

**Testimony on
Examining the Cost of Federal Decisions on School Meal Programs
before the
Subcommittee on Early Childhood, Elementary and Secondary Education
of the
U.S. House of Representatives
by
Sally Spero, SNS, Food Services Planning Supervisor
San Diego Unified School District
May 13, 2011**

Good morning, Chairman Hunter, Congressman Kildee, and members of the Subcommittee. I am Sally Spero, Food Services Planning Supervisor of the San Diego Unified School District (SDUSD). I have worked in the school nutrition field for over twenty-five years and have served in my present capacity for fourteen years. Thank you for the opportunity to testify on the impact of the proposed school meals requirements and the recent Child Nutrition reauthorization.

The San Diego Unified School District is the 7th largest school district in the nation serving over 132,000 students, 60% of which are eligible for free and reduced price school meals. Guided by our leader Gary Petill, we serve over 24 million meals and snacks yearly.

We have much to be proud of in our district. Our award-winning Kid's Choice Cafe established a salad bar program in each elementary school and shows students that "It's Cool to Eat at School". We were among the pioneers of the Breakfast in the Classroom program, dramatically increasing breakfast participation for needy children. Our summer lunch program, the Summer Fun Cafe, has grown from serving 11,000 lunches in Summer 2004 to serving over 250,000 lunches during Summer 2010. In Fall 2009, the SanDi Coast Cafe brought a new approach to serving food to high school students. Themed, mobile carts go to campus locations where students gather at lunch, dishing up the student-tested-and-approved menu. Students have responded by eating substantially more reimbursable meals than ever before. New in Fall 2010 is a Farm to School Program which connects students and local farms with the objectives of serving healthy meals in school cafeterias while supporting local and regional farmers.

My testimony today will underscore our significant concerns with the cost and other implications of a number of the provisions of the recent reauthorization and the proposed new nutrition standards and meal patterns issued by the Department of Agriculture. These concerns are not unique to San Diego, and are generally shared by other food services directors in California school districts, and by all the major national organizations representing school districts – the Council of Great City Schools, the School Administrators, and the School Boards of the nation.

It is important to understand the context in which my school meals program operates. The School Board and Superintendent Kowba have cut \$300 million from school operations over the past 3 years in response to the greatest financial crisis in California in recent memory. For the upcoming school year, San Diego Unified School District is facing up to \$203 million in additional cuts. The Department of Agriculture's proposed regulation for school meals estimates \$6.8 billion over five years in additional cost resulting from the proposed rules with less than \$1.6 billion in additional school lunch reimbursements -- leaving over a \$5 billion shortfall for

state and local food services officials to attempt to cover. Moreover, some of the new untried and untested federal requirements could decrease participation in the national school meals programs, leaving some children hungry and driving others to less-healthy alternatives.

Currently, our menus are planned by a registered dietitian and then computer-analyzed using nutrient-standard menu-planning which allows great flexibility in selecting food and portion sizes. It also ensures that all meals meet nutrition standards before they are ever served to students. USDA proposes to replace nutrient-standard menu with less-accurate food-based menu-planning for all districts. A computer analysis would only be required every three years during the audit process. In addition, a number of important nutrients will no longer be monitored at all including iron, calcium and Vitamins A and C.

In order to evaluate the new proposals I worked with our dietitian to prepare selected menus based on the new standards. We used our current menus as a starting point and made adjustments as required by the new rules.

Thanks to our existing nutrient-standard menu-based program I was proud to find that our current menus for breakfast and lunch are already in compliance with all the new proposed nutrition standards with the exception of sodium at lunch. All the meals fell within the calorie targets, all the meals met the low-fat standards and all the meals complied with the whole-grain and fruit and vegetable goals.

What was disturbing, however, were the greatly increased food costs our district would have to absorb by going to a less-accurate food-based system. Breakfast food costs increased by 20%, elementary lunch costs increased by 28% and secondary lunch costs increased by 16%. Using nutrient-standard menu-planning we are able to focus in very precisely on each food served on the menu and we can adjust the items and the serving sizes to exactly meet the students' nutritional needs. For example, when we want to make a rice bowl using nutrient-standard menu-planning we are able to juggle the different amounts of meat, vegetables and rice to get the best nutritional profile for the dish at the optimal cost. Under food-based, we do not have this flexibility and the arbitrary standards increase the food cost without improving the overall nutritional quality for the students.

Breakfast programs are especially jeopardized under these proposals. In our district it generally consists of fruit, most of which is a fresh, low-fat milk and a simple entrée such as a breakfast quesadilla or cereal with graham crackers. As noted above, these meals already meet all the new standards for fat, saturated fat, calories and sodium.

Even so, the proposal will double the fruit serving so that the child would receive two servings of fruit, would add a required meat serving daily, and would increase the number of bread servings over the course of a week.

Based on many years of experience serving breakfast to children I and my colleagues in the school food service field are certain that the breakfast will be too large for most students to consume, increasing food waste without improving nutrition for the children. Nothing is achieved when money is spent on food that children won't even be able to consume and nothing is more disheartening to a school food service professional than to see perfectly good and perfectly untouched food thrown into the trash.

It costs more money to buy more fruit, meat and bread. In its proposal USDA estimates the new meal will cost \$.50 more for each meal. This proposal would cost my district over \$4 million dollars yearly, money the Food Services department does not have.

San Diego Unified School District has a strong and long-standing commitment to providing a wide variety of fruits and vegetables to students. All of our elementary schools and the majority of our secondary schools feature salad bars where over twenty different fruits and vegetables are offered weekly. This school year we have added a Farm to School program so that more of our fruits and vegetables come from local and regional sources and help support our small farmers and businesses. In addition, we incorporate vegetables into many of our entrees in popular choices such as Asian bowls with meats and vegetables and chef salads.

Ironically, the proposed regulations eliminate many of the most popular well-accepted vegetables by restricting potatoes, corn and peas to one cup a week total. It is hard to make the case that the bright green peas on our salad bar, our baked potato stuffed with local broccoli and topped with low-fat cheese sauce and our Mexican corn with rice are in any way detrimental to the health of the students.

Another problem is the definition of a serving size. Currently, fruits and vegetables can be combined into one serving which allows the meal to be considered a reimbursable meal. The proposal separates the two and does not allow anything less than a full serving of each to be considered. So a student at one of our salad bars taking 3 orange wedges when a full fruit serving would be 4 orange wedges and a full cup of fresh spring mix when a full serving would be 1 ½ cups would have a substantial amount of healthy, fresh food but still would not have what is required under the proposal. When students are forced to take food they don't want and don't plan to eat to meet an arbitrary standard we send a mixed message to the students. Food waste is also increased. The difficulty and extra cost of administering salad bars under these proposals is quite troubling.

Not only schools with salad bars are impacted by this proposal. Programs of all serving configurations must comply with these more costly serving size requirements. If the students refuse to take fruits and vegetables they don't want, the meal may not qualify as a reimbursable meal. Serving lines must move very quickly when we have to serve hundreds of students per hour and there is no time to discuss the finer points of apple size and number of carrot sticks to try to convince the student he or she should take more food than they had to last year or more food than they want to eat.

We support controlling excess sodium in school meals and are confident that we can meet the proposed Target 1 and Target 2 levels. We have already reduced sodium in our own meals substantially over the years by moving to fewer processed foods and more fresh offerings. However, the final proposed sodium content requirements are lower than those used for cardiac patients in a hospital setting. There is no evidence that lowering sodium intake of healthy children has any impact on their health as adults, only speculation. Clinical studies have shown that when sodium levels are reduced to this level people cannot tolerate the food offered.

Sodium does not just add a salty taste to foods. It has a functional aspect in a number of foods too. For example, baking soda is used in quick breads and muffins to make them rise. The final targets go to such a point that instead of merely pushing schools to use lower-sodium products planning a normal, attractive meal would be almost impossible.

Let's go back to breakfast where the final target is 430 milligrams of sodium. Under the proposal we have to serve a carton of milk, two servings of grains or breads, one serving of meat or meat alternate and two servings of fruits or vegetables. One cup of milk and one cup of unsweetened corn flakes is 367 milligrams of sodium. No one would think this is a terribly salty meal. But at this point I only have the milk and one serving of grain and have already reached 85% of the sodium that it allowed. I can't serve a bigger helping of cereal because I will surely go over. I can't add a slice of toast with 150 milligrams or an ounce of cheese with 170 milligrams. I wouldn't dare add half a cup of low-fat cottage cheese, which is 450 milligrams. You can see that these requirements are not entirely practical.

In order to meet diverse needs of San Diego's children, schools in our district have a variety of grade configurations. In addition to kindergarten students, many of our schools have programs for pre-kindergarten children as young as 4 years old. There are also a significant number of K-8 schools.

Adding a third grade grouping is truly impractical in a school district setting and it is virtually impossible for meals to be planned according to the proposed standards because what is acceptable for the 4th-grade child is not acceptable for 6th grade child and so on. At breakfast, it is very common for siblings of different ages to come at the same time and eat together. Students are not scheduled for lunch according to their ages but according to other needs of the academic day. It is more common than not to find the second-graders followed by the sixth-graders followed by the first graders and so on. Requiring the cashier to determine what constitutes a reimbursable meal for each particular student in a busy cafeteria full of excited children is really asking for what cannot be performed.

Consuming generous amounts of whole-grain products is an important goal for our children. In San Diego all our breads and buns are made with albino whole-wheat flour that gives the students the benefits of whole-grains without the dark color that many students find off-putting. But there are other products that really don't lend themselves to that definition—saltine crackers, for example. Products such as whole-wheat tortillas and whole-wheat pasta are more expensive and not even available in all areas of the country. Product reformulation, recipe testing and changes in labeling all take time and cost money. USDA and the FDA do not even have a common standard for “whole-grain rich” which does not allow us to know which products will meet the new definitions.

Another concern is that changing from the current 5-year Coordinated Review Effort cycle to a 3-year review cycle as well as reviewing two weeks of data instead of one which will result in additional costs for states and for districts. The Nutrition Services Division of the California Department of Education has always been a wonderful resource for me. I have called their knowledgeable staff for assistance and guidance any number of times and they have always been there for me. They have celebrated our successes and they haven't waited until review time to

contact us if they have received a complaint or have heard of something about our programs that concerns them.

But in any district, CRE preparation is considerable. I conducted the first of many training and orientation sessions for our staff last week and our next CRE is not even until next March. I distributed a time-line and task list document that was 6 single-spaced pages long. The costs of gathering materials and well as devoting limited administrative time to these reviews is very significant. I would like to point out that reviews are not the only way districts improve their programs. A strong support program, technical assistance, classes and webinars are other paths. These could be imperiled if state agencies must now spend much more of their time only doing CREs.

Finally, the proposed regulations were issued without a clear statement of how their impact would be evaluated. This is especially troublesome because they are purely theoretical at this point and have never piloted or used in any school setting anywhere. Real issues about the practicality of these regulations have been raised by numerous groups throughout the country. Risks from unintended consequences such as schools eliminating breakfast programs, student meal unacceptability and the true impacts of costs are greatly concerning. These changes should be evaluated in a systematic way. Careful and prudent changes that strengthen our programs and benefit our children can be and should be made based on actual, not theoretical, information.

Again, thank you for the opportunity you have given me today.