

April 22, 2020

School Programs Branch  
Policy and Program Development Division  
Food and Nutrition Service  
U.S. Department of Agriculture  
1320 Braddock Place, 4<sup>th</sup> Floor  
Alexandria, VA 22314

RE: Docket No. FNS-2019-0007; Simplifying Meal Service and Monitoring Requirements in the National School Lunch and School Breakfast Programs

Dear School Programs Branch:

National PTA and the undersigned 48 State PTAs appreciate the opportunity to comment on the U.S. Department of Agriculture's (USDA) "Simplifying Meal Service and Monitoring Requirements in the National School Lunch and School Breakfast Programs" proposed rule (85 FR 4094). National PTA has a proud legacy of supporting the federal school meal program. Our members' advocacy was critical to the passage of the original National School Lunch Act in 1946 and in the decades since then we have spoken out strongly in support of efforts to improve child nutrition. Most recently we supported the robust nutrition standards for school meals included in the Healthy, Hunger-Free Kids Act of 2010. The proposed rule change altering the requirements for school meals would be an unfortunate step in the wrong direction, undermining schools' efforts to provide students with more nutritious meals and threatening the long-term health and well-being of our nation's most vulnerable children. We urge you to reject the proposed changes.

Food consumed at school can make up half of a child's daily calorie intake—and even more for the 22 million children who participate in the free and reduced-price school meal program<sup>1</sup>. For this reason, it's essential that school meals and snacks meet nutrition standards aligned with the Dietary Guidelines for Americans (DGAs) for fruits and vegetables, sodium and whole grains, milk and added sugars. Researchers agree that providing school meals that meet the highest nutrition standards can have long-term impact on children's health. For example, 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."<sup>2</sup> Researchers estimate that these

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<sup>1</sup> Food Research and Action Center, "National School Lunch Program," <https://frac.org/programs/national-school-lunch-program>

<sup>2</sup> Gortmaker SL, Wang YC, Long MW, et al. Three Interventions that Reduce Childhood Obesity Are Projected to Save More Than They Cost to Implement. *Health Aff.* 2015;34:1932-9.

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.

Given what we know about the importance of high nutrition standards and the long-term impact on children's health and well-being, we are particularly concerned about the following aspects of the proposed rule:

- **The a la carte "loophole."** Currently entrées that are part of the school meal can be served a la carte and be exempt from the competitive food standards the day the meal is served and day after. The proposed rule widens this loophole by extending the exemption by an additional day. If put into effect, we fear this provision would allow children to eat pizza, hamburgers, chicken nuggets and similar less healthful items every day by purchasing them from the a la carte line.
- **Decreased variety of vegetables.** The proposed rule decreases the required amount of red/orange and "other" vegetables that must be served as part of the school meal program. The rule also proposes making permanent the potato appropriations rider that allows schools to substitute vegetables for fruit in breakfast. Taken together, these two proposals would lead to less fruit and less variety of vegetables in school meals, replaced with more potatoes (French fries and hash browns). Critically, this change runs counter to the recommendations included in the Dietary Guidelines for Americans, which were the basis for the vegetable subgroups included in the 2012 school meal requirements.
- **Halving the fruit requirement in breakfast outside the cafeteria.** The proposed rule would reduce the amount of fruit offered to children who for breakfast in the classroom from one cup to one-half cup. This is inconsistent with the recommendations of the Dietary Guidelines of America, which suggest that five cups of fruit be offered per week for children in grades K-12. For all children, this is incompatible with a healthy diet; for the 22 million lower-income children who rely on school meals for most of their meals, this poses an equity concern.

We are perplexed why USDA is proposing changing school meal requirements when all the evidence shows that the improvements put in place by the 2010 legislation are a success. The USDA itself reports that schools participating in the National School Lunch Program and School Breakfast Program have made and continue to make great strides toward serving healthier meals for students.<sup>3</sup> USDA's research also showed that participation in the school meal program is highest in the schools with the healthiest meals. The majority of parents also support higher school meal nutrition standards.<sup>4</sup> The USDA's proposed changes also represent a deviation from clear Congressional intent. Congress enacted the Healthy, Hunger-Free Kids Act of 2010 with strong bipartisan support. The progress we have made in ensuring the nation's

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<sup>3</sup> U.S. Department of Agriculture. School Nutrition and Meal Cost Study. Washington, DC. USDA; 2019

<sup>4</sup> Hart Research Associates and Ferguson Research. Nationwide Polling Regarding Parents' Views of School Meal and Smart Snacks Standards telephone poll among 1,112 parents. 2014

children are provided healthy school meals that meet the highest nutrition standards must not be undone.

National PTA and its 54 state congresses recognize that good nutrition is essential to children's health and well-being. Federal nutrition programs such as the School Breakfast Program and National School Lunch Program are vital to ensuring that all children receive the healthy meals that allow them to learn and thrive in school and at home. Weakening the nutrition requirements governing the school meal program puts the long-term health and well-being of children at risk. We urge USDA to withdraw the proposed rule. Please contact Jacki Ball, National PTA Director of Government Affairs, at [jball@pta.org](mailto:jball@pta.org) to answer any questions or provide further input as needed.

Sincerely,

National PTA  
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Alaska PTA  
Arizona PTA  
Arkansas PTA  
California PTA  
Colorado PTA  
Connecticut PTA  
Delaware PTA  
European PTA  
Florida PTA  
Hawaii PTSA  
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