

February 17, 2021

We, the undersigned organizations, write to urge Congress and the Biden-Harris administration to support child nutrition programs that ensure vulnerable families receive nutritious meals for their children during and after the COVID-19 pandemic. Specifically, we ask the following priorities be included in the stimulus or other legislative packages and through administrative action where possible:

**Provide healthy school meals for all.** School meals reduce childhood hunger, decrease childhood overweight and obesity, improve child nutrition and wellness, enhance child development and school readiness, and support learning, attendance, and behavior. Many struggling families do not qualify for free school meals, and school meal fees create a barrier to participation. Offering free meals to all students eliminates the cost barrier for children whose families' income is near the cutoff line to receive free school meals. And having meals available to every student for free eliminates the stigma of being singled out for receiving school meal assistance. We urge you to extend the nationwide waivers currently set to expire June 30, 2021 for as long as health and economic factors indicate the need. Within the waivers, schools should be encouraged to provide free meals through the National School Lunch Program's Seamless Summer Option, which has stronger nutrition standards, than through the Summer Food Service Program.

**Restore science-based nutrition standards.** Given that the pandemic has worsened the childhood obesity crisis, school meal nutrition standards need to be strong and evidence-based now more than ever. Schools are currently required to meet the original nutrition standards rule from 2012 (77 FR 4088, January 26, 2012), however the rule is now outdated. The U.S. Department of Agriculture (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 and the National Academies of Sciences, Engineering, and Medicine's sodium recommendations; restore the 100 percent whole-grain-rich requirement; and restore the limit on flavored 1 percent (low-fat) milk or implement a calorie limit consistent with expert recommendations. USDA must also establish an added sugars standard for school meals and replace the total sugar standard with an added sugars standard for competitive foods consistent with the Dietary Guidelines for Americans.

**Commit to serving nutritious meals during the COVID-19 pandemic.** In the Families First Coronavirus Response Act, Congress provided USDA the authority to waive nutrition standards as appropriate to accommodate supply chain disruptions related to COVID-19. However, USDA released a memo in August 2020 that notified schools that they no longer document food system disruptions, which is inconsistent with federal law. We 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. In addition, knowing what challenges schools are facing allows USDA to help provide technical assistance where appropriate and help schools transition back to meet the meal patterns when schools go back to in-person learning. USDA must restore the requirement that schools document hardship for use of these waivers.

**Enhance the value and nutritional quality of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) food packages.** WIC is an effective program that enhances children's diet quality, improves pregnancy and birth outcomes, and closes racial disparities for maternal health, breastfeeding, and child nutrition. The proposed \$3 billion in WIC improvements is crucial to connecting millions of eligible individuals with WIC's effective public health nutrition services.

Dedicated multiyear funding to improve the real and perceived value of the WIC benefit and strengthen USDA outreach, infrastructure, and coordination with other programs is essential to reversing caseload decline, especially among young children. This funding should complement efforts to review the food package consistent with nutrition science and enhance the value of WIC benefits to increase access to nutritious foods. In the short-term, Congress should increase the value of the Cash Value Benefit to address the immediate nutrition needs of WIC participants during the pandemic. By the end of fiscal year 2021, USDA should review the 2017 National Academies report (which was cost-neutral), the latest iteration of the Dietary Guidelines for Americans, and additional stakeholder input (e.g., conduct participant listening sessions, tribal consultations, reconvene the National Advisory Council on Maternal, Infant, and Fetal Nutrition, commission a Food and Nutrition Board of the National Academies of Science, Engineering, and Medicine roundtable, etc.) to inform a formal rulemaking process to expand the value, increase the variety, and strengthen the nutritional quality of WIC-approved foods.

**Support Pandemic EBT (P-EBT).** The 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. There has been significant delay in benefits for this school year. We fully support the recent Executive Order that requests USDA guidance to increase P-EBT benefits to include an additional snack. Further, we ask USDA to work with states to ensure that they fully use the simplified benefits that are available through the 2021 Consolidated Appropriations Act and ensure that all states submit a Pandemic EBT plan for the 2020-2021 school year, including providing benefits to young children. The program is set to expire on September 30, 2021, and benefits cannot be provided during summer vacation, on weekends, or school holidays. The Administration should work with Congress to extend and strengthen an EBT program for children that helps to ensure they have the nutrition they need when schools are closed.

**Provide funding relief for school nutrition and Child and Adult Care Food Program 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 or incurred more expenses than normal (e.g. labor, transportation) while seeing a significant decrease in revenues from reduced meal participation. We appreciate that the last COVID relief package provided funding for school foodservice authorities and childcare institutions to help cover COVID-related emergency operational costs from March-June 2020 to make up for budget shortfalls due to low child nutrition program participation. However, more is needed to sustain these essential feeding programs by extending the relief funding through at least June 2021.

**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 participants lead healthier lives through nutrition education, social marketing campaigns, and improve policies, systems, and the environment of the community.

**Invest in and prioritize the delivery, coordination, and evaluation of nutrition education.** Given the disproportionate impact the COVID-19 pandemic has had on communities of color and the complications experienced by those with diet related chronic disease, it is more important than ever to invest in nutrition education as a strategy to improve diet quality and support the Biden-Harris focus on racial equity. Specifically, as recommended by the Government Accountability Office (GAO), we call on USDA to develop a formal mechanism, such as a designated individual or group of individuals, for providing cross-department leadership for USDA's nutrition education efforts and facilitating cross-

program information sharing. This individual or group would be dedicated to the coordination of nutrition education through USDA programs (e.g., Team Nutrition, WIC, SNAP-ed, etc.) and conduct listening sessions across the USDA regions to gain information from the participants in and implementers of multiple USDA and the Department of Health and Human Services nutrition assistance programs on best ways to adopt the new Dietary Guidelines for Americans recommendations.

Sincerely,

1,000 Days

Academy of Nutrition and Dietetics

Action for Healthy Kids (AFHK)

Advocates for Better Children's Diets

Alliance for a Healthier Generation

American Academy of Pediatrics

American Heart Association

American Public Health Association

American Society for Nutrition

ASAP (Appalachian Sustainable Agriculture Project)

Association of SNAP Nutrition Education Administrators (ASNNA)

Association of State Public Health Nutritionists

Balanced

Boulder County Public Health

Center for Science in the Public Interest

ChangeLab Solutions

Chef Ann Foundation

Children's Healthy Weight Research Group

Colorado Children's Campaign

Community Food Advocates NYC

Consumer Federation of America

Duke World Food Policy Center

Earthjustice

Educational Sustainability Mobilization Inc.

First Focus Campaign for Children

Food Research & Action Center (FRAC)

FoodCorps

Friends of the Earth U.S.

Indy Hunger Network

Johns Hopkins Center for a Livable Future

Jump IN for Healthy Kids

Laurie M. Tisch Center for Food, Education & Policy

LunchAssist

March of Dimes Inc

MAZON: A Jewish Response to Hunger

Minority Womens Health Alliance

Montgomery County Food Council

National Action Against Obesity

National Association of Councils on Developmental Disabilities

National Association of Pediatric Nurse Practitioners  
National Athletic Trainers' Association  
National Disability Rights Network (NDRN)  
National Education Association  
National WIC Association  
North Carolina Alliance for Health  
North Carolina Partnership for Children, Inc.  
Nourish Colorado  
Physicians Committee for Responsible Medicine  
Real Food for Kids  
Society for Nutrition Education and Behavior  
Society of State Leaders of Health and Physical Education  
The Community Foundation of Western North Carolina  
The Food Trust  
Trust for America's Health  
Union of Concerned Scientists  
Urban School Food Alliance  
WNC Bridge Foundation