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*The Urban School Food Alliance was created by school foodservice professionals in 2012 to address the unique needs of the nation's largest school districts.*

August 30, 2021

The Honorable Tom Vilsack  
Secretary  
U.S. Department of Agriculture  
1400 Independence Avenue, SW  
Washington D. C. 20250

Dear Secretary Vilsack,

Thank you for your continued support of school meals programs and your quick responses to the hunger issues still pushing American families into dire situations.

As Executive Director of the Urban School Food Alliance, I represent 16 of the largest school districts in the country. These schools have 50,000 or more enrolled children and are located within the large urban areas across America. As the school districts try to reopen this fall, many have come to believe that the school meals programs will start to alleviate some of the hunger issues families face. While that is usually true, we have a number of growing challenges facing school meal programs as we begin to open our doors for the 2021-2022 school year. We had an all member zoom call on August 26 and gleaned a great deal of information as to what is happening in real time. Please allow me to take this opportunity to share some of the more dire challenges and our suggested solutions.

### Challenges:

1. Schools belonging to the Urban School Food Alliance are in need of 200 -300 employees in their departments. This severe shortage is from resignations due to mandated vaccines, retirements due to COVID fears, and other employment opportunities that can pay a much higher wage – good for the employees but very difficult for districts to manage with the federal reimbursement rate for school meals. This labor shortage is causing districts to discontinue federal programs such as breakfast and after school snacks/supper, go back to prepared and processed foods, and limit the type of choices for children.

2. Supply chain disruptions have elevated to the crisis point in districts across the country. They are seeing contracts cancelled, last minute closures of produce houses, incomplete deliveries, inconsistent products being delivered, and manufacturers pulling out of the school business altogether. This situation is not a total surprise. It is very difficult to do business in school nutrition. Almost impossible for the small producers and distributors, but even the large processors and distributors have decided it is not worth the layers and layers of rules, regulations, and 50 states making decisions. Another part of this challenge is that if you finally get some products, they meet the specifications in some federal programs but not in all – so staff must figure out where they can use the product and in which federal nutrition program.
  
3. State agencies are inconsistent with their interpretations of the rules, regulations, and now waivers. This has been an ongoing challenge for as long as I have been in the business, and it has increased drastically during COVID. National waivers are not really national waivers when left to state agency discretion. We have some states telling schools that since they are going back in session, they don't need waivers – but COVID is still here, and the challenges are huge! Schools have the extra burden of the responsibility to apply for those waivers, wait for a response, and then hope they get reimbursed for the meals they have been serving for the benefit of children while waiting.

### Suggested Solutions for the 2021 -2022 School Year

1. **Remove the need to apply for waivers**

Districts need to be able to just do the best they can with what they are able to bring into their districts. We need a blanket, national directive that all districts can use all waivers without applying and waiting for a response and then hoping their state will allow them to use the waivers available. We are in complete crisis mode and need wide open flexibilities until this all sorts itself out.

2. **Procurement flexibilities increased**

The price increases have been drastic, the substitutions non-stop, and the last-minute cancellations of contracts are sending districts scrambling. We need a temporary national waiver on bid requirements and expansion of micro purchasing thresholds as well as the number of times a micro purchase from a specific vendor can be used. Once again, please give districts the authority to just do business the best they can.

3. **Increased emergency funding**

While we appreciate the ability to use the Seamless Summer Option with the higher reimbursement rates, the increased costs for labor, food, and supplies are more than the reimbursement rate can cover. We are seeing anywhere from 8% – 29% increase in food costs and up to 200% in hazard pay for labor. These programs cannot sustain these increases, particularly with the decrease in participation that most of them have been experiencing during the pandemic.

4. **Simplify to one single meal pattern and one seamless program during the pandemic**  
When food items qualify differently for different federal nutrition programs it makes it next to impossible to try and make this work with the supply chain challenges we are experiencing. This needs to be addressed during normal times as well but during this crisis it is critical to helping us feed children. The second part of this is the total confusion of when you can or cannot feed children based on whether it is CACFP or SSO. If you use SSO you cannot send supper home with students without being part of CACFP. No SSO is allowed during an inter session, but CACFP is allowed – we are coming and going at an incredible pace. Please make it easier to just feed children without going back and forth between programs.
5. **Cease all Administrative Reviews for the 2021 – 2022 school year**  
Please ask FNS to cease all Administrative Reviews for this school year. These reviews are so burdensome to begin with, it takes multiple staff weeks and weeks to gather all the required information. The districts are worn out, exhausted, and they just do not have the manpower to do this. With all the disruptions in food supply and service models it is unreasonable to think that schools can comply with all the rules. Let's trust the professionals on the ground and let them serve children without all the bureaucracies of these administrative reviews. We had districts during the worst of COVID have 3 and 4 different administrative reviews on the different federal nutrition programs they operate. It was an unreasonable burden.

Thank you for allowing me to explain just a small piece of what school nutrition programs are enduring during this very difficult time. We believe strongly in accountability and serving high quality, nutritious food, but we need a new plan to get through this crisis. It is impossible to continue the way we are doing it now. We welcome the opportunity to share real time situations with you and your team and discuss these recommendations with you. **We have a virtual meeting with our membership on September 23, 2021 and we would be honored to have you address the Executive Directors and administrators from these 16 districts.**

We would also welcome the opportunity to discuss long term changes in school nutrition rules and regulations that would make it easier and more efficient to do the business of serving school meals. The pandemic has peeled back all the bureaucratic layers that need a through review for the doing it better in the future and being better business partners.

Sincerely,

*Kathryn T. Wilson, PhD, SNS*

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