

**FAX COVER SHEET**

TO	Nora Kincaid
COMPANY	Bureau of Labor Statistics
FAX NUMBER	12026915111
FROM	Nadia Davis
DATE	2020-04-06 14:48:32 GMT
RE	Comments: Consumer Price Index Commodities and Services Survey

COVER MESSAGE

Please see attached comments from the School Nutrition Association in response to Federal Register Notice, Document Number -03504



Feeding Bodies. Fueling Minds.™

April 2, 2020

Ms. Nora Kincaid, BLS Clearance Officer
Division of Management Systems
Bureau of Labor Statistics, Room 4080
2 Massachusetts Avenue, NE
Washington, DC 20212

Dear Ms. Kincaid:

On behalf of the 55,000 members of the School Nutrition Association (SNA), we appreciate the opportunity to provide comments on the Department of Labor, Bureau of Labor Statistics Information Collection Activities; Comment Request published in the *Federal Register* on February 21, 2020.

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. As noted in the notice, the Consumer Price Index (CPI) is used by the U.S. Department of Agriculture (USDA) to establish income eligibility guidelines and levels of support for free and reduced price school meal benefits, program reimbursement rates (National Average Payments) and USDA Foods support rate.

Although the notice says that the Department of Labor is not seeking comments on the impact of the change, it is important to look at the indirect impact of the CPI. The data collection is needed to determine the variable costs and impacts across the states and territories. Support offered through the National School Lunch and School Breakfast Programs is directly impacted by income eligibility levels and national average payments. Any changes in calculation need to take into consideration the broad impact and the programs that conduct direct certification through other means tested programs.

Throughout the country, school districts have denied benefits to families seeking assistance because the household income is slightly above the set guidelines. As a result, many of these families may have become part of the national unpaid meals debt problem and unfortunately students as young as first grade may have been 'lunch shamed.' As part of the direct certification process, using data sharing with SNAP and Medicaid programs, eligibility and benefit determinations have been streamlined. And, through direct certification, students have received nutritional benefits through their participation as a result of these important programs.

Income eligibility guidelines for free and reduced price meals are set at a level that is less than what families need to address their needs. For example, based on 2019-2020 Income Eligibility Guidelines, a household of four that exceeds a **gross** income of \$33,475 for free meals or \$47,638 for reduced price meals is not eligible for meal benefits. Lowering or slowing the indexes, could result in higher numbers

of individuals suffering from hunger in America. At this time, when so many households are struggling to make ends meet, perhaps an adjustment should be implemented.

The child nutrition program reimbursement rates and the USDA Foods rate, based on the CPI for Foods Away from Home, provide revenue to school nutrition programs in school districts across the country to pay for the expenses associated with serving meals to children and others. As identified in the recent USDA School Nutrition and Meal Cost Study, the costs for school meals is not completely covered. Even with school districts picking up the loss noted in the report, over time if eligibility guidelines were to change the unpaid meals debt situation would likely not improve and hunger issues would expand.

We appreciate the opportunity to comment. Hunger in America is a real issue and we respectfully request that you consider not taking any action that would negate the efforts and services of child nutrition programs.

Sincerely,



Gay Anderson, SNS
President



Patricia Montague, CAE
Chief Executive Officer