

Tina Namian  
Chief, School Programs Branch  
Policy and Program Development Division  
USDA, Food and Nutrition Service

RE: Docket No. FNS-2019-0007

To Ms. Namian:

I write to express my strong opposition to the damaging nutrition proposals in USDA's proposed rule "Simplifying Meal Service and Monitoring Requirements in the National School Lunch and School Breakfast Programs" and to offer my recommendations.

The rule would roll back important aspects of the current school meal nutrition standards and significantly unravel the progress made under the Healthy, Hunger-Free Kids Act of 2010. Healthy school meals help combat childhood obesity and improve overall health, particularly for low-income children. USDA's own research, as well as other research, shows that school meals have improved children's diet and health. Now is not the time for a rollback.

The proposed rule would weaken nutrition standards, eliminate the guarantee that all children will receive a balanced and healthy school meal regardless of school setting, and diminish the nutritional value of other foods sold in the cafeteria.

I strongly support maintaining the current evidence-based school nutrition standards to assure that all children have access to foods that support their health, well-being, and learning, irrespective of the school they attend.

**Recommendations regarding the proposed rules:**

- **All children eating a school breakfast should continue to receive the current required one cup of fruit regardless of the setting.** Do not reduce the amount of fruit required in breakfast from 1 cup to 1/2 cup in settings outside the cafeteria. One cup of fruit is an evidence-based standard consistent with the Dietary Guidelines for Americans. Children's dietary requirements remain the same regardless of the location of the breakfast program.
- **Continue to guarantee that children receive a school meal with the variety of vegetables designed to provide a full array of much needed nutrients.** Do not reduce the amount of vegetables that must be served from the important and often under-consumed red and orange vegetables category, e.g., such as, tomatoes, carrots and squash) and the other vegetables category, which includes cucumbers, cauliflower, and avocados. Maintain the current regulatory requirements for the red/orange and other vegetable sub-categories. Reducing the requirement only paves the way for less variety, and potentially, more French fries.
- **Maintain current regulations requiring schools to offer meals that meet the nutritional requirements for the age/grade group of each student.** The final

rule should not allow “small” schools to have the option to only use one (or two) meal patterns for all the students in the school, regardless of the grade range of the students. The three grade groups, (Kindergarten-5th grade), (6th-8th grade), and (9th-12th grade), are science-based categories that are designed to meet the specific nutrition needs of the age range for that grade group. Under the proposed regulations, a school with students ranging from elementary to high school could serve all the students meals based on the meal pattern for elementary students (K-5), leaving the middle and high school students hungry and under-fed.

- **Protect the controls over the nutrition value of other food sold in the cafeteria, including a la carte entrees.** The smart snack nutrition rules protect the nutritional value of food sold separately from the federal school meals. The proposed regulation would create loopholes in the current nutrition standards to allow for more pizza, hamburgers, and other foods that are high in calories and saturated fat or sodium to be sold a la carte. Do not extend any smart snack exemptions.
- **Integrate nutrition safeguards into the proposed option to allow schools to offer a meat/meat alternate or a grain product at breakfast.** For this to be successful, USDA should reinstate the requirement for all grain products to be whole-grain rich, and institute controls on the calories and sodium in the meat/meat alternates served at breakfast.

#### **Response to USDA’s request for information on key questions:**

- Do not weaken the smart snack nutrition standards by exempting all food including “side dishes” sold separately in the cafeteria and/or weakening the whole--grain rich requirements.
- Do not drop the variety requirements for serving vegetables at breakfast.
- Do not allow grain-based desserts (e.g., cakes, cookies, and donuts) to be credible in the Child and Adult Care Food Program.

Thank you for the opportunity to provide comments.