



September 23, 2019

Program Design Branch  
Program Development Division  
Food and Nutrition Service, USDA  
3101 Park Center Drive  
Alexandria, VA 22302

**Re.: Docket No. FNS-2018-0037 for “Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP)”**

To Whom It May Concern:

On behalf of United Fresh Produce Association, which represents companies across the full fresh produce supply chain, we wish to communicate our concerns with the proposed rule issued by United States Department of Agriculture (USDA), Food and Nutrition Service (FNS), to revise categorical eligibility. Our association is deeply committed to ensuring that all Americans have access to safe and healthy fresh fruits and vegetables, and we work to eliminate barriers in doing so, be it within the supply chain or through policy.

Particularly concerning about the proposed rule is the report that up to 500,000 students could lose eligibility to free school breakfasts and lunch. USDA has made remarkable progress over the last decade by aligning school meals with Dietary Guidelines for Americans’ recommendations. With nearly 20 percent of the nation’s youth obese – this progress matters. Whether you are a child in a family with means, or one in a family struggling through difficult financial times, school meals provide an equal playing field where all students can receive the nutrition they need and deserve. Establishing policies that make it harder for students to receive meals is a disservice to our nation’s most vulnerable students and an unnecessary burden from the federal government on local schools.

School districts work incredibly hard to serve meals, including taking on the often labor-intensive process of collecting and processing free and reduced-price meal applications. Automatically enrolling low-income students in free meals through categorical eligibility eases some of the burden for schools in processing applications and allows schools to focus on what they want to do: feed kids appetizing and nutritious foods. Furthermore, the popular Community Eligibility Provision option (CEP) would be unduly hurt by this proposal. And at a time when unpaid meal charges are saddling nearly every public school with the moral and financial challenge of addressing the problem – we should be doing more to ensure students have meal coverage, not less.

We are also concerned about the impact that this rule could have on these very same students and their families at home – with the estimates that more than 3 million enrollees could lose their Supplemental Nutrition Assistance Program (SNAP) benefits. Similar changes were debated during the 2018 Farm Bill and were rejected by both parties in Congress. Instead, we should be focusing on how to ensure this

vulnerable population has access to nutritious foods, given SNAP is one of the last remaining feeding programs to not be aligned with the DGA.

United Fresh Produce Association and our members remain committed to ensuring all Americans, and especially children, have access to a nutritious food supply, including fresh fruits and vegetables. We appreciate the opportunity for comment and strongly encourage USDA to maintain the broad-based categorical eligibility option, providing states and local communities the flexibility to determine how to best serve their populations.

Sincerely,

A handwritten signature in blue ink that reads "Mollie E Van Lieu". The signature is written in a cursive style and is positioned above the typed name.

Mollie Van Lieu  
Senior Director, Nutrition Policy  
United Fresh Produce Association