


Primer on US Food and Nutrition Policy and Public Health: Protect School Nutrition Standards

 See also Nestle, p. 985; Miller et al., p. 986; Brownell et al., p. 988; and Concannon, p. 991.

This section of the Food and Nutrition Policy Primer deals with the integrity of school nutrition standards. This is one of the three pillars of food policy along with preventing food insecurity (Brownell et al., p. 988) and fostering agricultural sustainability (Miller et al., p. 986).

The school nutrition environment is the healthiest it has been in decades, and the current administration's regulation rollbacks threaten this achievement. The federal school lunch program feeds more than 30 million American children each school day, and the application of empirically based nutrition standards to both practice and policy must be protected from political and industry influences.

2010 HEALTHY HUNGER-FREE KIDS ACT

As directed by the 2010 Healthy Hunger-Free Kids Act (HHFKA; Pub L No. 111-296), the US Department of Agriculture (USDA) updated the nutrition regulations for the National School Lunch Program, School Breakfast Program, Child and Adult Care Food Program, and Smart Snacks (i.e., snacks available outside of school meals) to align with the Dietary Guidelines. The HHFKA school lunch regulations increased fruits and vegetables, whole grains, and fat-free and low-fat milk, and

decreased sodium, saturated fat, and trans fat. In addition, calorie maximums for meals were set by age group. The new regulations have worked—the nutrient density of lunches has increased and energy density has declined.¹

All students have benefited from the HHFKA changes because updated nutrition standards apply not only to the school meals but also to food throughout the school building. The Smart Snack nutrition standards apply to all foods and beverages sold outside school meals (e.g., a la carte, vending, and fundraisers), as well as foods marketed on school property. This is critical because the food industry uses branded curriculum materials and fundraising programs in schools to develop brand loyalty among students.

The food industry lobbied successfully against some of the proposed changes in 2012. Initially, the USDA proposed limiting starchy vegetables (e.g., potatoes) to one cup per week to promote a greater variety of vegetables. This measure was supported by a national study that found that students in elementary schools that served french fries more than once a week had a significantly higher likelihood of obesity.² However, the National Potato Council pushed back, and members of Congress helped potatoes stay in school meals.³

Another struggle concerned tomato paste and pizza. Historically, tomato paste has been credited on the basis of the whole

tomatoes that went into the paste, while other purees have been credited by volume served. The USDA attempted to close this loophole, but the companies that produce school pizza protested. Congress protected industry interests through an appropriations bill, and pizza sauce continues to count as a vegetable serving.⁴

THE NEW USDA COURSE

Despite this vigorous industry pushback, the policies in place at the end of the Obama administration signified tremendous progress in school nutrition. However, on December 6, 2018, the USDA reversed course by reintroducing 1% flavored milk, weakening the whole grain requirements, and ending a plan to progressively reduce sodium over several years.⁵

Secretary of Agriculture Sonny Perdue claimed that children were not eating the healthier school meals, and food service authorities needed the flexibility. His position appears to have been heavily influenced by the School Nutrition Association, because the whole grain

and sodium regulation rollbacks were identical to those requested in the 2018 School Nutrition Association's legislation and policy position paper.⁶

There are several problems with the School Nutrition Association and USDA position. First, research shows that children are eating the healthier meals, and the proportion of school lunches consumed versus wasted has not changed.⁷ Second, the argument that schools need more flexibility is contradicted by the public comments submitted in response to the proposed rules released in 2017. The USDA received 86 247 comments and 96% opposed the School Nutrition Association and USDA position by indicating that flexibilities were not needed because of widespread compliance with existing standards. Third, school meals must retain strong sodium and whole grain standards to align with the Dietary Guidelines and help children meet their nutritional needs.

Children consume too much sodium. The Tolerable Upper Intake Levels for sodium established in the Dietary Reference Intakes is 1900 to 2300 milligrams per day for children aged 4 to 18 years. The average school lunch (just one meal for the day) contains an average of 1377 to 1588 milligrams, approximately 70% of the daily total. This is why in 2009 the National Academy of Medicine recommended that by 2020 a lunch contain no more than

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one third of the child's daily Dietary Reference Intake for sodium. The 2011 USDA-proposed rule set the more gradual goals of three progressive targets by 2014, 2016, and 2022, but this administration's recently released rule pushes target 2 to 2024–2025 and eliminates the final target altogether. The USDA now argues that it is prudent to wait for the 2020 Dietary Guidelines; however, this is entirely unnecessary in light of robust science and existing recommendations.

Children also do not consume enough whole grains. The Dietary Guidelines recommend that at least half of the grains we eat should be whole grains. In 2012, at least half of the grain products served in schools had to be “whole grain-rich” (i.e., contain more than 50% whole grains), and, by 2014, all grains served needed to meet this standard. Exemptions were allowed for districts demonstrating hardship in meeting the requirement, and in 2017–2018, about one quarter of all school districts requested

exemptions. Yet, the other three quarters did not ask for exemptions and were presumably serving only whole grain-rich products. The recently released rule eliminates the requirement to request an exemption, effectively allowing all districts to go back to the 2012 policy that only half of the grains served must be whole grain-rich.

Finally, beyond the school building, strong school food nutrition standards provide an incentive for the food industry to invest in reformulation. This occurred when the USDA released the Smart Snacks standards for competitive foods. Major companies created “look alike” versions of popular brands so they could continue to be sold in schools. The weakened school meal standards not only allow less nutritious products in schools today but also decrease the motivation for food manufacturers to create products with less sodium and more whole grains for schools to serve in the future.

Federal nutrition policies influence what millions of American

children eat at school every day. In spite of the recent steps backward by this administration, the foods available today in schools are significantly healthier than those served before the HHSFKA, but the threat of further backsliding remains. We must continue to support the integrity of the national child nutrition programs by using science to inform this critical area of public policy. **AJPH**

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M. B. Schwartz drafted the editorial and K. D. Brownell and D. L. Miller provided feedback and edits.

CONFLICTS OF INTEREST

The authors declare no conflicts of interest.


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Primer on US Food and Nutrition Policy and Public Health: *Kevin Concannon Comments*

 See also Miller et al., p. 986; Brownell et al., p. 988; and Schwartz et al., p. 989.

Three articles included in this issue of *AJPH* reflect current policy, practice, and opportunity in the public health, food, and nutrition arena. The timeliness of these articles is most welcome given the recent legislative accomplishments of the US Congress in its work on the 2019 Fam Bill, which was passed without major cuts to the Nutrition Title as previously proposed by

the US House of Representatives in the 2018 version. And, on the equally hopeful side, there are early indications that both committees of the House and Senate intend to proceed on anticipated reauthorization of child nutrition programs.

As noted in the primer on US Food and Nutrition Policy, the reach of these principal federally sponsored domestic food programs has major public health

impacts by reducing hunger and food insecurity while increasing healthy nutrition and related benefits for millions of Americans. Table 1 lists the programs and their budget for 2019. The Supplemental Nutrition Assistance Program (SNAP)

serves more than 40 million individuals monthly, and its beneficiaries include children and adults—from newborns to our most senior citizens. SNAP remains one of the strongest components in domestic safety net and public health programs. Its enrollment numbers are significantly affected by the strength and contemporary state of the US economy as well as policy elements.

The Special Supplemental Nutrition Program for Women, Infants and Children program

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