



Institute of Medicine: Nutrition Standards and Meal Requirements for National School Lunch and Breakfast Programs: Phase 1. Proposed Approach for Recommending Revisions

Comments of Action for Healthy Kids

January 28, 2009

Good afternoon. My name is Rob Bisceglie, and I am executive director of Action for Healthy Kids. Action for Healthy Kids is a national, grassroots non-profit organization focused on addressing the epidemic of overweight, undernourished and sedentary youth by improving nutrition and physical activity in schools. Our public-private partnership involves more than 60 national partner organizations and government agencies representing education, health, nutrition and fitness. Through a network of grassroots, state-based Teams across the country we have mobilized more than 11,000 volunteers to help schools positively change the school environment so our kids are fit, healthy and ready to learn. Our volunteer experts include registered dietitians, teachers, administrators, physicians, and state health or education employees as well as lay people such as mothers, fathers, students themselves and other concerned citizens.

Because of our charge, we are keenly interested in the work of this Committee. We are fully supportive of the National School Lunch and School Breakfast Programs, and we commend your efforts to respond to USDA's charge to identify ways to help make the school meals provided through NSLP and SBP more consistent with current understandings about the diet and health of U.S. children.

The principles you have laid out for determining recommendations for revisions to the Nutrition Standards and Meal Requirements for School Meals are consistent with principles of Action for Healthy Kids. We recognize the potential of the school cafeteria as a learning environment for children and the opportunity this holds for forming food preferences and dietary patterns that have lifelong impact. We also recognize the social and emotional value of food and group meals. But as stated in your report, for many of our country's children, school meals play an even more critical role – that of safety net for meeting essential energy and nutrient needs, especially relevant in today's times of economic insecurity. In this regard, we are concerned both with the implications of chronic under-consumption of necessary nutrients, as well as overconsumption of energy relative to activity among some of our youth. It is appropriate that today we are taking a hard and disciplined look at the best way of achieving a nutrient/energy balance in the meals we serve our children, while at the same time keeping in mind the financial implications of our ultimate recommendations on schools, students, and families.

We applaud the level of detail with which you have addressed the task of assessing nutrient and food need and intake. At this time, we have little to offer with respect to the logic behind your analyses. The application of MyPyramid appears to compare favorably with the use of Target Median Intakes. The approach for validating the appropriateness of MyPyramid likewise seems suitable. As noted in Phase I, using MyPyramid as a standard is likely to make meal planning simpler for food service personnel and to make monitoring easier. We do wish to make one specific recommendation relative to how nutrient intake from school meals is assessed. **We**

believe that the average value of meals over a week’s time period, rather than judgments based on the nutrient content of individual foods or individual meals, is most appropriate. It is almost inconceivable that every breakfast and every meal will be “perfect” in terms of nutrient content; in fact, such a goal is impracticable and unnecessary. Rather, the Dietary Guidelines generally are applied over the course of a week when evaluating school meals. We suggest that this practice be maintained.

Our second main comment is related to the overall cost analysis.

There likely is little disagreement that meeting program goals while maintaining program costs at current levels is a daunting challenge. The general consensus among the health community that even greater emphasis in the future should be placed on foods and meals of high nutrient density in order to achieve stated nutrient and energy goals escalates this challenge further. Often, foods of high nutrient density are more expensive than other options, and clearly, food and related costs are outpacing available resources.

We understand the Committee’s assumption – and possibly charge – that at best, money allocated to the program will be maintained near current levels. We hope that this assumption will not keep the Committee from providing its straightforward view, after evaluating this wealth of information, about whether we realistically can meet the bar set for school meal standards given current resource allocations. **If there is not enough money to fund these programs adequately, we urge you to say so.**

We further urge this Committee extend its Phase II work to attempt to demonstrate what might be achieved should modest levels of additional funding for the School Lunch and School Breakfast Programs be obtained. I will elaborate:

As we have demonstrated in Ohio, even modest increases in program support and promotion can lead to significant improvements in program quality. In that state, Ohio Action for Healthy Kids has distributed \$25,000 annually in school breakfast mini-grants, ranging in size from \$500-\$1,000. The mini-grants provided schools with funds for school breakfast programs start-up, expansion, and marketing/promotion. In part due to the mini-grant funds and the associated technical assistance, school breakfast participation in Ohio increased 15% in only 13 months. The nutrition and health community is confident of a positive relationship between breakfast eating and readiness to learn. Given that, these findings are particularly noteworthy.

Today, many schools—especially those in underserved communities—are struggling to make ends meet while improving the academic achievement and health of their students. To continue doing so, they need the help of experts—like those participating in this process—to provide practical solutions to common problems that oftentimes seem to defy resolution. Additional insight about the potential impact of additional resources on program parameters such as variety of food choices, meal acceptance, and overall program participation could be helpful at the federal, state and district levels. This type of objective cost/benefit analysis could provide great value as decision makers prioritize available resources and could lead to incremental funding that might provide great value in enhancing meal quality.

Furthermore, this type of analysis potentially could provide further compelling evidence that the status quo is simply not good enough, and that more is needed when it comes to our investment in our children and our

future. To the extent that your work can address tomorrow's opportunities—rather than just today's financial limitations—we implore you to lead in the pursuit of a more just community in which every child in every state in every school in the country has the support she or he needs to develop lifelong habits necessary to promote health and learning.

Thank you for the opportunity to share the thoughts of Action for Healthy Kids and our network of more than 11,000 volunteers with you this morning. We appreciate your work and dedication on this issue and offer our support in your vital efforts.