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MEMORANDUM

To: United States Department of Agriculture
School Meals Policy Division, Food and Nutrition Service
P.O. Box 9233, Reston, VA 20195

From: Vermont House Committee on Education

Date: May 4, 2023

Subject: Child Nutrition Programs: Community Eligibility Provision (CEP) -
Increasing Options for Schools

To Whom it May Concern,

The Vermont House Committee on Education appreciates the opportunity to comment on the USDA's proposed rule change "*Child Nutrition Programs: Community Eligibility Provision-Increasing Options for Schools*" for CEP program expansion to make it more accessible to schools across the country.

We support the USDA's proposal to expand the Community Eligibility Provision (CEP) by lowering the threshold of low-income students required for participation in the program from 40% to 25% because...

- More schools would be able to qualify for participation in CEP
 - Vermont has seen many schools participate in CEP with lower ISPs (Identified Student Percentage), but we have also seen schools fall just short of meeting the 40% threshold and very narrowly lose eligibility for the program.
 - This especially helps our many small and rural schools, who serve many critical roles for isolated rural communities and often struggle with higher per-plate administrative costs because of their size.
- Vermont's legislature is preparing to pass H.165, a bill that will require all Vermont public schools to permanently provide universal school meals, and to use either CEP or Provision 2 to do so. Because CEP is far more simple to operate and administer, increasing the number of schools eligible to use CEP will improve program integrity and reduce the administrative burden on Vermont's Agency of Education, the State Agency that administers all of the federal Child Nutrition Programs in Vermont.

- Community Eligibility Provision is the most effective and sustainable way for schools to provide free meals to all students.
 - CEP streamlines school meals. It significantly reduces administrative overhead associated with collecting and verifying school meal applications.
 - In CEP, a greater share of each meal reimbursement is spent on food and direct labor costs to produce meals.
 - This supports expanded scratch cooking and frees up more money for schools to spend on local and fresh foods.
- Many children who qualify for free and reduced price school meals do not take them because of stigma or shame associated with receiving free meals. With CEP, we can eliminate stigma for kids in the cafeteria.
- Many families who qualify are not approved for free meals because they did not or were not able to submit a school meal application, or because literacy or language barriers caused them to fill out the form incorrectly. With CEP, language barriers and other confusion do not prevent eligible children from eating free meals at school.
 - Prior to the implementation of universal school meals in 2020, 4,000 eligible students in Vermont (11% of all low income public school students) were never signed up for the free school meals they needed.