



COALITION ON HUMAN NEEDS

1825 K Street, NW · Suite 411 · Washington, DC 20006 · 202.223.2532 · Fax 202.223.2538 · www.chn.org

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CHN Submits Comments to USDA in Response to Proposed Rule that Would Roll Back Nutrition Standards for School Meals

Ms. Namian:

I am commenting on behalf of the Coalition on Human Needs, an alliance of organizations representing human service providers, people of faith, labor, civil rights, and policy expert groups, and other advocates focused on meeting the needs of people with low incomes. Our members represent many thousands of people nationwide. We urge you to withdraw the rule to continue the rollback of healthy nutrition standards for school meals. This rule will make permanent weaker nutrition standards for whole grains, sodium, and milk.

We are particularly concerned that you would once again attempt to overturn sound nutritional standards during this period of alarming increases in food scarcity. The most recent findings from the U.S. Census Bureau's Household Pulse Survey (covering the period of November 25-December 7) show extremely high proportions of adults living with children reporting that their households "sometimes or often did not have enough to eat" in the preceding 7 days. That was true of 17.5 percent of all adults living with children (14.3 million people). Because communities of color are disproportionately poor and have been disproportionately affected by COVID-19, about one in four Hispanic and Black people in households with children did not have enough to eat in the previous week. Nearly one in four (23.6 percent) in households where children get free school meals said they sometimes or often did not have enough to eat.

We emphasize this point because inability to afford enough food makes it all the more important that school meals are as nutritious as possible. It is well known that families struggling with poverty are forced to rely on foods with more empty calories and sodium. School meals should protect children's health by offering something better.

There is considerable research showing how important adequate nutrition is for children's healthy development and school performance. At a time when it is especially difficult for children in families with low incomes to manage school, children should not have to face the additional difficulty of inadequate nutrition. School meals should be consistent with the Dietary Guidelines for Americans, including serving whole-grains and limiting sodium and fat.

Please withdraw this proposed rule and in addition extend the comment period to 60 days, so more people have the opportunity to comment. When comments were sought when USDA first tried to impose this rollback of standards, over 90 percent of those commenting opposed such a move. Now, when schools have had the opportunity to meet the standards with success, it is both unnecessary and harmful to children to roll them back.

