



**Written-Only Opposition Testimony on Bill that addresses the National School Lunch Program by Dr. Anna Stubblefield, Superintendent of Schools
Kansas City, Kansas Public Schools USD 500
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January 27, 2026

Chair Erickson and Members of the Senate Education Committee,

Thank you for the opportunity to submit written testimony in opposition of the Bill that would require school districts to verify the household gross earned income of every student who qualifies for free meals under the National School Lunch Program (NSLP) and would require legislative authorization to receive certain federal assistance payments.

For decades, the free and reduced-price meal program has served as a critical safety net for students and families experiencing economic hardship. Extensive research demonstrates that access to school meals improves student health outcomes, reduces food insecurity, and supports academic success. When students' basic needs are met, schools are better able to fulfill their educational mission, and families are better positioned for long-term stability.

Kansas City, Kansas Public Schools serves a diverse student population, with more than 60 languages spoken across our district. Approximately 81 percent of our students qualify for free or reduced-price meals.

The National School Lunch Act (NSLA) includes clear protections for the confidentiality of income-based household information. These protections are foundational to the program and exist to prevent stigma and shame, encourage participation, and ensure legal compliance. Federal Child Nutrition Program regulations strictly limit disclosure for these reasons, and those safeguards should be preserved.

Federal regulations also intentionally limit income verification to a small, statistically valid sample of applications. This approach balances program integrity with administrative feasibility. Requiring universal verification would substantially increase administrative workload for school districts, diverting limited staff time and resources away from instruction and student services. This expanded burden would yield minimal additional benefit, as the program already relies on direct certification and data matching to ensure eligibility accuracy.

Further, this Bill would impose a significant unfunded mandate on school districts. Absorbing these costs at the local level would force districts to redirect resources from classrooms or essential student supports, contrary to both federal program design and legislative intent.

Finally, free and reduced-price meal data are used beyond meal eligibility, including in Title I and at-risk funding calculations. Expanding verification to 100 percent of applications increases the risk of documentation errors, processing delays, and inconsistent determinations. Even small

increases in error rates can distort poverty metrics, leading to inaccurate funding allocations, increased audit risk, corrective actions, and funding instability for schools serving high-need populations.

For these reasons, Kansas City, Kansas Public Schools respectfully urges the committee to oppose the Bill and to preserve the integrity, efficiency, and equity of the National School Lunch Program.

Thank you for your time and consideration.

A handwritten signature in blue ink, appearing to read "Dr. Anna Stubblefield".

Dr. Anna Stubblefield, Ed.D.
Superintendent of Schools
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