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January 24, 2018

Dear Chief Namian:

On behalf of Oldways, a 501(c)3 educational nonprofit dedicated to improving health through traditional dietary models, we are writing in opposition to the [Flexibilities for Milk, Whole Grains, and Sodium Requirements](#).

This interim final rule is an unnecessary threat to children's health, given that widespread evidence indicates that healthier school meals have actually [reduced plate waste](#) without [reducing school meal participation](#) in many districts. Despite false assumptions to the contrary, students today [are eating](#), and enjoying, whole grain foods. Relaxing nutrition guidelines that are already being met is a pointless exercise, and [September 2016 data](#) from the USDA show that the vast majority of school districts are certified as complying with the school nutrition standards. This includes 100% certification in states such as Alabama, Kentucky, and Mississippi — states that often don't receive acknowledgement for meeting nutritional guidelines.

This announcement comes at a particularly troubling time, as a November 2017 Harvard [study published](#) in the *New England Journal of Medicine* estimates that 57% of today's children will be obese by age 35. Our lunchrooms are a place to nurture students' appetites for healthy food and properly fuel their growing brains and bodies. Thus, we urge policy makers to prioritize the health and wellbeing of the next generation, and to not backpedal on existing successes.

Sincerely,

**Sara Baer-Sinnott**  
President, Oldways

**Kelly Toups, MLA, RD, LDN**  
Director of Nutrition, Oldways

**Cynthia Harriman**  
Director of Food and Nutrition Strategies, Oldways