April 25, 2014

Julie Brewer
Chief, School Programs Branch
Policy and Program Development Division
Child Nutrition Programs
Food and Nutrition Service
U.S. Department of Agriculture
P.O. Box 66740
St. Louis, MO 63166-6740

Docket Number: FNS–2014–0010

Dear Ms. Brewer:

On behalf of the 62,000 primary care pediatricians, pediatric medical subspecialists, and surgical specialists of the American Academy of Pediatrics (AAP) who are committed to the attainment of optimal physical, mental and social health and well-being for all infants, children, adolescents, and young adults, we appreciate this opportunity to comment on the U.S. Department of Agriculture’s (USDA) proposed rule, *Local School Wellness Policy Implementation under the Health, Hunger-Free Kids Act of 2010* [Docket No: FNS-2014-0010].

The AAP has long advocated that schools play a critical role in promoting student health, preventing childhood obesity, and combating problems associated with poor nutrition and physical inactivity. School attendance represents a unique opportunity to address nutrition and physical fitness. Each day, 55 million U.S. students attend school, which constitutes nearly one-half of their wakeful hours. In light of rising rates of overweight and obesity, have an increasingly important role to play in promoting nutrition.

With the publication of the proposed rule, the AAP applauds the agency’s commitment to promoting school wellness. We believe the proposed rule strengthens the existing guidelines around local wellness policies by assuring that schools have goals for nutrition promotion and education, physical activity, food marketing and advertising, as well as other school-based activities that promote student wellness. The proposed rule also improves accountability and public reporting to provide transparency with parents, students and the community on implementation, progress and regular review of the wellness policy. Additionally, it assures adequate representation on the wellness committee by key stakeholders, including leadership by one or more local education agency (LEA) or school official(s), to optimize the development, implementation and coordination of the local wellness policy across the school environment and community with input and accountability from those involved.
The AAP is particularly pleased that the USDA specifically calls out the promotion of physical education and physical activity in the school wellness policies. The AAP would like to see the agency distinguish between recess and physical education in school wellness policies. Recess is a complement to, but not a replacement for, physical education. Physical education is an academic discipline. Whereas both have the potential to promote activity and a healthy lifestyle, only recess (particularly unstructured recess) provides the creative, social, and emotional benefits of play. Additionally, the AAP would like to see the Food and Nutrition Service clarify that recess and physical activity should not be withheld from students as a punitive measure.

We fully support coordination and alignment with USDA’s school meal and Smart Snack standards. We agree that LEAs should be encouraged to describe whether and how their food and beverage offerings comply with the new meal and Smart Snack standards, including whether in-school fundraisers that involve food and beverages meet the Smart Snacks standards.

In addition, we support that local wellness policies address standards for foods and beverages available on campus, including through classroom parties and celebrations, snacks served at school that are not part of a federally reimbursed snack program, and food rewards and incentives. To maintain consistency, we suggest that USDA encourage schools to use the Smart Snacks nutrition standards for those foods. Schools should not only teach children how to make healthy choices, but also should provide an environment that fosters healthy eating.

We are also pleased that the proposed rule would require schools to address food marketing and advertising in their local wellness policies. We agree that the Smart Snack standards should be used as the minimum standard for school food marketing. However, schools, school districts, and states can strengthen and build on those standards. Using the same standards for marketing as for food sales can help to facilitate implementation and help to reduce confusion.

We commend USDA for developing a robust rule for local school wellness policies that will strengthen existing policies and lead to more effective leadership, implementation, stakeholder involvement, accountability, assessment, and transparency. We are pleased that USDA will be providing comprehensive model policies, toolkits, and technical assistance. We urge USDA to include additional definitions in the final rule for each of the key areas to be covered in the local wellness policy and provide schools with about a year for compliance with the final rule.

Thank you for your attention to the views of the Academy. We look forward to continuing to work with the USDA to ensure that schools play a critical role in promoting student health.

Sincerely,

[Signature]

James M. Perrin, MD, FAAP President

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