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Andrew D. Rivas, J.D.
EXECUTIVE DIRECTOR

October 15, 2008

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

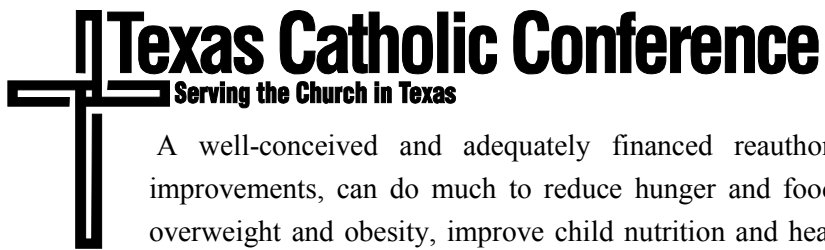
Dear Mr. Eadie,

The Bishops of Texas are concerned about the health and welfare of all Texans, especially the poor and vulnerable. The Gospel is clear in calling us to feed the hungry and we operate numerous food pantries and other food assistance programs throughout the state. Our assistance programs have recently become overwhelmed with the needs of the hungry and we are concerned that as companies in Texas adjust to the recession the need for food assistance will only grow. We recognize the role of many federal programs in providing for the common good and assuring that our most vulnerable have a healthy start in life.

We believe the upcoming reauthorization of the child nutrition programs and WIC should provide the opportunity to improve access, meal quality and nutrition in the school breakfast and lunch, summer nutrition, afterschool and child and adult care food programs, and in WIC. These programs are profoundly important to the millions of low-income children and communities struggling to combat childhood hunger and improve children's health in Texas and across the Southwest.

Hunger is a persistent and serious problem in the Southwest Region. Our states have some of the highest levels of hunger and food insecurity in the country. The states of Arkansas, Louisiana, New Mexico, Oklahoma, and Texas all have food insecurity, hunger, and poverty rates that are higher than the national average. In fact, Texas ranks third in the percentage of food insecure families.

Rising food and gas prices are exacerbating these problems, forcing more and more working families into poverty and increasing the number of children who must rely on the nutrition safety net to meet their food needs. These costs are also hitting many other industries and sectors of our society – times are hard all over. Now is the time to rise to these challenges. Now is the time to recognize that child nutrition is a crisis that is directly within our control. It is a system that we have the tools to fix, and child nutrition reauthorization presents the perfect opportunity to fix it.



A well-conceived and adequately financed reauthorization bill, focused on the right program improvements, can do much to reduce hunger and food insecurity, address the problem of childhood overweight and obesity, improve child nutrition and health, and enhance child development and school readiness. Our recommendations below would improve the programs and give an important boost to children in Texas, the Southwest region, and across the nations.

Improve Access and Participation

These nutrition programs provide important resources to feed children, but there are a number of ways to improve them so they better meet the needs of the children they were designed to serve. For example, it would serve both the goal of reducing food insecurity and the goal of promoting healthy eating if Congress and USDA were to:

- **Raise meal reimbursement rates** and develop other strategies to help struggling community-based nutrition providers cope with the surges in food and energy prices;
- **Fund aggressive outreach efforts** to allow more eligible children to participate;
- **Reduce the current 50 percent area eligibility threshold** in order to serve more children in need of these programs, which now leave many low-income families without access;
- **Dramatically revise or eliminate the burdensome CACFP means test** for children in family child care homes and thereby open up access for low-income working families;
- **Make available suppers for school-aged children in afterschool programs** in low-income areas in the same way that snacks now are available, in order to provide food and supervision as more parents work and commute long hours and programs run into the late afternoon and evening; and
- **Make available suppers as a third meal for preschool children** in child care for more than eight hours (currently, CACFP will not provide reimbursement for three meals – only up to two meals and a snack).

Support healthy eating habits that help prevent childhood obesity and other nutrition-related diseases

The child nutrition programs can foster healthy eating habits that help to prevent childhood obesity and other nutrition-related diseases. Increasing the availability and consumption of fruits and vegetables and whole grains, and moving to lower-fat dairy products is the key to strengthening the ability of the child nutrition programs to improve children's nutritional health. Promoting healthier eating, preventing obesity and improving child (and adult) health through these programs can be achieved in a number of ways, including:

- **Increasing child nutrition program reimbursement rates** to support all school and community-based providers, including summer, afterschool and child care providers and sponsors in their efforts to provide healthy meals and snacks. Our schools and community organizations are struggling right now to serve nutritional food to the growing number of children in need, given the inadequacy of the current reimbursement rates and the impact of rising food and energy costs. If Congress is serious about using these programs to fight obesity and improve health, then they must appropriate significant new resources to increase reimbursement rates. *All of the other*

recommendations we have related to improving meal quality are dependent on higher reimbursement rates;

- **Improving meal quality by regularly updating the child care and school nutrition meal patterns and the WIC food package** to insure that they stay current with nutrition science and best practice;
- **Establishing strict rules related to the so-called “competitive” foods sold in schools** to assure that they contribute to the health and well-being of children;
- **Eliminating conflicting nutrition regulations** to give our local meal planners the flexibility and power they need to offer healthy meals; and
- **Improving participation rates in all of the programs** in order to draw children into the healthier eating environments they provide.

Expand the School Breakfast Program

Good school nutrition is not only essential to children’s health; it also boosts academic achievement and school performance. Numerous studies show hunger’s detrimental effect on a child’s ability to learn and thrive in school. Correspondingly, a huge range of studies find that WIC children enter school ready to learn and show better cognitive performance; and that school breakfast improves classroom behavior, test scores, grades and school attendance.

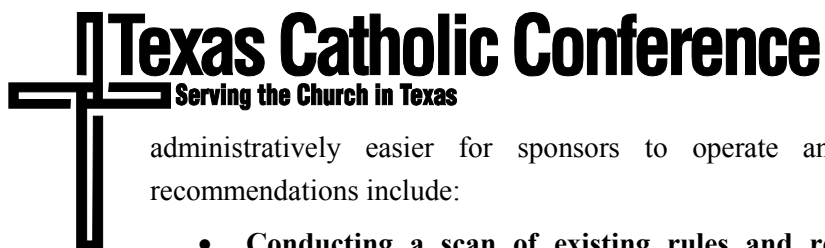
Texas, for example, has made great strides in expanding school breakfast participation. Ninety-nine percent of Texas schools participate in the national School Breakfast Program. This ranks Texas 7th best in the country. Over a million Texas children are eating breakfast at school, and over 140 school districts (more than 10% of all districts) offer free breakfast to all students regardless of family income. Yet, For every 100 low-income children that participated in the School Lunch Program in Texas, still only 53 also ate breakfast. With support from Congress and USDA we can build on do even better.

We can meet more of the nation’s education goals and do so more rapidly and cost-effectively if we ensure that many more children benefit from key nutrition supports through:

- **Expansion of breakfast-for-all programs**, especially in lower-income communities, where all children can receive a school breakfast in the cafeteria or in the classroom at no charge;
- **Start-up grants for school districts** to cover initial, one-time equipment costs for breakfast programs; and
- **Making sure that school lunch and breakfast are as healthy as possible**, served at reasonable times and with enough time for children to eat.

Reduce Administrative Barriers

Research and experience has proven that program access and integrity are mutually achievable goals. Simplifying the rules and improving coordination in the child nutrition programs will make it easier for states, schools, and other sponsors to administer them and more likely that needy children will participate in them. Unnecessary paperwork and outdated or overly burdensome administrative requirements create barriers for families and often keep potential afterschool, summer and child care providers and sponsors, schools and families from participating fully in the programs. The programs should be made



administratively easier for sponsors to operate and for parents to access. Some important recommendations include:

- **Conducting a scan of existing rules and regulations** and eliminating or updating those requirements that are no longer needed or can be achieved in a manner that is less onerous for sponsors and families. For example, direct certification in the school lunch program takes advantage of innovations in technology to reduce paperwork for both schools and parents;
- **Improving direct certification for school meals** through state data matching systems;
- **Expanding pilot programs that eliminate or reduce paper applications** and rely more on electronic applications and on alternative means (e.g., use of neighborhood or district-wide census data) to determine reimbursement for schools and other providers;
- **Streamlining program operations, increasing flexibility, and maximizing technology and innovation** to allow sponsoring organizations and providers to operate most effectively;
- **Offering states the flexibility to experiment with simplified eligibility systems** that meet federal standards while reducing the bureaucracy and stigma associated with the three-tier pricing system in CACFP;
- **Restoring advance funds** for CACFP sponsors and child care centers to cover program costs upfront; and **Easing the administrative burdens on organizations that operate multiple child nutrition programs.**

Conclusion

In 1946, Congress passed the National School Lunch Act as a “measure of national security, to safeguard the health and well-being of the Nation’s children and to encourage the domestic consumption of nutritious agricultural commodities.” Since then Congress has wisely improved the child nutrition programs – initiating and strengthening WIC, school breakfast, summer food, child care food and afterschool nutrition – to better serve children and families and adjust to changes in our economy, our families, our workplaces, our schools and our communities. We must continue to invest in these public structures that since World War II have existed to safeguard a healthy workforce and hunger-free childhood for all Americans. The overarching and equally weighted goals of the 2009 reauthorization of the child nutrition programs should be for these programs to be responsive to the current economic, health, and educational needs of America’s families and to safeguard and improve our children’s health and well-being and thereby strengthen the nation.

We appreciate the opportunity to share our recommendations. We look forward to working in partnership with the community to make these recommendations a reality as we all strive to feed the hungry.

Respectfully Submitted,

Andrew Rivas

Executive Director

Texas Catholic Conference