



2021 Position Paper

Reduce regulatory and administrative burdens.

Overly complex federal regulations divert resources from the mission of serving students. Streamlining regulations will minimize costs and allow school nutrition professionals to dedicate more time and resources to directly benefit students, e.g., hosting taste tests, planning nutrition education initiatives and enhancing menus and supporting efficient operations.

When COVID-19 prompted unexpected school closures in March 2020, efforts to quickly mobilize grab-and-go services to maintain consistent student access to healthy school meals were hampered due to [complex regulatory challenges](#). More than 60 regulatory waivers were required to ensure child nutrition programs could safely serve students throughout the pandemic. Excessive rules should not impede efforts to quickly and creatively respond to student needs.

SNA urges Congress to direct USDA to streamline regulatory burdens on child nutrition programs, beginning with implementation of the congressionally-mandated [Child Nutrition Reporting Burden Analysis Study](#) recommendations.

Whole Grain, Sodium and Milk Regulations for National School Lunch and School Breakfast Programs

Congress and USDA should also preserve flexibility on [whole grain, sodium and milk regulations](#) to continue to ease menu planning and procurement challenges for school nutrition programs. This flexibility preserves strict nutrition standards to benefit students, including Target 1 sodium reductions and limits on calories and fat, which ensure school meals do not contribute to obesity. School meals continue to provide students access to a wide variety of fruits, vegetables and whole grains.

School nutrition professionals rely on regulatory flexibility to help them plan nutritious school meals that appeal to students in their communities. Schools [struggled](#) to meet the 2012 mandate that *all* grains must be whole grain rich due to regional and cultural preferences for a few specific items like white rice, tortillas or pasta. Schools also [reported](#) widespread concerns about the availability of foods that will meet future sodium limits and are accepted by students. Even the Institute of Medicine [warned](#) that meeting later sodium targets in a way that is well accepted by students may not be possible.

These flexibilities will be especially important in SY 2021/22 as COVID-19 related supply chain and economic disruptions will make it even more difficult to order and secure foods that meet highly specialized school nutrition standards. Smaller school districts and those in rural areas with limited purchasing power or access to distribution channels already have few options when selecting menu items. Preserving regulatory flexibility will ease these challenges while ensuring students continue to receive well-balanced nutritious meals.