

ARIZONA NUTRITION STANDARDS: REQUESTS FOR CONSIDERATION

<b>Category I: Specific nutrient standards for items listed in the AZNS that are not included that should be included</b>			
<b>Request for Action</b>	<b>Justification</b>	<b>ADE Response</b>	<b>Panel Recommendation</b>
1. Dairy products should be included in sugar standard.	None given	Dairy naturally contains lactose, a naturally occurring sugar and thus the inclusion would eliminate all milk from being served. The overall caloric and carbohydrate levels provided by milk are controlled by the portion size standard.	<b>No</b>
2. Sugar standard should be lowered from 35% total weight to allow no more than 25%.	Reflects Center for Science in the Public Interest (CPSI) recommendation.	The AZ standards were derived from the recommendations of several organizations, including CPSI who recommends that no more than 35% of weight comes from sugar. In addition, this standard has been implemented in several schools throughout the United States. USDA has addressed sugar limitation in the Guidelines for Americans since sugar contributes to unnecessary added calories.	<b>No</b>
3. Standards for Glycemic index (under 55) or glycemic load (under 10) should be used instead of total sugar by weight.	Better indicators than "total sugar by weight" for how quickly food raises one's blood sugar.	The law states that the Arizona Standards must be based on federal guidelines. There are no federal guidelines supporting the use of glycemic index.	<b>No</b>
4. Standard should be written for Sodium. (x16) Range of suggested standards from 150 to 600 mg. per serving. (See III-9,10,11)	Is a known contributing factor to heart disease. CSPI recommends no more than 150 mg per snack item serving. Standard would eliminate many processed foods. National initiative is to lower sodium intake. Should stay consistent with USDA guidelines and set model for good choices.	The ADE would support a sodium standard of 800 mg maximum for program meal items sold as a la carte and 600 mg maximum for all other snack items sold as a la carte.	<b>Yes - standard should follow the USDA guidelines</b>

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<p>5. Standard should be written for cholesterol content.</p>	<p>Contributes to heart disease.</p>	<p>The proposed nutrition standards include a fat standard and lower fat foods are typically associated with lower cholesterol levels.</p>	<p><b>No</b></p>
<p>6. Standard should be written for Nutrient-Dense Beverages. (included in AZNS Appendix B, Allowable foods)</p>	<p>Provide significant amounts of nutrients (e.g., calcium, fiber, potassium, Vitamins D, E &amp; A) and relatively few calories (sugar). USDA has developed general criteria.</p>	<p>The ADE would support a recommendation that 10% of schools beverage choices are required to be nutrient dense.</p>	<p><b>No</b></p>
<p>7. Standards should be written for vitamin, mineral, and protein content. (x3)</p>	<p>Children are not getting the "quality" they need to be healthy on a long-term basis. Specifically need to be written in regard to rice, nut and soy milk products.</p>	<p>The School Meals Initiative (SMI) regulates program meals and ensures they meet vitamin and mineral requirements, including calcium, protein, vitamin A, vitamin C, and Iron. Including a standard for these nutrients for snack foods may limit the number of allowable foods schools can serve.</p>	<p><b>No</b></p>
<p>8. Standards should apply to all foods and beverages sold in school lunch programs (NSLP) not to just a la carte items.</p>	<p>There are still many foods that are high in fat, low in nutrition and too large portions for kids in the reimbursable lunch meals.</p>	<p>The NSLP is monitored through the SMI process. This ensures all meals served under the NSLP meet specific federal and state nutrition standards. SMI does not apply to a la carte or vending machine sales. These proposed standards can additionally improve school meals by improving what competes with them. A la carte items are often NSLP entrees. If a la carte options improve through these standards, in turn NSLP program meals will also improve.</p>	<p><b>No</b></p>

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<b>Category II: Specific nutrient standards for items listed in the AZNS that are too strict</b>			
<b>Request for Action</b>	<b>Justification</b>	<b>ADE Response</b>	<b>Panel Recommendation</b>
1. Standard for 1% or lower milk fat content should be raised. (x 11) (see IV-1&2) Whole and 2% suggested.	Students will not drink skim milk nor put it on their cereal. Sight is very important to children in choosing what they eat. Low intakes of milk during childhood may contribute to acquiring more body fat. Will give children variety. Children who ate more dairy foods had gained less fat than those who ate fewer dairy foods,	WIC has recently changed their allowable milk to include only 1% and skim milk. Many students drink 1% milk daily at schools. Whole milk and 2% milk have significantly higher fat and saturated fat than 1% or skim milk. Studies have shown high fat and high saturated fat diets are linked to heart disease and obesity. In addition, the American Academy of Pediatrics does not recommend whole milk after 2 years of age. The ADE is willing to consider allowing 2%, but will continue to promote, recommend, and campaign consistently with other federal and state agencies for 1% milk or less.	<b>Yes - standard should be 2% or lower</b>
2. Raise the limit on total sugar allowed in milk. (x2) (see IV-3) Suggestions range from 30 grams per 8 oz. to 4 grams of sugar per ounce of fluid milk.	Child Nutrition Reauthorization Act encourages flavored milk as an avenue for children to get calcium and other nutrients. U. of Vermont study shows that children who consumed more than 6-8 oz. of flavored milk had better nutrition than those who drank sodas and sweetened fruit drinks.	There is a variety of flavored milk that will meet the current proposed nutrition standards for sugar. For example, the standards allow Lucerne 1% chocolate milk. Additionally, reauthorization refers to NSLP meals and not recommended a la carte items.	<b>Yes - standard should allow 4 grams of sugar per oz.</b>

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<p>3. 30% or less fat should be increased. (x17). 35-40% suggested.</p>	<p>30% standard is intended for the average fat consumed in a day or over a period of days (CSPI Standard and middle value of 2005 Dietary Guidelines). 30% would require elimination of USDA commodity products from al la carte sales, e.g. french fried potatoes (35.3%) and potato rounds (51.2%). CA standard (35%) was amended to apply to snacks only. CA Entrees can have no more than 4 gm of fat per 100 calories (36%). If AZNS mirror CA standards will be in a better position to produce acceptable snacks at more affordable costs. Need to serve the needs of all kids. Would allow more items to be included in a la carte sales.</p>	<p>The law states that the standards cannot be less strict than the federal guidelines which include the dietary guidelines. The dietary guidelines for children recommend 25-35% of total calories from fat. The law does not allow the fat standard to exceed 35%.</p>	<p><b>Yes - standard should be 35% or less fat. ADE should consider a plan to phase in 30% standard with consideration given to the quality of fat.</b></p>
<p>4. Fat standard of 30% should be computed for an entire meal on a weekly average not per item.</p>	<p>Proposed standard will deprive kids of getting enough calories and send them to their classrooms hungry. They throw away what doesn't appeal to them. You cannot force a child to eat what you dictate.</p>	<p>Program meals on the National School Lunch and School Breakfast Program cannot exceed 30% of total calories from fat averaged over one week. Enforcing schools to average snack items over one week will increase schools workload immensely. Evaluating snack items on a per item basis is the most efficient and evidence based approach.</p>	<p><b>No</b></p>
<p>5. Eliminate "reduced fat" requirement for cheese. (x3)</p>	<p>Not achievable based on current market particularly if applied to a la carte entrees. Should be a recommendation not a requirement. Reduced fat cheese does not melt.</p>	<p>The Dietary Guidelines recommend low fat or fat free dairy.</p>	<p><b>No</b></p>

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<p>6. Eliminate fat standard.</p>	<p>It is okay for children to have higher fat foods and regular desserts when offered in a well-balanced meal.</p>	<p>The law states that the standards cannot be less strict than the federal guidelines which include the Dietary Guidelines. The Dietary Guidelines for children recommend 25-35% of total calories from fat. The law does not allow the fat standard to exceed 35%. Additionally, studies show diets high in fat and saturated fat increase the risk for heart disease and obesity.</p>	<p><b>No</b></p>
<p>7. "Or no more than 2 grams of saturated plus trans fat" should be added to the 10% or less of total calories from saturated and trans fatty acids.</p>	<p>Addresses obesity in youth while ensuring a more reasonable approach.</p>	<p>The Federal Guidelines recommend 10% or less of total calories from saturated fat and trans fatty acids.</p>	<p><b>No</b></p>
<p>8. 35% total sugar weight should be increased. (x5) 45 -50% suggested.</p>	<p>Focus should be on caloric consumption not on specific % of total weight. Some allowable foods have more calories than unallowable foods. (see next request). The 300-calorie per serving requirement would indirectly regulate sugar intake. Would give kids more selection.</p>	<p>The AZ standards were derived from the recommendations of several organizations, including CPSI who recommends that no more than 35% of weight comes from sugar. In addition, this standard has been implemented in several schools throughout the United States. USDA has addressed a sugar limitation in the Guidelines for Americans, since sugar contributes to unnecessary added calories.</p>	<p><b>No</b></p>

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<p>9. Eliminate sugar standard. (x3)</p>	<p>Chocolate Brownie Cliff Bar (allowed) contains 100 more calories and 6 more grams of sugar than Nutri-Grain Bar (not allowed). Snack items would still have to follow 300-calorie rule but there would be more items at lower calorie levels.</p>	<p>See response above.</p>	<p><b>No</b></p>
<p>10. Maximum allowable (300) calories for a la carte entrees that are part of the NSLP should be increased. (x11) 350-400 calories suggested. (see IV-8)</p>	<p>Very difficult to offer anything at 300 calories or less. A la carte entrees should be allowed to be 75% of RDA for calories for the meal. Lower fat foods are often more expensive than higher fat versions of the same foods. Will result in decreased sales for school cafeterias that are struggling to survive. May force schools to switch from Nutrient Based Menu Planning to Traditional Menu Planning (less calories but no nutrient analysis). Will still restrict fat content in al la carte food items but will allow a wider variety of products. Texas limits # of times per week fried potatoes can be served. CA allows 400 calories per serving.</p>	<p>The ADE would support an increase in the calorie standards for “entrée” items to a maximum of 400 calories per serving. An entrée item can be defined as the main course.</p> <p>Snack items should continue to remain at 300 calories per serving to assist with calorie control.</p> <p>Note: Several studies indicate that children that eat NSLP meals have better diets (decreased fat, decreased calorie, and increased vitamin intake) than children that eat from a la carte lines. Increasing the a la carte calorie standard to allow NSLP entrees to be sold individually does not support practices of healthy eating and good nutrition. Furthermore, a la carte items are not reimbursed by USDA, only program meals, therefore this may decrease the amount federal reimbursement a school receives. Also, students who only select one entrée item from the a la carte line will be receiving an incomplete meal, for example a slice of pizza without a serving of fruit, vegetable, or milk.</p>	<p><b>Yes - increase standard to maximum of 400 calories for entrees and 300 calories for snacks and side dishes.</b></p>

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<p>11. Fiber requirement should be eliminated. (x4)</p>	<p>Children will not purchase the current allowed items. Current standard would prohibit healthy foods, e.g. iceberg lettuce, celery, peppers and nectarines.</p>	<p>Fiber is primarily found in the following food groups: Grains, fruits, and vegetables. Therefore, fruits and vegetables will not be excluded due to the fiber standard. For example, nectarines have 2 grams of fiber per serving.</p>	<p><b>No</b></p>
<p>12. Replace fiber standard with a requirement based on whole grain. (x2)</p>	<p>"MyPyramid for Kids" emphasizes importance of whole grain foods. The benefits of whole grains go beyond fiber e.g., vitamins, minerals and phytonutrients. Fiber is not a good indicator of whole grain.</p>	<p>MyPyramid does encourage the consumption of whole grains. Whole grains include fiber but also the germ of the grain and the endosperm. Currently, it is difficult to determine if a product is whole grain and thus may be difficult for schools to find whole grain products. In addition, whole grain products are not currently subject to labeling requirements. To only allow whole grain products would seriously diminish the selection of snack foods schools could offer.</p>	<p><b>No - however, schools should be encouraged to use whole grains</b></p>
<p>13. Fruit juices with less than 100% juice should be allowed. (x6) 10-50% standards suggested.</p>	<p>Proposed standard will eliminate many beverages that are fortified with vitamins and minerals. Calif. healthy school bill allows 50% juice without additional sugar. Hi-C and similar drinks have more vitamins than juice.</p>	<p>Many juices that are not 100% fruit juice contain added sugars. The USDA has addressed sugar limitation in the Dietary Guidelines for Americans since sugar contributes to unnecessary added calories. Also, 100% fruit juices are also fortified with vitamins and minerals.</p>	<p><b>Standard should be maintained for elementary schools. For middle and junior high schools standard should be changed to "no less than 50% juice, no added sugar, with nutrient values equal to 100% juice."</b></p>

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<b>Category III: Beverage and food items that are not listed in the AZNS as restricted but should be restricted</b>			
<b>Request for Action</b>	<b>Justification</b>	<b>ADE Response</b>	<b>Panel Recommendation</b>
1. Juice (x4) should be restricted.	Juice is loaded with sugar, i.e. lots of empty calories. No fiber. Too much fruit juice can add to diarrhea. Diets high in refined sugars can promote obesity.	Juice consumed in large quantities may be related to diarrhea however, ADE has addressed portion control that correlates with other national organization recommendations. Juice also contains micronutrients such as vitamin C and vitamin A that are essential in a growing child's diet.	<b>No</b>
2. Pop Tarts should be restricted. (x5)	High in sugar and trans fats. Send kids message that brown sugary frosting is healthy	The ADE is in support of restricting pop tarts.	<b>No - if meet standards</b>
3. Flavored milk should be restricted.	Has high glycemic index/glycemic load and is known to play role in obesity.	Some flavored milk is restricted due to the amount of sugar it contains. However, flavored milk has been shown to contribute to the increased consumption of calcium among children and ultimately improves their overall health and well being.	<b>No - if meet standards</b>
4. Shamrock 1% flavored milk should be restricted.	Contains sucralose, an artificial sweetener.	Foods and beverages that contain artificial sweeteners will be restricted.	<b>No - if meet standards</b>
5. Dannon Frusion Smoothies, Yoplait Nouriche Smoothies, Yoplait Yogurts, Dannon Sprinklins should be restricted.	Contain too many calories per serving, large quantities of added sugar, no fiber. There are better alternatives with fiber, less sugar and reduced calories per serving.	These foods contain many nutrients including calcium, vitamin D, B vitamins, and protein. Although they have added sugars, they are a healthy alternative to many snack foods.	<b>No - if meet standards</b>

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<p>6. Food (e.g., sports and energy bars, Quaker Oatmeal Squares) made with high fructose corn syrup should be restricted. (3x)</p>	<p>Known to play a role in obesity. Man-made, not occurring in nature. Used in junk food because they are inexpensive and shelf stable. Difficult for the body to process.</p>	<p>There is not enough conclusive evidence that high fructose corn syrup is linked to obesity. However, over consumption of calories has been linked to obesity.</p>	<p><b>No - if meet standards</b></p>
<p>7. Cereal/Energy bars should be restricted. (x5)</p>	<p>Sugar content is the same as candy bars but there may be 1-2gm fibers. Clif bars are formulated for adults and are not acceptable for children. Quaker Butterfinger Granola Bar sends mixed message to kids that candy is healthy.</p>	<p>The sugar content of some cereal/energy bars may be similar to candy bars; however they provide fiber, protein, and additional nutrients.</p>	<p><b>No - if meet standards</b></p>
<p>8. Baked potato chips, reduced fat Cheez-its and Elfin Crackers should be restricted. (x3)</p>	<p>Empty calories; no vitamins and minerals. Just because fat is reduced doesn't mean it's healthy.</p>	<p>Baked chips do provide some nutrients including calcium, protein, vitamin C, and fiber.</p>	<p><b>No - if meet standards</b></p>
<p>9. Foods with hydrogenated oils should be restricted. (x4)</p>	<p>These are harmful fats. There are currently comparable products without hydrogenated oils that are man-made, not occurring in nature. Used in junk food because they are inexpensive and shelf stable. Difficult for the body to process.</p>	<p>Hydrogenated oils contain trans fats or Trans Fatty Acids. These are restricted in the proposed standards. Due to the increasing research showing a link between trans fats and heart disease, many manufactures are eliminating the use of these hydrogenated oils.</p>	<p><b>No - however, should consider for the future as alternative products become available</b></p>
<p>10. Most or all jerky should be restricted. (x11) (See I-3)</p>	<p>High levels of sodium content, e.g., 590mg per serving for Jack Link's Beef Jerky. Sodium linked to heart disease and cancer.</p>	<p>The Arizona standards do not address sodium at this time, limiting the standards to macronutrients. The ADE would support a sodium standard of 800 mg maximum for program meal items sold as a la carte and 600 mg maximum for all other snack items sold as a la carte.</p>	<p><b>Must meet new sodium standard</b></p>

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<p>11. Eliminate pretzels and cookies.</p>	<p>Not providing sustainable energy; empty calories; too much sodium which can cause hypernatremic dyhydration in children with severe psychomotor retardation.</p>	<p>Hypernatremic dehydration only occurs when a significant amount of sodium is consumed. Cookies do not contain a significant amount of sodium. Pretzels are known to be high in sodium, however the portion sizes are limited. Additionally, the ADE created these standards with the average student in mind and based on federal guidelines and recommendation for the general public.</p>	<p><b>No</b></p>
<p>12. Saliditos, pickles, coffee, tea, salted pumpkin seeds should not be allowed.</p>	<p>Too high in sodium. Coffee and tea contain caffeine and usually sugar is added.</p>	<p>The Arizona standards do not address sodium at this time, limiting the standards to macronutrients. The ADE supports the restriction of caffeine. Currently the standards restrict energy drinks, but not necessarily all items containing caffeine.</p>	<p><b>No</b></p>
<p>13. Foods and beverages containing caffeine should be restricted.</p>	<p>A healthy school nutrition environment should not include sale or promotion of beverages that contain stimulants. 5 of the allowed flavors contain 3-5mg caffeine. Cool Mint Chocolate contains 50mg of caffeine. PowerBar Performance Bar Cappucino also has caffeine.</p>	<p>The ADE supports the restriction of caffeine. Currently the standards restrict energy drinks, but not necessarily all items containing caffeine.</p>	<p><b>No - however need to expand definition of "high energy drinks"</b></p>
<p>14. Eliminate processed cheese.</p>	<p>Children should not be eating processed food.</p>	<p>The ADE is not aware of any conclusive research that indicates children should not eat processed cheese.</p>	<p><b>No</b></p>
<p>15. Milk from cows treated w/ hormones should be restricted.</p>	<p>Evidence of effect on sexual maturity in children is anecdotal and limited but better to be safe than sorry.</p>	<p>This was not addressed at this time due to the lack of evidence relating milk with hormones to early sexual maturity in children.</p>	<p><b>No</b></p>

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16. Food dyes and artificial sweeteners in all foods should be restricted.	Children should not be exposed to potentially harmful additives.	The ADE is in support of prohibiting added sweeteners.	<b>No</b>
<b>Category IV: Beverage and food items that are listed in the AZNS (Appendix A- "unallowable") that should not be included:</b>			
<b>Request for Action</b>	<b>Justification</b>	<b>ADE Response</b>	<b>Panel Recommendation</b>
1. Whole milk should be allowed. (x5) (see II-1)	Milk is a healthy beverage with 9 essential vitamins and minerals that children need. Whole and 2% milk make up 67% of milk sold in AZ. Hispanics prefer whole milk.	The American Academy of Pediatrics does not recommend whole milk after 2 years of age. Additionally, Hispanics are among the highest minority group for prevalence of overweight and obesity.	<b>No</b>
2. 2% milk should be allowed. (x16 ) (see II-1)	A good snack and full of nutrition. USDA allows 2%. Would be difficult to meet USDA calorie requirements if eliminated. Kids might stop drinking milk and thereby eliminate calcium if 2% milk is restricted. Kids more likely to drink it compared to 1% and no fat. Research shows that kids who drink 2% show no difference in BMI or cholesterol than kids who drink 1%. Whole and 2% milk make up 67% of milk sold in AZ. No other state prohibits 2% milk.	Skim milk and 1% milk actually contain more nutrients since they replace the fat that was removed. 1% milk contains more calcium and vitamin A than 2% milk. Based on a blindfold taste test, kids indicate they prefer the taste of skim milk. Federal guidelines claim dairy products should be low fat or fat free.	<b>Yes</b>
3. 2% Flavored milk should be allowed. (x9) (see II-2)	Studies have shown flavored milk is less than 2% of total added sugars to the diet. Contains nutrients, especially calcium. Help kids get back in habit of drinking milk again. This product helps to boost revenue that the district needs for school food service.	There is a variety of flavored milk that will meet the current proposed nutrition standards for sugar. For example, the standards allow Lucerne 1% chocolate milk.	<b>Yes</b>

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4. Flavored milk with artificial sweeteners should be allowed. (x6)	Meets needs of special children, e.g. diabetics. Will decrease the total grams of sugar per serving and encourage kids to choose milk over sodas.	These beverages contain artificial sweeteners.	<b>Yes - must show that artificial sweeteners are used on label.</b>
5. No-calorie flavored waters should be allowed. (x6)	Good alternative to juice which has too much sugar and carbohydrates. More acceptable than plain water. Beverage option for diabetic kids. Would increase a la carte choices.	These beverages contain artificial sweeteners.	<b>Yes - must show that artificial sweeteners are used on label.</b>
6. Lo-calorie juices should be allowed.(x2)	Good alternative to juice which has too much sugar and carbohydrates. Beverage option for diabetic kids.	These beverages contain artificial sweeteners.	<b>Yes - but only in middle and junior high schools (6<sup>th</sup> grade+) and must contain no less than 50% juice, with nutrient values equal to 100% juice, and be labeled that artificial sweeteners are used</b>
7. Isotonic sports drinks, e.g., Gatorade, Propel and Vitamin Water should be allowed. (x43) Smaller portions suggested as an alternative.	Kids in Arizona play at temps. 20-30 degrees higher than recommended temps. Children need to have access to electrolyte replacement drinks during the day. Viable solution to dehydration during the day. Hydration is critical to preventing heat stroke. Outperform water as they encourage voluntary drinking and stimulate rapid fluid absorption. Less sugar than fruit juice. Will make the disappearance of soft drinks more acceptable. Calif. healthy school bill includes isotonic drinks.	Sports drinks (without heavy fortification) are only recommended for times of vigorous physical activity that last 60-90 minutes. Sports drinks are designed to be consumed during the participation of the sport, not for replacement of loss after the sport.	<b>Yes - but only in middle and junior high schools (6<sup>th</sup> grade+) with portions limited to 12 oz per single serving</b>

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<p>8. Items that are part of the reimbursable breakfast and lunch menus should be allowed for a la carte sales without restrictions. (x9) (see II-10)</p>	<p>NSLP schools do nutrition analysis on a weekly basis not per item. Under Offer vs. Serve guidelines students cannot be forced to take a reimbursable meal. Kids will not understand why they can get an entree in the full meal but not a la carte. Some kids only want an entree and a drink. Lack of consistency between reimbursable meal vs. a la carte items.</p>	<p>A la carte sales are intended for individual sale and shall be analyzed as such.</p> <p>Note: Several studies indicate that children that eat NSLP meals have better diets (decreased fat, decreased calorie, and increased vitamin intake) than children that eat from a la carte lines. Increasing the a la carte calorie standard to allow NSLP entrees to be sold individually does not support practices of healthy eating and good nutrition. Furthermore, a la carte items are not reimbursed by USDA, only program meals, therefore this may decrease the amount federal reimbursement a school receives. Also, students will be receiving incomplete meals. For example a slice of pizza without a serving of fruit, vegetable, or milk.</p>	<p><b>No</b></p>
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<p>9. Pastry restrictions should be relaxed or eliminated. (12) Pastries that meet AZ nutritional standards should be allowed, e.g. Super Donuts, SuperBuns. (x8)</p>	<p>Foods should be banned based on their lack of nutritional value not on what they are called. If pastries fit within the AZNS (calorie, fat and sugar restrictions), they should be allowed, e.g. Super Donuts and SuperBuns.</p> <p>Kids like pastries and eat them. Can be balanced with other nutritional items. Difficult to find fiber replacement that is affordable and that kids will eat. All foods can fit into a healthy diet as long as calories/portions are controlled. Should suggest, not demand, lower fat choices. Could be limited to specific number of servings per week or month.</p>	<p>The only superdonut that meets the standards is the reduced fat chocolate superdonut which only consists of 2% of sales in AZ. Additionally, these do not contribute to a model of healthy living.</p> <p>In review of breakfast menus in K-8 schools across the state one would find the most prevalent items served daily to be donuts, cinnamon rolls, and bear claws. These proposed standards will be educating students that soda should not be consumed daily at school but it is acceptable to consume these pastry items every morning for breakfast. Continuing to allow these items as breakfast choices will send the message to AZ students that these products are healthy alternatives.</p>	<p><b>Yes - but must meet standards</b></p>
<p>10. All foods except those on the FMNV list should be allowed. (x2)</p>	<p>The proposed food and beverage standards should indirectly drive what is allowed. All foods can fit into a healthy diet as long as calories are controlled. A healthy diet includes eating a variety of foods.</p>	<p>The legislature felt that the USDA FMNV list does not encompass all of the foods of concern; therefore, in the law they required the ADE to develop standards to ensure model food in K-8 schools.</p> <p>Unfortunately the FMNV list does not cover key nutrients, such as fat, that contribute to heart disease. In addition, many foods that are not incorporated into the FMNV do not contribute to a healthy model of living.</p>	<p><b>No</b></p>
<p>11. Sun Chips should be allowed.</p>	<p>Have 3 gm of fiber per serving and no trans fats.</p>	<p>They contain more than 30% of calories from fat. Fat has been shown to increase the risk for heart disease.</p>	<p><b>Yes - if meet standards</b></p>

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12. Plain tortilla chips should be allowed.	2 oz portion has 4 gm fiber and falls within the fat standard (8.2%).	Most tortilla chips have more than 4-5 grams of fat which eliminates them based on their grams of fat. This is more than 30% of total calories from fat.	<b>Yes - if meet standards</b>
13. Energy, sports, granola, and fruit bars should be allowed.	While they might exceed sugar and fat requirements, they are a better alternative than cookies because they do contain vitamins and minerals.	There is a large variety of these products that meet the standards. See allowable list.	<b>Yes - if meet standards</b>
14. Chocolate bars should be allowed.	Better occasional alternatives than foods with trans fats and high fructose corn syrup.	These are high in fat and saturated fat which has been shown to increase the risk for heart disease.	<b>No</b>
15. Add Crystal On the Go! And Nabisco's 100 Calorie Packs to allowable list.	Crystal On the Go! Has 3 calories and 2 mg of sodium per serving. 100 Calorie Packs have 100 calories and less than 3 gm of fat per serving. They are easy and fun for kids to drink.	Crystal On the Go! contains artificial sweetener. The 100 calorie packs are allowed if they fall within the nutrition standards.	<b>No to Crystal on the Go! Yes - Nabisco 100 Calorie Packs, if meet standards</b>
16. Lists of allowable/unallowable foods should be eliminated as part of the standards. (x6)	Could be available for guidance purposes only.	This is a good resource for schools that do not have a dietitian on staff and would like this resource list. The ADE has heard from several sponsors who want this list to help them meet the standards. The allowable/unallowable list will be made available upon request and as a web resource. They will not be published in the final version of the K-8 standards.	<b>No</b>
17. No calorie soft drinks			<b>Yes - but only in middle and junior high schools (6<sup>th</sup> grade+) with portions limited to 12 oz per single serving</b>
<b>Category V: Portion sizes listed for each group that are not appropriate and realistic and need to be changed</b>			
<b>Request for Action</b>	<b>Justification</b>	<b>ADE Response</b>	<b>Panel Recommendation</b>

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1. 12 oz. of milk should be reduced.	Is excessive for elementary school kids.		<b>No</b>
2. 12 oz. of smoothie should be reduced. (x3)	Too many calories. Should be limited to 8 oz. Fruit smoothies over 200-300 should be restricted.		<b>No</b>
3. 12 oz. milk portion should be increased (x12). 16-20 oz. suggested.	12 oz = only 1.5 of the recommended servings of milk per day. 2005 Dietary Guidelines for Americans and the American Dietetic Assoc. recommend three 8 oz servings each day of milk and milk products. Texas has 16 oz and Calif. has 20 oz.	The purpose of these standards were not to provide students with 100% of the recommended nutrients for the day. Although many students may meet their recommended dairy servings at school between breakfast and lunch.	<b>No</b>
4. Up to 8 oz. portion of whole milk should be included.	Whole and 2% milk account for 67% milk sold in AZ. Hispanics who make up 25% of school pop. prefer whole milk	The American Academy of Pediatrics does not recommend whole milk after 2 years of age.	<b>No</b>
5. Ice cream should be restricted based on serving size not on sugar, fat or calorie content.	Many ice cream products are 3-4 oz and the AZNS should permit that range.	Currently the standards allow ice cream to be offered in 3 oz portions.	<b>No</b>
6. A la carte entree and side dish portions should be no larger than NSLP portions.	Included in the Clark County School District regulations.	The ADE strongly agrees as long as calorie limits are met.  Note: Several studies indicate that children that eat NSLP meals have better diets (decreased fat, decreased calorie, and increased vitamin intake) than children that eat from a la carte lines. Increasing the a la carte calorie standard to allow NSLP entrees to be sold individually does not support practices of healthy eating and good nutrition. Furthermore, a la carte items are not reimbursed by USDA, only program meals, therefore this may decrease the amount federal reimbursement a school	<b>Yes - as long as calories limits are met</b>

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		receives. Also, students will be receiving incomplete meals. For example a slice of pizza without a serving of fruit, vegetable, or milk.	
7. Cheese portion should be revised to say 3 oz for entrée and 2 oz for side dish.	Would meet nutritional guidelines for entrees that are designed for students who don't eat meat. Becomes more significant at high school.	Two ounces is what the USDA requires as a meat or meat alternate portion size for the NSLP.	<b>No</b>
8. Up to 12 oz 100% juices should be allowed for vending machines and fund raisers. (x2)	Proposed portions are not frequently used in vending machines and fund raisers.	12 oz is allowed for Jr. High and Middle School.	<b>Yes</b>
9. Portion size for 100% juices should be 8 oz for both elementary and middle/junior high schools.	None given	The recommendations are for 12 oz for Middle and Jr. High Schools.	<b>No</b>
10. All portion sizes should be eliminated. (x5)	Calorie standard will indirectly control portion size and many healthy foods that are restricted by current portion sizes would be allowed. Calories per serving should be limited.	<p>It is important to maintain the portion size limitations specifically on snack food items. For example, a bag of baked chips may only have 150 calories in a 1.5 ounce serving (per the AZNS) if we allowed up to 300 calories with no portion restriction a student could eat 300 calories worth of non-nutrient dense chips in one bag. Additionally, the student may then purchase a piece of pizza containing 300 calories and juice that also contains 300 calories and now they are consuming 900 calories instead of 600.</p> <p>In conclusion, the calorie restriction of 300 calories is not to only serve food items in a portion size of 300 calories. This is a maximum amount. The thought process is to teach students what a</p>	<b>No</b>

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		reasonable or ideal portion size of snack items are.	
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