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December 16, 2020

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

Dear Shawn Martin:

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 Restoration of Milk, Whole Grains, and Sodium Flexibilities. Specifically, we strongly oppose rolling back whole grain-rich requirements to only 50% of grain products.

The FNS's acknowledgment that "the proposed change would result in some decrease in whole grain-rich offerings, and children may not receive the same level of key nutrients associated with whole grain-rich items" is a public health risk that we need not accept. We are equally concerned by the reality that "schools choosing to offer only half of the grain offerings as whole grain-rich will likely reduce the amount of dietary fiber available to children, making it more challenging for schools to meet the DRI-target for dietary fiber for school meals."

The timing of this proposed rule is also troubling. Given that the National School Lunch Act "requires that school meals are consistent with the goals of the latest Dietary Guidelines for Americans," it is unclear why the FNS would choose to put forth a proposed rule only days before the 2020-2025 Dietary Guidelines for Americans are expected to be released to the public. We urge FNS to wait until after the 2020-2025 Dietary Guidelines for Americans are released before exploring changes to the school nutrition programs.

According to the interim final rule (Child Nutrition Programs: Flexibilities for Milk, Whole Grains, and Sodium Requirements), published on November 30, 2017, fewer than 15% of schools requested waivers for whole grains. The interim final rule also noted that "the availability of whole grain-rich products through USDA Foods and the commercial market has increased significantly since the implementation of the meal standards and continues to progress, providing new and affordable options for local operators to integrate into menus." The flexibilities outlined in the current proposed rule run contrary to the widespread evidence of whole grain-rich compliance and acceptance and ignore the majority of the 86,247 public comments opposed to these flexibilities.

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



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Cost Study,ⁱ 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.

The new proposed rule 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.”

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,ⁱⁱ 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 wasteⁱⁱⁱ without reducing school meal participation^{iv} 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.^{v,vi} 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, and to not backpedal on existing successes.

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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ⁱ 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.

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

ⁱⁱⁱ 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.

^{iv} 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.

^v 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.

^{vi} 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.