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**Comments of
School Nutrition Association President Becky Domokos-Bays, PhD, RD, SNS
Before the National Academies of Sciences, Engineering and Medicine
Committee to Review the Process to Update the Dietary Guidelines for Americans
January 10, 2017**

Thank you for the invitation to speak on behalf of the 57,000 members of the School Nutrition Association (SNA), who plan, prepare and serve school meals to more than 30 million students each school day.

Every year, more than 5 billion school lunches and 2.4 billion breakfasts are served to America's school children, and federal regulations mandate that all of these meals be prepared in accordance with the Dietary Guidelines for Americans (DGAs). Given this tremendous impact, SNA has emphasized that the DGAs cannot be influenced by personal bias, outside influence or unsubstantiated research. The DGAs must be based on sound science - peer-reviewed, published research specific to the age group, with a sufficient sample size to allow for generalizations to the intended population - especially in the case of decisions that impact K-12 school age children.

We greatly appreciate today's opportunity to discuss the DGAs' influence on school meals, but we strongly recommend that the Committee membership permanently include a school nutrition practitioner. School nutrition professionals have a unique perspective to offer – we are on the forefront of the effort to turn these Dietary Guidelines into lifelong dietary habits for future generations.

We have encountered a number of complexities and challenges firsthand in this mission that can inform the Committee's work in the future. As the Committee knows, the current dietary habits of most American families, as well as popular offerings in most American restaurants are not in line with the DGAs. As such, school nutrition professionals must encourage students to adjust their eating habits and preferences. It's more than just offering – we have to entice them to choose nutritious, well-balanced school meals, based on the DGAs.

We utilize many strategies to overcome these challenges – we modify kids' favorite menu items to make them more nutritious, and we use taste tests, chef inspired recipes and farm to school programs to encourage healthier choices. While we have made progress on this front, we do encounter resistance, especially when these efforts are not coordinated or replicated outside of the school setting.

School nutrition professionals also face challenges with the prescriptive manner in which the DGAs have been implemented in the federal school meal programs. Although the DGAs were designed as recommendations to guide Americans toward healthier habits, they have been applied as inflexible requirements for our programs. For example, the federal school meal mandate that every grain item offered at school must be at least 50% whole grain effectively prohibits the occasional consumption of white rice and other refined grains permitted under the DGAs.

Planning an appealing menu that balances strict calorie, fat and sodium limits and meets daily and weekly component requirements is a puzzle. Reducing the fat in a meal can create challenges in meeting minimum

calorie requirements. Assembling the puzzle pieces can yield surprising results. For example, total fat limits have forced healthy choices like hummus and guacamole off a la carte menus.

Strict sodium limits have been a particular challenge – especially for school meal programs that lack the equipment and labor to prepare meals from scratch. Many schools are limiting nutritious choices for students, in part due to naturally-occurring sodium present in healthy choices like low-fat cheese and milk. For example, some schools are cutting the number of entrée salads offered due to the sodium in popular dressings, limiting ethnic foods and reducing lean protein items at breakfast.

Virtually all schools have met the 2014 nutrient mandates, but as you can see, there have been a number of unintended consequences – and more challenges are on the horizon when future sodium targets take effect. In our rush to meet specific targets, we can lose sight of the bigger picture and the goal of gradually coaxing children, whose tastes are still maturing, to try new foods and make healthier choices.

In addition to meeting mandates, school meals must taste good, and we must appeal to increasingly diverse student tastes. Particularly at the high school level, where students have more alternatives to school lunch, school meal programs are forced to compete with restaurants and convenience stores. Menus must also be designed to be efficiently served to hundreds of students in a matter of minutes, given short lunch periods, while also accommodating a rising number of students with special dietary needs.

And of course, school meals must be prepared on an extremely tight budget. With the federal reimbursement rate for serving a free lunch just over \$3, schools are required to serve well-balanced, healthy school meals for less than what most of us paid for our morning coffee. Schools must cover labor and benefits, supplies, equipment, indirect costs and other expenses, leaving little more than \$1 to spend on the food for each lunch tray.

School Nutrition Association members are constantly working together to find solutions to all these puzzles, but there is no question that these challenges have contributed to the recent national decline in the number of students eating healthy school lunches. Declining student participation undermines the goals of the DGAs. Research consistently shows that school meals are more nutritious than food brought from outside the cafeteria and contribute to improved classroom behavior and achievement.

School Nutrition Association strongly supports maintaining robust federal nutrition standards for school meals. To address unintended challenges and to achieve the DGAs' goals, SNA is calling for modest changes to these regulations to provide flexibility for school menu planners. We need a little wiggle room to plan healthy menus that will convince students to choose nutritious school lunches and the fruits, vegetables and milk they include. SNA is also calling for increased funding to help school meal programs cover the cost of offering the whole grains and larger servings of fruits and vegetables recommended under the DGAs.

School nutrition professionals are proud to work alongside the DGA Committee, health and nutrition groups, parents and other advocates in promoting healthy lifestyles for children. As we all work together to achieve this goal, we want to avoid having the quest for the perfect diet become a roadblock to progress in improving our children's dietary choices.