



April 21, 2020

School Programs Branch
Policy and Program Development Division
Food and Nutrition Service
U.S. Department of Agriculture
1320 Braddock Place, 4th Floor
Alexandria, VA 22314

RE: Docket No. FNS-2019-0007; Simplifying Meal Service and Monitoring Requirements in the National School Lunch and School Breakfast Programs

Dear School Programs Branch:

Virginia PTA appreciates the opportunity to comment on the U.S. Department of Agriculture's (USDA) "Simplifying Meal Service and Monitoring Requirements in the National School Lunch and School Breakfast Programs" proposed rule (85 FR 4094).

Research shows that the school food environment is associated with youth dietary behaviors and obesity and that schools play a critical role in supporting the healthy behaviors that parents strive for in their homes. In Virginia 1.3 million students participate in the National School Lunch Program and 45.59% of our students are eligible for free or reduced price lunches.

This January our membership which represents 165,000 parents, educators and students across 1,000 Virginia schools specifically discussed school nutrition and the impact of selling ala carte foods that compete with the federally reimbursable school meal program. We voted unanimously in favor of the discontinuation of competitive ala carte sales during school hours. When foods are offered for ala carte sales, it encourages students to purchase only those items in replacement of a full meal or they may supplement their meal in a way that undermines the integrity of the Dietary Guidelines for Americans (DGAs) and may contribute to childhood obesity.

Food consumed at school can make up half of a child's daily calorie intake. Children from families with low incomes are less able to access healthy foods at home and rely on school meals as a primary source of nutritious food. It's important that these meals not be treated as a snack by encouraging ala carte sales and that we strive to reduce the stigma that can arise when some children are able to purchase supplemental entrees or ala carte items and others are not.

Contrary to the rationale for some of the rule changes, the USDA's 2019 School Nutrition and Meals Cost study affirmed what many of us observe in our school cafeterias, that there is greater participation in school meal programs that meet the highest healthy food standards and that food waste has been relatively unchanged as a result of the Healthy, Hunger-Free Kids Act.

Child nutrition standards remain the same regardless of where the food is served, whether in the cafeteria, in a classroom, through a summer meals program or through a COVID-19 emergency response meal. Now, more than ever, we must ensure that our students have access to well balanced, healthy meals that meet their calorie and nutritional needs. We ask that you:

- Restrict ala carte sales that compete with the school meal program
- Maintain the current regulations that require schools to offer meals and a vegetable variety that meets the nutritional requirements for the age/grade group of each student. School building size and grades served shouldn't place students in a position where they are expected to determine their own calorie needs by asking for a larger portion or spending money for supplemental ala carte food.
- Maintain the 1 cup fruit serving for School Breakfasts served outside the cafeteria. Reducing the serving to a half of a cup is inconsistent with the Dietary Guidelines for Americans and could fail to provide needed nutrients for low income students who rely on the School Breakfast Program to start a productive academic day.
- Continue to guarantee that children receive a school meal that offers a full array of vegetables, including often under-consumed red and orange vegetables and the other vegetables category for grades 9-12, which includes cucumbers, cauliflower, and avocados. Vegetable flour pasta is not a substitute for whole vegetables.

Virginia PTA members strongly support an expansion of opportunities to serve fresh, locally grown or raised fruits, vegetables, grains and proteins as part of the school meals program as well as work that expands school garden learning opportunities. We urge you to increase the development of local procurement chains that support rural economic development and build strong Farm to School partnerships. These relationships benefit the health of our students and our local economies.

Thank you for the opportunity to comment and for the rigorous care you offer in helping children develop the healthy eating habits that have a positive impact on school performance and support life-long healthy eating choices.

Sincerely,

Jenna Alexander

Jenna Alexander
VP Advocacy, Virginia PTA

Donna Colombo

Donna Colombo
President, Virginia PTA