


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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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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TABLE 1—Programs of the US Food and Nutrition Service and Their Allocated Budgets for 2019

Program Name and Abbreviation	Fiscal Year 2019 Budget, \$
Supplemental Nutrition Assistance Programs (SNAP)	73 218 300,000.00
National School Lunch Program (NSLP)	12 091 834,000.00
Women, Infants, and Children (WIC)	6 005 000,000.00
School Breakfast Program (SBP)	4 816 238,000.00
Child and Adult Care Food Program (CACFP)	3 815 328,000.00
Summer Food Service Program (SFSP)	519 456 000.00
The Emergency Food Assistance Program (TEFAP)	306 083 000.00
Commodity Supplemental Food Program (CSFP)	238 120 000.00
Fresh Fruit and Vegetable Program (FFVP)	176 000 000.00
Senior Farmers' Market Nutrition Program (SFMNP)	20 600 000.00
Farmers' Market Nutrition Program (FMNP)	18 548 000.00
Team Nutrition	17 004 000.00
Special Milk Program (SMP)	8 065 000.00
Food Distribution Program on Indian Reservations (FDPIR)	998 000.00

Source. Adapted from <https://www.obpa.usda.gov/32fns2020notes.pdf>.

(WIC) is the second largest domestic nutrition and health program and is one of the nation's most effective public health programs. Its impact on such a large number of infants and their mothers each year is a potent example of broad public health policy, health promotion, and future health care cost avoidance. Furthermore, WIC has the notable feature of serving all infants across the country who qualify under its income eligibility guidelines regardless of residency status. In communities across the United States, WIC works in tandem with SNAP, resulting in

approximately half of WIC households qualifying for and receiving SNAP benefits.

As I noted, child nutrition legislation is expected to be the subject of congressional hearings this year, with the intention of updating and reauthorizing the Healthy Hunger-Free Kids Act of 2010 (HHFKA). The principal components of the HHFKA are WIC, the National School Lunch Program, the School Breakfast Program, and several smaller adjunctive nutrition programs.

The National School Lunch Program (NSLP) is provided daily in almost 100 000 US schools—from pre-K through

grade 12. With updated nutrition policies and menu standards, it has resulted in a demonstrably improved food and nutrition environment in US schools. The NSLP directly feeds some 30 million students each day and, through the School Breakfast Program, serves close to half that number in school breakfasts. The stronger nutrition standards required by the HHFKA have been implemented in all participating schools and embraced by most parents and educators, professional nutritionists, pediatricians, and school nurses. However, these are aspects of the HHFKA school meals requirements that are not supported by the food industry and significant numbers of school food service representatives.

Considering both Farm Bill and child nutrition programs in the HHFKA, close to \$100 billion is expended in these specific federal nutrition programs annually. It is obvious that practice and policies supporting food sustainability can be furthered at various stages in the growth, harvesting, processing, and presentation of foods. Using financial support and incentives through these core federal food and nutrition programs can incentivize sustainable food practices.

Diversification of crops, conservation practices, and more

careful use of water, soil, and chemicals are essential to achieving food sustainability. Specific changes in practices and monitoring are required at all stages in the growth, harvesting, processing, and consumption of foods. The significant dollar impacts and associated regulatory influences of federal programs can be aligned to support food sustainability. Government policy and nongovernment farm and producer interests can also align to better support food sustainability.

On matters of nutrition and sustainable food systems, voices urging action in the public health community here in the United States and beyond are being raised. Earlier this year leading experts published a major report with recommendations in the EAT-Lancet Commission on Healthy Diets from Sustainable Food Systems. This report is prompting needed discussions and proposed steps forward at various levels in the farm, food, and nutrition communities across many countries. It is very early in these discussions, but they have begun and they deserve engagement by all of us. **AJPH**

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CONFLICTS OF INTEREST

The author has no conflicts of interest to declare.

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