



Feeding Bodies. Fueling Minds.™

June 4, 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 professionals working on the frontlines to nourish America's children during the pandemic, the School Nutrition Association (SNA) thanks the U.S. Department of Agriculture (USDA) for its support and urgently requests ongoing assistance and regulatory flexibility for school meal programs preparing to serve students this coming school year.

For more than 74 years, SNA has advocated for school meal programs and the students they serve. Today, our more than 55,000 members nationwide face unprecedented challenges that threaten the sustainability of these programs at a time when, due to rising unemployment, more families depend on school meals to nourish their children. USDA must act to preserve these programs, which play a critical role in the public health response to the pandemic and combatting chronic child hunger.

SNA greatly appreciates USDA's efforts to provide school meal programs with necessary regulatory flexibility as they transitioned from cafeteria service to curbside pickup and worked to ensure student access to emergency meals. ***Given the tremendous challenges and uncertainty still facing school meal programs, USDA must immediately extend COVID-19 waivers through the end of School Year (SY) 2020/2021 and provide all students school meals at no charge to guarantee they are nourished and ready to learn.***

Schools are considering vastly different learning models for the upcoming school year and urgently need answers now to plan modified school meal service based on what will be permissible under USDA regulations. School meal program directors must procure and place food, supply and equipment orders today to ensure industry has adequate time to supply schools to meet these needs this fall.

Distance learning would require the continuation of emergency feeding programs. Serving meals in classrooms rather than the cafeteria, as suggested by the Centers for Disease Control and Prevention (CDC), would require changes to menus and procedures, as well as investments in new equipment, technology and supplies. School meal programs may be asked to operate multiple service models simultaneously, serving some students in the cafeteria, some in the classroom and others via grab-and-go pick up or meal delivery. These plans could be upended by a second wave of the coronavirus, requiring schools to quickly switch service models at any point.

Meanwhile, staffing remains a challenge as school meal programs strive to maintain social distance among the professionals preparing and serving meals. Additionally, school meal programs, distributors and food companies all continue to report a wide range of procurement and distribution disruptions and higher costs, which are likely to persist as schools modify meal service models.

An overall decline of revenue for school meal programs due to COVID-19 closures has left most School Food Authorities (SFA) with a critical lack of funds to meet these shifting demands and the ability to restock school kitchens for the coming school year. In a [recent SNA survey](#), over 90% of responding school meal program directors anticipate a financial loss (68%) for their programs for SY 2019/2020 or are uncertain about financial losses (23%). Among the 861 school districts estimating their financial losses, combined total losses exceeded \$626.4 million.

To ensure students' consistent access to healthy school meals in the face of these challenges, USDA must act quickly and provide school meal programs and industry clear guidance and maximum regulatory flexibility for the entirety of the upcoming school year. SNA urges USDA to allow school meal programs to continue serving students through the Summer Food Service Program (SFSP) or Seamless Summer Option (SSO) next school year by immediately extending the following COVID-19 waivers to the end of SY 2020/2021 and waiving vegetable subgroup requirements for SSO given procurement and offer versus serve challenges during the pandemic:

- [Unexpected School Closures](#)
- [Nationwide Meal Times Waiver](#)
- [Nationwide Non-congregate Feeding Waiver](#)
- [Nationwide Afterschool Activity Waiver](#)
- [Nationwide Meal Pattern Waiver](#)
- [Nationwide Parent/Guardian Meal Pick-Up Waiver](#)
- [Fresh Fruit and Vegetable Program \(FFVP\) Parent Pick Up Waiver](#)
- [Nationwide Waivers of Child Nutrition Monitoring](#)
- [Nationwide Waiver of Food Management Company Contract Duration Requirements](#)
- [Nationwide Waiver of Local School Wellness Assessments](#)
- [Area Eligibility](#): SNA also requests a **nationwide** waiver of SFSP/SSO Area Eligibility requirements, which limit "open site" meal service to areas where at least half of the children in the area are eligible for free or reduced-price meals.

With more than 40 million Americans filing for unemployment since COVID-19 closures, far more students will qualify for free and reduced-price school meals this fall, but distributing and processing applications for newly-eligible families is a herculean task for overburdened schools. **USDA should allow all schools to provide universal meals this coming school year - breakfast and lunch for all students at no charge.** Universal meals during this challenging time will ensure children are fueled for learning, minimize regulatory and paperwork burdens on schools and families, and support efforts to maintain social distancing during meal distribution.

School meal programs also depend heavily on USDA Foods to reduce meal costs and offer students a wide range of U.S. grown foods. SFAs should be allowed to carryover any unused entitlement balances from SY 2019/2020 to SY 2020/2021, and USDA should utilize lunch participation data from SY 2018/2019 when calculating state entitlement values.

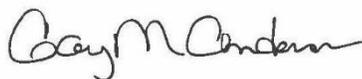
In light of President Trump's recent [Executive Order](#) to provide regulatory relief to speed the nation's pandemic recovery, USDA should consider all means to minimize regulatory burdens on school meal programs this coming school year, including, but not limited to meal pattern flexibilities and extensions of professional standards, administrative and procurement review timelines.

SNA recommends USDA form a Program Sustainability Task Force to provide insight and direction on managing the impact of the COVID-19 crisis on school meal programs. This advisory group, comprised of school meal program operators, State agency staff and industry experts could meet monthly to advise on critical concerns and solutions.

Mr. Secretary, through your role on the White House Coronavirus Task Force, we urge you to bring these key issues to the White House's attention. SNA would welcome the opportunity to meet with you and President Trump to discuss these urgent concerns and the need to ensure students continue to have access to healthy meals that support academic achievement.

Thank you for your consideration and many efforts on behalf of America's schoolchildren.

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