

October 29, 2026

Secretary Robert F. Kennedy Jr.
U.S. Department of Health and Human Services
200 Independence Avenue SW
Washington DC 20201

Secretary Brooke Rollins
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington DC 20250

Re: Recommendations for USDA's Nutrition Standards for School Meals

Dear Secretary Rollins and Secretary Kennedy,

The Healthy Hydration Partnership (HHP), together with the undersigned organizations and companies, thanks the U.S. Department of Agriculture (USDA) and the U.S. Department of Health and Human Services for their continued leadership in strengthening federal nutrition guidance. We especially commend your efforts to turn the 2025–2030 Dietary Guidelines for Americans (DGAs) into clear, practical messages that schools, families, and communities can understand and use every day.

We are particularly grateful that the DGAs make water central to their recommendations, stating that “Hydration is a key factor in overall health. Choose water (still or sparkling) and unsweetened beverages.” For too long, drinking water has been treated as an afterthought in school nutrition programs. By putting hydration at the forefront, the Trump Administration has addressed that gap and set a strong foundation that should now carry into child nutrition standards and guidelines.

Schools are a key setting for building healthy habits, including drinking water regularly that last into adulthood. The DGAs give USDA and HHS an important opportunity to reinforce healthy hydration across the school environment. That means not only ensuring access to drinking water, but also making water a visible, consistent part of school nutrition policies, communications, and infrastructure.

Most American children are not drinking enough water. A 2026 study in *The Journal of Nutrition* cites prior research indicating that approximately 80% of U.S. children do not meet recommended water intake levels.¹ This shortfall has real consequences. A 2026 peer-reviewed expert consensus identified chronic, often unnoticed underhydration as a public health concern. It also found that indicators of chronic underhydration are associated with obesity, type 2 diabetes, cardiovascular and kidney disease, and accelerated biological aging.²

¹ Seal AD, Suh H, Emmanuel H, Colburn AT, Summers L, Bottin J, Zemdegs J, Vanhaecke T, Mauromoustakos A, Kavouras SA. “Hydration and Water Intake among Children and Parents.” *The Journal of Nutrition*. 2026;156(8):101643. <https://doi.org/10.1016/j.tjn.2026.101643>.

² Tahiri M, Trumbo PR, Bonci LJ, Casa DJ, Drewnowski A, Gilbert JA, Johnson RJ, Muñoz CX, Kavouras SA. “Perspective: Water and Electrolytes in Daily Hydration versus Acute Rehydration: Expert Consensus and Research Priorities.” *Current Developments in Nutrition*. 2026;109549. <https://doi.org/10.1016/j.cdnut.2026.109549>.

Schools are well positioned to help close this gap. Clear guidance on healthy beverage choices, along with drinking water that is easy to find, seen as safe and appealing, and readily available throughout the school day, can help students build habits that support lifelong health. We therefore respectfully offer the following recommendations as USDA updates the Nutrition Standards for School Meals to align with the 2025–2030 DGAs.

Recommendation: Pair Beverage Restrictions with Clear, Positive Guidance to Choose Water

The 2025–2030 DGAs clearly direct Americans to “choose water (still or sparkling) and unsweetened beverages.” This positive message has not yet been reflected in USDA and HHS school nutrition communications. We urge USDA and HHS to incorporate it into future school nutrition announcements, educational materials, and other communications about beverages. Schools and families should know not only which beverages to limit, but also which to choose instead. This guidance would complement, not replace, guidance on other healthy beverages.

USDA’s recent Pledge for Healthier School Meals illustrates why this matters. The Pledge asks schools not to “...offer beverages containing added sugars or artificial sweeteners.” We support this goal, but are concerned that identifying beverages to avoid without providing clear examples of what to offer instead leaves schools, families, and students to guess. Naming water as a recommended choice gives everyone a simple, actionable message. It translates federal guidance into a practical step schools can take and helps students build healthy hydration habits.

We recommend that USDA update the Pledge and related materials to explicitly identify water as a preferred beverage for hydration when discussing beverages schools are asked to avoid.

Recommendation: Provide Model Hydration Language for Local School Wellness Policies

Local School Wellness Policies help districts translate federal nutrition guidance into school-level practices. Every district in the National School Lunch Program must adopt one, and each policy must include goals for nutrition promotion and education. Model hydration language would give districts a practical way to meet these requirements and align their policies with the DGAs.

We urge USDA to work with the Healthy Hydration Partnership and other stakeholders to develop, or formally recognize, standardized model language on drinking water that districts can adopt directly.

At a minimum, this language should address:

- Access: convenient access to safe, appealing drinking water throughout the school day
- Promotion: promoting water through nutrition education and school communications
- Placement and upkeep: the visibility, condition, and placement of water access points across the school environment

We also urge USDA to strengthen how Administrative Reviews assess drinking water. Having water available on paper is not the same as students using it. Water that is hard to find, poorly maintained, or unreliable often goes unused. USDA guidance and review protocols should look beyond whether water is present and also assess its location, visibility, reliability, and condition. That includes encouraging hydration stations in high-traffic areas such as cafeteria serving lines and dining areas.

Together, these steps would shift the question from whether water is available to whether students can and will use it, creating school environments where healthy hydration is accessible, visible, and encouraged.

Recommendation: Expand Equipment Grants and Clarify Allowable Costs for Safe Drinking Water

Many schools still lack reliable access to safe drinking water. A 2025 assessment of four New Jersey school districts found 20 to 30 percent of schools experience localized issues related to water cleanliness, taste, pressure, or temperature.³ Nationally, the U.S. Government Accountability Office estimated that 41% of school districts had not tested their drinking water for lead in 2016 or 2017, and another 16% did not know whether they had.⁴ Students cannot build healthy hydration habits when the water available to them is unreliable, unappealing, or of uncertain safety.

We urge USDA, in coordination with HHS, to take three steps:

1. Prioritize hydration infrastructure in school equipment grants. USDA should state explicitly that hydration stations, multi-tier water coolers, and bottle-refilling stations are eligible and should treat them as a priority under applicable school equipment grant programs and other available federal resources.
2. Update and reaffirm SP 49-2016. In Policy Memorandum SP 49-2016 / CACFP 18-2016, *Resources for Making Potable Water Available in Schools and Child Care Facilities*, USDA explained that purchasing potable water and paying for water-testing services may be allowable expenses under the nonprofit school food service account when they are reasonable, necessary, and allocable to the federal meal programs. USDA should update this guidance to state clearly that packaged drinking water is an allowable temporary expense when safe drinking-water infrastructure is unavailable, disrupted, or inadequate to meet students' hydration needs. Clear, current guidance would give state agencies and school food authorities the confidence to act.
3. Issue practical guidance for disruptions. USDA and HHS should jointly provide schools with practical guidance on keeping safe drinking water available during infrastructure failures, emergencies, and other operational challenges.

These steps would complement, not replace, investment in permanent drinking-water infrastructure. Together, they would help schools build lasting hydration infrastructure while ensuring students always have access to safe drinking water.

Conclusion

We appreciate USDA's continued engagement and collaboration on these issues, including our previous discussions with your staff about opportunities to strengthen healthy hydration in schools. We value the Department's openness to stakeholder input and stand ready to continue working with USDA and HHS to develop model language, communications resources, and other practical

³ Wang, C., Acciai, F., Martinelli, S., & Ohri-Vachaspati, P. (2025). Drinking water An assessment of four New Jersey school districts. *International Journal of Environmental Research and Public Health*, 22(9), 1332. <https://doi.org/10.3390/ijerph22091332>

⁴ U.S. Government Accountability Office. (2018, July). K-12 education: Lead testing of school drinking water would benefit from improved federal guidance (GAO-18-382). <https://www.gao.gov/products/gao-18-382>

tools that help schools implement the Dietary Guidelines and ensure students have consistent access to safe, appealing drinking water throughout the school day.

Thank you for your consideration and for your continued leadership in improving nutrition and health outcomes for children nationwide. We welcome the opportunity to build on our previous conversations and work collaboratively to advance healthy hydration in America's schools.

Sincerely,

Healthy Hydration Partnership (HHP)

American Academy of Pediatric Dentistry

American College of Lifestyle Medicine

Association of California Water Agencies (ACWA)

Coalition for Metabolic Health

Drinking Water Research Foundation (DWRF)

IAPMO (the International Association of Plumbing and Mechanical Officials)

International Bottled Water Association (IBWA)

National Groundwater Association (NGWA)

Partnership for Healthier America

Protect Kids from Lead (PKFL)

The Groundwater Foundation

Water Quality Association (WQA)

Water Quality Research Foundation

CC: Shiela Corley, Acting Administrator, Food and Nutrition Administration, USDA

Dr. Eve Stoody, Deputy Administrator, Nutrition Research and Regulations, USDA

Tom Engels, Administrator, Health Resources and Services Administration (HRSA), HHS

Darcie Johnston, Director, Office of Intergovernmental and External Affairs, HHS