



Feeding Bodies. Fueling Minds.™

December 10, 2018

Samantha Deshommies
Chief
Regulatory Coordination Division
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Avenue NW
Washington, DC 20529-2140

RE: DHS Docket No. USCIS-2010-
0012

Dear Ms. Deshommies:

On behalf of the 58,000 members of the School Nutrition Association (SNA), we appreciate the opportunity to provide comments on the proposed rule, *Inadmissibility on Public Charge Grounds*, published in the Federal Register of October 10, 2018. 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.

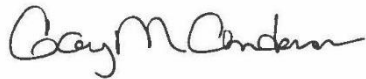
SNA is very concerned that this proposed rule change will result in children going hungry during the school day, even though they are legally authorized and eligible to receive free or reduced priced school meals. Although benefits offered through the National School Lunch and School Breakfast Programs are not considered as part of this proposed rule, many students are directly certified for free or reduced price meals as a result of their families' participation in the Supplemental Nutrition Assistance Program (SNAP). If SNAP benefits are considered in public charge determinations, many immigrant families, afraid to risk their immigration status, will drop out of SNAP, effectively compromising their students' meal status. Fear and confusion surrounding this complex rule change will deter these families from submitting free or reduced price school meal applications. Children eligible for benefits will simply go without school meals. SNA has already received anecdotal reports from school nutrition professionals serving communities with large immigrant populations that families are increasingly hesitant to apply for these critical benefits.

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.

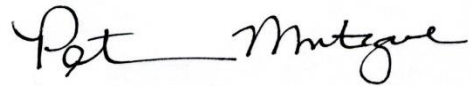
With this knowledge, schools have worked hard for decades to increase participation in school meal programs - we cannot afford to compromise this progress. Therefore, SNA opposes this proposed rule change.

Thank you for your consideration.

Sincerely,



Gay Anderson, SNS
President



Patricia Montague, CAE
Chief Executive Officer