

March 23, 2020

Tina Namian
School Programs Branch
Policy and Program Development Division
Food and Nutrition Service
U.S. Department of Agriculture
1320 Braddock Place
Alexandria, VA 22314

RE: Comment Request-Determining Eligibility for Free and Reduced Price Meals and Free Milk

Dear Ms. Namian:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit comments to the Food and Nutrition Service of the U.S. Department of Agriculture related to its comment request for “Determining Eligibility for Free and Reduced Price Meals and Free Milk”, originally published in the Federal Register on January 21, 2020 (85 FR 3335). Representing over 107,000 registered dietitian nutritionists (RDNs),¹ nutrition and dietetic technicians, registered (NDTRs), and advanced-degree nutritionists, the Academy is the largest association of food and nutrition professionals in the United States. We are committed to accelerating improvements in the nation’s health and well-being through food and nutrition.

The Academy supports efforts that provide equal and equitable access to school meals for all children and reduce the administrative burden to operate school meal programs by expanding and strengthening provisions that bolster universal school meals and the Community Eligibility Provision (CEP).²

A. Investment in School Meals is an Investment in Our Nation’s Future

In a position paper published in coordination with the School Nutrition Association and Society for Nutrition Education and Behavior, the Academy states, “comprehensive, integrated nutrition programs in preschool through high school are essential to improve the health, nutritional status and academic performance of our nation’s children.”³

¹The Academy approved the optional use of the credential “registered dietitian nutritionist (RDN)” by “registered dietitians (RDs)” to more accurately convey who they are and what they do as the nation’s food and nutrition experts. The RD and RDN credentials have identical meanings and legal trademark definitions.

² The Academy of Nutrition and Dietetics. Academy Priorities for the 2019 Child Nutrition Reauthorization.

<https://www.eatrightpro.org/-/media/eatrightpro-files/advocacy/legislation/academycnrrecommendations2019.pdf?la=en&hash=2ED58585C7C2565D281EC45C272759F11B8E230F>. Accessed on March 20, 2020.

³ Position of the Academy of Nutrition and Dietetics, Society for Nutrition Education and Behavior, and School Nutrition Association: Comprehensive Nutrition Programs and Services in Schools. Journal Academy of Nutrition and Dietetics. 2018;118(5):913-919.

School meals are healthier now than ever. The changes to the school meal nutrition standards introduced in the Healthy, Hunger-Free Kids Act significantly increased the dietary quality of both the lunch and breakfast program offerings.⁴ The Healthy Eating Index scores for lunch and breakfast increased by 41 percent and 44 percent, respectively. This can be attributed to the increase in whole-grains, fruits and vegetables and a decrease in sodium, refined carbohydrates and excess calories.⁵

Dietary quality of school meals is better than the overall dietary quality of the average student.⁶ Evidence shows that the health of students is linked to their academic achievement⁷ and that offering universal school meals increases participation in school meal programs.⁸ By increasing access to and participation in these programs, we can help ensure that young people are ready to learn. Healthy school meals are as important to student learning as textbooks and pencils. The Academy believes an investment in universal school meals is an investment in our nation's future.

B. School Meal Programs Can Be Burdensome to Administer

The Academy represents approximately 1,000 members who comprise our School Nutrition Services (SNS) Dietetics Practice Group (DPG), many of whom are on the frontlines serving children school meals every day. These members have discussed the challenges of operating school meal programs. In a hearing before the House Committee on Education and Labor Subcommittee on Civil Rights and Human Services, Academy Past President and School Nutrition Director Donna Martin, stated, "School nutrition programs are essentially like running a restaurant, a PR agency and a nutrition education campaign, all while operating under a tight budget with minimal time and resources."⁹

Through informal communication, members of the SNS DPG report that CEP, a provision that allows for universal school meal service, has strengthened their school nutrition programs. These benefits come from reducing the burden of administrative duties such as application collection and allow more time to be spent on nutrition education, healthy menu planning and customer service. "We operate under the Community Eligibility Provision, which has made running my program more efficient by eliminating unnecessary administrative time, paperwork and cost."¹⁰

Despite the benefits of CEP, not all schools are eligible for this model and there are still many entities, who are eligible, that have not implemented. Only 65% of eligible National School Lunch Program (NSLP) schools have chosen to participate.¹¹ The Academy urges

⁴ USDA. School Nutrition and Meal Cost Study. https://fnsprod.azureedge.net/sites/default/files/resource-files/SNMCS_Summary-Findings.pdf. Accessed on March 20, 2020.

⁵ Ibid

⁶ Ibid

⁷ CDC. https://www.cdc.gov/healthyschools/health_and_academics/pdf/health-academic-achievement.pdf. Accessed March 20, 2020.

⁸ Crepinsek, M. K., Singh, A., Bernstein, L. S., & McLaughlin, J. E. (2006). Dietary Effects of Universal-Free School Breakfast: Finding from the Evaluation of the School Breakfast Program Pilot Project. *Journal American Dietetic Association*, 106(11), 1796-1803.

⁹ Donna Martin. Statement for the Record Before the House Committee on Education and Labor Subcommittee on Civil Rights and Human Services. March 12, 2019. <https://edlabor.house.gov/imo/media/doc/Donna%20Martin%20written%20testimony.pdf>. Accessed on March 21, 2020.

¹⁰ Ibid

¹¹ Food Research and Action Center. Community Eligibility: The Key to Hunger-Free Schools School Year 2018-2019.

<https://frac.org/wp-content/uploads/community-eligibility-key-to-hunger-free-schools-sy-2018-2019.pdf>. Accessed on March 21, 2020.

USDA to make a concerted effort to promote state and local strategies, like peer education and improvement of direct certification systems, to maximize the up-take of the CEP option and increase meal participation while decreasing paperwork burden associated with NSLP.

C. Maximizing the Benefits from Universal School Meal Programs in the Time of Lunch Shaming and Growing Unpaid Meal Debt

The Academy urges USDA to consider the additional benefits to promoting and supporting efforts to strengthen universal school meal provisions beyond the reduction of administrative burden. Unpaid meal debt and associated lunch shaming are growing problems in the United States. Universal school meal programs are a solution to both issues.

A 2018 School Nutrition Operations Report found more than 75% of school districts surveyed reported having unpaid student meal debt at the end of school year 2016-2017, with a median of \$3,400.¹² This debt exists despite proactive efforts to prevent meal charges and collect on unpaid meal debt such as implementing online payment/account balance monitoring systems, employing parent and guardian electronic notifications efforts, application technical assistance and accepting community donations. By providing meals to all students at no cost, meal debt does not accrue. This helps protect limited educational resources that districts often use to pay off unpaid meal debt.

Lastly, emerging research conducted by the School Nutrition Association suggests that benefits from universal school meal programs may eventually outweigh the costs.¹³ Universal school meal programs have been associated with increased test scores and graduation rates and decreased absences.^{14,15} More research needs to be done to see how these intermediate outcomes translate to long-term impact but one could conceptualize, for example, that if universal school meals increases high school graduation rates that it could impact college admissions and ultimately lead to higher earnings as an adult. The Academy urges USDA to support efforts to better understand long-term impact of universal school meal programs by studying students who have participated in CEP.

D. Conclusion

The Academy appreciates the opportunity to submit comments related to the burden of collecting eligibility criteria for NSLP, SBP and the Free Milk Program. We urge USDA to support efforts and help provide the technical assistance and infrastructure to school nutrition professionals so that they can maximize participation in provisions that allow for universal school meal service. This will allow for greater reach in student meal participation and permit staff to spend more time on critical program operations rather than burdensome administrative tasks. Please contact either Jeanne Blankenship at 312-899-1730 or by email at jblankenship@eatright.org or Liz Campbell at 202-775-8277 ext.

¹²The School Nutrition Association. School Nutrition Operations Report: The State of School Nutrition 2018. <https://my.schoolnutrition.org/productcatalog/product.aspx?ID=12140>. Accessed on March 20, 2020.

¹³Food Management. <https://www.food-management.com/k-12-schools/school-nutrition-association-research-shows-benefits-serving-universal-free-school>. Accessed March 21, 2020.

¹⁴ Ibid

¹⁵ Food Research and Action Center. Breakfast for Learning. <https://frac.org/wp-content/uploads/breakfastforlearning-1.pdf>

6021 or by email at ecampbell@eatright.org with any questions or requests for additional information.

Sincerely,



Jeanne Blankenship, MS, RDN
Vice President
Policy Initiatives and Advocacy
Academy of Nutrition and Dietetics



Liz Campbell, MA, RDN
Senior Director
Legislative & Government Affairs
Academy of Nutrition and Dietetics