



Feeding Bodies. Fueling Minds.™

October 7, 2024

Janet M. de Jesus, MS, RD
HHS/OASH Office of Disease Prevention and Health Promotion (ODPHP)
1101 Wootton Parkway
Suite 420
Rockville, MD 20852

Dear Ms. de Jesus:

The non-profit School Nutrition Association (SNA), representing 50,000 school nutrition professionals nationwide, appreciates this opportunity to provide input to the 2025 Dietary Guidelines Advisory Committee (DGAC) as the Committee updates the *2020-2025 Dietary Guidelines for Americans* (DGAs).

School nutrition professionals offer a critical, firsthand perspective on the practical impact of the DGAs and the successes and challenges of putting these guidelines into practice in school cafeterias across the country. Every school day, these professionals serve nearly 30 million lunches and more than 14.5 breakfasts to students nationwide, all prepared in accordance with the DGAs. Many of these students depend on school meals as their primary source of nutrition.

Given the tremendous influence the DGAs have on the diets of America's school children, **SNA strongly recommends that the Committee membership permanently include a school nutrition practitioner.** Many school meal program directors are Registered Dietitians and School Nutrition Specialists – credentialed experts in the application of nutrition science in K-12 schools. The DGAC can benefit from the insight of those working on the frontlines to encourage students to try unfamiliar fruits and vegetables and adjust to entrees with less sodium and sugar. School nutrition professionals share the DGAC's goal of fostering lifelong healthy eating habits and have experience addressing challenges to implementing these guidelines across the complex federal child nutrition programs – including the money, time, equipment and labor needed to change menus and earn student acceptance of healthier meals.

The DGAs must be based on sound science - peer-reviewed, published research specific to the age group, with a sufficient sample size - especially as it applies to school aged children. But to be successful, the DGAs must also be achievable for short-staffed school meal programs operating on tight budgets, and customizable to the diversity of tastes and cultural preferences of the 50 million students reached by school nutrition programs.

Since passage of the Healthy, Hunger-Free Kids Act of 2010, school nutrition professionals have worked tirelessly to align their programs with the DGAs and improve the nutrition and quality of school meals. They have reduced sodium, calories and fat, introduced students to whole grain foods, a wider variety of fruits

and vegetables, and low-fat and fat-free milk. Thanks to these efforts, [research](#) shows Americans eat their healthiest meals at school.

However, as meals consumed in America's restaurants and at home are too often out of line with the DGAs, school nutrition professionals must continuously persuade students to choose healthy school meals and adjust their eating habits and preferences. When a meal is unfamiliar, frontline school nutrition staff have witnessed food-insecure children choose not to eat at all, while students with means may choose to eat less healthy options - all contrary to the goals of the DGAs.

School nutrition teams are passionate and creative in their efforts to make school meals more appealing to students. They have added culturally relevant foods, on-trend and customizable entrees and allergen friendly options to the menu. To increase fruit and vegetable consumption, they have implemented everything from farm to school programs to nutrition education initiatives and harvest of the month promotions.

Beginning in 2025, schools will phase in [long-term school nutrition standards](#), including new limits on added sugar and an additional reduction in sodium. Schools will face further challenges achieving compliance with the new rules and securing student acceptance for additional menu changes. **The current and future DGAC, as well as the U.S. Department of Agriculture, must monitor implementation of these standards and consider their impact on school meal program participation before issuing any new guidelines or rules that would impose further restrictions on school meals.**

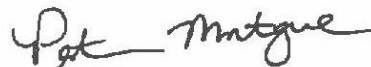
Planning an appealing menu that balances strict calorie, fat and sodium limits and meets daily and weekly school meal component requirements is already challenging. Further sodium and new sugar reductions will require investments in staffing, training and equipment to expand scratch cooking, as well as access to affordable, healthier pre-prepared foods that meet school nutrition standards. SNA is urging USDA and Congress to ensure schools, grappling with rising costs, labor shortages and procurement issues, have the support and [funding needed](#) to successfully implement these new rules.

Again, we thank you for the opportunity to provide input to the DGAC. School nutrition professionals are proud to work alongside the Committee in promoting healthier lifestyles for America's children and ensuring the successful implementation of the DGAs in schools.

Sincerely,



Shannon Gleave, RDN, SNS
President



Patricia Montague, FASAE, CAE
Chief Executive Officer