March 24, 2022

School Programs Branch
Policy and Program Development Division
Food and Nutrition Service
1320 Braddock Place, 4th Floor
Alexandria, Virginia 22314

Re: Docket No. FNS-2020-0038; Child Nutrition Programs: Transitional Standards for Milk, Whole Grains, and Sodium

As the oldest and largest child advocacy association in America, National PTA submits these comments in response to the U.S. Department of Agriculture’s (USDA) “Child Nutrition Programs: Transitional Standards for Milk, Whole Grains, and Sodium” final rule (87 FR 6984), which will provide necessary flexibility to schools for SY 2022-2023 and SY 2023-2024 as they respond to and recover from the COVID-19 pandemic. Ultimately, we urge the USDA to align school meals with the 2020-2025 Dietary Guidelines for Americans (DGA), particularly with respect to added sugars, sodium, and whole grains in the rulemaking expected later this year.¹

Introduction

On average, approximately 29.6 million children at almost 100,000 schools are served by the National School Lunch Program (NSLP)² and 14.8 million children at about 90,000 schools are served by the federal School Breakfast Program (SBP) every school day.³ For many of these children, breakfast and lunch provided at school may be their only nutritious meals they will consume in a day. In fact, on average, a child will consume about one-third to one-half of their daily calories during the school day.⁴

We know that healthy children learn better and are more productive—both in and out of the classroom. Setting strong nutritional standards in our nation’s schools is essential to combating the concerning obesity rates among American children. Providing our nation’s youth with healthy food options and nutrition education is key to their long-term health and success, which is why National PTA supports policies that build healthy eating habits and ensure a brighter and healthier future for our children.

¹ The USDA’s regulatory agenda includes proposed rulemaking on “Child Nutrition Programs: Revisions to Meal Patterns Consistent With the 2020 Dietary Guidelines for Americans” for release as early as October, 2022. See: https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202110&RIN=0584-AE88
Given that the pandemic has worsened the childhood obesity crisis, school meal nutrition standards need to be strong and evidence-based now more than ever. With the support of USDA, states and local jurisdictions can align the transitional standards to support the continued provision of nutritious school meals with the 2020-2025 Dietary Guidelines for Americans (DGA), to keep our nation’s children and youth healthy.

**The Final Rule & Fall Rulemaking**

National PTA supports the USDA’s transitional approach to implementing strong nutritional standards in our nation’s schools that are essential to combating the concerning obesity rates among children and ensuring that all children are well fed during the school day. Given the unprecedented nature of global supply chain disruptions and labor shortages that have placed immense challenges on schools, we believe this temporary relief is warranted and support the USDA’s plan for short-term flexibility around flavored milk, sodium, and whole grains. The USDA has made clear that this final rule is a bridge to rulemaking in the fall of 2022 that will strengthen the school meal nutrition standards to be consistent with the 2020 Dietary Guidelines for Americans, as required by law, and provide longer-term certainty to schools and the school food service industry.

The remainder of this comment provides recommendations related to the fall rulemaking stage of the USDA’s transitional approach—the issuance of a proposed rule in fall 2022 that will address school meal nutrition standards for SY 2024-2025 and beyond (“Child Nutrition Programs: Revisions to Meal Patterns Consistent With the 2020 Dietary Guidelines for Americans”).

**Standards Related to Milk and Added Sugars**

USDA’s final rule allows low-fat flavored milk as a competitive option with the requirement that schools must serve unflavored milk if serving flavored milk. We know that flavored milks are a top source of

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added sugars in schools. Among children, intake of added sugars has been associated with weight gain, dental decay, and an increase in risk factors for cardiovascular disease.

The current school nutrition standards do not address added sugars; despite the 2020 DGA recommending that no more than 10 percent of daily calories come from added sugars, in the absence of a requirement to limit added sugars, unsurprisingly, school meals contain added sugars in excess of the limit recommended by the DGA. Nine out of ten schools exceed the 2020 DGA limit for added sugars for breakfast meals, and nearly seven out of ten schools exceed the limit for lunch. At current levels, a typical school breakfast can easily exceed an entire day’s worth of added sugars for a child. Moreover, the 2020 DGA recommends beverages that are calorie-free, especially water, or that contribute to beneficial nutrients, such as fat-free and low-fat milk and 100% juice, as the primary beverages to be consumed.

National PTA also recognizes and promotes healthy hydration as an important factor for our children’s health and wellness. By ensuring that low-fat or nonfat unflavored milk is served alongside low-fat flavored milk, and that the flavored milk offered is not high in added sugars or synthetic additives, USDA can help keep students healthy and ready to learn and reach their full potential.

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6 Fox MK, Gearan EC, Schwartz C. Added Sugars in School Meals and the Diets of School-Age Children. *Nutrients*. 2021;13:471. The top ten sources of added sugars in school breakfast and percent contribution to total amount are: flavored skim milk (29 percent); sweetened cereals (13 percent); condiments and toppings (11.8 percent); muffins and sweet/quick breads (7.3 percent); granola bars and breakfast bars (5 percent); toaster pastries (4.3 percent); pancakes, waffles, and French toast (3.8 percent); crackers, croutons, pretzels (3.6 percent); cinnamon buns (2.8 percent); and yogurt (2.8 percent). The top ten sources of added sugars in school lunch and percent contribution to total amount are: flavored skim milk (46.9 percent); condiments and toppings (9 percent); flavored 1-percent milk (3.2 percent); breads, rolls, bagels, and other plain breads (2.7 percent); canned peaches (2.4 percent); cookies, cakes, brownies (2.3 percent); sandwich with breaded meat, poultry, or fish (2.1 percent); juice (1.8 percent); black, baked, and other beans (1.8 percent); and hamburgers and similar beef pork sandwiches (1.8 percent).


11 Fox, 2021

12 Fox, 2021.

Standards Related to Sodium

USDA’s final rule establishes Sodium Target 1 for school lunch and breakfast in SY 2022-2023 as proposed, but implements Sodium Target 1A, an interim sodium-reduction target, of a 10-percent reduction in sodium for school lunches by SY 2023-2024 (effective July 1, 2023).

National PTA applauds the USDA for taking a step in the right direction for our nation’s children’s health. The 2020 DGA\(^\text{14}\) recommends that no more than 2,300 mg sodium is safe for ages 14 years and up and has reduced the amount of sodium considered safe for children to ≤ 1,500 mg/day for children ages 4-8 years and to ≤ 1,800 mg/day for children ages 9-13 years based on the National Academies of Sciences, Engineering, and Medicine (NASEM) Dietary Reference Intake (DRI) report for sodium in 2019.\(^\text{15}\) That report established a Chronic Disease Risk Reduction (CDRR) level for sodium. If a healthy student population were to exceed those levels of sodium for an extended period of time it would create an overall increased chronic disease risk. NASEM, and subsequently the 2020 DGA, made even stronger sodium recommendations for younger school-aged children than was the case when the 2012 school meal standards were finalized, then based on the 2010 DGA.\(^\text{16}\)

National PTA agrees that lowering the amount of sodium in our children’s diets is necessary and vital to their overall health and well-being. Studies have recorded that nine out of ten children consume too much sodium,\(^\text{17}\) thus increasing their risk of high blood pressure, heart disease, and stroke over time.\(^\text{18}\) Children of all ages, on average, consume between 2,525 mg and 3,900 mg of sodium per day, well over the recommended levels.\(^\text{19}\) The American Heart Association reported that as dietary sodium intake rises, so does blood pressure.\(^\text{20}\) Other studies have shown a link between high blood pressure in childhood and high blood pressure in adulthood. Moreover, it has been revealed that high blood pressure in childhood is linked to early development of heart disease and a risk for premature death.\(^\text{21}\)


\(^{16}\) 85 FR 75241: Section 9(f)(1) of the Richard B. Russell National School Lunch Act (NSLA), as amended, 42 U.S.C. 1758(f)(1), requires that school meals are consistent with the goals of the latest Dietary Guidelines for Americans (Dietary Guidelines).


\(^{21}\) Id., Appel LJ.
The prevalence of high blood pressure is increasing in American children. One in six children between the ages of 8 to 17 will test and confirm elevated blood pressure. In addition, children who eat higher-sodium diets are about 40 percent more likely to have elevated blood pressure than children who eat lower-sodium diets.

Prior to the pandemic, many schools nutritional staff worked tremendously hard and either met or were very close to meeting Sodium Target 2 levels. For example, the school meals program in Elbert County Schools, Georgia has done tremendous work to get their menus down to safe levels of sodium. They have employed tactics such as training staff to analyze sodium content in their menus; educating students on nutrition and menu changes; worked with local and regional companies to find alternative products that met their sodium needs; and reworked their recipes to keep their foods with less sodium appealing to students. Other schools have also lowered sodium intake by implementing spice bars and salad bars that give students more options to provide flavor to food with less salt. Many schools from across the country—from Virginia to California, Indiana to Kansas, Oklahoma to New York, and Georgia to North Dakota—have shared their success stories and best practices of how they met Target 2 sodium levels. National PTA recommends for the USDA to elevate and share these methods widely to encourage their adoption by other schools around the country.

National PTA supports this gradual approach towards sodium reduction in school meals and encourages the USDA to continue to support progress towards achieving sodium reduction standards more closely aligned with the 2020-2025 Dietary Guidelines for Americans.

Standards Related to Whole Grains

The USDA final rule changes the whole-grain-rich requirement from 100 to 80 percent starting at the beginning of the SY 2022-2023. Meaning, beginning in SY 2022-2023, this final rule will require at least 80 percent of the weekly grains in the school lunch and breakfast menus to be whole grain rich.

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25 Id., Rosner B.

26 U. S. Department of Agriculture. Training the Teachers in Our Biggest Classrooms.
Eating more whole grains is associated with reduced risk of heart disease, stroke, and diabetes, provides more nutrients, and is a healthful source of fiber.\textsuperscript{27} Children between the ages of 4 to 18 do not meet the recommended intake for whole grains and exceed the recommended limit for refined grains.\textsuperscript{28}

According to the USDA, the vast majority of schools (85 percent) were meeting the 100 percent whole grain-rich standard.\textsuperscript{29} Successful strategies for encouraging students to eat more whole grains include student surveys, samples and taste tests, experimenting with new products and recipes, and peer-to-peer sharing of food preparation techniques. These techniques have also been successful in sodium reduction efforts.

Given the flexibilities provided in recent years as a result of the rollbacks and the pandemic waivers, it is reasonable that schools need time to return to serving grains consistent with the DGA. Without a clear commitment from the USDA in recent years around the importance of offering whole-grain-rich products, coupled with the supply chain and labor disruptions of the pandemic, schools and some companies will need time to recommit to whole-grain-rich products despite top companies already providing ample options. However, we urge the USDA to set a standard that ensures at least half of all grains students consume at school are whole. We also urge the USDA to provide training and technical assistance to school districts that are expressing difficulty finding acceptable whole-grain-rich products.

National PTA also recommends that the USDA take action to ensure that any updates to the school nutrition standards are accessible and easy to understand by parents, families, caregivers, and school administrators and staff. As partners in their children’s learning and well-being, it is critically important that healthy nutrition information is readily available to parents and caregivers and that there are opportunities for families to participate in the development of their school wellness policies. We were excited to see that the USDA is already working to integrate nutrition science into policy, systems, and environments, including by working to translate the latest DGAs into information consumers can use. We agree that “Effective nutrition education materials that lead to increased knowledge and/or a change in behaviors requires meeting people where they are with messages that are clear, relevant, and appropriate for the intended audience.”\textsuperscript{30} We offer our assistance and support, as the oldest child

\textsuperscript{28} \textit{Males (grains in ounce-equivalents):} aged 4 to 8: average whole grains 0.7, average refined grains 5.4, recommended range for whole or total grains 2.0–3.0; aged 9 to 13: average whole grains 0.7, average refined grains 6.6, recommended range for whole grains 2.5–4.5; aged 14 to 18: average whole grains 0.8, average refined grains 7.5, recommended range for whole grains 3.0–5.0. \textit{Females (grains in ounce-equivalents):} aged 4 to 8: average whole grains 0.5, average refined grains 5.0, recommended range for whole grains 2.0–3.0; aged 9 to 13: average whole grains 0.6, average refined grains 6.0, recommended range for whole grains 2.5–3.5; aged 14 to 18: average whole grains 0.5, average refined grains 5.5, recommended range for whole grains 3.0–4.0. Data source: U.S. Department of Agriculture and U.S. Department of Health and Human Services. \textit{What We Eat in America, NHANES 2007-2010}. Beltsville, MD: USDA, 2010.
\textsuperscript{29} 82 FR 56703
advocacy organization in the nation, serving millions of families across the country, as a partner in the ongoing collaboration and partnerships around this effort.

Conclusion

In conclusion, National PTA applauds USDA and their continued progress to meet the 2020-2025 Dietary Guidelines for Americans. PTA’s mission is to make every child’s potential a reality by engaging and empowering families and communities to advocate for all children. This is why we urge the USDA to continue the work of aligning school meals with the 2020-2025 Dietary Guidelines for Americans (DGA), particularly with respect to added sugars, sodium, and whole grains in the rulemaking expected later this year.

We call upon the USDA to boost child health by including robust school meal requirements on milk, whole grains, fruits and vegetables, calorie limits, and limits on sugar and sodium, and encourage the agency to deliver technical assistance and resources to schools that are not meeting the nutrition standards. Together, these efforts along with Reauthorization of the Child Nutrition Act by Congress, will help ensure the long-term health and success of our nation’s children and future generations.

We appreciate the opportunity to provide comments on “Child Nutrition Programs: Transitional Standards for Milk, Whole Grains, and Sodium” and look forward to the fall rulemaking to continue to bring school meal nutrition standards in alignment with the 2020 Dietary Guidelines for Americans. If you have any questions or would like additional information, please feel free to contact Kate Clabaugh, National PTA Director of Government Affairs, at kclabaugh@pta.org.

Sincerely,

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