

February 21, 2023

Honorable Cindy Long
Administrator
United States Department of Agriculture, Food and Nutrition Service
Braddock Metro Center II
1320 Braddock Place
Alexandria, VA 22314

Submitted electronically to: <https://www.federalregister.gov/documents/2023/02/07/2023-02102/child-nutrition-programs-revisions-to-meal-patterns-consistent-with-the-2020-dietary-guidelines-for>

1. RE: FNS-2022-0043: Child Nutrition Programs: Revisions to Meal Patterns Consistent with the 2020 Dietary Guidelines for Americans

Dear Administrator Cindy Long,

The Colorado Children’s Campaign is pleased to provide the USDA Food and Nutrition Service comments in support of the proposed rule, FNS-2022-0043: Child Nutrition Programs: Revisions to Meal Patterns Consistent with the 2020 Dietary Guidelines for Americans.

The Colorado Children’s Campaign is a nonprofit, nonpartisan policy, research and advocacy organization committed since 1985 to realizing every chance for every child. We advocate for the development and implementation of data-driven public policies that improve child well-being in health, early childhood, family economic prosperity, and youth success. We do this by providing Coloradans with trusted data and research on child well-being and organizing an extensive statewide network of dedicated child advocates.

We appreciate the opportunity to make the following comments on this FNS proposed rule. We enthusiastically support the proposed rule and the updates it proposes to the Child Nutrition Programs and ask that the proposed rule be finalized in a timely manner.

Food security is a pillar in our health initiatives at the Children’s Campaign, especially as food security has continued to be a pervasive issue across our state. On average, between 2017 and 2019, 16% of Colorado kids lived in households that were food-insecure at some point during the year.¹ Throughout the pandemic, the share of Colorado households with kids where children were not eating enough because food was unaffordable ranged from 18% in June 2020 to a high of 37% in December 2021 – January 2022.² In November 2022, Colorado voters recognized the importance of school meals in mitigating food insecurity when they approved Proposition FF, the Healthy School Meals for All Program,

¹ [2022-KC-Final-Low-Res.pdf \(coloradokids.org\)](https://www.coloradokids.org/2022-KC-Final-Low-Res.pdf)

² Ibid.

which will provide free school meals to all public school students in Colorado starting in the 2023-2024 school year.³

For children living in food-insecure households, meals that they receive at school may be some of the only sources of nutrition that they consume in a day. New research shows that school meals have some of the highest quality of nutrients for children.⁴ A balanced nutritional diet contributes greatly to a child's development both inside and outside of the classroom. Therefore, it is imperative that school meal nutrition standards ensure that children are receiving the nutrition they need to thrive physically, mentally and emotionally.

The Children's Campaign strongly supports the proposed rule's quantitative limits for leading sources of added sugars in school meals, including for grain-based desserts, breakfast cereals, yogurt and flavored milk, as well as the weekly dietary limits on added sugars in school meals. Consuming too many added sugars can lead to an increased risk of obesity, type 2 diabetes and heart disease.⁵ Too many added sugars in one's diet has also been correlated to a higher risk of dental caries.⁶ According to the Dietary Guidelines for Americans (DGA) 2020-2025, Americans two years of age and older should keep their added sugar intake to less than 10% of their total daily calories.⁷ Currently for children aged 9 to 13, 79% of males and 78% of females are exceeding the recommended 10% limit on added sugars as part of their daily caloric intake.⁸ Also, non-Hispanic Black children on average have higher intakes of added sugars in their diets.⁹ The proposed rule mirrors the DGA 10% limit on added sugars, ensuring that school meals are up to the latest dietary standards to promote the health and well-being of students.

The Children's Campaign also strongly supports the proposed rule's gradual sodium reduction limits for school breakfast and lunch meals, each representing a 10% reduction. High sodium consumption is correlated to high blood pressure and hypertension, which can lead to an increased risk of heart disease and stroke.¹⁰ The latest DGA guidelines recommend a daily limit of 1,500 milligrams of sodium for children aged 5 to 8, a daily limit of 1,800 milligrams for children aged 9 to 13, and a daily limit of 2,300 for youth aged 14 to 18.¹¹ Approximately 90% of Americans aged two and older consume over these recommendations of sodium daily, which can lead to detrimental health impacts and increased health care costs.¹² While these proposed sodium reductions will still make it difficult for children to stay in the DGA's sodium limit recommendations, they represent progress that is much needed to ensure a better diet for students.

The Children's Campaign supports the proposed rule's alternatives for the milk standard, with no preference on either of the alternatives. Given the health benefits of milk for children, including being an important source of calcium and vitamin D, as long as kids are receiving milk options with their school

³ [Healthy School Meals for All Program | CDE \(state.co.us\)](#)

⁴ [School Meal Statistics - School Nutrition Association](#)

⁵ [Get the Facts: Added Sugars | Nutrition | CDC](#)

⁶ [Sugars and dental caries \(who.int\)](#)

⁷ [Dietary Guidelines for Americans, 2020-2025](#)

⁸ Ibid.

⁹ [Get the Facts: Added Sugars | Nutrition | CDC](#)

¹⁰ [Sodium | cdc.gov](#)

¹¹ [Dietary Guidelines for Americans, 2020-2025](#)

¹² [Sodium | cdc.gov](#)

meals, whether flavored or unflavored based on their preference, is what matters. We also support the proposed rule's whole grains requirement options, without a preference on either. Despite both options requiring less than half of grains being whole, which is not aligned with the DGA recommendations, we believe these proposals are both important steppingstones to ensuring that students receive better nutrition in their meals at school.

The Children's Campaign enthusiastically supports the additional proposals in the proposed rule. These include providing flexibilities for tribally operated schools, explicitly stating in regulation that traditional foods may be served in reimbursable school meals, continuing to allow schools to substitute vegetables for fruit at breakfast while also requiring schools that utilize in this option to offer a variety of vegetable subgroups, aligning National School Lunch Program snack standards for students children with the Child and Adult Care Food Program snack requirements, adding hummus to the list of foods exempt from the total fat standard in Smart Snack regulations, revising professional hiring standards for state child nutrition agencies and strengthening the Buy America provision. These proposed changes reflect steps taken to increase the representation of cultural diversity in nutrition for children and essentially "decolonize" our school meal standards to respect Indigenous and non-Western food cultures. The proposed changes also take steps to align fragmented snack standards from different programs, value direct experience just as much as postsecondary degrees for individuals working in state nutrition agencies and support American-based farmers and ranchers. The Children's Campaign centers equity in all our work, and these additional proposals represent significant progress to make our school meal standards, programs and agencies more equitable.

Roughly only 54% of children aged 0 to 18 are adhering to the dietary guidelines as developed by the FNS.¹³ The proposed rule would help school-aged children who rely on school meals as their source of nutrition during the school day better meet their dietary needs for healthy development. The percentage of students who eat school meals in Colorado will likely increase when Proposition FF is implemented; therefore, more families will be relying on and trusting school meals to provide proper nourishment for their children. The Colorado Children's Campaign strongly urges the FNS to finalize and adopt the proposals in the proposed rule so that students both in Colorado and nationwide can nourish their body and mind at school in ways that meet their dietary and cultural needs.

Respectfully submitted,

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¹³ [Dietary Guidelines for Americans, 2020-2025](#)