



National School Boards Association
1680 Duke St. FL2, Alexandria, VA 22314-3493
Phone: (703) 838.6722 • Fax: (703) 683.7590
www.nsba.org

Via Online Submission to <https://www.regulations.gov>

November 1, 2019

The Honorable Sonny Perdue
Secretary
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Mr. Brandon Lipps
Deputy Under Secretary
Food, Nutrition, and Consumer Services
U.S. Department of Agriculture
3101 Park Center Drive
Alexandria, VA 22302

Re: Updated Analysis of the Revision of Categorical Eligibility in the Supplemental Nutrition

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children. ¹ This report also notes that the prevalence of food insecurity among children was near the 2007 pre-recession level of 8.3 percent. the

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implementation, or discontinue services

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In addition, many public schools with populations of food insecure students are already working with food pantries and other emergency food providers to ensure that children are receiving sustenance on weekends and holidays. If this NPRM is promulgated, the fiscal impact on those schools and districts would be egregious, forcing them to stretch already limited resources to maintain this work, given the increased need of families who would no longer receive assistance through SNAP.

Reducing the eligibility of some to participate in these programs is counter to the federal nutrition guidance given. As our school boards and USDA are aware, the school food service program is an integral part of the educational environment. The shared goal of all the partners involved is the achievement of children, and the school should provide the best opportunity for them to succeed. Part of that goal is to ensure that children are healthy, well nourished, and able to take advantage of educational opportunities offered to them in the classroom and beyond.⁸

Again, NSBA urges that the paid meal price be eliminated or reduced, since it has resulted in unnecessary price increases for certain students; and, that it could exacerbate food insufficiency and lunch shaming on more students and families, such as those identified by USDA as having to pay the paid meal price in its updated analysis of this NPRM. Particularly for families that are providing for multiple children throughout the school year, the paid meal price, or full-price lunch, is unaffordable. More than 40 percent of school districts have seen an increase in the number of students who are not certified for free meals and do not have the funds to pay.⁹ Additionally, NSBA urges that reimbursement rates be increased to cover the cost of compliance; that flexibility be authorized for local school districts to make implementation feasible within available federal resources; and, that the eligibility determination process for enrolling students be streamlined.

Recently, the Alabama Association of School Boards and other education policy leaders in Alabama in addition to disrupting local practices that have already been successful in helping address equity in educational opportunity, food insecurity, and lunch shaming among students. According to the Alabama State Department of Education, 460 schools would be impacted, as they currently provide . If fewer students qualify for free meals through this proposed change to SNAP eligibility, some of those 460 schools could no longer meet the 40 percent threshold (regarding CEP and Title I schoolwide programs), and would be forced to stop free meals to all.

For example, Roanoke City Schools in Alabama has provided free meals for all students for three 87 on the recent state report card.

He added that the biggest impact

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removed.¹⁰

NSBA ensure meaningful consultation and increase stakeholder engagement through previous roundtables with school board members and other advocates. Likewise, NSBA urges the Department to establish advisory committees that include school board members to provide insight and recommendations to the USDA and other related federal and state agencies to ensure the nutritional value, safety, and affordability of foods served in school lunch, breakfast, and snack programs. Furthermore, NSBA urges that efforts to address program integrity be reviewed by Congress, including threshold eligibility limits to address factors such as local cost-of-living and concentration of poverty, in a way that balances the needs of families and children most in need.

Accordingly, NSBA urges you to rescind this proposed rule, as it would have a disproportionate impact on the most vulnerable students educated by our public school districts; and, could very well cause a negative impact on student learning, family engagement, and ongoing operational agreements between school districts and other agencies vital to school district resources.

NSBA looks forward to working with you and Congress to address this priority to assure the continuity and effectiveness of child nutrition programs in our public schools. Please contact Deborah Rigsby at drigsby@nsba.org regarding further information needed for this request.

Thank you for your consideration.

Sincerely,



Thomas J. Gentzel
Executive Director and Chief Executive Officer

cc: Ms. Jessica Shahin
Associate Administrator
Supplemental Nutrition Assistance Program
Program Design Branch, Program Development Division
Food and Nutrition Service
U.S. Department of Agriculture

¹⁰ Mary Sell, "Change to SNAP would impact some Alabama students' access to free lunch," *Alabama Daily News*, October 31, 2019.