

May 2, 2023

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

**Re: Document ID FNS-2023-05624: Child Nutrition Programs: Community Eligibility Provision-
Increasing Options for Schools**

Dear Madams and Sirs:

As two of the co-chairs of the Bipartisan Policy Center's Food and Nutrition Security Task Force (task force), we are writing to strongly support the U.S. Department of Agriculture's (USDA) proposed rule to expand access to the Community Eligibility Provision (CEP) by lowering the minimum identified student percentage (ISP) participation threshold from 40 percent to 25 percent. Established in 2021, the BPC's task force provides federal policy recommendations to improve food security and nutrition security through the federal nutrition programs. Its diverse membership included bipartisan experts in nutrition science and policy, food systems, public health, health care, the charitable food sector, food industry and retail, and more.

In our 2022 policy brief, [Strengthening the Child Nutrition Programs](#), the task force recommended a series of proposals aimed at improving food and nutrition security through the provision of nutritious food in schools, including ensuring that all children, regardless of household income, have access to nutritious foods to allow them to learn and grow by providing school breakfast, school lunch, afterschool meals, and summer meals to all students at no cost. Providing school meals to all students at no cost, also known as universal school meals, can improve the health and nutrition of children, promote equity, and provide economic benefits to society at large.

Recognizing that it may be prudent to develop stepwise policies to assist policymakers in incrementally achieving these goals, the task force further enumerated a series of policy options, including lowering the threshold for CEP eligibility and increasing the federal reimbursement multiplier for CEP schools. Your proposed rule would lower the CEP eligibility threshold from the current 40 percent to 25 percent.

If implemented, the lowered CEP ISP threshold would give more schools and local educational agencies (LEAs) the opportunity to participate in CEP, allowing more students to access meals at no cost, reducing paperwork for staff and families at LEAs, and eliminating unpaid meal charges and stigma associated with free school meal participation. According to USDA estimates, 337 additional LEA would elect CEP if the proposed rule were implemented.

However, to make CEP financially viable for LEAs with a lower ISP, federal reimbursements often need to be supplemented with additional non-federal funds, which may not be available in some communities. As recommended by our Task Force, your proposal would further be strengthened by working with Congress to increase the federal reimbursement multiplier for CEP schools above the current statutory maximum of 1.6. When combined, these policy changes would support the Biden Administration in reaching its goal of expanding free school meals to 9 million more children.

Thank you for your consideration.

Sincerely,



Dan Glickman
Former Secretary
U.S. Department of Agriculture
Bipartisan Policy Center
Co-Chair
BPC Food and Nutrition Security Task Force



Ann M. Veneman
Former Secretary
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