



The Colorado Health Foundation™

April 21, 2020

Tina Namian
Chief, School Programs Branch
Policy and Program Development Division
U.S. Department of Agriculture
Food and Nutrition Service
3101 Park Center Drive – Room 418
Alexandria, VA 22302

RE: Simplifying Meal Service and Monitoring Requirements in the National School Lunch and School Breakfast Programs, FNS-2019-0007.

To Ms. Namian:

The Colorado Health Foundation appreciates the opportunity to provide feedback on the United States Department of Agriculture's (USDA or the Department) proposed rule "Simplifying Meal Service and Monitoring Requirements in the National School Lunch and School Breakfast Programs."¹ While we applaud the Department's commitment to reducing food waste and improving program efficiency, we are concerned that components of the proposed rule would weaken important aspects of the current school meal nutrition standards and significantly unravel the progress made towards improving child nutrition. We strongly encourage the Department to maintain the current evidence-based school nutrition standards to ensure that all children have access to foods that support their health, well-being, and learning.

The Colorado Health Foundation is the state's largest private foundation and the third largest health foundation in the nation. Our mission is to improve the health of Coloradans. We work closely with partners in the private, public and nonprofit sectors to bring health within reach for all Coloradans, and we do everything with the intent of creating health equity. Ensuring equitable access to affordable, healthy food and promoting food security are critical components of this vision.

Nearly one in 11 (9.2%) Coloradans struggle to put food on the table.² As a partner and funder of the Colorado Blueprint to End Hunger,³ we know that participation in federal nutrition programs leads to improved health and educational outcomes, reduces health care costs and helps to increase local economic activity. Healthy school meals help combat childhood obesity and improve overall health, particularly for low-income children.

¹ See: <https://www.federalregister.gov/documents/2020/01/23/2020-00926/simplifying-meal-service-and-monitoring-requirements-in-the-national-school-lunch-and-school>

² See: <https://www.ers.usda.gov/webdocs/publications/90023/err-256.pdf?v=0>

³ See: <https://www.endhungerco.org/>

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The proposed rule would roll back important aspects of the current school meal nutrition standards and hinder the progress made under the Healthy, Hunger-Free Kids Act of 2010. USDA's own research, as well as research from others, shows that the current standards have significantly improved the nutrition content of school meals, with student participation in meal programs highest in schools that serve the healthiest meals.⁴

Under the proposed rule, schools would be allowed to serve less fruit, fewer whole grains, fewer varieties of vegetables, and more starchy vegetables. Foods like pizza and cheeseburgers could be served more often without being required to meet nutrition standards. A recent analysis⁵ found that the proposed changes would have negative impacts on kids' health and academic achievement. Children from low-income families attending majority black and Hispanic schools and children living in rural communities would be disproportionately impacted. These are kids who are already at highest risk for obesity and related health conditions.

During the current COVID-19 health crisis, the critical importance of healthy school meals is being reaffirmed. At least 121,000 schools serving more than 54 million children across the United States have closed. States and school districts are taking necessary steps to ensure that children still receive healthy, nutritious meals every day. We commend the USDA for the positive steps taken to give schools flexibility in how they serve meals during the pandemic and encourage the Department to remain committed to students' health and education over the longer-term. Now is not the time to weaken school nutrition standards – we should be raising the bar, not lowering the floor, when it comes to providing children healthy food.

In summary, we strongly oppose the provisions of the proposed rule which undermine efforts to improve the quality and nutritional value of foods served in schools, namely the rollback of vegetable subgroups and fruit quantities, and the extended entrée exemption timeframe for competitive foods. We believe these policies would disproportionately impact lower-resourced schools and children and encourage the Department to maintain the integrity of the current, science-based guidelines by not finalizing these provisions. We thank you for your consideration of our comments. If you have any questions, please contact Alexis Weightman, Colorado Health Foundation senior policy officer, at aweightman@coloradohealth.org or 303-953-3600.

Sincerely,



Kyle Rojas Legleiter
Senior Director of Policy
Colorado Health Foundation

⁴ USDA, FNS. School Nutrition and Meal Cost Study, Summary of Findings. April, 2019. See: https://fns-prod.azureedge.net/sites/default/files/resource-files/SNMCS_Summary-Findings.pdf

⁵ Healthy Eating Research. Rapid Health Impact Assessment on USDA Proposed Changes to School Nutrition Standards. March, 2020. See: <https://healthyeatingresearch.org/research/rapid-health-impact-assessment-on-usda-proposed-changes-to-school-nutrition-standards/>