



Feeding Bodies. Fueling Minds.™

January 19, 2018

Tina Namian, Chief
School Programs Branch
Policy and Program
Development Division
Food and Nutrition Service
3101 Park Center Drive, 12th floor
Alexandria, Virginia 22302

ELECTRONIC MAIL

Dear Ms. Namian:

On behalf of the 57,000 members of the School Nutrition Association (SNA), we welcome the opportunity to comment on the publication of the *Interim Final Rule on Child Nutrition Programs: Flexibilities for Milk, Whole Grains and Sodium*, published in the Federal Register on November 30, 2017. SNA appreciates the Department's efforts to address the challenges school districts have confronted in transitioning to updated meal pattern requirements for the National School Lunch and School Breakfast Programs. While USDA's regulatory flexibilities have aided in this transition, overall, school districts look forward to a permanent solution eliminating the onerous management of temporary rules and, where allowed, annual waivers.

WHOLE GRAINS:

A recent SNA survey found that despite widespread efforts to increase student acceptance of whole grain foods, 65 percent of responding school nutrition directors reported continued challenges with the current whole grain mandates. A majority of school meal programs struggle with students' regional and cultural preferences for specific refined grains such as white rice, pasta, grits or tortillas.

The most effective solution is to restore the initial requirement that at least half of grains offered with school meals be whole grain rich. USDA's whole grain waivers have been a helpful interim step; however, several states do not readily offer the waiver to struggling schools, or have made the application process so cumbersome that schools overwhelmed by administrative duties are discouraged from applying. Overly burdensome requirements, including required documentation that some schools have no means to collect, have severely limited the availability of this much-needed regulatory relief. In addition, the waiver process consumes limited State Agency resources that would be better directed to providing technical assistance to school districts.

SODIUM:

Schools made significant progress in reducing sodium in school menus to meet Target 1 limits; however, a recent SNA survey revealed that 92 percent of responding school districts are concerned about the availability of foods that will meet future sodium limits and whether these will be acceptable by students. The Institute of Medicine warned that "reducing the sodium content of school meals as specified and in a way that is well accepted by students will present major challenges and may not be possible." (*School Meals: Building Blocks for Healthy Children, 2010*) Naturally occurring sodium present in meat, milk and other low-fat dairy foods will force

schools to take nutritious choices off the menu, and drive more students away from healthy school meals.

Given the lack of scientific evidence to support these sodium targets for children, the uncertainty regarding the long-term effects of lower sodium diets on child development and overall health, and differences in the scientific and medical communities on the appropriate recommendations for sodium consumption, **USDA should maintain Target 1 sodium levels and eliminate future targets.**

MILK:

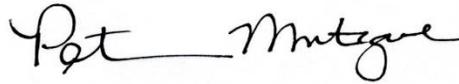
SNA continues to support student consumption of milk, which is a key source of protein and essential nutrients, and important to children's growth and development. Offering an additional low-fat milk option sends a positive message on milk's importance. Schools that choose to offer students this milk option should be required to continue to meet meal pattern limits on calories and saturated fat. By making this change as part of a final rule and eliminating exemption language, USDA will help streamline program operations.

As always, we appreciate the opportunity to comment and hope to continue partnering with the Department to support the children served by these critical nutrition programs.

Sincerely,



Dr. Lynn Harvey, RDN, LDN, FAND, SNS
President



Patricia Montague, CAE
Chief Executive Officer