can make a whole-grain claim. That minimum standard is not appropriate to use as the definition of whole grains for school meals.

For more information, contact any NANA member organization or Margo G. Wootan, D.Sc.,
at 1875 Connecticut Avenue, NW, Suite 300, Washington, DC 20009,
Phone: 202-777-8354, FAX: 202-265-4954, E-mail: mwootan@cspinet.org.

- Including whole grains rich in fiber and magnesium also will help schools meet fiber and magnesium target levels for meals. (Fiber and magnesium are listed as nutrients of concern for children and adolescents in the *Dietary Guidelines*.)
- **Fruits and Vegetables.** In all menu planning options, schools should serve, at a minimum, two servings of fruit and/or vegetable per breakfast and three servings of fruit and/or vegetable per lunch. (Serving sizes will vary based on age/grade.) Schools shall offer at a minimum five different fruits and five different non-fried vegetables over the course of a week to help ensure variety. At either breakfast or lunch, only one serving of fruit or vegetable should be juice.
 - For Nutrient Standard Menu Planning and Assisted Nutrient Standard Menu Planning, we recommend rescinding the current side dish requirement and replacing it with the requirement above that schools serve two servings of fruit and/or vegetable per breakfast and three servings of fruit and/or vegetable per lunch.
 - Schools should include some fruits or vegetables rich in potassium, fiber, and magnesium to help meet target levels for those nutrients for school meals. (Those nutrients are listed as nutrients of concern for children and adolescents in the *Dietary Guidelines*.)
- **Sodium.** In order to help students not exceed the 2,300 mg daily tolerable upper intake level for sodium recommended in the *Dietary Guidelines*, we urge the USDA to require that a school lunch contain no more than 770 mg, one-third of the daily limit, of sodium, and that a school breakfast contain no more than 575 mg, one-quarter of the daily limit for sodium.
- **Fats.** We recommend updating the regulations related to the fat content of school meals to reflect the 2005 *Dietary Guidelines* as follows:
 - Total fat should contribute 20-35% of the total calories.
 - Saturated plus trans fat combined should provide no more than 10% of total calories. (We recommend a combined target to help ensure that efforts to decrease trans fat do not result in increases in the saturated fat content of foods, and vice versa. The total amount of cholesterol-raising fats should be kept low.) In addition, trans fat should be kept as low as possible by adopting purchasing standards and preparation techniques that minimize its presence.
- **Calories.** We recommend the following guiding principles for determining calorie levels for school meals:
 - Energy standards for the School Lunch and Breakfast Programs should reflect our best information about optimum nutrition for children. The 2005 *Dietary Guidelines for Americans*, which are based on the updated Dietary Reference Intakes (DRI's), should be used as the basis for determining calorie levels for school meals.

- School meal programs are nutrition promotion programs and, as such, should model appropriate portion sizes, calorie levels, and healthy choices from the food groups. All children need balanced, nutritious meals. School meals are an important means of both providing nutrition to children and addressing food and nutrition insecurity. The school meal programs are especially important for low-income families because of their limited budgets.
- Calorie levels should be evaluated within the total context of all the nutrition guidelines that are applied and the overall changes being implemented in nutrition standards for school meals. Calorie standards should not compromise other nutrition standards (e.g., fat and saturated fat levels; provision of fruits, vegetables, and low-fat milk).
- Satiety and attractiveness of the meals, which are important to encouraging children to eat healthful meals, should be considered as USDA sets caloric standards.
- The calorie standards should take into account the typical age groupings in schools as a whole, and the ages/grades of children served within each school meal period. In the future, USDA should work with Congress to revise the age/grade groupings for meals planned through the traditional food-based menu planning method to more closely reflect the age/grade groupings of most schools.

Recommended Calorie Levels for Meals:

- Taking in consideration the above principles, we recommend setting the calorie standards as a range, rather than as specific target numbers.
 - Providing an acceptable calorie range for breakfast and lunches would allow schools to balance efforts to reach a specific calorie number with other nutrition goals, such as the nutrition profiles and amounts of foods (and meals) served; healthful purchase decisions and preparation techniques at the school food service level; limiting saturated and trans fat; and the attractiveness and appeal of meals offered.
 - Setting the calorie standard as a range would also better take into consideration what we know about actual consumption of school meals (including the impact of offer vs. serve, plate waste, and other related issues).
- We propose selecting the “moderately active” calorie levels in the *Dietary Guidelines for Americans* and *Dietary Reference Intakes*, to reflect the current activity levels of the majority of American children. According to 2003 Youth Risk Behavior Survey data, 67% of students had participated in either sufficient vigorous physical activity or sufficient moderate physical activity during the week preceding the survey.

- Hence, we recommend the following calorie ranges for meals planned through traditional food-based menu planning:
 - *Breakfast, Grades K-12:* 400-700 calories
 - *Lunch, Grades K-6:* 460-730 calories
 - *Lunch, Grades 7-12:* 530-920 calories

Working within these ranges, schools should take into consideration the typical ages within the school and within meal periods. In food-based menu planning, the amounts of foods are prescribed, thus reducing the importance of exact caloric requirements. Ranges provide greater flexibility to implement other recommended changes to the nutrition standards, such as increasing fruit, vegetable, and whole grain offerings.

- We recommend that schools using nutrient-based menu planning use age/grade groupings that are common in their school or school district, such as grades K-5, 6-8, and 9-12, rather than grade groupings, such as K-12, that are rarely found in schools.

We recommend the following calorie ranges for meals planned through nutrient-based menu planning:

- *Breakfast, Grades K-5:* 350-550 calories
 - *Breakfast, Grades 6-8:* 400-550 calories
 - *Breakfast, Grades 9-12:* 500-700 calories
 - *Lunch, Grades K-5:* 460-730 calories
 - *Lunch, Grades 6-8:* 530-730 calories
 - *Lunch, Grades 9-12:* 660-920 calories
- **Added Sugars.** We recommend that schools begin to assess the added sugars content provided in school meals as a first step in developing appropriate added sugars quantitative goals. We are aware of the potential difficulty school food service providers would face in implementing a quantitative limit on added sugars for school meals, since added sugars are not listed on food labels. Therefore, to enable school food service providers to meet this requirement, we recommend that the USDA require food manufacturers to make information regarding the added sugars content of their products available if they want to sell their foods to schools.

One means of providing that information might be for the USDA to update the regulations for the Child Nutrition (CN) Labeling Program to reflect the maximum contribution that added sugars should make to meal patterns and therefore, ask that food manufacturers provide information on added sugars content in order to qualify for a CN label. The types of food products eligible for CN Labeling also would need to be expanded (from the current meat, meat alternate, and minimum 50% juice products) to include other sweetened beverages, sweetened dairy products, and grain products including cereals, cakes, cookies, and pastries. In addition, the USDA should work with the Food and Drug Administration to include information regarding added sugars on packaged food labels.

The end goal is to limit added sugars in school meals to the amount listed in the USDA Food Guide in the *Dietary Guidelines*. However, we recognize that several steps need to be taken before establishing those levels as quantitative goals. By the beginning of the 2009-2010 school year, the USDA should establish a quantitative limit on added sugars for the school lunches and breakfasts, after taking the initial steps suggested above.

- **Milk.** Given that the new *Dietary Guidelines* recommend consumption of low-fat and fat-free milk, all fluid milk served with school meals should be low-fat (1% or ½%) or fat-free.
 - We also recommend that the USDA encourage schools to simplify the parental request process regarding fluid milk substitutions, such as calcium-fortified soy beverages or lactose-free milk. For example, this could be done by including space for indicating fluid milk substitute requests in eligibility forms for free or reduced-price meals.
 - We recommend that the USDA encourage schools to offer lactose-free milks with school meals in schools in which a substantial proportion of parents request lactose-free milk for their children.
- **Vitamins and Minerals.** Currently, lunches are required to provide one-third of the daily recommended dietary allowance and breakfasts are required to provide one-quarter of the daily recommended dietary allowance for protein, fiber, iron, calcium, fat, saturated fat, vitamin A, and vitamin C at appropriate levels for ages/grades. Given the nutrients of concern identified for children and adolescents in the 2005 *Dietary Guidelines*, we recommend updating the school meal nutrition standards to require schools to provide one-third and one-quarter in lunches and breakfasts, respectively, of the Dietary Reference Intake for appropriate age/grade levels for fiber, vitamin A, vitamin C, calcium, iron, potassium, magnesium, and protein.
 - We recommend that schools serve some vitamin E-rich foods each week.
 - USDA should update its regulations to add a requirement that schools analyze the levels of fiber, magnesium, potassium, and vitamin E in school meals, since those nutrients were found in the *Dietary Guidelines* to be nutrients of concern for children and adolescents.
- **Accountability.** To facilitate the implementation and evaluation of USDA's updated regulations to reflect the new *Dietary Guidelines*, we urge the USDA to make the following changes to the current school meal accountability regulations. The USDA should require that at least *two* schools be reviewed per school district during each review cycle; the schools should include at least one primary and one secondary school. For large school districts, more schools should be reviewed as needed to ensure that the full breadth of menus offered throughout the district is reviewed. The USDA also should expand the review process to include breakfast among the review requirements. In addition, the USDA should require states to establish a mechanism for informing the public about the results of the review and any corrective actions taken. Finally, while states are required to

monitor how well school districts meet the USDA's nutritional standards, the use of simple averages (as allowed by current law) can yield inaccurate assessments of the nutrition delivered by school meals. The USDA should encourage states to use weighted averages in monitoring school districts' compliance with the USDA's nutritional standards and work with Congress to implement a weighted averages policy.

Thank you for your consideration of our recommendations. We look forward to working with you to continue to improve the nutritional quality of school meals.

Sincerely,

Advocates for Better Children's Diets

America Walks

American Cancer Society

American College of Preventive Medicine

American Diabetes Association

American Dietetic Association

American Heart Association

American Public Health Association

American School Health Association

American Society of Bariatric Physicians

Association of State and Territorial Public Health Nutrition Directors

California Center for Public Health Advocacy

California Food Policy Advocates

Center for Informed Food Choices

Center for Science in the Public Interest

Community Food Security Coalition

Community Health Partnership

Consumer Federation of America

Council of State and Territorial Epidemiologists
Department of Health and Wellness, University of North Carolina-Asheville
Directors of Health Promotion and Education
Florida Introduces Physical Activity and Nutrition to Youth, Inc.
The Food Trust (PA)
FoodChange
George Washington Cancer Institute
HealthyPlanet
Institute for America's Health
Kids First
Maryland Healthy Eating and Active Lifestyle Coalition
Muskegon Community Health Project (MI)
National Association of Chronic Disease Directors
National Association of Pediatric Nurse Practitioners
National PTA
National WIC Association
New York City Nutrition Education Network
New York Coalition for Healthy School Lunches
New York State Nutrition Council
North Dakota Dietetic Association
Nutrition Council of Oregon
Obesity Action Coalition
Operation Wellness, Ball State University

Parents' Action for Children

Prevention Institute

Preventive Cardiovascular Nurses Association

Produce for Better Health Foundation

Produce Marketing Association

Researchers against Inactivity-related Disorders

Samuels and Associates

Stark County Health Department (OH)

Strategic Alliance for Healthy Food and Activity Environments

United Fresh Fruit and Vegetable Association

Upstream Public Health

U.S. Apple Association

U.S. Water Fitness Association

Washington State Association of Local Public Health Officials

Yale Prevention Research Center