



**Feeding Bodies. Fueling Minds.™**

September 23, 2019

Program Design Branch  
Program Development Division  
Food and Nutrition Service  
U.S. Department of Agriculture  
3101 Park Center Dr.  
Alexandria, VA 22302

Docket ID Number [FNS–2018–0037]

Dear USDA Food and Nutrition Service:

On behalf of the 58,000 members of the School Nutrition Association (SNA), we appreciate the opportunity to provide comments on the Food and Nutrition Service's (FNS) Proposed Rule, *Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP)*, published in the Federal Register of July 24, 2019. SNA's membership is comprised of school nutrition professionals serving K-12 schools, college level academic instructors/professors in related fields, State Agency personnel administering Federal child nutrition programs and other related professionals. Our vision is that every student has access to nutritious meals at school, ensuring their optimal health and well-being. SNA is concerned this Proposed Rule will result in many needy children losing access to free school meals and some schools that have successfully implemented the Community Eligibility Provision (CEP) losing access to this valuable program.

This Proposed Rule is applicable to revisions in the Supplemental Nutrition Assistance Program (SNAP); however, it has a significant impact on school nutrition programs administered by our members. The flexibility offered in the broad-based categorical eligibility (BBCE) option was designed to address unique circumstances and needs in various states as they work to support low-income working families. SNA urges USDA to consider those unique needs and the reasons for implementation of BBCE before promulgating a Final Rule.

Although benefits offered through the National School Lunch (NSLP) and School Breakfast Programs (SBP) are not referenced in this Proposed Rule, students whose families lose SNAP eligibility as a result of the rule will no longer automatically qualify for free school meals. Some of these families will not realize that they need to apply for meal assistance, resulting in students being denied a meal in the cafeteria or schools amassing unpaid meal debt. Other families, hesitant to complete an application due to language barriers, stigma and other obstacles, will have their students go without.

Research shows school meals support academic success, obesity prevention and overall student health by improving children's diets and combatting food insecurity. Food insecurity is linked to negative health, development and educational outcomes, such as slower progress in math and reading and a

higher likelihood of repeating a grade. Hungry students cannot learn and are often disruptive in class. We should be working to ensure *more* students have access to healthy school meals.

The proposed rule will also impact school meal programs. School nutrition professionals will be burdened with substantial increased workloads and costs from outreach, paperwork and processing of applications for impacted families. Meanwhile, with fewer students directly certified for free meals, some schools may lose their eligibility for the Community Eligibility Provision (CEP). CEP expands access to school meals, reduces stigma for participating students, eliminates paperwork for families, streamlines meal service, reduces administrative costs for schools and eliminates unpaid meal charges. Schools forced off CEP would lose all these benefits and accrue significant administrative costs when returning to the meal application process.

*Should this Proposed Rule be finalized, SNA has several recommendations:*

To mitigate the impact of this Proposed Rule on school nutrition administrative burdens and program participation, SNA recommends that FNS explore opportunities to expand data matching with a verified third party. Through categorical eligibility and data matching, the direct certification process has vastly improved the meal eligibility benefit process in the school meal programs. In addition, through the Medicaid Demonstration Pilot Program, eligible states have been able to reduce the burden of income verification on school districts. These program components of data matching with a verified third party has allowed programs to operate with confidence and integrity.

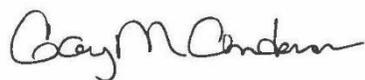
Confusion and uncertainty about the impact of this Proposed Rule should be addressed through robust outreach and an inclusive communications effort. The FNS divisions that oversee the Temporary Assistance for Needy Families (TANF), SNAP and school nutrition programs should coordinate notifications of updates to stakeholders and households to ensure the use of correct and consistent terminology and provide a thorough explanation of any changes.

In addition, a comprehensive outreach program to stakeholders and households must include buffer time to ensure impacted families have adequate time to complete alternative documentation or applications so students receive meals without interruption. Across Federal and State agencies, all stakeholders must work together to maintain access to school meal benefits for all eligible children. In addition, the school meal eligibility application should be designed and written in lay person's language so it is easy to understand.

Schools have worked hard for decades to expand access and increase participation in school meal programs - we cannot afford to compromise this progress.

Thank you for your consideration.

Sincerely,



Gay Anderson, SNS  
President



Patricia Montague, CAE  
Chief Executive Officer