

CALIFORNIA SCHOOL NUTRITION ASSOCIATION
POSITION STATEMENT
Institutes of Medicine
Recommendations for School Meals

The California School Nutrition Association (CSNA) supports regulations to improve the well-being of the children of California and the nation. Child Nutrition Programs work as partners in the education community to provide healthy meals to all children in order to improve student health and academic achievement. CSNA's intent is to work to secure the best possible environment for learning, physical health and safety within the school setting.

California has over 5.6 million children in public and private schools in kindergarten through grade 12. California school meal programs served more than 4.2 million breakfasts and lunches daily during 2007-08. Schools are the ideal setting to provide opportunities for practicing healthy eating habits based on the foods offered for breakfast and lunches.

Position Statement

The Institutes of Medicine released their Recommendations for School Meals on October 21, 2009. The Food and Nutrition Service of U.S. Department of Agriculture (USDA) requested that IOM use science based evidence in making their recommendations so that school meals comply with the 2005 Dietary Guidelines for Americans. CSNA supports regulations that will provide a comprehensive approach to helping students develop healthy eating habits that include nutrition education in the classroom and cafeteria as well as staff development and coordination of foods sold/served to students while at school. Before implementation USDA must provide realistic funding for the recommendations. CSNA recommends that USDA pilot IOM's recommendations to determine the actual costs and impact on student participation as solutions to the operational issues listed below.

Elimination of Nutrient-Based Menu Plan and California's Shaping Health as Partners in Education (SHAPE)

The IOM report recommends that the Food and Nutrition Service of USDA should not adopt a nutrient-based standard for school meal planning and monitoring but instead use a food-based menu planning system. IOM's rationale is that a food-based meal plan is a better model for students to understand and implement the 2005 dietary guidelines and the current Food Guide Pyramid in making healthy food choices.

CSNA is concerned with the impact of this recommendation on the schools in California that have adopted a nutrient-based standard for meal planning and monitoring. These schools have made substantial investments in computers, software and staff training. Students enjoy menus that maximize flexibility to meet their food preferences. Menu planners receive immediate feedback if the menu meets established nutrient standards. Child nutrition personnel state that nutrient analysis reports provide the public with information that proves that school meals meet nutritional standards. With the increased numbers of students who

are diagnosed with Type II diabetes, nutrient-analysis reports provide information on carbohydrates and calories in school meals used by school personnel, parents and students.

IOM's recommendation for a food-based meal planning system would eliminate California's meal pattern, Shaping Health as Partners in Education (SHAPE). SHAPE is an approved menu planning approach that follows USDA regulations for NSMP with exception in terms of range of calories, preschool targets for calories from fat and saturated fat, establishes targets for sodium, cholesterol and fiber, and the method used to conduct nutrient analysis. Schools participating in SHAPE must provide nutrition education in the classroom and cafeteria, provide staff development for classroom teachers and food service personnel, and develop school policies and procedures that address nutrition related policies, i.e., foods sold/served to students, food for classroom parties, etc. The SHAPE program has documented studies that show continued improvement in students' eating habits as a result of SHAPE's comprehensive approach.

CSNA recommends:

1. Allowing schools the option to use the meal planning system that best suits their district's need and would include: Nutrient Standard Menu Planning, SHAPE and a food based menu plan.
2. Modifying NSMP and SHAPE requirements to increase the number of servings of fruit, vegetables, legumes and whole grain-rich bread/grains as specified by IOM.

Computer Analysis for Calories, Saturated Fat and Sodium

IOM recommends that schools menus track the total calories provided, percentage of the calories from saturated fat and the amount of sodium. USDA estimates that over 60 percent of schools are using the traditional food based menu plan and enhanced food based menu plan where computer analysis of nutrients is not required. Many schools rely on state personnel to conduct the nutrient analysis for one-week of menus reviewed during the Coordinated Review Effort. CSNA recognizes that not all schools have trained and/or adequate personnel able to keep track of calories, saturated fat and sodium in school menus. Due to budget shortages, it may not be possible to purchase computers and software to keep track of the required information. Tracking the required nutrient information manually could result in inaccurate information.

CSNA recommends:

1. Requiring state personnel will conduct nutrient analysis for range of calories, percentage of calories from saturated fat and amount of sodium in a school lunch as part of the Coordinated Review Effort.
2. Encouraging schools to voluntarily monitor nutritional requirements so that they receive immediate feedback if their menus are meeting nutritional standards.
3. Providing adequate funding for state agencies to provide training to schools on required nutrient analysis.

Increased Servings of Fruits and Vegetables

IOM recommended increased servings of fruits and vegetables as these foods provide nutrients that students fail to consume. CSNA members are concerned that the increased number of servings will exceed refrigerated and dry storage space available and space on the serving lines. The cost of labor to cut-up and package fruits and vegetables that students will find acceptable will not be covered by the increased rates of reimbursement that IOM has recommended to USDA. Labor costs in California greatly exceed labor costs in other states. CSNA members indicated that fruit and vegetable consumption would increase if the meal pattern offered more flexibility as to when the fruit and vegetable would be offered. For example, Hemet Unified School District, offers fresh fruit and/or vegetable in the classroom as a way to increase their consumption. USDA should increase spending for the purchase of fresh, frozen or dried fruits and expand to offer fresh vegetables instead of only canned or frozen. Incentives should be provided to the fruit and vegetable industry to develop technology to lower the cost to schools for cut-up fruits and vegetables. Expansion of the farm to school purchase of fruits and vegetables will allow schools to serve produce at the peak of ripeness.

CSNA recommends:

1. Increasing funding for purchase of food service equipment to provide adequate storage space for increased servings of fruits and vegetables.
2. Increasing flexibility as to when fruits and vegetables can be served beyond school breakfast and lunch so that students can increase their intake.
3. Increasing reimbursement adequate to cover the increased costs of pre-cut produce.
4. Increasing purchases of fresh, frozen or dried fruit and expand the commodity program to provide fresh vegetables in the commodity program.
5. Providing incentives to the produce industry to develop technology that lower the cost of pre-cut produce.
6. Enhancing farm-to-school programs so that students are served produce at the peak of ripeness.
7. Providing a comprehensive program for nutrition education in the classroom and cafeteria throughout grades K-12 on the importance of eating fruits and vegetables.

Whole Grain Rich Bread/Grains

IOM recommends that at least one-half of the bread/grain offerings must meet the criterion for a whole grain-rich food. Whole grain-rich products are not well accepted by students currently. Nutrition education in the classroom is lacking on the benefits of eating whole grain-rich products. With over 50 percent of meals consumed outside the home, restaurants do not reflect the use of whole grain-rich bread/grain offerings. The taste and texture of whole grain-rich products can be dry and crumble easily. Whole grain-rich breading is not

acceptable in terms of taste and performance. Whole grain-rich products are limited and their price is higher than enriched products. Inconsistent labeling makes determination of these products difficult to identify.

CSNA recommends:

1. Establishing a range of 30-50 percent for whole grain-rich products so that schools have menu planning flexibility to meet the preferences of their students.
2. USDA provides adequate funding to schools for the purchase of whole grain-rich products.
3. Establishing a timeline to phase in the use of whole grain-rich products in school menus as manufacturers adjust production to meet expanded demand.

Offer vs Serve Requirements

IOM recommends that requiring a fruit and/or vegetable be used to identify a reimbursable meal as well as a recommendation that either one or two items be refused based on the student's preference. CSNA members believe that using a fruit or vegetable as the item that must be on a student's tray will increase food waste significantly and increase costs. Several districts in California reviewed how much fruit students take and found that 30-60% will take fruit while 40-70% of students will not take fruit. Without adequate nutrition education in the classroom, students do not make healthy eating choices without understanding why consuming fruits and vegetables will improve their overall health. Current regulations do not allow a meal served to a student with fewer than the required menu items to be reimbursable. Nor can cafeteria staff force a student to take an item that he/she does not want. Meals served to students that are not complete increase the cost of the program to school districts.

CSNA recommends:

1. USDA not implement IOM's recommendation to require that a student take a fruit and/or vegetable for a meal to be reimbursable.
2. If USDA implements IOM's recommendations, schools are allowed to make the student take the fruit or vegetable so meal will be reimbursable.

Breakfast Meal Pattern

IOM recommends that 1-2 oz. meat/meat alternative plus 1.4-2 oz. grains be implemented for breakfast. CSNA members indicate their concern that requiring 1-2 oz. meat/meat alternate decreases flexibility in offering breakfast menus to students that address morning staffing, whether the kitchen has adequate equipment and storage, and the amount of funding provided for a school breakfast. Additionally IOM recommends that an additional one-half cup fruit for a total of 1 cup be offered for all age/grade groups. CSNA members voiced concern about the additional space, handling and cost required to meet the requirement for additional fruit. Also members voiced concerns about the volume of food being offered to grades K-3. Lastly, CSNA members believe that the funding for breakfast to implement IOM's recommendations is completely inadequate.

CSNA recommends:

1. USDA should maintain maximum menu flexibility in terms of bread/grain and/or meat/meat alternate.
2. Adequate funding must be provided by USDA if IOM's recommendations for breakfast are implemented.

Lack of Adequate Nutrition Education to Support Implementation of IOM's Recommendations

Under-nutrition, overweight and obesity are significant problems for children. Current research confirms that students fail to make appropriate choices when selecting food in the cafeteria. NHANES surveys of students' food choices show that they fail to take adequate servings of fruit, vegetables and whole grains when offered by the cafeteria. A lack of comprehensive nutrition education across the curriculum limits the students' ability to understand and apply healthy eating habits in the cafeteria.

The U.S. Department of Education Office of Educational Research and Improvement published a statistical analysis report on nutrition education across the nation. Approximately 1,400 teachers from 705 schools were surveyed. About half had formal nutrition training. Eighty percent indicated that they taught nutrition to their students an average of 13 hours per school year. However, 50 hours per year was found to be the minimum to show impact on nutritional behavior. Nutrition education in the classroom could best be met by integration of nutrition across the curriculum.

CSNA recommends:

1. U.S. Department of Education specify nutrition education curriculum and mandate that no less than 50 hours of nutrition education per year be required for all students grades K-12.
2. USDA continues to fully fund the National Food Service Management Institute to develop nutrition education materials for food service employees and methods to implement the US Dietary Guidelines in a school cafeteria environment.
3. USDA provides ear-mark funding for nutrition education for students as part of the school meal program.

Marketing School Meals to Students

Food corporations spend billions of dollars towards advertising non-nutritious foods to children. Student peer pressure prevents students from selecting nutritious foods in preference of popular, heavily advertised foods. While student nutrition programs do their best to advertise internally the benefits of school meals, USDA has provided little in terms of funding or a marketing campaign to promote the benefits of school meals.

CSNA recommends:

1. USDA fund and create an effective marketing program using all media methods to advertise the benefits of school meals to school administrators, parents, students and the general public.

Adequate Time for Lunch

Primary schools frequently combine lunch period and playground time. Consequently, younger students do not have time to restfully enjoy their lunch and rush to eat their food so there is time to play. Most California high schools schedule a single lunch period where cafeterias must do their best to feed 2,200-3,000 students within an average 27-40 minutes. The food quality and freshness declines when a single lunch period is offered because cafeteria staff must cook the food earlier and in larger batches so serving schedules/deadlines are met.

CSNA recommends:

1. Providing incentives for districts to provide multiple lunch periods for schools with enrollments in excess of 2,000 students.
2. Recognizing the need for mandated minutes for lunch periods that will allow students adequate time for lunch to be served and eaten in a restful and uncrowded dining room.
3. Providing an incentive to schools to schedule playground time before lunch is served.

Adequate Staffing for Student Nutrition Programs

Prior to the 1980s most student nutrition employees worked 5-8 hours per day. The majority of foods served in the cafeteria were made from scratch using fresh ingredients. In the 1990s rising personnel costs caused districts to reduce work hours for cafeteria staff from 8 hours to 2-3 hours per day. Staffing reductions has led to the purchase of more prepared foods and less recipes prepared from scratch. Districts faced with budget short falls have lowered their costs by eliminating dining room supervision. Cafeteria personnel who should be focused on improving the quality of school meals must provide dining room supervision instead. The Dietary Guidelines recommend that students eat more fresh fruits, vegetables and whole grain-rich foods. Sites that have implemented a self-serve garden bar recommend that additional trained cafeteria personnel are required to prepare fresh produce, set-up the garden bar, assist students with their selections, replenish the ingredients, maintain food safety standards and encourage and motivate students. Involving students in recipe evaluation, product selection and menu planning is a component for ensuring high rates of participation in the student nutrition programs. Inadequate staffing may cause districts to reduce student feedback in program administration. Reductions in cafeteria staffing prevent coordination between nutrition education taught in the classroom and activities in the cafeteria that will reinforce nutrition principles.

CSNA recommends:

1. Providing additional funding so that adequate personnel can be hired to prepare more foods from scratch, implement garden bars, coordinate and involve students in menu planning and evaluation of recipes and products, and develop activities in the cafeteria that reinforce nutrition education in the classroom.
2. Requiring that districts must provide adequate cafeteria supervision so that student nutrition personnel can focus on activities related to meal preparation and service.