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April 21, 2023

School Meals Policy Division
4th floor
Food and Nutrition Service
1320 Braddock Place
Alexandria, VA 22314

Dear Tina Namian:

On behalf of Oldways, a 501(c)3 educational nonprofit dedicated to inspiring people to embrace the healthy and sustainable joys of the old ways of eating, we support the move towards stronger nutrition standards, and would like to see the USDA FNS continue to move school meals in a nutritious direction. Specifically, we urge the USDA FNS to better align the **Child Nutrition Programs: Revisions to Meal Patterns Consistent with the 2020 Dietary Guidelines for Americans** with the whole grain recommendations outlined in the 2020-2025 Dietary Guidelines for Americans by increasing the minimum whole grain-rich threshold.

Specifically, we recommend one of two options:

- OPTION 1: Maintain the current whole grains requirement that at least 80 percent of the weekly grains offered are whole grain-rich, moving towards 100 percent whole grain-rich no later than SY 2027-2028.
- OPTION 2: Require that all grains offered must meet the 100 percent whole grain-rich requirement, EXCEPT: If on one day of the school week schools choose to offer enriched grains, the school must also have one day that week in which they serve grains that are 100% whole grain (not 100% whole grain-rich) to balance the weekly grain requirement to align with the recommendations of the Dietary Guidelines.

The USDA FNS's acknowledgment that "the 80 percent whole grain-rich standard does not fully meet the Dietary Guidelines" is a public health risk that we need not accept. The transitional standards keeping the whole grain requirement at 80 percent whole grain-rich were developed with the understanding that the "USDA is committed to its statutory obligation to develop school meal nutrition standards that are consistent with the goals of the latest Dietary Guidelines, and is committed to working toward this effort immediately following this rule." We are disappointed that the FNS chose to deviate from this rule in developing the new whole grain-rich standards, especially given the administration's multi-sector focus on healthy food environments for children in the White House National Strategy on Hunger, Nutrition, and Health.



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Public health change doesn't happen overnight, we appreciate that many of the nutrition proposals in these new standards are introduced in a gradual stepwise fashion (for example, slowly reducing sodium over time). However, when it comes to whole grains, it is unclear why there are no plans to align the whole grain requirements with the Dietary Guidelines for Americans, even a couple of years down the road. Since as early as 2005, the Dietary Guidelines for Americans have been recommending making at least half of our grains whole.

During listening sessions with stakeholders, the FNS reported that "participants generally supported increasing whole grains in the programs," and that "schools have been successful in meeting the whole grain-rich standards." The FNS also reported that "industry respondents shared their success developing a wide array of whole grain-rich products" and that "many public comments cited the importance of increasing whole grains in children's diets."

One priority that the new nutrition standards are meant to address is the "importance of encouraging meals that meet local and cultural preferences and ensuring the nutrition standards allow them." What often fails to make headlines, however, is that many whole grains have a rich history in diverse cultural food traditions and are well-received by young diners. For example, banana millet porridge is a popular dish in [A Children's Taste of African Heritage](#), a cooking and nutrition program for 8–12-year-olds, while [brown rice sushi](#) has been a hit at schools in the Midwest. Additionally, kid-friendly favorites like pasta, tortillas, and rice are among the many whole grain-rich foods available through the USDA foods program.

Both common sense and the USDA's own reports tell us that healthier school nutrition standards lead to healthier school lunches. According to the [School Nutrition and Meal Cost Study](#), published by the USDA FNS in April 2019, "updated nutrition standards for school meals have had a positive and significant influence on nutritional quality." Specifically, the nutritional score of school lunches "increased 41 percent—from 57.9 to 81.5 out of a possible 100" between the 2009-2010 school year and the 2014-2015 school year.

Additionally, the School Nutrition and Meal Cost Study found that students were significantly more likely to participate in the NSLP in schools that served the healthiest lunches, and that there was no significant difference in costs per lunch in schools with more versus less nutritious meals. Further, "studies that examined plate waste before and after implementation of the updated nutrition standards found that levels of plate waste were reduced or unchanged."

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Strengthening whole grain requirements in school meals may also help improve their environmental sustainability. In a [2022 study](#), using data from over 2.2 million real-world lunches, researchers found that “increasing whole grain requirements and providing serving size or frequency limits for beef” are the two most effective recommendations for reducing the environmental impacts of the National School Lunch program.

[Research](#) consistently demonstrates that repeated exposure to whole grains can shift both food preferences and eating habits in favor of whole grain foods. The FNS is in an extraordinary position to not only help properly fuel children’s growing brains and bodies, but also to help nurture students’ appetites for nutritious food, thereby laying the foundation for lifelong healthy habits. Thus, we urge policy makers to prioritize the health and wellbeing of the next generation, by continuing to provide school children with more whole grain-rich foods over time.

We thank the USDA and FNS for the opportunity to share our expertise on the proposed rule, and we look forward to learning more about how we can best support strengthening nutrition standards in schools.

Sincerely,



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