



May 8, 2023

Ms. Michelle Frey
Branch Chief
Policy Design Branch
School Meals Policy Division—4th Floor
Food and Nutrition Service
1320 Braddock Place
Alexandria, VA 22314

ELECTRONIC DELIVERY

Dear Ms. Frey:

The School Nutrition Association (SNA), representing 50,000 school nutrition professionals nationwide, appreciates this opportunity to submit comments on the proposed rule, *Child Nutrition Programs: Community Eligibility Provision-Increasing Options for Schools*, published in the Federal Register on March 23, 2023.

Community Eligibility Provision (CEP) has provided numerous benefits to participating school meal programs and the students and families they serve. By allowing eligible schools to offer free meals to all students without an application, CEP eliminates long-standing barriers to healthy school meals, ensuring every student is nourished for success. As such, we greatly appreciate USDA's ongoing efforts to expand access to CEP and support implementation of the program. In states or localities that have committed funds to providing free meal service for all students, this proposed rule would allow more schools to participate in CEP to reduce administrative and operational burdens.

However, as noted in the proposed rule, CEP is not financially viable for all eligible school meal programs. In the absence of an increase to the CEP multiplier, the program will remain infeasible for school meal programs that lack additional state or local funds to cover any gap between operational costs and federal reimbursements.

A recent [SNA survey](#) of school nutrition directors revealed school meal programs face mounting financial pressures and growing unpaid meal debt. On July 1, 2023, school meal programs are slated to lose the additional \$0.15 per breakfast and \$0.40 per lunch Congress provided under the Keep Kids Fed Act. Programs will be ill-equipped to cover basic operational costs, let alone the additional costs of implementing CEP in schools where the Identified Student Percentage (ISP) is below the 62.5 percent threshold allowing all meals to be reimbursed at the free rate.

SNA would appreciate USDA's continued advocacy for Congress to increase the CEP multiplier to allow more schools to successfully implement the program, and for other measures to expand access to free school meals for all students, including eliminating the reduced-price category and making permanent the Direct Certification with Medicaid pilot program. We also urge USDA to advocate to make

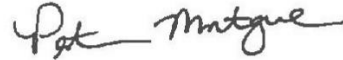
permanent the reimbursement rate increase provided under the Keep Kids Fed Act, to help ensure school meal programs can cover basic operational costs.

Thank you again for your ongoing efforts to support CEP implementation and increased access to nutritious school meals.

Sincerely,

Handwritten signature of Lori Adkins in black ink.

Lori Adkins, MS, SNS, CHE
President

Handwritten signature of Patricia Montague in black ink.

Patricia Montague, FASAE, CAE
Chief Executive Officer