



Feeding Bodies. Fueling Minds.™

# 2020 Dietary Guidelines Advisory Committee Meeting 2

July 11, 2019

*Remarks of Dr. Becky Domokos-  
Bays*



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Good morning,

I am Dr. Becky Domokos-Bays, a Registered Dietitian Nutritionist and recently retired Director for Loudoun County Public Schools in Virginia. As a past president for the School Nutrition Association, I am pleased to comment on behalf of the Association's 58,000 members, who work every day on the frontlines to plan, prepare and serve healthy meals at school that fuel student success.

We invite the Committee to visit our school cafés—they are the best places to see how the DGAs are shaping children's current and lifelong eating habits. Each year, in schools across the country, school nutrition professionals and paraprofessionals provide approximately five billion lunches and two and a half billion breakfasts, as well as dinner, snacks and summer meals to America's students.

Federal rules require these meals to be prepared in accordance with the DGAs. For the most part, recently updated school nutrition standards have been a tremendous success. Students select meals that provide age appropriate calories and expose them to a wide variety of fruits, vegetables, whole grains, lean protein and dairy options they might not otherwise experience. School nutrition professionals take pride in our role in combatting childhood obesity and teaching children about nutritious choices.

However, the Committee should be aware that implementation of the DGAs in school nutrition programs has also presented challenges. The 2015 edition of the DGAs states "the guidelines embody the idea that a healthy eating pattern is not a rigid prescription, but rather, an adaptable framework in which individuals can enjoy foods that meet their personal, cultural, and traditional preferences and fit within their budget."

In practice, today's school nutrition standards, based on the most recent edition of the DGAs, are extremely complex and have proven to be overly prescriptive for schools. Implementation of the DGAs has been challenged by many factors, top among them limited funding, inadequate equipment or facilities and increasing labor costs where schools are often challenged to recruit and retain skilled personnel. Students seldom have time to consume their meals at school, thus contributing to wasted food.

Planning appealing, nutritious school menus that balance strict calorie, fat and sodium limits, while meeting daily and weekly component and item requirements is like assembling an elaborate puzzle. This complexity complicates our basic mission of feeding children healthy meals. Schools must follow different meal patterns for breakfast, lunch, snack, supper and summer meals. Each of these meal patterns have varying requirements for different grade or age groups.

Meanwhile, entrees and sides sold a la carte must meet still different, equally complex Smart Snacks standards, also meant to reflect the DGAs. While school nutrition standards limit *saturated* fat, Smart Snacks limits *total* fat to 35% of calories or less. As a result, heart-healthy foods rich in unsaturated fats, like guacamole, hummus and vegetables tossed in olive oil, are prohibited on a la carte menus. Even a whole grain turkey sub with ½ ounce of cheese fails to meet Smart Snacks rules.



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Multiple sets of standards drive up costs for school nutrition programs, both in food and resource allocation. School nutrition is a narrow niche in the food supply chain; production of food items that must meet varied standards is a burden. Distributors struggle to maintain stock of specialty items that only schools are willing to purchase, leaving small and rural schools with limited access to a full line of items that meet all the standards and appeal to students.

In addition, overly prescriptive standards, implemented too quickly in the school setting, contributed to the decline in student meal participation. Two million fewer students each day receive a healthy school lunch since updated standards took effect, an unfortunate loss in light of research showing school meals are significantly healthier than lunches from home or elsewhere. We appreciate USDA's efforts to provide flexibility in the standards, allowing schools to occasionally serve refined grains and providing additional time to allow for personal, regional and cultural preferences to meet the second set of sodium limits. We believe these changes will result in more students consuming nutritious meals at school.

School meals should be consistent with the DGAs - we all want these meals and snacks to be healthy choices for students. But to succeed, the guidelines must be practical, affordable and achievable too. Foods provided to students must also taste appealing; otherwise, they won't eat them. Extreme limitations on sodium, nearly at therapeutic levels, have left students asking for more flavor in foods.

The School Nutrition Association welcomes further discussion on the DGA guidelines and their application to school nutrition programs. Working together, we believe we can help students enjoy meals at school, consume a variety of nutritious foods and develop eating habits that contribute to optimal health and well-being. We are proud to partner with the Committee to support healthful eating for all American students.