

July 1, 2021

Honorable Tom Vilsack  
Secretary  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

Dear Secretary Vilsack:

We thank you for your commitment to addressing both food and nutrition insecurity through the school meals program and for the important actions the U.S. Department of Agriculture (USDA) has already taken to ensure continued access to free school meals for all children and providing additional food assistance for children through the Pandemic EBT program. As you know, the pandemic has added urgency to food and nutrition insecurity which disproportionately affects under-resourced communities and BIPOC families. Due to the economic downturn, more children will likely qualify and rely on school meals for daily nutrition.

According to USDA's School Nutrition and Meal Cost Study, the updated school nutrition standards have significantly increased the nutritional quality of meals while increasing participation and not contributing to increased food waste. The Harvard University T.H. Chan School of Public Health concluded that the 2012 update to school meal standards and the 2013 update to competitive foods is, "one of the most important national obesity prevention policy achievements in recent decades." Those researchers estimate that the improvements could prevent more than two million cases of childhood obesity and save up to \$792 million in health-care related costs over ten years. Another study found that for children in poverty, the risk of obesity declined substantially each year after implementation of the Healthy, Hunger-Free Kids Act (HHFKA) such that obesity prevalence would have been 47 percent higher in 2018 if the nutrition standards had not been updated. A recent study by the Icahn School of Medicine at Mount Sinai, New York and Tufts University found that children are getting their healthiest meals at school.

We appreciate that the American Families Plan recognizes the progress schools have made and builds on these investments by including \$1 billion for school nutrition. The proposal states, "[t]o build on progress made during the Obama Administration to improve the nutrition standards of school meals, this new \$1 billion demonstration will support schools that are further expanding healthy food offerings. For example, schools adopting specified measures that exceed current school meal standards will receive an enhanced reimbursement as an incentive." As you further develop this proposal, we ask the following priorities be included:

**As stated in the proposal, provide an enhanced reimbursement for schools that exceed the current school meal standards, particularly for schools meeting Target 2 or Target 3 sodium levels and limiting added sugars.** Schools are currently required to meet the updated nutrition standards from 2012 (77 FR 4088, January 26, 2012) since the rollbacks on sodium, whole grains, and flavored milk under the previous administration were vacated by a federal court last year. While the vast majority of schools were meeting these standards, many schools were still working towards Target 2 sodium reduction, and a handful of schools had begun working toward Target 3. Meanwhile, most were meeting the 100 percent whole-grain-rich requirement; only 15-20 percent of schools had waivers for individual products. Schools will need to get back on track toward safe and healthy levels of sodium and providing 100-percent whole-grain-rich items.

Further, the 2012 nutrition standards did not include an added sugars limit for meals because there was no corresponding recommendation in the 2010 Dietary Guidelines for Americans. Since then, the 2015 and 2020 Dietary Guidelines have recommended that no more than ten percent of calories come from added sugars. Further, the updated Nutrition Facts panel now requires all food manufacturers to include the amount of added sugars in products. The Secretary has previously stated that schools will need to address limiting added sugars.

We recommend that schools receive an enhanced reimbursement for meeting Target 2 or 3 sodium levels or for limiting added sugars consistent with the Dietary Guidelines for Americans. For added sugars, this could be done in a number of ways, including: that no more than 10 percent of calories come from added sugars as an average over the week, similar to how sodium and saturated fat are measured; or limiting the top sources of added sugars in meals, with particular focus on breakfast, flavored milk, toppings and condiments, and breakfast pastries. Finally, we would strongly urge USDA to fund activities that most directly help schools meet and exceed the nutrition standards.

Providing a financial incentive is critical to supporting these efforts. According to USDA estimates, school meal costs exceed reimbursement by, on average, 49 cents per lunch and 84 cents per breakfast (based on USDA's School Nutrition and Meal Cost Study, data taken from school year 2014-2015). While schools receive a performance-based reimbursement for lunch (currently an additional seven cents, adjusted annually for inflation) for meeting the updated nutrition standards under HHFKA, that incentive could be increased. Increasing the performance-based reimbursement for breakfast could be particularly effective to decrease sodium and added sugars given that breakfast did not receive a performance-based boost in reimbursement under HHFKA.

**USDA must provide the technical assistance and needed transparency to support schools in meeting or exceeding the school meal standards.** As schools anticipate being fully in-person in the fall and COVID-related supply chain issues are more resolved, we urge USDA to provide robust technical assistance for schools using information gained from the meal pattern waiver implementation to identify which programs might be facing continued or additional challenges. We encourage USDA to reinstitute technical assistance trainings and peer-to-peer convenings such as *Team Up for School Nutrition Success*; initiatives focused on certain standards such as *What's Shaking in School Meals?* for sodium and create a similar one for whole grains and added sugars; and recognition programs such as the *HealthierUS School Challenge*. In addition, we urge USDA to dedicate at least \$20 million total in funding (\$10 million for third-party competitive technical assistance grants and \$10 million for state agencies) for robust technical assistance and training to aid programs in meeting the sodium and whole-grain-rich standards as well as reducing added sugars to help schools meet an eventual added sugars standard. This technical assistance could also provide best practices and in-depth trainings for procurement, budgeting, meal planning, marketing and promotion, culinary skills, and nutrition education. Targeted technical assistance for programs has shown success in meeting the school meal standards. It's not enough to provide guidance and performance-based incentives; USDA must strongly commit and be proactive in ensuring success for all schools.

USDA must publicly report on its technical assistance efforts on sodium, whole-grain-rich, and added sugars. This includes progress by schools to meet the standards and efforts by USDA to work with industry to provide products that meet the standards. USDA must also annually post the performance-based certification data for schools, which was last publicly posted in 2016. This kind of transparency not only allows stakeholders to understand the progress being made, but will aid in identifying any challenges and best practices.

Finally, USDA must complement efforts to improve access to healthy meals that align with the most recent Dietary Guidelines for Americans by better coordinating and investing in USDA nutrition

education programs including SNAP Education (SNAP-Ed), Expanded Food and Nutrition Education Program (EFNEP), and Team Nutrition. These programs both directly and indirectly influence the dietary behaviors of children who participate in the National School Lunch and Breakfast Programs. By providing the nutrition education, policy, systems, and environmental supports to help make the healthy choice the easy choice, USDA will be better positioned to meet its goal for nutrition security, especially in communities of color that have been most impacted by the pandemic.

In conclusion, we thank the administration for proposing \$1 billion for school nutrition and strongly support dedicating this funding to financial incentives for meeting the nutrition standards, as stated in the proposal, and coupled with increased technical assistance. In addition, we were pleased to see the inclusion of actions to remove lead from drinking water and to update water infrastructure, and support for kitchen equipment grants and reducing environmental waste in the American Jobs Plan.

Sincerely,

Academy of Nutrition and Dietetics  
American Academy of Pediatrics  
American Cancer Society Cancer Action Network  
American Heart Association  
American Public Health Association  
Association of SNAP Nutrition Education Administrators (ASNNA)  
Association of State Public Health Nutritionists  
B.Komplete  
Balanced  
Beyond Hunger  
Center for Science in the Public Interest  
Chef Ann Foundation  
Children's Council of San Francisco  
Coalition for Healthy School Food  
Community Food Advocates  
Consumer Federation of America  
Earthjustice  
First Focus on Children  
FoodCorps  
Healthy Food America  
Healthy Schools Campaign  
Illinois Public Health Institute  
Johns Hopkins Center for a Livable Future  
Jump IN for Healthy Kids  
Kentucky Equal Justice Center  
Laurie M. Tisch Center for Food, Education & Policy  
LunchAssist  
MomsRising  
National Association of Pediatric Nurse Practitioners  
National Athletic Trainers' Association  
National League for Nursing  
National Wellness Policy Study at the University of Illinois Chicago  
National WIC Association  
Nemours Children's Health  
Network of Jewish Human Service Agencies  
North Carolina Alliance for Health

Physicians Committee for Responsible Medicine  
Society for Nutrition Education and Behavior  
Society of Behavioral Medicine  
The Food Trust  
Urban School Food Alliance

Cc

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