

August 8th, 2022

Secretary Tom Vilsack
U.S. Department of Agriculture
219A Whitten Building
1400 Independence Avenue, SW
Washington, DC 20250

Dear Secretary Vilsack,

On behalf of the National Alliance for Nutrition and Activity (NANA) Steering Committeeⁱ, we thank you for your steadfast commitment to supporting schools in providing healthy meals, most recently demonstrated by the announcement of \$100 million through the Healthy Food Incentive (HFI) Fund. The NANA coalition has long championed improvements to the nutritional quality of school foods and led the effort to include the provision to update school meal standards and remove unhealthy foods and beverages out of school vending machines, a la carte lines and other school venues in the Healthy, Hunger-Free Kids Act (HHFKA). The HFI funds, coupled with the upcoming school meals durable rule anticipated early next yearⁱⁱ, present an opportunity to double down on the Agency's commitment to addressing nutrition insecurity by incentivizing and providing support to school food authorities (SFAs) to meet strong evidence-based nutrition standards aligned with the 2020 Dietary Guidelines for Americans (DGA).

Ensuring that students receive healthy, nutritious meals at school is more important than ever. Prior to the pandemic, schools were making immense progress towards the nutrition standards. The USDA's School Nutrition and Meal Cost Study (SNMCS), the only nationally representative study that assessed the nutritional quality and costs of producing school meals before and after implementation of the HHFKA, found significant improvements to the nutritional quality of school meals.ⁱⁱⁱ The SNMCS demonstrated that nutritional quality of reimbursable school breakfasts and lunches had significantly improved between school year SY 2009-2010 and SY 2014-2015 (updated standards were promulgated in 2012) based on mean total scores on the Healthy Eating Index (HEI)-2010.^{iv} Researchers estimate that for children in poverty, the risk of obesity declined substantially each year after implementation of HHFKA such that the risk of obesity would have been 47 percent higher in 2018 if the nutrition standards had not been updated.^v

The past several years have presented immense challenges to school districts related to providing healthy school meals. The rollbacks to the nutrition standards issued in 2018, followed by the Covid-19 pandemic and resulting supply and labor chain impacts, introduced uncertainty for SFAs and stalled progress towards meeting science-based nutrition standards. As a result, we have not reached full implementation of the 2012 standards, which were estimated to prevent more than two million cases of childhood obesity and save up to \$792 million in health-care related costs over ten years.^{vi}

In the past there were several key initiatives that supported and incentivized SFAs to improve the nutritional quality of their meals. We propose the Agency dedicate the HFI Fund to reinstate three successful initiatives, while expanding them to increase their efficacy and build the capacity of key stakeholders. Detailed recommendations follow:

1. Reinstate the *Healthier US Schools Challenge (HUSC)* or a similar national recognition program with awards for incremental progress and new funding opportunities for schools.

The *HUSC* incentivized healthier school environments and instilled pride and friendly competition in participating schools. We encourage the Agency to reinstate the *HUSC* with key modifications. To better

support districts that are struggling to meet nutrition standards, we encourage the Agency to consider an incentive structure that rewards incremental progress in addition to meeting the overall benchmarks of the *HUSSC*. For example, the *HUSSC*'s Bronze, Silver, Gold and Gold Award of Distinction could be coupled with awards and incentives for reducing sodium in meals by, for example, 5 percent, 10 percent, and 15 percent per year (or another timeframe). We are hopeful that the Agency's durable rule includes a limit on added sugars, and if it does, a similar incentive of incremental progress towards added sugars reduction could be included in this program. We also encourage emphasis – or building in an incentive – on ensuring that at least half of all grains offered are whole.

We applaud the USDA's efforts to help SFAs continue operations during the pandemic. Unfortunately, the pandemic has left many schools without resources to invest in strategies to improve the nutritional quality of school meals. We encourage the Agency to consider funding opportunities up front (in addition to reinstating the financial awards for meeting *HUSSC* benchmarks) for struggling schools. For example, the Agency could provide funds to schools of a certain income level or schools below a certain level of compliance with nutrition standards to be used explicitly for the purpose of improving nutritional quality (*i.e.*, hosting staff training on cooking techniques to reduce sodium, purchasing necessary kitchen equipment, etc.). Completion of such incentive and training could be coupled with a separate award upon successful completion and meeting a set goal.

2. Reinstate *Team Up for School Nutrition Success (Team Up)* trainings and work with states to deliver state-based trainings.

Regional *Team Up* trainings provided an essential opportunity for school nutrition directors to network and share best practices. Some states offered state-based versions of these trainings, which were able to reflect the unique cultural food preferences and, in some cases, were more convenient for SFA staff to attend. To improve the reach of future trainings, the Agency should work with state agencies to identify champions and come up with action plans to host state-based trainings regularly (such as annually). The Agency should also consider specific training modules and tools that SFA leadership can share with their staff at individual schools. These trainings should not only include more traditional topics like making a budget, meal planning, and nutrition standards, but also things like messaging and marketing.

3. Reinstate *What's Shaking? Creative Ways to Boost Flavor With Less Sodium* and a companion initiative focused on limiting added sugars.

What's Shaking? provided essential resources for SFAs on reducing sodium, including, critically, the science and evidence supporting the importance of reducing sodium to healthy, safe levels in children's diets. The durable rule presents an opportunity to provide certainty to SFAs about sodium (and hopefully added sugars) reduction requirements, which in turn can also provide industry a roadmap for reformulation. We were pleased to see that USDA already developed materials on addressing added sugars such as the [Best Practices for Reducing Added Sugars at School Breakfast](#) training guide, featured in Team Nutrition's Meal Talk: School Breakfast webinar earlier this year. The Agency has already developed a number of materials on sodium and whole grains. A clear landing page, like *What's Shaking?*, where SFAs can find all of the information they need about a topic (e.g., sodium, whole grains, added sugars), including educational materials that can be shared with teachers, parents, and students, is imperative. SFAs often cite a lack of understanding on the part of parents and students as barriers to gaining student acceptance of lower sodium items. Communications materials for families could encourage more awareness of sodium (and whole grains and added sugars) consumption beyond school meals. While the Institute of Child Nutrition does provide these kinds of materials, they are not publicly available and are not sorted by nutrient type. A one stop shop for challenges in meeting the nutrition standards streamlines access and availability of information.

4. Deliver robust technical assistance to states and SFAs on the use of meal pattern waivers.

We were pleased to see the USDA maintain the requirement that SFAs document supply chain or other hardship issues when using the meal pattern waivers for nutrition standards under the recent extension of waivers through SY 2022-2023. In February 2021, the Center for Science in the Public Interest highlighted best practices that state agencies reported providing to support SFAs.^{vii} We encourage the USDA to consider employing these strategies, as applicable, (e.g., webinars, toolkits, newsletters, etc.) emphasizing strategies to maintain compliance and prioritize nutrition when faced with supply chain or other hardships. We encourage the USDA to engage in robust technical assistance efforts, both independently and through all of these aforementioned initiatives.

We again thank you for your ongoing support of school nutrition programs and appreciate your consideration of these recommendations. We urge that the HFI Funds prioritize supporting SFAs with sodium and added sugars reduction, as well as offering whole grains.

Sincerely,

Academy of Nutrition and Dietetics

Association of State Public Health Nutritionists

American Academy of Pediatrics

Center for Science in the Public Interest

American Cancer Society Cancer Action Network

National Association of Chronic Disease Directors

American Heart Association

National WIC Association

American Public Health Association

International Fresh Produce Association

ⁱ The National Alliance for Nutrition and Activity (NANA) is the nation's largest nutrition advocacy coalition consisting of over 500 national, state, and local organizations. NANA envisions a country where everyone has access to adequate, affordable, culturally appropriate, and nutritious food; where the food environment promotes healthy eating; in which evidence-based nutrition policy is the basis of food policies and programs; and in which physical activity is promoted. For more information, please go to: www.NANACoalition.org.

ⁱⁱ The USDA announced rulemaking for updating the school meal nutrition standards consistent with the 2020 Dietary Guidelines for Americans (known as the "durable rule"), anticipated release January 2023: <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202204&RIN=0584-AE88>.

ⁱⁱⁱ Fox MK, Gearan E. *School Nutrition and Meal Cost Study Summary of Findings*. U.S. Department of Agriculture Food and Nutrition Service. April 2019. https://The.USDA-prod.azureedge.net/sites/default/files/resource-files/SNMCS_Summary-Findings.pdf

^{iv} The HEI-2010 is a measure of nutritional quality based on the 2010 Dietary Guidelines for Americans.

^v Kenney EL, et al. Impact Of The Healthy, Hunger-Free Kids Act On Obesity Trends. *Health Aff*. 2020;39:1122–1129.

^{vi} Gortmaker SL, et al. Three Interventions that Reduce Childhood Obesity Are Projected to Save More Than They Cost to Implement. *Health Aff*. 2015;34:1932-9.

^{vii} Center for Science in the Public Interest. *Implementation of COVID-19 meal pattern waivers: Best practices and comparisons by state*. February 2021. <https://www.cspinet.org/resource/implementation-covid-19-meal-pattern-waivers-best-practices-and-comparisons-state>