



2014 Position Paper on Federal Child Nutrition Programs

Federal child nutrition programs provide more than 30 million school lunches and 13 million school breakfasts to students daily. In addition, these federal programs include other critical food assistance for children such as summer meals, afterschool snacks, and suppers. The members of the School Nutrition Association (SNA) are committed to providing nutritious, appealing, and affordable meals which fuel students to succeed academically and thrive physically.

The Healthy, Hunger-Free Kids Act (HHFKA) of 2010 and subsequent regulations made a number of significant changes to the programs intended to improve the health of school children. However, following partial implementation of the HHFKA and the regulations, program costs soared, administrative burdens increased, and student participation in the school lunch program declined by more than one million meals per day. Given today's financially challenging environment, access to child nutrition programs remains a high priority for America's families.

As we move towards Child Nutrition Reauthorization 2015, SNA remains committed to the core principles of:

- *promoting a healthy school environment for children;*
- *providing reasonable flexibility in the operation of school meal programs;*
- *maximizing program efficiency; and*
- *ensuring overall sustainability of child nutrition programs.*

Considering these core principles, the School Nutrition Association advocates for the following actions:

MEAL PATTERN FLEXIBILITY:

Retain the initial requirement that 50% of grains offered through school lunch and breakfast programs be whole grain rich. This action would ease declines in participation and provide reasonable flexibility. The *2010 Dietary Guidelines for Americans* allows for the consumption of some refined grains.

Suspend the implementation of sodium Target 2 pending the availability of scientific research that supports the reduction in daily sodium intake for children. The Institute of Medicine (IOM)'s "School Meals: Building Blocks for Healthy Children" report, commissioned by the US Department of Agriculture (USDA), recommended assessing the progress and effects of sodium reductions on student participation rates, food cost, safety, and food service operations.

Remove the requirement that all students must select a ½ cup serving of a fruit or vegetable as part of a reimbursable breakfast and/or lunch. This requirement has led to increased program costs, plate waste, and a decline in student participation.

COMPETITIVE FOODS:

Reopen and extend the comment period on the "Smart Snacks in School" Interim Final Rule until July 2015. Extending the comment period would allow stakeholders at all levels (national, state, and local) to collect data to assess the impact of the rule during the first year of implementation and provide the USDA the opportunity to make reasonable, responsible, evidence-based adjustments to the final rule.

STRENGTHENING SCHOOL MEAL PROGRAMS:

Encourage a clear and coordinated strategy between the USDA and the US Department of Education to achieve a school environment supporting students' health, well-being, and academic success. Joint efforts are essential to address adequate time for students to consume meals and for the development of curriculum that supports a healthy school environment.

Return to the five year administrative review cycle. State agencies overseeing school meal programs do not have adequate staff and resources to effectively sustain the new three year administrative review cycle under the HHFKA. Returning to the five year administrative review cycle would allow state agencies to provide School Food Authorities (SFAs) greater support and guidance as they work to meet new standards.

Address problem of unpaid meal charges. Unpaid meal charges by students continue to increase. The USDA should fully implement the requirements of the HHFKA to examine and report on this issue and then implement regulations that effectively address debt arising from unpaid meal charges.

Increase program simplification. As Congress drafts and the USDA implements the 2015 Child Nutrition Reauthorization, efforts should be made to simplify child nutrition programs, easing the administrative and paperwork burdens on SFAs.

Provide flexibility on Paid Meal Equity. Section 205 of the HHFKA mandates that SFAs increase their paid meal prices regardless of their financial solvency. Congress should allow local flexibility by narrowing Section 205 to include only those SFAs that have a negative fund balance at the end of the previous school year.