



## 2014 Position Paper Talking Points

- Access to child nutrition programs remains a high priority for America's families in today's financially challenging environment.
- Under the new nutrition standards implemented in 2012, school meal programs have experienced increased costs and administrative burdens, while struggling with student acceptance of new menu items and increased plate waste.
- As a result, 1 million fewer students chose school meals each day. (*Source: USDA Fiscal Year 2012 & 2013 data*)
- According to SNA's 2013 Back to School Trends Report, 47% of school meal programs report that overall revenue declined in the 2012/13 school year.
- To strengthen child nutrition programs for the future, Child Nutrition Reauthorization 2015 should focus on:
  - *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.*

### **MEAL PATTERN FLEXIBILITY:**

**Retain the initial requirement that 50% of grains offered through school lunch and breakfast program be whole grain rich.**

- Currently half of all grains offered with school meals must be whole grain rich, but starting in July 2014, **all** grains offered with school meals must be whole grain rich.
- While many students have adjusted to whole grain rich breads, schools nationwide have struggled to find specialty whole grain rich items, such as tortillas, biscuits and pastas, that students accept. Challenges include limited availability of whole grain rich products in rural areas and strong regional preferences for refined grains such as white rice or tortillas.
- Schools have experienced increased plate waste, increased costs, and declines in student participation due to student rejection of specific whole grain products.
- Retaining the current requirement that 50% of grains offered are whole grain rich will ensure students continue to receive a variety of whole grain items, while limiting waste.
- The *2010 Dietary Guidelines for Americans* allows for limited consumption of 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.**

- Schools are already making significant reductions in the sodium on school menus to meet the first sodium reduction target, which goes into effect in July 2014 (see below).
- The Institute of Medicine states that before advancing to Target 2, “it would be appropriate to assess progress and effects of the actions on student participation rates, food cost, safety and food service operations to determine a reasonable target for the next period. The committee recognizes 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.” (Source: “School Meals: Building Blocks for Healthy Children”)
- Naturally occurring sodium present in milk, meats and other foods, make the later sodium targets extremely difficult to achieve. Popular and healthy choices such as low-fat, whole grain cheese pizza, macaroni and cheese and deli sandwiches could be stripped from school menus if manufacturers are unable to develop cheeses that meet these extreme standards.
- Many schools have already experienced increased plate waste, increased costs, and declines in student participation as they have transitioned to lower-sodium foods.
- Before school meal programs are forced to make additional costly changes, more scientific research should be done into the efficacy of further reducing children’s sodium intake.

**Sodium Reduction Target Timeline**

	Target 1 (July 1, 2014)	Target 2 (July 1, 2017)	Final Target (July 1, 2022)
School Breakfast Program			
Grades K-5:	≤540	≤485	≤430
Grades 6-8:	≤600	≤535	≤470
Grades 9-12:	≤640	≤570	≤500
National School Lunch Program			
Grades K-5:	≤1,230	≤935	≤640
Grades 6-8:	≤1,360	≤1,035	≤710
Grades 9-12:	≤1,420	≤1,080	≤740

**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.**

- Under the new meal pattern, school meal programs are offering larger servings and a wider variety of fruits and vegetables with school meals.
- However, some students simply do not want to take a fruit or a vegetable with their meal. Forcing students to take a food they don’t want on their tray has led to increased program costs, plate waste, and a decline in student participation.

- Through nutrition education programs, student taste tests and other cafeteria initiatives, schools are encouraging students to choose the produce available with school meals.

#### **COMPETITIVE FOODS:**

##### **Reopen and extend the comment period on the “Smart Snacks in School” Interim Final Rule until July 2015.**

- Recently, the USDA permanently repealed the weekly grain and protein limits originally established by the new meal pattern. The USDA acknowledged that these limits had created unintended problems when they were implemented.
- The new Smart Snacks in Schools rule, which goes into effect July 2014, is just as complex and challenging to implement as the new meal pattern. This competitive foods rule will also produce unintended consequences.
- Extending the comment period would allow stakeholders at all levels 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 or resources to effectively sustain the new three year administrative review cycle required under the Healthy, Hunger-Free Kids Act.
- The three year cycle has drastically increased the amount of time that state agency staff spend out of the office conducting site reviews.
- Returning to the five year administrative review cycle would increase the amount of time state agencies can dedicate to providing School Food Authorities (SFAs) support and guidance as they work to meet new standards.

##### **Address problem of unpaid meal charges.**

- School nutrition programs continue to experience an increase in the number of children who “charge” their school meals when parents fail to pay for school breakfast or lunch.
- As a result, some schools have accumulated substantial unpaid meal debts that can hamper their ability to meet nutrition standards for school meals.

- Currently, individual school districts must determine if students will receive alternate or unpaid meals, how many meals can be charged and how to handle meal charge debts.
- The USDA should fully implement Section 143 of the Healthy, Hunger-Free Kids Act (HHFKA). Section 143 requires the USDA to examine SFAs' current policies and practices pertaining to unpaid meal charges and report on the feasibility of establishing national standards for meal charges and the provision of alternate meals. Section 143 also recommends testing these standards through demonstration projects and fully implementing the standards.

#### **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 required many school districts to increase their paid meal prices regardless of their financial solvency.
- School meal prices, just like restaurant prices, differ greatly from one community to the next. When setting these prices, school boards must take into account local food and labor costs and what families are able and willing to pay.
- When school meal prices increase, even gradually, many students start packing lunch or buying off the super value meal at nearby fast food restaurants.
- School meal programs that are financially solvent should not be forced to raise prices on America's families.
- Congress should narrow Section 205 to include only those SFAs that have a negative fund balance at the end of the previous school year.