January 26, 2018

School Programs Branch
Policy and Program Development Division
Food and Nutrition Service, USDA
3101 Park Center Drive
Alexandria, Virginia 22302

Re: Docket No. FNS-2017-0021; Child Nutrition Programs: Flexibilities for Milk, Whole Grains, and Sodium Requirements

The Colorado Health Foundation strongly opposes this proposal to further delay sodium reduction targets, to extend a waiver for whole-grains requirements and to allow flavored low-fat milk in the National School Lunch (NSLP) and School Breakfast Programs (SBP). We believe these proposed changes are not in the best interest of Colorado’s students and that they would undermine the hard work Colorado’s schools are already doing to improve their meal programs.

Over the course of the last several years, Colorado schools have worked diligently to provide healthier meals to students in order to help improve the health of children, to help fight hunger and to reduce childhood obesity. In Colorado, nearly 400,000 students participate in school meal programs, and this number has been steadily growing each year. As in many states across the nation, hunger and childhood obesity are major concerns for Colorado. More than 80 percent of children that participate in the National School Lunch and School Breakfast programs in Colorado receive them for free or at a reduced price. For these low income students, school meals are often a primary source of balanced nutrition. Strong standards for the quality of these meals are essential to ensuring that Colorado’s children are hunger-free and healthy.

Many children consume up to half of their daily calories during the school day, giving our nation’s schools an important role in the fight against childhood obesity and hunger. Limiting the amount of calories children consume daily through flavored milk, eliminating unnecessary added sodium and encouraging the consumption of whole grains are important strides schools are already well on their way to making to support healthy eating and comprehensive nutrition among their students. School nutrition directors and staff have already been working hard for several years to comply with federal nutrition standards, designing menus and food offerings that meet the current guidance. Preserving these existing rules would provide students with healthy, balanced meals. Changing the rules now, after years of planning and implementation, would create unnecessary disruption and confusion for schools and ultimately harm the health of students.

The Colorado Health Foundation is the state’s largest private foundation and works closely with schools and communities to advance our vision of bringing health in reach for all Coloradans. We strongly oppose these proposed changes to school meal programs because we believe they would harm the health of Colorado’s children and undermine years of hard work that our schools have been doing to support their students.

We thank you for the opportunity to provide comments and encourage the USDA to continue to provide thoughtful leadership to improve the nutrition standards for school meals. Colorado students deserve the opportunity to have high-quality and nutritionally balanced school meals.
Should you have any questions about our comments, please contact Sara Monge, public policy officer at the Colorado Health Foundation, at smonge@coloradohealth.org or 303.953.3664.

Sincerely,

Kyle Legleiter
Senior Policy Officer
Colorado Health Foundation