Every school day, school nutrition programs contribute to the health, well-being and achievement of more than 30 million students across America. To sustain this success, school meal programs require greater support.

The School Nutrition Association (SNA) represents 57,000 professionals who serve students nutritious meals while being responsible stewards of federal funds. SNA urges Congress and the Administration to bolster historically under-funded school meal programs that are struggling to manage increased food and operating costs. While school meals should continue to meet robust federal nutrition standards, requirements must be streamlined to ease regulatory burdens and preserve the financial sustainability of school meal programs. Given the reality of the federal deficit and the absence of a Child Nutrition Reauthorization bill, SNA requests that Congress:

- **Oppose any effort to block grant school meal programs.** Block grants will cut funds and eliminate federal nutrition standards for school meals. Block grant funding caps will prevent schools from serving additional at-risk students when local economic downturns or rising enrollments increase the number of children eligible for free or reduced price meals. The non-partisan Congressional Budget Office (CBO) warned that block grants could “eliminate access to nutrition programs for some children and reduce it for others.”

- **Support schools, US farmers and students in the next Farm Bill by providing 6 cents in USDA Foods for every school breakfast served.** Currently, commodity support is only provided for school lunch. Expanding USDA Foods to support the School Breakfast Program will allow more students to benefit from a nutritious school breakfast, help schools cover rising costs and advance USDA’s mission of supporting America’s farmers.

- **Provide schools practical flexibility under federal nutrition standards to prepare healthy, appealing meals.** Overly prescriptive regulations have resulted in unintended consequences, including reduced student lunch participation, higher costs and food waste. Federal nutrition standards should be modified to help school menu planners manage these challenges and prepare nutritious meals that appeal to diverse student tastes. In particular, USDA should:
  - **Maintain the Target 1 sodium levels and eliminate future targets.** The Institute of Medicine warned that “reducing the sodium content of school meals as specified and in a way that is well accepted by students will present major challenges and may not be possible.” *(School Meals: Building Blocks for Healthy Children, 2010)*
  - **Restore the initial requirement that at least half of grains offered through school lunch and breakfast programs be whole grain rich.** The current mandate that *all* grains offered be whole grain rich has increased waste and costs, while contributing to the decline in student lunch participation. Students are eating more whole grain breads and rolls, but schools are struggling with limited availability of specialty whole grain items and meeting students’ regional and cultural preferences for certain refined grains, such as white rice, pasta, grits, bagels or tortillas.

- **Simplify regulations to improve efficiencies and provide $1 million to conduct an independent study of the federal Child Nutrition Programs.** Program complexities add to school nutrition costs. Duplicative and overly burdensome administrative mandates divert school nutrition professionals’ attention from their mission of nourishing students.

2017 Position Paper: Talking Points

- SNA represents 57,000 school nutrition professionals who plan, prepare and serve school meals.

- These meals are vital to the health and achievement of more than 30 million students every school day.

- SNA urges Congress to protect and bolster under-funded school meal programs that are struggling to manage increased food and operating costs.
  - School nutrition professionals are responsible stewards of federal funds.
  - We are expected to operate school meal programs as businesses, without relying on local school district funds.

- School meals should continue to meet robust federal nutrition standards. However, streamlining requirements can ease excessive regulatory burdens and preserve the financial sustainability of school meal programs.

- In the absence of a Child Nutrition Reauthorization bill, we request that Congress:

  **Oppose any effort to block grant school meal programs.**

- Block grants would dismantle the federal school meal program, essentially:
  1. restricting student access to healthy meals
  2. slashing funds, and
  3. abolishing federal nutrition standards.

  **Restricting student access:**
  - For 70 years, the US has ensured children have consistent access to healthy school meals. *Fixed-sum block grants eliminate that long-standing guarantee.*
    - When the number of children eligible for free or reduced price meals increases, no additional funding will be provided to feed students in need.
    - Even American families who need temporary assistance due to a natural disaster or business closure could be shut out.
      - The month after Hurricane Matthew decimated North Carolina homes, 40,000 students became eligible for free or reduced price meals.
      - Block grant funding could have left these students without meals too.
The non-partisan Congressional Budget Office affirms that block grants could “eliminate access to nutrition programs for some children and reduce it for others.”

**Slashing funds & abolishing standards:**
- Last year’s House-proposed block grant could have resulted in a crippling 12% funding cut after the third year of implementation (according to a Center on Budget and Policy Priorities analysis).
  - Cash-strapped school districts would be forced to cover meal program losses at the expense of academics.
- Funding cuts and the complete elimination of federal nutrition standards will compromise the quality of school meals for all students.
- Refer to Block Grant fact sheet for more information.

**Support schools, US farmers and students in the next Farm Bill by providing 6 cents in USDA Foods for every school breakfast served.**
- USDA Foods, or commodities, for breakfast would advance USDA’s mission of supporting America’s farmers. More children would enjoy a wider variety of American grown foods as part of a healthy school breakfast.
  - Currently, commodity support is only provided for school lunch.
- Expanding USDA Foods to support the School Breakfast Program would help schools cover rising costs and allow more students to benefit from a nutritious school breakfast.
  - Breakfast commodities could help schools invest in innovative breakfast in the classroom or grab-and-go programs, proven to increase breakfast consumption.
  - Research shows students who eat school breakfast perform better on standardized tests, and have improved classroom behavior and attendance.
- USDA estimated that meeting updated nutrition standards for school breakfast would increase expenses by **27 cents per breakfast**, yet schools received no additional funding to cover higher breakfast costs.
- Share your examples of how USDA Foods at breakfast would help you improve your menus and reach more students.
- Refer to USDA Foods fact sheet for more information.
Provide schools practical flexibility under federal nutrition standards to prepare healthy, appealing meals.

- SNA supports maintaining robust federal nutrition standards to ensure all students receive nutritious, well-balanced meals at school.

- However, some overly prescriptive rules have resulted in unintended consequences, including reduced student lunch participation, higher costs and food waste.
  - A recent report from The Pew Charitable Trusts and the Robert Wood Johnson Foundation found that despite strategies to promote healthier school meals, more than 60% of school nutrition directors faced challenges meeting the standards in the 2014/15 School Year.
    - Sodium and whole grain requirements were cited as the top challenges.

- Federal nutrition standards should be modified to help school menu planners manage these challenges and prepare nutritious meals that appeal to diverse student tastes.

In particular, USDA should:

*Maintain the Target 1 sodium levels and eliminate future targets.*

- Schools made significant sodium reductions to meet Target 1, effective July 2014.

- Before advancing to Target 2, the Institute of Medicine recommended assessing the impact of Target 1 and warned that “reducing the sodium content of school meals as specified and in a way that is well accepted by students will present major challenges and may not be possible.” *(School Meals: Building Blocks for Healthy Children, 2010)*

- Naturally occurring sodium present in meat, milk and other low-fat dairy foods will force schools to take nutritious choices off the menu, and drive more students away from healthy school meals.
  - Many schools have limited soups, Chef salads, low-fat deli sandwiches.
  - For instance, a small turkey wrap, served with milk and low sodium green beans, exceeds Target 2 sodium limits.
  - Share examples of your healthy menu options that don’t meet future sodium targets.

- The Government Accountability Office warned that forthcoming limits on sodium would remain problematic with cost and product availability making sodium targets difficult for many schools to implement.
Restore the initial requirement that at least half of grains offered through school lunch and breakfast programs be whole grain rich.

- SNA supports the July 2012 requirement that half of all grains offered with school meals be whole grain rich.
- However, the current mandate that all grains must be whole grain rich has increased waste and costs while contributing to the decline in student lunch participation.
- Students are eating more whole grain breads and rolls. But schools are struggling with limited availability of specialty whole grain items and meeting students’ regional and cultural preferences for certain refined grains.
- Schools should be permitted to serve white rice, pasta, grits, bagels or tortillas on occasion, just like most families do.

Simplify regulations to improve efficiencies and provide $1 million to conduct an independent study of the federal Child Nutrition Programs.

- Federal child nutrition regulations play an important role in ensuring the uniformity and consistency of school meal programs for students nationwide.
- However, the overwhelming complexity of child nutrition regulations and administrative requirements is unnecessarily hindering efforts to better serve students. Program complexities add to school nutrition costs.
  - The Government Accountability Office found that USDA issued nearly 4,700 pages of guidance on the updated standards between January 2012 and April 2015.
  - Schools spend an excessive amount of time reviewing policy memos and preparing paperwork in advance of the cumbersome Administrative Review process.
  - Duplicative and overly burdensome administrative mandates make inefficient use of school nutrition directors’ time, keeping them at their desks instead of in cafeterias, interacting with students and staff.
    - That time could be better utilized for program improvements, such as hosting student taste tests, planning nutrition education initiatives and improving cafeteria operations.
- An independent study of federal requirements would help identify key steps to simplify child nutrition programs and ease burdens on School Food Authorities and State Agencies.