



October 25, 2013

William Wagoner
Section Chief, Policy and Program Development Branch
Child Nutrition Division
Food and Nutrition Service
U.S. Department of Agriculture
P.O. Box 66874
Saint Louis, MO 63166

Re: National School Lunch Program and School Breakfast Program: Nutrition Standards for All Foods Sold in School as Required by the Healthy, Hunger-Free Kids Act of 2010 Interim Final Rule (Docket ID: FNS-2011-0019)

Dear Mr. Wagoner:

Trust for America's Health (TFAH), a nonprofit, nonpartisan organization dedicated to saving lives by protecting the health of every community and working to make disease prevention a national priority, strongly supports the interim final rule for nutrition standards for all food sold in school and respectfully submit the following comments for your consideration.

Food consumed during the school day plays a significant role in children's diet and constitutes the majority of daily calories consumed for many students. Therefore, this rule, once fully implemented, will be a fundamental step towards addressing the epidemic of childhood obesity, and improving the long-term health of America's children. According to TFAH's 2013 report *F as in Fat: How Obesity Threatens America's Future*, childhood obesity rates are greater than 17 percent across the country.¹ And millions more children are overweight.

This rule arrives at a critical time for our nation's health. This interim final rule represents the first update to nutrition standards for school snacks and beverages in more than 30 years. Over that same period, we have seen childhood obesity rates triple. Addressing the nutritional value of food served in our nation's schools is a critical opportunity to address our obesity epidemic and reinforce healthy eat habits.

We are pleased that the interim final rule supports many of the recommendations we made in our April 2013 comments to USDA on the proposed rule. Specifically, we hope that the nutrition standards put forth in the interim final rule will continue to apply to all foods and beverages sold through the school day (including 30 minutes after school instruction ends) across the entire school campus. For this reason, we would urge USDA to not expand the a la carte exception for

¹ Trust for America's Health. *F as in Fat: How Obesity Threatens America's Future*. Washington, D.C.: Trust for America's Health, 2013.

any additional food or beverage items, including for any side dishes sold as part of the meal program. Unless there are consistent standards across the school day and environment, we will end up undermining the effectiveness of these important standards.

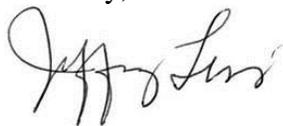
We similarly commend USDA for using a food-based approach to ensure foods sold outside of meals contribute positively to diets by being a fruit, vegetable, whole grain, low-fat dairy, or protein. By emphasizing foods that make a meaningful contribution to a healthful diet, the proposed regulations stay true to the basic premise of the *Dietary Guidelines for Americans*: that nutrient needs should be met primarily by consuming nutrient-dense foods.

As we also noted in our April 2013 comments, TFAH also supports the requirement that schools provide potable water at no charge during meal service. This requirement is a simple, yet effective obesity-prevention strategy. Water provides zero calories and is a healthy alternative to sugary drinks. The Surgeon General has promoted water consumption in schools as a tactic for combating obesity and supporting healthier choices.²

Thank you again to USDA for issuing a timely interim final rule establishing these important, common sense standards and for this opportunity to comment. Improving the health of America's children will require collaboration between all sectors of society in order to reduce barriers to healthy eating and active living, and this interim final rule represents a significant step forward in our efforts to make it easier for our children to make healthy eating choices.

We hope that our comments will assist the USDA in fully implementing nutrition standards for the school meal programs. If you have any questions, please do not hesitate to contact our Government Relations Manager, Jack Rayburn, at (202) 223-9870 ext. 28, or via email at jrayburn@tfah.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey Levi". The signature is fluid and cursive, with the first name "Jeffrey" being larger and more prominent than the last name "Levi".

Jeffrey Levi, Ph.D.
Executive Director

² U.S. Surgeon General. *The Surgeon General's Vision for a Healthy and Fit Nation*. Washington, D.C.: HHS, 2010.