

May 9, 2023

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

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

On behalf of the National Parent Teacher Association (National PTA) and our millions of members nationwide, we appreciate the opportunity to comment on the U.S. Department of Agriculture's proposed rule, "Child Nutrition Programs: Revisions to Meal Patterns Consistent With the 2020 Dietary Guidelines for Americans" (88 FR 8050).

PTA is the oldest and largest child advocacy association in America, comprised of millions of parents, teachers, grandparents, caregivers, foster parents and other caring adults who share a commitment to improving the education, health and safety of all children. Our association recognizes that proper nutrition is imperative to the health, development and academic achievement of children, and we know that healthy children learn better and are more productive—both in and out of the classroom.

Based on our experience working in schools and for children across the country, we believe the proposed rule represents a critical step towards helping provide the foundation for all children to learn and thrive, which includes basic necessities like access to clean air, water, and healthy nutrition in all communities. **Our association appreciates the USDA's efforts to bring school meal nutrition standards into alignment with the 2020-2025 Dietary Guidelines for Americans, as required by law,¹ while also providing the flexibility, support, and technical assistance that school nutrition programs need to be successful and continuing to encourage the inclusion of students, parents, and school-based staff in the development, implementation, and evaluation of school wellness and school meal programs across the country.**

On average, approximately 29.6 million children at almost 100,000 schools are served by the National School Lunch Program² and 14.8 million children at about 90,000 schools are served by the federal School Breakfast Program 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

Research has shown that the nutritional content and availability of healthy options for milk, whole grains, fruits and vegetables, calorie limits, and limits on sugar and sodium, can have a lifelong impact on children. For example, intake of added sugars in childhood has been associated with weight gain, dental decay, and an increase in risk factors for cardiovascular disease.^{5,6} Studies have also recorded that nine out of ten children currently consume too much sodium,⁷ thus increasing their risk of high blood pressure, heart disease, and stroke over time.⁸

On the other hand, eating more whole grains is associated with reduced risk of heart disease, stroke, and diabetes, provides more nutrients, and is a healthful source of fiber⁹ and healthy hydration has been shown to be an important factor for our children's health and wellness. It's therefore critical that federal school meals programs be both widely accessed and modernized to improve the meal quality and nutrition school meals provide for all children.

Most notably, the proposed rule will help to reduce added sugars and sodium, while also encouraging more whole grains, fruits and vegetables, and local farm fresh foods in school meals across the country. Gratefully, many school nutrition programs are already meeting these standards or are well on their way to doing so. For those that are not, we encourage Congress to fully fund – and the USDA to deliver – targeted technical assistance and resources to those schools that are facing challenges to meet the nutrition standards, including barriers to accessing specific food products, such that all schools can provide healthy meals to students.

Our association 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, including in an understandable and accessible format and in a language the families can understand, and that there are opportunities for families to participate in the development of their school meal planning and 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."¹⁰ We offer our assistance and support, as the oldest child advocacy organization in the nation, serving millions of families across the country, as a partner in the ongoing collaboration and partnerships around this effort.

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 commend the USDA for continuing to support progress toward aligning school meals with the 2020-2025 Dietary Guidelines for

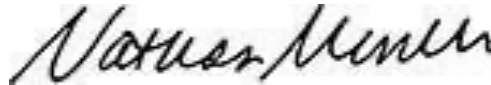
Americans (DGA) through the current proposed rule (88 FR 8050). For more information, please see our association's [recommendations on the USDA's transitional standards](#), our [position on Improving School Meals Program](#), our [position on Nutrition for Children and Families](#), and our [Healthy Lifestyles program](#).

Our association appreciates the opportunity to provide comments on "Child Nutrition Programs: Revisions to Meal Patterns Consistent With the 2020 Dietary Guidelines for Americans," and we look forward to continuing to support ongoing work at the local, state, and national levels to enhance the nutritional health of our nation's children and families. 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,



Anna King
President
National PTA



Nathan R. Monell, CAE
Executive Director
National PTA

¹ Richard B. Russell National School Lunch Act, P. L. No. 79-396, 60 Stat. 230, (codified as amended at 42 U.S.C. §§ 1751 *et seq.*) which "requires that school meals reflect the latest Dietary Guidelines for Americans."

² Toossi, S. National School Lunch Program. USDA ERS - National School Lunch Program. Updated January 2022. See: <https://www.ers.usda.gov/topics/food-nutrition-assistance/child-nutrition-programs/national-school-lunch-program/>

³ Toossi, S. School Breakfast Program. USDA ERS - School Breakfast Program. Updated September 2021. See: <https://www.ers.usda.gov/topics/food-nutrition-assistance/child-nutrition-programs/school-breakfast-program/>

⁴ U.S. Department of Agriculture. School Nutrition Dietary Assessment Study-III. Washington, DC: USDA; 2007.

⁵ Vos MB, et al. Added Sugars and Cardiovascular Disease Risk in Children: A Scientific Statement From the American Heart Association. *Circulation*. 2017 May 9; 135(19):e1017-e1034.

⁶ Moynihan PJ, Kelly SA. Effect on caries of restricting sugars intake: systematic review to inform WHO guidelines. *J Dent Res*. 2014 Jan;93(1):8-18.

⁷ Jackson SL, King SM, Zhao L, Cogswell ME. Prevalence of Excess Sodium Intake in the United States—NHANES, 2009-2012. *MMWR Morb Mortal Wkly Rep*. 2016;64:1393-7. doi:10.15585/mmwr.mm6452a1.

⁸ Appel LJ, Lichtenstein AH, Callahan EA, Sinaiko A, Van Horn L, Whitsel L. Reducing Sodium Intake in Children: A Public Health Investment. *J Clin Hypertens*. 2015;17:657-62. doi:10.1111/jch.12615.

⁹ U.S. Department of Agriculture. All about the Grains Group. <https://www.choosemyplate.gov/eathealthy/grains>. Accessed December 2020.

¹⁰ *USDA Actions on Nutrition Security*. U.S. Department of Agriculture Food and Nutrition Service. Published March 2022. <https://www.usda.gov/sites/default/files/documents/usda-actions-nutrition-security.pdf>.