



Opposition Written Testimony-Proposed SB Requiring Household Gross Income Verification  
Senate Committee on Government Efficiency  
Senator Renee Erickson, Chair

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Chair Erickson and members of the Committee:

Thank you for the opportunity to provide written testimony in opposition to this proposal. We appreciate the Committee's focus on government efficiency, accurate records, and accountability in publicly funded programs. Program integrity within the National School Lunch Program (NSLP), as well as appropriate State At-Risk funding, is a shared priority. However, we respectfully oppose requiring school districts to verify the household gross earned income of every student approved for free meals.

Federal regulations already require districts to verify a minimum of 3% of approved free and reduced applications annually. Even at that level, verification is a substantial administrative process. In our district alone, minus directly certified students, for the 2025-26 school year, we processed over 6,000 free/reduced meal applications. Verifying 3% of that number of applicants requires the review of almost 180 applications each year (equaling 300 students). Each case involves multiple notices, documentation review, follow-up communication, strict federal timelines, and confidentiality safeguards. This is a structured audit process — not a simple data match.

Expanding verification to 100% of free applications would increase our workload more than **twenty-fold**, from roughly 180 cases to over **4,000** annually. Such an expansion would require significant additional staffing, system capacity, and training. These costs would be borne locally, as this requirement exceeds federal NSLP mandates. The fiscal impact would likely outweigh any potential savings from identifying ineligible applicants, particularly given that the current federal verification system already targets error prevention through a statistically valid sampling model.

Beyond Wichita's projected increased costs of \$180,000+, universal verification introduces measurable program risks:

- **Reduced participation.** Research consistently shows that increased documentation requirements reduce participation among eligible households. Families with fluctuating incomes, language barriers, or unstable housing are less likely to complete more burdensome verification processes, resulting in eligible students not accessing benefits.
- **Administrative error risk.** Scaling verification from 3% to 100% increases the volume of sensitive financial documentation handled by districts, raising the likelihood of processing errors and confidentiality concerns.
- **Diminished program efficiency.** A system that increases administrative workload while discouraging eligible participation reduces overall program effectiveness and shifts resources away from instructional priorities.

The current federal verification framework was intentionally designed to balance accountability with administrative feasibility. Kansas districts already comply with stringent federal oversight requirements which are monitored and reviewed annually.

School nutrition programs exist to support student readiness to learn. Expanding verification beyond federal standards would exponentially increase local costs and administrative burden without clear evidence of commensurate benefit. For these reasons, we respectfully urge the Committee to maintain the existing federally mandated verification framework.