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School Programs Branch
Policy and Program Development Division
Food and Nutrition Service
3101 Park Center Drive, 12th Floor
Alexandria, VA 22302

RE: FNS-2017-0039
Document Number 2018-04233
83 FR 9447

To whom it may concern:

The Pennsylvania State Grange is submitting comment on the proposed Food and Nutrition Service Rule cited above.

The PA State Grange strongly supports hiring flexibility and other measures being taken to ensure that rural America's school lunch programs have tools from FNS to better provide nutritional lunches for school students.

We especially support flexibility provided in this proposed Rule allowing more local discretion under the idea that one size does not always fit all.

Reinforcing Secretary of Agriculture Perdue's earlier 2017 order allowing for non-skim milk to be offered, PA State Grange would like to see whole milk introduced as part of students' nutritional standards. Given the purpose of this proposed Rule to allow more responsiveness of the School Meal Programs to what students need and want, it seems logical to the PA State Grange to advocate specific inclusion in this Rule that nutritionists be able to include whole milk if they choose.

Given mounting evidence that whole milk supplies positive nutrients necessary for growing bodies, PA State Grange feels that this is a logical step. We ask that the following abstract be included as part of our comment. Its' source is a study produced by the National Institutes of Health US National Library of Science. Further, we request that FNS go to the original source for more detailed information about the study's findings and methodology. Striking is the conclusion that whole milk actually inhibits

obesity, a goal shared by those worried about the accelerating obesity epidemic in young people today.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5552381/>
US National Library of Medicine
National Institutes of Health



[Prev Med Rep.](#) 2017 Dec; 8: 1–5.
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Full fat milk consumption protects against severe childhood obesity in Latinos☆☆☆

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Abstract

Consumption of non- or low-fat dairy products is recommended as a strategy to lower the risk of childhood obesity. **However, recent evidence suggests that consumption of whole fat dairy products may, in fact, be protective against obesity.** Our objective was to determine the association between milk fat consumption and severe obesity among three-year-old Latino children, a population with a disproportionate burden of obesity and severe obesity. 24-hour dietary recalls were conducted to determine child intake in San Francisco based cohort recruited in 2006–7. Mother-child dyads were weighed and measured. The 24-hour recall data was analyzed to determine participants' consumption of whole milk, 2% milk, and 1% milk. The milk consumption data was used to calculate grams of milk fat consumed. The cross-sectional association between milk fat intake and severe obesity (BMI \geq 99th percentile) was determined using multivariable logistic regression. Data were available for 145 children, of whom 17% were severely obese. Severely obese children had a lower mean intake of milk fat (5.3 g vs. 8.9 g) and fewer drank any milk (79% versus 95% for not severely obese children ($p < 0.01$)). Among the potential confounders assessed, maternal BMI and maternal marital status were associated with severe obesity and were included in a multivariate model. In the multivariate model, higher milk fat consumption was associated with lower odds of severe obesity (OR 0.88 CI 0.80–0.97). Higher milk fat consumption is associated with lower odds of severe obesity among Latino preschoolers. These results call into question recommendations that promote consumption of lower fat milk.

Sincerely,

Wayne Campbell
PA State Grange President