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March 10, 2008

TO: School Food Service Directors/Managers

FROM: Frances N. O'Donnell, Coordinator

SUBJECT: Incorporating the 2005 Dietary Guidelines for Americans into School Meals

The [Dietary Guidelines for Americans \(DGA's\)](#) serve as the foundation for national nutrition policies, including the meal patterns and nutrient standards of the USDA Food and Nutrition Service (FNS) school meals programs. As you are aware, the Child Nutrition and WIC Reauthorization Act of 2004 (P.L. 108-265) amended section 9(a) of the Richard B. Russell National School Lunch Act to require that the Secretary issue guidance to increase the consumption of foods and food ingredients that are recommended for increased serving consumption in the most recent Dietary Guidelines for Americans. This memorandum provides guidance to incorporate the applicable recommendations of the 2005 DGAs into the National School Lunch Program (NSLP) and the School Breakfast Program (SBP).

Following the release of the 2005 DGAs, USDA assembled an internal working group of experienced nutritionists and program administrators to examine ways to implement the 2005 DGAs into the school meals programs, within group feeding limitations and cost restrictions, in preparation for beginning the rulemaking process. Given the complexity of issues uncovered during this process, USDA decided to contract with the Institute of Medicine (IOM) to convene a panel of experts from diverse specialties in child nutrition. This expert panel will provide USDA with recommendations to update the meal patterns and nutrition requirements for both the NSLP and the SBP. Once a cooperative agreement is signed, USDA estimates that it may take IOM from 18 to 24 months to provide the Department with these recommendations. USDA will then engage in the formal rulemaking process to promulgate a proposed rule that incorporates the IOM recommendations to the fullest extent practicable.

While awaiting a formal rulemaking, school food authorities (SFA's) are strongly encouraged to begin proactively implementing the applicable recommendations of the 2005 DGAs within the current meal pattern requirements and nutrition standards. Gradual implementation provides an opportunity for students to develop a taste for new items and/or modified recipes. Regardless of the menu planning approach being used by your SFA, you should be promoting increased consumption of whole grain foods, fruits and vegetables and fat-free or low-fat milk and dairy products.

FOOD GROUPS TO ENCOURAGE

WHOLE GRAINS

- ◆ Increase the amount and variety of whole grain products offered to students, and progress toward the goal of making half of all grains offered and served, whole grains.

The consumption of whole grains is strongly encouraged in the 2005 DGAs; one of the key recommendations states, "In general, at least half of the grains should come from whole grains." The Food

and Drug Administration, in draft industry guidance released after the publication of the 2005 DGAs, has defined whole grain as, “cereal grains that consist of the intact, ground, cracked or flaked caryopsis [kernel], whose principal anatomical components- the starchy endosperm, germ and bran – are present in the same relative proportions as they exist on the intact caryopsis.” According to the 2005 DGAs, the whole grain should be the first item listed in the ingredient statement in order for a product to be considered a whole grain; for many whole grain products, the words “whole” or “whole grain” appear before the grain ingredient’s name in the ingredient statement. Examples of common whole grains can be found in [Table 7](#) of the 2005 DGAs document.

FRUITS AND VEGETABLES

- ◆ Increase the availability and service of both fruits and vegetables within the school meals programs.
- ◆ In the NSLP, SFAs should provide meals that offer both a fruit and a vegetable, regardless of the menu planning approach being used.

One of the key recommendations in the 2005 DGAs is to, “Choose a variety of fruits and vegetables each day. In particular, select from all five vegetable subgroups (dark green, orange, legumes, starchy vegetables, and other vegetables) several times a week.” Fruits and vegetables, as well as vegetable subgroups, offer somewhat different combinations of nutrients; thus, consuming a variety of each is important for a well-balanced diet.

MILK

- ◆ Offer only low-fat (1% or less) and fat-free milk in the school meal programs for all children above the age of two.

The 2005 DGAs include a recommendation to consume fat-free and low-fat milk and milk products on a daily basis, with a key recommendation stating, “Consume three cups per day of fat-free or low-fat milk or equivalent milk products. Children two to eight years should consume two cups per day of fat-free or low-fat milk or equivalent products.” The recommendation for low-fat and fat-free milk/milk products does not apply to children younger than two years of age. Statutory requirements necessitate offering fluid milk in a variety of fat contents in the NSLP; this requirement can be met by offering both low-fat and fat-free milk. Higher fat milks are unwarranted for children older than two.

NUTRIENTS WITHOUT CURRENT REGULATORY BENCHMARKS

SODIUM

- ◆ Begin reducing sodium incrementally, with a long-term, step-wise plan for meeting the DGAs recommendation.

For the first time, the 2005 DGAs have set a quantitative upper limit on daily sodium consumption. A key recommendation of the document is, “Consume less than 2,300 mg (approximately 1 tsp of salt) of sodium per day.” Previous versions have encouraged reduction of sodium intake, without providing a numeric target. Since past DGAs have not provided a quantitative sodium recommendation, neither have the school meals programs. However, SFAs have long been encouraged to reduce sodium in foods offered/served, and sodium levels have been monitored during School Meals Initiative reviews. Recommendations have been provided when levels are more than 1500 milligrams.

Current DGA recommendations are substantially lower than the average American's daily intake. Since sodium is a common preservative, as well as a distinct flavor enhancer, successfully shifting the American palate toward no more than 2,300 mg per day will require concerted effort across all food systems. SFAs are encouraged to establish and commit to a plan that would reduce the sodium levels in school meals incrementally; a gradual, long term approach to meet the DGAs recommendations will allow students' palates and the product marketplace the necessary time to adjust.

FIBER

- ◆ Plan meals that provide fiber at levels appropriate for each age/grade group that reflect the 2005 DGAs recommendation.

The 2005 DGAs are the first to quantify a daily fiber recommendation: "The recommended dietary fiber intake is 14 grams per 1,000 calories consumed." Previous versions of the DGAs simply encouraged increased fiber intake, without specifying a numeric target. Hence, the nutrient standards of school meals followed suit by encouraging consumption without requiring a minimum level.

Now that a specific intake target has been published in the DGAs, SFAs are encouraged to move toward this target. Even SFAs that have been meeting recommended benchmarks for fiber over the past few years will likely need to increase fiber to meet the DGA level. For example, school meals planned to meet the nutrition requirements for the Grade IV age/grade group in the Traditional Food Based Menu Planning Approach should offer meals that, on average over a school, provide at least 11 grams of fiber based on the minimum caloric requirement of 785 calories. Fiber levels have been monitored by NYS during School Meals Initiative reviews. Recommendations have been provided when levels are less than 5 grams.

Fiber is found naturally in fruits, vegetables (particularly legumes) and whole grains; these food groups can be significantly, but gradually, increased in schools meals. Gradual increase now, will allow students' palates to adjust and will make the transition to a numeric fiber target easier. Fruits can be served without the addition of salt, butter or sauces; the addition of whole fruits as a choice in school menus will increase fiber while reducing sodium.

CHOLESTEROL

- ◆ Plan meals that, on average over a school week, provide less than 100 mg of cholesterol at lunch and less than 75 mg of cholesterol at breakfast for all age/grade groups.

The current nutrition requirements for both lunch and breakfast encourage schools to reduce cholesterol levels. A maximum threshold has not been established because the previous version of the DGAs encouraged low cholesterol intake, but did not specify a numeric target. A key recommendation of the 2005 DGAs, however, is to consume "less than 300 mg/day of cholesterol." SFAs are encouraged to plan menus that, on average over a school week, do not exceed more than one-fourth of the daily recommendation at breakfast and no more than one-third of the daily recommendation at lunch. Data from the third School Nutrition Dietary Assessment study (SNDA-III) indicate that many SFAs are already offering meals at or below levels that reflect the 2005 DGAs recommendation (i.e., 100 mg for lunches and 75 mg for breakfast). Cholesterol levels have been monitored by NYS during School Meals Initiative reviews. Recommendations have been provided when levels are more than 150 milligrams.

TRANS FAT

- ◆ Plan meals that minimize trans fats.

The 2005 DGAs represent the first discussion of trans fats in national nutrition policy. A key recommendation of the document includes, “keep trans fatty acid consumption as low as possible.” While a numeric target is not included SFAs are encouraged to be cognizant of trans fats in all foods that are offered/served and to work toward minimizing these unhealthy fats.

SUMMARY

While awaiting publication of the final rule updating the school meal patterns and nutrition standards, SFAs should begin to proactively implement the 2005 DGAs. Implementation can be accomplished through a variety of initiatives such as:

- ◆ Increase whole grains
- ◆ Increasing both fruits and vegetables
- ◆ Offering only low-fat and fat-free milk/milk products
- ◆ Reducing sodium
- ◆ Increasing fiber
- ◆ Controlling cholesterol
- ◆ Minimizing trans fats.

USDA is in the process of developing technical assistance tools that will further assist schools in meeting the 2005 DGAs; these tools will be distributed as they are finalized.

Thank you for your dedication and cooperation in ensuring that Child Nutrition Programs deliver the best possible nutrition service to the Nation’s children.