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Illinois School Nutrition Association

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Kosher and Halal Bills Talking Points

Access to Halal and Kosher Foods

After reviewing the bills in the Illinois General Assembly requiring schools and other food providers to offer kosher and halal meals to program participants, one of ILSNA's primary concerns is access to kosher and halal meals.

- Primarily, the availability of kosher and halal meals and products through both vendors as well as those that are prepackaged from an outside source varies greatly depending on SFA purchasing power, volume and geographic location. Ongoing inflation and supply chain disruptions will also limit schools' ability to access approved products.
- Prepackaged meal providers are often not familiar with NSLP guidelines including those for required component offerings and sodium and calorie restrictions which will require SFA's and meal providers to provide significant oversight and education for these organizations, which is increasingly difficult with current supply chain and staffing concerns.
- Schools' ability to prepare and store these meals is often dependent upon factors outside of the director's control including limited kitchen space, equipment, power sources, and other facilities-related factors.
- The proposed bills require SFA's and other meal providers to offer items that are certified halal and kosher. While many plant based items fit these requirements, not all are certified. Limiting offerings to only certified halal or kosher products drives up cost for meal providers and significantly limits the items they are able to offer. Limited options result in student boredom with the menu, and often lead to a decrease in participation.

Financial Implications

School nutrition programs are self-sustaining operations within their school district and must cover the cost associated with serving school meals through federal reimbursements and paid meal revenue. These costs include food, supplies, equipment, labor, and benefits. The bills as written do not allocate any funding to assist schools in providing certified halal and kosher meals. Illinois currently only provides \$0.02 for every free lunch a breakfast served, which is only 13% of the reimbursement stated in the Illinois school code. ILSNA is concerned about the financial detriment the proposed bills could have on school nutrition programs.

- The cost of certified halal and kosher products is double to triple the cost of comparative standard products and will vary drastically depending on the volume needed by a district. Districts looking to secure a high volume of products will be able to get more competitive pricing than districts requiring a low volume.

- In order to prepare certified halal and kosher meals, costly training will be required for staff to understand and comply with strict dietary requirements and ensure that once items are delivered to a kitchen, stored, prepared and served, the end product is still certified as halal and/or kosher.
- Separate equipment and designated staff members will likely be needed to purchase, store, prepare, and serve certified halal and kosher meals while maintaining strict religious dietary laws. The cost of equipment alone could cost between \$10,000 and \$100,000 per school; under current maximum reimbursement rates, an additional 20,500 lunches would need to be served to cover \$100,000 in equipment.
- School nutrition professionals have learned the hard way that just because we provide a meal that meets given requirements, this does not guarantee that students will like the food. The high equipment, labor, and food costs associated with these unfunded proposed bills would leave schools in a very precarious financial position if the changes do not result in an increase in participation, and therefore revenue.

Operational Challenges

Large and small school nutrition programs, both self-operation and districts that use contract management companies, will be faced with significant operational challenges in order to comply with the strict dietary rules that must be followed to be certified halal and/or kosher.

- Families may follow halal and kosher laws to differing degrees and may have different expectations of the food that will be served in schools.
- The potential need of a designated staff member to execute handling and preparation of certified halal and kosher meals is unrealistic given today's staffing shortages. Preparation of halal and kosher meals for non-traditional school meals programs, such as summer meals or afterschool meals would be doubly challenging since staffing for these programs is typically limited.
- Separate, dedicated equipment is likely to be needed for the storage and preparation of certified halal and kosher meals, but most schools simply do not have the space for this additional equipment.

Suggested Changes and/or Requests

The dietary laws governing kosher and halal preparation of meals are complex and unfamiliar to many school nutrition professionals. All SN employees will need to be properly trained to ensure all laws are followed. Prior to state-wide implementation of the proposed bills, ILSNA recommends a small pilot program in several districts, diverse in geographic location, student enrollment, purchasing power, self-operated or food service management company, etc. to identify strengths and needs in order to implement successfully across the state. Additional recommendations include:

- Collaboration with Halal/Kosher organizations to determine reasonable and realistic implementation and execution strategies.
- Incorporating the use of "within reason" verbiage to the proposed bills. This is similar to federal allergen regulations in school meals programs. This would allow districts to scale the implementation of the proposed bills according to the number of students requesting meals:
 - Some schools may serve pre-made certified kosher/halal products but provide transparency that they are unable to prepare the meals separately.
 - Some schools with larger percentages of Muslim/Jewish students may have sufficient purchasing power to buy vended meals or have dedicated equipment/staff to prepare meals on-site.

- ILSNA strongly recommends that there be additional reimbursement and/or funding to the individual SFA to assist with the administrative, procurement and implementation of halal/kosher meals.
- Training/education/guidance from state on meal pattern accommodation, and guidelines for safe handling by ISBE including approved forms for necessary accommodations.