



## COMMENTS SUBMITTED TO USDA



Mr. Robert Eadie  
Chief, Policy and Program Development Branch  
Child Nutrition Division, FNS, USDA  
3101 Park Center Drive, Room 640  
Alexandria, VA 22302-1594

Dear Mr. Eadie:

The reauthorization of child nutrition programs represents a great opportunity to improve the effectiveness of these programs. Oregon's kids need stronger child nutrition programs in order to thrive physically and mentally, be able to learn in school and after-school programs, and grow up to reach their full potential. By ensuring all children have adequate food where they learn and play, we will be feeding our future.

### What's at stake for Oregon:

- More than 230,000 Oregon children are eligible for a free or reduced price school lunch, roughly 42 percent of all students.
- The School Breakfast Program serves more than 135,000, representing only 55 percent of those participating in the National School Lunch Program.
- The WIC Program serves more than 168,000 Oregonians.
- Child and Adult Care Food Programs serve more than 53,000 Oregonians.
- The Summer Food Service Program serves more than 44,000 Oregon children on an average day.
- Of those who eat emergency food distributed by Oregon Food Bank, 37 percent are children.
- Child nutrition programs represent a \$128.6 million annual federal investment in Oregon's youth.

### Opportunities:

- The growing current need and rising operating costs demand that new investments be made in these important nutrition programs
  - **Increase funding** so programs can adequately meet the nutritional needs of hungry children.
- Too many families struggling with food insecurity do not access federal nutrition programs.
  - **Expand access** to nutrition programs by revising eligibility criteria, so all hungry children have equal access to healthy food.
- Child nutrition meals and snacks need improvements to support healthy eating and prevent obesity.
  - **Improve the nutritional quality** of meals and snacks to support good eating habits and improve childhood health.
- Excessive paperwork is an obstacle to sponsor participation and effectiveness.
  - Enhance and **streamline administrative efficiency** to maximize accessibility to healthy food.

Thank you for your consideration of the enclosed 2009 Child Nutrition and WIC Reauthorization recommendations on behalf of Oregon Food Bank and the Oregon Hunger Relief Task Force.

**Key Themes**

Increase funding  
Expand access & participation  
Improve nutritional quality  
Streamline administrative efficiency

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## **Program Recommendation: Coordinate Child Nutrition Programs**

*The single greatest improvement to efficiency and administrative burden would be to streamline child nutrition programs*, aligning eligibility, application, training, reimbursement, meal pattern and service regulations. The most effective way of doing this is to combine features of the SFSP and the CACFP After School "At Risk" Meals and Snacks Program, to create a single comprehensive Community Child Nutrition Program. This would allow non-school sponsors to seamlessly serve children year-round, both in after school and summer enrichment settings. In addition, schools would benefit from combining the current NSLP Seamless Summer Option and NSLP Snack program to create a comprehensive NSLP Out of School Time Nutrition Program, which should also include the option of an after school supper. By taking the most effective practices from each of the current programs and coordinating the feeding of children year round, we will be able to maximize the number of sponsors and families participating in these important programs.

In the absence of a new comprehensive child nutrition program, key programmatic elements need to be aligned to reduce administrative complexity and red tape at the federal, state and local level.

Congress should:

- Use a consistent method of certifying eligibility across programs. For all programs utilizing area eligibility, lower the eligibility threshold to 40 percent to allow additional qualifying students to receive meals after school and in the summer.
  - Simplify the various reimbursement rates and structures.
  - Align monitoring requirements.
  - Allow sponsors to complete one application to operate all programs for which they are eligible.
  - Ease the administrative burden on organizations sponsoring multiple child nutrition programs.
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## **Program Recommendations:**

### **National School Lunch Program and School Breakfast Program**

#### **Improve access & expand participation**

Underutilization of both the National School Lunch Program (NSLP) and School Breakfast Program (SBP) is exacerbated by several issues: many families are unable to afford the reduced-price co-payment; state health insurance programs do not automatically qualify low-income children for NSLP and SBP; many food insecure families do not qualify because their household income exceeds the current eligibility cap; and, many students

arrive at school too late to eat breakfast in the cafeteria. In Oregon, about 42 percent of low-income students participate in the NSLP; only 55 percent of those students also consume breakfast at school. There are barriers to participation created by deficits in resources, applications, cafeteria operations and inattention to students' experience.

Congress should:

- Provide universal breakfasts and lunches for all students. At the very least, Congress should eliminate the reduced-price category and raise the eligibility ceiling to 200 percent of the Federal Poverty Level.
- Establish direct certification for all children receiving Medicaid and S-CHIP.
- Provide grants to operate in-classroom or other alternative-delivery breakfast programs.
- Provide grants for demonstration projects to increase participation at high schools. Support might be offered to districts that eliminate a la carte sales, close campuses or offer innovative service models, such as kiosks, carts or facility improvements.
- Encourage the development of local school district Wellness Councils to implement policies.
- Eliminate the requirement to collect social security numbers on school meal applications. Removing this unnecessary administrative burden will safeguard sensitive information and protect families identity from theft while allowing compliance with state law.

### **Improve nutritional quality**

Congress has mandated that schools must meet the dietary Guidelines for Americans, however this has not been accomplished. Furthermore, only 7 percent of schools met the School Meals Initiative (SMI) nutrition standards in a 2007 study. Nutritional quality of school lunches must be assured.

Congress should:

- Require the USDA to align the SMI standards with those of the Dietary Guidelines and ensure that future alignments occur immediately after new versions of the Guidelines are introduced.
- Support and expand Farm to School and school garden programs
- Allow schools to serve an after school supper, in addition to a snack, as part of their NSLP contract.

### **Streamline administrative efficiency**

- Require one food safety inspection per year for schools, or increase funding to cover a second inspection.

### **Increase funding**

Even before the food price spikes of 2008, many schools and most non-school operators of child nutrition programs struggled to produce and serve meals under the current reimbursement. Now, with many of the staples of school nutrition – dairy, produce, eggs – seeing exponential price increases, the federal reimbursement is woefully inadequate. Schools will receive a 4.27 percent increase in reimbursement during the 2008-09 school year, but this will not meet the increasing costs of food and labor.

Congress should:

- Set reimbursement at a more appropriate level for providing nutritious meals and link the higher rates to achieving targets articulated in the 2005 Dietary Guidelines for Americans.
- Establish a more nimble, responsive mechanism to adjust reimbursement rates that will account for sudden cost increases. Rates could be increased semi-annually and or regionally to reflect variations.
- Reimburse an extra serving of milk.
- Back-date school reimbursements to the date of an eligible students' application rather than the date of qualification, much like in the Food Stamp Program.

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## **Program Recommendations: Summer Food Service Program**

### **Improve access and expand participation**

Many low-income students live in neighborhoods that are ineligible to provide free meals to children through the Summer Food Service Program (SFSP). This is especially important for rural areas with pockets of poverty amid mixed-income communities. Currently only 26 percent of eligible children in Oregon participate in SFSP during the summer. More needs to be done to raise awareness of this important nutrition program for children and increase participation.

Congress should:

- Allow program sponsors to operate open summer lunch sites in areas with 40-49 percent free and reduced price eligibility.
- Provide federal matching dollars to states to work with community-based organizations on child nutrition outreach, similar to the current food stamp outreach program.
- Expand current regulations requiring sponsors to issue press releases, to include more effective outreach such as notification to eligible students and on-site signage.
- Create a Parent Meal pilot in Oregon, to allow sponsors in counties with low participation to feed parents of attending children during the summer.\*

\* A locally funded project in Oregon provided meals to parents at a limited number of SFSP sites. Results showed that more children participated when parents were also fed. It also increased fruit and vegetable consumption among the children, decreased waste, and led to better site supervision.

### **Improve nutritional quality**

Meal patterns for SFSP have not been updated since the program began more than thirty years ago. Mathematica's 2003 analysis confirmed that SFSP foods do not promote obesity prevention, nor conform to the 2005 Dietary Guidelines for Americans. The diversity of sites and food preparation methods complicate efforts to provide nourishing and appealing lunches and snacks.

Congress should:

- Require USDA to immediately update SFSP meal patterns to align with Dietary Guidelines.
- Base meal patterns on age since older children require more nutrition.
- Encourage sponsors to gather student and parent input into menus.
- Offer cash in lieu of commodities (similar to CACFP).
- Provide higher reimbursement tied to improved nutrition standards that meet or exceed targets outlined in the 2005 Dietary Guidelines for Americans.

### **Streamline administrative efficiency**

SFSP sponsors expend enormous resources on administrative functions – often instead of procuring higher-quality food or opening additional sites. The nationwide expansion of the Simplified Summer Program improved accounting practices, but significant reductions in administrative activities are still needed.

Congress should:

- Reduce the frequency of site monitoring requirements for sponsoring organizations with high compliance. Currently, agencies must conduct numerous site visits during meal service, adding unfunded costs to the sponsoring agency, particularly for sponsors in rural areas or small sites.
- Reduce monitoring burden for state agencies as well (align with CACFP which is every three years).

### **Increase funding**

Just as schools struggle to operate the NSLP under current reimbursement rates, the many small organizations providing SFSP face significant challenges in covering all costs.

Congress should:

- Assess the true costs of operating the SFSP and increase reimbursement rates accordingly.
- Grants should be made available to underserved areas for start-up and expansion of programs. The successful Rural Transportation grant should be made permanent.
- Increase sanitation inspection dollars to offset sponsors' administrative costs.

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## **Program Recommendations: Child and Adult Care Food Program**

### **Improve access and expand participation**

Recognizing that quality nutrients are vital to the health and wellbeing of our youngest children, access to nutrition programs while in child care should be a priority. In order to reach all eligible children, a more realistic measure of poverty should be considered in meal site placement.

Congress should:

- Allow program sponsors to operate the after school program at the 40-49 percent free and reduced price eligibility threshold.
- Develop area eligibility criteria for CACFP care centers.
- Provide federal matching dollars to states to work with community-based organizations on child nutrition outreach, similar to the current food stamp outreach program.

### **Improve nutritional quality**

Like SFSP, CACFP meal patterns have not been updated since the program's inception in 1968. The diversity of sites and food preparation methods complicate efforts to provide nourishing and appealing meals and snacks. Food and beverages served in all child care settings do not always promote development of eating patterns that match the 2005 Dietary Guidelines for Americans.

Congress should:

- Require USDA to immediately update meal patterns to align with Dietary Guidelines.
- Base meal patterns on age since older children require more nutrition.
- Encourage sponsors to gather student and parent input into menus.
- Allow sponsors greater latitude with contract substitutions to meet student preferences.
- Provide higher CACFP reimbursement tied to improved CACFP nutrition standards that meet or exceed targets outlined in the 2005 Dietary Guidelines for Americans.
- Require CACFP sponsors to provide nutrition education in exchange for higher administrative reimbursement. A nutrition education component should be added to sponsors' monitoring visits. A higher administrative reimbursement should coincide to offset additional personnel costs.
- Expand the CACFP "At-Risk" supper pilot program to all 50 states, ensuring older students receive a more adequate meal.
- Add an additional (third) component to the after school snack program to allow sponsors to serve a more nutritionally balanced snack.

### **Streamline administrative efficiency**

While the benefits of CACFP are clear, many providers do not participate in the program because the paperwork is too burdensome. USDA convened a Paperwork Reduction Task Force and issued several policy memoranda, but the burden on sponsoring agencies still remains enormous. In Oregon the participation in Family Child Care Homes in CACFP has dropped nearly 37 percent in the past 10 years.

Congress should:

- Direct USDA to immediately reduce paperwork requirements on both providers and sponsors. Activities deemed vital to sustain program integrity should be simplified as much as possible and technology should be used to make complying with the remaining requirements easier.
- Reduce the administrative burden on single sites and Family Day Care homes.
- Allow alternative methods of qualifying childcare centers (letting them quality every 5 years) and basing Tier 1 and “At-Risk” at 40 percent area eligibility and allow any month’s data to be used.

### **Increase funding**

Just as schools struggle to operate the NSLP under current reimbursement rates, many small organizations providing CACFP also face significant challenges in covering all costs.

Congress should:

- Assess the true costs of operating the CACFP and increase reimbursement rates accordingly.
- Grants should be made available to underserved areas for start-up and expansion. The successful SFSP Rural Transportation grant should be made available for after school programs as well.
- Increase sanitation inspection dollars to offset sponsors’ administrative costs.

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## **Program Recommendations: Women, Infants and Children Program**

### **Improve access and expand participation**

WIC successfully reaches its target population with benefits and services because of its current eligibility rules and extraordinary emphasis on culturally appropriate customer service.

Congress should:

- Continue to allow adjunctive eligibility for WIC at each states’ current Medicaid eligibility threshold.
- Protect existing eligibility rules.
- Lengthen certification duration options.

### **Improve nutritional quality**

Dozens of scientific studies have shown WIC to be a cost-effective and a positive public health intervention, preventing infant mortality, low birth weight and other poor birth outcomes, and improving the nutrition and health of participants. The updated food package will be implemented in 2009, providing WIC participants with obesity-preventing foods, which will be supported by clear messages, resulting in better dietary habits for WIC families.

Congress should:

- Continue to support breastfeeding peer counseling.
- Allow use of telephone and computer-assisted nutrition education.
- Encourage coordinated health messaging across federal nutrition programs.

**Increase funding**

Congress should:


- Increase funding for MIS improvements from \$30 million to \$60 million annually.
- Ensure adequate funding to support the full extent of the need.
- Nutrition Service and Administrative (NSA) funding should reflect current costs.
- Include contingency funds so that WIC can appropriately respond to rising food costs and greater need among low-income families facing financial hardship during economic downturns.

We appreciate USDA's commitment to these programs and its solicitation of these public comments.

Cordially,



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