



September 11, 2019

Mr. Brandon Lipps
Deputy Undersecretary
Food, Nutrition, and Consumer Services
United States Department of Agriculture
3101 Park Center Drive
Alexandria, VA 22302.

Re: Docket ID Number [FNS-2018-0037], “Revision of Categorical Eligibility in the Supplemental Nutrition Assistance”

Dear Deputy Undersecretary Lipps:

The Association of California School Administrators represents more than 17,000 school leaders and the California School Boards Association serves more than 5,000 locally elected school board members. Our organizations formed the ACSA-CSBA Federal Partnership to educate federal policymakers about our school districts’ local efforts to improve developmental and educational outcomes for California students. This vitally important work includes meeting students’ nutritional needs so that they can focus on learning and prepare for academic and workforce success.

The ACSA-CSBA Partnership strongly opposes the Food and Nutrition Service’s (“FNS”) proposal to change the Supplemental Nutrition Assistance Program’s (“SNAP”) categorical eligibility structure. FNS’s plans to (1) define “benefits” for categorical eligibility to mean ongoing and substantial benefits; and (2) limit the types of non-cash TANF benefits conferring categorical eligibility to those that focus on subsidized employment, work supports, and childcare. These changes will improperly take benefits away from hungry students and increase administrative burdens on school districts. The proposed change will also have a negative cascading effect on other federal programs, such as the major formula programs of the Every Student Succeeds Act, which use the free and reduced school lunch measures to allocate resources designed to promote educational equity.

Over six million Californians, including over two million children, lack consistent access to the quality and quantity of food required for healthy living. Insufficient nutrition negatively impacts students' physical, social, and mental health outcomes and it makes schools' efforts to educate all students profoundly more difficult. Focusing the program's categorical eligibility system on a narrower population will harm highly food insecure students, students with families constantly struggling on the cusp of severe poverty, and even food secure students trying to learn in classrooms with students whose basic needs are not being met.

Perversely, the proposed change will not create efficiency improvements or better protections against abuse, but will instead increase administrative burdens on school districts, including limiting successful initiatives like the Community Eligibility Provision, which are shown to increase school attendance and school meal participation.

The proposed changes will impact a very large number of California students and their families and institute new, unnecessary bureaucratic burdens on nearly every school district in our state. During the 2018-2019 school year, 2.5 million California students were directly certified to receive free school meals based on their family's SNAP eligibility. These learners reside in communities all across the state and thus we expect most school districts will immediately be forced to find new ways to nourish many of them, so that they and their peers can focus on learning. We encourage you to abandon this idea and instead work with communities to ensure that federal nutrition programs are better serving those in need, rather than making it harder for them to receive services.

Sincerely,



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