



**Comments of**  
***School Nutrition Association President Lynn Harvey, Ed.D., RDN, LDN, FAND, SNS***  
**2020 Dietary Guidelines for Americans Listening Session**  
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Thank you for the opportunity to speak on behalf of the 57,000 members of the School Nutrition Association, who plan, prepare and serve nutritious, affordable, appealing school meals as important components of the instructional day.

Each year, America's schools serve more than 5 billion lunches and nearly 2.5 billion breakfasts to fuel students' success. Federal regulations mandate all these meals be prepared in accordance with the Dietary Guidelines for Americans (DGAs). Schools in economically disadvantaged communities increasingly operate as Nutrition Hubs, ensuring students have access to nutritious foods not only during the school day, but also beyond the school day. The DGAs also influence the nutritional requirements for afterschool snacks and suppers as well as meals provided during the summer months when school is not in session.

School nutrition professionals are the living cornerstones for all these programs, which serve more than 30 million students each school day, with the potential to reach more than 50 million students nationwide. We work on the frontlines every day to transform the recommendations from the DGAs into meals students will eat and enjoy while simultaneously teaching them lifelong healthful eating habits that will positively impact their future dietary practices.

Given this tremendous influence on children's long-term health and well-being, we strongly recommend the Dietary Guidelines Advisory Committee (DGAC) permanently include a school nutrition practitioner. We offer a unique and critical perspective on both the opportunities for continued achievement and advancement of the guidelines in shaping children's food preferences and ultimately their lifelong food habits. We provide a mechanism to report the successes achieved around the guidelines and, when needed, we can promote productive dialogue around the challenges encountered when applying the DGAs to the complex, highly-regulated school nutrition programs.

Unfortunately, as we all know, the DGAs do not mirror the current dietary practices of many American families. As a result, school nutrition professionals are tasked with the job of enticing students to make healthful food choices at school, when those choices are seldom reinforced in other settings. We have accepted this opportunity to help shape students' current and future food choices. And, we have made tremendous progress in this area by utilizing creative menu strategies, taste tests, farm to school programs and other nutrition education initiatives intended to promote the adoption of lifelong healthful eating habits. However, school nutrition professionals face challenges given the prescriptive manner in which the guidelines have been applied to the programs. The guidelines are intended to serve as recommendations to guide Americans toward healthier food choices, but in school nutrition programs, they have been implemented as inflexible mandates.

For instance, the occasional serving of white rice is permitted under the DGAs, but prohibited in schools under the requirement that all grains offered be whole grain rich. Planning an appealing school menu that balances strict calorie, fat and sodium limits and meets daily and weekly component requirements has become a complicated puzzle that yields unintended results. Total fat limits forced some healthy choices like hummus

and guacamole off the menu. Strict sodium targets have some schools reducing ethnic food options and limiting entrée salads due to the sodium content of popular dressings.

Our members are grateful USDA is working to provide schools flexibility under these rules to make meals more appealing to students. The rapid implementation of the school meal standards contributed to the decline in average daily participation in the National School Lunch Program. With research showing that school meals are more nutritious than ever and more nutritious than other alternatives, the drop in the number of students eating healthy school meals is a missed opportunity that undermines the goals of the DGAs. Including a school nutrition professional on the DGAC could help ensure the guidelines are consistent with goal of planning meals that achieve high nutrition standards, while simultaneously promoting student acceptance and enjoyment of school meals.

The DGAC must also be aware of the operational and budgetary constraints of school meal programs. School nutrition professionals receive just over \$3.00 to prepare a lunch that includes milk, fruits, vegetables, whole grains and a lean protein, all while covering the cost of staff salaries and benefits, as well as food, supplies and equipment to prepare those meals. To remain financially solvent and sustainable, school meal programs must appeal to diverse student tastes, accommodate special dietary needs and compete with a growing number of alternatives – from home packed meals to food trucks parked outside the school doors and fast food outlets located a few blocks away.

The members of the School Nutrition Association are proud to be partners in the national effort to promote a stronger, healthier America. We stand with you on the front lines to help promote the formation of healthful food habits among our children. We are uniquely positioned to partner with parents, teachers and communities to influence the food habits of children beginning in preschool programs and extending through high schools. We hope that by sharing the expertise of school nutrition practitioners, as part of the Dietary Guidelines Commission, we can work together to make these important guidelines a way of life in our nation.