

May 8, 2023

School Meals Policy Division
Food and Nutrition Service
P.O. Box 9233
Reston, Virginia 20195

Re: Proposed Rule — Child Nutrition Programs: Community Eligibility Provision — Increasing Options for Schools

On behalf of the National Parent Teacher Association and our millions of members nationwide, we appreciate the opportunity to comment on the U.S. Department of Agriculture’s proposed rule, “Child Nutrition Programs: Community Eligibility Provision — Increasing Options for Schools” (88 FR 17406).

PTA is the oldest and largest child advocacy association in America, comprised of millions of parents, teachers, grandparents, caregivers, foster parents and other caring adults who share a commitment to improving the education, health and safety of all children. Our association recognizes that proper nutrition is imperative to the health, development and academic achievement of children, and we know that healthy children learn better and are more productive—both in and out of the classroom.

The USDA Community Eligibility Provision (CEP) enables high poverty schools and school divisions to offer free breakfast and lunch to all students in a qualifying school. Additionally, the CEP program eliminates the unintended consequence of school meal debt, reduces paperwork, and streamlines school meal operations by eliminating the need to collect and process school meal applications and school meal payment. Not only do these factors result in decreased burden for school administrators, it also decreases the burden on individual families and eliminates a significant barrier to access that successfully completing a school meal application can create. Our association has advocated for providing all states with the option to opt into statewide community eligibility, lowering the eligibility threshold from 40% identified students to 25% identified students, and raising the multiplier for federal reimbursement from 1.6 to 2.5.

The proposed rule lowering CEP’s eligibility threshold to 25% Individual Student Percentage (ISP) will have a positive impact on schools and communities, creating the opportunity for an additional 9 million students to have access to free school meals and increasing operational efficiencies for 20,000 more schools. As such, our association urges USDA to give states the

option to implement the 25% threshold even if the new rule is finalized after the June 30th election deadline. This will allow states and schools to benefit from the change in the upcoming 2023-2024 school year.

While expanded CEP eligibility is imperative in the fight against child hunger, districts must ensure CEP is a financially viable option for school food services. Despite an abundance of technical assistance, many schools struggle to adopt CEP at lower ISP levels with the current 1.6 multiplier.

Over the last year, states have enacted legislation ensuring all students have access to healthy school meals. Currently five states, California, Maine, Colorado, Minnesota, and New Mexico, passed policies supporting schools' efforts to offer free meals to all students. State funding will encourage schools with lower ISPs to adopt CEP; however, concern remains for newly eligible schools that lack financial support. In order to further support states that have taken this important step, USDA should approve waivers from states to operate CEP statewide and explore creating statewide CEP demonstration projects to evaluate the approach.

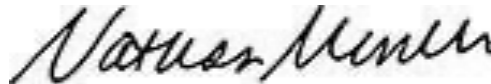
USDA's 2019 School Nutrition and Meal Cost Study shows that districts spend more to produce a school meal than they are reimbursed. Any administrative savings generated by CEP allows school nutrition departments to combat rising food prices, improve the nutritional quality of meals served, expand nutrition education and farm to school initiatives, and invest in operations that ensure long term program viability.

Our association appreciates the opportunity to provide comments on "Child Nutrition Programs: Community Eligibility Provision — Increasing Options for Schools," and we look forward to continuing to support ongoing work at the local, state, and national levels to enhance the nutritional health of our nation's children and families. If you have any questions or would like additional information, please feel free to contact Kate Clabaugh, National PTA Director of Government Affairs, at kclabaugh@pta.org.

Sincerely,



Anna King
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