



AMERICAN ACADEMY OF
FAMILY PHYSICIANS
STRONG MEDICINE FOR AMERICA

March 22, 2012

Vivian Lees, Branch Chief
State Systems Support Branch, Child Nutrition Division
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive, Room 639
Alexandria, Virginia 22302-1594

Re: RIN 0584-AE10

Dear Branch Chief Lees:

On behalf of the American Academy of Family Physicians (AAFP), which represents 100,300 family physicians and medical students nationwide, I write in response to the U.S. Department of Agriculture's [proposed](#) National School Lunch Program: Direct Certification Continuous Improvement Plans Required by the Healthy, Hunger-Free Kids Act of 2010 as published in the January 31, 2012 *Federal Register*.

The AAFP believes there is a significant need to improve school nutrition programs accessed through state education agencies, and we therefore support policies in this proposal that if finalized, would result in a more nutritious lunch for children. We believe that sound nutrition is a cornerstone of health and should be reflected in all dietary offerings in schools, (e.g., food service, meals, vending machines). As the final rule is developed, the AAFP urges the USDA to offer strong incentives for school nutrition providers to replace items that have little or no nutritional value with healthy and ideally locally produced alternatives. The replacement of healthy and locally sourced items in school lunches teaches nutritional values and promotes health, and reduces the cost and carbon footprint of the school lunch program.

As the agency further develops policy on the National School Lunch Program, the AAFP encourages the USDA to consider our policy on Healthy Eating in Schools. It states that:

1. 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.
2. 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.
3. Behavior-focused nutrition education should be integrated into the curriculum from pre-K through 12th grade and staff who provide nutrition education will have appropriate training.
4. 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.
5. 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.

www.aafp.org

President
Glen Stream, MD
Spokane, WA

President-elect
Jeffrey J. Cain, MD
Denver, CO

Board Chair
Roland A. Goertz, MD
Waco, TX

Directors
Reid Blackwelder, MD, Kingsport, TN
Conrad L. Flick, MD, Raleigh, NC
Laura Knobel, MD, Walpole, MA
Barbara Doty, MD, Wasilla, AK
Richard Madden, Jr., MD, Belen, NM
Robert Wergin, MD, Millford, NE

Julie K. Wood, MD, Lee's Summit, MO
Wanda D. Filer, MD, York, PA
Daniel R. Spogen, MD, Reno, NV
Robyn Liu, MD, (New Physician Member), Portland, OR
Brent Smith, MD, (Resident Member), Brandon, MS
Jessica Johnson (Student Member), Newington, CT

Speaker
John S. Meigs, Jr., MD
Brent, AL

Vice Speaker
Javette C. Orgain, MD
Chicago, IL

Executive Vice President
Douglas E. Henley, MD
Leawood, KS

6. Schools should provide enough serving areas to ensure student access to school meals with a minimum of wait time
7. Space that is adequate to accommodate all students and pleasant surroundings that reflect the value of the social aspects of eating should be provided.
8. Students, teachers and community volunteers who practice healthy eating should be encouraged to serve as role models in the dining areas.
9. 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.
10. 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 is committed to improving the National School Lunch Program as part of our Americans In Motion-Healthy Interventions ([AIM-HI](#)) initiative, which positions physical activity, healthy eating, and emotional well-being as the treatment of choice for prevention and management of obesity and many chronic conditions. Through partnerships with MetLife Foundation, AIM-HI has awarded grants of \$10,000-\$30,000 to family medicine residency programs to develop family-centered, community projects designed to reduce childhood obesity and promote fitness. In addition, the AAFP was pleased to pledge our support for the First Lady Michelle Obama's *Let's Move* initiative, as we encourage our members to combat the problems associated with childhood obesity.

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,



Roland A. Goertz, MD, MBA, FFAFP
Board Chair