



Proposed Principles, Criteria and Approaches to Revise Nutrition Standards and Meal Requirements: Phase I Report

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Committee on Nutrition Standards and Meal Requirements in the National School Lunch and Breakfast Programs

Good morning. My name is Matthew Sharp. I work with California Food Policy Advocates in Los Angeles.

California Food Policy Advocates is a statewide nonprofit organization whose mission is to improve the health and well being of low-income Californians by increasing their access to nutritious, affordable food. Hunger and obesity coexist for nearly one-third of low-income households in Los Angeles County, so we are concerned about students' inadequate and excessive intakes of food, nutrients and calories. School meals are the cornerstone of the nation's policy response to this paradox since the programs deliver valuable benefits to families, improve children's diets and establish long-term nutrition habits.

In Los Angeles I have had the opportunity to assist with the development and implementation of cutting-edge policies to improve student nutrition since the late 1990s. The Board of Education adopted several landmark resolutions to implement concepts from the DGA's in 2005. For example, sodium is limited to 1100 mg per meal, added sweeteners have been subtracted from breakfast meals, entrees higher in saturated fat have been significantly modified or eliminated, nutrient-dense vegetables are more widely offered, breads are at least 51% whole grain, and all the recipes have been updated to improve taste, appearance and student acceptance. Along with restrictions to competitive foods, facilities upgrades and attention to signage, marketing and staff training, these modifications have contributed to an 11% participation increase among middle and high school students. When combined with elementary increases, an additional 43,000 students ate reimbursable meals daily in 2008. Given declining school enrollment, this is a remarkable achievement. If you give them nutritious meals in a good, attractive setting, they will come.

CFPA advocates to expand participation in the child nutrition programs. We have also led efforts in Sacramento to establish state-level policies to add fresh fruit to each school breakfast (which led to a 136% increase in fruit selected in cafeterias) and to ban added trans fats and certain types of fried foods. This year we are sponsoring a series of initiatives to improve child care nutrition.

I am here today to share a few reactions to the Phase I report.

Perspective on Phase I Report

CFPA applauds the sound rationale and evidence base used to develop each component of the Phase I report. It is an excellent report, and we congratulate you. But, I wouldn't be a good advocate if I flew all this way and didn't share a few suggestions for strengthening the report, in line with the committee's current thinking.

It is worth underlining that complementary, parallel revisions are needed in areas outside the committee's jurisdiction. These are worth acknowledging because of their significant impact upon what students actually eat:

- *Legislative and cost constraints* (thoroughly described in CSPI's testimony, so I will simply say, "Me too!") For example, the calorie minimums in statute and fat maxima in SMI result in the addition of unnecessary caloric sweeteners to achieve compliance. This, and other legislative fixes should be noted when they inhibit applying the principles and criteria to sensible revisions.
- *Competitive foods*. If the committee wants the reimbursable meals to matter, the school environment is critical. Significant restrictions on competitive foods and beverages in Los Angeles in 2003 and 2004 led to the attention to cafeterias and support for all the improvements currently underway. The IOM's report on this topic ought to be referenced visibly in this committee's work, as fewer competitive foods will directly lead to better lunches.
- *Monitoring and enforcement* must be reviewed and strengthened by USDA, of course. The committee should indicate its support for enhanced attention to compliance, in order to increase the likeliness that the committee's recommendations change children's behavior soon.

Suggested Edits to Principles

- We recommend that the Committee broaden principle 2 (a) to address the public health threat facing so many students: "School meals should assist children to develop long-term habits to protect against diet-related disease and excess weight gain." This is critical to emphasize because the improvement of nutrient intakes at school (the core of the principle, as written) might be accomplished on paper without teaching the essential long-term habits associated with eating according to the DGAs.

For example, children’s nutrient intakes may be improved with 51% whole grain corn dogs and *baked* french fries, but the behavioral lesson is that modified fast foods are part of a healthy diet. In most students’ home and neighborhood food environment, nuggets, fries and nachos are not prepared according to school specifications and don’t promote the DGAs.

- We suggest that you consider that 3 (b) “Improving image and appeal” will result from, in part, improved nutrition. This is not a challenge, as stated in the principles, but an opportunity that will emerge from the committee’s recommended revisions, and subsequent publicity of those revisions.

For example, participation in Los Angeles increased *because of* attention to image and appeal. Updating recipes and trainings with the executive chef, marketing of the good-for-you standards to students, teachers and parents, and a significant dose of attention to access barriers, such as long lines, facilities and competitive foods contributed to LAUSD’s explosive expansion of meal participation.

Suggested Edits to Criteria

#1. Consider augmenting the first criterion to add, “...and *applied* to improve children’s diets by ultimately changing foods *selected* (and not simply accepting all the items that appear on the menu as entitled to equal value regardless of their selection by students). Developing nutrition literacy among students is the more widely favored approach to improve students’ behavior in selecting balanced entrees, but nutrition education is unlikely to be conducted on the scale that this the challenge demands. Menu planning must be adjusted to change what students select – often this means the elimination of the fast food-lite items.

For example, impressive changes have been made to the menus in Los Angeles, including more vegetarian entrees, salads and simple sandwiches. Nonetheless, a recent CFPA plate-waste study revealed that, despite significant efforts to attract students to try more vegetable-based entrees and side dishes, on the days when Hot Wings are served, 800 portions were selected by the students, compared to only a few dozen salads. The end-user behaviors should be a focus of Criterion #1.

#3. Simplification of planning and monitoring processes should also achieve higher rates of compliance with Nutrition Standards and Meal Requirements. Obviously, simplicity is a worthwhile outcome since red tape is no one’s friend. But, as discussed extensively in the Phase I report, USDA’s SNDA-III shows NSLP and SBP do not comply with SMI requirements. Of particular concern are excess saturated fat and sodium in school meals – also noted in the evidence as excessively prevalent in children’s diets. Simplification of planning and monitoring should also increase

compliance with the standards and requirements. This merits explicit mention in criterion #3.

#4. Cost sensitivity should incorporate - or at least, reference – the potential cost of inaction. There is sound economic basis for estimating that no change in school meals (the federal government’s only nutrition education program that reaches more than 30 million children and youth daily) will eventually show up as massive costs to the Treasury in long-term health expenses associated with obesity. California’s Obesity Prevention Plan explains investments in student nutrition as small, preventive expenditures essential to reducing the rate of increased health care costs that are directly associated with excess calorie intake and inadequate physical activity.

Suggested Edits to Proposed Approach

The proposed sensitivity analysis to estimate market effects and cost implications 4(b) should consider the broader benefits of the food industry’s eventual adjustments to accommodate changes in the \$11 billion school meals marketplace. The analysis should estimate the potential beneficial effects that changing school food procurement practices will have for consumers by potentially improving the availability and affordability of food products that promote adherence to the Dietary Guidelines for Americans.

CFPA recently completed an analysis of the commodity program in California, which included extensive data analysis, interviews with processors, school food authorities and administrators. We concluded that industry will respond to changes in customer demand. Vendors will offer the products. Los Angeles Unified has already driven many of these changes in Southern California through its bid specifications to acquire 51% or more whole grain breads, low-sugar breakfast items and a range of lower-saturated fat entrees. These products are now more widely available to other school districts and commercial food services as the result of policy changes to begin implementing the DGAs.

In Closing.

Thank you for the opportunity to identify a few ways to strengthen your process for developing revisions to the National School Lunch and Breakfast Programs. The kids need different foods, will try different foods and, our experience shows, will welcome different foods. With careful implementation, the system can actually digest profound changes – and everyone comes out ahead.

I am happy to answer any questions you might have.