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February 12, 2018

Angela Kline
Director
Policy and Program Development
Child Nutrition Programs
Food and Nutrition Service
P.O. Box 66740
Saint Louis, MO 63166-6740

Dear Ms. Kline:

On behalf of the 57,000 members of the School Nutrition Association (SNA), we appreciate this opportunity to comment on the December 14, 2017, *Federal Register* Notice, Request for Information, “Food Crediting in the Child Nutrition Programs: Request for Information.”

As USDA’s Food and Nutrition Service (FNS) considers improvements to the food crediting process, we urge you, first and foremost, to reduce complexities and strive for consistency in crediting across *all* the federal Child Nutrition Programs. The food crediting process must be nimble enough to evolve with the rapidly changing food landscape as school nutrition program operators address increasing demands for vegetarian, vegan and allergen-free options in school meals, as well as provide greater variety in choice to meet expectations of today’s young consumers. School Food Authorities (SFAs) have been hampered in these efforts by the overly-complex food crediting process and the long lag times in releasing related rules and/or guidance.

Recent examples include the length of time it took to permit the crediting of yogurt, as well as the unnecessarily convoluted rules established for crediting smoothies. In addition, SFAs committed to aligning their menus with the new nutrition standards of the Healthy, Hunger-Free Kids Act (HHFKA) waited nearly *three years* after their own implementation deadline for the release of the updated Food Buying Guide, an essential food crediting resource.

SNA recommends FNS include a representative group of school nutrition program operators in any organized effort to review crediting procedures. Such a group can provide insight into the many operational challenges encountered in the crediting process and identify areas where FNS can develop improved or additional resources.

Consider, for example, the expectation of cafeteria cashiers to quickly review the menu items on a student’s tray, calculate equivalencies and identify a reimbursable meal—sometimes at a rate of 20 student trays a minute! This is particularly challenging under complex crediting rules, especially those



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for combination foods, such as pasta dishes, as well as for sites using salad bars and other self-serve options to increase consumption of healthier choices, while reducing waste.

SNA would also like to submit the following comments in response to specific questions raised in the Request For Information (RFI):

FACTORS TO DETERMINE CREDITING:

Is it appropriate to continue to credit foods based on the volume or weight served, with the few exceptions discussed above? Crediting based on volume or weight is appropriate, with the noted exceptions, as this basis mirrors the Healthy U.S.-Style Eating Pattern recommendation for consumption of foods in cup equivalents, as cited in the *Dietary Guidelines for Americans (DGA)*.

Should fortification play a role in determining if and how a food is credited in Child Nutrition Programs? No, fortification should not play a role in determining if and how a food is credited. SNA supports the current practice of grouping foods with similar nutrients, as recognized by the DGAs, the MyPlate campaign and the general public. This practice is consistent with the Food Based Menu Planning approach and longstanding nutrition education efforts. Allowing fortification to impact crediting could hamper efforts to educate students on how to plan balanced meals.

Is the presence of certain nutrients more important than other nutrients when determining if and how a food credits in Child Nutrition Programs? As addressed in the DGAs, eating a balanced diet by consuming a wide variety of foods is the best way to ensure students get the nutrients they need. While we should remain cognizant of targeted nutrients of concern (such as Calcium, Iron, Vitamins K and D, etc.), providing variety and student choice helps promote a balanced diet. Each school meal component contains critical nutrients, and research has shown consumption of school meals improves students' dietary intake.

Is it appropriate to continue to consider the customary use of a product when determining how a food credits in Child Nutrition Programs? The basis for crediting should be consistent. If nutrient content is the basis for establishing crediting, then items like popcorn could be credited as a grain component (providing the serving size is adequate). In light of changing food preferences, menu planners should have the option to use *any* available item on a menu, so long as it meets nutritional requirements. Items that are customarily considered "snacks" can still be part of a nutritious meal.

What role should such educational considerations play in determining the creditability of a food in Child Nutrition Programs? If a food credits based on a range of nutrients, it should be credited in *all* its various forms. The updated meal pattern and vegetable variety requirements will ensure students continue to be exposed to a wide range of nutritious foods, while simultaneously enabling them to learn the components that comprise a balanced diet. As student populations become increasingly diverse, schools are expected to serve a wider range of options, including ethnic dishes that feature sauces or soups that incorporate a wide range of hard-to-recognize ingredients. Schools should be able to credit



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fruits, vegetables, grains and meat/meat alternates in *all* of their forms, as long as they meet nutrient and meal pattern requirements.

Are there other factors FNS should consider in determining how foods credit in Child Nutrition Programs? FNS *must* consider how food crediting rules impact the Point of Service for school meal programs – specifically, the severe time constraints cashiers face in determining whether a meal is reimbursable. In lieu of adding convoluted layers to the crediting process, FNS should consider the impact further complexity would have on staff training requirements and costs, as well as on student time in line and school meal participation.

FOODS FROM THE MEAT/MEAT ALTERNATE COMPONENT:

Per the RFI's questions regarding shelf-stable, dried or semi-dried meat; poultry; and seafood snacks and surimi, some SNA member programs are offering dried meat and jerky options for sale a la carte. In some cases, they accompany the meal and support program participation.

Dried meat/meat alternate options are popular with students. These shelf stable items are ideal for summer meals, field trips and snacks. They are often high in protein and offer ease of service. If these options have a standard of identity and can fall within the prescriptive meal pattern limits for sodium, calories and fat, then FNS should allow them to be credited in a similar fashion to other protein items, with consideration given to the range of nutrients per serving. Expanding menu options helps to increase student participation in school meal programs and exposes students to a wider range of nutritious choices.

Regarding the RFI's inquiries on high-protein yogurt, a number of SFAs participated in the USDA Foods yogurt pilot program with great success. It's important to note that some districts sell high-protein yogurt only on an a la carte basis, as its higher cost usually makes it cost-prohibitive at the required serving size for a reimbursable meal. Crediting of high-protein yogurt should be consistent and simple: 1 ounce of yogurt should be equivalent to 1 ounce of any other meat/meat alternate; many programs serve multiple yogurt options, and it would be difficult for cashier staff to quickly differentiate among these at the busy Point of Sale. If a thickening agent is used, however, and, as a result, the product does not contain the minimum quantity of protein, it should be *disqualified* from crediting. High-protein yogurt is a nutritious, versatile and student-approved food. Without thickeners, it meets the needs of vegetarians. Allowing high-protein yogurt to credit 1 ounce to 1 ounce would expand healthy options in school meal programs.

OTHER FOODS NOT CURRENTLY CREDITABLE:

School nutrition program operators currently offer a variety of non-creditable items as extras or for sale a la carte. These include popcorn, low-fat vegetable chips, lean turkey bacon, low-fat pudding and tempeh (to meet vegan requirements). FNS should carefully review all non-creditable items. If an item meets nutrition standards in a reasonable portion size, FNS should consider permitting these foods to be credited for the Child Nutrition Programs. Excellent examples include popcorn (a naturally whole grain



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snack) and tempeh (a protein-rich meat alternate). Additional menu options available for reimbursable snacks and meals would appeal to both operators and the students they serve.

In closing, SNA reiterates its recommendation that FNS include state- and local-level child nutrition practitioners in its process for determining future decisions and applications regarding food crediting in the federal Child Nutrition Programs. SNA is more than willing to assist FNS in identifying practitioners to help in this effort.

Sincerely,

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

Patricia Montague, CAE
Chief Executive Officer