



American Association of School Administrators

March 21, 2010

Committee on Agriculture, Nutrition and Forestry
United States Senate
Washington, D.C. 20510

Dear Senator:

The American Association of School Administrators, representing more than 13,000 school administrators and local educational leaders, would like to express our general support for the Healthy, Hunger Free Kids Act of 2010. This major investment of \$4.5 billion over the next decade in child nutrition programs will help ensure that children, especially those in poverty, are ready to learn as schools, communities and their families work to meet their nutritional needs. Despite our general support for the program streamlining and nutritional updates, we caution the committee to not pass new unfunded training and certification mandates onto local school districts especially in this economy.

Overall, school administrators across the country have supported efforts by Congress to streamline the National School Lunch program to ease the paperwork burden on school districts and families and to improve accuracy within the program. We strongly support the Healthy, Hunger-Free Kids Act's proposals to provide incentives to states to increase the percentages of students identified through direct certification and to expand the direct certification to Medicaid. Schools across the country are already doing outreach to enroll eligible children in Medicaid; it makes sense to combine those two efforts. Collectively, these efforts help reduce the amount of time school districts need to spend on the paperwork for eligibility already occurring in other federal programs.

In addition, AASA strongly supports the creation of special assistance payments for school districts that choose to provide free lunches and breakfasts to all children within certain schools or within the entire district. Many school districts often cover these additional costs in highly impacted schools in order to minimize the burden on individual children and their ability to pay. This represents a great benefit for those school districts that have taken this extra step and help minimize the required paperwork that goes along with program participation. We also support the hold harmless provisions in this section that help highly impacted districts weather the ups and downs they may have in eligibility from year to year.

We also strongly support the creation of the new national nutritional guidelines. We hope these new standards will lead to healthy eating in schools while also making it easier for schools to comply with. We recognize that serving more nutritious meals will cost additional funding and applaud the Healthy, Hunger-Free Kids Act for including a six-cent increase in the reimbursement rate. While we are not yet sure that this reimbursement rate increase will fully cover the costs of meeting the new nutritional standards we appreciate this important step toward recognizing that school districts will incur

additional costs in compliance. We also encourage the committee to maintain the important clarification that this would only apply to foods sold and therefore would not impact appropriate classroom celebrations and would allow for exceptions for school-sponsored fundraisers.

Despite all of these areas of support, AASA must express our strong opposition to the inclusion of the new national certification and training requirements for the personnel in the food service programs. These new requirements represent a federal mandate on all school districts to provide yearly training to all food service personnel without providing any funding to carry it out. Given the fact that school districts across the country are drastically cutting their budgets and laying off teachers, now is not the time to pass on a huge unfunded training mandate. In order to comply, local districts will be forced cut their already lean local budgets even further. Also, many states currently have requirements to provide training and some provide funding. We do not want to put districts in a position where the states no longer fund their training requirements because they see it as a federal requirement.

In addition, the national certification requirements place an unfair burden on school districts, especially those school districts that do not have a dedicated staff person serving in that position. For small and rural school districts it is often the school district business manager or principal who has the responsibility of overseeing the school food service program. Adding federal requirements to these already hard-to-fill positions will create even greater problems for rural and small schools. In No Child Left Behind, these same schools had to deal with the adverse impact of the unfair national standard of "highly qualified teachers." This made it difficult for school districts to comply with the federal law and created additional challenges for staffing. AASA would oppose the creation of a new national standard that does not take into account the individual staffing situations of local school districts.

Finally, AASA objects to the provisions in the bill that would allow the federal government to intervene in local school district budgeting decisions. From the school lunch price setting to competitive foods and indirect rates, local school districts should govern their own budgets, especially since the federal government only provides a small portion. Local districts and the students they serve generally find themselves on the losing end when the federal government tries to get local school district budgets to meet one-size-fits-all federal standards.

We urge the committee to eliminate the unfunded mandate provisions in the Healthy and Hunger-Free Kids Act and support the bill's proposed efforts to streamline the operation of the National School Lunch Act and improve the nutritional standards. If you need any additional assistance, please do not hesitate to contact me at 703-875-0733 or mkusler@aasa.org.

Sincerely,



Mary Kusler

Assistant Director, Advocacy and Policy