



April 20, 2020

Pam Miller, Administrator
U.S. Department of Agriculture's (USDA)
Food and Nutrition Service (FNS)
School Programs Branch
Policy and Program Development Division
1320 Braddock Place, 4th Floor,
Alexandria, Virginia 22314

RE: Comments on National School Lunch and School Breakfast Programs

Dear Administrator Miller,

Trinity Health appreciates the opportunity to offer comments on The **Food and Nutrition Service** (FNS) Proposed Rule: Simplifying Meal Service and Monitoring Requirements in the National School Lunch and School Breakfast Programs. Our comments and recommendations reflect a strong interest in advancing the health of our communities, of which food and nutrition is an integral component.

Trinity Health is one of the largest multi-institutional Catholic health care delivery systems in the nation, serving diverse communities that include more than 30 million people across 22 states. Our People-Centered Health System puts the people we serve at the center of every behavior, action and decision. This brings to life our commitment to be a compassionate, transforming and healing presence in our communities. Trinity Health includes 94 hospitals as well as 109 continuing care locations that include PACE, senior living facilities, and home care and hospice services. Our continuing care programs provide nearly 2.5 million visits annually. Committed to those who are poor and underserved, Trinity Health returns \$1.1 billion to our communities annually in the form of charity care and other community benefit programs. We have 35 teaching hospitals with graduate medical education (GME) programs providing training for more than 2,000 residents and fellows in 184 specialty and subspecialty programs. We employ approximately 133,000 colleagues, including more than 7,800 employed physicians and clinicians, and have more than 15,000 physicians and advanced practice professionals.

New Proposed School Standards

Trinity Health strongly opposes the USDA's proposal to further weaken school nutrition standards that serve millions of American children. If finalized, this rule would jeopardize the progress schools have made to provide healthier food to children. It would allow students to choose pizza, French fries, and cookies in place of a balanced reimbursable meal for lunch every day and reduce access to fruits in some breakfasts and to a greater variety of vegetables in lunches.

School meals should support children's health and help cultivate life-long healthy eating habits. Trinity Health is concerned that your proposal would decrease school meal participation and school

revenue, and increase stigma toward the students who receive free or reduced-priced meals. Further, French fries are already common on school menus, and the proposed rule could result in an additional three cups of French fries per week and reduce access to a variety of other vegetables. It also could result in kids getting only juice for breakfast in the classroom rather than whole fruit, when according to the Dietary Guidelines for Americans, children do not or barely meet recommended amounts of fruit and overconsume fruit juice.

USDA's own data from the School Nutrition and Meal Cost Study found that the nutritional quality of school meals has significantly increased, participation is highest in schools with the healthiest meals, and plate waste has not increased as school meals have become healthier. This proposal would undermine this progress. Rather than weakening school nutrition requirements to appease the food industry, Trinity Health urges the USDA to put the health of kids first.

Trinity Health supports the American Heart Association's response to the USDA's proposed rule "Simplifying Meal Service and Monitoring Requirements in the National School Lunch and School Breakfast Programs (NSLP/SBP). A study published in the American Dietetic Association¹ found that not only did school meals get healthier but more kids ate the new school menus. It had a positive domino effect as even kids who brought lunch from home had healthier food than they did before. Breakfast scores as measured by the Healthy Eating Index (HEI) rose from 50% to 70% and lunch scores rose from 58-82% after implementation. Healthy eating habits must continue to be positively influenced at school.

Researchers found that with the implementation of the 2013-14 standards, the whole grain to total grain ratio of school foods surpassed other sources, including home prepared meals. While only 23% of students choose to eat whole grains from school foods prior to the 2013-2014 change, 49% did thereafter. Changing this requirement moving forward does not make sense when we know that whole grains promote a healthy gastrointestinal tract, help us to stay fuller longer, lower LDL cholesterol and improve blood sugar levels.

Rolling back rules that have provided for a healthier meal that schools have grown accustomed to is not logical. The goal of the nutrition standards that were implemented during the 2012-2013 academic year was intended to bring school breakfast and lunch menus in alignment with the dietary guidelines to help fight obesity and other diseases linked to poor dietary choices. Proposed changes will allow schools to serve fewer fruits and grains, a smaller variety of vegetables and less healthful entrée's that are not part of a well-balanced meal.

According to the Centers for Disease Control (CDC)², just 9% of high school students meet the fruit recommendation and only 2% meet the vegetable recommendation. The recommendation by this government body: "As part of a healthy food environment, fruits and vegetables need to be accessible and affordable in places where children and families spend time. Students spend at least 1/3 of their day in school. We must make this time contribute towards improving both their health and health habits. Failure to make the healthier choice the easier choice will only compound the prevalence of childhood obesity in the United States. According to the CDC³, children and

¹ [https://jandonline.org/article/S2212-2672\(19\)31557-6/fulltext](https://jandonline.org/article/S2212-2672(19)31557-6/fulltext)

² <https://www.cdc.gov/nutrition/downloads/fruits-vegetables/2018/2018-fruit-vegetable-report-508.pdf>

³ <https://www.cdc.gov/obesity/data/childhood.html>

adolescents aged 2-19 years the prevalence of obesity is 18.4% among 6 to 11-year-old and 20.6% among 12 to 19-year-old.

Providing healthy food in schools is so important. Research shows that improved nutrition in schools leads to increased focus and attention, improved test scores and better classroom behavior. Access to healthy food in schools is especially important for students from underinvested communities, the majority of whom are students of color, where healthy foods may not be widely available. Research has demonstrated that providing breakfast at school has a direct correlation to improved performance specifically in math and reading scores and allows children to be more fully present as their attention is not disrupted by hunger. The proposed fruit standards allow as little as ½ cup or a 50% reduction in the current requirements. The nutritive value of the first meal of the day is further eroded by eliminating the requirement to serve whole grains at breakfast. This leaves a positive option of low-fat dairy (milk, cheese, yogurt) and poor choice of high sodium and saturated fat breakfast meats (sausage, bacon, ham) in addition to peanut butter and eggs as dominant breakfast offerings. More Americans that not are lactose intolerant and breakfast meats (bacon, sausage, ham) are Group 1 carcinogens to humans as identified by the International Agency for Research on Cancer. These proposed changes to the USDA breakfast guidelines for schools move us in a direction counter to evidenced based nutrition for children as well as adults.

A change to the vegetable sub group requirement eliminates the need to serve as many red and orange vegetables and legumes. Again, the recommendation to wide variety of many-colored vegetables to enhance the consumption of phytochemicals is wrong. Corn, potatoes and other starchy vegetables that are often fried, sauced or gravied is not a suitable replacement. Finally, allowing entrees to be served ala carte does nothing to teach our children about the importance of a balanced plate offering. While pizza or macaroni and cheese can be part of a balanced meal when accompanied by a side of fruit, salad or low-fat milk, three servings of pizza or macaroni and cheese chosen ala carte does nothing to help guide our children into creating a healthy plate.

While the USDA contends that these changes are necessary to mitigate food waste, there is no evidence or studies suggesting that food waste increased when school nutrition standards were updated. Reducing food waste is a goal everyone should share and is a worthy goal learned at a young age. Children (and adults) are like to play with their food. Cutting fruits and vegetables into interesting shapes and serving with low fat dip rather than serving whole reduces food waste. Whole grains have been accepted and we need to continue to incorporate them into breakfast and lunch recipes. Our meals at school need to contribute to, not take away from our children's overall health.

Trinity Health as one of its core values has “a commitment to those who are poor: we stand with and serve those who are poor, especially those most vulnerable.” Obesity impacts vulnerable populations – specifically vulnerable children – at a higher rate than the population overall. Trinity Health is a committed partner in its communities and works to advance programs to prevent and reduce obesity in children and adults.

Trinity Health strongly opposes the USDA’s proposal on school nutrition standards that serve

millions of American children. If finalized, this rule would jeopardize the progress schools have made to provide healthier food to children. We urge you not to implement these changes. Thank you for the opportunity to offer comments on the. If you have questions on our comments, please feel free to contact Tonya Wells at wellstk@trinity-health.org or 734-343-0873.

Sincerely,

George Cranmer
Vice President, Food & Nutrition Division/Support Services

Tonya K. Wells
Vice President, Social Impact Investing & Community Development