



Gerald J. and Dorothy R.  
Friedman School of  
Nutrition Science and Policy

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**To:** Chairwoman Debbie Stabenow  
U.S. Senate Committee on Agriculture, Nutrition, and Forestry

**Re: Comments for the Hearing on Child Nutrition**

Dear Chairwoman Stabenow:

Thank you for your leadership and service. Our nation faces a unique moment in time to address nutrition security for all.

As one of the leading institutions in the world for nutrition science and policy, the Friedman School's mission is to produce trusted science, future leaders, and real-world impact. The undersigned faculty – recognized experts in their fields – are pleased to share this statement related to the Senate Hearing on child nutrition.

Nutrition security – access to and availability of nourishing food – is central to the development, well-being, health, and future productivity of all children. Yet, Tufts research shows that **56% of U.S. children have a diet with poor nutritional quality**. And, due to structural inequities, rates of poor quality diets are higher among children with lower family incomes, lower parental education, and Black and Latinx children.

These challenges and disparities have been further exacerbated by the COVID-19 pandemic, shuttered schools, and economic downturn, which have increased food insecurity to the highest rates since the U.S. government began its tracking.

Crucially, Tufts research also shows that the **nutritional quality of meals, snacks, and beverages consumed in the U.S. varies widely depending on the food source**. Following the passage of the Healthy, Hunger-Free Kids Act (HHFKA) in 2010, **the nutritional quality of food consumed from schools improved dramatically**: the proportion that was poor nutritional quality was cut by more than half, from 57% to 24%. Crucially, **these improvements were also highly equitable**, with similar improvements by age, gender, race, ethnicity, parental education, and family income.

In contrast, among US children, the proportion of poor nutritional quality food consumed from grocery stores declined much less, from 53% to 45%; and the proportion of poor nutritional quality food consumed from restaurants declined least, from 85% to 80%. And, in contrast to the nutritional improvements in school meals, significant disparities were seen in improvements in food consumed from grocery stores, with greater improvements among whites than Blacks or Hispanics, and among children in households with greater family income or heads of household with higher educational attainment than with lower income or education.

These findings highlight that, after passage of the HHFKA, **school meals are now, on average, the single healthiest source of foods for U.S. children; and also the most equitable source of nutritious foods**.

These results highlight the importance of universal access to school meals, maintaining and strengthening school nutrition standards, and extending access and standards to the summer.

Based on nutritional and policy evidence, we recommend the following actions:

## **I. Strengthen Child Nutrition Policies and Infrastructure**

### ***School Lunch and other Childhood Programs***

1. Restore and further strengthen the Healthy Hunger Free Kids Act (HHFKA) nutrition standards for the National School Lunch and School Breakfast Programs, including stronger standards for more fruits, vegetables, whole grains, and healthy fats and less sodium, added sugars, and refined grains and cereals.
2. Enact universal school meals for all children in K-12 public schools, eliminating stigma, improving nutrition for all children, and reducing burdensome and cost-inefficient administrative requirements of the current program.
3. Expand the Fresh Fruit and Vegetable Program, [which successfully increases fruit and vegetable consumption](#) in low-income elementary school students, to middle and high schools.
4. Enact the [Stop Summer Child Hunger Act](#) to create a nationwide, summer electronic benefits transfer (EBT) program for kids to access healthy meals during summer months when schools are closed. The successful [USDA Summer EBT pilots](#) showed high participation rates and improved dietary quality; and served as the basis for Pandemic-EBT during COVID-19 related school closures. All states now have increased administrative capacity to implement Summer EBT after operating P-EBT.
5. Raise the school-meal reimbursement rate for all schools to provide more flexibility to purchase healthier foods and use healthier ingredients.
6. Increase mandatory funding and expand access for the USDA Farm to School Grant program to support increased access to nutrition education and engagement with local/regional food systems.

### ***WIC***

1. Prioritize the administration's call to boost WIC funding.
2. Support breastfeeding among postpartum women by expanding investment in the Breastfeeding Peer Counselor Program, providing funding for breastfeeding supplies, and allowing for the purchase of banked donor milk.
3. Extend postpartum eligibility for mothers from six months to two years; and streamline participant access by extending certification periods to two years.
4. Extend eligibility for children by one year, until their sixth birthday, to ensure that no child slips through the nutrition gap between WIC and the National School Lunch and School Breakfast program.
5. Make it easier to obtain and utilize WIC benefits digitally, preferably in a way that is integrated with SNAP.

### ***SNAP***

1. Prioritize the administration's legislative proposals and administrative plans to increase SNAP funding, especially to revise the Thrifty Food Plan to enable it to pay for a full supply of healthy foods.
2. Protect the structure and funding of this critical program for the millions of Americans who struggle with food and nutrition insecurity. SNAP benefits should be updated and increased (beyond the additional investments proposed by the Biden administration) to ensure that families can be food secure and meet the Dietary Guidelines for Americans goals, including taking into account the time and opportunity cost of shopping and preparing meals. Allow all households, rather than only those with older adults or persons with disabilities, to claim actual shelter costs as well as medical costs to determine SNAP benefits. Streamline procedures to make it easier for eligible Americans to apply and enroll.

3. Make nutrition security a congressionally mandated third core objective within SNAP, commensurate with SNAP's other current core objectives of food security and fiscal integrity. Update the USDA Food Plans to create a Thrifty Food Plan that improves SNAP nutritional quality; and create a Deputy Administrator for nutrition within the USDA's Food and Nutrition Service (FNS) to ensure that nutrition is at the forefront of all USDA food assistance programs.
4. Leverage SNAP for better nutrition, improved health outcomes, reduced disparities, and lower healthcare spending. First, encourage state pilot programs to test innovative [nutrition incentive and disincentive programs](#) that guide participants toward healthier eating while preserving their choice and autonomy in food decisions. Second, increase funding for the GusNIP Produce Prescription programs that help pay for fruits and vegetables while also supporting American farmers [so that all SNAP participants can benefit](#).
5. Continue to expand online SNAP, allowing recipients to make purchases (including of fresh produce) via online grocery and retailers and through farmers markets and farm stands, to improve participant experience and increase access; and set new rigorous standards for online SNAP retailers, including the need for robust nutrition education and guidance in online platforms.

## **II. Strengthen our Science Infrastructure to Advance Nutrition Security for Children**

1. Create a new [National Institute of Nutrition \(NIN\)](#) at the NIH, accompanied by meaningful new funding to complement existing NIH activities. A [recent NIH analysis](#) concluded that large mismatches exist between the top causes of poor health in the U.S. versus NIH research spending on these areas, with the largest gap in the area of nutrition. A National Institute of Nutrition is essential to support foundational and translational research for improving nutrition in children, to coordinate nutrition science across the NIH and other departments and agencies (USDA, DoD, VA, CDC, FDA, CMS, and more), to be a strong partner for the Dietary Guidelines for Americans, to train scientists and healthcare professionals in nutrition, and to communicate with the public.
2. [Direct and fund USDA](#) to prioritize research on the intersections of production, nutrition security, and equity across the Research, Education, and Economics (REE) agencies.

## **III. Strengthen our Public Health Infrastructure to Advance Nutrition Security for Children**

1. Double the funding for the CDC's work in nutrition, physical activity and obesity (NPAO), which currently receives [only \\$100 million annually](#).
2. Create dedicated funding for HHS and USDA to both develop and, importantly, disseminate the Dietary Guidelines for Americans and regularly update the Dietary Reference Intakes (DRI) that drive much of nutritional guidance for children.

## **IV. Strengthen National Leadership and Coordination of Federal Food and Nutrition Policy**

1. Work with the administration to create a new Deputy Director for Food and Nutrition Policy within the National Security Council (analogous to the Deputy Director for Health Policy).
2. Work with the administration to ensure appointment of expertise in food, nutrition, and agricultural issues within the White House Office of Science and Technology Policy (OSTP), President's Council of Advisors on Science and Technology (PCAST), and similar bodies and appointments within HHS, USDA, DoD, and VA.
3. Coordinate the \$150+ billion annual federal investments in food and nutrition programs through the creation of a new [Office of the National Director of Food and Nutrition \(ONDFN\)](#). This Office, modelled

on the precedent and success of the Office of the Director of National Intelligence (ODNI), will provide coordinated, actionable information and recommendations to the President, Cabinet, and Congress on nutrition security, equity, and sustainability issues across the diverse agencies and programs that form the federal food and nutrition community, including the USDA, DoE, CDC, FDA, NIH, DoD, VA, CMS, and more

4. Organize and host a new [White House Conference on Food, Nutrition, and Health](#). The last such conference was in 1969, bringing together diverse leaders from public and private sectors to craft real policy solutions to address widespread hunger in America. The 1969 Conference created or updated most of the federal food and nutrition programs we utilize today. It's been 52 years, and we need a second White House Conference to bring together all relevant stakeholders and re-imagine our food system, build a national consensus strategy around food and nutrition, and develop a concrete plan of action and clear benchmarks to measure success for the next 50 years.

## **V. Strengthen the Food Environment to Promote Nutrition Security for Children**

1. Reduce harmful additives in packaged foods by implementing the [10-year FDA voluntary sodium targets](#), which many businesses fully support; and similar targets for added sugar, as developed by the [National Salt and Sugar Reduction Initiative \(NSSRI\)](#).
2. Support city, county, state, tribal, and federal tax strategies to increase the price of less healthful foods and beverages in retail and restaurant settings, and [pair this with subsidy strategies](#) to lower prices for healthy foods. The evidence makes clear that such policies would market-normalize the true societal costs of foods and [be highly cost effective in improving population health and in saving lives](#).
3. Strengthen and enforce existing policies and enact new nutritional standards for marketing of foods and beverages, in all forms of media, to children under age 12, and in particular to children of color. Marketing standards should be based on sound nutritional criteria, such as a nutrient profiling system like the Tufts Food Compass. Industry tax credits for costs of marketing unhealthy foods should also be eliminated.
4. Capture and spur the power of the private sector by expanding and specifying new Opportunity Zone incentives focused on investments in food, nutrition, and wellness to improve racial equity and reduce disparities; encouraging and supporting new Environmental, Social, and Corporate Governance (ESG) private sector investment metrics that incorporate nutrition security, equity, and sustainability; and encouraging and rewarding Benefit Corporation status (B-Corporation designation) for U.S. and multinational food businesses, including high standards of verified social and environmental performance, public transparency, and legal accountability to balance profit and purpose.

The actions we have outlined here will improve nutrition for all American children, nourishing their minds and bodies and launching them and our nation to new heights of achievement, well-being, and productivity.

Sincerely,



Dariush Mozaffarian, MD DrPH  
Dean  
Jean Mayer Professor of Nutrition and Medicine

Lynne M. Ausman, DSc  
Professor

Jeffrey B. Blumberg, PhD  
Professor Emeritus

Larissa Calancie, PhD  
Research Assistant Professor

Christina Economos, PhD  
Chair, Division of Nutrition Interventions, Communication, and Behavior Change  
Professor

Sara C. Folta, PhD  
Associate Professor

Timothy Griffin, PhD  
Chair, Division of Agriculture, Food, and Environment  
Associate Professor

Jeanne Goldberg, PhD  
Professor Emerita

Gregory Gottlieb, JD  
Director, Feinstein International Center  
Professor

Daniel Hatfield, PhD  
Research Assistant Professor

Diane L. McKay, PhD  
Assistant Professor

Renata Micha, RD, PhD  
Research Associate Professor

Nicola McKeown, PhD  
Associate Professor

Kieran F. Reid, PhD  
Assistant Professor

Susan Roberts, PhD  
Professor

Irwin H. Rosenberg, MD  
Professor Emeritus

Fang Fang Zhang, MD PhD  
Associate Professor

*These comments represent the recommendations of individual Tufts faculty members. The opinions expressed in this document do not necessarily represent the views or opinions of the Friedman School of Nutrition Science and Policy, Tufts University, or its affiliates.*