



June 27, 2019

Hon. Pat Roberts, Chair
Committee on Agriculture, Nutrition, and Forestry
U.S. Senate
109 Hart Senate Office Building
Washington, DC 20510

Hon. Debbie Stabenow, Ranking Member
Committee on Agriculture, Nutrition, and Forestry
U.S. Senate
133 Hart Senate Office Building
Washington, DC 20510

Hon. Bobby Scott, Chair
Committee on Education and Labor
U.S. House of Representatives
1201 Longworth House Office Building
Washington, DC 20515

Hon. Virginia Foxx, Ranking Member
Committee on Education and Labor
U.S. House of Representatives
2262 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Roberts, Ranking Member Stabenow, Chairman Scott and Ranking Member Foxx:

As your Committees mobilize to reauthorize the Healthy, Hunger-Free Kids Act, the 58,000 members of the School Nutrition Association (SNA), the 30,000 members of the Association of the School Business Officials (ASBO) and their state affiliates, and the 10,000 members of The School Superintendents Association (AASA) would like to contribute our thoughts.

We are grateful for your vigilance in ensuring that beneficial, cost-effective school nutrition programs can continue to help nearly 30 million students each day, especially students from low-income households, gain access to quality nutritious food while improving their overall health, development, and academic success.

To sustain the progress we've achieved, we ask that Congress:

Return to a Five-Year Administrative Review Cycle

School nutrition professionals and school business officials strive to be responsible stewards of federal funds and welcome efforts to ensure school meal programs fully comply with regulatory requirements. However, School Food Authorities (SFAs) and State agencies that oversee these programs are overwhelmed by excessive reporting requirements required under the shorter three-year Administrative Review (AR) cycle. Layered on top of monthly and annual reporting requirements, and additional audits and inspections, these administrative mandates take substantial time away from the mission of serving students. Meanwhile, the shorter cycle forces State agencies to divert substantial staff time and travel budgets for more frequent reviews. **Congress must encourage USDA to return to a five-year cycle for SFAs consistently in compliance.** State agencies will be able to conduct more thorough reviews and school nutrition professionals will be able to spend more time focused on serving healthful meals.

Modify Smart Snacks in Schools Rule

We support ensuring foods sold a la carte and in vending machines, or “competitive foods”, meet school nutrition standards so *all* foods sold in schools are healthy choices. The Smart Snacks in School Rule unnecessarily forces schools to take healthy school meal options, permitted as part of a reimbursable meal, off a la carte menus and creates inconsistent rules that limit student choice and reduces revenue for school meal programs. Some examples of healthy school meal options that don't meet Smart Snacks regulations include hummus, guacamole and vegetables tossed in olive oil, egg salad

and tuna salad, and even green salads paired with low-fat dressing. **Congress must encourage USDA to modify the Smart Snacks in School Rule to allow all menu items that are permitted to be served as part of a reimbursable meal to be sold at any time a la carte.**

Increase USDA Foods (Commodities) Support for the School Breakfast Program

Schools are working to increase student access to healthy school breakfasts as a multitude of research shows that breakfast consumption improves student behavior, attendance, and performance on standardized tests. While we appreciate the recent \$20 million for breakfast commodities provided in the FY 2019 Agriculture Appropriations Bill, the School Breakfast Program (SBP) remains historically under-funded. USDA estimated the cost of meeting updated nutrition standards for school breakfast would increase food and labor expenses by 27 cents per breakfast, yet no additional funding or USDA Foods entitlement was provided. The 2019 USDA report, *School Nutrition and Meal Cost Study*, found that revenue from SBP breakfasts, including reimbursements, local funds, and student payments, covered only an average of 82 percent of reported costs. Increasing USDA Foods commodity support for the SBP will help close the gap between revenue and cost, provide students with a wider variety of American-grown foods, and help schools invest in innovative breakfast in the classroom programs. USDA Foods support would also assist farmers by creating a larger market for high-quality surplus agriculture products. **Congress must continue and increase USDA Foods support for the School Breakfast Program.**

Oppose School Meal Block Grants

The success and sustainability of school meal programs depend on continued federal involvement, including federal reimbursements for each school meal served. Block grants would dismantle an effective federal program and put students at risk by cutting funds and abolishing federal nutrition standards. **Congress must oppose any efforts to block grant school nutrition programs.**

We urge the Committees to take up these critically important measures while working to reauthorize child nutrition programs. As the process moves forward, we will continue to work with all of Congress to build upon the successes of the Healthy, Hunger-Free Kids Act and assist in efforts towards a comprehensive piece of legislation that addresses the needs of program administrators, providers, and most importantly, our children. We thank you for your time and leadership on this critical issue.

Sincerely,

Gay Anderson, SNS
President
School Nutrition Association

Patricia Montague, CAE
Chief Executive Officer
School Nutrition Association

David J. Lewis
Executive Director
Association of School Business
Officials International

Daniel A. Domenech
Executive Director
The School Superintendents
Association

CC: U.S. Senate Committee on Agriculture, Nutrition, and Forestry
U.S. House Committee on Education and Labor