



On behalf of school nutrition professionals working on the frontlines to nourish Texas' children during the pandemic, the Texas Association for School Nutrition (TASN) greatly appreciates USDA's swift response to extend several waivers that will be critical for school meals for the 2020/2021 school year.

In addition to the newly extended waivers, TASN urges USDA to allow school meal programs to continue serving students through the Summer Food Service Program (SFSP) or Seamless Summer Option (SSO) following COVID-19 to the end of the next school year and recognize the continued unexpected school closures and partial closures.

TASN urges USDA & TDA to offer/extend the following waivers:

- 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.
- Waive vegetable subgroup requirements
- Afterschool activity waiver for after school meals
- Waiver for state agencies to postpone compliance reviews of Child Nutrition programs during this coming school year, which will allow state agencies to provide increased need for technical assistance during this time.
- Waive requirement for potable water during this time of heightened cross-contamination concerns.
- Waiver requirements for professional standards to allow Child Nutrition programs and educational entities to convert all trainings to a virtual platform.

K-12 education will look very different in the 2020/2021 school year. Some students will learn in person, while others will continue to learn virtually. This drives the need for school meal programs to have multiple options approved and in place in a very short amount of time. In addition to extending SSO/SFSP area-eligibility meal service, TASN urges USDA to 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. In addition, providing universally free meals to all students will eliminate the risk of overtly identifying students qualified for free or reduced-price meals and eliminates "lunch shaming" for alternate meals provided to students with negative account balances.

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 survey from the School Nutrition Association, 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.



School meal programs also depend heavily on USDA Foods to reduce meal costs and offer students a wide range of U.S. grown foods. TASN appreciates the USDA approval to all SFAs to utilize lunch participation data from SY 2018/2019 when calculating state entitlement values for the 2020/2021 school year. Anticipating another year of decreased participation due to COVID-19 related issues, TASN urges USDA to further secure the future of USDA Foods entitlement by using 2018/2019 lunch participation when calculating SY 2021/2022 entitlement.

TASN proudly advocates for school meal programs and the students they serve. Today, unprecedented challenges 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 and TDA must continue to act to preserve these programs, which play a critical role in the public health response to the pandemic and combatting chronic child hunger.

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