

Submitted via www.regulations.gov

May 9, 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 the Child & Student Nutrition Alliance (CSNA) and the undersigned organizations prioritizing children’s health, 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). CSNA is a coalition of organizations dedicated to elevating the importance and urgency of a robust federal investment in the highest quality nutritional standards and fully funded programs to eliminate children and student hunger. We commend the U.S. Department of Agriculture’s (USDA) commitment to ensuring children receive the nutrition they need to thrive in school and beyond.

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, 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

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

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/>.

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.

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 a growing and firmly recognized need to ensure that the meals students receive at school are free from the overabundance of sodium, added sugar and saturated fat that is typical of the US food supply.

Notably, 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 continue to provide these children with the nutritious meals that they may not have access to at home.

Thank you for the opportunity to submit comments to this proposed rule. The Child & Student Nutrition Alliance strongly supports the proposed revisions to the school meal patterns. We believe USDA's approach is both scientifically 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,

American Psychological Association
Beyond Our Walls, Inc.
Children's Advocacy Institute
First Focus on Children
March of Dimes
MomsRising
National Association of Councils on Developmental Disabilities
National Association of Pediatric Nurse Practitioners
National League for Nursing
Philanthropy Ohio
Society for Nutrition Education and Behavior
The Education Trust

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/>.