April 30, 2020

Ms. Kristin Koegel  
USDA Food, Nutrition and Consumer Services  
Center for Nutrition Policy and Promotion  
Braddock Metro Center II  
1320 Braddock Place, Room 4094  
Alexandria, VA  22314

Dear Ms. Koegel:

These comments are submitted on behalf of the 55,000 members of the School Nutrition Association (SNA) in response to the Federal Register Notice, Meetings: 2020 Dietary Guidelines Advisory Committee, Docket Number: FNS-2019-0001.

SNA’s membership includes school nutrition professionals serving pre-K-12 students, college level academic instructors/professors in related fields, state agency personnel administering federal child nutrition programs and other related professionals. SNA’s members directly serve pre-K-12 students; therefore, comments are related to children and adolescents, ages 2-18 years old.

SNA appreciates that the Dietary Guidelines Advisory Committee (DGAC) provided the Association an opportunity to offer testimony in the process of developing the DGA’s. As part of that testimony, the Association shared that school nutrition professionals provide the foundation for meals at schools, serving 30 million students each school day, with the potential to reach 50 million students nationwide. Our members work on the frontlines every day to transform the DGA’s recommendations into meals students will eat and enjoy, while simultaneously boosting academic preparedness and teaching them lifelong healthful eating habits that will positively impact their future dietary practices.

The Association strongly supports sound, evidence-based guidelines. These guidelines, however, must be practical and framed such that students will choose to eat nutritious meals at school that in turn will influence their choices throughout their lives. School nutrition professionals are tasked with the job of enticing students to make healthful food choices at school when those choices are seldom reinforced in other settings. Our members wholeheartedly accept this responsibility to help shape students’ current and future food choices. And, we have made tremendous progress in this area by innovations and resourcefulness such as creative menu strategies, student taste tests, farm to school programs and
nutrition education initiatives that have spurred progress by offering nutritious meals at schools that contain more fruits, vegetables, whole grains, low fat milk and lean proteins.

While these strategies have aligned with the DGA’s recommendations to guide our students toward healthier food choices, there have been many challenges and unintended consequences given the prescriptive way the DGAs have been applied to the programs. The guidelines are intended to serve as a recommendation to guide Americans toward healthier food choices, but in school nutrition programs, the rapid implementation of the school meal standards contributed to a decline in the average daily participation in school lunch by over 2 million per day. With research showing that meals at school are more nutritious than ever and more nutritious than other alternatives, the large decrease in the number of students eating healthy school meals is a missed opportunity that undermines the goals of the DGA’s.

The DGAC should be aware of the operational and budgetary constraints of school nutrition programs which are expected to be financially independent within their school districts, earning their way via meal sales. School meal programs receive a maximum rate of $3.65 to prepare a school lunch that includes low fat milk, fruits, vegetables, whole grains and lean proteins as well as cover the cost of staff salaries and benefits, supplies and equipment. To remain financially solvent and sustainable, school meal programs must appeal to diverse student tastes, and accommodate special dietary needs such as food allergies and tube feedings. This is accomplished in an environment of increasing competition from home packed meals to food trucks parked outside school doors and fast food outlets located a few blocks away. Therefore, the Association strongly encourages the DGAC to promulgate DGA’s that are both evidenced based and practical for school districts to implement. This approach will allow school nutrition professionals to provide nutritious meals and would be more cost effective.

SNA appreciates the opportunity to provide these comments to the DGAC and would note that initial comments were submitted in March 2018 at the inception of the committee’s work.

Sincerely,

Gay Anderson, SNS
President

Patricia Montague, CAE
Chief Executive Officer