



To: Vermont House Committee on Agriculture, Food Resiliency, and Forestry

From: Betsy Rosenbluth, Kayla Strom, VT FEED

Date: March 10, 2026

Subject: Essential Elements for an Effective VT School Food Task Force ([H.868](#))

Prepared by: SNA-VT, Hunger Free VT, NOFA-VT, Shelburne Farms

Contact: Betsy Rosenbluth, brosenbluth@shelburnefarms.org

Dear Chair Durfee and Committee members:

As partners in the Vermont Farm to School and Early Childhood Network, we greatly appreciate the House Committee on Agriculture, Food Resiliency, and Forestry's continued commitment to ensuring access to high quality, scratch-prepared Farm Fresh Meals for all children, and we see clear pathways for how the committee can support this goal. Vermont's Farm Fresh School Meals for All innovatively and successfully combined Universal School Meals with a deep commitment to integrating local food and farm-to-school education. Today, more children eat, and eat well, and they learn where that food came from and the importance of VT Agriculture. However, many programs face significant roadblocks to cooking from scratch, and many children—especially our youngest—are still not being fed.

Expanding scratch cooking and reducing reliance on highly processed foods in school meals are goals that we share with the Committee and the sponsors of H.868. However, we do not believe that banning ultra-processed foods right now is the most effective delivery model for continuing to improve access to high-quality nutrition. Through our evaluations and our first-hand experience, we have identified many of the major obstacles that we face in child nutrition programs in the state, and we see some clear opportunities where the legislature can focus efforts to achieve positive results. Because we've been able to identify successful strategies that address barriers in the cafeteria, and because we are concerned about the capacity of essential stakeholders to participate in a task force, **we recommend instead that the Committee direct state agencies to identify the costs, capacity needs, policy and program considerations of the core strategies listed below and report back to the Committee, using existing program reports.** This will more efficiently allow Vermont to build on the success we have had to date to expand scratch cooking and use of local foods. The least nutritious meal that any child can eat at mealtimes is no meal at all, and the next steps that we take to improve meal programs must make nourishing food more readily accessible to all Vermont children.

Vermont Nutrition Programs' Foundation for Success

Vermont has made strategic investments in Child Nutrition programs that have been a great success, and we need to continue to make investments in our meal programs to continue the positive progress underway. In the past few years these transformational changes have included:

- Decisive legislative action to create Vermont's Universal School Meals program. Now, all Vermont schools serve meals at no cost to all students, resulting in 2.5 million more school meals served to kids each year.
- The Local Foods Incentive (LFI), enacted in 2021, has seen a growth in demand, driving well more than double the amount of local procurement than the incentive amount schools receive—a strong return on investment.

- The state’s innovative Farm to School and Early Childhood Grant Program has drawn direct links between what kids eat in the cafeteria and what they learn in the classroom—engaging kids in their food system and inspiring healthy food choices for years to come. It also supports CSA shares for early childhood programs entering local purchasing relationships with farmers.
- Essential funding appropriated for sponsoring organizations in the Child and Adult Care Food Program (CACFP) is maintaining the fragile support network for child care home providers to offer meals.
- The USDA Local Food for Schools program, launched in 2023, strengthened VT’s farm to school supply chain by enabling every district to purchase local foods while building lasting relationships with local food hubs. When USDA cut funding for the second round in Spring 2025, Vermont FTSEC partners worked with the committee to secure \$500,000 in one-time state funding to replace the last-minute loss of federal support and expand the program to early childhood.

These changes have laid the strong foundation for Child Nutrition programs in Vermont to continue to grow and improve. **We are currently working on a variety of initiatives that build on these successes and support continued growth & improvement in child nutrition programs across the state, in spite of federal cuts.** The committee's consistent support of Universal School Meals, the Local Foods Incentive, and the Farm to School and Early Childhood grant program has been essential to making these innovations possible.

- The Agency of Education - Child Nutrition Programs (AOE-CNP) has committed significant technical assistance time to supporting schools with Food Service Management Companies (FSMCs) to add contract stipulations that require local, high quality food to be served and creating enforcement mechanisms for their contracts. The growth in LFI demand is partially from these changes.
- Hunger Free Vermont is working with school districts in Addison and Windham Counties to partner with off-site Universal Pre-K programs to extend their Universal School Meals to additional eligible children and develop a model that other districts can utilize.
- AOE-CNP is partnering with the Mount Abraham School District Director to expand on their menu planning toolkits and develop a toolkit for afterschool snacks.
- Essex-Westford School District and Windham Northeast Supervisory Union pioneered innovative non-congregate summer meals options that helped those two districts feed more kids in 2023 than the entire state did in 2019. Their models are spreading to other districts, and the state, already a leader in summer meals access nationwide, has tripled the number of meals served since 2019.
- Windham Northeast SU, and several other school districts have innovatively partnered with Miller Farm in Vernon to provide local, organic milk in an affordable and sustainable way for child nutrition programs. This model is also spreading, and more local dairies are interested in partnering.
- NOFA-VT, school nutrition partners, and local producers across the state are working to develop more child nutrition-friendly local food substitutions. As demand for local foods in meal programs has grown through the Farm Fresh School Meals for All campaign, it has become increasingly important to ensure that supply of local products can meet the strict requirements of child nutrition programs. Schools often want to source local alternatives but face challenges finding products that meet their quantity needs, product specifications, and storage requirements. Key products have been:
 - Local bakery items that replace commonly used school meal products often made with ultra-processed ingredients
 - Minimally processed vegetables suitable for large-scale food service

- Greater access to center-of-the-plate proteins including local beans and beef.
- The Vermont Agency of Agriculture, Food and Markets' Farm to Institution Market Development Grant has greatly helped support this work. In 2024, NOFA-VT received funding to support four bakeries in developing products tailored to the needs of child nutrition programs. This state grant served as a catalyst for additional investments from federal and private grants, helping three bakeries with equipment purchases ranging from \$40-80k to scale their productions to serve more child nutrition programs.

Even with these powerful program advancements, there are still very significant needs to address in child nutrition programs in our state that we have seen first-hand and in our evaluations.

- Federal reimbursement rates fall short of covering the cost of providing high quality meals; a [USDA cost of meals study](#) released in 2019 found that the average cost of producing a meal exceeded federal reimbursement for both breakfast and lunch, and more than a quarter of school nutrition programs spent more than \$3 on a breakfast in 2014, when the regular federal reimbursement rate was only \$1.88. The reimbursement rate still has yet to pass \$3.00, now, eleven years later.
- Despite eliminating the need for students to pay for school meals, less than half of students get breakfast on any given day due to scheduling and timing challenges.
- We still have schools in this state with no kitchen or cafeteria in which to serve meals, or inadequate kitchens and equipment for cooking from scratch.
- Meals in early childhood lag far behind, and only 40% of registered or licensed child care programs participate in federal nutrition programs (CACFP) at all.
- The state LFI has been so successful that grant eligibility has surpassed the appropriation this year, and AOE has had to prorate grant awards.

These are the immediate barriers, challenges, and opportunities that we need to address if we want schools to increase scratch cooking or improve meal quality. We need to invest in grant programs that are working, local food incentives, staff capacity, equipment, and time for menu development, training, & meal service.

Unfunded Mandates & Restrictions are Not the Best Way to Improve Meal Quality

Whole, scratch-cooked food takes significant time to produce and requires well-equipped kitchens and well-trained staff. That, in turn, requires buy-in and prioritization of meal times from school administrators, teachers, and staff. **Simply changing the meal pattern that schools have to follow does not equip school nutrition program staff with this buy-in and does not ensure that kitchen staff are given adequate time and space to cook and serve meals.** An ultra-processed food ban is not a no-cost solution. Schools would have to make staffing, infrastructure and/or equipment improvements, and this cost could be borne directly in school budgets and by property taxes if no direct funding was provided. For example, [California has allocated \\$750 million for infrastructure upgrades in school food programs to support their broader commitment to more scratch cooking.](#)

Policies that focus on banning or restricting specific foods in school meals risk addressing only a small portion of the larger food system challenge. Schools operate within a highly regulated environment and rely on foods that meet federal nutrition standards and are also familiar to students. If familiar foods are removed without viable alternatives that students accept, participation can decline.

Additionally, the recent release of the new Dietary Guidelines for Americans (DGA) by the federal government means that [there are new regulations coming to CN meal patterns from USDA](#) in the near

future. Indications point to these regulations coming out at the end of this year, after this task force will have finished its work and delivered its report, making the work of the task force immediately out of date if the focus of the task force is restrictions to what schools are allowed to serve.

Core Strategies to Strengthen Farm Fresh Meals for All VT Children

In order to strengthen quality meals in schools and childcare settings, Vermont must address the following program pressures:

1. *Expand the LFI.* This is a proven, effective intervention, but requests from schools have already exceeded funds available; the 14 SFAs that qualified for the grant in AOE's most recent report accounted for \$1.2 million in local food purchasing—mostly raw, whole foods. The incentive gives entire school communities something to buy into and work towards, generates support from administration, and is leading to more farm fresh meals served in school while supporting VT producers. AOE anticipates further demand for these grants over the next few years. Additionally, there is significant opportunity to expand this program to incentivize scratch cooking and connect its success to early childhood programs.
2. *Grow Infrastructure grants for child nutrition programs to allow for more scratch cooking.* Some programs face very significant physical barriers to scratch cooking—with some even lacking kitchens entirely. Expanded infrastructure grants that could support the development of adequate kitchen spaces and storage would be essential for many schools to incorporate more local food and cooking from scratch.
3. *Support the vibrant Farm to School and Early Childhood Grant Program at the Agency of Agriculture, Food, and Markets.* The Farm to School and Early Childhood Grant Program combines meal program development, local food, and food system education to provide a nurturing learning environment for kids that facilitates direct connection to food and develops students' relationships with VT agriculture. We know that meal programs that access technical assistance through the grant, have furthered their successes with expanding local and scratch foods. In addition the VAAFM Farm to Institution Market Development grant is a critical tool to helping increase the supply of local foods available to child nutrition programs.
4. *Enact administrative policy that supports inter-agency coordination and a clear meal program on-ramp for new early childhood education programs into CACFP during licensure.* Meal programming in child care and child care licensing live within two separate state agencies. At this time, there is little alignment between child care program licensing and child care meal program onboarding. We often hear from child care programs and CACFP sponsor organizations that it is a lot more difficult to add on meal programming to an already-established child care program than it is to intertwine meal programming support from the beginning. Intentional inter-agency alignment between the Child Development Division at the Agency of Human Services and the Child Nutrition Department at the Agency of Education would support meal programming being built into the initial phases of child care program onboarding and would bolster expansion of child nutrition programming in early childhood settings.

We believe that the most effective and efficient next step is for the relevant state agencies to assess and report on what is needed to move forward these core strategies, using the annual reports they are obligated already to submit to the legislature. Specifically, we recommend that AOE-CNP include this analysis within its Local Foods Incentive Report due January 2027, and that VAAFM address it within the Farm to School & Early Childhood Grant Program report, due January 2027. These reports could outline the costs, capacity needs and program considerations associated with expanding the LFI, growing child

nutrition infrastructure grants, strengthening the Farm to School & Early Childhood Grants Program and improving inter-agency coordination for early childhood meal program access. The committee should request the Child Development Division report back on what is needed and how to take steps to effectively incorporate meals into new early childhood program onboarding. We are concerned that a task force could draw organizational capacity away from technical assistance, training, and on the ground efforts. Using existing reporting structures would still allow the legislature to better understand the resources and administrative steps required to build on Vermont's current successes and ensure more children benefit from farm fresh school meals.

Conclusion

We are sincerely grateful to the House Committee on Agriculture, Food Resiliency, and Forestry for your sustained commitment to quality nutrition for Vermont's children. We are eager to continue partnering with the committee to focus efforts on policy priorities that will strengthen Vermont's Farm Fresh Meals for all kids by fortifying child nutrition programs and supporting farmers.