

Mark L. Bishop
Healthy Schools Campaign
205 W. Monroe, Fourth Floor
Chicago, IL 60647

December 12, 2005

Re: Comments on minimally nutritious items rules changes

Illinois State Board of Education Members:

In July 2005, the Governor signed into law Public Act 94-0199, which established a state goal that all school districts develop health-promoting wellness policies based on Centers for Disease Control and Prevention (CDC) best practices. As you consider a rule change that would establish nutrition standards for 'minimally nutritious items', it is important for you to view these efforts in the context of this state goal. I wanted to take this opportunity to review and compare the CDC best practices to the proposed rules.

Obesity, a Growing Problem

Over the last two decades, rates of obesity have doubled in children and tripled in adolescents. Sadly, many children ages 5-10 are beginning to show early warning signs for heart disease, such as elevated blood cholesterol or high blood pressure. In addition, Type 2 diabetes, once unrecognized in children and adolescents, has increased among this group and can be attributed to excessive weight gain in children.

While the reasons for obesity are multi-faceted and complex, it is clear that the school food environment is one of many factors contributing to this problem. Currently, low-nutrition foods are widely available outside of the school meal programs in vending machines, snack lines and school stores. The Illinois Nutrition Education & Training Program recently surveyed food service directors and principals across the state and found that 84 percent of Illinois junior and high schools have vending machines. The most common items sold in these machines are high in calories, saturated fat, trans fat, cholesterol, refined sugars or sodium, which contribute to health problems such as obesity, heart disease, cancer, stroke, diabetes and tooth decay.

In addition, a growing body of research shows that school-based interventions which include changes in the food environment, promotional activities, nutrition curricula and parental involvement, have resulted in healthful food choices among students. This is important to preventing weight gain and ultimately preventing overweight and obesity in youth.

Best Practices

In 1996 the Centers for Disease Control and Prevention published [Guidelines for School Health Programs to Promote Lifelong Healthy Eating](#). These guidelines established a base for evaluating an effective school nutrition environment which included standards for all foods in school. It states:

Healthy and appealing foods should be available in meals, a la carte items in the cafeteria, snack bars, and vending machines; as classroom snacks; and at special events, athletic competitions,

staff meetings, and parents' association meetings. In addition, schools should discourage the sale of foods high in fat, sodium, and added sugars (e.g., candy, fried chips, and soda) on school grounds and as part of fundraising activities. Although selling low-nutritive foods may provide revenue for school programs, such sales tell students that it is acceptable to compromise health for financial reasons. The school thereby risks contradicting the messages on healthy eating given in class. If schools contract with food service management companies to supply meals, the contractors should be required to serve appealing, low-fat, low-sodium meals that comply with the standards of the Dietary Guidelines for Americans.

Proposed Rule Change

Our review of the proposed rule shows four main discrepancies between the CDC recommendations and the state goal. To bring this rule into accordance with the goal, HSC suggests making the following considerations:

- **Include K - 12 schools.** A recent study showed that 98% of high schools have vending machines, compared to 43% of elementary schools. Additionally, elementary schools are already required to prohibit the sale of junk food to students during meal hours. By excluding high schools from the proposed rule, the board would be ignoring the area that needs the most improvement.
- **Include all school fundraisers.** While the proposed rule would limit the fundraisers allowed in schools (e.g., candy carts during lunch periods), it would do nothing to address candy/junk food that is being sold off school grounds. In elementary schools, the majority of items sold through fundraisers are not sold to students, but are taken home and sold to parents and families. Allowing these types of sales to continue promotes messages that are inconsistent with healthy nutrition goals.
- **Include foods in the classroom.** Though it is well known that the classroom is an important context for modeling healthy behavior, the current recommendation excludes foods that are used by teachers to reward or punish students. A comprehensive nutrition policy should incorporate healthy food messages within the classroom and reduce practices that could contradict what is taught in nutrition education courses.
- **Include staff and parents.** An effective nutrition policy needs to not only address student food choices, but also ensure that these food choices are supported and modeled by staff and parents. Current language would only address foods "sold to students" and would exclude foods sold in teacher lounges and foods offered at school sponsored meetings.

HSC recognizes the need to respect the important role that local decision makers play in schools. By establishing a new definition of 'minimally nutritious items', we are not proposing a new regulation that reduces local control. Rather, this process would update the existing rule to take into account new science and established best practices. In fact, by changing to a definition based on nutritional content rather than broad categories (e.g., all confections, candy, potato chips, carbonated beverages), the rule would add flexibility by allowing the sale of products formulated to be lower in fat and sugar.

Background

HSC, the primary advocate for school environmental health issues in Illinois, educates and organizes parents, students, school personnel and community members on issues related to school environmental and nutritional health. In response to the alarming rates of childhood obesity, we work with schools to improve the nutritional quality of school foods, and are very concerned about the lack of nutritional standards for foods sold outside the federally funded school food program.

HSC appreciates the opportunity to help develop state policies that promote life-long healthy eating behaviors and we look forward to working with the Board to finalize and adopt this rule.

Thank you for leadership on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Bishop". The signature is written in a cursive style with a prominent horizontal stroke at the end.

Mark Bishop
Deputy Director
Healthy Schools Campaign