



Feeding Bodies. Fueling Minds.™

November 1, 2019

Mr. Stephen L. Censky
Deputy Secretary
U.S. Department of Agriculture
Office of Policy Support
Food and Nutrition Service
3101 Park Center Drive
Alexandria, VA 22302

Docket ID Number [FNS–2018–0037]

Dear Mr. Censky:

On behalf of the 58,000 members of the School Nutrition Association (SNA), we appreciate the opportunity to provide additional comments on the Food and Nutrition Services' (FNS) Proposed Rule, *Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP); Reopening of comment period*, published in the Federal Register on October 18, 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 remains that every student has access to nutritious meals at school, ensuring their optimal health and well-being.

As stated in our previous comments, SNA is concerned that this Proposed Rule change will result in many needy children losing access to school meals and that school districts will face additional costs and administrative burdens, disrupting the design and operation of the school nutrition programs administered by our members. Revisions in the Supplemental Nutrition Assistance Program (SNAP), will have a negative impact on other child nutrition programs including programs administered by our members.

The informational analysis, *Potential Impacts on Participants in the National School Lunch Program and School Breakfast Program*, is concerning. The analysis states that close to one million children will lose direct certification for free school meals, requiring a return to applications. This is a setback to the current data matching successes that have dramatically reduced the administrative burden and costs from outreach, paperwork and processing of applications. The processing of individual applications will require additional staff time and will be burdensome on districts that have successfully streamlined the meal eligibility process through the application of technology resources.

In addition, some of the impacted families will not realize that they need to apply for school meal assistance, resulting in students being denied a meal in the cafeteria and schools amassing unpaid meal debt. The analysis states that a significant number of students would be changed from free (130% federal poverty level) to reduced (185% of the federal poverty level) or paid status. Many households across the country have difficulty paying even the reduced-price meal cost for school meals. Students from households that cannot provide the reduced-price or paid fee will go without or be provided a

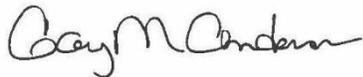
meal at the school district's expense, further adding to unpaid meal debt. As USDA knows, the school districts are already struggling with unpaid meal debt, including reduced price meal debt.

The revision analysis mentions that some schools are Community Eligibility Provision (CEP) schools for the meal service design. Schools implementing CEP have shown district-wide benefits such as academic improvement, reduced administrative costs, and elimination of unpaid meal debt. Eligibility for CEP is based on a data match of students directly certified from other federal programs, including SNAP. The Individual Student Percentage (ISP) factor is the basis of determining eligibility in the program as well as the funding level for the school district. For many school districts, this Proposed Rule will result in the ISP dropping to a level that will make CEP unsustainable. What a shame it would be to disrupt the many school districts seeing district wide academic improvement and benefiting from the CEP model.

School districts have worked tirelessly to implement the school meal programs as part of the whole school day and to educate and nurture the whole child. We must work together to maintain access to school meal benefits for all children. Please find attached to this a copy of the comment letter submitted to the prior comment request related to the Docket Number FNS-2018-0037.

Thank you for your consideration.

Sincerely,



Gay Anderson, SNS
President



Patricia Montague, CAE
Chief Executive Officer