



AMERICAN ACADEMY OF
FAMILY PHYSICIANS
STRONG MEDICINE FOR AMERICA

March 28, 2013

Julie Brewer, Chief
Policy and Program Development Branch
Child Nutrition Division
Food and Nutrition Service
3101 Park Center Drive
Alexandria, VA 22302

Re: National School Lunch Program and School Breakfast Program: Nutrition Standards for All Foods Sold in School as Required by the Healthy, Hunger-Free Kids Act of 2010

Dear Ms. Brewer:

On behalf of the American Academy of Family Physicians (AAFP), which represents more than 105,900 family physicians and medical students nationwide, I write in full support of the [proposed changes](#) made to the National School Lunch Program and School Breakfast Program as published in the February 8, 2013 *Federal Register*.

This proposed rule amends the National School Lunch Program and School Breakfast program regulations consistent with amendments made in the *Healthy, Hunger-Free Kids Act* of 2010, which requires that the Secretary of Agriculture to promulgate proposed regulations to establish nutrition standards for foods sold in schools. The *Healthy, Hunger-Free Kids Act* requires that such standards shall be consistent with the most recent Dietary Guidelines for Americans and that the Secretary of Agriculture shall consider authoritative scientific recommendations for nutrition standards.

It is the AAFP's [policy](#) that sound nutrition is a cornerstone of health and should be reflected in all dietary offerings in schools. Items of little or no nutritional value should be replaced with healthy alternatives.

In addition, the AAFP's position on [healthy eating in schools](#) stipulates that:

- Students, parents, educators, family physicians, school nurses, and community leaders should be involved in assessing the schools' eating environment, developing a shared vision and an action plan to achieve it.

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- Adequate funds should be provided by local, state and federal sources to ensure that the total school environment supports the development of healthy eating patterns.
- Behavior-focused nutrition education should be integrated into the curriculum from pre-K through grade 12 and staff who provide nutrition education will have appropriate training.
- School meals should meet the USDA nutrition standards as well as provide sufficient choices, including new foods and food prepared in new ways, to meet the taste and cultural preferences of diverse student populations.
- All students should have designated lunch periods of sufficient length to enjoy healthy foods with friends and these lunch periods will be scheduled as near the middle of the school day as possible.
- Schools should provide enough serving areas to ensure student access to school meals with a minimum of wait time
- Space that is adequate to accommodate all students and pleasant surroundings that reflect the value of the social aspects of eating should be provided.
- Students, teachers and community volunteers who practice healthy eating should be encouraged to serve as role models in the dining areas.
- If foods are sold in addition to National School Lunch Program meals, they should be from the five major food groups to foster healthy eating patterns.
- Decisions regarding the sale of foods in addition to the National School Lunch Program meals should be based on nutrition goals, not on profit-making.

The AAFP reviewed the proposed changes and concur that they are intended to improve the health and well-being of the nation's children, increase consumption of healthful foods during the school day and create an environment that reinforces the development of healthy eating habits.

We appreciate the opportunity to provide these comments and make ourselves available for any questions you might have or clarifications you might need. Please contact Robert Bennett, Federal Regulatory Manager, at 202-232-9033 or rbennett@aafp.org.

Sincerely,

A handwritten signature in black ink that reads "Glen Stream MD". The signature is written in a cursive, flowing style.

Glen Stream, MD, MBI, FAAFP
Board Chair