



## **Child Nutrition Reauthorization (CNR) Recommendations**

Healthy school meals improve child nutrition and wellness, reduce childhood hunger, promote healthy weight in childhood, enhance child development and school readiness, and support learning. Given that the pandemic has worsened food and nutrition insecurity and the risk of excess weight gain, particularly for children in BIPOC communities, Congress must ensure that that all children have the nutrition they need to grow up healthy.

### **As members of the National Alliance for Nutrition and Activity (NANA), the undersigned organizations support the reauthorization of child nutrition programs that:**

- Protects and strengthen evidence-based nutrition standards for school meals and other foods sold in schools;
- Provides technical assistance and mandates public reports on progress to support schools in meeting the evidence-based standards;
- Strengthens, expands, and protects access to child nutrition programs;
- Supports and strengthens other programs and policies that help schools be successful in providing nutritious school foods; and
- Supports and strengthens strong, comprehensive, culturally appropriate, and well-coordinated nutrition education programs.

### **Recommendation: The USDA and Congress must protect and strengthen evidence-based nutrition standards for school meals and other foods sold in schools.**

The pandemic has worsened nutrition insecurity, so now more than ever, school nutrition standards need to be strong and evidence-based. Schools are currently required to meet the nutrition standards rule from 2012 (77 FR 4088, January 26, 2012); however, the rule is now outdated by the latest nutrition science. Congress must protect the nutrition standards from further rollback attempts and support the U.S. Department of Agriculture (USDA) in its work to ensure children get the healthiest food possible.

- The USDA must initiate a rulemaking to:
  - Update the timeline for meeting the sodium-reduction targets and craft a fourth reduction target to align with the latest *Dietary Guidelines for Americans* (DGA), taking into account that more time may be needed post-pandemic to achieve these goals;
  - Restore the 100 percent whole-grain-rich requirement;
  - Restore the limit on flavored 1 percent (low-fat) milk or implement a calorie limit consistent with expert recommendations. An added sugars standard for school meals would also help address excessively sugary flavored milks; and

- Consistent with the DGA, establish an added sugars standard for school meals and replace the total sugar standard with an added sugars standard for competitive foods.
- Congress must oppose efforts that weaken evidence-based school nutrition standards. Legislating requirements for specific nutrients or carving out specific food items sets a precedent that serves to undermine the integrity of school meals.

**Recommendation: The USDA and Congress must address the immediate outstanding needs of schools and students due to COVID-19.**

In the Families First Coronavirus Response Act, Congress provided the USDA the authority to waive nutrition standards as appropriate to accommodate supply chain disruptions related to COVID-19. The USDA released a memo in August 2020 that notified schools that they no longer needed to document food system disruptions, which is inconsistent with federal law. While the majority of state agencies self-reported in a [survey](#) two months after the policy change that they are still requiring schools to document reasons for these waivers (*e.g.*, COVID-related supply chain, packaging, or distribution issues), it is unclear if that trend will continue. The USDA must ensure that school meals remain nutritious, particularly through the pandemic and economic downturn, as they may be the only healthy meals children receive each day.

- The USDA must ensure schools continue to document reasons for use of these waivers in order to provide robust technical assistance and help schools transition back to meeting the meal patterns when schools go back to in-person learning.
- Congress must provide funding relief for school nutrition and the Child and Adult Care Food (CACFP) program operators to cover costs incurred during the pandemic response. School nutrition and childcare programs rely on reimbursement from meal service to pay for expenses. Many school districts and childcare sites across the country maintained the same or incurred higher expenses than normal (*e.g.*, labor, transportation to reach children when not physically in school) while seeing a significant decrease in revenues from reduced meal participation. We appreciate that Congress provided funding for school food service authorities and childcare providers to help cover COVID-related emergency operational costs from March-June 2020, making up for budget shortfalls due to pandemic-related declines in child nutrition program participation. However, more is needed to sustain these essential feeding programs, including extending the relief funding through at least June 2021.
- We support the USDA's extension of the meal pattern waivers via the National School Lunch Program's Seamless Summer Option (SSO), which has the same nutrition standards as the National School Lunch Program, rather than through the Summer Food Service Program (SFSP) through June 2022, and that school districts are required to opt into these waivers. Schools will also be able to get a higher reimbursement for serving the meals (meals served through SSO are reimbursed at the free rate which is slightly lower than the SFSP rates).

**Recommendation: The USDA and Congress must provide technical assistance and public reporting to support schools in meeting the nutrition standards.**

- Congress must increase the performance-based reimbursement from seven cents to ten cents.
- Congress must provide at least \$20 million total in funding (\$10 million for third-party competitive technical assistance grants and \$10 million for state agencies) for robust technical assistance to aid schools in meeting the sodium, whole grain-rich, and (once established) added sugars standards. The FY2021 agriculture appropriations bill provided \$1 million for sodium-reduction technical assistance.
- The USDA must reinstitute technical assistance trainings and peer-to-peer convenings such as *Team Up for School Nutrition Success*; initiatives focused on certain standards such as *What's Shaking in School Meals?* for sodium and create a similar one for whole grains and added sugars; and recognition programs such as the *HealthierUS School Challenge*.
- The USDA must summarize and assess the materials, trainings, and other products developed through Team Nutrition funding and other federal nutrition education programs and disseminate best practices to schools about how to use these resources effectively.
- The USDA and Congress must support efforts to make policy, systems, and environmental changes to maximize the impact of nutrition education and promotion efforts.
- Congress must require a report on the USDA's technical assistance efforts on sodium, whole grain-rich, and added sugars. This should include progress by schools to meet the standards and efforts by the USDA to work with industry to provide products that meet the standards. Similar language was included in the FY2021 House agriculture appropriations bill.
- Congress must require greater transparency from the USDA for nutrition standards compliance such as requiring the USDA to annually post the seven-cent certification data for schools. The USDA last publicly posted this data in 2016, after years of updating these figures quarterly.

**Recommendation: The USDA and Congress must strengthen, expand, and protect access to child nutrition programs.**

- *Make healthy school meals for all permanent, for example by including the Universal School Meals Program Act (S. 1530/H.R. 3115).*  
Currently through the COVID waiver process, programs can provide school meals for all children regardless of their family's income through June 2022. Many children from struggling families do not qualify for free school meals, and school meal fees create a barrier to participation. Offering school meals to all enrolled students eliminates the cost barrier for children whose families' income is near the cutoff line to receive free school meals or for families whose income fluctuates throughout the year. Healthy school meals for all reduces the paperwork burden for families and schools; eliminates the stigma of being singled out for receiving school meal assistance; and helps programs return to fiscal solvency. Providing healthy school meals for all is universally supported by school food service directors, school-based groups, public health, and the nutrition and anti-hunger community and is overwhelmingly supported by school officials and parents. The economic downfall will likely mean an influx of children newly eligible for free school meals once the COVID waivers are no longer available.

- *Support an EBT program for children to provide nutrition benefits to families when schools are closed.*

Built off the success of the Summer EBT demonstration pilots, the Pandemic EBT (P-EBT) program has provided families with resources to purchase food to replace meals that children would have received through the child nutrition programs during normal times. The provisions in the American Rescue Plan Act that extended the P-EBT program through the length of the public health emergency and the administration's increase in benefits to cover an additional snack are critical to ensure children can eat for the duration of the public health crisis. We also support making Summer EBT permanent, as proposed in the American Families Plan and the *Universal School Meals Program Act* (S. 1530/H.R. 3115). Going forward, EBT benefits should be provided to families who receive free or reduced-price school meals whenever schools are closed during summer vacation, on weekends, for school holidays, and for unexpected closures. In addition, there should be an additional fruit and vegetable benefit, as proposed in the *Fruits and Vegetables for Children During Pandemic Act of 2021*.

- *Increase the number of children who have access to nutritious meals through the summer nutrition programs.* The summer nutrition programs, combined with recreational and enrichment programming, get children out of the house and moving during the long summer break when children are more likely to gain excess weight. When appropriate, allow for rural areas to provide non-congregate service. Streamline paperwork between summer and afterschool meal programs. Strengthen nutrition standards to align with school meals and the Child and Adult Care Food Program (CACFP). Incorporate bills that address efficiency of summer meals, including the Stop Child Summer Hunger Act; the Summer Meals Act (S. 1170/H.R. 783); and Child Summer Hunger Act. Congress should also address the discrepancy in reimbursement between SSO and SFSP.

- *Strengthen and expand CACFP.*

Allow the option of an additional meal service; allow annual eligibility for proprietary centers; improve the area eligibility test; increase CACFP reimbursements to support the healthier nutrition standards; streamline program requirements; reduce paperwork; maximize technology to improve program access; prohibit serving any sugary beverages at CACFP sites; provide more technical assistance; continue funding for USDA's CACFP nutrition education; and make permanent allowing homeless young adults up to the age of 24 eligible for CACFP. Many of these provisions are in the *Access to Healthy Foods for Young Children Act of 2021* (S. 1270).

- *Strengthen access to the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC).*

Expand eligibility for postpartum women for two years and extending child eligibility until age six consistent with the bipartisan *Wise Investment in our Children Act (WIC Act)* (S. 853/H.R. 2011). Streamline participant access by relaxing physical presence requirements to permit remote certifications and telehealth appointments; extending certification periods to two years; enhancing adjunctive eligibility and referral networks; and investing in WIC technology projects and WIC's Breastfeeding Peer Counselor Program. Modernize program services by relaxing regulatory barriers, instituting a deadline for scaling up online shopping options for WIC families, and enhancing the WIC Farmers Market Nutrition Program. Update the food package consistent with the *Dietary Guidelines for Americans* and National Academy of Medicine recommendations.

**Recommendation: The USDA and Congress must support and strengthen other programs and policies that help schools be successful in providing nutritious school foods.**

- *Maintain the integrity of the Fresh Fruit and Vegetable Program (FFVP) and expand to more students.*  
Allow only fresh fruits and vegetables to be offered to ensure access and exposure. Expand the program to reach more children with the goal of making it available to all elementary students. At minimum, all schools qualifying for the Community Eligibility Provisions (CEP) should be guaranteed participation in the program.
- *Invest in school infrastructure improvements.*  
Include the bipartisan *The School Food Modernization Act* (S. 876), which would permanently authorize school kitchen equipment grants and loans for no less than \$35 million, as well as codifying a reduction in the grant threshold amount from \$5,000 to \$1,000. The American Jobs Plan recommends funds for kitchen equipment.
- *Support farm to school activities.*  
Include the bipartisan *The Farm to School Act* (S. 1328, H.R. 1768), which would increase funding for farm-to-school by \$15 million; increase the maximum allotted grant amount to \$250,000; and expand access for early care, summer, after school, and tribal programs, and the bipartisan *Kids Eat Local Act* (S. 1401, H.R. 2896) which makes it easier for schools to purchase locally.
- *Increase funding for USDA Foods.*  
Provide increased funding for commodities, particularly for breakfast, building on and increasing the \$20 million provided through FY2019 agriculture appropriations. This would help ease the fiscal burden for programs and provide more healthy options for schools.
- *Provide guidance to help schools accommodate adequate time to eat for students.*  
Use reauthorization as an opportunity to message around and show support for adequate time to eat, length of meal, and recess before lunch so that children meet recommendations to have at least 20 minutes in the seat to eat. Support legislation that would require a study from USDA on these issues and, in conjunction with the Department of Education, guide schools on best practices.
- *Ensure access to safe drinking water.*  
Improve drinking water accessibility by ensuring that all schools have at least one water bottle filling station in a high-traffic area accessible throughout the day, with filtration if needed, and, when feasible, ensure availability of cups or reusable bottles for filling.  
Congress and the Environmental Protection Agency (EPA) have recently taken steps to improve school and childcare drinking water safety. The Infrastructure Investment and Jobs Act of 2021 expands the existing Voluntary School and Child Care Program Lead Testing Grant Program by adding compliance monitoring and remediation of lead contamination in drinking water, with \$200M authorized over 5 years. The EPA Lead and Copper Rule Revision (LCRR), enacted in December 2021, requires regular testing in elementary schools and childcare sites constructed before 2014.
- *Eliminate lunch shaming.*  
Lunch shaming can be most easily addressed by making healthy school meals for all permanent. The *Universal School Meals Program Act* (S. 1530/H.R. 3115) prohibits schools from stigmatizing children who are unable to pay for school meals or who have outstanding debt.
- *Clarify that school food service workers are to be paid during professional training.*

Include the *Improving Training for School Food Service Workers Act* (H.R. 2897). Training is critical to ensure that workers are able to meet the healthy standards successfully.

- *Support Tribes.*  
Allow Tribes the authority to directly provide child nutrition programs. Tribes understand the needs of their communities best, especially when it comes to ensuring children have consistent, healthy, and nutritious meals through schools, child care and community-based programs all year long.

**Recommendation: The USDA and Congress must support and strengthen strong, comprehensive, culturally appropriate, and well-coordinated nutrition education programs.**

- Increase state grants by five percent for the SNAP Obesity Prevention and Nutrition Education Grant Program (SNAP-Ed). SNAP-Ed is an evidence-based program that helps SNAP participants lead healthier lives. In addition to the SNAP benefit boost that provides critical assistance to participants and supports local economies, an increase in SNAP-Ed funding is needed to enhance nutrition education efforts, social marketing campaigns, and improve policies, systems, and the environment of the community both during and after the pandemic.
- Include the *Food and Nutrition Education in Schools Act* (S. 1421) which provides funding for the USDA to establish a pilot grant program to create food and nutrition education positions in a range of rural, urban, and tribal schools. Food and nutrition educators will implement evidence-based practices proven to maximize students' consumption—and enjoyment—of healthy meals. Priority will be given to schools in neighborhoods with high rates of childhood diet-related illnesses and schools in which 40 percent or more of students qualify for free or reduced-price meals.
- Define nutrition education as any combination of individual and group-based nutrition education, health promotion, and intervention strategies that are comprehensive; multilevel interventions at multiple complementary organizational and institutional levels; and community and public health approaches to improve nutrition.
- Allow nutrition education programs to include physical activity promotion strategies in alignment with the most recent Dietary Guidelines recommendations.
- Establish and financially support a formal coordination mechanism that promotes effective collaboration among nutrition professionals across the federal, regional and state agencies.
- Continue to support research that provides evidence-based improvements for comprehensive, culturally appropriate, and nationwide nutrition education and promotion approaches that foster healthy behaviors, educational attainment, and lifelong health for all children.

Sincerely,

1,000 Days  
Academy of Nutrition and Dietetics  
American Academy of Pediatrics  
American Cancer Society Cancer Action Network  
American Heart Association  
American Public Health Association  
Association of SNAP Nutrition Education Administrators (ASNNA)  
Association of State Public Health Nutritionists  
B.Komplete  
Balanced  
Beyond Hunger  
Center for Science in the Public Interest  
Chef Ann Foundation  
Children's Council of San Francisco  
Community Food Advocates  
Consumer Federation of America  
Earthjustice  
Farm Sanctuary  
First Focus Campaign for Children  
Food Research & Action Center (FRAC)  
FoodCorps  
Greater Richmond Fit4Kids  
Healthy School Food Maryland  
Healthy Schools Campaign  
Illinois Public Health Institute  
Johns Hopkins Center for a Livable Future  
Jump IN for Healthy Kids  
Kentucky Equal Justice Center  
Laurie M. Tisch Center for Food, Education & Policy  
LunchAssist  
MAZON: A Jewish Response to Hunger  
National Association of County and City Health Officials  
National Association of Pediatric Nurse Practitioners  
National Athletic Trainers' Association  
National Disability Rights Network (NDRN)  
National Education Association  
National League for Nursing  
National Wellness Policy Study at the University of Illinois Chicago  
National WIC Association  
Nemours Children's Health  
North Carolina Alliance for Health  
Save the Children  
Save the Children Action Network (SCAN)  
Society for Nutrition Education and Behavior  
Society of Behavioral Medicine  
The Food Trust  
TomKat Ranch

United Fresh Produce Association  
Urban School Food Alliance

*Endorsement of these principles does not imply that signatories have taken a position on every bill referenced. Bill numbers are listed as available.*

**About the National Alliance for Nutrition and Activity (NANA)**

The National Alliance for Nutrition and Activity (NANA) advocates for national policies and programs to promote healthy eating and physical activity to help reduce the illnesses, diseases, disabilities, premature deaths, and costs associated with diet and inactivity. Our efforts include advocating for strong public policy and program funding, supporting effective education programs, and promoting environmental approaches to help the public eat better and be more active. [www.NANACoalition.org](http://www.NANACoalition.org)

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