



University of California
Agriculture and Natural Resources

Nutrition Policy Institute

Friday, November 1, 2019

Food and Nutrition Services
U.S. Department of Agriculture
3101 Park Center Drive
Alexandria, Virginia 22302

Re : Docket ID Number [FNS-2018-0037], Revision of Categorical Eligibility in the Supplemental Nutrition Assistance Program (SNAP)

To Whom It May Concern:

The Nutrition Policy Institute at the University of California submits this Comment **in strong opposition to the U.S. Department of Agriculture's (USDA) proposed rule (Docket No. FNS-2018-0037) that would revise the definition of categorical eligibility in the Supplemental Nutrition Assistance Program (SNAP).**

For nearly two decades, the Nutrition Policy Institute (NPI) and its predecessor Center for Weight and Health have engaged in research to strengthen nutrition programs and policy in California and the United States. NPI's principal focus is on the federal food programs, both because of their broad reach and their narrow targeting of the nutritionally most vulnerable populations. Because the literature is clear that, particularly with regard to diet-related health conditions, prevention is more effective than treatment, NPI accords priority in its research and evaluation to policies and practices affecting young children for whom the federal childcare and school meal programs might provide valuable nutrition support.

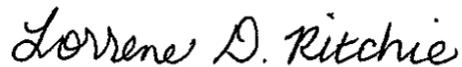
An abundance of scientific literature details the manifold benefits of the school meal programs, including:

- Improved dietary intake
- Less food insecurity
- Steadier school attendance
- Fewer visits to the school nurse
- Improved academic behavior

Additionally, thirty-seven percent of the University of California's students come from low-income households. (In fact, more than 40 percent of current UC students report that they experience food insecurity.) Thus, the University has a special interest in seeing that these potential candidates for admission are as well prepared as possible. As school meal participation positively impacts students' nutrition, health, and academic performance, any proposed impediment to participation in the school meal programs is counterproductive to the students', the university's, and the state and nation's best interests.

As USDA has noted, the proposed limitations to broad-based categorical eligibility to SNAP will eliminate close to one million school children from direct certification for free school meals. Not only will automatic enrollment be lost for these students, leaving them in the vagaries of the individual application process, but some schools and entire school districts may be forced to drop out of the community eligibility provision, thus jeopardizing school meal participation for still more students. In short, the proposed rule is not consistent with many years of bipartisan, evidence-based policy approaches to encourage participation of low-income and other students in the school meal programs. For this reason, Nutrition Policy Institute urges USDA to withdraw the proposed rule.

Sincerely,



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