



The National Drinking Water Alliance congratulates Secretary Vilsack on your return to USDA and is thrilled that we will again have the opportunity to work with you and with your excellent team members, both new and returning. We appreciate this chance to put forward some top **drinking water recommendations of relevance for USDA.**

Reducing sugar-sweetened beverage consumption and enabling drinking water as an alternate and healthy source of hydration should be a paramount public health strategy that USDA can lead, through nutrition programs and via CNPP messaging. Provision of clean, safe, accessible and affordable drinking water can further all of the Biden-Harris Administration [Priorities](#) – COVID-19, health, equity, climate change and the economy – and should be included in all relevant nutrition and infrastructure policies, regulation and programs.

Background. The [Report](#) of the 50th Anniversary of the White House Conference on Food, Nutrition and Health describes a U.S. population where the *minority* are metabolically healthy. Diet-related chronic diseases, including but not limited to type 2 diabetes and other metabolic diseases, a range of cardiovascular diseases, and dental caries, exact a toll on Americans' health and well-being as well as on personal, state and federal budgets. Obesity alone affects 42% of US adults. This is projected to rise to 49% by 2030 if current trends continue, with 24% having severe obesity. Overweight is the leading disqualifier for fitness to serve in the military. In other words, we face a public health crisis caused by diet-related conditions. Extensive science links consumption of sugar-sweetened beverages (SSBs) to increased risk for these conditions; SSBs are the largest single source of added sugars in the American diet and are a top source of calories; further, these calories have little to no nutritional value. Structural racism and other inequities contribute to greater SSB consumption in low-income and communities of color, thus exacerbating health disparities. **If the public is to reduce SSB consumption, water, a healthy alternative, must be available and promoted.**

- **COVID-19.** Water access is essential for hygiene to help prevent COVID-19 spread, but also, substituting drinking water for SSBs may help improve COVID-19 outcomes. This is because SSBs are a risk factor for the most common conditions – type 2 diabetes, obesity and cardiovascular conditions – associated with severity of COVID infection and thus hospitalization, need for ICU care, length of stay and death. Research suggests biomarkers for these conditions can improve within weeks of reducing added sugar consumption.

Ensuring Drinking Water Safety and Access for Infants and Children

Time-sensitive: COVID-19 tap water safety in CACFP and NSLP

USDA should work quickly, with Centers for Disease Control and water scientists,* to clarify and disseminate guidance for NSLP schools and CACFP childcare as they re-commission plumbing in buildings that have seen low or no use during pandemic closures, so that water sources may safely be put back in use.

*Convened by Purdue University [Center for Plumbing Safety](#)

SPECIAL SUPPLEMENTAL NUTRITION PROGRAM for WOMEN, INFANTS, AND CHILDREN (WIC)

Legislative recommendation for drinking water safety for WIC infants and families

- In order to continue strong support for breastfeeding and for healthy hydration, provide an additional benefit for purchase of home water filters or bottled water in 1-5 gallon containers for WIC participants in households with tap water contamination (including lead determined by testing through a certified lab or other contaminants determined by annual utility Consumer Confidence Report)

Administrative recommendations for drinking-water-safety education for WIC families

- In order to provide safe infant formula for infants in households without safe tap water (either elevated lead determined by testing through a certified lab or other contaminants determined by annual utility Consumer Confidence Report), amend 7 C.F.R. § 246.10. (e) 1 iv. (A), that currently states that ready-to-feed formula may be provided when “The participant's household has an unsanitary or restricted water supply or poor refrigeration,” to specify that “unsanitary or restricted water supply” includes *water that is unsafe at the tap, including for lead elevated above Lead and Copper Rule or state standards, or for other regulated contaminants present above federal or state standards in tap water provided by a public water system*
- WIC should add a nutrition education component about tap water safety
 - Provide information on water quality, lead testing, how to read Consumer Confidence Report and basic safe water practices in the home
- WIC should develop resources for families with information about community/state assistance to access safe drinking water when home tap water is not safe

CHILD AND ADULT CARE FOOD PROGRAM (CACFP)

Legislative recommendation for tap water safety in CACFP

- CACFP should require testing and remediation for lead at all taps used for drinking and cooking water. See boxed statement on page 4
 - Note: EPA's new Lead and Copper Rule requires utilities to sample tap water for lead in those childcare facilities served by the water system – but only every 5 years, and at only 2 outlets per facility

Administrative recommendations for CACFP drinking water monitoring

- USDA Monitoring should be revised to help ensure that water in CACFP facilities is potable (safe), for example by requiring documentation that:
 - Facility Director has read the public water supplier's (utility's) annual water quality report (Consumer Confidence Report)
 - Facility is in compliance with state/federal mandates for tap water testing for lead
 - Facility does not have any lead service line
- CACFP drinking water provisions are excellent, but USDA should ensure that monitoring guidance and technical assistance are provided to ascertain compliance with all provisions, including "offer and serve" (CACFP 20-2016).

SCHOOL NUTRITION PROGRAMS (NSLP, SBP, SSO, SFSP, Afterschool)

Legislative recommendation for school drinking water safety

- NSLP should require testing and remediation for lead in school cafeteria and kitchen tap water. See boxed statement on page 4
 - Note: EPA's new Lead and Copper Rule requires utilities to sample tap water for lead in all schools served by the system – but only every 5 years and at only 5 outlets per school

Legislative recommendation for drinking water access in schools

- Require all schools to provide at least one bottle filling station in a high-traffic area accessible throughout the day (i.e., in addition to the cafeteria water source), with NSFstandard filtering if needed for safety (potability) or flavor (palatability)
 - Implement through USDA with Administrative Review accountability (akin to Smart Snacks)

Administrative recommendations for school drinking water safety

- USDA On-site Administrative Review should be revised to ensure that water in NSLP cafeterias and kitchens is potable (safe), e.g., requiring documentation that:
 - Food Service Director has read the public water supplier's (utility's) annual water quality report (Consumer Confidence Report)
 - Facility is in compliance with state and federal requirements for tap water testing for lead

- When a school is its own water supplier, it is in compliance with state and federal requirements for water safety testing
- USDA should consider using Hazard Analysis Critical Control Point (HACCP) program criteria (as used for Food Safety) to ensure drinking water safety

Administrative recommendations for school drinking water access

- USDA On-site Administrative Review should be revised to ascertain that “free water is available for consumption” by establishing not only that a water source is present, but that drinking water access is *effective*, i.e., the source provides potable water, is functional, clean and appealing, with good water flow, and, ideally, includes drinking water promotion.
- USDA should clarify regulatory language to state that, while a Food Service operator may not actively discourage milk or actively encourage water in place of milk, water may be offered throughout the food service area (including in the food service line) and that it may be promoted for its own sake (or instead of sugary drinks) just as long as it is not promoted as a replacement for milk.
- USDA should provide guidance on best practices for effective access to water in all school nutrition programs, including summer food, after-school, and supper programs

Further, USDA should request a multi-agency, multi-stakeholder White House Conference on school and childcare drinking water safety, with a focus on lead, in order to establish consensus on an action level for lead in school and childcare tap water, uniform testing protocols, uniform procedures for data collection and management and other standards for assuring acceptable levels of lead in drinking water.

The [National Drinking Water Alliance](#) (NDWA) is a network of drinking water stakeholders throughout the U.S., including researchers, public health, educational and advocacy organizations, and industry. With our shared belief that water is healthier than sugarsweetened beverages, our mission is to enable children in the U.S. to drink water in the places where they live, learn, and play. NDWA is coordinated by Nutrition Policy Institute, University of California, Division of Agriculture and Natural Resources.