

January 22, 2018

School Programs Branch
Policy and Program Development Division
Food and Nutrition Service
3101 Park Center Drive
Alexandria, Virginia 22302

Re: Docket No. FNS-2017-0021; Child Nutrition Programs: Flexibilities for Milk, Whole Grains, and Sodium Requirements

Dear Ms. Namian:

The California Food Policy Advocates respectfully submit comments in response to the U.S. Department of Agriculture's (USDA) "Child Nutrition Programs: Flexibilities for Milk, Whole Grains, and Sodium Requirements" interim final rule (IFR) (82 FR 56703), and oppose weakening school nutrition standards. CFPA is a statewide policy and advocacy organization dedicated to improving the health and well-being of low-income Californians by increasing their access to nutritious, affordable food. CFPA has worked to strengthen the federal nutrition programs for over 25 years by sponsoring state legislation, conducting research, and working with communities across California.

The new USDA nutrition standards for school meals are extraordinarily important for the health and academic success of California's school children. While all students can benefit from healthy school meals, they are particularly important to low-income students and those that struggle with hunger. In California, 2.3 million low-income children eat school lunch, and 1.2 million low-income children eat school breakfast, each day. Many of these students rely on school meals for adequate nutrition. Nutritious school meals improve nutrition shortfalls and help address the nation's obesity problem.

Research shows that the new, science-based nutrition standards have a positive impact on the school nutrition environment. There have been many successes as a result of the Healthy, Hunger-Free Kids Act (HHFKA) of 2010 which ushered in improved school meal nutrition standards.

- Kids eating more fruits and vegetables as a result of the improved HHFKA nutrition standards.
- Increased school lunch revenue. Nationwide, schools saw a net increase in revenue from school lunches of approximately \$200 million.
- Healthy food standards did not increase food waste. While plate waste is always concerning, the amount of waste was not increased since before the meal pattern changed.
- Participation increased substantially in many areas of the country. California's largest school district, Los Angeles Unified, saw a 14 percent increase in participation with the HHFKA meal standards.

- Virtually all schools continued to offer the federal school meal programs. Despite media reports of schools dropping out of as a result of HHFKA, 99.85% of schools continued to participate in the programs.¹

We are concerned about the proposed changes to the school nutrition standards, and strongly support maintaining the current, evidence-based school meal program standards to assure that all children have access to foods that support their health, wellbeing, and learning, irrespective of the school they attend.

School meals should be consistent with the Dietary Guidelines for Americans, including serving whole-grain foods and limiting sodium and saturated fat. This is especially important because most American children do not consume enough fiber and whole grains, and consume too much sodium and fat. The majority of schools are fully and successfully meeting the current nutrition requirements already; this is not a time for rolling back the standards.

To ensure that children get the full value from the new healthier school meals, we offer these recommendations to increase the reach of the school nutrition programs:

- Ensure that students who are eligible for free and reduced-price school meals are certified by working with states to improve and strengthen direct certification systems, and address any barriers in the school meal application process;
- Encourage schools to offer free breakfast and lunch to all students through the Community Eligibility Provision, and any other federal provisions that are available to schools; and
- Promote breakfast in the classroom and other alternative school breakfast models.

In summary, we are concerned about proposed revisions to the school meal standards. The healthier school meal rules have been an important step to ensure that California kids are healthy and ready to learn. California and our nation's children need and deserve strong, evidence-based nutrition standards that support their learning, health, and well-being.

Sincerely,



Anna Colby, MS, MPP
Nutrition Policy Advocate
California Food Policy Advocates

¹ United States Department of Agriculture. "Fact Sheet: Healthy, Hunger-Free Kids Act School Meals Implementation." <http://content.govdelivery.com/accounts/USDAOC/bulletins/b92be6>