

## Changes to Nutrition Standards based on public feedback

The Philadelphia Nutrition Standards, mandated by Executive Order No. 4-14 in June 2014, were revised in spring/summer 2021 to align with the newly released 2020-2025 USDA Dietary Guidelines for Americans, the updated NYC Department of Health and Mental Hygiene Food Standards and to reflect recommendations from Philadelphia Department of Public Health (PDPH) staff, City departments and partners. PDPH solicited comments on the revised standards by posting them publicly on the City's website ([www.phila.gov/nutritionstandards](http://www.phila.gov/nutritionstandards)) in October 2021 and sharing with affected City agencies, the Philadelphia Food Policy Advisory Council and other partners. Reviewers could submit feedback via an online form. Feedback was compiled and evaluated by PDPH staff.

### Summary of feedback

Some feedback addressed specific changes to the individual standards. See recommendations and PDPH's final decision on how to address the feedback in the chart below.

Recommendation Area	Recommendation	Final Decision
Priority areas	Add processed foods	Did not add as separate priority area since addressing processed foods in other areas of the standards (limits on sodium, pre-fried/breaded products, and processed meats)
Priority areas	Reduce sugar	This was already included as part of food preparation, added as its own priority area
Priority areas	Quality of food	Already listed as a priority area
Priority areas	Less calorie dense foods	Address this via other standards, did not add as a separate priority area, refrain from focus on calories
Whole grains	Increase requirement for whole grains- at least half whole grains (DGA) or all grains should be whole grain-rich	Keep as is for now to align with other guidelines (CACFP) and to be mindful of those who don't typically consume whole grains
Dairy	Add unprocessed cheese to Recommended column	Added to Standards
Sugar sweetened beverages (SSBs)	Place stricter limits on or eliminate beverages with added sugars	Keep as is for now as current standard does limit SSBs to $\leq 40$ calories per serving, and do have a recommendation to gradually eliminate; SSBs already limited for youth
Artificially sweetened beverages (ASBs)	Quantify limit on products with artificial sweeteners	Changed to limit to one serving per day for beverages; ASBs already limited for youth

Plant-based/vegetarian	Include considerations for more plant-based/vegetarian menu options	Language included in standards- require at least one plant-based/vegetarian option for lunch/dinner
Breastfeeding	AAP/WHO recommends infants be exclusively breastfed for the first 6 months of life	Changed ECE standards on page 8 to specify this
Child care facilities water/lead testing	Child care facilities serving fewer than 13 children also be required to test potable water outlets for lead	PDPH can't mandate this via the Nutrition Standards; changed language in ECE Standards on page 7 to say the requirement addresses centers only, but family/group sites that serve fewer than 13 children are recommended to test and can utilize available resources as well
Child care standards	Opportunity to implement standards with non-PHLpreK providers	Nutrition Standards only impact City-funded programs so can't add this to the standards document, but partners are free to share the standards as recommendations to other providers
Values-based purchasing	Align with Good Food Purchasing Program, include more resources to help with implementation	No change to Standards as definitions/resources already included, but will discuss with Departments as part of goal-setting.
Culturally appropriate meals	Recognize that health/nutrition may mean different things to different cultures, offer culturally relevant foods, offer more choice on menus	Added new paragraph to Standards on page 15. Address individually with departments as part of goal-setting.

Other feedback pertained to the implementation process, providing training and technical assistance to departments, collecting participant feedback on meals, ongoing monitoring and reporting and sourcing of foods. PDPH will address these topics with departments as part of follow up conversations.

**Next steps with implementation and follow-up with departments and partners (February/March 2022):**

- PDPH staff will coordinate meetings with all City departments to share updates, discuss recommendations and determine next steps
- Post final standards online at [www.phila.gov/nutritionstandards](http://www.phila.gov/nutritionstandards) and share final draft with partners that provided feedback

- Discuss at Food as Strategic Initiative Leadership Table meeting to inform leadership of departments and connect back to the FPAC policy recommendations
- Update existing materials/resources and share with departments

**Over the next year, follow-up with individual City departments will entail:**

- February to July: Meetings to review/discuss final standards, address public feedback, assess priority areas and set goals; focus areas include:
  - Collecting feedback from eaters to inform menus: mechanisms and frequency
  - Good food purchasing goals: increasing purchase of local, sustainable, fairly-produced foods
  - Culturally-tailored meals: discuss feasibility
  - Supporting staff training on Standards
  - Monitoring vendor compliance with Standards and contacting GFPC if there's an issue with noncompliant product.
- July to December:
  - Review contracts and menus/nutrition analysis annually as part of contract renewal process and provide recommendations to departments as needed
  - Share report back on progress related to PNS to departments and publicly

For questions or more information about this process, contact [jennifer.aquilante@phila.gov](mailto:jennifer.aquilante@phila.gov).