



Feeding Bodies. Fueling Minds.™

May 30, 2023

Ms. Nora Kincaid
BLS Clearance Officer
Division of Management Systems
Bureau of Labor Statistics, Room G225
2 Massachusetts Avenue NE
Washington, DC 20212

Dear Ms. Kincaid:

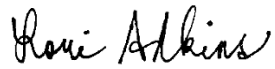
On behalf of the 50,000 members of the School Nutrition Association (SNA), we welcome this opportunity to provide comments on the Bureau of Labor Statistics *Information Collection Activities; Comment Request* published in the *Federal Register* of April 3, 2023. As noted, this is a notice to gather comments on the Consumer Price Index (CPI) that the Bureau of Labor Statistics calculates. Our membership includes 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. Our membership directly services the school population, primarily children and adolescents, ages 2-18 years old.

As noted, the CPI is the only index compiled by the U.S. Government designed to measure changes in the purchasing power of the urban consumer's dollar. The CPI is a measure of the average change in prices over time paid by urban consumers for a market basket of goods and services. Changes in the CPI affect the cost of school breakfasts and lunches for over 30 million children who eat school meals each day as part of the National School Lunch Program (NSLP) and School Breakfast Program (SBP). Under the National School Lunch Act and Child Nutrition Act, national average payments as reimbursements for those lunches and breakfasts are adjusted annually by the Secretary of Agriculture based on the change in the CPI series, *Food away from Home*. This calculation impacts the funding to school districts across the country.

Accuracy and prompt availability of the annual updated CPI and USDA's school meal reimbursement rates are critically important for Local Education Agencies (LEA's) to establish pricing for the new school year and manage budgets. The recent inflationary and supply chain factors have made it extremely difficult for LEAs to maintain fiscal solvency. Therefore, consideration should be given to looking at the formula applied for calculating the annual school meal national average reimbursement rates.

Thank you for this opportunity to comment on this notice. Our Association would be pleased to discuss this further as appropriate.

Sincerely,

Handwritten signature of Lori Adkins in black ink.

Lori Adkins, MS, SNS, CHE
President

Handwritten signature of Patricia Montague in black ink.

Patricia Montague, CAE
Chief Executive Officer