School meals are healthier than ever, and schools need more time to successfully implement USDA’s Target 2 sodium reduction goals:

- School meals are now the healthiest meals consumed, with more fresh fruits and vegetables, more whole grains and lean protein and less saturated fat and sodium, and these meals are getting better each and every day. A recent study shows school meals had the highest nutrition ranking among food consumed from grocery stores, schools, workplaces, restaurants and food trucks and entertainment venues.

- Virtually all U.S. schools met USDA’s Target 1 sodium reduction goals for School Year (SY) 2019–20. SNA and its members have successfully met Target 1 mandates and embrace Target 2 goals. Review USDA’s sodium reduction target timeline.

- An SY 2021–22 or SY 2022–23 enforcement date for Target 2 sodium reductions is unrealistic and uniform compliance is unachievable. Schools and suppliers need at least 24-36 months to create and test recipes and prepare foods and ingredients that meet the Target 2 standards and do so in a way that preserves palatability and program participation. Pandemic supply chain disruptions and shortages have significantly impacted this process.

The evidence shows USDA’s Final sodium reduction goals are unachievable and should be eliminated:

- USDA’s Final (Target 3) sodium reduction regulations are unachievable and will have drastic unintended consequences that disregard the overall nutritional progress accomplished in school meals in recent years. Serving foods and meals that meet the Final Target will cause issues with palatability, student participation rates, costs and foodservice operations.

- According to an SNA survey of its membership, only 11% of school nutrition directors anticipate being able to meet the Final Target. Seventy-four percent of respondents are extremely concerned about the impact of these limits on their programs, with a total of 97% expressing concern. Among the challenges to meeting future sodium limits, more than 95% of respondents cited product or ingredient availability, negative impact on student meal participation and naturally occurring sodium in foods such as milk, low-fat cheese and meat.

- Research confirms a massive drop-off of two million fewer students eating school-served lunches every day since the USDA’s nutrition standards went into effect. That’s a problem because healthier
food that goes uneaten is contrary to the nutrition goals as envisioned by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) and the USDA.

- The United States District Court has ruled student acceptance is legitimate criteria for developing reasonable, achievable sodium reduction policies for school meals.

- The National Academy of Medicine (NAM, formerly the Institute of Medicine) said, “reducing the sodium content of school meals as specified and in a way that is well accepted by students will present major challenges and may not be possible.”

- The Dietary Guidelines for Americans 2020–2025 recognize that sodium reduction is challenging, requiring a joint effort by individuals, the food and beverage industry, and food service and retail establishments (DGA page 102).

- The school meals Final Target is out of alignment with government standards for other nutrition programs, including WIC, SNAP and P-EBT.

- More research is needed to determine how the Final Target will impact students’ health over the long term. Many foods prepared under the Final Target are likely to be rejected by significant segments of the student population, creating a lost opportunity for most American school children to consume healthy food.

Conclusion

- USDA should work collaboratively with America’s school meals experts, school nutrition professionals serving nearly 30 million students a day, to benefit from their extensive experience in crafting healthy, appealing school menus for students in nearly 100,000 schools across the country.

- USDA should codify the agency’s previously issued July 2024 date for enforcement of Target 2 sodium reduction mandates to allow schools and their suppliers adequate time to develop and test the new recipes Target 2 requires and address persistent pandemic supply chain challenges.

- USDA should follow the science and eliminate unachievable Final Target sodium reduction mandates.

- USDA should encourage schools that are able to voluntarily reduce sodium content beyond Target 2 goals by sharing best practices and creating incentives for schools to continue to reduce sodium in school meals.