



ASSOCIATION OF
SCHOOL BUSINESS OFFICIALS
INTERNATIONAL

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

Re: FNS Docket No. FNS 2022-0044, RIN 0584-AE93, Child Nutrition Programs: Community Eligibility Provision-Increasing Options for Schools

Dear Ms. Frey,

On behalf of AASA, The School Superintendents Association, representing more than 10,000 public school superintendents, and The Association of School Business Officials International (ASBO), representing more than 8,000 school business professionals—we write to offer comments in support of Child Nutrition Programs: Community Eligibility Provision-Increasing Options for Schools.

Expanding access to CEP has been a longtime priority for AASA and ASBO as a program that feeds more students at no cost to them with less unnecessary paperwork. CEP increases school meal participation, helps eliminate stigma, reduces administrative burdens, and streamlines food service operations, making it a win for students, families, and districts. Additionally, CEP eliminates the issue of unpaid meal debt, which has amassed for schools since the return to the Free and Reduced-Price Lunch model following two years of universal school meals during the COVID-19 pandemic. **We commend USDA for its work to increase participation in the Community Eligibility Provision (CEP) and ensure that all students have access to the meals they need to learn and grow.**

Although the proposed rule lowering the eligibility threshold to 25 Identified Student Percentage (ISP) will allow more school districts to participate, it is important to note that many will continue to face financial barriers to participation without a concurrent increase to the multiplier. Participating in CEP and providing free meals to all means districts lose revenue from students who would have usually paid for meals. Without a higher multiplier providing more federal financial support, many districts cannot afford to lose that stream of funding. The current 1.6 multiplier already fails to provide sufficient financial support to many districts who are eligible to participate at 40 ISP. We understand that only Congress can change the multiplier, but we encourage USDA to explore every opportunity to make CEP financially viable for all eligible schools.

Finally, we would be remiss not to acknowledge the impact expanding CEP has on the availability of Free and Reduced-Price Lunch (FRPL) data. A highlight of CEP is eliminating the need for districts to collect forms from families, however that also means that we will lose access to a poverty measure that is relied upon by districts, states and researchers across the country. It is critical that USDA partners with other departments to assess alternatives to FRPL data that are reliable, accurate and do not place the burden of collection on school districts.

Thank you for the opportunity to provide comments on this important issue. We look forward to continuing our collaboration with USDA to ensure all students have the meals they need to come to class ready to learn and reach their full potential.

Tara Thomas
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AASA

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Director of Advocacy
ASBO International