



September 8, 2015

Senator Pat Roberts, Chairman,
Senate Committee on Agriculture, Nutrition,
and Forestry
109 Hart Senate Office Building
Washington, DC 20510

Senator Debbie Stabenow, Ranking Member,
Senate Committee on Agriculture, Nutrition, and
Forestry
731 Hart Senate Office Building
Washington, DC 20510

The Honorable John Kline, Chairman,
House Education and The Workforce Committee
2439 Rayburn House Office Building
Washington, DC 20515

The Honorable Bobby Scott Chairman,
House Education and The Workforce Committee
1201 Longworth House Office Building
Washington, DC 20515

Dear Senators Roberts and Stabenow and Representatives Kline and Scott:

RE: California's Education Priorities –School Nutrition Programs

On behalf of the Association of California School Administrators (ACSA) and California School Boards Association (CSBA), we are writing to share our joint priorities and recommendations for reauthorization of the Child Nutrition Act of 1966 and the Richard B. Russell National School Lunch Act. Our members – over 17,000 school leader members and 5,000 locally-elected school board members -- share your desire to make sure that these important federal laws are updated and fine-tuned to better meet the needs of the more than 6.2 million students served by public schools throughout our state.

Every school day, in every community of our state, school staff carry out the important duty of providing students with nutritious meals and snacks, opportunities for physical activity, and safe and supportive learning environments. The National School Lunch and National School Breakfast Programs have long played an important role in these efforts. The Healthy, Hunger-Free Kids Act of 2010 put in place a number of program improvements. Among them, we commend and urge Congress to maintain through reauthorization the following:

- **Expanded access.** The simplification of the direct certification process, the automatic certification of foster children, and the establishment of community eligibility have enabled us to serve more students with nutrition needs and, at the same time, have lessened the application and enrollment burdens put on school staff and parents.
- **Equity in school lunch pricing.** By requiring schools to assess and address gaps in the price students are charged for paid meals relative to free and paid meal reimbursement rates, and setting revenue expectations for non-reimbursable foods sold at schools, the Act is helping schools and districts strengthen program transparency and efficiency.

- **Promoting strong school policies.** While requiring that sound nutrition policies be developed and implemented at the local level, the Act allows for local flexibility and community-level decision-making.

Reauthorization presents an important opportunity to build on these positive changes and to ensure that federal law appropriately addresses shortcomings in law and policy. Many of the most significant challenges our members have faced in implementing the Act stem from the establishment of national nutrition standards. There is inherent tension in the desire to have a national baseline when the needs and contexts of communities are so different. During the child nutrition hearing held by the Senate Committee on Agriculture, Nutrition, and Forestry in May, school nutrition professionals and others shared first-hand accounts of some of the challenges schools are experiencing due to the additional bureaucracy and rigidity that has resulted from federal law and policy.

Above all, we ask you to ensure through reauthorization that the school meal programs remain valuable tools for addressing child nutrition while attending to the unintended consequences of federal overreach. Specifically, we recommend the following:

- Maintain the authority granted to USDA regarding the establishment of nutritional standards for all foods sold in schools, while establishing clear expectations for easing administrative burdens and maximizing program flexibility and efficiency. The complexity of current regulations and program requirements often hinder local efforts to serve our most needy students.
- Require targets for sodium level reductions and whole grain offerings that reflect best practice as well as the lessons learned about regional food preferences, reasonable transition timelines, and other challenges.
- Expand efforts to ensure the financial sustainability of school meal programs, including through further increases in the per meal reimbursement rate. We join the School Nutrition Association in calling for at least a minimum of a 35 cent increase in the reimbursement rate.
- Help schools and districts reduce program waste and costs, both of which have significantly increased under the Act, by increasing local flexibility in setting policies that currently require students to take a fruit or vegetable with each meal and dispose of it if not consumed during lunch, limiting the ability of schools to make these and other healthy food options available to students throughout the school day.

Because child nutrition outside of the school day is also of critical importance, we support efforts to strengthen the Child and Adult Food Care Program, including proposals to expand the program to cover three meals per day and reducing the eligibility test to 40 percent of residents living below the poverty line.

Thank you for carefully considering our recommendations. We would be pleased to respond to any questions you or your staff may have about these ideas.

Sincerely,



Erika K. Hoffman
Legislative Advocate
California School Boards Association



Laura Preston
Legislative Advocate
Association of California School Administrators