



Support USDA's ongoing effort to streamline overly complex child nutrition programs.

The overwhelming complexity of federal child nutrition program regulations and burdensome administrative requirements hinder efforts to better serve students. Streamlining regulations will minimize costs and allow school nutrition professionals to spend more time and resources in the cafeteria, interacting with students, hosting taste tests, planning nutrition education initiatives and improving menus and operations.

In January 2020, USDA released [proposed regulations](#) intended to simplify meal service and monitoring requirements in the National School Lunch and School Breakfast Programs. The School Nutrition Association's (SNA) [comments](#) in response to the proposed rules support the recommended changes, notably:

- **A return to the [5-year Administrative Review cycle](#)** for school meal programs that consistently operate in compliance with federal regulations: The congressionally mandated [Child Nutrition Reporting Burden Analysis Study](#) recommended a risk-based review cycle to maintain accountability while reducing onerous paperwork and administrative requirements.
- **Proposals to simplify meal service:** [Current school meal flexibilities](#) eased school menu planning challenges while preserving strong nutrition standards to benefit students. Likewise, this proposed rule would protect caps on calories and saturated fat, which ensure school meals do not contribute to obesity, and preserve Target 1 sodium reductions. ***The proposal would maintain daily and weekly vegetable portion sizes and mandates that schools offer a wide variety of vegetables with school meals, including weekly offerings of dark leafy greens, red/orange vegetables and legumes.*** Key proposed changes include:
 - **Vegetable subgroups:** Current subgroup requirements place a disproportionate emphasis on [red/orange vegetables](#) the subgroup offering the fewest choices, resulting in the same vegetables being served several times each week. This effectively limits efforts to menu more seasonal and locally grown foods and introduce students to unfamiliar vegetables. The proposed change will allow schools to offer more vegetables from the ["other"](#) category, the largest subgroup featuring a vast array of options that range from student favorites like green beans, sugar snap and snow peas, to vegetables many students haven't been exposed to, such as avocados, squash, beets and radishes.
 - **Protein at breakfast:** Under current rules, a meal of scrambled eggs served with milk and fruit does not meet federal standards, as schools are required to offer a grain with every breakfast. With limited budgets, many schools cannot afford to offer protein rich foods in addition to the required grain each school day. By eliminating the minimum grain requirement for breakfast, the proposed rule will allow schools to offer more lean protein options, like eggs, yogurt, low fat cheese and turkey sausage, to keep students satiated throughout the morning.
 - **Breakfast fruit requirements:** Schools must offer students two servings (a full cup) of fruit with every breakfast. In the cafeteria, students can choose to take just one serving, but when breakfast is served in grab-and-go breakfast bags from hallway kiosks or in the classroom, students must take the full cup. Whether a student wants just a single serving or doesn't have time to eat two servings of fruit, the requirement leads to unnecessary food waste. This proposed change would give schools struggling with excessive waste the option to serve a half cup of fruit when breakfast is offered outside of the cafeteria.
 - **Substituting vegetables for fruit at breakfast:** Fruit is still the popular choice for breakfast sides. However, schools wanting to increase variety in menu options should be allowed to substitute a vegetable on occasion, without having to serve dark leafy greens, legumes and red/orange vegetables with breakfast.
 - **A la carte sales:** Entrees and sides that already meet strict nutrition standards for school meals should be allowed for a la carte purchase any day of the week. The proposed rule would help ensure students can choose from a variety of healthy options in the cafeteria, including items like chef salads, vegetables paired with dip, deli sandwiches and soups, often [prohibited](#) under Smart Snack standards.