



American Society for Nutrition
Excellence in Nutrition Research and Practice

May 9, 2023

U.S. Department of Agriculture Food and Nutrition Service
School Meals Policy Division
P.O. Box 9233
Reston, Virginia, 20195

Re: Docket No. FNS-2022-0043-0001, Child Nutrition Programs: Revisions to Meal Patterns Consistent with the *2020 Dietary Guidelines for Americans*

To Whom it May Concern,

The American Society for Nutrition (ASN) appreciates the opportunity to comment on Child Nutrition Programs: Revisions to Meal Patterns Consistent with the *2020 Dietary Guidelines for Americans (DGAs)*. Established in 1928, ASN is a non-profit organization dedicated to our mission of advancing the science, education, and practice of nutrition. ASN has more than 8,000 members around the world, working throughout government, clinical practice, academia, and industry, to conduct research to achieve the ASN vision of “A Healthier World Through Evidence-Based Nutrition.”

ASN supports USDA’s proposed revisions to the child nutrition program meal patterns to be more consistent with the *2020 DGAs* in order to reflect the latest nutrition science that will best support and improve the health and nutrition of our nation’s growing children. ASN appreciates USDA’s efforts to provide flexibility in the variety and choices offered in school meals while ensuring the highest quality nutrition for our nation’s children and the USDA’s expanded recognition of cultural and traditional food options that best support healthy dietary patterns for our nation’s diverse children.

According to the *DGAs*, “the science underlying the Guidelines demonstrates that healthy eating across the lifespan can promote health and reduce risk of chronic diseases.” Nutrition interventions that mitigate the risk of chronic disease earlier in life can have a substantial effect over time, as children with obesity are five times as likely to have obesity as adults¹. According to the Centers for Disease Control and Prevention (CDC), obesity alone accounts for \$173 billion in healthcare costs each year, affecting more than one-in-five children². Currently, 14.7 million children and adolescents have obesity (accounting for 19.7% of the U.S. population), and the prevalence is higher among Black and Hispanic children³.

The *DGAs* identify several key food categories that most Americans, including children, fall

¹ M Simmonds, A Llewellyn, C G Owen, N Woolacott. 2016. Predicting adult obesity from childhood obesity: a systematic review and meta-analysis. *Obes Rev* 17(2):95-107. doi: 10.1111/obr.12334.

² <https://www.cdc.gov/obesity/about-obesity/why-it-matters.html>

³ <https://www.cdc.gov/obesity/data/childhood.html>

short of recommended intakes. School meals play a crucial role in improving the overall health of students. Most children consume as much as half of their daily calories at school⁴. For some students, school meals may be their most reliable and main source of nutrition: 1 in 8 children in the U.S. live in households without consistent access to adequate food⁵. The school meal nutrition standard revisions set the stage for healthier outcomes at these key periods of growth and development, and may assist in the formation of lifelong taste preferences that could encourage healthier dietary patterns.

ASN supports the goal of schools as nutritious environments that help students make healthy food choices and ASN supports USDA's proposed revisions. ASN's specific comments on the options that were provided in the proposed rule are outlined below.

Added Sugars Standards

ASN supports implementing an added sugars limit to better align school meal and Child and Adult Care Food Program (CACFP) nutrition standards with the *DGAs* that limit children's intake of added sugars to less than 10% of calories per day. ASN supports applying added sugar limits to the products that are the leading contributors of added sugars in school breakfasts and lunches.

Milk Standards

The *DGAs* call out both the increasing intakes of sugar-sweetened beverages and decreasing intakes of dairy as notable and concerning shifts in consumption throughout youth. The *DGAs* note that beverages that contain no added sugars should be the primary options for children and adolescents, including water and unsweetened fat-free or low-fat milk—including low-lactose or lactose-free options or fortified soy beverage—and 100% juice. Therefore, ASN supports Alternative A, with flavored milk restrictions for grades K-5, giving middle and high school students who are old enough to make healthy food choices the option to have flavored milks that fit within the new added sugars limits with school breakfast and lunch. Similar changes in the Special Milk Program and CACFP are encouraged.

If USDA does implement Alternative A, ASN encourages USDA to research the impact on K-5 milk consumption, food waste, and students' health, including the levels of nutrients of concern which are found in milk, including vitamin D, calcium, and potassium, over a set period of time and to make adjustments as needed.

While the school meal programs should offer dairy alternatives that allow students to meet their dietary needs, it is important that dairy substitutions be nutritionally comparable to milk.

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<https://www.cdc.gov/healthyschools/nutrition/schoolnutrition.htm#:~:text=Most%20US%20children%20attend%20school,shape%20lifelong%20healthy%20eating%20behaviors.>

⁵ <https://schoolnutrition.org/about-school-meals/school-meal-statistics/>

According to the *DGAs*, the nutrients of public health concern, which include calcium, vitamin D, and potassium, apply to children and adolescents as well and milk provides these vital nutrients. Except for fortified soy beverages and soy yogurt, the *DGAs* do not include other plant-based beverages as part of the dairy group because their overall nutritional content is not similar and these key nutrients found in dairy and fortified soy beverages or soy yogurt are often lacking.

Whole Grain Standards

ASN supports maintaining the current requirement that at least 80% of the weekly grains offered for school meals be whole grain-rich (containing 51-100% whole grains) and requiring that the remaining 20% of weekly grains offered be enriched grains fortified with folic acid for the time being, with later requirements fully meeting the *DGA* recommendation that at least half of total grains consumed be whole grains. The *DGAs* note that whole grains are infrequently consumed by any youth and are consumed below recommended levels even by young children.

Sodium Limits

The *DGAs* recommend consumption of less than 2,300 milligrams per day, and even less for children younger than age 14. Just as the proposed added sugars regulations include product-based limits, ASN also supports that USDA plans to implement product-based sodium limits as well for products which are top contributors of sodium in school meals.

The gradual approach to reductions in weekly sodium limits that USDA has proposed for school lunch and breakfast every other SY would help students to achieve a reduction in sodium consumption. However, ASN encourages USDA to research the impact of Target 1A sodium limits after implementation in July 2023 on menu planning, meal participation and students' health prior to implementation of weekly sodium reductions in SY 2025 to adjust them as needed.

Menu Planning Options for American Indian and Alaska Native Students/ Traditional Foods

ASN appreciates USDA encouraging schools to “consider ethnic and religious preferences when planning and preparing meals” and offering a wide variety of foods to be served to meet cultural and traditional dietary preferences. ASN supports stating in regulation that traditional foods may be served in reimbursable school meals. ASN supports allowing tribally operated schools, schools operated by the Bureau of Indian Education, and schools serving primarily Native Indian, Alaskan, or Hawaiian children, to serve vegetables to meet the grains requirement, as well as additional menu planning options that best meet nutrition standards and cultural and traditional dietary preferences.

ASN supports additional nutrition education in the school system to educate students on how to make healthy food and dietary patterns choices, as well as lifestyle choices that support healthy eating and physical activity. Increased nutrition education and training is also needed for the

individuals preparing and serving school meals.

Thank you again for the opportunity to comment and offer ASN's support for the science-based revisions proposed by USDA to better align school meal programs with the *DGAs*. These proposed revisions will enhance the nutrition and health of children. Please contact Sarah Ohlhorst, MS, RD, ASN Chief Science Policy Officer (240-428-3647; sohlhorst@nutrition.org) if ASN may provide additional information.

Sincerely,

A handwritten signature in black ink that reads "Martha A. Belury". The signature is written in a cursive, flowing style.

Martha A. Belury, PhD, RDN
2022-2023 President, American Society for Nutrition