



School of Human Ecology  
UNIVERSITY OF WISCONSIN-MADISON

September 19, 2019

Jennifer Gaddis  
Assistant Professor of Civil Society & Community Studies  
University of Wisconsin-Madison  
4251 Nancy Nicholas Hall  
1300 Linden Drive  
Madison, WI 53706

RE: USDA Food and Nutrition Service, Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP)

Dear U.S. Department of Agriculture,

My name is Jennifer Gaddis and I am an assistant professor at the University of Wisconsin-Madison and the author of the forthcoming book *The Labor of Lunch: Why We Need Real Food and Real Jobs in American Public Schools* (University of California Press, Nov. 2019). I am submitting public comment in my capacity as a researcher with specialized expertise in school nutrition programs, sustainable food systems, and low-wage workers. Since 2011, I have conducted research in rural, suburban, small town, and urban school districts across the country and have witnessed firsthand the challenges that low-income families and school foodservice staff face when children are denied free and reduced-price lunches. Under the USDA's proposed rule change, fewer families will automatically qualify for SNAP benefits, which means fewer children will automatically qualify for free/reduced-price school meals. This change will make it more challenging for hundreds of thousands of individual families to navigate the process of applying for free and reduced-price lunches. *The New York Times* estimates that 500,000 children would lose their automatic eligibility for free/reduced-price school meals.

This proposed legislation stands to negatively affect the "near poor" the most. The near poor include the children of families whose households earn gross incomes between 185 percent and 200 percent of the poverty line who would no longer be automatically eligible for any food assistance at school. Paying \$2-3 per school lunch is out of reach for many of these families, which means their children will opt out of the National School Lunch Program (NSLP) and join the roughly 20 million children who currently opt out of the program. Likewise, while children in poorer households with gross incomes between 130 percent and 185 percent of the poverty line will remain eligible for reduced-price lunches, even the relatively low cost (40 cents per

lunch) can push school meals out of reach for some low-income families, especially those with multiple school-aged children.

Notably, these children are disproportionately the targets of “[lunch shaming](#)” since their caretakers often face precarious economic situations that result in “[lunch debt](#)” as their monthly finances change. In order to maximize the public value of the NSLP as a tool for promoting public health, academic achievement, and local food and farm economies (through farm-to-school programs), we need to create policies that bring more children into the cafeteria instead of driving them away simply because their parents cannot afford to pay.

Even more importantly, the proposed rule change would jeopardize the progress toward universal free meals that has been made via the Community Eligibility Provision of the Healthy, Hunger-Free Kids Act of 2010. Schools with at least 40% of students whose free meal eligibility is directly certified through household participation in SNAP or other federal anti-poverty programs are allowed to provide free meals to all students in the school instead of charging them varying prices based on their household income level. At the local level, the proposed SNAP rule change could have the unintended consequence of causing schools to drop below the direct certification threshold for community eligibility. This would undo the work that schools and communities have done to make their cafeterias more inclusive and eliminate the added revenue/economies of scale that school foodservice directors rely on to make improvements to their child nutrition programs. Put simply, my research suggests that the proposed rule change would not only hurt individual poor and near-poor children who may go hungry or be “lunch shamed,” but also wreak havoc on the promising developments some districts have been able to drive forward in their local food systems through community eligibility.

Lastly, it is worth remembering that when the NSLP was first created in 1946, Congress articulated two objectives for the program, one of which is to “safeguard the health and well-being” of the nation’s children and the other of which is to support the domestic consumption of nutritious foods and agricultural commodities. The USDA must consider the multiple unintended consequences that this proposed rule change would have to the NSLP and other school nutrition programs. Lower participation in the NSLP (both at the local level and at the national level) means fewer public dollars to devote to improving public health (which will reduce the long-term healthcare costs incurred by the federal government) and fewer dollars to devote to farm-to-school programs (which support the type of localized food and farm economies that are so vital to rural America and to the resilience of our nation’s agricultural sector). If the USDA proceeds with this rule change, the school meal eligibility standards and community eligibility threshold should, at the very least, be adjusted to accommodate the losses to direct certification that would be incurred. Better yet, the USDA should not proceed with the proposed rule change.

Sincerely,

Jennifer Gaddis, PhD

A handwritten signature in black ink that reads "Jennifer Gaddis". The signature is written in a cursive, slightly slanted style.