



266 Beacon Street, Suite 1 • Boston, MA 02116 • 617-421-5500 • OldwaysPT.org

January 23, 2020

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

Dear Chief 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 opposition to the Proposed Rules for Simplifying Meal Service and Monitoring Requirements in the NSLP and SBP.

Specifically, we oppose removing the daily grain requirements at breakfast, reducing the amount of fruit required to be served at breakfast outside of the cafeteria, and significantly reducing the amount of red and orange vegetables required in lunches each week in the National School Lunch Program (NSLP). Whole grains, fruits, and red and orange vegetables contain essential nutrients to help children's brains and bodies grow. By making room for less nutrient-dense foods like sausages, bacon, and potato products in their place, we are concerned that the nutritional quality of school meals will diminish, putting children at risk for nutrient deficiencies, obesity, and diet-related diseases. We are also concerned that by removing fiscal action for schools that repeatedly violate milk and vegetable requirements, the USDA is sending a clear signal to schools that they needn't worry about nutrition.

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,¹ 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.

While cost is often cited a perceived barrier to offering healthier lunches, the USDA study found that "there was no significant association between revenue as a percentage of reported cost and compliance with updated nutrition standards for NSLP lunches." In fact, there was no significant difference in costs per lunch in schools with more versus less nutritious meals.¹

¹ 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.



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The new draft guidance cites lower participation and increased food waste as reasons for backpedaling current nutrition standards. However, the USDA’s own data fail to support these widely repeated mischaracterizations. 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.”¹

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,² 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 waste³ without reducing school meal participation⁴ in many districts.

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.

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

Sincerely,

Handwritten signature of Sara Baer-Sinnott in blue ink.

Sara Baer-Sinnott
President, Oldways

Handwritten signature of Kelly Toups in blue ink.

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

² Caitlin Daniel, “Economic constraints on taste formation and the true cost of healthy eating,” *Social Science & Medicine* 148 (2016): 34-41.

³ 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.

⁴ 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.