Dear Chairwoman Stabenow and Ranking Member Boozman:

As you consider the FY23 appropriations package, we—the undersigned organizations, representing school nutrition and foodservice professionals, district leaders, and school business officials—urge you to include critical child nutrition provisions that would meaningfully address the issues that school food authorities (SFAs) are experiencing in providing healthy meals to students and streamline programs to minimize administrative burdens.

Our members report every day on the ongoing challenges they face to ensure students have access to healthy, appealing meals. These recommendations, if enacted, would have a minimal financial cost, if any, but would significantly improve the day-to-day operations for school food authorities across the country.

- **Streamline meal pattern requirements across all nutrition programs in schools**—Meal pattern requirements are currently inconsistent among all child nutrition programs. Streamlined meal pattern rules would increase efficiency for districts and vendors to feed students; simplify the training process for nutrition staff to comply with requirements; and make it less burdensome for school nutrition workers to ensure kids have the correct servings for each meal. A new report by the Urban School Food Alliance (USFA) outlines recommendations to align nutrition standards across USDA programs for consideration.

- **Establish a single application for all federal nutrition programs in a single district**—SFAs that serve meals and snacks through the National School Lunch Program (NSLP), the School Breakfast Program (SBP), the Child and Adult Care Food Program (CACFP) and the Summer Food Service Program (SFSP) must complete detailed, redundant, and time-consuming annual applications to participate in each of these separate programs. A single application would streamline paperwork, eliminate redundancy, and reduce administrative burdens while maintaining program integrity and accountability. Cumbersome application processes are a significant deterrent for small, rural, and low-income districts, which often have limited staff to apply for and administer multiple nutrition programs; these districts are more likely to opt out of participating in certain programs because they don’t have the time or resources to fill out the paperwork.

- **Return to a 5-year Administrative Review Cycle**—School food service operators strive to be responsible stewards of federal funds and welcome efforts to ensure school meal programs fully comply with regulatory requirements. However, SFAs and State agencies that oversee these programs are overwhelmed by excessive reporting requirements required under the shorter three-year Administrative Review 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. As such, Congress must encourage USDA to return to a five-year cycle for SFAs that have consistently demonstrated 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 healthy meals.

- **Permanently waive paid lunch equity (PLE) pricing requirements for districts with break-even or positive food service balances**—Districts with nutrition programs that are operating at break-even/positive balances should have the authority to determine the price of paid lunches in their programs. PLE was created to ensure that districts don’t charge less for school meals than it costs to produce the meal, that federal funds aren’t subsidizing paid student meals, and that schools have sufficient funding to feed students nutritious meals. Districts that have already determined how to implement a financially sustainable model should have the flexibility to charge appropriate prices. We appreciate the temporary waiver authority granted by the FY22 Consolidated Appropriations Act (PL 117-103, Division A, Title VII, Sec. 752) for SY22-23 and believe it should be made permanent.

- **Maintaining the Keep Kids Fed Act (KKFA) federal meal reimbursement rates**—The increased reimbursement rates have been critical for SFAs as they face increased costs for food, supplies, and labor. Districts across the country are experiencing dramatically high prices for basic food purchases. For example, one large district in Virginia reported that the per unit cost of butter increased by $43 dollars compared to last year, while a small district in Oregon reported that boxes of disposable food prep gloves increased by $62 per unit. SFAs are challenged with budgeting for these increased costs when prices are highly volatile and unpredictable; they are not allowed to operate “in the red” and will have to take money from their general operating funds to continue their meal programs. This creates an opportunity cost as those funds could have been used for other educational services. We urge you to make the temporary increased reimbursement rate for lunch and breakfast for SY22-23 under the KKFA the permanent base rate moving forward to help keep food service programs financially sustainable.

- **Direct National Center for Education Statistics (NCES) to conduct a study on a new poverty indicator/metric for K–12 students**—For decades, policymakers and administrators have used Free and Reduced-Price Lunch (FRPL) data as a measure for student poverty. As more states move to universal school meals and more districts participate in the Community Eligibility Provision (CEP), it is important to recognize the impact these policies will have on FRPL Data and the ability of districts to allocate money to students who need more resources. It is critical that a poverty indicator is developed for schools that is separate from FRPL data. A study from NCES would initiate this important work and spark a necessary conversation on what a more reliable poverty indicator would look like.

- **Explore solutions to address unpaid meal debt**—Unpaid meal debt is a financial burden that most school districts face every year across the country. However, as SFAs transition back to paid lunches after two years of free universal meals and families’ budgets are more constrained due to inflation, unpaid meal debt has drastically increased. This debt often forces school districts to redirect funding from other educational services to make the nutrition program whole. We encourage Congress to establish a National Advisory Council on Unpaid Meal Debt to provide recommendations on how to address
unpaid school meal fees to ensure students are not stigmatized and that SFAs can maintain fiscal solvency and long-term viability of school meal programs.

As we stated in our October letter, we remain unwavering in our support for the expansion of the Community Eligibility Provision by lowering the threshold and increasing the multiplier. This letter was solely focused on provisions with no or minimal financial cost. We urge you to include these changes in the FY23 appropriations package and allow school nutrition professionals to focus on the important job at hand: ensuring students have access to the healthy meals they need to learn and grow.

Sincerely,

AASA, The School Superintendents Association
Association of School Business Officials International (ASBO)
National Rural Education Advocacy Coalition (NREAC)
School Nutrition Association
Urban School Food Alliance