



Feeding Bodies. Fueling Minds.™

March 30, 2018

Kristin Koegel
USDA Food and Nutrition Service
Center for Nutrition Policy and Promotion
3101 Park Center Drive, Suite 1034
Alexandria, VA 22302

Dear Ms. Koegel:

These comments are submitted on behalf of the 57,000 members of the School Nutrition Association (SNA) in response to the *Dietary Guidelines for Americans (DGA): Request for Comments on Topics and Questions* notice in the Federal Register on February 28, 2018. SNA's membership includes school nutrition professionals serving K-12 schools, college level academic instructors/professors in related fields, state agency personnel administering Federal child nutrition programs and other related professionals. As it is primarily the school population which SNA's members directly serve, the comments below are related to children and adolescents, ages 2-18 years old.

In response to the topic, *Dietary patterns to promote health and normal growth and meet nutrient needs*, and whether changes are needed to the USDA Food Patterns, daily meal service operations in schools serve as a laboratory to observe and evaluate child and adolescent consumption of the prescribed meal patterns. In schools participating in the federal child nutrition programs, most students have access to a breakfast and lunch prepared in accordance with the USDA meal pattern, based on the DGAs. In recent years, school districts have complied with changes designed to bring the meal patterns in line with the most recent DGAs. Some districts have faced difficulties as food products that meet those standards have not been readily available or in sufficient supply. In addition, student acceptability of some new food products that are different from what they consume at home has been quite challenging and resulted in an increase in food waste. Overall, with the responsiveness of USDA to create flexibilities through the transition, school nutrition operators have managed to implement meal pattern changes and align with the DGAs. However, the challenges schools have encountered should inform efforts to promote acceptance of the DGAs among the broader community.

As USDA and HHS consider changes to the USDA Food Patterns, the agencies should learn from shortcomings in how the theoretic guidelines have been implemented in the real-world school setting. For instance, USDA's school meal pattern requirements for whole grains are not currently consistent with the DGAs. Moreover, the current school breakfast meal pattern is high in carbohydrate content and absent of sufficient protein due to the lack of a required meat/meat alternate component and the mandate that an optional meat/meat alternate may only be credited once the daily grain requirement has been met. Given the important role of protein in growth, stabilizing blood sugar and promoting optimal uptake of glucose while sparing glycogen stores, USDA should consider cost-effective measures to better incorporate protein in the school breakfast meal pattern.

Resolving challenges with the crediting of meat/meat alternates in the School Breakfast Program would also help address concerns regarding *Added Sugars* in child and adolescent diets. More than 14 million

students consume a school breakfast each day. Typically, school food menu options, developed to meet meal pattern calorie caps, are lower in added sugars compared to similar retail choices. However, protein-rich school breakfast options are often lower in added sugars than these reduced-sugar grain-based choices.

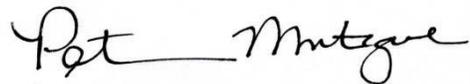
In reference to *Beverages (cow's milk, water, 100% fruit juice, sugar-sweetened beverages, milk alternatives, caffeinated beverages)*, the school setting offers an ideal laboratory to evaluate the successful adoption of the DGAs. With regulatory action stemming from the *Healthy Hunger Free Kids Act of 2010* and the resulting *Smart Snacks in School* rule, beverage options for children and adolescents in the school setting are limited. Unfortunately, the consumption of sugar-sweetened beverages outside of this setting has increased dramatically, and these sugar-sweetened choices too often replace water and milk, depriving children and adolescents of key nutrients. The DGAs should continue to promote calcium and nutrient dense beverage choices.

Over 95,000 schools participate in school meal programs, serving over 30 million children each day. School meals embody a living test case for applying the principles of the DGAs to the food choices of America's next generation. The school nutrition professionals who have served on the frontlines in the recent effort to align school meals with the DGAs have a valuable perspective on how to make the Guidelines successful for Americans. For reference, please see the attached comments of SNA President Lynn Harvey, RDN, LDN, FAND, SNS as part of USDA's 2020 Dietary Guidelines for Americans Listening Session (November 28, 2017) and of SNA Past-President Becky Domokos-Bays, PhD, RD, SNS, before the National Academies of Sciences, Engineering and Medicine, Committee to Review the Process to Update the DGAs (January 10, 2017). There are many school nutrition professionals with both strong academic credentials and in-depth knowledge of the complex day-to-day operations of the federal child nutrition programs. We hope USDA and HHS will utilize their expertise in the process of considering changes to the DGAs.

Sincerely,



Dr. Lynn Harvey, RDN, LDN, FAND, SNS
President



Patricia Montague, CAE
Chief Executive Officer

Attachments