



December 20, 2013

William Wagoner
Policy and Program Development Branch
Child Nutrition Division
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive, Room 1212
Alexandria, VA 22302-1594

Dear Mr. Wagoner:

The School Nutrition Association (SNA) represents 55,000 members supporting school meal programs nationwide. We read with great interest the request for comments in response to USDA's *National School Lunch Program and School Breakfast Program: Eliminating Applications Through Community Eligibility as Required by the Healthy, Hunger-Free Kids Act of 2010* (RIN 0584-AE16).

Members of SNA share the goal of feeding hungry children and minimizing administrative burdens. As USDA implements CEP, we want to encourage:

- flexibility in operation of programs;
- adequate tools for food service directors and school nutrition staff to be able to present CEP as an option to decision makers and stakeholders in their district;
- suggestions for alternatives for data collection among school districts (the importance of the data from the free and reduced application collection to other entities and programs within the schools cannot be underestimated as a hurdle to CEP's success);
- research into the cost and financial impacts of program implementation;
- research driven solutions as issues arise with implementation;
- circulation of best practices among eligible LEA's and schools to assist in their preparedness and full understanding of CEP as an option for managing their programs.

SNA would like to support the process; and hopes that USDA will consider SNA as a resource prior to and throughout the national implementation process. Thank you for your consideration.

Sincerely,

Leah Schmidt, SNS
SNA President
cc. SNA Board of Directors