

## **Combined Comments of the Reviewers of the SNDA-IV Final Report**

### **Chapters 1-4**

**Constance Newman**

**Economist, Economic Research Service**

**United States Department of Agriculture**

**Overall Comments:** This is excellently written and interesting. My only general comment is that the summaries at the beginning of each chapter are so comprehensive that, for many of the brief topics, the corresponding parts of the chapters seem redundant. But I think the summaries will be useful for people that want to peruse the highlights. And I wonder if the Afterschool Snack Program should be mentioned in the beginning when NSLP and SBP are said to be “known collectively as the school meal programs”.

**Jamie Chriqui**

**Senior Research Scientist in the Health Policy Center, Institute of Health Research and Policy**

**Research Associate Professor in Political Science, University of Illinois at Chicago**

**Overall Comments:** This is an outstanding and incredibly thorough report that will be widely cited and referenced by policy makers, education officials, the public health community, researchers, the media, and many more! The study team is to be commended for their excellent work. My comments are mainly clarification or requests for expansion. NCES CCD also includes data on race/ethnicity of district students and school students. Given the racial/ethnic disparities in child obesity and eating/physical activity behaviors, it would be really useful to also compare responses by race/ethnicity of the district/schools. You could create majority race/ethnicity variables to reflect the predominant race/ethnicity (e.g., majority non-Hispanic white, majority non-Hispanic, Black, majority Hispanic, diverse districts). Given the advocacy community’s great interest in seeing that the USDA’s proposed competitive food rule (when it is issued) address fundraisers, I think it would be really helpful from a policy and advocacy perspective to tease out data specifically about what foods/beverages are sold through in-school fundraisers throughout Section D of Chapter 3 rather than simply collapsing fundraiser data as part of “any other alternative food source.”

**Mary Frances Nettles**

**Director, Applied Research Division**

**National Food Service Management Institute**

**Overall Comments:** Chapters 1-4 are well written and generally understandable for practitioners. On tables, I prefer to see “n” for each response category as well as the percentage – but that is my preference. No major concerns – I enjoyed reviewing these chapters.

### **Chapters 5-8**

**Katie Wilson**

**Director, Administrative Division**

**National Food Service Management Institute**

**Overall Comments:** Number of schools – first, this seems like a small number of schools when there are over 90,000 nationwide. Did this mean school districts or individual schools? An important variable maybe what region of the country the schools were located in. Was any of the data reported by region?

“Average” school lunch and breakfast. Is this defined somewhere? I am not sure that there is such a thing when you look at school meal programs nationwide and the incredible diversity in each program. This seems that it will give a false sense of what was really reported on. Self reporting is not the best method in which to gather accurate data. How did you account for the variable of who might have filled out the survey and what their expertise level was? Were they new directors, educated in determining the data requested, or able to access accurate data requested?

Averaging components – was there any attention to outliers? If you had 12 2% milks – would that change the outcome of the data? If you did not enter all recipes, how did you determine the other nutrients? Using a national food data base instead of actual nutrient analysis of recipes is not accurate data due to the fact that school nutrition directors many times write their own specifications that can be considerably different than a national data base. With sodium in the spot light – it is weakens the outcome credibility when “sodium level could be overestimated”.

This will cause a media frenzy. It just seems that so much of the data reported was averages and in programs that are so diverse, it doesn't give an actual picture of what is going on.

Were the 2010 DGA's out when the 2009-2010 menus were being developed and written? If not, then those menus were not expected to reflect the 2010 DGA's. In this case, comparing them to the 2010 DGA's is misleading and can cause undue negative reports. It is confusing to the reader when the text jumps back and forth between the requirements for 2009-2010 and the 2010 DGA's. Some of the data collected was from a full week of school, some for 4 days and some for only 3 days. I again think that this will not reflect an accurate picture of the program. I really believe that the SNDA studies of the past and SNDA IV are not actual pictures of what is going on in a very diverse program with quality based on a variety of missing variables including education of director and regional location. The limitations of this study are many and the report will be confusing and detrimental to the advancements made in the programs in the last few years.

**Marlene Schwartz**

**Deputy Director, Rudd Center for Food Policy & Obesity**

**Yale University**

**Overall Comments:** Overall, this is an extremely impressive and comprehensive study of school food and nutrition. There is a tremendous amount of information; the challenge is presenting it in a way that is easily interpretable to the reader. In general, I thought the authors were very successful. There are a few analyses that would be really nice to see. One pertains to flavored milk. It would be interesting to see how the need for calcium should be balanced against the need to limit saturated fat and added sugar. My sense from looking at these data is that children are definitely being given enough calcium. I cannot tell whether this is nearly all attributable to the milk, or if it is also the cheese and other dairy products in the foods. At the same time, the children are also getting much too many grams of added sugar in school meals. Any information on how this balance plays out with these data would be very useful to the debate on whether flavored milk is an overall nutritional win or not.

Another analysis that wasn't in the chapters I reviewed, but seemed to be elsewhere in the report is the relationship between competitive foods and participation in school meals. It seems there

are some data that as competitive food sales go up, lunch participation goes down. I believe the data from this study is an opportunity to see how limits to competitive foods across districts (through state policies or local wellness policies) might actually help increase participation in the school meal programs. It would be great to see how participation rates over time change, with availability of competitive foods as a predictor. As you know, one concern among food service directors about selling fewer competitive foods is that it will cause revenue loss that is not made up by an increase in lunch sales. These data would be useful in predicting the financial impact of making changes in competitive foods.

Although information was collected on the presence of competitive foods, it does not seem that the nutrient profile of these foods was collected. The findings that there has been an increase in restrictions or bans on the types of foods/beverages that can be sold is interesting, and it would be helpful to see how this translates into changes in the actual nutrient composition of the competitive foods that are still sold. Similarly, the American Beverage Association claims that they have made substantial changes in what they ship to schools and they report data that match the dates of this study, so it would be interesting to see how their ratios of different beverages available in different school levels match with the findings from the reports in this study.

**Ellen Harris**

**Beltsville Human Nutrition Center, Agricultural Research Service**

**United States Department of Agriculture**

**Overall Comments:** Overall, Chapters 5 - 8 in the report are very well written. To include analyses based on the 2010 Dietary Guidelines in comparison to the SMI nutrition standards was an excellent decision. Colleagues, who are teachers, often complain to me about the "sugary" breakfasts. They don't know the difference between offered vs. served. They're going by what they observe. Given this type of criticism I would have liked to have seen analysis of added sugars in this chapter (and Ch. 5), especially given the MyPlate food grouping findings for SoFAS in lunches and breakfasts.

I understand emphasis was reporting on protein, vitamins A & C, cholesterol, sodium and dietary fiber and in this chapter their food sources. However, I believe there is a missed opportunity to

address future nutrition standards by not including analysis of added sugars. The top 10 food groups for added sugars includes grain based desserts, dairy desserts, ready-to-eat cereals, sugar/honey, yeast breads, and syrups/toppings. Leading sources of calories in lunches included pizza products and various sandwiches (yeast breads) and in breakfast it was breads and grains (ready-to-eat cereal, yeast breads). Ch. 8's Appendix H includes more detailed results for a larger set of nutrients. Again, given the MyPlate food grouping findings, why not include food sources of added sugars in this appendix?

### **Chapters 9-12**

**Joanne Guthrie**

**Assistant Deputy Director for Nutrition, Food Assistance and Nutrition Research Program  
Economic Research Service, United States Department of Agriculture**

**Overall Comments:** Overall, Chapter 9 is a wonderful addition to SNDA analysis to now include MyPlate servings in the basic report. Reads well and I particularly like the tables showing amounts offered side-by-side with amounts served. Summarizes the information and identifies student behavior change priority areas very well. A major concern: for me, the most startling finding was the very high level of SOFAS in breakfasts, especially elementary-level breakfasts. Doesn't seem very consistent with the findings (from other chapters) on saturated fat, so some explanation is needed. Please provide some information on whether it is added sugars or solid fats that is driving those findings (might want to give some example foods that drive the findings, like pancakes or muffins). Also, Table 9.3 indicates that the higher SOFAAS amount compared to recommendations that is found at the elementary level is explained by the fact that those younger students have a lower recommendation. But that is not really mentioned in the text. Since this is such a noteworthy finding, it's worth explaining it in both the Summary bullet and in the text.

Great to have a trend analysis included in the report. Pulls together the basic question most people have "Is school nutrition improving? How much?" But I had a real problem with reading chapter 11—the time period over which trends were studied seemed to shift. Reading the overview, I expected to see the trend line be SNDAs II, III, IV. But that seemed to shift—often if was only SNDAs III & IV that were compared. There was one bullet (final bullet) in the

summary that compared SNDAs I and II. These shifts made the chapter hard to read and gave the impression the authors were “cherry picking” comparisons. Chapter would be clearer if revised to include such changes as:

- Chapter title should clarify the time period “over time” refers to, as for example “changes in school meals: 1998-99 to 2009-2010”
- Comparisons should be consistent with time period of title—if another time period used as basis for comparison, explain why—e.g. examines a factor for which data not collected in earlier time period.
- Explain decision not to include SNDA I as pre-school meal reform baseline.

Although Appendix L provides a detailed description of HUSSC criteria, I think chapter 12 would benefit from a Box or Figure summarizing major HUSSC criteria, similar to the MYPLATE graphic in Chapter 9. Most readers won’t know the criteria and an “at-a-glance” guide to them would make the chapter more accessible. Along those lines, it would be good to revise the writing to clarify the difference between findings directly driven by HUSSC criteria—such as serving lowfat/nonfat milk and offering more varied vegetables—and ones that are not required, but seem to be correlated with being an HUSSC school—such as offering raw vegetables more frequently. Is there any explanation you can give for so many HUSSC schools being in the Southeast? Is it driven by a particular State’s activity? Or the FNS regional office? It is such a striking difference that the reader is bound to wonder what the explanation is (I certainly did!).

**Claire H. Miller**

**Technical Reviewer**

**Overall Comments:** The discussion about counting cheese as contributing to the dairy group needs to have the explanation up front (it is discussed p.9.8). In the NSLP, cheese is counted as a meat/meat alternate, and cannot be counted for the milk group. By law, fluid milk must be offered with school meals. Because it was not explained up front, I was initially confused by apparent shortage of offering of protein foods and over amount of dairy offered.

Confusing as to how legumes were classified. Text states that legumes were categorized based on how the food was used in the menu. Yet it is stated that legumes offered as a vegetable **or included in a combination food** were counted as a vegetable and legumes offered as a meat/meat alternate were counted in the protein group. Importantly, how did the menu planner categorize legumes offered in a combination food? Were they planned as a meat/meat alternate? There are many CN labeled combination products containing legumes that are credited as a meat/meat alternate. For example a Beef & Bean Burrito can have a CN label where both beef and beans are credited as a meat/meat alternate. If combination foods that contain legumes were planned as a meat/meat alternate but counted in this study as a vegetable, that could also have resulted in the finding that NSLP meals provided less than one-third of the daily recommendation for protein foods.

Nutrition Standards for Foods Offered on School Campuses. I found this discussion confusing at first since foods offered at school includes foods provided through school meals and foods sold through a la carte, vending machines, etc. This section provides a restricted discussion of school meals. Needs to have acknowledgement at start of discussion that foods offered on school campuses includes school meals and other foods sold on campus, including a la carte, vended, school stores, and snack bars.

There needs to be a discussion that the HUSSC criteria for competitive foods include differences in time and place. For Bronze and Silver Awards, the competitive foods criteria apply to foods sold in the school cafeteria, during meal times. For the Gold and Gold Award of Distinction, the competitive foods criteria apply to anytime during the school day and anywhere on school campus. Please note that the HUSSC competitive foods criteria do not include criteria for school birthday celebrations in the classroom.

**Goulda Downer**

**Project Director, National Minority AIDS Education Training Center**

**Howard University**

**Overall Comments:** All four chapters address important issues and the sample size comprises quantitative data that is sufficient to perform the required statistical comparisons presented.

Furthermore, in general, evaluation components are designed and targeted to measure the specific research questions provided about the SNDA-IV. Overall, the chapters are solid from an evaluation standpoint. The writers explain their methodology in exhaustive detail and where there are limitations in the data or where the methodology departs slightly from standard approaches, e.g. the analyses of changes in school meals over time, they provide convincing rationales as to why this was the case. The statistical tests, the levels of significance, indeed all aspects of the analysis show a considered and thoughtful approach to the problems at hand. Because the chapters are so dense the summary of findings that is included at the start of each chapter was particularly helpful.

**FNS received editorial comments from the following reviewers:**

- Patricia Guenther  
Nutritionist, Center for Nutrition Policy and Promotion  
United States Department of Agriculture
- Caitlin Merlo  
Health Scientist, Centers for Disease Control and Prevention
- Colette Rihane  
Director, Center for Nutrition Policy and Promotion  
United States Department of Agriculture