April 14, 2020

School Programs Branch,
Policy and Program Development Division,
Food and Nutrition Service,
1320 Braddock Place, 4th Floor,
Alexandria, Virginia 22314.

Re: Notice of Proposed Rule Making – Food and Nutrition Service:
Simplifying Meal Service and Monitoring Requirements in the National School Lunch and School Breakfast Programs RIN 0584-AE67

Dear School Programs Branch:

On behalf of MAZON: A Jewish Response to Hunger, I am writing today regarding the United States Department of Agriculture’s (USDA) request for comments regarding the proposed revision of the National School Lunch and School Breakfast Programs regulations to simplify meal pattern and monitoring requirements.

MAZON vehemently opposes the proposed rule change, which would decrease the nutrition received by school children, many of whom rely on school meals as their primary source of healthy food. As such, this revision must be withdrawn.

Inspired by Jewish values and ideals, MAZON is a national advocacy organization working to end hunger among people of all faiths and backgrounds in the United States and Israel. For nearly 35 years, MAZON has been committed to ensuring that vulnerable people have access to the resources they need to be able to put food on the table. MAZON is a leading voice on anti-hunger issues, especially those that involve low-income populations or problems that have been previously overlooked or ignored—this includes food insecurity among currently-serving military families, veterans, single mothers, seniors, rural communities, Tribal Nations, and college students.

MAZON has particular interest in and expertise concerning federal nutrition policies and increasing access to nutritious food among the nation’s most vulnerable. MAZON has over a dozen years of national leadership in this arena, including participation in the 50th Anniversary White House Conference on Nutrition and Health;
research and production of a national food bank study assessing the impact of nutrition policies and processes; leadership of national nutrition initiatives, including Healthy Options, Healthy Meals, supported by partners including The California Endowment and Kaiser Permanente; and membership on the expert panel of the Robert Wood Johnson Foundation Healthy Eating Research project to develop evidence-based recommendations for nutrition guidelines and the promotion of healthy foods and beverages in charitable food settings.

MAZON has led national initiatives for more than a decade, aimed at improving the nutritional quality of food within charitable food system. While food banks nationwide have made progress toward increasing their offerings of fruits and vegetables to low-income clients, the percentage of unhealthy junk food distributed through the charitable food system still remains too high. In fact, MAZON's 2018 report, “A Tipping Point: Leveraging Opportunities to Improve the Nutritional Quality of Food Bank Inventory” revealed that, on average, one quarter of the inventory distributed by food banks is comprised of beverages and snack foods that are high in added sugars, sodium, and saturated fat. Therefore, it is imperative that frontline federal nutrition programs, like school meals programs, maintain high nutrition standards in order to promote the health and well-being of our nation’s school kids.

Unlike private charitable responses to food insecurity, the U.S. government has a foundational duty to promote and protect the public good. USDA’s role as an administrator of the nation's school meals means the agency must embrace its heightened role and responsibility as a steward for vulnerable and/or specially valued populations, like school children. Therefore it is essential that the food offered at schools is in the best interest of a child’s health. This is especially true because, for many children, the food they eat at school is often their only access to balanced, nutritious meals.

USDA also has a heightened responsibility to uphold and model standards that are consistent with the public interest and broad social values and goals. The school meal environment is extremely important for establishing nutritious dietary patterns early on in a child’s life. As such, the nutritional value of USDA’s school meals should be consistent with USDA’s dietary guidelines. Relaxing school meal nutritional standards sends a message that USDA does not
support the dietary guidelines that it sets and claims as a cornerstone of federal nutrition policy and nutrition education activities. Policy coherence and compliance across the activities and programs of USDA is necessary for the agency to maintain credibility and proper functioning, and helps ensure school children are getting healthy and consistent messages that reinforce good eating habits that will improve long-term health outcomes.

As the current COVID-19 pandemic highlights the absolute importance of school meals in the lives of low-income families across the country, now is a particularly inopportune time to weaken the nutritional value of those meals. It is imperative that our government privilege the nutrition of schoolchildren over the whims of politicians and school administrators. As this proposed rule change would certainly harm children who rely on USDA to ensure they are receiving the nutrition they need to learn and thrive, USDA should not proceed with this method of simplify meal pattern and monitoring requirements and the revision should be withdrawn.

Sincerely,

Abby J. Leibman
President and CEO
MAZON: A Jewish Response to Hunger