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Food and Nutrition Service, Department of Agriculture
3101 Park Center Drive, Room 640
Alexandria, Virginia 22302-1594
Docket ID: FNS-2007-0038

Re: Nutrition Standards in the National School Lunch and School Breakfast Programs

Dear Ms. Brewer:

United Fresh Produce Association is pleased to submit comments on behalf of our members regarding the United States Department of Agriculture (USDA), Food and Nutrition Service's proposed rule on Nutrition Standards in the National School Lunch and School Breakfast Programs.

United Fresh supports USDA's efforts to propose a rule which will align school meals with the 2005 and 2010 Dietary Guidelines, increase the availability of fruits and vegetables in school meals, and result in more nutritious, healthier schools meals that will improve the eating habits of school children and promote good health. As the proposed rule notes, the greatest change in school breakfast is the increase in fruit, which doubles the current requirement to 1 cup per day. For school lunch, the greatest change is the increase in fruits and vegetables, an increase of almost four servings a week. Our comments here will outline specific areas where we support the proposed rule, and specific areas where we recommend an alternative approach.

United Fresh represents more than 1,200 companies at the forefront of the global fresh and fresh-cut produce industry, including growers, shippers, fresh-cut processors, wholesalers, distributors, retailers, foodservice operators, industry suppliers and allied associations. United Fresh works to drive policies that increase consumption of fresh produce, provide scientific and technical leadership in food safety, quality assurance, nutrition and health, and develop educational programs and business opportunities to assist member companies in growing successful businesses.

General Comments

It has been 15 years since the nutrition standards for school meals were last updated and during that time many advances in nutrition science and dietary guidance have been made. The current nutrition standards and meal requirements for the National School Lunch Program (NSLP) and School Breakfast Program (SBP) are inconsistent with both the 2005 Dietary Guidelines and the 2010 Dietary Guidelines. One of the biggest inconsistencies, or gaps, is in the amount of fruits and vegetables available and served in school meals. In 2004, Congress amended the National School Lunch Act, (Section 9 (a) (4), to require that school meals be consistent with the most recent Dietary Guidelines.

Therefore, it is a statutory requirement that schools serve meals that are consistent with the goals of the Dietary Guidelines. Many of the proposed changes will help to

finally align school meals with the Dietary Guidelines. Healthy school meals are also a public health imperative. Since the NSLP serves 32 million children a day and the SBP serves 12 million children a day, both programs play a key role in supporting the nutrition and health of school children and should be models of good nutrition.

In general, United Fresh applauds USDA for considering the Institute of Medicine's (IOM) "School Meals: Building Blocks for Healthy Children" (October 2009) recommendations. The IOM was specifically charged with making recommendations to align school meals with the Dietary Guidelines for Americans and to improve the healthfulness of school meals. The IOM recommended that USDA adopt standards for menu planning that would:

- Increase the amount and variety of fruits, vegetables and whole grains;
- Set minimum and maximum levels of calories and;
- Reduce the amount of sodium and saturated fat.

On January 31, 2011 the USDA and the U.S. Department of Health and Human Services published the *2010 Dietary Guidelines for Americans*, the federal government's evidence-based nutritional guidance to promote health, reduce risk of chronic diseases, and reduce the prevalence of overweight and obesity through improved nutrition and physical activity. "Make half your plate fruits and vegetables" is one of the key consumer messages of the 2010 Dietary Guidelines. Recognizing that on average most Americans, including children, eat less than half of the daily amount of fruits and vegetables recommended for good health, the 2010 Dietary Guidelines provide a clear, compelling recommendation to "make half your plate fruits and vegetables." This recommendation applies to all meals, including school breakfast and school lunch. Once implemented, the proposed rule will double the amount of fruits and vegetables served in school meals, and will result in school meals modeling the "half a plate" recommendation.

The 2010 Dietary Guidelines highlight three primary reasons why Americans need to eat more fruits and vegetables. First, most vegetables and fruits are major contributors of a number of nutrients that are under consumed in the U.S. including folate, magnesium, potassium, dietary fiber, vitamins A, C and K. Potassium and dietary fiber intake is so low that it is considered a public health concern for the general public. Second, consumption of vegetables and fruits is associated with reduced risk of many chronic diseases. A diet rich in fruits and vegetables is associated with reduced risk of cardiovascular disease, stroke, and high blood pressure. Third, most fruits and vegetables, when prepared without added sugar and fat, are relatively low in calories. Eating more fruits and vegetables instead of higher calorie foods will help children and adults achieve and maintain a healthy body weight.

Children are a particularly important focus of the 2010 Dietary Guidelines because of the growing body of evidence documenting the vital role that optimal nutrition plays throughout the lifespan. Today, too many children are consuming diets with too many calories and not enough nutrients. Combined with too little physical activity, the result is an epidemic in childhood overweight and obesity - 32% of children and adolescents ages 2 to 19 years are overweight or obese, with 17% of children obese. Additionally, risk factors for adult chronic diseases are increasingly found in younger ages. Eating habits are established in childhood and are carried into adulthood. Because childhood overweight and obesity are serious public health problems in the U.S., schools should play a leadership role in helping students adopt healthy eating

habits. With some 50% of children's total daily calories consumed at school, it is critically important that school meals are a model of good nutrition and help children adopt healthy eating habits that they will carry into adulthood.

Many schools including the 1,122 schools in 40 states that have received Healthier US School Challenge (HUSSC) awards have made great progress in the last five years in serving healthier school meals and increasing physical activity. Hundreds of additional schools are working to achieve HUSSC recognition. These HUSSC designated schools are already serving more fruits and vegetables every day and serving variety of colorful vegetables every week. And, their students are trying new fruits and vegetables and eating more. HUSSC schools have demonstrated an ability to operate cost-effective school meals programs that emphasize many of the same foods required by the proposed rule. HUSSC schools should serve as models for other schools as implementation moves forward.

The Fresh Fruit and Vegetable Program, now reaching over 3 million low-income elementary school students in 3,000 schools nationwide, has clearly demonstrated that children like fresh fruits and vegetables and will increase their consumption when a wide variety of great tasting fresh fruits and vegetable are provided to them as snacks either mid-morning or mid-afternoon. The most frequently served fresh fruits and vegetables are: asparagus, avocado, baby carrots, broccoli, cauliflower, celery, cherry tomatoes, cucumbers, jicama, mushrooms, red/green peppers, sugar snap peas, apples/fresh-cut sliced apples, Asian pears, bananas, blueberries, cantaloupe, grapefruit, grapes, honeydew melon, kiwi, mango, oranges, papaya, pears, pineapple, plums, raspberries, strawberries, tangelos, tangerines and watermelon. Many of these popular fresh fruits and vegetables are now being included in school lunch menus, with the same positive impact on children's fruit and vegetable consumption. The Fresh Fruit and Vegetable Program has transformed 3,000 elementary schools nation-wide, provided opportunities for children to try a wide variety of fresh fruits and vegetables, increased their overall consumption, and improved their eating habits.

Let's Move Salad Bars to Schools is another example of an effective strategy to increase student's consumption of a wide variety of fruits and vegetables every day at lunch. *Let's Move Salad Bars to Schools*, launched to support First Lady Michelle Obama's *Let's Move* initiative, is designed to significantly increase the number of salad bars in schools in order to increase student's access and choices of a wide variety of fresh fruits and vegetables and increase their consumption. A fruit and vegetable bar, garden bar or salad bar is one of the easiest ways for schools to accomplish the new fruit and vegetable requirements for lunch and to ensure that children kids actually eat more.

Comments in Support of Specific Provisions of the Proposed Rule

1. United Fresh supports the requirement to double the amount of fruit served at school breakfast to 1 cup per day. We support the emphasis on serving whole fruit to increase fiber.

This change will align school breakfast with the Dietary Guidelines and help children increase their overall fruit and vegetable intake as recommended by national health authorities. Eating a nutrient-dense breakfast is an important principle for promoting calorie balance and weight management.

We encourage school food officials to serve a variety of fresh and fresh-cut fruit that children like and will eat. The California Fresh Start Program, a pilot program to double the amount of fresh fruits and vegetables offered to school children at breakfast, clearly demonstrated that offering students more fresh fruits and vegetables increased their consumption by over 136%. The most frequent types of fresh fruits offered to students in the Fresh Start Program were: apples, oranges, bananas, stone fruits, grapes, berries (strawberries and blueberries), melons, kiwi, pineapple, tangerines/tangelos, and pears. The goal of changing the nutrition standard for breakfast, including serving more fruit, is to improve children's eating habits. So, it is critically important that schools serve fruits that children will eat. This is doubly important in light of the requirement that children take at least one fruit at breakfast in order for the meal to be counted as a reimbursable meal.

2. United Fresh supports the recommendation that only half of the total amount of fruit served at breakfast can be in the form of 100% juice.

Currently, children ages 2–18 years consume more than half of their fruit intake as juice. Although 100% fruit juice can be a valuable part of a healthy diet, the American Academy of Pediatrics recommends that children limit juice intake to one serving a day. The 2010 Dietary Guidelines notes that the majority of fruit recommended should come from whole fruits.

3. United Fresh supports the proposed requirement to increase the amount of fruit served at lunch to ½-1 cup per day. We support the emphasis on serving whole fruit to increase fiber.

This change will align school lunch with the Dietary Guidelines and help children increase their overall fruit and vegetable intake as recommended by national health authorities. The goal of changing the nutrition standard for lunch, including serving more fruit, is to improve children's eating habits. Therefore, it is critically important that schools serve fruits that children like to eat. This is especially important in light of the requirement that children take at least one fruit or vegetable at lunch in order for the meal to be counted as a reimbursable meal.

4. United Fresh supports the proposed requirement to increase the amount of vegetables served at lunch to ¾-1 cup per day.

This change will align school lunch with the Dietary Guidelines and help children increase their overall fruit and vegetable intake as recommended by national health authorities. The goal of changing the nutrition standard for lunch, including serving more vegetables, is to improve children's eating habits. A fruit and vegetable salad bar is an easy way to serve a wide variety of vegetables at lunch each day and salad bars are an effective strategy to increase children's consumption. Salad bars offer variety and that variety can change each day, week and season. They also encourage students to try new vegetables. Serving vegetables children like to eat is especially important in light of the requirement that children take at least one fruit or vegetable at lunch in order for the meal to be counted as a reimbursable meal.

5. United Fresh supports the proposed requirement to serve both a fruit and a vegetable everyday at lunch.

This change will align school meals with the Dietary Guidelines and help children increase their overall fruit and vegetable intake as recommended by national health authorities. The goal of changing the nutrition standard for lunch, including serving both a fruit and a vegetable daily, is to improve children's eating habits. Therefore, we encourage school food officials to serve a variety of fresh and fresh-cut vegetables that children like and will eat. A fruit and vegetable salad bar is an

excellent way to serve a wide variety of fruits and vegetables at lunch and salad bars are an effective strategy to increase children's consumption. Salad bars offer variety and that variety can change each day, week and season. They also encourage students to try new fruits and vegetables. Serving student's fruits and vegetables they like is doubly important in light of the requirement that children take at least one fruit or vegetable at lunch in order for the meal to be counted as a reimbursable meal.

6. United Fresh supports the proposed requirement to serve dark green and orange vegetables weekly. Additionally, we support including a new red-orange vegetable subgroup in the proposed meal standards.

We support the proposed requirement to serve dark green, red and orange vegetables each week. The proposed rule would require that at least ½ cup of dark green vegetables be served each week, at least ½ cup of red vegetables be served each week and that ½ cup of orange vegetables be served each week. This change will align school meals with Dietary Guidelines recommendations to eat dark green, red and orange vegetables weekly. Many children do not eat a variety of vegetables and current consumption of dark green, red and orange vegetables is very low. Dark green, red and orange vegetables are good sources of vitamins A, C, and K, potassium, folate, magnesium, and dietary fiber. Eating a variety of colorful vegetables ensures nutrient adequacy. The addition of red vegetables to the orange vegetable subgroup would give tomatoes and tomato products more prominence and help balance the vegetable subgroups. Fresh tomatoes and tomato products are also very popular with children and tomatoes are a good source of vitamins A and C and potassium.

Salad bars are an excellent way to serve a wide variety of colorful vegetables at lunch each day and an effective strategy to increase children's consumption. Salad bars offer variety and that variety can change each day, week and season throughout the school year. Salad Bars encourage students to try new vegetables and many dark green vegetables, including romaine lettuce and other leafy greens, broccoli, and spinach, and red-orange vegetables, including cherry tomatoes, red peppers, and carrots, are routinely served in school salad bars. Students readily select dark green, red, and orange vegetables to eat from their school's salad bar.

7. United Fresh supports the proposed food-based meal patterns for breakfast and lunch.

We support food-based meal patterns for breakfast and lunch. Food-based meal standards will help align school meals with the Dietary Guidelines and reinforce school nutrition education programs. A basic premise of the 2010 Dietary Guidelines is that nutrient needs should be met primarily by consuming a variety of nutrient-dense foods from the basic food groups. Fruits and vegetables are naturally nutrient-dense and low in calories.

8. United Fresh supports the proposed standards for menu planning.

We support USDA's proposal for a food-based approach to menu planning with three consistent age-grade groups for breakfast and lunch. The proposed meal pattern for breakfast would include fruit, grains, meat/meat alternatives and milk. The proposed meal pattern for lunch would include fruits, vegetables, grains, meat/meat alternatives and milk. This proposal offers a simplified approach to menu planning while maintaining consistency with the basic premise of the *Dietary Guidelines*: that nutrient needs should be met primarily by consuming nutrient-dense foods. The intent of the proposed changes is to offer school meals that are nutrient-rich and

calorie appropriate—specifically more fruits, vegetables, and whole grains consistent with the Dietary Guidelines.

9. United Fresh supports the proposed minimum and maximum calorie levels for grades K-5, 6-8 and 9-12 for breakfast and lunch.

We agree with USDA's proposal for calorie minimum and maximum levels in the school meal programs. We agree with the new age/grade groupings which better align with current school grade levels. The calorie ranges proposed are consistent with the updated Dietary Reference Intakes (DRI's) and appropriate for the updated age/grade groupings. The ranges support the need to balance between providing good nutrition, addressing concerns about childhood obesity, and addressing food insecurity. They also will support the school meal programs in modeling appropriate portion sizes and calorie levels.

With 32% of children in the U.S. already overweight and obese, it is important that school meals not include excessive calories from added sugars and added fat. We agree that the intent of these changes is not to reduce children's food intake, but to focus on nutrient-dense foods, increased amounts of fruits, vegetables and whole grains, and avoid excessive calories. Currently many schools have to add sugar to foods/recipes in order to meet calorie requirements. This results in cookies or other desserts being served instead of fresh fruit at lunch. The proposed calorie maximums leave little room for discretionary calories from added sugar and fats.

10. United Fresh supports the proposed elimination of fortified grain-fruit products.

We support the proposed change to disallow a fortified grain product from being credited as a fruit serving. A basic premise of the Dietary Guidelines is that nutrients should come primarily from consumption of whole foods that are not highly processed or heavily fortified. Fruits and vegetables are nutrient-dense foods and are often excellent and/or good sources of dietary fiber, potassium, and Vitamins A and C. The nutrient density of fruits and vegetables cannot be duplicated by a formulated grain-fruit product. School meals should promote the consumption of naturally nutrient-dense foods. Fortified grain-fruit products are often high in sugar and fat. Such products do not support the Dietary Guidelines recommendation to consume fruit as a separate and important food group.

11. United Fresh supports disallowing the crediting of snack-type fruit or vegetable product (such as fruit strips or fruit drops, etc.), regardless of their nutrient content, toward meeting the fruit and/or vegetable component of the meal.

We support the proposed change to disallow the crediting of snack-type fruit and vegetable products, such as fruit strips, fruit drops, etc. The Dietary Guidelines emphasizes increasing fruit and vegetable consumption and eating whole fruits and vegetables. We believe that foods served as part of the school meals programs should be easily recognized by children as a fruit or a vegetable and part of a food group that contributes to a healthy diet. A wide variety of fruits and vegetables are readily available in the U.S. and schools should be serving fruits and vegetables, not a candy-type product that is masquerading as a fruit or vegetable.

12. United Fresh supports the proposal to require schools to identify the foods composing a reimbursable meal at or near the beginning of the serving line.

We support the proposal to require schools to identify the foods composing a reimbursable meal at or near the beginning of the serving line. This will support the goals of the nutrition programs and promote nutrition education by helping children identify healthy, balanced meals with appropriate portion sizes and representation from all food groups. It also may help reduce crediting problems for school meals by encouraging children to select a full meal.

13. United Fresh supports the proposal to require all schools to implement the new nutrition standards beginning in school year 2012-2013, with final whole grain requirements implemented in school year 2014-15.

Updating school meals to align with the Dietary Guidelines is long overdue. Current meal standards are not consistent with dietary guidance for increasing fruits, vegetables, whole grains, and reducing sodium and saturated fat. Overall, the proposed meal standards should not be a big surprise to schools. Since January 2005, USDA has strongly encouraged schools to serve more fruits, vegetables and whole grains as recommended by the 2005 Dietary Guidelines. USDA has also provided technical assistance and guidance to help schools offer meals that reflect the recommendations of the Dietary Guidelines since 2005. To motivate schools to make these important changes, USDA launched the Healthier US Schools Challenge (HUSSC) several years ago. The HUSSC focuses on incentivizing schools to serve more fruits, vegetables, whole grains, etc. and recognizes schools who meet the HUSSC criteria. More recently, USDA has provided financial rewards to motivate more schools to accomplish the HUSSC goals. First Lady Michelle Obama has made HUSSC a key priority of her *Let's Move* initiative and frequently visits designated schools to present the awards. Also, in October 2009, the Institute of Medicine published recommendations for aligning school meals with the Dietary Guidelines in its report "School Meals: Building Blocks for Healthy Children." The IOM's recommendations were widely discussed and disseminated to school food officials.

Schools have had ample notice and encouragement to implement the principles of the Dietary Guidelines. Over the next year, training and technical assistance should be targeted to school districts that are in most need of help in implementing the principles of the Dietary Guidelines. Triaging schools can be an effective strategy to prioritize training and technical assistance and help those schools make improvements this coming school year. With a focus on enhanced training and technical assistance throughout the 2011-12 school year, it is feasible to implement the new standards in the 2012 school year.

14. United Fresh supports the proposed changes in monitoring procedures.

We applaud the inclusion of the unified accountability system, as required by the Healthy, Hunger-Free Kids Act, in the proposed regulations. We support the proposed changes to implement a three-year review cycle and add breakfast to the reviews. The emphasis on continuous quality improvement and training and technical assistance is critical to the successful implementation of the proposed meal regulations. We suggest a simplified review process which could focus on key compliance issues, such as providing variety and the correct fruit and vegetable portion sizes, meeting whole grain requirements, and reducing sodium and saturated fat to target levels. State agencies could then use review results to better focus limited resources to School Food Authorities with the highest levels of noncompliance.

We agree with the proposal to take fiscal action for repeated compliance violations not resolved through technical assistance and corrective action. New requirements for fiscal action will increase accountability in the programs and improve compliance and meal quality.

While we understand the certification criteria to receive the additional reimbursement of \$.06 per lunch will be addressed in subsequent rulemaking, we urge USDA to provide guidance and a proposed rule quickly, as specified in USDA's Healthy, Hunger-Free Kids Act Implementation Plan. We also ask USDA to develop a simplified process for initial certification which ensures school districts have additional funds as soon as possible to ease financial pressure. Many schools districts are struggling with increased costs and other barriers to implementation and need to receive the additional reimbursements as quickly as possible.

Comments in Opposition to Specific Provisions of the Proposed or Recommending Changes in the Proposed Rule

1. United Fresh opposes restricting the amount of starchy vegetables, including white potatoes and corn, to only 1 cup per week in school lunch. We urge USDA to be more flexible regarding the amount of starchy vegetables that can be served every week in school lunch.

We oppose limiting the amount of starchy vegetables, including white potatoes, to only 1 cup per week. We believe that in some areas USDA's proposed rule has become overly restrictive and prescriptive, which will have negative consequences in achieving the overall goal of increased variety. The proposed rule should not be prescriptive with specific limits and numbers of servings of different types of fruits and vegetables, but should encourage schools to offer a wide of these products. We urge USDA to be more flexible and encourage schools to serve a greater variety of fruits and vegetables, but not to restrict starchy vegetables or other fruits and vegetables. Putting limits on starchy vegetables, including white potatoes, is inconsistent with the 2010 Dietary Guidelines and reduces the ability of school food officials to deliver healthy vegetables that provide key nutrients to children and at a serving cost that is manageable for schools.

It is important to note that the 2010 Dietary Guidelines for Americans do not limit or restrict starchy vegetables, including white potatoes. This is a significant change from the 2005 Dietary Guidelines and this change should be reflected in the proposed new school meal standards. For school age children, the 2010 Dietary Guidelines recommends 3 ½ cups–5 cups of starchy vegetables per week. As stated in the proposed rule, the goal of the new nutrition standards is to align school meals with the 2010 Dietary Guidelines. By statute, school meals should be consistent with the most recent dietary guidance and therefore should not restrict starchy vegetables, including white potatoes.

In providing schools flexibility, technical assistance should focus on preparation – that is, preparing vegetables and others foods in a nutrient-dense, low-fat form. If the issue is preparation, as USDA Secretary Vilsack recently noted in Congressional testimony, then USDA should urge schools to limit deep fried foods, not the healthy whole foods that can be prepared in different ways. There should be no limits or negative implications on white potatoes prepared in a nutrient-dense form such as baked, roasted, or boiled. Also, we do not believe it is USDA's intent to prohibit or

limit schools from preparing and serving starchy vegetables in combination with other vegetables in soups, stews and vegetable blends. There should be no limit placed on starchy vegetables served in combination with other vegetables. We urge USDA to correct this issue in the interim final rule. With appropriate preparation methods, there should be no limits placed on the number of times starchy vegetables can be served each week.

2. United Fresh is concerned the Proposed Rule promotes incorrect and damaging implications about certain healthy vegetables.

It is important that USDA rely upon nutrition science in all of its recommendations, and not further misconceptions that may be held about healthy vegetables such as white potatoes. White potatoes provide key nutrients to children, and are an excellent source of potassium and a good source of dietary fiber. Both potassium and dietary fiber are currently under consumed by children. Additionally, potassium and dietary fiber are two of the four “nutrients of concern” in the 2010 Dietary Guidelines. Potatoes have three times the potassium and a similar amount of fiber as a serving of broccoli and 50 percent more vitamin C and more potassium than a serving of spinach. Potatoes are the top source of potassium and fiber for high school students and the top source of vitamin B6 for all ages. Few vegetables contain the levels of potassium that potatoes do. Therefore, limiting the amount of potatoes served in school meals can have a negative impact on the intake of two of the four nutrients of public health concern.

Children also like potatoes. Limiting potatoes may lead to a reduction in overall vegetable consumption among school lunch participants. Potatoes are very popular with students and limiting the number of days they can be served may lead to reductions in overall vegetable consumption. The focus should be on serving nutrient-dense forms of potatoes and other vegetables to increase children’s overall vegetable intake.

We are also very concerned that restricting potatoes incorrectly teaches children (and school officials) that potatoes are not part of a healthy diet. This is a fallacy, and one that USDA should work hard to avoid as a science-based organization. Once again, the focus should be on preparation and serving children nutrient-dense forms such as baked, roasted and boiled potatoes to expose them to a wider variety of ways to prepare and eat this popular vegetable. Potatoes are also economical for schools to serve and an affordable, nutrient-dense choice. One serving of a baked potato can be provided for about \$.05. Given that the proposed rule will increase the overall cost of school lunch, and the Healthy, Hunger-Free Kids Act will provide only an increase of \$.06 per school lunch, it would be a major mistake to limit an affordable, nutrient-dense food that provides important nutrients for healthy development of children.

Finally, it is clear that school food officials do not support limiting starchy vegetables, like potatoes, and believe that they can serve a wide variety of vegetables each week without such limits. Of all the provisions in the proposed rule, the restriction on only serving 1 cup of starchy vegetables a week has caused great concern and debate among school food officials. At the recent School Nutrition Association Town Hall Meeting on the proposed rule, many school food service officials stated that they believed the restriction will increase costs and plate waste, are not necessary to improve vegetable diversity, and will not have a positive effect on student health. Schools need the flexibility to prepare meals that meet the nutritional goals

recommended in the proposed rule, are economically sustainable and will be consumed by school-aged children.

United Fresh agrees that children need to significantly increase vegetable consumption, and consume a wide variety of colorful vegetables each week, However, we do not believe restrictions and prescriptions are necessary to achieve these goals, and could in fact, be counter-productive.

3. United Fresh opposes the restriction that starchy vegetables, including white potatoes, cannot be served at breakfast. We urge USDA to be more flexible regarding the use of starchy vegetables in school breakfast and allow schools to substitute a starchy vegetable occasionally for some of the fruit.

The proposed rule allows other vegetables to be substituted for part of the fruit but does not allow starchy vegetables to be substituted. As discussed above, putting limits on starchy vegetables, including white potatoes, is inconsistent with the 2010 Dietary Guidelines and reduces the ability of school food officials to deliver healthy vegetables that provide key nutrients to children and at a serving cost that is manageable for schools

4. United Fresh supports IOM's preferred option for standards for meals selected by the student (offer vs. serve) that requires students to select 1 fruit at breakfast and 1 fruit or 1 vegetable at lunch, but also supports flexibility for schools as needed.

We agree with USDA's proposal to accept IOM's recommendation to promote the selection of fruits and vegetables in the SBP and NSLP under Offer vs. Serve (OVS). Given that 80-90% of children do not consume the recommended servings of fruits and vegetables, both IOM's preferred and alternative OVS options would better help school meals close that gap. We ask USDA to clarify the specific amount of fruit or vegetable that a student must select in order to count as taking the required fruit or vegetable. Does the student have to take 1 serving or 1/2 cup to meet this requirement? Does the student have to take the full fruit or vegetable required amount to meet this requirement? USDA's intent regarding the amount of fruit or vegetable that must be taken needs to be clearly stated.

We recommend that USDA adopt IOM's preferred option for OVS. However, USDA should allow school districts to the implement the alternative method upon request, should they determine the alternative method better meets the needs of their students. While we support USDA's rationale that the preferred option is more conducive to preserving the nutritional integrity of school meals, IOM's second alternative is designed to offer additional flexibility within the new system. This would allow students more choice and better control of the amount of food on their plate, and help to reduce calories and, in some cases, intake of fat and sodium from breakfast meats. The alternative option also would provide more flexibility for children to choose foods consistent with their cultural food preferences, religious requirements, allergies, and vegetarian diets.

Adopting IOM's second alternative provides a practical, cost effective way to increase the attractiveness of the school breakfast program for schools and children and reduce plate waste. IOM's second alternative still maintains nutritional integrity given the increased number of servings that must be offered in the new meal pattern compared to the existing pattern. At the same time, this alternative also secures the selection of fruits and vegetables.

Additional Recommendations

As USDA proceeds with the rulemaking process, United Fresh urges USDA to consider the following recommendations to ensure effective implementation of the new nutrition standards by the 2012-13 school year.

1. Training and Technical Assistance

We commend USDA/FNS for recognizing the importance of ensuring that school food service staff receives training and technical assistance to help them make necessary changes and improvements. We urge USDA to start now. The 2011-12 school year is a critical time for intensive training and technical assistance targeted specifically to schools that are in most need of help in implementing the principles of the Dietary Guidelines. Perhaps, State Child Nutrition programs should triage school districts before the end of this school year and immediately target training and technical assistance to those school districts most in need of improvement. After training, these school districts should be able to make steady, incremental improvements during the 2011-12 school year. We also urge USDA to proactively use the HUSSC designated schools as role models and examples of best practices in Webinars and education sessions at the School Nutrition Association Convention. Perhaps HUSSC schools could also become mentors to school districts needing the most improvement.

While we support the technical assistance topics proposed in the rule, such as updating USDA menu planning resources, providing guidance materials on fruits, vegetables, and whole grain foods, updating the Child Nutrition Database, and participation in public forums, we urge the agency to consider a more comprehensive and proactive approach to training and technical assistance. In addition, the implementation framework should not only target food service staff, but should include engagement with other agencies, both within and outside of USDA, as well as industry partners, to ensure full implementation.

2. Collaboration

We urge FNS to proactively collaborate with partners within USDA, outside agencies such as the Centers for Disease Control and Prevention and the Department of Education, and non-profit organizations to extend its reach and engage other important stakeholders in promoting healthy school environments. Today, many public health organizations, foundations, non-profits and others are seriously committed to and engaged in efforts to improve school food environments. As part of USDA's leadership, we urge the Department to proactively bring together other committed organizations to achieve a single goal over the next 1 ½ years – successful implementation of the new nutrition standards. We suggest collaboration with:

- Healthier US School Challenge (HUSSC) Schools and Team Nutrition Network - We are pleased that FNS plans to link the proposed meal standards with the HUSSC and Team Nutrition programs to expedite implementation. The 1,122 Healthier US Schools have already successfully implemented much of this proposed rule and hundreds more schools working towards certification have begun implementation. We urge USDA, through HUSSC, to identify successful programs and offer examples of effective strategies to help other schools with implementation. In addition, we strongly support the Team

Nutrition program and have been pleased that Team Nutrition funding has been used to support healthier school meals, as well as wellness policies and other approaches to improve school nutrition environments. We urge FNS to link Team Nutrition to implementation of the updated meal standards.

- SNAP-Education - The Supplemental Nutrition Assistance Program (SNAP) Nutrition Education program supports nutrition education and promotion efforts in schools across the country. We urge FNS to ensure that SNAP-ED funding used for school-based initiatives complements the training and technical assistance that will be provided to help school food service staff improve school meals.
- Centers for Disease Control and Prevention - CDC funds states and communities, many of which use funds for school-based programs. FNS should collaborate and coordinate with CDC to strengthen and extend school-based initiatives that promote healthy school nutrition environments. Also, many of CDC's Communities Putting Prevention to Work (CPPW) grants are focused on changing the school food environment, these best practices can be shared and incorporated into training programs.
- Department of Education - We encourage USDA to collaborate with the Department of Education to align DOE and USDA programs, such as the Healthier US School Challenge, Office of Safe and Drug Free Schools, and local wellness policy recommendations. We also encourage USDA and DOE to support collaboration at the state level for data and resource sharing so schools and districts can share the same information about nutrition and healthy school environments and receive similar tools and resources. This recommendation is especially important for states that have child nutrition programs in separate departments or agencies.
- Alliance for a Healthier Generation; Action for Healthy Kids - We encourage USDA to collaborate with organizations currently working to improve school nutrition environments, such as the Alliance for a Healthier Generation and Action for Healthy Kids. The Alliance for a Healthier Generation's Healthy Schools Program is working with 11,000 schools. USDA and Alliance efforts should complement each other, extending the reach of technical assistance to more schools and avoiding duplication. The Alliance can also provide examples of schools that have successfully improved the healthfulness of school meal and serve as models for other schools to support implementation. We urge USDA to encourage schools to use tools and resources created by credible non-governmental organizations to support and build healthy school environments.
- State and City Agencies - We encourage USDA to actively engage with state and city agencies that are actively address school meals in their local communities.
- The Culinary Institute of America (CIA) – We encourage USDA to actively engage with the CIA in its work with corporate executive chefs, restaurant chefs and school chefs to develop appealing recipes for kids that include more fresh fruits and vegetables. In May 2011, the CIA will host "Healthy Flavors, Healthy Kids: A National Initiative to Improve the Health of Children and Young People through Food Education, Culinary Strategy and Flavor Insight" in San Antonio, Texas. The results of this conference and previous CIA "Healthy Flavors, Healthy Kids" conferences should be shared with the broader school food community to accelerate adoption of culinary strategies and R&D that will bring the new school meals nutrition standards to life.

3. Cafeteria equipment and infrastructure

We agree with USDA and IOM that many school food authorities need to purchase additional cafeteria equipment and kitchen tools in order to meet the proposed meal patterns. Specifically, to serve a greater variety and volume of fruits and vegetables, many schools need to buy refrigerators, sinks, salad bars, steamers, etc. Schools need additional resources to purchase cafeteria equipment that is often very expensive. We urge USDA to explore government funding, and to engage with foundations and private sector organizations to secure resources for school cafeteria equipment.

Evidence that schools need additional resources for cafeteria equipment can be found in every state and in tens of thousands of schools nationwide. Currently, State Child Nutrition Divisions have funding applications for cafeteria equipment from low-income schools totaling \$525 million. The \$100 million provided through the 2009 American Recovery and Reinvestment Act Equipment Grants and the \$25 million provided through the Child Nutrition Reauthorization extension were critically important resources to schools. This was the first federal funding for school kitchen equipment in over two decades. Application requests for this funding totaled \$650 million, which provides a clear indication of unmet need among schools. Schools are eager to replace antiquated cafeteria equipment with new equipment that will help them serve healthier foods. Given the deficit and budget concerns in Congress, we urge USDA and their NGO partners to make resources for cafeteria equipment a top priority. The *Let's Move Salad Bars to Schools* initiative has pledged to donate 6,000 salad bars to schools nationwide over the next three years to increase access to a variety of fresh fruits and vegetables. Other equipment is also desperately needed in schools. Securing additional resources for school cafeteria equipment can free up money so schools can purchase better quality food for students to meet the new meal standards.

4. Nutrition Promotion

In addition to the training and technical assistance outlined in the rule, we believe it will be critical for FNS to ensure that effective promotion and marketing strategies are integrated into efforts. For example, it is not enough to update materials and databases for menu planning and procurement for school food service staff. Marketing and promotion are critical to ensuring that menus are developed and meals are prepared and promoted in ways that engage and appeal to students. We urge FNS to include a strong marketing and promotion component in training and technical assistance efforts.

Schools should implement social marketing campaigns to increase the appeal of healthy school meals to students. USDA also should support these efforts through other USDA nutrition programs, such as SNAP-Ed. Creating synergy between USDA programs increases their effectiveness and maximizes federal nutrition resources.

We commend USDA for acknowledging cultural preferences as a cardinal element in helping children to eat more fruits, vegetables, whole grains, and leaner protein foods. The first step is schools offering healthier options; getting students to select and consume healthier school meals is the second. It will be essential for USDA to assist schools in identifying and using culturally appropriate fruits, vegetables, and other foods in school menus. The proposed rule encourages schools to consider the

cultural food preferences of students, which could be one effective strategy to help ensure students find tasty, attractive and acceptable options.

The cafeteria is often viewed as the place where lessons learned in the classroom can be applied. Marketing and promotion efforts should include collaboration and coordination with classroom-based learning to ensure that students recognize and can actively apply the information they gain in their academic lessons to the food and beverage options available in the cafeteria. Schools need model materials, curricula, and encouragement to implement this approach.

We encourage USDA to conduct a review of best practices for increasing students' fruit and vegetable consumption and to share this information with school food service officials. Since 2002 the Fresh Fruit and Vegetable Program has introduced a wide variety of fresh fruits and vegetables to several million elementary school students; many of these fresh fruits and vegetables are now being served daily at lunch in these same schools. Children like fresh fruits and vegetables and will eat them when great tasting fruits and vegetables are served. Many states have also successfully implemented the *Fruit and Vegetable Harvest of the Month* program to introduce students to a fresh produce item, such as cauliflower, Brussels sprouts, blueberries, salad greens, sugar snap peas, and etc. every month. The Fresh Fruit and Vegetable Program and the Harvest of the Month inspire children to try new fruits and vegetables and increase their overall consumption. Nutrition Services can provide nutrition education resources for teachers and families that coordinate and reinforce these new fruits and vegetables to improve family eating habits.

FNS and the National School Food Service Management Institute (NFSMI) have a multitude of excellent resources, such as "Fruits and Vegetables Galore: Helping Kids Eat More" which include detailed information on how to promote and serve fruits and vegetables in school meals. FNS must ensure that existing materials are accessible and that greater emphasis is placed on the marketing and promotion components. FNS and NFSMI should lay out a timeline and strategy to help schools address all major changes and challenge areas in the new meal patterns.

Conclusion

United Fresh commends USDA for proposing important changes to the nutrition standards for the National School Lunch and School Breakfast Programs that align with the 2010 Dietary Guidelines.

In the final rule, we urge USDA to provide greater flexibility to schools in meeting recommendations to increase the variety of fruits and vegetables offered. This specifically must avoid restrictions on healthy starchy vegetables, including white potatoes, and rather focus schools on method of preparation and serving nutrient-dense forms of these vegetables.

Finally, we urge USDA to implement the new meal standards by the 2012-13 school year. Because increased meal cost is a critical issue impacting implementation, we also urge USDA to quickly provide rules that qualify schools and deliver increased reimbursement upon compliance with the new meal patterns, as well as consider other policy levers that can shift more resources to the food component of the meal.

Thank you for the opportunity to contribute to shaping the new school meal standards that will benefit 32 million children everyday. Please contact us if you have any questions about any of our comments.

A handwritten signature in black ink that reads "Lorelei DiSogra". The signature is written in a cursive, flowing style.

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