
TESTIMONY

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

Respectfully Submitted by: Rosie Krueger, State Director of Child Nutrition Programs

Subject: H. 868

Date: March 11, 2026

Summary

The Agency of Education (AOE) has significant concerns regarding the proposed direction of H. 868, specifically the establishment of a task force to study how to improve school meal quality. We do not think that a task force to study these issues is the most effective use of extremely limited resources at AOE, as the factors contributing to improved meal quality are already well understood. Redirecting resources to the task force would disrupt ongoing efforts to enhance meal quality. We also have concerns about the timing of the task force, given upcoming federal updates to meal patterns that will likely render the task force's recommendations obsolete, and an ongoing UVM study on the topic that will be published next year. AOE urges the committee to reconsider the bill and instead allow us to continue our work on concrete technical assistance efforts that directly support high-quality meals for Vermont's students.

Current Status of Meal Quality in Vermont

In my oral testimony, I will share an update on current school meal quality in Vermont, and how that has changed for the better over the past 15 years, including significant recent improvements over the past 1-5 years. I will share the reasons for those improvements. I will also discuss in-progress projects that are continuing to improve meal quality, and which will be disrupted by dedicating resources to this task force.

Factors Impacting Meal Quality

AOE questions the value of this task force, because factors leading to improved meal quality are already well known. They are primarily related to adequate funding. The committee may be interested to refer to the [School Nutrition Association 2025-2026 School Nutrition Trends report](#), which summarizes survey data from school food service directors on the resources needed to reduce reliance on ultra-processed foods and to increase local purchasing. The top barriers are all around insufficient funding, while lesser needs, such as staff time to cook meals, develop recipes, and receive training, are also related to funding. These results are well supported by the AOE Child Nutrition team's experience monitoring and supporting Vermont school meals programs. Similar findings around inadequate funding being



the greatest challenge to improving nutritional quality are documented in USDA's [School Nutrition and Meal Cost Study](#), published in 2019.

Recent increases in school meals funding in Vermont have resulted in improved meal quality. AOE's [recent report to the Legislature on the Local Foods Incentive](#) documents how additional funding tied to local purchasing has been highly successful in shifting food purchases to local products over the past 5 years. Following the implementation of Universal School Meals in Vermont, AOE noted a dramatic decrease in the amount of less nutritious a la carte items sold by school meals programs. Selling these foods had previously provided an essential source of funding to the programs. As soon as food service programs had a reliable source of funding in the form of the state Universal Meals Supplement, they could and did stop offering these less nutritious a la carte items.

A UVM researcher is currently conducting a research study specifically into questions around vegetarian meals and processed foods in Vermont school meals programs. The researcher is looking into some interesting questions beyond funding, such as acceptability and attitudes – but she does not anticipate being able to share findings until next year – after this task force would conclude its work.

Timing

We have additional reservations about the timing of the task force in Summer/Fall 2026. The federal government is currently working on updated meal patterns for the child nutrition programs to reflect the Dietary Guidelines for Americans 2025-2030. The meal pattern is the set of federal regulations around the nutrition standards that meals need to meet to receive federal school meals reimbursement. It is anticipated that those new meal patterns will be finalized in December 2026, likely going into effect for school meals programs in July 2027. Based on the new dietary guidelines, it is likely that the new meal patterns will add significant restrictions to added sugars in the programs, and they may also restrict processed foods or encourage scratch cooked foods. Whatever changes are made will apply to Vermont meals programs, likely making any recommendations of the task force almost immediately out of date.

Impact on AOE Core Work and Efforts to Improve Meal Quality

The task force that the committee is discussing is currently conceived to meet at least monthly between late August and December 2026, with administrative, technical, and legal assistance from the Agency of Education. The questions proposed for the task force are wide-ranging and the task force is required to issue a report on their recommendations. Based on the Agency's past experience with similar task forces, the preparation for and support for such a task force would require significant AOE staff time. The committee is not currently considering providing any additional resources to AOE to support this work.

At a practical level, asking AOE staff to serve on and staff a task force without providing additional resources to AOE risks drawing our attention away from critical core work ensuring that over \$45 million in federal funding continues to flow to school meals programs. Over the past year, the AOE Child Nutrition team has had to react quickly on

numerous occasions to ensure that this funding is not disrupted by the everchanging federal situation, and we anticipate similar demands in the coming year. In the current environment, there is also a heightened need for AOE to be in complete compliance with strict federal oversight and reporting requirements, and far less assistance from federal partners in staying in compliance with these requirements.

Even if we were able to maintain our core work while serving on and supporting the task force, dedicating time to a task force will certainly redirect our time away from the concrete technical assistance work that we are engaged in to increase meal quality in Vermont schools. Examples of ongoing and planned work that would be impacted by redirecting our time include:

- Between May and October, the team plans to assist schools in re-starting CEP cycles to lock in federal funding formulas based on data from before federal SNAP changes impacted the programs. This work will maximize the federal funding available to these programs until 2030.
- The team is engaged in ongoing work with schools, non-profit partners, and the AOE's Expanded Learning Opportunities team to increase sites offering [after school](#) and [summer meals](#), which are fully federally funded. School meals programs have reported that operating summer meals programs has allowed them to subsidize higher quality meals during the school year with federal summer meals funds, as the reimbursement rate for summer meals is significantly higher than school year rates. This work to maximize summer meals directly responds to the need to increase funding in order to increase meal quality, while also increasing nutrition supports for children outside of the school day.
- Over Summer 2026, we plan to complete work on a report synthesizing the results of interviews with seven self-operated school food authorities that operated high quality school meals programs and received the Local Foods Incentive in 2025, without requiring supplemental funding from their local school budget. The interviews have been conducted, and the report has been drafted. After publishing the report, we plan to create trainings, templates, and guidance materials related to best practices uncovered in the report.
- We plan to continue ongoing work to assist school food authorities that contract with food service management companies to increase meal quality by continuing to refine suggested language around meal quality in the template RFP, and assisting schools in holding management companies accountable to contract requirements. Beginning this summer, we plan to publish a compilation of administrative review findings related to FSMC non-compliance, which will assist SFAs in evaluating responses from potential FSMCs and alert them to areas of potential non-compliance. This is a successful practice we are adopting from other states.
- We are working to publish a seasonal cycle menu toolkit for after school snacks, similar to our existing [seasonal cycle tool kit for lunch](#), to make it easier for schools to offer higher quality, scratch cooked and locally sourced after school snacks. Providing these toolkits also helps schools contracting with food service management companies by providing them with a high-quality sample menu that can be used in the contracting process.

- As conversations around school district consolidation continue, we plan to continue providing support to food service directors and business managers about:
 - best practices for operating efficient food service programs across larger districts;
 - working together to operate shared programs across multiple districts (such as the model collaboration between [Mt. Abraham USD and Addison Northwest SD](#));
 - sharing resources such as staff, purchasing contracts, menus, and training, all in the interest of higher quality meals;
 - collaborating on in-house bakeries and other in-house specializations that could provide scratch-made products to all schools in a region. Some districts have already begun these conversations, and we plan to continue elevating these ideas and supporting these initiatives.
- As several districts are entering into major renovations and considering new construction, we plan to continue [ongoing work](#) to support to districts that are renovating or constructing kitchen facilities to maximize federal funding for this work and continue collaborating with the AOE's Safe and Healthy Schools team to ensure facilities are thoughtfully designed to meet program needs and that districts have support in navigating complex federal requirements related to construction with federal funds.
- This summer, we anticipate providing thorough and thoughtful feedback to USDA in response to the anticipated proposed rule to update the child nutrition meal patterns to reflect the Dietary Guidelines for Americans 2025-2030. Examples of prior AOE comments include [2023 comments on proposed meal pattern changes](#) and [2025 comments in response to a USDA request for information on Grain-Based Desserts and High-Protein Yogurt](#). Evaluating these proposals and providing constructive feedback is time-consuming, but is one of the most effective levers to ensure that future federal requirements support high quality meals.
- This fall, we plan to continue conducting outreach to schools that have not yet engaged with the Local Foods Incentive to encourage them to apply. As a result of prior efforts, a number of districts that contract with food service management companies have now included LFI-related requirements in their contracts. We anticipate needing to provide assistance to these districts to monitor compliance with these contract requirements.
- This fall, we plan to engage with school food service directors, the Agency of Agriculture Food and Markets, and advocates in discussions about whether to recommend any updates to the Local Foods Incentive during the 2027 legislative session. Given the success in the initial 5 years, we anticipate discussions about whether to recommend adding additional thresholds below or above the current thresholds, whether to recommend adding an inflation factor, and considering whether there is enough Vermont milk available to program operators to recommend adding fluid milk into the program. As we do every year, we will continue to evaluate how we operate the incentive program to see if there are additional ways that we can reduce the paperwork burden for applicants.
- We are collaborating with Shelburne Farms to offer our 2026 Child Nutrition Summer Institute, which will be held in mid-August. This [annual professional](#)

[development opportunity](#) for school food service staff covers topics like menu development, culinary skills, food safety, purchasing local foods, and best practices for program management.

- As our USDA Farm to School State Formula grant ends on September 30, we plan to evaluate next steps for the project that we funded to bring a local 4-ounce apple cider product to market. We see this as an opportunity to replace the non-domestic juice cups that are a common Buy American violation during school meals administrative reviews with a higher-quality Vermont product.
- This fall, we plan to continue offering tailored technical assistance visits to struggling school food authorities to offer suggestions and best practices for the unique challenges faced by their programs. Past on-site TA visits have resulted in site-specific recommendations around staffing inefficiencies, cafeteria layout, more efficient modes of offering meals in the classroom, and ideas for improving the menu and increasing meal quality. We have already seen significant improvements from SFAs who requested TA visits in the last several years.

These projects are the work that the AOE Child Nutrition team wants to be doing with our time. Like the committee, we strongly support high quality meals for Vermont's kids. We think that these concrete technical assistance efforts will be more effective at achieving this goal than serving on and supporting the task force proposed by draft 1.1 of H. 868, and we strongly urge the committee to reconsider moving forward with this bill.