

May 17, 2016

Education and the Workforce Committee
United States House of Representatives
Washington, D.C. 20510

Dear Representative:

On behalf of AASA, The School Superintendents Association, representing 13,000 school system leaders throughout the country, I am writing to offer our views on the Child Nutrition Reauthorization bill to be considered by the House Committee on Education and the Workforce. We applaud the committee for their work to improve on the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) and endorse the bill.

AASA and the superintendents we represent recognize that a child must be fed before she/he can learn. Superintendents are keenly aware of the critical role nutrition plays in cognitive development and academic performance in children; a hungry, undernourished child is more likely to be less energetic and less able to concentrate. You can't develop an achieving student when you have a hungry child. We acknowledge the role that our nation's school nutrition program has played in reducing hunger, preparing students to be ready for school and learning, and supporting and promoting student health and wellness. Providing healthy meals and snack options for school children is critical; our members are proud of their strong nutrition programs and are looking for a reauthorization that provides districts with increased flexibility from certain elements of the HHFKA.

Our priorities in this reauthorization were to address the financial and administrative burden put on districts in the 2010 reauthorization. We are opposed to a repeal of the HHFKA because while there are elements of the bill that are burdensome or stand room for improvement, the reality is that school systems have invested great amounts of time and energy in implementing the programs they successfully run today, and a complete repeal would do far more harm than good. AASA is pleased with the inclusion of a three cent per meal reimbursement increase in the school breakfast program. This is a crucial investment in our students' nutrition and health.

AASA also supports the bill's focus on the areas in the nutrition standards that may be adding unforeseen burdens on schools. The review of these standards takes the politics out of the standards and will alleviate the burden while focusing on nutrition. AASA applauds the flexibility given in the rules around the sale of items a la carte and in the exemption of the meal pattern requirements for family meal days, which encourage strong family and community engagement. The bill also removes the paid meal equity rules, giving schools and districts more control over paid lunch prices and allowing them to price meals to best serve their community needs.

The largest change in the school nutrition program is a rethinking of verification of school meal applications. While many schools would see an increase in the numbers of students whose eligibility

would need to be verified, the bill includes a provision allowing schools to demonstrate increased administrative burden for a reduction in verification. The new system rewards districts that have been successful in improving certification of eligibility and number of responses from families and will allow some districts' verification requirement to drop below current levels. It also allows for the use of Education Service Agencies or other consortia groups to perform the verifications, reducing the burden on schools and districts. However, it would most strongly hurt the schools currently struggling the most, which could lead to large numbers of students in those schools being removed from the school lunch program and left hungry and food service directors left to spent many hours on the verification that could be better spent. AASA understands the need to combat waste and to strengthen the integrity of the school nutrition program, and would recommend the provision of additional funding for the increased administrative burden that would stem from this requirement of increased verification.

AASA is a strong supporter of the Community Eligibility Provision, which allows high-poverty schools or districts to serve breakfast and lunch to all students, without applications. AASA has long supported increasing breakfast availability and providing breakfast to all students through our Alternative School Breakfast programs, and has encouraged districts to enroll in CEP to ensure all students have access to healthy food in the morning. CEP has helped schools and districts across the country reduce administrative burden and improve students' nutrition. AASA opposes the change in this bill from the current threshold of 40 percent of families eligible for free meals to 60 percent. This will harm many schools and districts currently operating successful school- and district-wide nutrition programs and will cause students in high-poverty communities to lose access to these successful nutrition programs.

The bill does contain several elements that would reduce the administrative burden on schools and districts. The audit of school nutrition program, now performed every three years, would be required only every five years, reducing the time and burden of these audits. The bill also streamlines the data collected and includes a review of paperwork currently required. These changes would allow schools and districts to better spend time improving their programs.

We look forward to working with the House as the bill moves through committee and to the floor and will work to ensure the final bill retains elements that will strengthen school nutrition, while addressing the issues around increased verification, the change in Community Eligibility Provision threshold, and the state flexibility pilot. If you need additional assistance, please do not hesitate to contact me at 703-203-3105 or lfinnan@aasa.org.

Sincerely,

A handwritten signature in black ink that reads "Leslie Finnan". The signature is written in a cursive, flowing style.

Leslie Finnan
Senior Legislative Analyst