YOUR DISTRICT LETTERHEAD

Tina Namian

Chief, School Programs Branch, Policy and Development Division

4th Floor Food and Nutrition Service

1320 Braddock Place

Alexandria, VA, 22312

Re: FNS Docket No. ED-2022-0043, RIN 0584-AE88, Child Nutrition Programs: Revisions to meal patterns consistent with the 2020 Dietary Guidelines for Americans

Dear Ms. Namian,

As the superintendent of xxxx district, I write to share my thoughts on the proposed changes to the school nutrition standards regarding added sugars, sodium, whole grains and milk. While I appreciate the Department’s phased-in approach and recognition that change of this magnitude requires time, I am concerned with the overall impact of these new standards on student participation levels and the financial cost of these programs for my district.

We can all agree on the importance of students having the healthy meals they need to learn and grow. However, we must recognize that meals are only healthy when students eat them. Although I am apprehensive about the impact of the new added sugar limits, I realize that success here will rely mainly on vendors’ ability to produce the necessary products. My main concern is on the impact of the sodium limits. The sodium guidelines outlined in the proposed rule will force schools to serve unpalatable meals to students. As we’ve experienced in the past with the previous sodium reductions, student will opt to either not eat at all or bring low-quality food from home—undermining the entire purpose of the school meal programs to keep kids fed.

The school nutrition guidelines cannot push too far until the commercial palate changes. The unfortunate fact is that while cheap junk food exists—students will choose that instead of flavorless foods that schools offer. **I urge FNS to maintain the current sodium limit and not move forward with the new proposed rule to ensure our students continue to get the meals they need.**

Additionally, there are financial implications of these new standards that must be addressed. First, if participation decreases, the overall cost to the district increases. Second, transitioning to the new proposed standards will also require: purchasing new products that, if available, will likely be more expensive; and providing new training to staff which also takes new resources that my district does not have. Funding for school meals does not exist in a silo—it is part of our district’s overall budget. When school meals costs increase it will require me to reduce funding that target the academic, physical and social-emotional needs of students. The financial cost of the new standards must be recognized and addressed. FNS must work with Congress to ensure that the necessary funding is available to schools before the implementation of these standards begins.

Finally, regarding milk and whole grain regulations, I appreciate the opportunity to provide feedback. Instead of moving forward with one option for each category, I encourage FNS to allow districts the opportunity to choose which option they would like to use—allowing flexibility and local discretion for disctricts to determine what is best for their students and program.

Thank you for considering my views on this issue.

Superintendent XX