

January 25, 2018

Tina Namian, Chief
School Programs Branch
Policy and Program Development Division
Food and Nutrition Service
P.O. Box 2885
Fairfax, VA 22031-0885

Dear Ms. Namian,

The American Commodity Distribution Association (ACDA) appreciates the opportunity to submit the following comments in support of the Interim Final Rule entitled “**Child Nutrition Programs: Flexibilities for Milk, Whole Grains, and Sodium Requirements**” as published in the November 30 edition of the Federal Register. We strongly support¹ extending through school year 2018–2019 these menu planning flexibilities in the National School Lunch Program (NSLP); the School Breakfast Program (SBP); the Special Milk Program for Children (SMP); and the Child and Adult Care Food Program (CACFP), and look forward to the final rule this fall for implementation in SY 2019–2020. Our members – recipient agencies, state agencies, and industry – work hard each day to provide the best possible meals to our nation’s children. We want to provide wholesome meals that will be sought out by all students, and respect the different needs and preferences that result in successful programs around the country.

Sodium –

ACDA appreciates and has supported efforts to provide flexibility in school meal programs in each of the past several years for which such flexibility has been offered. This rule retains Sodium Target 1 as the regulatory limit in the NSLP and SBP through the end of SY 2018-2019, and anticipates retaining Target 1 in the final rule through at least the end of SY 2020-2021.

ACDA supports the interim rule, and urges reviewing the Target 2 sodium standard contingent upon the latest scientific research indicating that further reduction in sodium is necessary to safeguard the health of children.

During our annual meeting in Salt Lake City, Utah held May 3-5, 2015, we benefitted from presentations made by Dr. Cheryl Anderson of the University of California, San Diego, who was a lead member of the Dietary Guidelines Advisory Committee (DGAC) with respect to the development of the sodium standards recommendations. We also received a presentation from Dr. Robert P. Heaney of the Creighton University Osteoporosis Research Center. These two experts provided differing views regarding the recommended sodium standards.

Both cited the May 14, 2013 report of the Institute of Medicine saying that there is no evidence that reducing the intake below 2300 mg per day is beneficial. Dr. Anderson reported that the 2015 DGAC determined that, based on the two new studies identified in the updated search, changes were not warranted to the 2010 DGAC conclusion statement or grade. She went on to say that neither of the two studies identified in the update found a relationship between dietary sodium intake and blood pressure in healthy, normotensive children.

¹ <https://www.gpo.gov/fdsys/pkg/FR-2017-11-30/pdf/2017-25799.pdf>

Dr. Heaney discussed other studies that suggest "...the 2010 Dietary Guidelines for sodium were incompatible with potassium guidelines and with nutritionally adequate diets."² He also cited another study questioning the link between cardiovascular disease and sodium intake.³ Finally, he cited a recent study by Boston University finding that salt had no long-term effect on blood pressure.⁴

We agree that the sodium standard issue should be reviewed as part of the 2020 Dietary Guidelines for Americans, and any further modification in sodium standards for school meals should await that determination.

Whole Grains –

We also appreciate the whole grain flexibility because various regions continue to experience problems with specific items such as pasta, bagels, grits, biscuits, and tortillas. These food items are difficult to obtain as whole grain rich products or are not readily accepted by students. Within your Federal Register notice you rightly point out that the development of these products is time consuming and expensive, and responsibly requires consumer acceptability testing to ensure that these products will be well received.

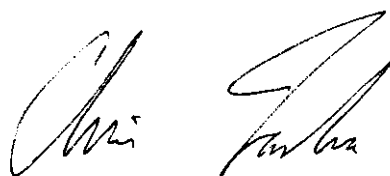
School Food Authorities routinely begin to ask for samples or test new products before ordering, so sufficient lead time is essential – especially with respect to the ordering of USDA Foods that is routinely done well in advance of the actual school year.

Dairy –

ACDA supports the rule that allows program operators in the NSLP, SBP, SMP, and CACFP (the Child Nutrition Programs (CNPs)) the option to offer flavored, low-fat (1 percent fat) milk as part of a reimbursable meal for students in grades K through 12, and for SMP and CACFP participants 6 years of age and older. Schools may also offer flavored, low-fat milk as a competitive beverage for sale. This optional flexibility expands the variety of milk in the CNPs and may encourage children's consumption of fluid milk nationwide. While the existing flexibility authorized under section 747(c) of the Consolidated Appropriations Act, 2017, allowed State agencies the discretion to grant SFAs exemptions allowing service of low-fat flavored milk, individual states had discretion to not allow exemptions and if they did allow exemptions schools had to demonstrate hardship by documenting a reduction in student milk consumption.

Again, we thank you for the opportunity to offer these comments, and look forward to continue working with you to enhance the quality and substance of the nutrition standards that serve as the basis for USDA's food programs.

Sincerely,

The image shows two handwritten signatures in black ink. The signature on the left is cursive and appears to read 'Chris Facha'. The signature on the right is also cursive and appears to read 'Facha'.

Chris Facha
President

² Maillot, Monsivais, & Drewnowski, Nutrition Research, 2013

³ O'Donnell et al. New England Journal of Medicine, 2014

⁴ "Longitudinal Effects of Dietary Sodium and Potassium on Blood Pressure in Adolescent Girls", JAMA Pediatrics, April 27, 2015, <http://archpedi.jamanetwork.com/article.aspx?articleid=2272973&resultClick=3>