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23 March 2022

Tina Namian, Chief
School Programs Branch
Policy and Program Development Division – 4th Floor
Food and Nutrition Service
1320 Braddock Place
Alexandria, VA 22314

RE: Child Nutrition Programs: Transitional Standards for Milk, Whole Grains and Sodium

Dear Ms. Namian:

We write to you on behalf of the Alaska School Nutrition Association (AKSNA), which represents school nutrition professionals across the great state of Alaska. We appreciate that the USDA has recognized the challenges that confront school nutrition professionals each day and urge you to further acknowledge the impact of these challenges by delaying and reconsidering the method in which transitional standards for milk, whole grain, and sodium are implemented in child nutrition programs. We desire to continue operating under current nutritional standards with the option of meeting higher target standards for a cash performance incentive at a time and manner determined by each individual SFA.

Alaska's school nutrition professionals serve 48,000 school lunches and 25,000 school breakfasts per day across 365 million acres in a state where most school districts do not have roads. Like the USDA, our goal is to ensure that our children receive nutritious, enjoyable school meals. Supply chain challenges notwithstanding, we face many hurdles acquiring nutritious foods and ingredients and promoting their consumption. The selection of manufacturers and distributors in Alaska, and in particular, "roadless" areas is limited and increasingly narrow due to supply chain disruptions.

Alaska's SFA serve a small portion of the 30 million school lunches each day, a small portion of a US food market that serves 330 million Americans and a global market of 7.5 billion. Manufacturers have increasingly prioritized larger segments of the market rather than, what is to them, a niche segment of the market. Distributors likewise reduce risk by prioritizing broadline customers and stock more general merchandise that does not meet current, nor transitional, child nutrition standards. Our access to distributors in Alaska is further hampered by the remote nature, both in distance and transportation modes, to most of the state. We are frequently faced with challenges acquiring nutritious foods, supply chain disruptions notwithstanding.

Increasing nutrition standards further challenges participation in child nutrition programs. School meals are often the best source of nutrition for school-age children; discouraging participation discourages nutrition. The passage of the HRFKA saw participation in school nutrition programs dip as students initially rejected and slowly acclimated to the increased nutritional standards. We anticipate that, if we are able to procure

the products and ingredients, that this will happen again at a time when many families in Alaska and across the US struggle with extraordinary consumer price increases.

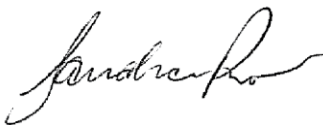
We join with the School Nutrition Association, which represents 58,000 school nutrition professionals throughout the US and its territories, in requesting that these standards remain unchanged. SNA has identified several reasons that the existing standards are beneficial to child nutrition:

- School meal programs already meet significant nutritional standards including sodium reduction, increased fruit and vegetable servings, increased whole grain, and leaner proteins.
- School meals are the healthiest meals most children eat.
- Labor shortages and long-term impacts to the supply chain already impacting 92% of SFAs
- Food manufacturer and distributor efforts to streamline, reducing availability of foods that meet the highly specialized child nutrition standards.
- Only 11% of SFA directors are able to meet the sodium target with 97% expressing concerns of negative impacts on child nutrition programs.
- Three quarters of SFAs face staffing shortages according to the USDA, particularly among cook/prep staff.
- Congressional inaction on child nutrition waivers.

Like the USDA, AKSNA members desire for improvements in child nutrition; we ask that an alternative path forward be created that allows school nutrition professionals the ability to continue to serve nutritious meals while affording the opportunity to meet targeted increases. We request that increased nutritional standards be offered as a voluntary per-meal cash-based performance incentive, which would allow SFAs to incrementally work toward these higher standards at a point when students' tastes and preferences evolve, manufacturers begin to adapt, and the supply chain in the US and our localities improves.

On behalf of our members, we thank you for reviewing and considering our request and appreciate your support as we continue to provide for students' nutritional needs.

Sincerely,



Sandie Ponte
President



Rachel Spencer
Public Policy & Legislation Chair