



# HARVARD SCHOOL OF PUBLIC HEALTH

Department of Nutrition

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Julie Brewer

Chief, Policy and Program Development Branch, Child Nutrition Division  
Food and Nutrition Service, Department of Agriculture  
3101 Park Center Drive, Room 640  
Alexandria, Virginia 22302-1594

Docket ID: FNS-2007-0038-0001

Dear Ms. Brewer:

We are writing to comment on the U.S. Department of Agriculture (USDA) Food and Nutrition Service's proposed rule on nutrition standards for school meal programs.

Overall, we are pleased that the USDA has followed the evidence-based guidance of the Institute of Medicine's report, *School Meals: Building Blocks for Healthy Children*, in developing these proposed standards. We strongly support many of the proposed changes, since these will help increase children's access to fruits, vegetables, and whole grains during the school day, and lower their consumption of sodium. Yet we feel that the standards still do not go far enough to improve children's diets in ways that will help prevent obesity and lower the risk of chronic diseases.

We have outlined below some of the key proposed nutrition improvements that we support, as well as additional changes that will further address the obesity and chronic disease epidemics in this country:

### **Proposed Nutrition Changes We Support:**

- Increasing the number of servings of fruits and vegetables served with meals, including a separate vegetable requirement for lunch.
- Promoting greater variety of vegetables, and limiting the number of starchy vegetables, such as French fries.
- Ensuring all grains served in the school lunch and breakfast programs are rich in whole grains.
- Lowering sodium in meals over time.
- Minimizing trans fat.
- Establishing a range with minimum and maximum limits on the amount of calories that can be served for meals within specific age/grade groups.
- Ensuring schools are regularly reviewed to assess compliance with the new nutrition standards.

- Providing training and technical assistance and supporting nutrition education and promotion efforts, as soon as possible, to help schools implement the meal changes by the start of the 2012 school year.

### **Additional Nutrition Improvements We Recommend:**

- Limit added sugars. School-aged children currently consume 21 to 34 teaspoons of added sugar per day, and the American Heart Association has recommended that American's dramatically cut back on added sugar intake to lower the risks of obesity and heart disease.<sup>1</sup> To limit added sugars, we recommend the following:
  - Eliminate sweetened, flavored milk from school meals.
  - Limit the number of grain and dairy-based desserts to no more than two servings per week, and limit the portion sizes of grain and dairy-based deserts (1 oz for cookies, 2 oz for other bakery items, 4 fluid ounces for dairy-based desserts).
  - Limit added sugar in cereals to no more than 8 grams per serving, and require cereals to have at least 4 grams of fiber (all cereal fiber, not processed "functional" fibers).
- Develop stricter definitions of whole grain rich foods. The current IOM-recommended definition of "whole grain rich" foods as foods that contain at least 8 grams of whole grains per serving is not adequate, especially for foods that are high in carbohydrate, because the 8 gram threshold still allows for large amounts of refined grains and added sugars. Define whole grain rich foods as foods that contain at least 51 percent whole grain, or foods that list a whole grain first on the ingredients list.
- Limit refined grain foods (white rice, white bread, white pasta, e.g.) to no more than one entrée, one dessert, and one side dish per week.
- Limit red meat to no more than 2 servings per week, and eliminate processed meat (hot dogs, deli meats); substitute fish, poultry, beans, and soy products instead. Research has found that red meat and processed meat increase the risk of heart disease, diabetes, and some cancers, and that substituting more healthful proteins can lower these disease risks.<sup>2</sup>
- Fruit juice should not be allowed to contribute to half of the daily fruit requirement and should be served no more than 4 oz per day across all school meals. Fruit juice, even 100 percent fruit juice, has as much sugar as a soft drink, and evidence suggests that fruit juice does not offer the same health protective benefits as whole fruit.<sup>3</sup> Water can be a substitute.
- Further minimize trans fat intake by eliminating foods that contain any partially hydrogenated oil in their ingredients.
- Remove any cap on total fat, and retain only the cap on saturated fat (10 percent of calories) and the restrictions on trans fat, since extensive research has shown that the type of fat in the diet—not the percentage of calories from fat—is what's important for preventing chronic disease. Specifically, for preschooler breakfast and lunches (pp. 2558, 2567), and infant breakfasts (p. 2567), eliminate the cap on total fat of 30 percent. For K-

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<sup>1</sup> Johnson RK, Appel LJ, Brands M, et al. Dietary sugars intake and cardiovascular health: a scientific statement from the American Heart Association. *Circulation*. 2009;120:1011-20.

<sup>2</sup> Bernstein AM, Sun Q, Hu FB, Stampfer MJ, Manson JE, Willett WC. Major dietary protein sources and risk of coronary heart disease in women. *Circulation*. 2010;122:876-83.

<sup>3</sup> Bazzano LA, Li TY, Joshipura KJ, Hu FB. Intake of fruit, vegetables, and fruit juices and risk of diabetes in women. *Diabetes Care*. 2008;31:1311-7.



12 meals, the standards do not spell out any cap on total fat, and appropriately, use a food-based approach that includes limits only on calories, sodium, saturated fat, and trans fat.

- Allow students to choose to take their breakfast fruit with them to eat later in the day as a snack (similar to USDA's summer food program "walking apple" rule).
- Allow tofu to qualify as the meat/meat alternate requirement in school meals.
- Improve the quality and selection of fruit and vegetables offered and promote their consumption through creative marketing.

**Proposed Programmatic, Oversight, and Implementation Changes We Support:**

- Implementing a three-year review cycle and including the School Breakfast Program in the reviews.
- Allowing states to take fiscal action against a school for failing to meet the new nutrition standards after providing technical assistance and corrective action.
- Providing flexibility for schools offering "grab and go" breakfasts from kiosks as long as they meet the nutritional standards. We would like to see this flexibility extended to all breakfast in the classroom programs.
- Encouraging schools to inform students, parents, and the public about efforts they are making to meet the school meal requirements and to improve children's nutrition.

**Additional Programmatic, Oversight, and Implementation Changes We Recommend:**

- Make sure that school lunch is served at a reasonable time, and children have at least 30 minutes to eat.
- Ensure a fair, thorough, and consistent system of certification to enforce the new standards as required by the Healthy, Hunger-Free Kids Act.
- Provide the extensive support and equipment needed to enable school food service operators to adapt to the many changes required by new meal rules.
- Make State and USDA reviews, inspections, and monitoring reports available on-line to the public, as provided in recent Presidential directives.
- Fund USDA studies to evaluate the impact of the new meal requirements.

Some parties have raised concerns that the proposed recommendations, particularly those around increasing vegetables and limiting potatoes, will be difficult to implement, since potatoes and French fries are popular menu items. This is flawed thinking that ultimately undermines our children's, and our nation's health and future: Schools need to develop delicious healthful recipes and market them to children, rather than continuing to limit children's palates and diets.

Given the high obesity rates among children and the important role school meals play in children's diets, implementing these updated standards will make an important contribution to improved dietary intake and the long-term health of millions of children across the country. Implementation of this new rule also should ensure consistency with efforts by schools and other nutrition, health, and education stakeholders to reach the largest possible number of students with the benefits of healthy school nutrition.

We applaud the USDA for these important efforts and urge full implementation within the USDA's proposed time line to ensure children have greater access to nutritious meals and school food service staff benefit from the training and technical assistance needed to implement the changes.

Sincerely,

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