

July 12, 2021

Director
Strategic Collection, Clearance Governance and Strategy Division
U.S. Department of Education
400 Maryland Avenue
Washington, DC 20202-8240

RE: School Pulse Panel Preliminary Activities

Dear Director:

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 Education related to its information collection activities, “The School Pulse Panel Preliminary Activities,” published in the Federal Register originally on June 11, 2021. Representing more than 112,000 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 and is committed to improving the nation’s health through food and nutrition.

The Academy applauds the efforts of the U.S. Department of Education to collect information on issues concerning the impact of the COVID-19 pandemic on students and staff in U.S. public primary, middle, high and combined-grade schools. Specifically, the Academy urges the collection of how school nutrition programs were frontline responders during the pandemic and establish best practices for future emergency scenarios, how the pandemic has impacted the financial security of school nutrition programs and how school nutrition programs can be elevated as key strategies to address health disparities that were highlighted by the COVID-19 health emergency.

Academy Position on School Meals

It is the position of the Academy of Nutrition and Dietetics, School Nutrition Association, and Society for Nutrition Education and Behavior that 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.² The Academy urges the

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 Hayes D, Contento IR. 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. *Nutr Educ Behav.* 2018 May;50(5):433-439.

Department of Education to collect information that will help with the stabilization and future leveraging of the school nutrition programs to establish healthy eating habits and contribute to strategies to address Social Determinants of Health such as access to healthy food environments and educational outcomes.

A. School Nutrition Program as First Responders in COVID-19 Pandemic

As the nation grappled with the impact of COVID-19 disruptions, school nutrition professionals worked on the frontlines to combat rising levels of food insecurity in their communities. School meal programs chose to keep workers employed, deliver meals to students with no additional reimbursement and expose staff to the coronavirus with little to no funding for proper personal protective equipment. **The Academy urges the Department of Education to collect best practices in emergency response in order to inform policies for response in future emergencies.**

During the pandemic, many school nutrition programs maintained fixed expenses such as salaries while taking on unanticipated expenses including hazard pay and transportation, all while participation rates were significantly reduced. School nutrition programs rely on reimbursement from meal service to pay for expenses. This unanticipated loss of revenue has forced programs to tap into fund balances and draw upon lines of credit to sustain their operations. Congress has provided modest emergency relief funds for these programs but Academy members have reported that these financial losses are likely to impact school nutrition programs for the next year or two. Given school meal programs' critical impact on learning and food security, it is imperative to understand what program support is needed while protecting jobs and limited education resources. The Academy urges the Department of Education to collect information to give a complete financial overview of how the pandemic has impacted school nutrition programs and what it will take to stabilize this crucial program.

B. Healthy School Meals for All

Providing healthy school meals for all school age children, regardless of their ability to pay, is a potential strategy to alleviate the disproportionate childhood food insecurity levels experienced by minority children. This disparity existed prior to the pandemic but has been exacerbated by the impact of COVID-19; in 2019, USDA reported that 23% of Black households with children and 17% of Latinx households with children were food insecure, in comparison to only 10% of white households with children.³ During the pandemic, this disparity only increased, as the Urban Institute reported that food insecurity among Black households with children increased to 40%, and among Latinx households with children up to 39%.⁴ School meals have proven crucial in alleviating childhood food insecurity amid the pandemic, in no small part because of waivers allowing schools to serve meals free of charge to all students regardless of their income level.

³ *Household Food Security in the United States in 2019*. USDA Economic Research Service. September 2019. Available at: <https://www.ers.usda.gov/webdocs/publications/99282/err-275.pdf?v=4232.8>

⁴ *Forty Percent of Black and Hispanic Parents of School-Age Children Are Food Insecure*. Urban Institute. December 2020. Available at: <https://www.urban.org/research/publication/forty-percent-black-and-hispanic-parents-school-age-children-are-food-insecure>

In addition to being a key support in alleviating childhood food insecurity among minority students, school meals can also help reduce racial disparities in health and education. 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.⁵ Maintaining access to healthy school meals for all students will ensure that every child has access to the wide ranging educational and health benefits of school meals, regardless of their racial or ethnic background.

Because of how vital school meals have been during the pandemic in alleviating childhood food insecurity for Black students, we cannot go back to a school meal format that left out so many students through the tiered payment system, school lunch debt and stigma. Many struggling families do not qualify for free school meals under the current tiered system and school meal fees create a barrier to participation, not to mention stigma for children with lunch debt who experience lunch shaming practices. Offering free meals to all students eliminates the cost barrier for families who do not qualify, but who still struggle to make ends meet. Further, by having every student participate in school meals, it helps address the stigma some children fear of being labeled “poor” by their classmates, a phenomenon felt hardest by middle and high school students.

As we continue to work to heal our nation in the aftermath of the twin pandemics of COVID-19 and systemic racism, now is the time to maintain healthy school meals for all as a key educational support to ensure that students have access to the key nutrition they need to thrive inside and outside the classroom. **The Academy urges the Department of Education to collect information on the impact of free school meals for all has had on students during the pandemic and what resources would be needed to continue this practice beyond this health emergency.**

C. Conclusion

The Academy of Nutrition and Dietetics appreciates the opportunity to submit comments to the U.S. Department of Education in response to its request for information, “The School Pulse Panel Preliminary Activities” and we urge the department to examine how best to support access to healthy school meals as students return back to school full time. Please contact either Jeanne Blankenship at 312-899-1730 or jblankenship@eatright.org, or Liz Campbell at 202-775-8277 ext. 6021 or ecampbell@eatright.org, with any questions or requests for additional information.

⁵ FRAC reference

Sincerely,

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