

April 8, 2013

The Honorable Thomas Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250

Dear Secretary Vilsack,

I am writing on behalf of the statewide Childhood Obesity Prevention Coalition to express our appreciation for the U.S. Department of Agriculture's (USDA) work to update the nutrition standards for snacks and beverages sold in schools through a la carte, vending machines, school stores, and on-campus fundraisers (also known as competitive foods). Though we strongly support the "Smart Snacks in Schools" proposed rule, we believe that it could be enhanced upon to ensure that competitive foods and beverages are held to comprehensive standards nationally.

While there has been some progress in improving the nutritional quality of competitive foods due to state and local policies and voluntary action, nutritionally poor foods and beverages are still widely available in schools.

We strongly support the following additions the final rule:

- Foods sold in schools should meet strong standards for calories, fats, sugars, and salt, as well as provide to students a positive nutritional benefit, such as be a fruit, vegetable, or whole grain, or naturally contain meaningful amounts of a nutrient of public health concern (i.e., calcium, potassium, vitamin D, or dietary fiber).
- The standards should apply to snacks and beverages sold in schools, across the school campus, and throughout the school day (until at least 30 minutes after the last class ends).
- We support Alternative C1 for the sugars standard, allowing no more than 35 percent of calories from total sugars in foods, as recommended by the Institute of Medicine.
- The standards should be applied to foods and beverages as they are packaged and sold to children (i.e., one bag of chips should count as one serving).
- All foods sold in school cafeterias should meet the standards, with no exceptions for any items sold a la carte.

- Sugary drinks, like full-calorie sodas, should not be sold in schools. We urge USDA to also exclude full-calorie sports drinks, which get all their calories from sugars.
- Schools should make potable water readily accessible to children at no charge during the school lunch and breakfast meal service.
- Calorie limits should be tiered with grade level, similar to the reimbursable meal programs. A kindergartner needs fewer calories than a high school student.

Studies show that unhealthy foods and beverages sold through vending machines, a la carte, and other venues outside of school meals have a negative effect on students' diets and weights. They also undercut the national investment and participation in the school meal programs. Selling unhealthy foods and beverages in schools also undermines nutrition education by sending children the message that good nutrition is unimportant.

We applaud USDA for proposing this much-needed update and urge you to build on your proposal and strengthen it to ensure that all foods and beverages sold in schools meet strong nutrition standards to help safeguard and support the health of our school children.

Thank you for your consideration.

Sincerely,



Victor Colman, JD
Director, Childhood Obesity Prevention Coalition

COALITION MEMBERS

ACCESS TO HEALTHY FOOD COALITION
ACTION FOR HEALTHY KIDS – WA CHAPTER
AMERICAN ACADEMY OF PEDIATRICS – WA CHAPTER
AMERICAN ASSOC. OF LANDSCAPE ARCHITECTS -- WA CHAPTER
AMERICAN CANCER SOCIETY – CANCER ACTION NETWORK
AMERICAN DIABETES ASSOCIATION
AMERICAN HEART ASSOCIATION
AMERICAN PLANNING ASSOCIATION (WA CHAPTER)
ARTHRITIS FOUNDATION
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CASCADE BICYCLE CLUB EDUCATION FOUNDATION
CASCADE LAND CONSERVANCY
COALITION FOR SAFETY AND HEALTH IN EARLY LEARNING
COMPREHENSIVE HEALTH EDUCATION FOUNDATION (C.H.E.F.)
CHILDREN’S ALLIANCE
COMMUNITY CHOICES (CLARK COUNTY)
FEET FIRST
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HOPE HEART INSTITUTE
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MULTICARE HEALTH SYSTEMS
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WASHINGTON DENTAL SERVICE FOUNDATION
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WASHINGTON SCHOOL NUTRITION ASSOCIATION
WASHINGTON STATE ASSOCIATION OF LOCAL PUBLIC HEALTH OFFICERS
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YAKIMA COUNTY MEMORIAL HOSPITAL
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