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April 23, 2012

**Julie Brewer**  
Chief, Policy & Program Development Branch  
Child Nutrition Division  
Food and Nutrition Service  
U.S. Department of Agriculture  
3101 Park Center Drive  
Alexandria, VA 22302

Re: RIN 0584-AD96

Dear Ms. Brewer:

On behalf of the American Heart Association (AHA), including the American Stroke Association (ASA) and over 22.5 million AHA and ASA volunteers and supporters, we appreciate the opportunity to provide comments on the proposed administrative and operational requirements for the Fresh Fruit and Vegetable Program (FFVP).

AHA strongly supports the FFVP. Fresh fruits and vegetables are rich in nutrients, low in calories, and high in fiber; and diets rich in fruits and vegetables have been shown to lower blood pressure, improve other cardiovascular disease risk factors, and lower the risk of developing cardiovascular disease.<sup>i</sup> Yet fruit and vegetable consumption in the United States remains too low with only ten to twenty percent of children eating the recommended five or more servings a day, with those from low-income households generally consuming the least.<sup>ii,iii</sup> Recent data, however, has shown that the FFVP is helping to increase fruit and vegetable consumption among children. Children who participate in the program consume, on average, an additional one-quarter cup of fruits and vegetables on days when the program is operating. This represents a nearly 15% increase in consumption over children in non-FFVP schools.<sup>iv</sup> In addition, the FFVP exposes children to a wide variety of fruits and vegetables, encourages children to include fruits and vegetables in their overall diet, and helps children develop positive dietary habits early in life.

AHA looks forward to the continued operation of this valuable program. We believe the administrative and operational requirements contained in the proposed rule will further strengthen the program and improve dietary outcomes. There are, however, a few modifications that we recommend such as increasing the minimum number of days schools must offer the program from twice a week to four times a week and expanding the evaluation requirements to better determine student engagement and program effectiveness. These recommendations and others are delineated below.

### ***School Selection***

AHA supports the selection criteria contained in the proposed rule. We agree that state agencies should focus on schools with at least 50% of their students certified as eligible for free or reduced-price school meals, with priority given to schools that serve the highest percentage of low-income students. This requirement will help ensure that children from socio-economically disadvantaged families, who tend to have lower rates of fruit and vegetable consumption, have access to the FFVP.

We are, however, concerned that schools – even those with high percentages of low-income students – could drop in and out of the program on a yearly basis as the number of students eligible for free or reduced-price meals fluctuates. For example, a school with 90% free and reduced-price students may be selected for participation in the FFVP for the 2012-2013 school year; however, the school could be dropped the following year if the percentage falls to 85% and the state lacks sufficient funds to cover schools at that level. That school could then be restored to the program in a future year if the percentage increased to the state's threshold, leaving the children confused and potentially misguided regarding the value of produce in the diet.

Children would be better served by greater continuity in the program. Implementing the FFVP in a school, thereby having students grow accustomed to – and anticipate – receiving a fresh fruit or vegetable snack, only to then discontinue the program will undoubtedly reduce the FFVP's effectiveness. Changing eating behavior and improving health outcomes takes time. We encourage the Agency to consider methods to promote continuity and longevity of the FFVP, especially in schools with a high percentage of students eligible for free or reduced-price meals. The USDA and state agencies should make every effort to keep the FFVP in place in high need schools.

### ***Program Assistance and Monitoring***

Under the proposed rule, state agencies would be required to provide training and technical assistance to enable schools to operate the program correctly. We support this requirement and further recommend that the training emphasize best practices to maximize student participation. For example, state agencies can provide training on the importance of food presentation in helping to increase selection. Schools should be encouraged to offer clean, brightly-colored, easy to eat fruits and vegetables, perhaps with creative, kid-friendly names. Pre-cut apple slices or baby carrots, and other food presentation practices have been shown to increase student acceptance of these foods. Proper storage and safety techniques are also needed.

### ***Reporting and Recordkeeping***

As currently proposed, state agencies would be required to submit an annual report disclosing the number of schools that applied for the FFVP, the number of schools selected, the enrollment and percentage of free and reduced-price participation for each selected school, and the per student allocation being made to each school, as well as the number of schools that were not selected and the percentage of free and reduced-price eligible students served by those schools. AHA agrees that state agencies should be required to provide this information on an annual basis; however, this report focuses only on *school selection statistics*. A more robust evaluation of the program seems in order. We recommend that a select number of schools be required to undergo additional evaluation focused on program effectiveness. These schools should be required to track and quantify what is being consumed, what is being discarded, and the average intake of fruit and vegetable consumption among students. These schools should also conduct a survey to measure student engagement with

the program, and whether students bring their enthusiasm home to their parents and/or caregivers to purchase more fruits and vegetables for consumption outside of school. The data will allow the USDA and supporters of the FFVP to continue to demonstrate the value of this program.

### ***School Application***

AHA supports the school application criteria included in the proposed regulation, particularly the requirement that schools submit an implementation plan that describes how they will integrate the FFVP with other efforts to promote children's health, nutrition, and physical activity, and to reduce overweight and obesity. Encouraging schools to integrate the FFVP with other nutrition education and healthy living activities will reinforce the importance of including fruits and vegetables as part of a healthy lifestyle. Integrating the FFVP with other school activities that complement one another (such as a teaching garden)<sup>v</sup> may also produce greater behavior change.

We further recommend that the Agency require schools to submit a communications plan describing how the school intends to promote or publicize the FFVP to students and their parents. Our recommended approach follows below.

### ***Publicizing the FFVP in School***

Schools selected for participation in the FFVP are responsible for promoting the program within the school. According to the proposed rule, schools can promote the program and encourage student participation by allowing classroom teachers to also eat the fruit or vegetable being served to the children. AHA strongly supports this provision and urges the Agency to encourage teachers to serve as role models for children. Their enjoyment of the fruit or vegetable snack can have a positive impact on students who often lack the opportunity to eat meals and snacks with other adults. Teachers can also benefit from this practice while reinforcing the nutrition education message as part of the class curriculum.

The USDA should also encourage schools to explore other methods to promote the program. Schools could, for example, post signage or menus around the school, incorporate references to the FFVP in the nutrition education curriculum and the physical education program, and engage the school nurse (where available) to help promote the program. Schools should also publicize the program to parents through school newsletters, online menus, and back-to-school nights.

### ***Program Operation***

AHA is concerned about the frequency requirement contained in the proposed rule. As proposed, schools would be encouraged to provide a fresh fruit or vegetable "as frequently as possible", but required to do so only twice a week. This is not a sufficient minimum requirement. The FFVP was created to increase consumption of fruits and vegetables among children, and as discussed above, the program has proven as to be successful – consumption increases by 15% on days the FFVP is in operation. However, to have the most impact, the FFVP should aim to increase consumption *every* day in order to establish the desired healthy lifestyle behaviors.

We urge the Agency to increase the minimum frequency requirement. Ideally, schools would participate in the FFVP five days a week. Since we recognize this may not always be possible, particularly for schools in rural areas that may have difficulty securing weekend produce deliveries for Monday service, we recommend that USDA revise the frequency requirement to a minimum of four times a week. We believe this requirement is reasonable, particularly since many schools

already provide FFVP service four or five times a week and are able to do so under the statutory funding levels established by Congress.

### ***Food Eligible to be Served***

AHA strongly supports the requirement that schools only serve fresh fruits and vegetables in their raw state as part of the FFVP. We agree with the Agency that the intent of the program is to provide *fresh* produce to students, therefore, frozen, canned, and dried fruits and vegetables should not be allowed. The provision of fresh fruits and vegetables will allow children to experience these foods in their natural, unprocessed state. And unlike the National School Lunch and School Breakfast Programs, which allow schools to serve processed, cooked, and juiced fruits and vegetables, the FFVP is the only nutrition program that ensures that children will have access to fresh, whole fruits and vegetables.

In addition, we agree that small amounts (two ounces or less) of low-fat or non-fat dip may be served with vegetables to potentially enhance the flavor of these foods and increase greater student acceptance. We also agree with the Agency that dip for fruit should not be allowed as fruit already contains natural sugars and is generally acceptable on its own.

### ***Use of Program Funds***

According to the proposed rule, schools would be required to spend the majority of FFVP funds on the purchase of fresh fruits and vegetables. AHA agrees with this provision; FFVP funds should primarily be used for the purchase of fresh produce. We are aware, however, that some school districts are concerned that the proposed 15% limit on non-food costs may not be sufficient. We understand that it may require more than 15% – particularly for schools that participate in the program for the first time – to obtain the necessary equipment such as adequate refrigeration to foster sustainability for the program. So we encourage the USDA to work with schools to ensure that the proposed 15% non-food limit does not prohibit schools' participation in the program. Schools may require additional flexibility, particularly in the first year of program participation.

### ***Conclusion***

In closing, AHA reiterates our strong support for the Fresh Food and Vegetable Program. Increasing fruit and vegetable consumption is a key recommendation of the 2010 Dietary Guidelines for Americans, the MyPlate dietary guidance, and AHA's Diet and Lifestyle Recommendations, as well as a focus of the new nutrition standards for the National School Lunch and School Breakfast Programs. The FFVP addresses this need by exposing children to a wide variety of produce and encouraging children to include fruits and vegetables in their diet. The program has proven to be a success – increasing fruit and vegetable consumption by 15% compared to non-participating schools – and has accomplished this goal without increasing overall caloric intake.<sup>vi</sup>

We look forward to the continued operation of this valuable program and we appreciate the Agency's efforts to implement administrative and operational requirements that will strengthen the FFVP. However, as discussed above, we recommend that the USDA make a number of changes to the proposed rule to further improve the FFVP. Specifically, the Agency should:

- Encourage state agencies to maintain funding for high need schools
- Require schools to submit a communications plan as part of their application

- Encourage state agencies to provide schools with training on food presentation, food storage, and food safety techniques
- Implement a more robust reporting and evaluation program in selected schools
- Revise the minimum frequency requirement from two times to four times per week
- Consider raising the non-food limit to allow schools to purchase needed equipment

Thank you for your consideration of our comments. If you have any questions or need any additional information or assistance in addressing these recommendations, please do not hesitate to contact Susan Bishop at (202) 785-7908 or [susan.k.bishop@heart.org](mailto:susan.k.bishop@heart.org).

Sincerely,



Gordon F. Tomaselli, MD, FAHA  
President  
American Heart Association

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<sup>i</sup> Diet and Lifestyle Recommendations: A Scientific Statement from the American Heart Association Nutrition Committee; 2006.

<sup>ii</sup> Heart disease and stroke statistics--2012 update: A report from the American Heart Association.

<sup>iii</sup> American Dietetic Association. "Inadequate Fruit And Vegetable Consumption Found Among U.S. Children." ScienceDaily, 2 Mar. 2009. Web. 4 Apr. 2012.

<sup>iv</sup> U.S. Department of Agriculture. Evaluation of the Fresh Fruit and Vegetable Program: Interim Report. September 2011

<sup>v</sup> Information about teaching gardens is available on the American Heart Association website at [http://www.heart.org/HEARTORG/GettingHealthy/HealthierKids/TeachingGardens/TeachingGardens\\_UCM\\_436602\\_SubHomePage.jsp](http://www.heart.org/HEARTORG/GettingHealthy/HealthierKids/TeachingGardens/TeachingGardens_UCM_436602_SubHomePage.jsp).

<sup>vi</sup> U.S. Department of Agriculture. Evaluation of the Fresh Fruit and Vegetable Program: Interim Report. September 2011.