



March 24, 2022

Tina Namian
Chief, School Programs Branch
Policy and Program Development Division, 4th Floor
Food and Nutrition Service
1320 Braddock Place
U.S. Department of Agriculture
Alexandria, VA 22314

Re: Child Nutrition Programs: Transitional Standards for Milk, Whole Grains, and Sodium, FNS-2020-0038-2936

Ms. Namian:

Thank you for the opportunity to comment on USDA's Transitional Standards for Milk, Whole Grains, and Sodium in the Child Nutrition Programs. The American Public Health Association (APHA) commends USDA for taking action to get the regulatory process back on track and to focus on the 2020–2025 Dietary Guidelines for Americans in order to inform healthy nutrition standards.

APHA represents 25,000 public health professionals working to improve the health of all people and communities for more than 140 years. From the public health perspective, strong nutritional standards for the school meals program are very important. While research shows that children receive their healthiest meals at school, there are still opportunities for improvement.

APHA supports the new healthier transitional nutrition standards as a short-term bridge to the planned more comprehensive revision. The new healthier transition standards will make much needed nutrition improvements including increasing whole grains and reducing sodium in school meals.

Moving forward, APHA endorses USDA's plan to collect input from parents and stakeholders and undertake a comprehensive revision of the standards to be implemented in school year 2024-2025. For the next rule, APHA recommends permanent comprehensive robust nutrition standards consistent with the Dietary Guidelines for Americans. The 2020-2025 Dietary Guidelines for Americans emphasize healthy meal patterns with nutrient-dense foods, like vegetables, fruits, lean meats, and whole grains, that are low in saturated fat, added sugar, and sodium.

Our comments and recommendations are organized into the following categories:

- I. Nutritious School Meals Help Students Thrive
- II. The Transition Standards Will Help Schools and Students
- III. Future Rule: Priorities for Strengthening the School Meal Nutrition Standards

Stronger Nutrition Standards Will Promote Equity

I

Improving the nutritional quality of children's diets is urgently needed. According to the 2020-2015 Dietary Guidelines for Americans (DGAs), school-age children and adolescents had the lowest dietary quality of any age group. Compared to a maximum Healthy Eating Index score of 100, children ages 5 to 8 had an average score of 55, adolescents ages 9 to 13 had an average score of 52, and adolescents 14 to 18 had an average score of 51. From 2017-2018, 41.5 percent of children ages 2 to 19 were overweight or obese, with higher rates among children who are Latino, Black, live in rural areas, and have parents with less than a college degree. Since the beginning of the pandemic, the rate of increase in obesity has accelerated, particularly for Black and Latino children, exacerbating disparities.

Poor nutrition does not only impact obesity rates. Children with food insecurity and/or poor nutrition tend to have poor nutrition later in life, increased rates of overweight and obesity, and higher risk of other poor health outcomes like cardiovascular disease and mental health problems. In addition to healthy physical growth and development, nutrition is also critical for children's ability to do well in school and psychological growth. Food insecurity in particular leads to poor performance in school, and hinders social and emotional development.

Nutritious food, therefore, is necessary in order for children to have a quality education and become healthy, thriving adults. School meals fuel children's health and learning by reducing hunger, decreasing childhood obesity, improving child nutrition, and enhancing child development and school readiness. Extensive research has linked participation in school meals to a number of benefits:

- improving academic achievement, standardized test scores, and cognitive function;

on the school nutrition environment as well as student food selection and consumption, especially for fruits and vegetables.

standards on a timeline should allow schools to plan, source, and test meals that are nutritious, palatable to students and abide by new guidelines.

The 2020 DGAs recommend limiting sodium to 1,500 mg/day for children ages 4 through 8, 1,800 mg/day for ages 9 through 12, and 2,300 mg/day for adolescents 14-18. Average consumption of sodium far exceeds these recommendations (see *Table 2*).

▼ Sodium intake among school-age children exceeds recommended limits from the Dietary Guidelines for Americans 2020-2025

Age Group	Recommended Daily Limit, mg/day	Percent Exceeding Recommendation*	Average intake,* mg/day
4-8 years old	1,500	97%	2,500 – 2,800
9-13 years old	1,800	96 - 97%	3,000 – 3,500
14-18 years old	2,300	77 - 97%	2,900 – 3,900

Note: Calculations are from the 2020-2025 DGAs using data from What We Eat in America, NHANES 2015-2016

*A range is presented for average intake to reflect different consumption between males and females. Females have

Average intake is [below dietary recommendations](#) for children ages 6 to 11 and adolescents ages 12 to 19 (less than 1 cup per day). In addition, white potatoes are the most common type of vegetable consumed, while the intake of dark green and red and orange vegetables is quite low.

Average intake is [below dietary recommendations](#) for children ages 6 to 11 and adolescents ages 12 to 19 (less than 1 cup per day). Two-thirds of fruit consumption is whole fruit.

APHA recommends returning to a whole grain standard that requires at least half of all grains in school meals to be whole grain, consistent with the 2020 DGAs. This could be accomplished by returning to the HHFKA standard of 100 percent whole grain-rich foods, where grain-rich foods are required to be at least 50 percent whole grain. Whole grain intake has increased among children from 2003 to 2016 but remains below recommended intake levels. USDA should provide technical assistance to school districts to meet whole grain standards with palatable and culturally appropriate foods.

USDA should encourage evidence-based strategies to improve the consumption of fruit and vegetables in the school meals programs. While participants in school lunch are more likely to consume vegetables, fruit or 100 percent fruit juices, and whole grain-rich foods, daily consumption, as indicated above, is still below recommendations.

In school meals, a higher percentage of vegetables are wasted (31 percent) compared to other food groups. A high percent of fruit and 100 percent fruit juice are also wasted (26 percent).

Strategies to increase consumption include:

- o **y** . Higher quality food is likely to be more attractive to students, especially with fresh fruits and vegetables, which may have more variability in product quality. In addition, a recent systematic review has shown that, across different

- o Allowing school children to have recess before lunch and allowing them enough time to eat are both important evidence-based strategies that can support a significant increase in healthy food consumption.

APHA recommends revising the school “smart snack” rules to reflect the sugar limit in the school meals. It will be counter-productive to allow sugary foods sold in school cafeterias and vending machines to compete with healthier school meals. Different nutritional standards in the school food environment send conflicting signals to students about nutrition and health. The “smart snack” rules have been effective in improving dietary intake in schools but they need to be updated to be consistent with the Dietary Guidelines for Americans and the availability of “added sugar” on labels.

Continuing to improve the competitive foods “smart snack” rules is important to all children throughout America. It is especially important to the well-being of children from families earning low incomes who disproportionately benefit from the free and reduced-price meals and snacks offered in school through the federal programs. Peer pressure and stigma can drive these students to purchase less healthy competitive foods with scarce funds instead of eating healthy school meals. Children from families with low incomes have more at risk nutritionally and economically than their more affluent peers.

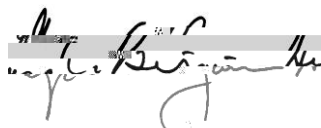
Strong nutrition standards for school meals are an important component in addressing continued disparities in child nutrition and health. They are an important tool for “increasing healthy options,” one of the four pillars of the Getting to Equity framework, a public health tool for ensuring that policy is designed and implemented with explicit attention to reducing disparities. This framework was recently applied to the distribution of emergency school meals early in the pandemic, a useful case study for thinking about how school meal nutrition and access policies should be structured to maximize equitable impacts.

School nutrition standards are also important tools for addressing disparities in educational attainment and academic performance. A 2020 Robert Wood Johnson-funded Health Impact Assessment of earlier proposed rollbacks to school nutrition standards highlighted the negative impact on the health and learning of students from low-income households, those attending school in predominantly Black or Hispanic neighborhoods and those in rural areas would be most likely to be adversely impacted. Therefore, access to nutritious school meals impacts disparities in educational attainment and academic performance that exist among these populations. Inequities in education can negatively influence children’s future access to employment, stable housing, healthy food and safe recreational spaces as well as healthcare utilization, all factors which can influence future well-being.

School meals play an important role in alleviating food insecurity and poverty, and in providing the nutrients students need for growth, development, learning, and overall health, especially for the nation’s most vulnerable children and adolescents.

School meals are already the healthiest source of food in the US, but there is room for improvement. The bridge rule makes important nutrition improvements while maintaining some continuity for schools over the next two school years as they continue to adapt to disruptions caused by COVID-19 and supply chain constraints. Permanent revisions to the nutrition standards should align with the latest nutrition science and dietary guidance set by the 2020-2025 DGAs. In particular, added sugars should be limited to 10 percent of calories from school meals over the course of a week. Finally, these standards should be accompanied by technical assistance and policies that increase access to school meals so that students can take full advantage of the nutritious meals being offered.

Sincerely,

A handwritten signature in black ink, appearing to read "Georges C. Benjamin". The signature is written over a grey rectangular redaction box. Below the signature is a short horizontal line.

Georges C. Benjamin, MD
Executive Director