



**Feeding Bodies. Fueling Minds.™**

August 21, 2017

Ms. Hilary Malawer  
Assistant General Counsel  
Office of the General Counsel  
U.S. Department of Education  
400 Maryland Avenue, SW  
Room 6E231  
Washington, DC 20202

Dear Ms. Malawer:

On behalf of the 57,000 members of the School Nutrition Association (SNA), we appreciate this opportunity to submit comments to the U.S. Department of Education (USDOE) on the posting in the Federal Register of June 22, 2017, *Evaluation of Existing Regulations*, Docket ID; ED-2017-OS-0074. While the National School Lunch Program (NSLP), School Breakfast Program (SBP) and other federal school-based child nutrition programs are administered by the U.S. Department of Agriculture (USDA), individual programs are operating in more than 100,000 schools across the country. The work of SNA members takes place in an education setting—through meal service dining areas—and plays an important role in supporting the successful academic outcomes of students.

The increasing concern for improved educational achievement challenges our nation to acknowledge the link between nutrition and education and the importance of providing all students with access to nutritionally adequate meals at school as part of the total educational experience. A growing body of research documents the positive contributions of school nutrition programs to the health and education of children.

But student access to school nutrition program benefits is frequently limited, for at least two primary reasons: (1) a lack of commitment by key stakeholders in the local school and community to participate in available programs; and (2) a variety of barriers within the school that inhibit student participation.

The sustained efficiency and effectiveness of school nutrition programs needs to be supported by all educators and administrators committing to help reduce barriers inherent in current education models and with the consideration of the impact of societal environments. Various factors to note include: the meal service environment (especially dining area seating capacity); daily school schedules designed to allow for student access to meal service for breakfast, lunch and, as applicable, snacks; adequate time for school meals; school meals program food sales outside of the school; access and eligibility support including the income verification process complexity and language/literacy challenges; and, instructional time overlapping the breakfast in the classroom meal service model.

Of note, the language stipulated in Title 1, PART A - IMPROVING BASIC PROGRAMS OPERATED BY LOCAL EDUCATIONAL AGENCIES, Section 1118, Parental Involvement should include an emphasis on supporting healthy eating practices by students in school and at home and the regulatory guidance should direct stakeholders to coordinate plans with USDA-required local Wellness Policies in order to streamline district requirements. Participation and ready access to the NSLP and SBP should be listed along with Head Start Programs and the like mentioned in the legislation.

As many educational programs look for information on 'the economically disadvantaged' student and use the Free and Reduced-Price Meal Income Eligibility Guidelines, it would be helpful to students and families to support and engage in an outreach process designed to ensure that households in need are being provided all services available to them – including nutritious school meals. The collaboration and cooperation demonstrated between USDOE and USDA during the implementation of the Community Eligibility Provision (CEP) should be expanded to other areas that can benefit from streamlined administrative processes and minimized burdens for all.

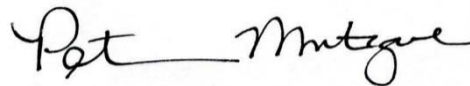
The provision of nutritious, appealing meals to students within the education setting is an integral component of student success, and this is the mission of SNA's members. Access to school meal programs by all children—regardless of income—is essential in establishing healthy eating behaviors, nourishing students during the school day and lessening the burden on busy families. In addition, access ensures that students who experience struggles at home are regularly provided with an invaluable meal.

Thank you again for the opportunity to respond and submit these comments.

Sincerely,



Dr. Lynn Harvey, RDN, LDN, FAND, SNS  
President



Patricia Montague, CAE  
Chief Executive Officer