

## **Written Testimony in Opposition to the Bill Senate Committee on Government Efficiency**

Chair and Members of the Committee,

Thank you for the opportunity to submit testimony regarding this bill.

I am a School Food Service Director in Kansas, and I am writing to share concerns based on my direct experience administering the National School Lunch Program in a small school district. While I understand the goal of accountability, this proposal would create a significant and unfunded administrative burden without improving program integrity.

Under current federal guidelines, districts are required to verify only a small, statistically valid sample of applications. This approach is designed to ensure accuracy while remaining feasible for school districts to administer. Requiring verification of 100% of applications represents a major departure from this long-standing federal policy.

In our district alone, fully verifying every application would require **more than 100 additional staff hours** each year and cost an estimated **\$3,000–\$4,000 in labor**. For a small district with limited staffing, that level of time and expense is significant. It's important to note that, based on the existing federally required verification process, **we did not identify any errors in the applications we reviewed last fall**, which demonstrates that the current system is already working as intended.

School nutrition programs are designed to be self-supporting and do not rely on local general fund dollars. It is becoming increasingly impossible to do this due to rising food and labor costs and stagnating reimbursement rates. Imposing another large, unfunded administrative mandate on these programs forces districts to redirect limited resources toward paperwork rather than meal service, student access, or operational efficiency. Ultimately, this creates pressure on districts without delivering measurable benefit.

Additionally, free and reduced-price meal data are used for purposes beyond meal eligibility, including Title I and at-risk funding calculations. Expanding verification to every application increases the likelihood of processing delays and errors, which can distort poverty data, disrupt funding allocations, and create audit risk for school districts.

Although we do not participate in the Community Eligibility Provision (CEP), I am also concerned about the provisions requiring legislative or Legislative Coordinating Council approval for participation in the Community Eligibility Provision. CEP is a federally authorized option with a rigorous approval process already administered by the Kansas State Department of Education under strict timelines. Adding another layer of approval does not enhance oversight, but it does introduce uncertainty and risk. Because CEP planning must occur months in advance, any delay or lack of timely approval can prevent districts from participating altogether, even when all eligibility requirements are met.

For these reasons, I respectfully urge the Committee to consider the real-world operational impacts of this proposal and to oppose provisions that introduce inefficiency, increased costs, and unnecessary administrative burden into school meal programs that are already closely regulated and effectively administered.

Thank you for your time and consideration.

Respectfully submitted,

**Laura Fails, SNS**  
Food Service Director  
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