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January 19, 2016

The Honorable Pat Roberts
Chair
Committee on Agriculture, Nutrition &
Forestry
United States Senate
Washington, DC 20510

The Honorable Debbie Stabenow
Ranking Member
Committee on Agriculture, Nutrition &
Forestry
United States Senate
Washington, DC 20510

Our Mission
Working with and
through our State
Associations, NSBA
Advocates for Equity
and Excellence in
Public Education
through School Board
Leadership

Re: *The "Improving Child Nutrition, Integrity and Access Act of 2016"*

Office of Advocacy

Dear Chairman Roberts and Ranking Member Stabenow:

John D. Tuttle
President

The National School Boards Association (NSBA), representing more than 90,000 local school board members across the nation, working with and through our state associations, applauds the bipartisan effort to reauthorize the expired Child Nutrition Act. School districts and schools are on the front lines serving lunch and/or breakfast to 30 million children. Many districts have struggled to meet new standards and other requirements since the *Healthy, Hunger-Free Kids Act* was enacted.

Thomas J. Gentzel
Executive Director

Michael C. Zola
Associate Executive Director

NSBA therefore offers qualified support for the "Child Nutrition, Integrity and Access Act of 2016 (ICNIA)" as an important and promising first step toward incorporating the local school district governance perspective in implementation of school meal programs, and ensuring a healthy and positive learning environment for children to achieve their full potential.

NSBA recognizes the progress in the ICNIA Act to build local school board governance and flexibility into administration of the programs, and to abandon a "one size fits all" approach in some instances. Examples include relief for whole grain and sodium reduction targets, a paid meal equity exemption to reduce unnecessary price increases for unsubsidized meals, a mechanism to address unintended consequences of the competitive foods standards, and restoration of the five year administrative review cycle.

Going forward, NSBA supports creation of a School Nutrition Advisory Committee established in Section 305 that includes membership from an association representing local school boards among a broad continuum of stakeholders. Meaningful and ongoing stakeholder involvement is critical in light of current and emerging requirements of the *Healthy, Hunger-Free Kids Act* and new requirements in the ICNIA.

For example, the pending rule for local school wellness policies and food marketing, and compliance with professional standards and their implementation are both likely to have broad impact on school districts outside the school food authority. Further, expanded requirements for eligibility verification in the CNIA Act will impose significant new operational and financial burdens on local school districts. Extending the Secretary's authority to the selection of verification procedures and software are decisions better left to local school districts.

Proactive inclusion of the school board perspective could prevent federal overreach into school district operations and safeguard their instructional mission.

School districts are critical partners in the effort to assure a healthy and positive learning environment for children to achieve their full potential. NSBA therefore offers qualified support for the “Child Nutrition, Integrity and Access Act” and looks forward to working with the Senate and House of Representatives to further ensure a bill that supports children’s and school district success.

Sincerely,

A handwritten signature in black ink that reads "Thomas J. Gentzel". The signature is written in a cursive style with a large, stylized initial "T".

Thomas J. Gentzel
Executive Director

cc: Members of the U.S. Senate Committee on Agriculture, Nutrition & Forestry