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May 10, 2023

Tina Namain
School Meals Policy Division – 4th Floor
Food and Nutrition Service
1320 Braddock Place
Alexandria, VA 22314

Re: Docket ID No: FNS-2022-0043-0001 Child Nutrition Programs: Revisions to Meal Patterns Consistent with the 2020 Dietary Guidelines for Americans

The National Association of State Departments of Agriculture (NASDA) appreciates the opportunity to submit comments on the United States Department of Agriculture's proposed rule regarding Child Nutrition Programs: Revisions to Meal Patterns Consistent with the 2020 Dietary Guidelines for Americans.

NASDA Overview

NASDA represents the commissioners, secretaries, and directors of the state departments of agriculture in all 50 states and 4 U.S. territories. State departments of agriculture are responsible for a wide range of programs, including food safety, combating the spread of disease, and fostering the economic vitality of our rural communities. Because agriculture leads the way for a healthy and resilient world, NASDA members are committed to representing the interests of everyone in the food supply chain who work every day to provide life's necessities at affordable prices and in a healthy, sustainable manner.

Comments Regarding Proposed Milk Revisions

Child Nutrition Programs, such as the School Breakfast Program (SBP) and the National School Lunch Program (NSLP), serve as important sources of nutritious meals, helping to support positive development and health outcomes for children while combatting food insecurity. NASDA members, who have close ties to the safety, production, and marketing of food, have long supported NSLP and SBP guidelines that support individual needs and ensure that students consume sufficient nutrients to support healthy growth and mental alertness.

In reviewing the proposed revisions to child nutrition programs pertaining to fluid milk, NASDA opposes “Alternative A”, which would prohibit any flavored milk options for elementary or

junior high school students. Under this alternative, only high school students would have the ability to make the choice of what beverage they prefer to consume.

NASDA members recently met to discuss policy on this issue and adopted the following principals which we believe should guide USDA's thinking on school nutrition:

- NASDA believes milk in our schools is critical to child nutrition. No other food or beverage provides the unique combination of nutrients milk provides for children. Milk provides thirteen essential nutrients children need to stay healthy and thrive in school.
- NASDA recognizes children and adolescents over four years old are not consuming enough dairy to meet the recommendations in the federal Dietary Guidelines for Americans. Milk is foundational to a healthy meal for school children and the USDA should take action to ensure children have access to nutritious flavored and unflavored milk.
- NASDA believes every school participating in the National School Lunch program should offer students at least one flavored milk option.
- NASDA opposes any effort by USDA or any other entity to deny children the opportunity to choose flavored milk for their school meals.

Given the unique benefits found in milk, we strongly support students retaining the option to choose flavored milk for their school meals.

In 2020, the federal Dietary Guidelines Advisory Committee report found that 79 percent of 9- to 13-year-olds are not meeting the recommended intake of dairy foods. This figure is concerning given the unique nutrient profile that milk offers that can be found in no other food and beverage. This unique combination of thirteen essential nutrients includes potassium, calcium, and vitamin D, all of which are critical for supporting healthy development.

The Dietary Guidelines for Americans (DGA) recommends that individuals two years and older should consume two-to-three cups of dairy per day, depending on age and calorie level of dietary pattern. Although no age group meets this recommendation, children come the closest, largely due to consumption that happens at school according to the USDA Economic Research Service. Access to palatable options is a key component of ensuring that progress toward meeting the DGA is maintained.

We acknowledge the importance of limiting added sugars to a child's diet to support healthy development and reduce diet-related conditions. However, flavored milk has been found to only contribute four percent of added sugar to children's diets. Given that elementary student milk

consumption drops by an average of 35 percent when flavored milk is eliminated, the benefits provided by milk's nutrient profile outweigh the marginal added sugar.

Conclusion

NASDA appreciates USDA's work in promoting healthy development and long-term outcomes through their child nutrition programs, and state departments of agriculture look forward to our continued partnership as we work together on these important issues. Should you have any questions, please contact Josie Montoney-Crawford at josie.montoney-crawford@nasda.org. Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Ted A McKinney". The signature is fluid and cursive, with "Ted A" on top and "McKinney" below it, ending with a large, sweeping flourish.

Ted McKinney
CEO
National Association of State Departments of Agriculture