



Feeding Bodies. Fueling Minds.™

July 10, 2020

The Honorable Sonny Perdue
Secretary
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Dear Mr. Secretary,

On behalf of School Nutrition Association's (SNA) more than 55,000 members, thank you for your ongoing efforts to support school nutrition professionals working to combat childhood hunger during the pandemic so America's students are nourished and ready to learn. We appreciate the U.S. Department of Agriculture's (USDA) quick response to SNA's [June 4th letter](#) and urge continued support to provide regulatory flexibility for school meal programs, operating in an emergency situation in School Year (SY) 2020/2021. Unfortunately, the waivers USDA issued on [June 25](#), while helpful, are insufficient to address the complex and cumbersome regulatory hurdles and operational challenges school meal programs will face due to impacts of the pandemic.

After schools closed unexpectedly in mid-March, USDA issued critical [waivers](#) to allow school meal programs to safely meet students' nutritional needs through the Summer Food Service Program (SFSP) and Seamless Summer Option (SSO). **USDA's requirement for school meal programs to operate the National School Lunch Program (NSLP) and School Breakfast Program (SBP) during this unprecedented upcoming school year greatly complicates meal service, raising the risk of COVID-19 exposure during meal distribution, and increasing costs and waste for school meal programs while reducing federal reimbursements for meals served.**

We respectfully request USDA take swift action to guarantee consistent, safe and equitable student access to healthy school meals and ensure school meal programs are fiscally sustainable. SNA urges USDA to allow school meal programs to continue serving students through SFSP/SSO and to immediately extend all SFSP/SSO COVID-19 waivers, including Area Eligibility waivers, through the end of SY 2020/2021. Allowing all schools to offer breakfast and lunch to all students at no charge is the most effective way to ensure meals are served safely and sustainably during the pandemic. We also request waiving vegetable subgroup requirements for SSO, given procurement and offer versus serve challenges during the pandemic. In addition, a one-year delay in the Administrative and Procurement Review cycle would allow State agencies to focus on helping school meal programs through this emergency.

Under NSLP/SBP, overwhelmed schools will struggle to quickly enroll millions of newly eligible students in the free and reduced-price meal program – an application and verification process already fraught with challenges. Needy families have received school meals at no charge since March and rely on this continued benefit as they struggle financially in this time of record unemployment. Schools anticipate a significant increase in the number of children unable to pay for their meals during distribution.

The logistics of checking student eligibility and collecting payments under NSLP/SBP meal distribution are inherently risky. School nutrition staff are exposed to hundreds of students, sometimes twice a day; having them handle money from students or utilize a touch-pad payment system puts both students and staff at increased risk.

Schools with curbside pick-up for distance learners or classroom meal delivery must determine how to relocate their Point of Sale (POS) systems, but many lack sufficient WIFI access or mobile devices for use outside of the cafeteria. School nutrition staff may be forced to utilize paper rosters, further slowing meal distribution and increasing contact. **Allowing schools to serve meals to all students at no charge will speed up service, reduce risk of disease exposure and ensure eligible students have consistent access to free meals without being overtly identified as needy in front of their peers.**

Returning to the lower NSLP/SBP reimbursement rates and more stringent meal pattern requirements during the pandemic will also present insurmountable challenges for school meal programs this coming school year. Preliminary [USDA data](#) shows programs received \$300 million less in federal reimbursements in March 2020 compared to March 2019. Forthcoming data for April and May are likely to reveal an even greater loss in reimbursement. A [recent SNA survey](#) affirms school meal programs reported widespread financial losses due to COVID-19 school closures.

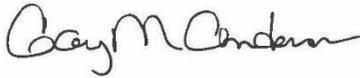
With no consistent federal funding support outside of reimbursements, the higher SFSP reimbursement rate is critical to helping school meal programs cover the increased cost of serving meals during the pandemic. These programs will assume new costs associated with Personal Protective Equipment (cleaning agents, sanitizers, masks, gloves, etc.) and increased labor costs. Schools serving students in the classroom or through curbside pick-up face the added expense of meal packaging and equipment to transport meals for distribution.

NSLP/SBP meal pattern requirements are much more expensive to meet, particularly for grab-and-go meals where offer versus serve is not an option for controlling costs and limiting food waste. Vegetable subgroup requirements are especially problematic for grab-and-go, as many of the required offerings are not foods that schools can obtain Individually Wrapped (IW) or that hold up well when packaged with multiple days' worth of meals. USDA frequently acknowledges the challenge of meeting complex NSLP/SBP meal pattern requirements and the need for regulatory flexibility. Allowing school meal programs to follow SFSP meal pattern requirements for SY 2020-21 will help schools control costs, reduce waste and plan menus that can be served as grab-and-go meals, in the classroom or the cafeteria.

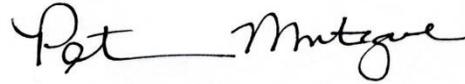
COVID-19 financial losses have wiped out school meal program reserves. Schools anticipate a continued decline in meal participation and revenue when millions of students participate in distance learning and have limited access to meals. Additionally, schools must limit menu options for classroom meal service and social distancing measures in the cafeteria. To preserve the financial sustainability of school meal programs and continued student access to healthy meals, USDA must take quick action. Allowing schools to serve meals to all students at no charge through SFSP and SSO and extending the SFSP/SSO waivers through next school year will achieve these critical goals and ensure programs are prepared to meet the nutrition needs of students in the event of unanticipated school closures due to COVID-19 outbreaks. To ensure equitable student access, waivers must be applied consistently across all USDA regions and states.

Mr. Secretary, thank you for your commitment to school nutrition professionals and their efforts to nourish America's future generations. We appreciate your consideration and support for these programs, which are crucial to the nation's public health response to the pandemic.

Sincerely,



Gay Anderson, SNS
President



Patricia Montague, CAE
Chief Executive Officer

cc: The Honorable Betsy DeVos
The Honorable Mitch McConnell
The Honorable Nancy Pelosi
The Honorable Pat Roberts
The Honorable Debbie Stabenow
The Honorable John Hoeven
The Honorable Jeff Merkley
The Honorable Bobby Scott
The Honorable Virginia Foxx
The Honorable Sanford Bishop, Jr.
The Honorable Jeff Fortenberry