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Submitted via www.regulations.gov

May 3, 2023

Secretary Thomas Vilsack
U.S. Department of Agriculture
1400 Independence Avenue,
S.W. Washington, DC 20250

Re: USDA Docket No. FNS 2022-0043-0001, “Child Nutrition Programs: Revisions to Meal Patterns Consistent with the 2020 DGAs”

Dear Secretary Vilsack,

On behalf of First Focus on Children, thank you for the opportunity to comment on the proposed rule concerning Revisions to Meal Patterns Consistent with the 2020 Daily Guidelines for Americans (DGAs). First Focus on Children is a bipartisan children’s advocacy organization dedicated to ensuring children and families are a priority in federal policy and budget decisions. We commend the U.S. Department of Agriculture’s (USDA) for putting children’s health and well being at the forefront of their policy making. Under the proposed rule, USDA is thoughtfully advancing its commitment to ensuring children receive the nutrition they need to thrive in school and beyond. We further applaud USDA for structuring this rule to provide schools with adequate lead time to adopt the new standards.

Students consume up to 50% of their daily calories at school, and research shows that updated school meal standards significantly raise the quality of their meals.¹ After USDA updated standards in 2012, research found that the nutritional quality of school meals increased by 41%.² Science shows that children’s nutrition is directly linked with healthy development and a healthy diet reduces a child’s risk of obesity, diabetes, and developing chronic conditions like heart disease, tooth decay, high blood pressure, and cancer later in life.³ Meal patterns that follow USDA dietary recommendations are proven to work, and the 2012 updated standards increased fruit, vegetable, and whole grain consumption.⁴

¹ “School Nutrition Environment.” Centers for Disease Control and Prevention. 2019. <https://www.cdc.gov/healthyschools/nutrition/schoolnutrition.htm>.

² “State of Childhood Obesity.” United States Department of Agriculture. January 18, 2023. https://stateofchildhoodobesity.org/wp-content/uploads/2023/01/SNMCS_Summary-Findings.pdf.

³ “Childhood Nutrition Facts.” Centers for Disease Control and Prevention. August 5, 2022. <https://www.cdc.gov/healthyschools/nutrition/facts.htm>.

⁴ Datz, Todd. “New School Meal Standards Significantly Increase Fruit, Vegetable Consumption. March 4, 2014. <https://www.hsph.harvard.edu/news/press-releases/school-meal-standards-increase-fruit-and-vegetable-consumption/>.

Every five years, the USDA, in partnership with the Department of Health and Human Services (HHS), updates the *Dietary Guidelines for Americans (DGAs)*.⁵ These recommendations serve as guidelines for a healthy diet and lifestyle to promote health and prevent disease. The proposed school meal standards deliver school meals to students that align with the science proven to give them a healthy start. Since the last update, nutrition science has even more firmly established the interrelationship between nutrition, brain health, the immune system and disease. USDA's proposed update reflects this science and the growing understanding that the meals students receive at school are free from the overabundance of sodium, added sugar and saturated fat that is typical of the Standard American Diet (SAD).

Healthy school meals can be a lifeline to a nutritious diet for low-income children. Studies show that students from low-income households who rely on school meals for breakfast and lunch have a significantly healthier diet than those who do not.⁶ Students who are eligible for free or reduced-price school lunches but instead bring meals and snacks from home consume significantly more saturated fat and sugar and significantly less fruit than their NSPL-participating counterparts.⁷ USDA's proposal will only further ensure that school based meals reflect what is most appropriate for children's health and development..

Added Sugars

First Focus strongly supports USDA's decision to introduce a limit on added sugars. We believe USDA is taking a balanced and practical approach by phasing in these limits, beginning with limits on sugar for breakfast cereals and yogurt and limits on grain-based desserts, and phasing in a limit on the total amount of added sugar in all meals and snacks.

Multiple studies have clearly established that high sugar consumption leads to a host of childhood diseases from obesity to tooth decay to diabetes and ultimately, contributes to chronic health challenges from cardiovascular disease to cancer.⁸ Equally important, sugar has been shown to affect a child's brain health, affecting academic performance, learning and memory.

While the updated DGAs recommend that no more than 10% of a child's calorie intake comes from added sugar, 70-80% of children exceed their recommended limit daily.⁹ Therefore, we strongly support and believe USDA's proposed approach to institute a limit on added sugar in school meals is critical

Milk

Low-fat and fat-free milk provides vital nutrients like vitamin D and calcium that are essential for healthy development and growth.¹⁰ Current federal standards allow for both flavored and unflavored low-fat or fat-free milk. Research shows that flavored skim milk is the highest source of added sugar in school meals, accounting for 47% of all added sugars in school lunches.¹¹

⁵ "Dietary Guidelines for Americans, 2020-2025." U.S. Department of Agriculture and U.S. Department of Health and Human Services. December 2020. https://www.dietaryguidelines.gov/sites/default/files/2021-03/Dietary_Guidelines_for_Americans-2020-2025.pdf.

⁶ Gearan, Elizabeth C., Monzella, Kelley, Jennings, Leah, and Fox, Mary Kay. "Differences in Diet Quality between School Lunch Participants and Nonparticipants in the United States by Income and Race." *Nutrients*, Vol 12(12). December 2020. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7765856/>.

⁷ Vernarelli, Jacqueline A., O'Brien, Brady. "A Vote for School Lunches: School Lunches Provide Superior Nutrient Quality than Lunches Obtained from Other Sources in a Nationally Representative Sample of US Children." *Nutrients*, Vol 9(9). August 24, 2017. <https://pubmed.ncbi.nlm.nih.gov/28837090/>.

⁸ Vos, Miriam B. et al. "Added Sugars and Cardiovascular Disease Risk in Children." *Circulation*, Vol 135(19). <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5365373/>

⁹ "Dietary Guidelines for Americans, 2020-2025."

¹⁰ "Cow's Milk and Milk Alternatives." Centers for Disease Control and Prevention. Last accessed March 30, 2023. <https://www.cdc.gov/nutrition/infantandtoddlernutrition/foods-and-drinks/cows-milk-and-milk-alternatives.html>

¹¹ Fox, Mary Kay, Gearan, Elizabeth C., Schwartz, Colin. "Added Sugars in School Meals and the Diets of School-Age Children." *Nutrients*, Vol 12(2). <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7911531/>

USDA has laid out two alternatives for how schools could implement the new milk standards. Of the two options proposed, First Focus supports Alternative B as the new standard on milk. Alternative B allows all students access to flavored and unflavored milk, so long as it meets the new proposed added sugar limits. This option encourages students to get the nutrients they need from milk by providing appealing options while still limiting overall sugar consumption. While more improvement is needed, we commend the USDA for taking this important step.

Sodium

Most children between the ages 2-19 consume double the sodium recommended by the American Heart Association.¹² Children with high-sodium diets are 40% more likely to experience high blood pressure, which can contribute to early-onset heart disease, obesity, and hypertension in adulthood.¹³

First Focus supports the USDA's proposed plan to gradually reduce sodium by 30% over several years, beginning in 2025. The current standards consist of varying weekly limits based on school grade and age groups but are not stringent enough to help children meet the current DGAs. Limiting and gradually reducing sodium intake at a young age helps children's taste preferences develop towards lower-sodium foods, helping them to create healthier eating habits for a lifetime.

While we commend the USDA for taking steps to reduce children's sodium, we urge them to consider a more accelerated timeline. We appreciate that the food industry will need time to adjust, all children, including those in school now, deserve healthier choices at school meals. We urge the USDA to continue all of its efforts to reduce sodium intake.

Whole Grains

Before the pandemic, regulations required only 50% of the weekly grains offered in school meals be whole grain-rich, meaning that a product must contain at least 50% whole grains. Last year, in a transitional guidance, USDA required that the weekly grains offered in school meals be 80% whole grain-rich.

Whole grains offer widely recognized health benefits, but consumption levels are well below recommended, especially among children.¹⁴ Whole grains are more nutrient dense and have been shown to reduce the risk of heart disease.¹⁵ The high amount of fiber in whole grains makes a person feel fuller for longer, which in turn can help reduce overeating and ultimately help with weight management. Under the current standard, 93% of children do not meet their daily recommended whole grain intake.¹⁶

First Focus supports the first of the two proposed options, which maintains the current 80% whole grain-rich requirement. This option allows flexibility for students as they transition to a whole-grain rich diet while still ensuring that they are able to enjoy whole-grain foods daily. The alternative, which allows schools to offer enriched grains one day per week and requires all other grains be whole-grain rich, may be burdensome for schools and discourage routine healthy habits.

Conclusion

Thank you for the opportunity to submit comments to this proposed rule. First Focus on Children strongly supports the proposed revisions to the school meal patterns. We believe USDA's approach is both scientifically

¹² "Sodium and Kids." American Heart Association. December 2, 2022. <https://www.heart.org/en/healthy-living/healthy-eating/eat-smart/sodium/sodium-and-kids>

¹³ Ibid.

¹⁴ Meynier, Alexandra, Chanson-Rollé, Aurélie, Riou, Elisabeth. "Main Factors Influencing Whole Grain Consumption in Children and Adults—A Narrative Review." *Nutrients*, Vol 12(8). July 25, 2020. <https://www.mdpi.com/2072-6643/12/8/2217>

¹⁵ Ibid.

¹⁶ "Food Patterns Equivalent Intakes from Food: Consumed per Individual." United States Department of Agriculture. January 6, 2021. <https://www.ars.usda.gov/northeast-area/beltsville-md-bhnrc/beltsville-human-nutrition-research-center/food-surveys-research-group/docs/fped-data-tables/>

sound and practical, giving schools time to implement the new standards while also prioritizing the health of America's children. Given the extensive implications of a poor diet on a child's health and development, it is imperative that the meals children receive at school help our students create healthy, life-long habits and provide the nutrients they need to grow and thrive. We look forward to working with the USDA on supporting the implementation of this rule.

Sincerely,

A handwritten signature in blue ink that reads "Bruce Lesley". The signature is written in a cursive style with a large, prominent "L" in "Lesley".

Bruce Lesley
President, First Focus on Children