

Proposal for Nutrition Guidelines for City Contractors

Drafted by a working group of the Food Security Task Force

Summary of major points:

- The intent of these recommendations is to promote healthier food environments through the development of standard nutrition guidelines for food and food programs funded by the City.
- The draft guidelines have been developed by a working group of the Food Security Task Force and was reviewed by the Food Policy Council.
- Guidelines have been developed for City funded community based organizations and food programs that are not already covered and/or required to meet federal and/or state nutrition program guidelines (i.e. – food pantries, shelter meals, other free meal programs, etc.)
- These guidelines apply to regularly occurring programs, not one-time events or holidays.
- The Food Security Task Force recommends that City contracts for food programs include funding for agencies to conduct a nutritional assessment of the foods they are currently providing through their programs; specifically technical expertise to implement the nutrition assessment and evaluate the results. The assessment will allow the City funded agency and the City program officers to evaluate the nutritional quality of currently funded food programs in comparison to recommended nutritional guidelines, and work together to identify barriers and opportunities to improving the nutritional quality of food programs.
- Upon review of the nutritional assessment, a task force of stakeholders will need to be convened to address barriers in meeting nutritional guidelines and develop recommendations of how Food Programs and the City of San Francisco can collaborate to overcome these barriers.
- Drafting committee also recommends that the City also launch a social marketing campaign to promote changes to food programs among clients.

Organization of proposal:

1. Background
2. Nutritional Guidelines/Goals
3. Barriers to serving healthy food in anti-hunger food programs
4. Description of nutritional assessment initiative
5. Description of social marketing campaign

1. Background

Relevant Sections of Executive Directive on Healthy and Sustainable Food addressed by these recommendations:

4f. *City funding for food purchases or food programs shall meet nutritional guidelines developed by the City of San Francisco.* DPH, DAAS and DCYF will develop nutritional criteria for any food purchased or any food program funded using city funds, and will deliver these criteria to my office within 120 days of the signing of this directive. Within 150 days, these guidelines shall be distributed to all city departments and shall be incorporated into all city contracts for programs which serve food.

The guidelines below are based on guidelines and recommendations from *Dietary Guidelines for Americans* which was developed by health and nutrition experts from USDA and US Dept. of Health and Human Services; American Dietetic Association; Institute of Medicine, Food and Nutrition Board's Dietary Reference Intakes (DRI); San Francisco Nutrition Services *Guidelines for Healthy Meetings*, Food Security Task Force working group meeting discussion that we provide as much flexibility to meal providers while at the same time offer healthy food choices for consumers.

2. Nutrition Guidelines for Food Purchases or Food Programs Funded with City Funds

The nutrition guidelines listed below will help us meet the goals for healthy and sustainable foods in San Francisco. These guidelines are intended to guide the choice of food and meals served through contractors, specifically for the instances in which food is not already required to meet federal and/or state nutrition program requirements. For programs with federal and/or state nutrition guidelines, these will serve as supplemental guidelines.

General Guidelines:

1. With the exception as noted in Chapter 12.6, section 114377 (b) of the California Retail Food Code, trans fats or any fat, oil, shortening or margarine containing artificial trans fat, may not be used in the preparation of any food within a food facility. [Note: Cal Code allows trans fats be used in commercially produced baked goods and manufactured products.]
2. Provide a variety of nutrient-dense foods and beverages within and among the basic food groups while limiting foods high in fat, saturated fat and trans fat, added sugars and salt.
3. Serve healthy beverages, such as fat free or 1% milk, soy milk, 100% fruit or vegetable juice, water or iced tea (unsweetened), "aguas frescas," instead of soft drinks.
4. Provide pitchers of water for program participants and at meetings/events.

5. Provide a balanced meal pattern and to the maximum extent possible, meet the recommended nutrient intake and energy needs for the *appropriate age group* using the current Dietary Guidelines for Americans, or the Institute of Medicine, Food and Nutrition Board's Dietary Reference Intakes (DRI) for appropriate age groups, or the U.S. Department of Agriculture (USDA) Food Guide or the Dietary Approaches to Stop Hypertension (DASH) eating plan <http://www.health.gov/dietaryguidelines/dga2005/document>). The nutrients identified in these guidelines are based on target nutrients to promote health, indicate diet quality, prevent disease, prevent deficiencies and help manage chronic health conditions.
6. Serve at least two servings of fruit and/or vegetables with each meal; use a wide variety of seasonal and locally grown produce whenever possible.
7. Serve whole grain products, breads, rice or corn tortillas. Target to have at least half of the carbohydrates and grains served be whole grain.
8. Offer steamed, boiled, baked, grilled, or stir fried foods instead of deep fried.
9. Offer lean protein foods, including meat, fish, poultry, legumes, nuts, and seeds.
10. Include vegetarian option for meals whenever possible.
11. Offer calcium-rich foods with each meal, such as low fat or fat-free dairy products, calcium-enriched non-dairy beverages/products, dark leafy green vegetables, or other culturally appropriate substitutes.
12. Offer low fat or fat-free spreads and salad dressings, and limit high fat cream sauces.
13. Desserts: serve fiber-rich fruits and whole grain products, limit serving concentrated sweets, cakes and candies to three times a week or less.
14. To the maximum extent possible, offer minimally processed foods produced without added hormones or antibiotics, and unnecessary preservatives.
15. Alcoholic beverages may not be purchased with city funds.
16. Sodas may not be purchased with city funds or served in city funded programs.

Specific Guidelines to Aim For:

- **Fats:** Limit total fat intake between 20-35% of total calories, with most fats coming from sources of polyunsaturated and monounsaturated fatty acids, such as fish, nuts and vegetable oils. Limit use of food products with trans fats to three times a week or less.
- **Carbohydrates:** Recommend 45-65% of calories from carbohydrates. Choose fiber-rich fruits, vegetables and whole grains often. Choose and prepare foods and beverages with little added sugars or caloric sweeteners.

- **Proteins:** Recommend 10-25% of calories from protein. Choose lean, low saturated fat protein sources including lean meats, poultry, fish, legumes, nuts, and seeds.

Sodium: Recommend 800 mg or less per meal or 2300 mg (approximately 1 teaspoon of salt) of sodium per day by limiting use of processed products and seasoning high in sodium. For meals that exceed 1,000 mg sodium per meal, provide a low sodium meal option.

Children:

Recommend agencies serving populations with a majority under 19 years of age to follow the Institute of Medicine, Food and Nutrition Board's Dietary Reference Intakes (DRI) for appropriate age groups. Besides the general guidelines above, below are added guidelines/clarifications for agencies that serve children.

When milk is provided, children age two and up shall be served milk or milk substitutes with 1% or less fat. Children under age 2 shall be served whole milk or milk substitutes. Limit use of flavored milk/milk substitutes with added sugar.

Caffeinated beverages may not be purchased with city funds.

Fiber: For children 4 to 19 years old, target to provide 25 grams or more fiber per day. Children age 1 to 4, target to provide 19 grams or more fiber per day.

Recommend juice to no more than 2 servings a day.

3. Barriers to serving healthy food in anti-hunger food programs

In an ideal world, San Franciscans would have the means and access to procure adequate amounts of fresh, locally produced food. The current reality is that many people are hungry and in need of food in San Francisco every day and the need is growing as the economy sluggishly begins to turn around. Nutritious food helps children to learn and thrive, adults to lead productive lives, and seniors to maintain their independence. Yet fresh, healthy foods are the least affordable, forcing many low-income people to rely on cheaper, processed foods high in unhealthy fats.

“The observed links between obesity and socioeconomic position may be related to dietary energy density and energy cost. Refined grains, added sugars, and added fats are among the lowest-cost sources of dietary energy. They are inexpensive, good tasting, and convenient. In contrast, the more nutrient-dense lean meats, fish, fresh vegetables, and fruit generally cost more.”¹

After years of shrinking budgets, most meal and pantry providers are struggling to expand programming to meet the needs just with the resources available to them from local vendors or food banks. Faced with continuing budget cuts and growing numbers of clients, many agencies have had to resort to price being the determinant when it comes to designing menus.

We recognize that supporting good nutrition can be a powerful approach to lifting people out of poverty; we balance this perspective with awareness that all people, regardless of income, should be empowered to make their own food choices, including snacks and treats.

We have chosen to set nutritional goals rather than implement strict nutrition guidelines, as strict guidelines would likely force meal providers to allocate their funds accordingly which could result in feeding fewer clients with already limited resources. Processed, refined foods tend to be cheaper and while admittedly less nutrient dense, these foods can provide the necessary calories, choice and/ or comfort for an individual to get through the day.

The goal of nutrition guidelines is to uncover the resources needed for agencies to expand their healthier options. By asking that all city-funded agencies conduct a nutrition assessment that will inform the development of agency specific Nutrition Action Plans to improve the nutritional quality of food served.

As the City works to increase the nutrition quality and sustainability of San Francisco’s food system, it will be important to balance existing resources with desired goals. It is illustrative to understand how a similar San Francisco policy initiative focused on sustainability of food packing created the unintended consequences of reducing food resources for the elderly and poor. An analysis of the Food Service Waste Reduction Ordinance (295-06 effective June 1, 2007) ordinance’s impact to the nutrition contractors of the Department of Aging and Adult Services showed that “the ordinance increased nutrition operation [costs] by an annual estimate of \$116,430, which is equivalent to the food cost for producing about 54,155

¹ Adam Drewnowski and Nicole Darmon, “The economics of obesity: dietary energy density and energy cost” American Journal of Clinical Nutrition, Vol. 82, No. 1, 265S-273S, July 2005

meals.”² Although a hardship waiver can be obtained if the agency demonstrates that there is no suitable product that is within 15% of the cost of non-compostable or non-recyclable alternatives, it is not clear whether nutrition contractors are aware of this hardship waiver or whether they would qualify. Regardless, for agencies serving San Francisco’s most vulnerable residents, resources are extremely limited and declining. Budget cuts to these programs are coming at a time when the need for food resources is increasing at unprecedented rates. Additional environmental or nutrition requirements for the City’s non profit contractors must be made possible with additional resources to accomplish these important goals.

4. Description of Nutritional Assessment and Nutrition Action Plan

The Drafting Committee recommends that food programs funded by City, federal and/or state funds will follow the Nutrition Guidelines for City Contractors previously outlined. Food programs that are funded by City funds are often not regulated by any local, state or federal nutrition guidelines.

In order for all food programs funded by City Funds to begin to meet the recommended nutritional principles and guidelines, we recommend that each food program participates in a nutritional assessment of the foods they are currently providing through their programs. The development and administration of the assessment would be funded through city funding. Through this simple assessment, each program will be able to measure the gaps between the recommended nutritional guidelines and the current nutritional status of each program’s menus. Since each food program funded by the City may be held to different nutritional standards and regulations, the assessment process will allow each program to understand where changes in procurement, menu selection, and operations can help the program meet the recommendations outlined. City contractors who have pre-existing nutritional assessment tools may choose to use them instead of the tool developed by the city.

At the completion of the assessment process, the Food Policy Council, Food Security Task Force, and city program managers will be able to analyze data from all food programs to understand the underlying issues preventing them from meeting the recommended nutritional guidelines. From this data, the Food Policy Council and Food Security Task Force will be able to ascertain the barriers food programs face in providing nutritionally balanced meals to their clients. Many of the barriers that food programs face in meeting the recommended standards will fall into five distinct categories; Operations, Procurement, Education, Funding Constraints, and Policy.

For all City Funded food programs to meet the goal of the recommended Nutritional Principles and Guidelines there will have to be active collaboration between food programs, city departments administrating the contracts, the Food Policy Council and Food Security Task Force, the Board of Supervisors and the Mayor’s Office, to address these barriers. It is imperative that all parties work in collaboration to meet these goals, rather than placing the onus of meeting these recommendations purely on the contractor. It is recommended that the City funds any and all cost increases incurred for food programs to meet the Nutritional

² San Francisco Department of Aging and Adult Services “Food Service Waste Reduction (FSWR) Ordinance survey Summary – Impact of Implementing FSWR Ordinance in FY 2008-09.” September 23, 2009.

Guidelines and/or increases each food program contracted funding so that programs are able to both meet the increase demand for free food while also increasing the nutritional quality of food served to San Francisco's most vulnerable populations.

Proposed next steps:

Inventory all food programs funded by City funds to establish communication concerning the implementation of this policy recommendation.

Develop Food Program Assessment for Food Programs to evaluate their programs in comparison to recommended nutritional guidelines.

Collect and analyze data from assessment to assess overall alignment with recommended nutritional guidelines, gap between current status recommended goals, and identify barriers Food Programs face to implement new nutritional guidelines.

Convene task force of stakeholders to address barrier in meeting nutritional guidelines and develop recommendations of how Food Programs and the City of San Francisco can collaborate to overcome barriers.

Develop comprehensive timeline to implement recommendations and technical assistance for implementation support.

5. Description of social marketing campaign

In order to support clients' acceptance of new menus, we propose that the City fund a social marketing campaign, recognizing the importance of backing a broad initiative with a culturally competent message designed to promote best aspects of proposed guidelines such as seasonality, locally-sourced and healthful.

An effective campaign should avoid any suggestion of *imposing* standards as this invites pushback –the attention garnered by NY City efforts is instructional – rather, an effective campaign will highlight the broad array of benefits to be enjoyed by adapting to a more healthful, seasonal, locally sourced diet.

Finally, consideration should be given to branding: a simple formulation can capture a broad message and take up very little space in our over-packed, media-assaulted brains. Example: "Eat. Right. Now" captures different aspects of our goal and is easy to remember. The Dairy Lobby has been particularly skilled when it comes to messaging ("Got Milk" and "Milk, it does a body good") are a permanent part of the pop culture landscape.