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February 7, 2022

School Programs Branch  
Policy and Program Development Division  
Food and Nutrition Service

Dear Chief 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 are writing in support of the Transitional Standards for Milk, Whole Grains, and Sodium, with the understanding that “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.”

Although we are disappointed to see whole grain-rich requirements roll back from 100% whole grain-rich to 80% whole grain-rich for SY 2022-2023 and SY 2023-2024, we understand that the COVID-19 pandemic has presented unprecedented procurement and staffing challenges in schools, and that “making permanent changes in response to circumstances created by COVID-19 is not a viable long-term solution.” We wholeheartedly agree with USDA “that a return to stronger nutrition standards is imperative to support healthy eating and improved dietary outcomes” and we look forward to the “new rulemaking that comprehensively incorporates the updated Dietary Guidelines and nutrition science.”

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,<sup>i</sup> 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.

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. Further, while the School Nutrition and Meal Cost Study did not compare plate waste before and after the nutrition standards were changed, the study did report that other “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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School lunch offerings have the power to shape students' preferences and build healthy habits for the long-term. Studies show that it can take 8-15 exposures to a food before children begin to accept it,<sup>ii</sup> meaning what ends up in the wastebasket today may very well become a dietary staple down the road. We can't help children build healthy habits for the long-term if we're not giving them a chance to try these healthy foods in the first place. Further, widespread evidence indicates that healthier school meals have actually reduced plate waste<sup>iii</sup> without reducing school meal participation<sup>iv</sup> in many districts.

Research consistently demonstrates that repeated exposure to whole grains can shift both food preferences and eating habits in favor of whole grain foods.<sup>v,vi</sup> 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. We urge policy makers to prioritize the health and wellbeing of the next generation.

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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<sup>i</sup> Mathematica Policy Research in partnership with Abt Associates Inc, "School Nutrition and Meal Cost Study," United States Department of Agriculture Food and Nutrition Service, April 2019, [https://fns-prod.azureedge.net/sites/default/files/resource-files/SNMCS\\_Summary-Findings.pdf](https://fns-prod.azureedge.net/sites/default/files/resource-files/SNMCS_Summary-Findings.pdf).

<sup>ii</sup> Caitlin Daniel, "Economic constraints on taste formation and the true cost of healthy eating," *Social Science & Medicine* 148 (2016): 34-41.

<sup>iii</sup> Marlene B. Schwartz et al., "New School Meal Regulations Increase Fruit Consumption and Do Not Increase Total Plate Waste," *Childhood Obesity* 11 no. 3 (2015): 242-247.

<sup>iv</sup> Donna B. Johnson et al., "Effect of the Healthy Hunger-Free Kids Act on the Nutritional Quality of Meals Selected by Students and School Lunch Participation Rates," *JAMA Pediatrics* 170 no. 1 (2016):e153918.

<sup>v</sup> Angela De Leon et al., "Liking and Acceptability of Whole Grains Increases with a 6-Week Exposure but Preferences for Foods Varying in Taste and Fat Content Are Not Altered: A Randomized Controlled Trial," *Current Developments in Nutrition* 4 no. 3 (2020):nzaa023.

<sup>vi</sup> Allyson Radford et al., "Whole-grain intake in middle school students achieves dietary guidelines for Americans and MyPlate recommendations when provided as commercially available foods: a randomized trial," *Journal of the Academy of Nutrition and Dietetics* 114 no. 9 (2014):1417-23.