



Michelle Frey
Branch Chief, Policy Design Branch, School Meals Policy Division
4th Floor Food and Nutrition Service
1320 Braddock Place
Alexandria, VA 22314

Re: FNS Docket No. FNS 2022-0044, RIN 0584-AE93, Child Nutrition Programs, Options for Schools

Dear Ms. Frey,

On behalf of AASA, The School Superintendents Association, public school superintendents, and The Association of School Business Officials International, we support the proposed rule for Options for Schools.

Expanding access to CEP has been a longtime priority for AASA. CEP feeds more students at no cost to them with less unnecessary paperwork, increases school meal participation, helps eliminate stigma, reduces administrative burden, streamlines food service operations, making it a win for students, schools, and taxpayers. Additionally, CEP eliminates the issue of unpaid meal debt, which was a significant barrier to school meals during the COVID-19 pandemic. **We commend USDA for its commitment to ensure all students have access to the meals they need to learn and grow.**

Although the proposed rule lowering the eligibility threshold to 25% of students in poverty (ISP) will allow more school districts to participate, it is important to ensure that schools do not face financial barriers to participation without a concurrent increase in federal funding. Participating in CEP and providing free meals to all means districts will lose revenue from students who would have usually paid for meals. Without a higher multiplier to offset this loss, many districts cannot afford to lose that stream of revenue. The current multiplier already fails to provide sufficient financial support to make participation at 40 ISP. We understand that only Congress can change the multiplier, but we encourage USDA to explore every opportunity to make CEP financially viable for all schools.

Finally, we would be remiss

