



Feeding Bodies. Fueling Minds.™

June 19, 2019

Ms. Nancy Potok
Chief Statistician
Office of Management and Budget
9257 New Executive Office Building
725 17th Street NW
Washington DC 20006

RE: Directive No. 14

Dear Ms. Potok:

On behalf of the 58,000 members of the School Nutrition Association (SNA), we appreciate the opportunity to provide comments on the *Request for Comment on the Consumer Inflation Measures Produced by Federal Statistical Agencies* published in the *Federal Register* on May 7, 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.

The annual poverty guidelines released by the Department of Health and Human Services (HHS) form the basis for program eligibility and/or benefits for many programs across federal agencies including, health care, nutrition, and other basic assistance programs. The US Department of Agriculture (USDA) establishes income eligibility guidelines for free and reduced-price school meal benefits by multiplying the annual Federal income poverty guidelines by a percentage set by statute. The proposed change would increase the income-eligibility thresholds for these programs over time, reducing the number of families that can benefit from these critical nutrition programs.

SNA is very concerned that this proposed change will result in children going hungry during the school day. Eligibility criteria for free and reduced-price meals through the National School Lunch and School Breakfast Programs would be changed and students who currently rely on the benefits of these programs would go hungry.

Income eligibility guidelines for free and reduced-price meals are set at a level that is inadequate to address families' needs. For example, based on 2018-2019 Income Eligibility Guidelines, a household of four would not qualify for free meals if their income exceeds \$32,630 for free meals or \$46,435 for reduced-price meal benefits. Throughout the country, school districts have denied benefits to needy families seeking assistance because the household income is slightly above the set guidelines. Excluding those families who have a financial need but narrowly miss eligibility under the income guidelines has dramatically increased unpaid meal debt over the past few years.

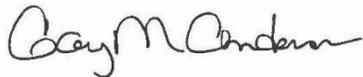
Students are also found eligible for school meal benefits through the direct certification process, which uses data sharing with SNAP and Medicaid programs to streamline eligibility determinations. This

proposed change would also reduce the number of families eligible for those programs, and though many students impacted might remain eligible for school meal benefits the increased barriers would depress participation.

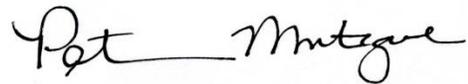
The Child Nutrition Program reimbursement rates and the USDA Foods rate provide critical revenue to cover the expenses of operating a school nutrition program. As identified in the recent [USDA School Nutrition and Meal Cost Study](#), the current costs for school meals is not completely covered by the Federal reimbursement. If eligibility guidelines were to change, the unpaid meal debt situation would likely escalate, further threatening financial sustainability of school nutrition programs, negatively impacting education funding overall and expanding child hunger. Local educational agencies as well as other community-based organizations operating these programs in vulnerable communities may look at the increased administrative burdens and costs and no longer find these critical programs viable to operate. This could impact services in remote and difficult locations where services are already minimal or even non-existent.

We appreciate the opportunity to comment. Hunger in America is a real issue and no action should be taken that would negate the efforts and services of child nutrition programs.

Sincerely,



Gay Anderson, SNS
President



Patricia Montague, CAE
Chief Executive Officer