

## The Proposed Rule: Key Changes

### *Menu Planning Changes*

- **Food-based menu planning approach**  
Under the proposed plan all schools will be required to move to a food-based menu planning approach. Menu reviews will include verification of specific food groups as well as an analysis of calories, sodium, saturated fat and trans fats.
- **Same age/grade group for planning school meals**  
Under the proposed rule, schools must have separate meal requirements for distinct age/grade groups. Groups will include Kindergarten – 5<sup>th</sup> grade, 6<sup>th</sup> grade – 9<sup>th</sup> grade, & 10<sup>th</sup> grade – 12<sup>th</sup> grade.
- **Fruit and vegetable components are offered as separate components**  
The proposed rule calls for fruits and vegetables to be counted as separate food components when determining a reimbursable meal.

### *Menu Changes*

- **1% unflavored milk (white) and fat free unflavored or flavored milk (chocolate, etc.)**  
Under the proposed rule, only 1% (low-fat) unflavored milk is allowed. Flavored and unflavored milk are allowed if fat-free/ skim. This means that all flavored milks must be fat-free or skim. All grade levels are required to provide 5 servings of milk per week (or 1 serving/day) during lunch.
- **Daily vegetable serving at lunch**  
Vegetables will be required to be served at lunch daily. Similarly to fruits, fresh vegetables should be served whenever possible. In addition, there will be new weekly requirements of dark green vegetables, orange vegetables, and legumes and limitations on starchy vegetables.
- **Daily fruit serving at breakfast and lunch**  
The proposed rule will require fruits to be offered at breakfast and lunch daily. Additionally, fruits should be fresh whenever possible. Frozen and canned fruits should be packed in natural juice, water or light syrup whenever possible.
- **More whole grains**  
The proposed rule requires that at least half of grains served be whole grain rich. By year two of implementation, all grains are required to be whole grain. Up to one serving per day would be allowed to be grain based dessert.

## *Nutrition Changes*

- **Minimum and maximum calories per meal**  
Currently, minimum calorie requirements are in place. The proposed rule will also add maximum amounts of calories per meal. These calorie recommendations will be a range that is customized to each meal and age/grade group.
- **Tighter restrictions on saturated fat and trans-fat**  
The proposed rule will require stricter control over foods with saturated fats and trans fats. Under this new rule, less than 10% of calories will be allowed from saturated fat at each meal. Additionally, all trans fat foods will be eliminated from the menu.
- **Limitations on sodium content**  
A new policy on reducing sodium content will be likely be implemented according to the proposed rule. This is the first sodium restriction will be implemented with school nutrition policy. Given that the sodium content of many foods is difficult to change, it is not expected sodium requirements will be until 10 years post implementation.

## *Additional Changes*

- **Offer vs. Serve- Students must select a fruit or vegetable**  
Currently, students are not required to take a fruit or vegetable as long as they take the minimum number of meal components. Under the newly proposed rule, students must take at least one fruit or vegetable at each meal.
- **Shorter (or Increased) Review Cycle**  
Under the proposed rule the CRE and the SMI will be combined into one review that is conducted every three years. Details of the new review are forthcoming.
- **Increased Rates of Reimbursement**  
In order to offset the increased costs of additional fruits, vegetables, and whole grains added to the menu, the proposed rule calls for an additional \$0.06/meal reimbursement for districts that have demonstrated compliance with the new regulations.

## *For Additional Information*

- Visit the SquareMeals.org website under the Resources tab or go directly to the document at <http://www.fns.usda.gov/cnd/governance/regulations/2011-01-13.pdf>.

# **Are You Ready for the Rule?**

## **The Proposed Rule to Update School Lunches and Breakfasts**

Background: The proposed rule was published on January 13, 2011 in the Federal Register (76 FR 2494) followed by a 90-day comment period that ended on April 13, 2011. The rule is based on the Institute of Medicine Report titled "School Meals: Building Blocks for Healthy Children (October, 2009)." Currently, the United States Department of Agriculture (USDA) is reviewing and summarizing the comments provided by the public. Based on the comments received, USDA will likely develop an interim rule, followed by a final rule. USDA will then work with state agencies to facilitate implementation of the rule by providing technical assistance and materials. Below is an outlined guide to help you get ready for the rule.

### *First Steps:*

I. **Become familiar with the proposed rules** (timeline: by end of 2010-2011 school year)

Take time to read what USDA has proposed and start to consider how these changes will *benefit* your school and the students you serve. While there is no way to know what the final changes will be – it is highly likely that many aspects will be adopted and being educated and informed will help you and your staff feel confident and prepared for what lies ahead.

II. **Assess current resources** (timeline: before the start of 2011-2012 school year)

Gather information on products that are currently available that line up with the recommendations (this includes USDA foods as well as those available in specific regions of Texas)

- Low Sodium
- Whole Grain Rich
- Low Fat and Low Saturated Fat
- Dark green, yellow, red & orange vegetables
- Fresh and Dried Fruit

III. **Start Changing Menus** (timeline; before December Holiday Break 2011)

#### **Begin a slow reduction of sodium**

As we know- removing sodium from foods can have an impact on flavor. Try to make adjustments to current recipes that slowly reduce sodium and increase flavor with herbs and spices. When changes are gradual they will be less noticeable to the students.

#### **Increase whole grains**

There are more and more whole grain products available on the market each year. Try switching to brown rice, whole grain bread and rolls, as well as whole grain pasta. Students often do not notice a change- however introducing whole grain items slowly by mixing them with non-whole grain products to let students' taste adapt to the flavor and texture will help.

### **Increase dark green and orange/red vegetables**

Vegetables from these sub-categories provide students with a unique nutrient profile that can have a significant impact on their overall nutrition. The 2010 Dietary Guidelines for Americans have identified that children and adults do not get enough of these vegetables and school meals can be an excellent source. Consider starting by adding dark greens to salads such as romaine lettuce or spinach, are simply increasing items such as carrots, broccoli and even sweet potatoes.

### **Increase variety of vegetables**

Our students need a wide variety of vegetables to ensure that they are getting the nutrients they need for proper growth and development. Take a look at your current menu- do you see a wide variety of vegetables or do you see many of the same including peas, potatoes, and carrots. Start thinking about how you can *shake things up*. Consider replacing these items with the colorful vegetables discussed above or challenge staff to create new and exciting recipes.

### **Be informed about FAT**

The proposed guidelines require that products contain zero grams of trans fat per serving. Double check the labels in the products that you currently purchase- you may be surprised to find that most are trans-fat free. You will also want to pay attention to saturated fat and make sure that all foods and beverages are below 10% of calories from saturated fat. For support and to learn more about fat, contact the child nutrition staff in your Education Service Center (ESC).

### *Next Steps for 2011-2012 School Year*

#### **1. Get the students involved**

Start the conversation about the importance of healthy eating and why you are choosing to make changes. If you are interested in adding new items to your menu but are unsure what will be acceptable- try testing small batches during the lunch time. Set out small samples for students to try for free and gather input. These are our customers so let's get them involved!

#### **2. Conduct Self-Inventory (see attached form)**

Create a list of where you are at currently and where you would like to be. It may be beneficial to conduct a nutrition analysis of the menus you currently use. Once completed, try to identify the changes that will be easiest and those that will require the most innovation. This is also an opportunity to identify training needs

#### **3. Identify Short and Long-Term Goals**

After doing your self assessment you may find that your school has already made many of the suggested changes- great! Regardless of your current status, we know there is always room for improvement. Think about what changes you can start to make in the short term and begin planning for those that will take a bit longer. This is also a good time to work with your ESC child nutrition staff for support in making changes while remaining in line with the current program guidelines.

#### **4. Begin the discussion locally**

- Inform administrators of the proposed changes
- Inform parents/students
- Develop a local plan of action
- Involve all stakeholders to increase support
- Communicate with other districts in your region

## **5. Take the HealthierUS School Challenge!**

Begin to move your menus and policies in line with the HUSSC guidelines. This will help to bring the program in line with the 2005 Dietary Guidelines as well as many aspects of the Proposed Rule. HUSSC award winners receive financial rewards and community recognition

### **A Word of CAUTION!**

Please keep in mind that the proposed changes have not been set into law, and all entities are required to comply with the current USDA guidelines until the final rule actually goes into effect.

Specific areas to watch and wait:

- **Meat/Meat Alternate:** Moving towards the proposed M/MA requirement for the 4-8<sup>th</sup> grade group. The proposed requirements would not be in compliance with the current regulations at this time. All schools will need to wait until the rule is out before making this change.
- **Calories:** Currently, the proposed minimum calorie level would not be in compliance with current regulations.
- **Fat:** The proposed rule allows for 25-35% calories from fat, which is not compliant with the current regulation of 30% fat.

“The change from rules to reality starts with you”

### **Additional Summer Reading:**

1. **Nutrition Standards for Food in Schools, Leading the Way Toward Healthier Youth.** Institute of Medicine of the National Academies, Committee on Nutrition Standards for Food in Schools Food and Nutrition Board. Edited by Virginia A. Stallings and Ann L. Yaktine.
2. **Dietary Guidelines for Americans, 2010. Executive Summary and Policy Document.** <http://www.cnpp.usda.gov/DGAs2010-PolicyDocument.htm>
3. **School Meals: Building Blocks for Healthy Children, 2008.** Institute of Medicine. Commissioned by the United States Department of Agriculture.

