

COUNTY OF SANTA CLARA, CALIFORNIA

NUTRITION STANDARDS 2012 IMPLEMENTATION GUIDANCE

*For: County Meetings and Events, Vending, Cafeterias, County-Leased-Properties
and Custodial Populations*



Santa Clara County
**PUBLIC
HEALTH**

Acknowledgements

The Santa Clara County Board of Supervisors acknowledges the work of the County Nutrition Standards Committee whose recommendations formed the basis for the County Nutrition Standards – 2012. The County Nutrition Standards Committee included representatives from the following County departments/agencies: Office of County Executive, County Counsel, Public Health Department, Facilities and Fleet Department, Department of Correction, Probation Department, Procurement, Health & Hospital System, and Social Services Agency.

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Introduction

Santa Clara County has been a leader in creating healthy food and beverage policies. Beginning in 2005, the County approved a healthy food and beverage vending policy. In 2008, a healthy beverage policy was adopted which resulted in significant improvement in the overall nutritional quality of beverages served throughout the County system, affecting approximately 15,000 employees and thousands of community residents who participate in County programs, meetings and events each year. In 2008, the County also passed a menu labeling ordinance affecting chain restaurants. Menu labeling was subsequently passed into law by the State of California and was later incorporated into the Affordable Care Act (ACA) in 2010. During 2010, Santa Clara County was the first county in the nation to create an ordinance requiring restaurants in unincorporated Santa Clara County to meet minimum nutrition standards for food offered in kids' meals.

In September 2010, the U.S. Department of Health and Human Services (HHS) awarded \$31 million to ten communities and one state, and Santa Clara County was one of the recipients of this prestigious grant and awarded \$3.6 million to support public health efforts to reduce obesity and increase physical activity and improve nutrition. The local obesity prevention award, funded by the Prevention and Public Health Fund included in the Affordable Care Act is are part of the HHS *Communities Putting Prevention to Work* (CPPW) program, a comprehensive prevention and wellness initiative administered by the Centers for Disease Control and Prevention (CDC) and designed to improve the health of Americans and lower the nation's health care costs. This grant has allowed the Santa Clara County Public Health Department to expand its obesity prevention efforts through policy, systems, and environmental change.

Under the direction of the County Board of Supervisors and the leadership of the Office of the County Executive, the Public Health Department has developed a comprehensive set of County nutrition standards based on best-practice national guidelines. These standards were developed with input from national experts and in collaboration with the County Nutrition Standards Committee comprised of the Office of the County Executive, County Counsel, and the Departments of Public Health, Facilities and Fleet, Correction, Probation, Procurement, Santa Clara Valley Medical Center, and the Social Services Agency. The County Nutrition Standards will serve as a model of healthy eating for local organizations, businesses, and residents as well as other governmental jurisdictions.

Purpose and Impact

The County of Santa Clara is committed to supporting healthy living by ensuring that food and beverages offered, purchased, or served at County facilities and provided by County departments are of maximum nutritional value. These County nutrition standards were developed:

- (1.) to improve access to healthy food choices by contracting with vendors who will support the County's efforts to create healthier food environments by providing nutrient-rich food choices for employees/customers;
- (2.) to ensure that food and beverages purchased for custodial populations with public dollars meet updated, national nutritional guidelines; and
- (3.) to further the cultural shift in support of health and wellness within the County systems and to help serve as a model for other governmental jurisdictions and private sector businesses.

Offering food options of maximum nutritional value is one of the most direct ways that the County can promote the prevention of chronic disease for its custodial populations, employees, and visitors. Research has shown that dietary factors contribute substantially to preventable diseases and premature deaths.¹ Experts report that

¹ Goodarz Danaei, et al, The Preventable Causes of Death in the United States: Comparative Risk Assessment of Dietary, Lifestyle, and Metabolic Risk Factors, PLoS Med 6(4): e1000058, (April 2009). Retrieved from: <http://www.plosmedicine.org/article/info%3Adoi%2F10.1371%2Fjournal.pmed.1000058>

American diets are low in fruits, vegetables and whole grains and are generally high in refined carbohydrates, total fat, saturated fat, and sodium. In the United States, dietary factors are associated with 4 of the 10 leading causes of death: coronary heart disease, some types of cancer, stroke, and type 2 diabetes.² In Santa Clara County alone, more than half of the adults and a quarter of middle and high school students are overweight or obese.³ The total annual cost to California for overweight, obesity and physical inactivity has been estimated as \$41.2 billion – \$21.0 billion for overweight and obesity alone.⁴

The County of Santa Clara is the second largest employer in the county, with a workforce of more than 15,000 employees in more than thirty departments/agencies. The County also serves thousands of community residents that participate in its programs, meetings and events each year. Meals and snacks are served to both employees and the public on County owned and/or leased properties. Combined there are more than 200 vending machines, 12 cafeterias and cafés, and 9 County-leased properties that include venues such as the Santa Teresa Golf Course, Twin Creeks Sports Complex, and the County Fairgrounds.

Santa Clara County also serves tens of thousands of meals a week and millions of meals annually to its custodial populations through the County jails, youth ranches, hospital, and other programs.

- Department of Correction - 4 million meals per year
- Department of Probation - 500,000 meals per year
- Social Services Agency - Senior Nutrition Program – 1.2 million meals annually
- Santa Clara Valley Medical Center serves 300,000 patient meals per year and 450,000 meals to customers in their cafeteria and cafés

County organizations, particularly those who serve custodial populations, currently serve nutritionally sound meals and use healthy cooking techniques. The organizations that serve custodial populations have made great strides to improve the types of beverages and food offered over the recent years. Some of these accomplishments include:

Department of Correction

- Improvements to inmate meals – substituted lean ground turkey for ground beef (reduced fat); substituted textured vegetable protein (soy) in entrees (reduced fat and increased fiber); switched to light mayonnaise (reduced fat); reduced trans fats in all foods; and purchased 50% of seasonal fresh fruits and vegetables from local farms (increased fiber).
- Improvements to Officer's Dining Room - removed soda machines (reduced added sugar).

Probation Department

- Improvements have included: addition of egg whites to frozen whole eggs when preparing scrambled eggs (reduced fat and cholesterol); substituted lean ground turkey for 80% of ground beef in all recipes (reduced fat); substitute whole wheat flour for white flour in most recipes (increased fiber); instituted nightly healthy snack, a piece of fresh seasonal fruit, after the dinner meal (increased fiber); "right-sized" all portion sizes (reduced calories, fat, and added sugars); and using *NutriKids* software to analyze all recipes (reduce calories, fat, sodium, and cholesterol) while ensuring youth meet nutritional requirements.

Social Services Agency – Senior Nutrition Program

- Improvements have included: eliminated use of chocolate milk (reduced added sugar); no trans fat in any food products; increased amount and frequency of whole grain products (increased fiber); substituted

² University of Minnesota School of Public Health. Guidelines for Offering Health Foods at Meetings, Seminars, and Catered Events (2008). Retrieved from: http://www.sph.umn.edu/img/assets/9103/Nutrition_Guide_2008.pdf

³ Santa Clara County 2010 Health Profile Report, Santa Clara County Public Health Department (2010), p. 50. Retrieved from: http://www.sccgov.org/sites/sccphd/en-us/Partners/Data/Documents/SCC_Health_Profile_Report_online_final.pdf

⁴ The Economic Costs of Overweight, Obesity, Physical Inactivity Among California Adults, 2006. California Center for Public Health Advocacy, (2009)

fruit or 100% fruit juice in place of sugary desserts daily (reduced fat and added sugar); non-fruit dessert option offered twice per week (previously desserts served daily).

Santa Clara Valley Medical Center (SCVMC)

- Pediatric menus were reviewed and revised to include the following changes: (1) Juices containing high fructose corn syrups were removed and replaced with fruits. (2) High sugar cereals were replaced with whole grain cereals. (3) White bread was replaced with high fiber bread.
- The Better Eating and Education Team (or BEET) was formed, a multi-disciplinary team including nutrition student volunteers from San Jose State University, to create and provide healthier food and beverage options for the hospital's patients, employees, and the general public.
- Improvements have included: use of healthy cooking techniques such as baking instead of frying (reduced fat); substituted healthy oils in place of butter and shortening (reduced saturated fat); replaced herbs for salt in most recipes (reduced sodium); reduced overall portion sizes (reduced calories, fat, and added sugar); and added healthier snack options such as fresh fruit, 100% fruit bars, and 100 calorie snack packages (reduced calories, fat, added sugar).
- To educate customers nutrition labeling prominently placed by food items and the hospital created a Nutrition Corner located in the SCVMC cafeteria and offers nutrition education materials.

The County Nutrition Standards build upon past and current practices. Adoption of these standards will serve to focus on additional improvements that are above and beyond those guidelines that are mandated by state and federal funding requirements.

Nutrition Standards Overview

These nutrition standards are based on, and follow the *Dietary Guidelines for Americans 2010* <http://www.health.gov/dietaryguidelines/dga2010/DietaryGuidelines2010.pdf>. By law (Public Law 101-445, Title III, 7 U.S.C. 5301 et seq.), the Dietary Guidelines for Americans are reviewed, updated if necessary, and published every five years. The United States Department of Agriculture (USDA) and the United States Department of Health and Human Services (HHS) jointly create each edition. *Dietary Guidelines for Americans, 2010* is based on the Report of the Dietary Guidelines Advisory Committee on the Dietary Guidelines for Americans, 2010 and with consideration of Federal agency and public comments. These updated Dietary Guidelines call for the following lifestyle approach:

- Reduce the incidence and prevalence of overweight and obesity by reducing overall calorie intake and increasing physical activity.
- Shift food intake patterns to a more plant-based diet that emphasizes vegetables, cooked dry beans and peas, fruits, whole grains, nuts, and seeds. In addition, increase the intake of seafood and fat-free and low fat milk and milk products and consume only moderate amounts of lean meats, poultry, and eggs.
- Significantly reduce intake of foods containing added sugars and solid fats because these dietary components contribute excess calories and few, if any, nutrients. Furthermore, reduce sodium intake and lower the consumption of refined grains, especially refined grains that are often coupled with added sugar, solid fat, and sodium.

This document outlines comprehensive nutrition standards for beverages and food that are purchased, served or offered at County facilities and those provided by County departments or agencies. The County Nutrition Standards have been developed for five different food environments:

- (1.) Meetings and events;
- (2.) Food and beverage vending machines;
- (3.) Cafeterias and cafés;
- (4.) County-leased properties; and
- (5.) Custodial populations.

The standards have been divided into two major sections. Section 1 includes four subsections (1A, 1B, 1C and 1D) and applies to food and beverages provided to the public and/or to Santa Clara County employees. Section 2 applies only to the County's custodial populations which include: clients, inmates, and patients.

Implementation Process

Santa Clara County's Nutrition Standards will be phased in at the start of the new fiscal year, July 1, 2012 which will allow time for internal notifications and education, trainings, and transitioning the procurement systems to make available additional healthier beverage and food options. The meetings and events standards, in which County funds are used, will be "recommended" for the first year and "required" thereafter. Another gradual transition will include use of lower sodium food items. Until these products become more readily available, and at a price point that is competitive with similar food products, the custodial populations will be encouraged to use less processed foods whenever feasible and use healthy preparation and cooking techniques to minimize the overall sodium content of the food served. The County's step-wise reduction will follow and align with the recommendations made by the National Salt Reduction Initiative (NSRI), which has set 2012 and 2014 sodium reduction goals. The County will follow a similar transition plan to continue to work to reduce the sodium content of foods served in the custodial settings while working to keep costs down.

The general implementation process will include the following steps:

- A memo from Office of the County Executive will be sent to all Department Directors to announce the new County Nutrition Standards including the implementation timelines. This memo will request that each department director, or their designee, will (1) update their organization's employees on the new standards and share information on training opportunities, and will (2) ensure the implementation within their respective department.
- Facilities and Fleet Department (FAF) will add nutrition standards and educational materials to the County's intranet site, "Planning an Event" to assist staff when they are planning/coordinating a meeting or event.
- In collaboration and coordination with the Facilities and Fleet Department (FAF), the Public Health Department will provide outreach and training to facility managers on how to implement the County Nutrition Standards (Meetings & Events, Vending Machines, and Cafeterias and Cafés) in each of their respective facilities. As part of the trainings, facility managers will be informed that they will be responsible for monitoring the operations and to notify FAF if concerns are identified.
- The Public Health Department will promote, offer, and provide trainings, designed specifically for department staffs involved in the procurement and event coordination tasks for their respective programs/departments, on how to comply with the new County Nutrition Standards. These trainings will provide general information on proper hand washing and basic tips on how to handle food safely.
- The Public Health Department will coordinate a comprehensive nutrition education and social marketing campaign that will include production and distribution of educational materials, posters/signage placed in County facilities, and articles placed in the available communication channels to educate employees and the public on the County's Nutrition Standards.
- The Procurement Department will update its procurement procedures to ensure that all County solicitations for food and beverage contracts/vendors include the County Nutrition Standards to make certain that food and beverages purchased with County funds comply with these standards.
- The Finance Agency will update the countywide travel policy to include language that when purchasing food as part of per diem employee travel, departments should encourage employees to be aware of healthier food options and select these healthier options whenever possible. Departments will inform their staff of the new policy language.
- The Office of the County Executive will update the Board's corporate sponsorship and marketing policy (3.46).
- The Nutrition Standards will be included in the Board Policy Manual.

- The Public Health Department will utilize tools developed by Communities Putting Prevention to Work - Obesity Prevention Initiative to evaluate the County Nutrition Standards implementation process and identify any revisions needed, one year after implementation begins. The evaluation will be completed in four of the five food environments. The County Nutrition Standards Committee will reconvene to assist with this evaluation process and report development.

1

Standards that Apply to Employees and the General Public

1A

Meetings and Events Standards

Standards that apply to all County meetings and events regardless of funding source:

- Ethnic/cultural customs should be honored by encouraging lighter versions of traditional foods that are provided as meals or snacks.
- Safe food handling procedures should be practiced consistently throughout the preparation, storage, distribution and service of foods and beverages. This includes obtaining food from a safe source, the use of proper hygienic practices, contamination prevention, and maintaining proper temperatures.
- When purchasing food as part of per diem employee travel, departments should strongly encourage employees to be aware of healthier food options and select healthier options whenever possible.
- For guidance on types of food items that meet the nutrition standards refer to the Appendix.

When County funds are used to purchase beverages and food:

- No sugar-sweetened beverages shall be served. This supports the County Beverage Nutritional Criteria that was adopted by the Board in October 2008. According to this Board policy, County dollars cannot be used to purchase sugar-sweetened beverages, either by County programs and/or contractors. This includes beverages that are served free of charge to individuals and groups participating in a County department or program (unless exempted by the Board policy).
- Food and beverages that are purchased must comply with the standards as outlined below. This applies to all food and beverages that are procured through catering services, restaurants, and grocery outlet purchases as well as to the procurement of pre-packaged snack food items.

Beverage Standards:

- No sugar-sweetened beverages shall be served.
- Water should be available or accessible for participants.
- Beverages should be served in bulk containers such as water pitchers whenever possible. This is consistent with two existing Board policies, the No Single Served Bottled Water Policy (adopted March 2008) and the Zero Waste Policy Events Policy (adopted May 2011).
- County organizations convening meetings/events should encourage participants to bring and use their own reusable water bottles, if possible.
- Beverages that Meet County Nutrition Standards:
 - Water, including carbonated water (no added caloric sweeteners);
 - Non-sweetened coffee or tea (if condiments are provided, sugar and sugar substitutes may be provided);
 - Plain (no added flavor or sugar) nonfat or 1% low fat dairy milk;
 - Plant derived milk (e.g. soy, rice, and almond) with ≤ 130 calories per 8 ounce serving;

- 100% fruit or vegetable juice (limited to a maximum of 8 ounce container);
- Low-calorie beverages (including tea and/or diet soda) that do not exceed 40 calories per 8 ounce serving.

Food Standards:

- Generally it is not recommended to offer food at meetings that do not take place during a usual meal time, are less than 3 hours long, and/or where food is not an incentive for meeting attendance.
- For mid-morning and mid-afternoon meetings, consider serving beverages only (refer to Beverages that Meet County Standards list in the section above).
- Healthier food options must be offered. Healthier options include the following (for additional examples of healthier food items, refer to Appendix):
 - Fruits, vegetables, whole grains, and low fat and low calorie foods, including low fat dairy, lean protein sources and lower fat versions of condiments (e.g. dressings, mayonnaise, cream cheese, and/or sour cream dips).
 - Minimally processed foods that are made or produced without added sugar and less sodium (look for products with recognizable ingredients on the label).
 - Foods that are prepared by healthy cooking techniques such as baking, roasting, broiling, grilling, poaching, steaming, or stir frying instead of pan frying or deep fat frying to minimize the amount of added fat to the foods prepared.
 - Foods that contain less than 0.5 grams of *trans* fat (these items are considered to be *trans* fat free).
- Larger items should be served in smaller portions [e.g. mini bagels (2 ½" diameter) or large bagels (4 ½" diameter) that are cut into halves or quarters; mini muffins (1 ¼" diameter) or other smaller versions of baked goods].
- Include a vegetarian option for all meals provided and consider a vegan option whenever possible.
- Offer seasonal and local produce, whenever possible.
- Serve fruit instead of sugary, high calorie desserts.
- Attempt to accommodate special dietary and cultural needs.
- Post nutritional information and/or list of ingredients for items served, whenever possible, as this information is helpful especially to those individuals with special dietary needs.
- If pre-packaged snack foods are provided, 100% of these snack food items must meet all of the following criteria:
 - No more than 35% calories from fat with the exception of items that contain 100% nuts or seeds; snack mixes that contain less than 100% nuts and seeds must meet the 35% of calories from fat requirement;
 - No more than 10% calories from saturated fat;
 - Zero *trans* fat;
 - No more than 35% total weight from sugar and caloric sweeteners with the exception of fruits and vegetables that have not been processed with added sweeteners and fats;
 - No more than 360 milligrams (mg) of sodium per package/container.
- For pre-package snack food items, it is recommended that items contain at least two (2) grams of dietary fiber per serving – this information can be found on the package’s Nutrition Facts Label and that low sodium options (FDA definition of “low sodium” or be ≤ 140 mg per serving) also be made available.

When no County funds are used to purchase beverages and food:

- When food and beverages are provided by an outside agency and served at a County venue or when food/beverages are donated by an outside agency to a County-sponsored meeting, event, and/or celebration, it is the responsibility of the sponsoring County department to request and encourage that the outside agency offer healthier choices.
- When food/beverages are provided by County employees for departmental staff meetings, trainings, and/or celebrations, employees are encouraged to provide healthier options. The nutrition standards are not directed at individuals' meals/snacks that are purchased and/or brought from home.

1B Food and Beverage Vending Machine Standards

These standards apply to County leased or operated vending machines.

Beverage Standards:

- **100% of the beverages available in each County leased vending machine will be one or a combination of the following:**
 - Water, including carbonated water (no added caloric sweeteners);
 - Non-sweetened coffee or tea (if condiments are provided, sugar and sugar substitutes may be provided);
 - Plain (no added flavor or sugar) non-fat or 1% low fat dairy milk;
 - Plant derived milk (e.g. soy, rice, and almond) with ≤ 130 calories per 8 ounce serving;
 - 100% fruit or vegetable juice (limited to a maximum of 8 ounce container);
 - Low-calorie* beverages (including unsweetened tea and/or diet soda) that do not exceed 40 calories per 8 ounce serving.

Food Standards:

- **100% of all snack foods in each County leased and operated vending machines will meet *all of the following* criteria:**
 - Contents of package/container must be a single serving size (*Nutrition Facts Label indicates Servings per Container: 1*);
 - No more than 35% calories from fat with the exception of packages that contain 100% nuts or seeds; snack mixes that contain less than 100% nuts and seeds must meet the 35% of calories from fat requirement;**
 - No more than 10% calories from saturated fat; **
 - Zero *trans* fat; **
 - No more than 35% total weight from sugar and caloric sweeteners with the exception of fruits and vegetables that have not been processed with added sweeteners and fats;***
 - No more than 360 milligrams (mg) of sodium per package/container. **

* The definition of "low calorie" is 40 kcal or less per Reference Amounts Customarily Consumed (RACC) and the RACC for beverages is 8 ounces), 21 CFR 101.60(b) per the U.S. Food and Drug Administration. *Guidance for Industry: A Labeling Guide for Restaurants and Other Retail Establishments Selling Away-From-Home Foods.*

** Consistent with Santa Clara County Vending Policy, 2005.

- **At least 10% of all snack foods** in each of the County leased and operated vending machines will contain at least two (2) grams of dietary fiber per serving – information found on the package’s Nutrition Facts Label.
- **At least one snack food item** in each of the County leased and operated vending machines will meet the FDA definition of “low sodium” or be ≤ 140 mg per serving.
- For more information on how to understand and use the Nutritional Facts Label go to the U.S. Food and Drug Administration (FDA) site at <http://www.fda.gov/Food/ResourcesForYou/Consumers/NFLPM/ucm274593.htm>

1C Cafeterias and Cafés Standards

These standards apply to the following:

- A. County-Operated Cafeterias**
- B. Valley Medical Center Operated Cafeteria, Café, and Kiosk**

The guidelines are designed to encourage private vendors and County departments that operate the cafeterias in County operated facilities to provide healthier beverages and food choices to their customers.

Beverage Standards:

- Operators are recommended to reduce (or eliminate) the availability of sugar-sweetened beverages. At least 50% of the beverage options available must be made up of one or more of the following:
 - Water, including carbonated water (no added caloric sweeteners);
 - Non-sweetened coffee or tea (if condiments are provided, sugar and sugar substitutes may be provided);
 - Plain (no added flavor or sugar) nonfat or 1% low fat dairy milk;
 - Plant derived milk (e.g. soy, rice, and almond) with ≤ 130 calories per 8 ounce serving;
 - 100% fruit or vegetable juice (limited to a maximum of 8 ounce container);
 - Low-calorie beverages (including tea and/or diet soda) that do not exceed 40 calories per 8 ounce serving.
- Healthier beverages should be placed prominently and be as easy to see as the operator’s other most popular beverages.

Food Standards:

- Operators are recommended to provide an assortment of healthier food choices, with lower amounts of fat, sugar, and sodium. To accomplish this operators are encouraged to:
 - Offer more fruits, vegetables, whole grains, and low fat and low calorie foods, including low fat dairy, lean protein sources and lower fat versions of condiments (e.g. dressings, mayonnaise, cream cheese, and/or sour cream dips);
 - Offer more minimally processed foods made or produced without added sugar and less sodium;
 - Prepare foods using healthy cooking techniques such as baking, roasting, broiling, grilling, poaching, steaming, or stir frying instead of pan frying or deep fat frying to minimize added fat to the food prepared;
 - Use foods that contain less than 0.5 grams of *trans* fat (this is considered to *trans* fat free);
 - Offer at least one vegetarian option on the menu;

- Offer seasonal and local produce, when possible;
- For foods that tend to be higher calorie, when served in typical food portions, make items available in smaller portions (e.g. mini muffins or cookies).
- **At least 50% of pre-packaged snack foods** sold in the cafeterias and cafés should meet the following criteria:
 - Contents of package/container must be a single serving size (*Nutrition Facts Label indicates Servings per Container: 1*);
 - No more than 35% calories from fat with the exception of packages that contain 100% nuts or seeds; snack mixes that contain less than 100% nuts and seeds must meet the 35% of calories from fat requirement;
 - No more than 10% calories from saturated fat;
 - Zero *trans* fat;
 - No more than 35% total weight from sugar and caloric sweeteners with the exception of fruits and vegetables that have not been processed with added sweeteners and fats;
 - No more than 360 milligrams (mg) of sodium per package/container.
- For pre-package snack food items, it is recommended that items contain at least two (2) grams of dietary fiber per serving – this information can be found on the package’s Nutrition Facts Label and that low sodium options (FDA definition of “low sodium” or be ≤ 140 mg per serving) also be made available.
- Healthier food items should be placed prominently and be as easy to see as the operator’s other most popular food items.

Mobile Vending

- Mobile vending was not included in these comprehensive County Nutrition Standards, but this is an additional food environment that will be added to these standards within the next year.
- A Request for Proposal (RFP) will be issued by the Facilities and Fleet (FAF) Department, in conjunction with the County Food Services Committee, to solicit and secure a Mobile Food Truck Vendor(s). The RFP process is expected to take eight (8) months from the initial drafting to the point of recommending vendor(s) to the Board of Supervisors (BOS).

1D Recommendations for County Properties Leased to or Operated by Private Entities Serving the Public

These recommendations apply to County land and facilities that are leased by private entities that run businesses, events and activities and are open to the public. This subsection excludes food services intended primarily for County employees. Examples include such circumstances as the following:

- *Twin Creeks Sports Complex*: Global Sports Inc. has built a recreational softball complex on land that it leases from the County. The facility serves food to the public in a restaurant/clubhouse.
- *Santa Clara County Fairgrounds*: The Fairgrounds Management Corporation, Inc. (FMC) and the County have entered into an operating agreement whereby the nonprofit corporation FMC is responsible for managing operation of the County Fairgrounds, including organizing and holding the Annual County Fair and managing an event rental program for public use of the facilities year round. FMC contracts with a food service provider (caterer) to operate a restaurant and provide food service on-site. This caterer is available to private parties that rent event space at the Fairgrounds. In some situations, private parties

rent use of buildings at the Fairgrounds for private parties (e.g. picnics, birthday parties, etc.) and provide their own food.

- *Santa Teresa Golf Course and Spring Valley Golf Course* are leased facilities operated by private partnerships on County-owned Property. Each includes a restaurant and banquet facility serving food to the public.
- *Coyote Ranch* is a lease of County property where a private entity operates a picnic and corporate event concession serving food for group events held on the site.
- *Via Rehabilitation Services, Inc.* is a non-profit organization operating a residential camp for children and adults with disabilities on leased County property including cafeteria style food service for campers at the facility.
- *Baylands Quarter Midget Racing Association* is a non-profit group operating a youth training and racing facility for quarter midget race cars that include a snack bar type food service on-site for race/training participants.
- The newly renovated *Casa Grande* facility is to be operated by Parks as a picnic/wedding/event venue where groups renting the space will have the option of using approved caterers to be selected through a future RFP or to self-cater/use a caterer not on the list, for an additional fee.

The intent of these nutrition guidelines is to provide recommendations that encourage private vendors who operate businesses on leased County property to provide healthier food and beverage choices to the public. The guidelines are designed to provide the opportunity for, and to encourage healthier choices, but not to regulate individual behavior. Operators are encouraged to serve/sell only those beverages and foods that meet the nutrition standards; however they are required to offer at least one healthier beverage *and* one healthier food option on their menu.

When leases come up for renewal on County owned lands, the County intends to incorporate recommended nutrition standards as a new lease provision. Under such standards, lessees would be encouraged to serve/sell only those beverages and foods from the recommendations below and from examples found in the Appendix; however they would only be required to ensure that there is always a healthier beverage *and* food option readily available on its menu. At events, such as the County Fair, the requirement would not necessarily be met by each vendor, but rather by the operator organizing the event and the selection of the mix of food vendors.

Beverage Recommendations:

- Operators are recommended to reduce (or eliminate) the availability of sugar-sweetened beverages.
- Recommended beverages include:
 - Water, including carbonated water (no added caloric sweeteners);
 - Non-sweetened coffee or tea (if condiments are provided, sugar and sugar substitutes may be provided);
 - Plain (no added flavor or sugar) nonfat or 1% low fat dairy milk;
 - Plant derived milk (e.g. soy, rice, and almond) with ≤ 130 calories per 8 ounce serving;
 - 100% fruit or vegetable juice (limited to a maximum of 8 ounce container);
 - Low-calorie beverages (including tea and/or diet soda) that do not exceed 40 calories per 8 ounce serving.
- Healthier beverages should be placed prominently and be as easy to see as the vendor's most popular beverages.

Food Recommendations:

- Operators are encouraged to offer healthier food choices, with lower amounts of fat, sugar, and sodium. To accomplish this operators are encouraged to:

- Offer more fruits, vegetables, whole grains, and low fat and low calorie foods, including low fat dairy, lean protein sources and lower fat versions of condiments (e.g. dressings, mayonnaise, cream cheese, and/or sour cream dips);
 - Offer more minimally processed foods made or produced without added sugar and less sodium;
 - Prepare foods using healthy cooking techniques such as baking, roasting, broiling, grilling, poaching, steaming, or stir frying instead of pan frying or deep fat frying to minimize added fat to the food prepared;
 - Use foods that contain less than 0.5 grams of *trans* fat (this is considered to *trans* fat free);
 - Offer a vegetarian option;
 - Offer seasonal and local produce, when possible;
 - For foods that tend to be higher calorie, when served in typical food portions, make items available in smaller portions.
- Healthier food items should be placed prominently and be as easy to see as the operator’s other most popular food items.

2

Standards for Custodial Populations

These standards apply to County organizations that supervise and care for clients and/or provide services and supplies to specific groups or populations. For the purposes of these nutrition standards, the custodial population includes clients, inmates, and patients provided meals from the following departments/agencies:

- A. Department of Correction (DOC);**
- B. Probation Department;**
- C. Santa Clara Valley Medical Center (SCVMC); and**
- D. Social Services Agency – Senior Nutrition Program.**

Each of the custodial populations adheres to specific mandates. The Department of Correction complies with Title 15, the Probation Department complies with Title 15, Juvenile Title 15, and both the National School Lunch Program and School Breakfast Program guidelines, and the Santa Clara Valley Medical Center and Social Services Agency - Senior Nutrition Program each comply with the applicable sections of Title 22.

Required Beverage Standards:

- When beverages are donated, County beverage standards *must* be met.
- 100% of the beverages available to custodial populations must be made up of one or more of the following:
 - Water, including carbonated water (no added caloric sweeteners);
 - Non-sweetened coffee or tea (if condiments are provided, sugar and sugar substitutes may be provided);
 - Plain (no added flavor or sugar) nonfat or 1% low fat dairy milk*;
 - Plant derived milk (e.g. soy, rice, and almond) with ≤ 130 calories per 8 ounce serving;
 - 100% fruit or vegetable juice (limited to a maximum of 8 ounce container);
 - Low-calorie beverages (including tea and/or diet soda) that do not exceed 40 calories per 8 ounce serving.

*2% low fat milk may be used for the Social Services Agency - Senior Nutritional Program

Food Standards:

- Provide more fruits, vegetables, whole grains, and non-fat or low fat dairy products.
- Minimize the use of processed foods that contains added sugar and sodium.
- Reduce the overall fat content by using healthy cooking techniques such as: baking, roasting, broiling, grilling, poaching, steaming and stir frying instead of pan frying or deep fat frying which can minimize the added fat to prepared food items.
- If higher calorie foods are provided, serve items in smaller portions (e.g. mini muffins or baked goods) while still maintaining overall calorie and nutrient requirements.
- Use low sodium items wherever possible assuming cost neutrality.
- Work toward incrementally reducing the overall sodium content. Reduce content of existing products through adding less salt during cooking/baking process; using low sodium bases when preparing soups, sauces, gravies; and rinse food items that are packaged with sodium as a preservative (e.g. beans or tuna).
- Ethnic/cultural customs should be honored by using healthier versions of traditional food items.
- When foods are donated, whenever feasible, accept only minimally processed donated foods that are made or produced without added sugar and with less sodium.

Custodial Population Exceptions:

- **Patients Under Therapeutic Care**
Nutrition requirements consistent with established medical guidelines and diets for patients under therapeutic care replace the general guidelines described within these standards. The Patient Bill of Rights allows patients under therapeutic care to request specific food items. These items are considered part of the therapeutic diet and do not need to meet the nutrition standards.
- **Food for Disaster Response**
Food purchased by agencies or received as donations to serve solely for a disaster or crisis response are not restricted by the nutrition criteria included here, recognizing such stocks intentionally include nutrient dense food products. These foods require periodic rotation and may be intermittently utilized to serve custodial populations to avoid waste.

County agencies that provide meals as part of state or federally-funded programs must adhere to their funders' requirements. These nutrient requirements differ by the type of agency and the age and gender of the population served. Three of the agencies identified above are required, as a condition of their funding, to complete a nutrient analysis of their menus. Although SCVMC is not required to complete a nutrient analysis of their menus, they have done so on a voluntary basis. Specific nutrient requirements for both adults and children (various age ranges) found in the Appendix.

Agencies must ensure that the food items procured, including pre-package items, follow the additional County Nutrient and Food Category Standards found in the Appendix. Most of these requirements exceed the currently mandated requirements.

The immediate changes as a result of this policy, which are above and beyond existing mandates, include the following:

- No soda will be served.
- No flavored milk will be served.
- Unflavored 1% low fat or non-fat dairy milk will be used except in the Social Services Agency - Senior Nutrition Program which will allow option of 2% low fat milk.
- No canned fruit in heavy syrup will be used.
- No deep fat frying will be allowed. Extremely limited use of flash fried items will be permitted to keep overall food costs down.
- Organizations will work to reduce overall sodium content through preparation and cooking processes.

- The Department of Correction (DOC) Inmate Commissary Fund (inmate purchases), which generates funds for inmate educational programming, will work closely with its vendors to add healthier items to the current list of food and beverages. DOC will gradually work towards a list of healthier options that will reach 10% of the items offered, with a goal of increasing this percentage as much and as rapidly as is practical.
- Department of Correction shall offer healthier meal combinations/choices on a daily basis in the Officer Dining Room and post the suggested serving sizes and calorie content on signs in the area where the food is served.

The intermediate changes, to be made over the next several years will include the following:

- Reduce the overall sodium content of food items served. The County's step-wise reduction will align with the recommendations made by the National Salt Reduction Initiative (NSRI), which has set 2012 and 2014 for sodium reduction goals. This will impact the varieties of breads, baked goods, cereals, preserved meats, canned and frozen products, as well as pre-packaged snack food items.
- Increase the healthier options through the Department of Correction (DOC) Inmate Commissary Fund to 25% of the items offered.

Appendix

Appendix – Prepared Foods

Below are prepared food items obtained through catering services, restaurants, and grocery outlet purchases that are recommended and meet the County Nutrition Standards. These lists are not all inclusive but are intended to provide general guidance on the types of food items that would meet the standards.

SERVE THESE ITEMS – Meet County Nutrition Standards

Breakfast Menu Items	Lunch, Boxed Lunch, and Dinner Menu Items	Snack Items
Fresh fruit, whole or sliced such as berries, melon, pineapple, grapes, apples, kiwi, bananas	Fruits and vegetables, including fruit and vegetable salads with low fat dressings that are served on the side	Fruit, whole or sliced such as berries, melon, pineapple, grapes, apples, kiwi, bananas
Low fat or nonfat yogurt or cottage cheese; hard boiled eggs; scrambled eggs or omelet prepared without added fat	Whole grain breads, pasta, tortillas and flat bread; corn tortillas; brown rice	Low fat or nonfat yogurt, cheese sticks or cottage cheese
Fresh vegetables (steamed, grilled or roasted) such as baby carrots, cherry tomatoes, broccoli and cauliflower florets, mushrooms, bell peppers (these could be added to scrambled eggs or omelets made without added fat)	Lean protein such as skinless turkey or chicken, lean cuts of pork, beef, fish; tofu; beans/legumes; nut butters with no added fats or sugars	Vegetables, whole or sliced such as baby carrots, cherry tomatoes, broccoli and cauliflower florets, celery, bell pepper (raw, grilled or roasted)
Low sugar jam, preserves or fruits spreads; low fat or fat free cream cheese, part-skim ricotta, hummus	Platters of half-sandwiches or wraps made with soft lavash or whole wheat/vegetable tortillas cut into pieces	Low fat spreads and dips such as: hummus, olive tapenade, low fat or fat free cream cheese, and salsa
Whole grain, low sugar (< 6 grams sugar per serving) cereals served with nonfat, 1% or 2% low fat milk	Soups and sides dishes made with clear stock base, vegetables, beans and legumes	100% whole grain crackers, bread; air-popped popcorn (no added butter)
Mini muffins (1 ¼" diameter) or mini bagels (2 ½" diameter); large (commonly served portion) muffins and bagels that are halved or quartered	Dressings and condiments: mustard, oil & vinegar, salsa, low fat spreads and dressings made with healthier oils (e.g. olive, vegetable or nut) and served on the side	Baked chips; rice cakes
100% whole grain crackers, bread, English muffins, waffles	Sushi made with fish, vegetables, tofu, and avocado	Dried fruit or dried fruit & nut trail mix that is pre-package or pre-portioned into 1 ounce individual servings and without candies or added sugar
Whole wheat pitas, tortillas, rice cakes	For boxed lunches – whole grain & lean protein or vegetable sandwich or entrée; side of fruit, vegetables or tossed salad	
Nut butters	Pasta dishes with low fat cheeses (part skim mozzarella, part skim ricotta); pasta served with tomato or other vegetable based sauce	
Dried fruit or dried fruit & nut trail mix that is pre-packaged or pre-portioned into 1 ounce individual servings and without candies or added sugar	Dessert - Fresh fruit, angel food cake, sorbet, frozen 100% fruit bar	

Appendix – Nutrient and Food Category Standards for Pre-Packaged Foods

These standards are defined per serving of food. The serving size is based upon Federal Drug Administration (FDA) established lists of Reference Amounts Customarily Consumed per Eating Occasion and is used on the Nutrition Facts Panel, unless otherwise noted. The FDA Reference Amounts Customarily Consumed per Eating Occasion can be accessed at: <http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?fr=101.12>.

Nutrients and Food Category Standards for Purchased Foods	Required	Recommended
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Nutrient Standards:

Trans Fat	All products purchased contain less than 0.5 grams (g) of <i>trans</i> fat per serving (<i>trans</i> fat free).	Purchase products that do not list “partially hydrogenated oils” under the ingredient list.
Sodium	All individual items have ≤ 480 milligrams (mg) sodium per serving, unless otherwise noted.	Purchase “low sodium” [140 milligrams (mg) or less sodium per serving] or “reduced sodium” [original sodium level reduced by 25%] whenever feasible.

Food Category Standards:

Food Products	No purchase of food products prepared by deep frying.	
Beverages	< 25 calories per 8 ounces for beverages other than 100% juice or low fat or non-fat milk.	
Canned fruits	Fruit canned in water, its own juice or light syrup. Do not purchase fruit canned in heavy syrup.	
Dairy	Milk must be 1% low-fat or non-fat.	Phase out flavored milk and flavored milk substitutes over time.
	Yogurt must be low-fat or non-fat.	Cheese that contains ≤ 215 milligrams (mg) sodium per serving. Cheese that is lower-fat alternative.
Bread, pasta, and other grains and starches	Bread and baked goods contain ≤ 215 milligrams (mg) sodium per serving.	Increase the proportion of whole-grain rich foods and decrease the amount of refined grain foods. Ideally, at least one half of all grains and breads prepared or purchased should be whole grain.
		Breads contain ≥ 2 grams (g) fiber per serving.
Cereal	Cereal contains ≤ 215 milligrams (mg) sodium per serving.	Cereal contains ≤ 6 grams (g) sugar per serving. Cereal contains ≥ 3 grams (g) fiber per serving
Canned vegetables	Canned vegetables contain ≤ 290 milligrams (mg) sodium per serving or have “no salt added”.	
Canned and frozen Tuna, salmon and other seafood	Canned and frozen seafood contain ≤ 290 milligrams (mg) sodium per serving or have “no salt added”.	
Canned meat	Canned meat contains ≤ 480 milligrams (mg) sodium per serving.	
Portion controlled items and other convenience foods	Individual items contain ≤ 480 milligrams (mg) sodium per serving.	
Frozen whole meals	Individual meals contain ≤ 800 milligrams (mg) sodium per meal.	
Condiments		Use low-fat mayonnaise; reduced sodium soy sauce; low-sodium ketchup; and low-fat, low-sodium, and low-calorie salad dressings (as per FDA definitions).
Meat	Bacon contains ≤ 290 milligrams (mg) sodium per serving.	Purchase “extra lean” beef and pork (total fat ≤ 5%) and at least 90% lean ground beef.
	Sausage contains ≤ 480 milligrams (mg) sodium per serving.	
Purchased fats		Purchase vegetable oils such as soft <i>trans</i> fat free margarine, olive, corn, and canola oils, rather than solid fats such as lard, butter, stick margarine, and shortening.

Appendix – Nutrient Requirements for Adults and Children

The County standards for the required nutrients for adults are based on USDA's 2010 Dietary Guidelines for Americans which can be accessed at:

<http://www.health.gov/dietaryguidelines/dga2010/DietaryGuidelines2010.pdf>

Nutrient Requirements for Adults (1)	
Nutrient	Requirements
Calories (2)	Female: 1,600-2,400 calories (kcal);
	Male: 2,000-3,000 calories (kcal)
Sodium (3)	< 2,300 milligrams (mg)
Sodium (> 51 years or African Americans of any age)	< 1,500 milligrams (mg)
Fat	20-35% of calories (kcal)
Saturated Fat	≤ 10 % of calories (kcal)
Fiber	Female: 22-28 grams (g); Male: 28-34 g
Protein	10-35% of calories (kcal)
Carbohydrate	45-65% of calories (kcal)
Cholesterol	< 300 milligrams (mg)
Potassium (4)	4,700 milligrams (mg)
Calcium (4)	1,000-1,200 milligrams (mg)
Iron (4)	Female: 8-18 milligrams (mg); Male: 8 mg

(1) Adult refers to individuals 19 to 51+ years of age.

(2) Based on ranges in activity level ranging from sedentary to active.

(3) Daily limit, regardless of total caloric intake.

(4) Recommended intakes potassium, calcium, and iron are proportional to total calories served.

Nutrient Requirements for Children
The County standards for the required nutrients for children, vary by age and gender, and are based on a variety of national standards. A complete table of these requirements can be found in Appendix 5 (Nutritional Goals for Age-Gender Groups, Based on Dietary Reference Intakes and Dietary Guidelines Recommendations) of the USDA's 2010 Dietary Guidelines for Americans which can be accessed at: http://www.health.gov/dietaryguidelines/dga2010/DietaryGuidelines2010.pdf .