

**PERSPECTIVES ON CHILD  
NUTRITION REAUTHORIZATION**

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**HEARING**

BEFORE THE

**COMMITTEE ON AGRICULTURE,  
NUTRITION, AND FORESTRY**

**UNITED STATES SENATE**

**ONE HUNDRED SIXTEENTH CONGRESS**

FIRST SESSION

APRIL 10, 2019

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## **PERSPECTIVES ON CHILD NUTRITION REAUTHORIZATION**

**WEDNESDAY, APRIL 10, 2019**

U.S. SENATE,  
COMMITTEE ON AGRICULTURE, NUTRITION, AND FORESTRY,  
*Washington, DC.*

The Committee met, pursuant to notice, at 10:02 a.m., in room 216, Hart Senate Office Building, Hon. Pat Roberts, Chairman of the Committee, presiding.

Present: Senators Roberts, McConnell, Boozman, Hoeven, Ernst, Hyde-Smith, Braun, Grassley, Thune, Fischer, Stabenow, Brown, Bennet, Gillibrand, Casey, Smith, and Durbin.

### **STATEMENT OF HON. PAT ROBERTS, U.S. SENATOR FROM THE STATE OF KANSAS, CHAIRMAN, U.S. COMMITTEE ON AGRICULTURE, NUTRITION, AND FORESTRY**

Chairman ROBERTS. I call this hearing of the Committee on Agriculture, Nutrition, and Forestry to order.

This hearing examines child nutrition programs which have consistently benefited from broad bipartisan support. The Committee looks forward to that continuing today as we hear perspectives on child nutrition reauthorization.

I remind everybody that the last child nutrition reauthorization was completed in 2010, 8 to 9 years ago, I would say to my distinguished Ranking Member, so it is again necessary to take a fresh look to find ways to provide certainty, to reduce administrative redundancies, and allow flexibility at the local level to better serve participants and stakeholders.

School food service directors are constantly stretching every dollar to provide nutritious, affordable meals to their students, and they are finding new and creative ways to prepare foods in a manner so that students will eat them. Ever-changing rules in reporting makes this far more difficult.

I have visited many Kansas schools as there are close to 300 school districts in Kansas. Now, considering how many districts there are in the entire United States and how different each district is, it is clear that a one-size-fits-all approach simply will not work for everyone.

The same is true for nonprofits and charitable organizations and, of course, for the participants—the children, the students, the mothers, and families who use these programs. This includes the National School Lunch Program, the National School Breakfast Program, the Summer Food Service Program, the Child and Adult Care Food Program, and the Special Supplemental Nutrition Pro-

gram for Women, Infants, and Children, commonly referred to as “WIC.” There is also the Special Milk Program, the Fresh Fruit and Vegetable Program, the Farm to School Program—do you know of any other program?

Senator STABENOW. We have got a few.

Chairman ROBERTS. Other programs that are part of this process. Combined, these programs account for \$30 billion in annual mandatory and discretionary spending, so it is important for us—meaning Congress, and more directly this Committee—to review how these programs are working. Today we will hear from the Department of Agriculture’s Food and Nutrition Service about how they are managing these programs. To that end, it is ordered that this letter and attachment on program integrity and related issues from the Department’s Deputy Secretary Stephen Censky, dated June 20, 2018, be included in the Committee record of today’s hearing.

[The following information can be found on page 136 in the appendix.]

Chairman ROBERTS. We will also hear from the Government Accountability Office about how the Department of Agriculture is administering these programs. On our second panel, we will be hearing from those who are operating and implementing these programs at the ground level.

There is a pathway for child nutrition programs to be reauthorized in a bipartisan manner yet this year, and today’s hearing is the first step in this process.

I now turn to our distinguished Ranking Member, Senator Stabenow, for any opening remarks she may have at this time.

**STATEMENT OF HON. DEBBIE STABENOW, U.S. SENATOR  
FROM THE STATE OF MICHIGAN**

Senator STABENOW. Well, thank you, Mr. Chairman. Thank you for holding this very, very important hearing. Thank you to all of the witnesses that are joining us today.

I am very proud of the work we have done together on the Committee to expand access to healthy foods for families. Our recent farm bill strengthened nutrition education and made nutritious food more affordable, with incentives for fruits and vegetables and produce prescriptions.

The foundation of healthy families, as we all know, and a healthy future really starts with our children. As this Committee begins the reauthorization process, it is important to remember how critical child nutrition is to the future of our country. Whether it is ensuring a mother is getting enough calcium to build healthy bones for her baby or making sure that a 10-year-old is not fighting hunger pains in math class, child nutrition is about building a stronger future.

It is also important to our national security. Interestingly, the National School Lunch Program was created in the 1940’s because General Lewis Hershey came before Congress to explain that recruits were being rejected due to malnutrition. Today over 750 retired generals—many have come before this Committee in the past—and other military leaders are sounding alarm bells again, this time because young adults are too overweight to serve. With

14 percent of children as young as 2 showing signs of obesity, we have to address this issue early, and everywhere our children are forming healthy habits is an area we need to focus on.

In the past decade, we have certainly made progress to help improve healthy eating in cafeterias, daycare centers, and while children are out and about and out of school.

In my home State of Michigan, nearly 1,600 schools and cities from Dexter to Detroit are using farm-to-school initiatives to grow their own salad greens, tomatoes, and peppers. Michigan is leading the way in using Summer EBT to ensure students do not go hungry during the summer months when school is out. The expansion of this program in Flint has been critical to helping families mitigate the impact of lead in their children.

Additionally, Michigan was one of the first States to roll out the community eligibility provision, an improvement that expands access to healthy meals for children while reducing paperwork for schools and families.

There are examples like these happening everywhere in the country in communities in every State represented on this Committee. Even though we have seen great progress, it is vital that we keep moving forward, not backward, and that certainly is one of my goals, to make sure we keep moving forward. I know the Chairman joins in that as well.

Obesity rates for adolescent children continue to rise, yet at the same time, over 12 million children in this country do not have enough to eat. This is a crisis of both child nutrition, child health, and hunger. We need to address this crisis by improving access to nutritious foods so our kids get healthy, not hungrier.

Our children need healthy lunch options, and they also need wholesome breakfasts and after-school snacks, and we know hunger does not take a break when school is out for the summer. Whether it is a summer meals program at the YMCA to help prevent the summer learning slide or a veggie van driving out to a rural community to ensure children have healthy meals in July, we need to do better.

We also know many moms and babies rely on WIC to provide healthy food at home during these critical first stages of life. As important developmental milestones continue throughout childhood, we should make sure young children are not falling through the cracks either. Our child nutrition programs help set up our children up for success.

We can and should look for ways to streamline paperwork and make it easier for providers to focus on serving healthy meals to kids. However, we can and should do that without backtracking on the progress we have made on healthy food and critical access.

Mr. Chairman, I look forward to working with you and the members of the Committee, as we always do together, in this case to strengthen our child nutrition programs, and I know that you and I agree that the health and well-being of our children is not a partisan issue. This is an issue of the future, and I look forward to success once again in our Committee. Thank you, Mr. Chairman.

Chairman ROBERTS. I thank our distinguished Ranking Member.

On our second panel we have a witness, Mr. Michael J. Halligan, who is chief executive officer of God's Pantry Food Bank in Lex-

ington, Kentucky. It is my honor to recognize our distinguished Leader for his introduction of that witness. Leader McConnell.

Senator MCCONNELL. Thank you, Mr. Chairman and Senator Stabenow. I appreciate the opportunity to have a chance to cut in here to introduce someone from Kentucky who will be on the next panel.

I am really pleased to have the opportunity to introduce my fellow Kentuckian, Mike Halligan, who runs God's Pantry Food Bank based in Lexington and who will be on today's second panel, as I said.

God's Pantry has been serving Kentuckians in need since 1955. Today it operates in 50 counties in central and eastern Kentucky. It represents one part of a nationwide system of organizations working to create a hunger-free America.

Mike joined God's Pantry in 2017 after more than 30 years in senior positions throughout the food and grocery industries. With its affiliates and partners, including Kentucky Agriculture Commissioner Ryan Quarles, God's Pantry distributed more than 34 million pounds of food in the last Fiscal Year to those in need in my State.

The heartbreaking fact is that one in five Kentucky children experience food insecurity. Worse still, these kids are also more likely to suffer chronic health and developmental issues throughout their lives as a result. Youngsters should be able to concentrate on school and on learning the skills they need to succeed. They should not have to worry about where they will find their next meal.

At God's Pantry, Mike and his team address this problem head on. Through programs at schools, libraries, and churches, his organization works hard to ensure children have year-round access to nutritious meals.

For example, to fill in for the absence of school lunches during the summer months, God's Pantry goes into many Kentucky communities to deliver meals and snacks free of charge.

In our State, which has many diverse regions and communities, that can pose a serious logistical challenge. Helping get the food needed to children in Lexington, an urban area, is quite different from helping kids in the mountains of Appalachia. God's Pantry manages to do both. Instead of a one-size-fits-all Federal program, Mike and his team need the flexibility to reach children wherever they can do the most good.

Right now, Federal restrictions limit his ability to send kids home from school with food over the weekend, and not every kid is able to find transportation to get meals during the summer months when the school buses are not running.

So as we consider reauthorization of the child nutrition programs, I hope we can address these challenges to ensure that red tape is not getting in the way of serving those who need our help.

Mike's successful track record of helping Kentuckians will bring a valuable perspective, and I am confident this Committee will benefit from his testimony today.

So, Mr. Chairman, Senator Stabenow, thank you once again for giving me an opportunity to sort of butt in here and for the opportunity to introduce this fine Kentuckian who is doing a lot of extremely important work in my State.



Thank you very much.

Chairman ROBERTS. Senator McConnell, I can certainly emphasize that you are not butting in. You are welcome here anytime on any subject that you would like to participate in on the sometimes powerful Senate Agriculture Committee.

[Laughter.]

Senator MCCONNELL. See you later.

Chairman ROBERTS. We now welcome the first panel of witnesses before the Committee this morning.

Mr. Brandon Lipps—welcome, Brandon—Acting Deputy Under Secretary for Food, Nutrition, and Consumer Services within the Department of Agriculture, and he also serves as the Administrator of the Food and Nutrition Service as well as the Acting Deputy Secretary of Food, Nutrition, and Consumer Services at the Department. As the FNS Administrator, he oversees the 15 nutrition assistance programs at the Department. Prior to his time at the Department, Mr. Lipps served as the chief of staff in the Office of Chancellor Robert Duncan at Texas Tech University.

I would tell the distinguished Ranking Member that we should extend our sympathies to the Red Raiders and—

Senator STABENOW. Not really.

[Laughter.]

Chairman ROBERTS. The Red Raiders are from the Big 12 Conference. They play Kansas State University. I think we actually somehow beat you one game, but I am not sure about that. I was cheering for you all the way.

Senator STABENOW. I was not.

[Laughter.]

Chairman ROBERTS. He previously worked on nutrition issues as a staff member of the House Agriculture Committee.

**STATEMENT OF BRANDON LIPPS, ACTING DEPUTY UNDER SECRETARY FOR FOOD, NUTRITION, AND CONSUMER SERVICES, U.S. DEPARTMENT OF AGRICULTURE, WASHINGTON, D.C.**

Mr. LIPPS. Thank you, Chairman Roberts and Ranking Member Stabenow, and thank you for the opportunity to testify today on reauthorization of child nutrition and WIC programs. I appreciate your comments with regard to my alma mater. We know the Big 12 is a powerhouse, and we will continue to try to show that as we move forward.

I am Brandon Lipps, the Acting Deputy Under Secretary for Food, Nutrition, and Consumer Services at the U.S. Department of Agriculture. As you know, nutrition assistance programs leverage the Nation's agricultural abundance that is important to this Committee and to all of us to ensure that every American has access to wholesome, nutritious food.

This Committee is keenly aware of the critical importance of all of these programs. Just to mention a few, on an average day almost 30 million children receive a school lunch and 15 million children receive a school breakfast. Over 4.5 million receive meals and snacks in child-care settings through the Child and Adult Care Feeding Program, which we refer to as CACFP. Last summer, almost 146 million meals were served to approximately 2.7 million

children through the Summer Food Service Program. WIC served a monthly average of 6.9 million women, infants, and children in Fiscal Year 2018. These programs ensure access to nutritious food so that children can grow, learn, and develop properly.

I join you today to contribute to a reauthorization process that builds on the programs' history of success, while also advancing the administration's nutrition priorities—to improve customer service for our participants, to protect and enhance integrity, and to strengthen the bonds between FNS programs and self-sufficiency.

When I am on the road, I say that self-sufficiency at the Food Nutrition Service begins in our WIC Program. Infants who do not have proper nutrition cannot develop into children who can learn in our schools. Any teacher will tell you that school children who do not have adequate nutrition and full stomachs do not learn well in class. Those kids cannot develop into self-sufficient adults contributing to society if we do not give them the start that they need through these programs.

I would like to share some of our activities today related to the child nutrition and WIC, particularly in the areas of customer service and integrity.

Secretary Perdue, as you know, has placed a robust focus on customer service across the Department. Great customer service, we believe, starts with listening to our customers and addressing their needs and challenges.

I have had the chance to visit many of our programs, one of the favorite parts of my job, from WIC clinics to summer stops to daycare centers that operate our CACFP Program. I have consistently heard the importance of these programs in ensuring that children can grow and learn, but also the importance of local flexibilities to ensure kids will eat the foods that we provide through these programs.

This sentiment echoes what both the Secretary and I have heard since before we started these jobs at USDA. That is why one of the Secretary's first actions was to extend school lunch flexibilities related to milk, whole grains, and sodium.

We also heard that our education and training standards for our food service professionals in schools put a hiring strain particularly on many small school districts. So we revised those rules to allow more flexibility.

I am proud of these successes, but there is more to be done, so we continue to listen to our customers each and every day through formal and informal settings. We do this because local nutrition operators know their student customers and their communities best. Similarly, I have held roundtables with the WIC community, including operators, business partners, and participants, to better understand the challenges of operating this very important program. Hearing and heeding the customer's voice is just good business. We all know that, whatever business we are in.

Just as important as good customer service is strong program integrity to ensure public confidence in these programs. Here again we listened and heard that school meal program operators needed better tools to improve integrity and efficiency in easy-to-use ways. FNS has responded with new resources such as web-based school meals applications to minimize errors. We also proposed in the Fis-

cal Year 2020 budget to strengthen income eligibility verification processes, to focus more on applications at high risk for error.

Finally, in the last reauthorization, Congress set the expectation that all WIC agencies implement electronic benefit transfer by October 2020. The move to EBT supports increased program integrity and efficiency while enhancing the customer experience and service. I can report that today 48 WIC State, territorial, and tribal agencies have successfully implemented EBT Statewide, and the remaining 42 are in planning or implementation.

Last, we also worked closely with oversight organizations such as the GAO, who joins us today, and USDA's Office of Inspector General to identify and address integrity challenges. We appreciate our partnerships with these agencies, the opportunities for improvement that they provide to us, and we actively work with them to improve our programs each and every day.

In closing, I want to thank the Committee for your engagement with USDA to support this reauthorization of these very important programs. I know the painstaking effort of this reauthorization process. The Department stands ready to support and provide technical assistance to you as needed as you complete these deliberations.

Thank you, Mr. Chairman, and I am happy to answer any questions.

[The prepared statement of Mr. Lipps can be found on page 42 in the appendix.]

Chairman ROBERTS. Mr. Lipps, thank you for that very comprehensive statement.

Our next witness is Ms. Kathryn Larin, Director of Education, Workforce, and Income Security within the Government Accountability Office. Ms. Larin is the Director of the Education, Workforce, and Income Security team at the GAO. While part of the GAO's Forensic Audit and Investigative Services team, Ms. Larin oversaw forensic audits and investigations of fraud, waste, and abuse across a range of Federal programs. Prior to her time at the GAO, Ms. Larin served as a senior analyst at the Center on Budget and Policy Priorities, and she served as an Economist at the U.S. Department of Education's Planning and Evaluation Service on Postsecondary Education Issues. Welcome. We look forward to your testimony.

**STATEMENT OF KATHRYN A. LARIN, DIRECTOR, EDUCATION, WORKFORCE, AND INCOME SECURITY, U.S. GOVERNMENT ACCOUNTABILITY OFFICE, WASHINGTON, D.C.**

Ms. LARIN. Chairman Roberts, Ranking Member Stabenow, and members of the Committee, I am pleased to be here today to discuss our work on program integrity in USDA's child nutrition programs.

In Fiscal Year 2018, the Federal Government provided about \$30 billion for these programs, including school meals, WIC, and the Summer Food Service Program, among others. My testimony today will address two items: actions USDA's Food and Nutrition Service has taken to improve the integrity of programs in response to GAO recommendations, and improper payments.

First, regarding USDA actions, we have identified several opportunities for FNS to improve oversight of the school meals programs. For example, in 2014, we found evidence that States were not consistently documenting noncompliance with Federal regulations, nor were they requiring corrective actions to address issues they found while monitoring programs. Further, we found that States needed more guidance on how to monitor the financial management of school meals programs, an area States were newly required to review.

In response to our recommendations, FNS has taken steps to strengthen compliance reviews and corrective action plans and, after assessing States' information needs, issued guidance to improve financial oversight.

GAO also did work looking at the process for verifying that only those children eligible for school meals participate in the program. In our May 2014 report, we recommended that FNS take multiple steps to improve the verification process, and FNS took actions in response to all of our recommendations.

For example, FNS distributed guidance that would make it easier to identify questionable or ineligible applications so they could be flagged for further verification.

We also identified ways that FNS could improve the program integrity and oversight of the WIC Program. Our 2013 review found that FNS monitoring reports identified concerns about income eligibility determination policies in a third of the States reviewed. Yet FNS had not used this information to target assistance to States.

In response to our recommendation, FNS developed a process for reviewing and acting on the results of its monitoring reports.

In addition, in 2014 we found that FNS had provided limited assistance to States in preventing online infant formula sales, a practice that is prohibited under program rules. FNS has taken action to help reduce the likelihood of online sales and is currently developing guidance on best practices to disseminate to States later this year.

Finally, our May 2018 report on the Summer Food Service Program identified additional areas where FNS could improve program integrity. For example, we found that FNS did not collect reliable data on program participation and that estimates were calculated inconsistently from State to State and from year to year. FNS has since reported plans to address this recommendation.

Turning now to improper payments, USDA currently reports improper payments in four child nutrition programs: School Lunch and Breakfast, WIC, and the Child and Adult Care Food Program. In Fiscal Year 2018, USDA reported improper payments of \$1.8 billion in these programs. This represents just over 1 percent of the \$151 billion in improper payments Federal agencies reported across the Government that year.

In recent years, annual improper payment rates were highest in the school meals programs, with rates of about 15 percent for School Lunch and 24 percent for School Breakfast. Improper payments in school meals programs remained generally steady until Fiscal Year 2018 when USDA changed what it considers to be an improper payment. This change resulted in improper payment estimates that are substantially lower than those from prior years.

USDA reported that it made this change after consulting with the Office of Management and Budget.

With regard to other child nutrition programs, following a 2018 Inspector General report on the Summer Food Service Program, USDA reassessed the program's improper payment risk, determined it to be high risk, and is moving forward in developing an estimate for this program.

In conclusion, USDA's child nutrition programs play a critical role in ensuring that the Nation's children have access to needed nutrition. USDA has taken several actions to improve the integrity of these programs, and we continue to monitor their progress in addressing our recommendations and reducing improper payments.

This concludes my statement. I am happy to answer any questions you may have.

[The prepared statement of Ms. Larin can be found on page 46 in the appendix.]

Chairman ROBERTS. Let us start with Mr. Lipps. I am pleased the Department was able to secure the progress made by schools to serve more nutrition meals while returning some local flexibility to school meal planning. Can you talk to what has changed and what has not changed in the nutrition standards that were just finalized? Do you anticipate additional changes?

Mr. LIPPS. Thank you, Mr. Chairman. The final rule that we issued in December provided flexibilities to school to offer 1-percent flavored milk, to have 50 percent of their whole grain items be whole grain rich, and delayed the implementation of the date of Target 2 on sodium. What did not change is the core requirements of the nutrition standards of the school meal programs.

What we see as we look at that, when you look at things like plate waste, is that we have carefully at FNS calculated the nutritional requirements of those students. If they are not consuming the foods provided on those plates, they are not getting the nutrition that is provided to them. So we want to give the local school operators who look those kids in the eyes every day some minimal flexibility to make sure that kids are getting meals that they will eat so that they are consuming that nutrition.

With regard to future changes, we continue to listen to our customers who run these programs each and every day, to your constituents who run and who eat these programs, and we will be considering those issues as we move forward if more flexibility is needed or if we are at a place that works for everybody.

Chairman ROBERTS. Thank you.

For either Mr. Lipps or Ms. Larin—probably to you, Ms. Larin—I am curious for your thoughts on program integrity. In your written testimony, you discuss two 2014 GAO reports on school meals. In particular, can you elaborate for the Committee how State oversight of local school food authorities is integral to child nutrition program integrity?

Ms. LARIN. Yes. As you said, State oversight is critical to program integrity, and in our 2014 work, we looked at that State oversight, and we found a couple of concerns.

One of those concerns was that States were focusing more on providing technical assistance to school food authorities in implementing the new changes to the nutrition requirements rather

than focusing on compliance. We made a recommendation to USDA, and in response they have strengthened their oversight and focused more on compliance and implementing corrective actions.

Chairman ROBERTS. Mr. Lipps, can you discuss the Department's goals for improving the integrity of States' administration of the school meal programs through training and technical assistance, please?

Mr. LIPPS. Yes, sir. I do want to say that we appreciate GAO's partnership on this front in bringing issues to us and helping us find resolution to those. She is correct that States' oversight of these programs is extremely important as we work with States to help schools administer these programs well.

We work closely with States but also with school districts on providing guidance and technical assistance on opportunities to run these programs better. Our staff are present at conferences in State school districts on a regular occasion. I spoke at one conference where our staff presented over 30 different sessions providing technical assistance to both State agencies and schools on how to better run their programs.

We also produce at the national level a lot of helpful, useful tools for both States and school districts. We have put out a verification toolkit to help schools better understand how to verify school meals applications. We developed at FNS an online school meal application that helps reduce error rates in those school meals applications. So we have a number of opportunities to continue to provide that technical assistance and a wonderful staff that is committed to doing that.

Chairman ROBERTS. Ms. Larin, your testimony indicates that of the 14 GAO recommendations, the Department of Agriculture has addressed 9, taken steps to address 1, and is planning to address the remaining 4. Can you elaborate on that?

Ms. LARIN. Yes. USDA has taken steps to address all of the recommendations we have made with regard to the school meals programs. We have one outstanding recommendation in the WIC Program to prevent online formula sales, and they have taken some steps to address that. We still have recommendations outstanding for the Summer Food Service Program. That was work that we just completed in May 2018, and the Department did agree with those recommendations, but they are not yet implemented.

Chairman ROBERTS. I appreciate that.

Senator STABENOW.

Senator STABENOW. Thank you, Mr. Chairman. Thank you again to both of you. These are such important programs, and it is important that we have accountability and transparency and oversight. So we appreciate the input of GAO and the fact that USDA is following through closely, working to make improvements where it is recognized that there need to be improvements. So thank you very much for that.

I think it is important to clarify a couple of things as we talk about improper payments because, Ms. Larin, improper payments for school meals do not just mean a child who is not eligible is getting a free meal, correct? It could also be a child receiving a reduced-price meal who should be getting a free meal. Isn't that cor-

rect, it can go either way? Improper payments can be too much, too little. Is that correct?

Ms. LARIN. That is correct. Improper payments includes both overpayments and underpayments.

Senator STABENOW. Which is important, I think, for us as we look at this.

If a family does not respond, even if a child could actually be eligible to receive a free or reduced-price meal, is that still considered an error if they do not respond? In other words, in this case the family is not responding. The child could be eligible. As I understand it, that has been viewed as an error. Is that still true?

Ms. LARIN. If a child is not even enrolled in the program, they would not be counted in the improper payments.

Senator STABENOW. If they are enrolled but somehow the family is not responding on the paperwork, is that viewed as an error?

Mr. LIPPS. Senator, I am not sure specifically what you are referring to, but I think it may be a case where we are verifying eligibility of a child and there is questionable information on the application, a parent will not respond. If we cannot verify that, I think we are required to count that as an error.

Senator STABENOW. Count that as an error.

Mr. LIPPS. That is correct. There are some where, in fact, the child would be eligible but we cannot verify that.

Senator STABENOW. Okay. Both to Mr. Lipps and Ms. Larin, Mr. Lipps, you mentioned the web-based applications as a way to reduce errors. USDA has regularly noted that direct certification has also helped with program integrity. I wonder if you both could talk a little bit more about the opportunities like these to utilize technology to improve integrity without jeopardizing meals for children in need.

Mr. LIPPS. Sure. Senator, anytime we can match across our 15 programs eligibility standards where folks have already provided the required information for one program and become eligible, it makes sense for everybody along the chain, from the Feds to the States to the recipient, to allow direct certification of that. It reduces the errors because they do not have to provide the information multiple times. We do some of that now. We are testing some of that now, and there are certainly opportunities to improve that in the future.

Senator STABENOW. All right. Ms. Larin?

Ms. LARIN. Yes, when we looked at the verification process, the recommendations that we made were really around the applications that were submitted individually by the families. That is where most of the errors were. Direct certification and community eligibility is another process that reduces errors in certification.

Senator STABENOW. Great. Are there technologies that might also help reduce the burden on schools administering the programs as well as helping with errors related to meal counting?

Mr. LIPPS. Yes, ma'am. We have a team of folks at FNS that are continually dedicated to looking at that, and they have working groups talking to State agencies and schools about opportunities for improving that. Obviously, the online school meals app was a big part of that. We have a new online buying guide for school meal service professionals that we put out. Technology is large improve-

ment for, as the Chairman mentioned in his opening statement, the many constraints that school districts face in trying to run this program.

Senator STABENOW. I think that is very important.

Just in general, big picture, what percentage of schools were in compliance with school meals nutrition standards in 2018, prior to your final rule?

Mr. LIPPS. I do not know that stat exactly, Senator, but it is the overwhelming majority of schools.

Senator STABENOW. Well, I am proud to say in Michigan it is 99.99 percent.

Mr. LIPPS. I think that is reflective of the country.

Senator STABENOW. We are trying to find the one place where—we do not know where that is.

Mr. LIPPS. We will help you.

Senator STABENOW. Yes, so 99.99 percent. So I would say our schools are working hard and doing a good job.

Mr. LIPPS. They are.

Senator STABENOW. Thank you.

Also, Summer EBT, Mr. Lipps, this has been, as I mentioned in my opening statement, extremely successful in Michigan, in many places but especially in Flint where it has been helping to reduce the negative effects of children being exposed to lead to get good nutrition. I am concerned, though, that the Secretary is planning to shift funding away from current States, even if the States are running effective programs to address summer hunger. This is a real concern of mine.

Can you explain the specific data you hope to acquire in new locations or with new lead agencies that would justify de-prioritizing assistance to children that still face hunger in States like Michigan?

Mr. LIPPS. Well, let me start by saying, Senator, I do not think we are de-prioritizing anybody who faces hunger. That money that we receive for those summer demonstration projects is for demonstrations. We have been receiving it for a long time. There are a number of children who have been fed for a long time and a number of them who have had no access to that. We have great data on Summer EBT. You are right, it has been a successful program. We find that it does reduce particularly very low food insecurity in children. We think it has shown great results.

The Secretary and I were interested in testing demonstrations that show us new things that we can learn from those programs, which is what we were asked to do in this demo authority. So, specifically, current States were not excluded, but we did put out an RFP for the summer to ask States that want to run the program to show us how they can test new methodologies over a longer period of time. Because of how this money is provided in the appropriations process, we have only been able to test this a summer at a time with data, and we think running it this way may be useful in seeing what we can garner for more long-term oversight.

Senator STABENOW. How are you going to make sure, though, that children are still getting the food they need? Testing is great. Trying out new things is great. Children not being able to eat in the summer, not so great. So how are you going to make sure that,



you know, in current places where this has been successful and is critically needed do not lose out because we are designing this as a demonstration project to test areas?

Mr. LIPPS. You know, the program started as a demonstration. It has been demonstrating for, I think, going on 7, 8 years now. So I think that is a great conversation that we hope to all have as we continue with CNRs, is how we work to make sure that all children that are hungry in the summer have access to food. We have a number of programs that run. If the program this summer ends up moving out of areas that it is currently in, we certainly want to work with those States to do everything they can to run the other programs that they have access to for children who have been having access to the Summer EBT Program.

Senator STABENOW. So maybe we should stop calling them “demonstration programs” and just start calling them “summer feeding program”?

Mr. LIPPS. I think we would be happy to have that discussion. Unfortunately, that is what the law calls them, and—

Senator STABENOW. I know, but we write the law, so I’m asking you—we have the capacity to change that.

Mr. LIPPS. We are prepared to sit at the table and work with you on that, yes, ma’am.

Senator STABENOW. [Presiding.] Okay. Thank you very much.

Senator Ernst.

Senator ERNST. Okay. Thank you, Ranking Member Stabenow.

I do want to start by saying thanks to all for being here. This is a really important topic for so many of our children back home in Iowa, and there are a few barriers that inhibit a child’s development that are greater than hunger, and far too many of our children and families really struggle to meet the most basic of human needs.

So I hope that we can start this process to reauthorize the child nutrition programs and come together and provide flexibility and eliminate inefficiencies so that our schools and other stakeholders can focus on providing nutritious meals for those that really need them rather than spending time on so much paperwork and inspections. It is important, but we really just need to make sure our children are being fed.

So, Mr. Lipps, I would like to start with you. I have heard a number of concerns from parents and children and, believe me, when my school groups come out and I ask them if they have any questions, this is always an issue that they bring up. The concerns are about the portion sizes in the School Lunch Program. Some are worried that there are kids that receive the same portion size no matter what age they are. So you may have a first grader and an eighth grader receiving the same portion size, and in that case you have got either one child is receiving way too much food or one child is not receiving nearly enough food.

So is this a concern that you have heard about during your outreach? If so, what is the USDA doing to address this concern?

Mr. LIPPS. Senator, we do hear that. Interestingly, we hear the opposite from some of the food service operators that, you know, our school meal patterns do provide different portion sizes for the

different age groups, and some of the school food service operators want the flexibility to vary that for their children.

The Secretary believes that the school food service operators, as I think you would agree, are the ones on the ground best able to make those decisions. I think part of that is we want to make sure that children are able to be served meals that they can eat so that they are able to consume all the food on their plate. If they are not, regardless of the portion size, they are going to continue to be hungry. We certainly continue to work and listen to schools on that front, and we will continue to do so as we move forward.

Senator ERNST. Okay. That is really important, and I know not just our school, there are a number of other schools—my daughter graduated from high school just a few years back, and as parents our booster clubs would have to bring in additional food after school, especially for those that were athletes and competing in sports because they just did not get enough food throughout the day through the School Lunch Program.

So there are, you know, mandated portions. There is, of course, mandated nutritional requirements. We do see a lot of food waste as well, especially with our younger children. In your opinion, is there an action or actions that the USDA can take then to alleviate the amount of food that is thrown out of schools?

Mr. LIPPS. Yes, ma'am, I do. The Secretary's flexibility that he provided on whole grain, sodium, and fluid milk were a big step in that direction. I do not think that anybody is telling us that we need a major change in the nutrition meal pattern requirements for the school meals, but there are some flexibilities around the edges that we continue to hear from schools that we will continue to look at as we move forward to give them the flexibility to make sure that works. The school meal service operators everywhere we go are committed to providing nutritious food to kids, and they want to make sure that they have food that they will eat with full stomachs and good nutrition.

Senator ERNST. So can you talk about maybe some of the recommendations with flexibility? What would a school be able to do then?

Mr. LIPPS. The only three that we can talk about now are the flexibility on the opportunity to serve 50 percent of their grains as whole grain rich, the flexibility to serve 1-percent flavored milk, and the delay of the Target 2 in sodium to provide them some time and opportunity to introduce those foods to kids. We do continue to hear more about that, and so we are looking at that as we move forward.

Senator ERNST. Okay. I appreciate that very much.

I know that the Ranking Member, Ms. Larin, had talked about improper payments. What is the fastest and easiest way, just very quickly, for the USDA to correct this? In the 30 seconds we have remaining.

Ms. LARIN. I do not know that there is a fast and easy way. I mean, they have taken a number of steps to try and reduce improper payments. To date, the IG reports have not shown a significant decline. I think that some of those actions have not fully been implemented and assessed.

Senator ERNST. Okay. Good job. Fifteen seconds. Okay. Yes, we do need to work on some solutions in that area, but I do thank you both for your time today. Thank you.

Senator STABENOW. Thank you very much.

Senator SMITH.

Senator SMITH. Thank you, Ranking Member Stabenow and Chair Roberts. Thanks, both of you, for being with us today and for your service. I very much appreciate it.

Mr. Lipps, I would like to dive into some issues around native communities and child nutrition. I am interested in this because I also serve on the Indian Affairs Committee and the HELP Committee, so this is kind of a ripe topic.

Some of the data in this area is really quite staggering. One in four Native Americans is food insecure. In Minnesota, 33 percent of pregnant Native women experienced food insecurity in the 12 months prior to their baby being born. Childhood obesity, which is often associated with low incomes and poor nutrition, is common to many Native families.

In 2016, about 60 percent of Native children under 6 are enrolled in SNAP, and 23 percent of Native children between the ages of 2 and 5 in the WIC Program were obese.

So these are children that have the same potential and should have the same opportunities, whether they are living on tribal lands or whether they are living in urban indigenous communities like Little Earth in Minnesota, in Minneapolis. Yet they have less access to healthy food, and because of their poverty they, therefore, have less—you know, their health is paying the price.

I know the Secretary has put great emphasis on focusing on customer service, and I would like to hear a little bit from you about what you and the Department are doing to do outreach and education and consultation in tribal communities.

Mr. LIPPS. Sure. Senator, you heard me talk in my opening statement about listening to our customers, and I am happy to say that we have had—I have sat through six tribal consultations since I started this job just over 18 months ago to listen to the needs of the tribes and how we can serve them better. Much of that discussion is about the Food Distribution Program on Indian Reservations, which is very important to the tribes, but certainly they have access to all of these programs that we talked about today, and we want to continue to work with them to make sure that they are increasing the enrollment of the folks who are eligible for those programs and that we are serving them well.

I did tour a tribe in Wisconsin who is doing a wonderful job both with access to programs I do not run on health care but also to our programs on FDPIR and school lunch and the nutrition that they are bringing to their school lunch through farm-to-school programs and other things.

So there is some really good stuff going on in tribes. I think that we can certainly have a conversation about how we do better about bringing access to those tribes in, but these consultations—the FNS staff have regular consultations, and I think we are all trying to move in the same direction. I am certainly open to any further ideas that you have on that.

Senator SMITH. Well, thank you very much. I appreciate your attention to that, and my office would love to work with you more on what we can do to address these deep disparities that are affecting the lives of these kids who are not going to have the same opportunities if they—as you said, as both of you said so well, if you go to school with an empty stomach, then nothing else is going to work in your life.

Mr. LIPPS. Thank you.

Senator SMITH. I want to next ask you about something that is very near and dear to my heart, and, actually, Senator Stabenow brought this up. I think you said 99 percent of the school districts—99.9 percent—

Senator STABENOW. 99.99, for the record.

[Laughter.]

Senator SMITH. Well, in Minnesota, the number is 93 percent of school districts are successfully serving healthy meals that meet the strong nutrition standards that we have set up. What I have seen firsthand visiting schools is a big determinant of that is how important it is that schools have the ability to prepare meals onsite, really healthy meals. This is an area where we still have a lot of work to do in Minnesota. I think 96 percent of school districts in Minnesota are looking for at least one—they have one place where they need to improve their equipment in school.

So I just have a couple of seconds left, but could you talk a little bit about how the Department sees this opportunity and what we can do to make sure that we can help, continue to help schools expand their ability to prepare foods onsite?

Mr. LIPPS. Sure. I do not have the numbers on that, but I know the Department has given out a lot of school meal equipment grants that you have provided over time to schools to help with that, also a lot of technical assistance and guidance on how to use their current equipment to provide those services. You are certainly right about those things, and we continue to work with schools and their constrained budgets about how they move forward with the equipment that they need to prepare the meals that we are asking them to prepare.

Senator SMITH. In Minnesota, my notes tell me it is about \$400,000 that has helped Minnesota schools make this advance. To the point that you raised about you can serve nutritious meals but if all that food gets left on the plate because it is not what kids want to eat because they do not even know what—they do not have any experience eating healthy food, it is a big opportunity. It also creates opportunities for farm-to-school efforts as well, which is another real bonus.

Mr. LIPPS. It is a great program.

Senator SMITH. Thank you.

Chairman ROBERTS. [Presiding.] Thank you, Senator Smith.

Senator CASEY.

Senator CASEY. Thank you, Mr. Chairman.

I will start with my questions for you, Mr. Lipps, and I appreciate your testimony, and Ms. Larin as well.

In your testimony, you described holding roundtable meetings with the WIC community, and we are happy about that. Whenever there is an effort to reach out to individuals or communities af-

ected by the Women, Infants, and Children Program, I certainly appreciate the work you do on that kind of roundtable activity.

Given the immense value of the program from a public health perspective, it is concerning that only 29 percent of eligible 4-year-olds participate in it. That is a 2014 number, but no matter what year it is, it is a bad number.

In your conversations with stakeholders, were there any recommendations made that you can share with us or ideas discussed for how we can ensure that more WIC-eligible children and mothers participate in the program?

Mr. LIPPS. Sure. Thanks for that question, Senator Casey. It has been interesting in these roundtables. You know, WIC participation has been declining steadily since—I think it peaked in 2009, and it has been declining since 2010, and we have had discussions with the advocate community as well as internally at USDA, and we have not been able to pinpoint what the specific issues are with that. There are a number of them—declining birth rates; some of them are obvious.

One of the biggest concerns is what you raised, that children age in the program, they tend to drop off, and so people come on early, but we do not hold on to them. The WIC data shows that one of our best places for improving nutrition is in WIC through that food package. We have good data showing that children respond to that.

You know, there are number of factors. People talk about the process in WIC. If you have multiple children, your State may require you to come in for multiple visits. In some places, it is run a little bit like a doctor's office. You wait in the waiting room. You wait in the clinical room. Then you go to your breastfeeding peer counselor, and you wait again. If you are asking a Mom to do those three things and you want her to be out working, that is not feasible for them.

So I think there are some customer service opportunities in the program, making sure that the food package is accessible to them, but we continue to have discussions with them on that and try to find the right balance of the flexibility we allow the States in running the program but ensuring that we have a Federal policy of making sure that it is accessible to those folks.

Senator CASEY. So maybe streamlining for the customer in a sense might be part of it.

Mr. LIPPS. Yes, sir. I think that is part of what we are looking at.

Senator CASEY. Thank you. I look forward to following up with you on that.

You also mention in your testimony that “47 WIC State, Territory, and Tribal agencies have successfully implemented EBT Statewide and the remaining 43 are in the planning or implementation stage.” Do you anticipate all agencies will meet the October 1, 2020, deadline for implementing WIC EBT?

Mr. LIPPS. The short answer is yes, sir, though there are some challenges. We do have a late-breaking update to my printed testimony. It is now 48 States implemented and 42 remaining. Some States have had some significant challenges with regard to contracting issues and certainly some, like Puerto Rico, with regard to disasters. So we are doing everything we can to provide them tech-

nical assistance to meet the 2020 deadline. At this time we think that everybody is on track to do that, but there are a few that we are watching to try to help them get there through all means available.

Senator CASEY. I appreciate that.

I wanted to ask you more of a Pennsylvania-specific problem or question in this case. We have got 67 counties; 48 of them are considered rural in our State. When they are designated that way, of course, there are consequences to that in terms of Federal programs. Rural communities, as you know, as well as anyone knows, often face both significant barriers and implementation challenges when it comes to the Summer Food Service Program. Senator Stabenow was talking about that. Part of that in rural areas is due to transportation issues or the site or the location of sites where children and families can go.

Could you focus on some of the efforts that the FNS is doing to help rural communities improve access to the Summer Food Service Program?

Mr. LIPPS. Sure. Yes, sir, I agree with all those things that you said and certainly understand the unique challenges of the rural communities. You know, we continue to test new opportunities to serve them through Summer EBT and other programs, and so we will continue to study those and provide that back to you.

Specifically with regard to the Summer Food Service Program, we take a number of actions. We have got a partnership with our rural development agency to help identify sites, and certainly working with the advocate community, there is a big push by some of our partners last summer and particularly this summer about helping to identify sponsors in places where children can congregate and how we get them to those sites in the summer. It is not an easy question or one that we are going to solve soon, but we will continue to do everything we can.

Senator CASEY. I appreciate that. It is just a real tragedy when there is a break in the seam, so to speak, where kids are not getting the help in the summer. Thanks very much.

Chairman ROBERTS. Senator Brown.

Senator BROWN. Thank you, Mr. Chairman. Mr. Lipps, thank you, Mr. Deputy Secretary, for being here, and, Ms. Larin, thank you for being here.

I want to talk about first the importance of the Free and Reduced Price School Lunch Program. Thank you for your work on that. In Ohio, we are concerned, as I know we are everywhere in the country, about the takeup of the number of young people that are not in summer feeding programs. I will save that for last. I want to talk mostly about WIC.

Ohio is 42nd in the country in infant mortality, far too high in maternal mortality also. Twelve percent of babies born in Ohio were born before the 37th week of pregnancy, yet like most of the rest of the country, Ohio continues to see a decline in WIC participation rates. I do not think it can be explained entirely by somewhat lower birth rates and from a growing economy. The growth in the economy has not been in Ohio nearly what it has been in the other parts of the nation but, nonetheless, the national declines in WIC are concerning.

Talk to us about, first of all, just the role WIC plays in helping the Nation lower infant mortality rates.

Mr. LIPPS. Sure. Senator, I do not have specific statistics on that, but the WIC program has positive results all the way around, from pregnant mothers to nutrition for children and for what we provide the mothers through their time in breastfeeding. It has been shown to be a very successful and very supportive program.

Senator BROWN. Can you break down—is there a way to break down effectiveness for WIC programs for infant mortality and WIC programs for premature births?

Mr. LIPPS. I do not know if we have data on that, Senator, but I will certainly check on that and get back with you.

Senator BROWN. Okay. I understand that FNS continues to study WIC caseload declines. The declines have gone on longer than they should have without figuring this out and reversing it.

Talk to me about what steps that you can take to improve program enrollment without undermining program quality. I know you have done recent listening sessions. Tell me what will come of that process.

Mr. LIPPS. Sure. Senator, we are continuing to hold those listening sessions. As you noted, some of the decline in enrollment is good decline in enrollment. It is improvement in the economy. Some of it is reduction in the birth rate, so there are some natural factors in that. What we want to know is, beyond those, what is causing people not to enroll in the program or what is causing them to drop off soon after their children reach the age of 1. We have a continual decrease in the percentage of participation up to age 4 and 5, and so we want to work on that.

You know, we have heard issues about accessibility to the program, how long it takes people to go to the clinic office. A lot of this is flexibility that we provide the States, and so we have to continue to look at balance in providing State flexibility and maybe some national leadership on how we can better serve those recipients.

Technology solutions I think are available, and, you know, we hear some concerns about the food package, but we want to be very careful in that because the WIC food package has been shown to be very effective in increasing the health of the children participating in the program.

Senator BROWN. Thank you for that, Mr. Lipps.

Is there a problem? It seems—when John and I were talking to my staff, there seems to be a bit too Rube Goldberg kind of process to sign up. When you sign up for Medicaid, you sign up for SNAP, you sign up for WIC, often in different places. Is there some effort—I mean, the States should for sure do it better, but is there some effort from the national level to streamline that so that young pregnant women or young mothers or young families can do this a little bit more easily?

Mr. LIPPS. We are always across certainly our 15 nutrition assistance programs but certainly with our Federal partners looked at opportunity for direct certification where, if you qualify with one with the same limits, you can qualify for another, and opportunities where States can share that data. It is complicated with the way the systems and rules are set up, but we continue to work on

that stuff and would certainly be happy to provide you technical advice on that as we see opportunities with CNR coming.

Senator BROWN. There would be a huge number of people that would be eligible. Those States that did not do Medicaid expansion is another question, maybe, but maybe not in some of these. There would be a huge overlap SNAP, Medicaid, and WIC, correct?

Mr. LIPPS. I think that is true, Senator, yes.

Senator BROWN. Okay. Last question. I had mentioned the Summer Feeding Program. We have in Ohio somewhere on any given day about 600,000 children in the Free and Reduced Lunch Program, 700,000 over the course of a year, 600,000 on any given day. Fewer than 100,000 children are fed in the Summer Feeding Program for a whole bunch of legitimate and maybe sometimes less legitimate reasons.

Tell us about the success or potential concerns with non-congregate feeding pilot projects that have been in place for the past several years.

Mr. LIPPS. Yes, sir. I think anytime you can get food to children in need in the summer, we call that a success. There are always a lot of questions around the integrity requirements in those programs. Those are things our friends at GAO and OIG talk to us about regularly, and we look at those things. I think there are opportunities for us to talk about these in the child nutrition reauthorization process about how we feed those kids who cannot get to a congregate site. Summer EBT is one of those options. I think there are others that we can look at. Some people have concern if you send the food off with the kid, do they consume it or do they take it home and somebody else consumes it?

So there are a lot of questions involved in that. We continue to look at some of them, but we all know that we have hungry kids in the summer that need to be fed, and we need to find a path forward on that.

Senator BROWN. That is not a terrible thing if they take it home and feed somebody else.

Mr. LIPPS. It is not. As long as we are feeding somebody hungry.

Senator BROWN. Okay. Thanks.

Chairman ROBERTS. I thank the Senator.

Senator THUNE.

Senator THUNE. Thank you, Mr. Chairman. Thank you all for being here this morning.

South Dakota schools put a tremendous amount of effort into ensuring that the students have the fuel they need to get through the school day, and for some students school meals are the most nutritious part of their diet. Child nutrition programs obviously play a critical role in ensuring that students have access to nutritious meals, and I look forward to working with the members of this Committee as we reauthorize these important programs, hopefully move that legislation this year.

Mr. Lipps, the Healthy Hunger-Free Kids Act of 2010 included an amendment that I added to set aside funding for a demonstration project to be conducted on rural Native American reservations. The goal of the project was to test innovative strategies to address hunger, obesity, and Type 2 diabetes on reservations. Two tribal demonstration projects were subsequently conducted—one by the



Chickasaw Nation Nutrition Services and the other by Navajo Nation Division of Health.

Can you speak to the results of these demonstration projects? Are there ways we can build-upon these projects through this upcoming child nutrition reauthorization?

Mr. LIPPS. Yes, sir, and not unique to some of this other stuff we have been discussing, Senator, there are a lot of opportunities to feed kids in summer, a lot of ways to do that—some challenges with all of them, but certainly some benefits in all of them. So we continue to look at those.

Specifically with regard to the tribal demonstrations that we ran per your amendment, we did have some operational challenges with one of those, which limited the ability for us to get data that we could produce in a steady top manner, but we were successful in getting food out to children in all of these programs. We did learn some good things about some of the programs and their ability to increase consumption of fruits and vegetables and other healthy foods to those kids in the summer.

We have reports on those that I would be happy to share with you. We have had success across the board and want to continue to have discussion with you all about the best way to move forward on feeding more kids in the summer.

Senator THUNE. Well, I would love to see the reports on that and welcome the input as we try and build on that in this current legislation.

Again, for you, Mr. Lipps, as you know, many of the children who rely on child nutrition programs also rely on SNAP. The data has suggested that there is a correlation between the consumption of SNAP benefits and academic performance. Research has found that student performance tapers the farther you get from the date of the SNAP benefit transfer.

Do you have any thoughts on whether granting States the flexibility to modify their SNAP disbursement schedules perhaps to allow 1 month's allotment of SNAP to be distributed in two or three installments each month might boost student performance?

Mr. LIPPS. I think we would be interested in seeing data on that situation, Senator. The SNAP statute prohibits split issuance of benefits throughout the month, but we do have demonstration authority that would allow us to test that. We had a State that attempted to do that previously, and due to systems issues that they had on other issues, they did not move forward on that. Split issuance is a complicated process, but we would surely be open to a State who wanted to test that and see if they could resolve some of the issues that you brought up.

Senator THUNE. Would you see if that—would that enhance the benefit of other child nutrition programs, do you think?

Mr. LIPPS. I think anytime you have folks running out of food early in the month, it can help pull those along so that they are having access to food not only when they are at school or at a CACFP site, but when they get home that they have food as well. So there is certainly some opportunity to see what the results of that would be.

Senator THUNE. Okay. USDA has been working to reduce regulatory burdens in child nutrition programs. Could you comment on the Department's efforts to identify duplicative regulatory burdens?

Mr. LIPPS. Yes, sir. We have done a lot of work on streamlining operations, particularly in summer food service programs, CACFP and those type of programs. We continue to enlist customers on that and are looking at more opportunities on that as we move forward. All of these programs start with paperwork requirements that are important to the integrity of the program. As we run them, we find opportunities to streamline that, and the agency staff are very committed to talking to our operators about how we can serve them on that front and continue to do so. As you know, the Secretary is very committed to a deregulatory agenda.

Senator THUNE. All right. Thank you.

Ms. Larin, school nutrition directors in my State have raised concerns with the added cost and burden associated with USDA's change from the previous 5-year administrative review cycle to a 3-year administrative review cycle for school food authorities. I appreciated USDA's announcement in February that the Department would allow State agencies to request waivers from the 3-year review requirement. How would returning to a 5-year administrative review cycle for schools consistently in compliance affect program integrity?

Ms. LARIN. You know, the cycle time is not something that we have looked at in our work. We have looked at the administrative review process and, when that was initially announced, identified some concerns with the implementation. I think FNS has taken some steps to provide additional guidance and support to make those administrative reviews more effective.

Senator THUNE. Okay. My time has expired. Thank you, Mr. Chairman.

Chairman ROBERTS. Thank you, Senator Thune.

Senator FISCHER.

Senator FISCHER. Thank you, Mr. Chairman.

Mr. Lipps, after speaking with individuals in Nebraska, it has become clear that issues remain in the Competitive Food Sales Program. One repeated concern is that, despite the program being in effect for several years, some districts and States still lack clarity on who is responsible for overseeing compliance at the local level. I do not think State departments want to be the food police at the local level. Frankly, neither do school superintendents.

My second concern is enforcement standards. It is my understanding that States are unclear on how they can enforce these rules. So while this is a confusing program, taking up a lot of time, it stifles some streams of discretionary funding for schools, and there is really no way to ensure people comply.

What guidance has FNS sent to the States and SFAs on this? What does FNS intend to do to address these issues in the Competitive Food Sales Program?

Mr. LIPPS. Thank you, Senator. That is an important point that I do hear when I am out and about on the competitive foods issue. It is difficult. I assure you that I do not want to be the food police either. We do think that there is important balance when we are talking about this program. We want to make sure that our school

lunches have a foundation in nutrition. As you know, the Secretary is committed to providing flexibility on that to make sure that school food service operators have the ability to serve that their kids will eat at their campus. We want to make sure there is balance in that with the other food that is available on campus, and that is really where competition food comes in.

So there is a balance in that, as there is with everything. I am not sure that we are there yet based on what we continue to hear. The agency has done a lot of technical assistance presentations and guidance on that front, both the State agencies and schools, and we are committed to continuing to do that as we move forward.

Senator FISCHER. You say we are not there yet. How are we going to get there? Is it just through presentations to schools, or do you have a different idea on how to make the program really clear?

Mr. LIPPS. We are continuing—you know, the Secretary said when he put out his flexibility standards on whole grain, sodium, and milk, that he was going to continue to listen and look at opportunities if we need regulatory changes moving forward. So that is part of what we are doing now as we continue to look at folks to see if there are regulatory changes that need to be made to make this work, if there is an opportunity for better balance and ensuring that kids are not leaving school lunch to go buy competitive foods elsewhere on campus, but that they are having nutritional standards, but that we are not making the campus or the State be the food police. So we are committed to that balance. I cannot assure you that we have anything coming on that front yet, but we will continue to look at it.

Senator FISCHER. Do you have food service personnel giving you good ideas on how to address some of these issues?

Mr. LIPPS. They do. The Secretary and I have both held roundtables on this front, on all of the issues, and competitive foods does come up. Some folks have asked for more flexibility about what they can serve in competitive food based on what they serve in the food line, and there are complicated details in that. Certainly across that front, nobody is really asking that they be able to serve Snickers bars on the competitive food line. You know and I know that that is not the issue. So we are looking at flexibilities on the margins that might help them on that front.

Senator FISCHER. When you listen to food service people, what are their thoughts on the changes that have been made. Are kids eating lunches? You know, I visit schools all the time across the State of Nebraska. I am curious on what you are hearing.

Mr. LIPPS. Schools are very positive about the flexibilities provided in the final rule. As you know, Congress has provided much of those flexibilities in appropriations acts for quite some time, so it is not a major change. It is just comfort and long-term planning for them. As you know, schools have to buy a long way out to plan their menus in the way that we require them to do. So they are glad to have that finality and flexibility in that. I do think it helps folks. As we talk about the nutrition standards are no good, the calorie—we put a calorie limit in, and the kids do not eat half the food on their plate, then they are getting half of the maximum calories that we provide them, and that is a problem. As you know,

Senator, the same is true particularly with milk and the nutrients that it provides. So we are going to continue to listen and see if further flexibility is needed on that front.

Senator FISCHER. We are pleased that students are drinking milk, and we are pleased they are eating beef. We have a number of ranchers in communities across the State of Nebraska that are providing that to local school district.

Also, Mr. Lipps, when speaking to individuals in my State who are currently using CEP, they seem to believe that it is to their benefit and that there has been a slight reduction in administrative costs. Some districts are wary about whether it would alter their State aid formula in the State of Nebraska, the aid they receive from the State of Nebraska.

Is this a nationwide concern? I know this program was a topic of debate during the last reauthorization process, so I guess I am just wondering why are schools not adopting the program, and what does the agency see as pros and cons?

Mr. LIPPS. Sure. I have not heard that specific State aid issue. I will talk to my folks, and we will get you additional information on that. Certainly as with any of the flexibilities in administrative issues, there are benefits and drawbacks on that front. CEP is a great opportunity at reducing administrative burden and ensuring that all kids in need have access to those programs. I think it is always important to mention that schools cost-share in the CEP, so when a school becomes a CEP school, we are not paying the full share for all of those students as there are some in who are not low-income to receive those benefits.

We will continue to work on that as we move forward. CEP is an ongoing discussion about the right path forward on that front.

Senator FISCHER. Thank you, sir.

Thank you, Mr. Chairman.

Chairman ROBERTS. We thank you, Senator Fischer. The distinguished Senator from Illinois, Senator Durbin.

Senator DURBIN. Thank you very much, Mr. Chairman. It is a pleasure to be here. Thank you to the witnesses.

For more than 20 years, the State of Illinois has operated a unique program that provides affordable assisted living to low-income seniors and persons with disabilities. These supportive living facilities create a healthy environment for seniors and those with disabilities who are on Medicaid. There are roughly 150 of these senior living facilities in Illinois. About 8,000 people take advantage of them every working day.

To serve these seniors and residents with disabilities, the facilities use their residents' SNAP benefits to serve meals. In other words, they pick up their food stamps, buy some macaroni and cheese, play bingo, and have a great day.

For 20 years, the United States Department of Agriculture has approved this model, certifying these facilities to administer the SNAP benefits for the residents so that those who qualify for nutrition assistance can have a good warm meal with their friends.

Now all of a sudden, the U.S. Department of Agriculture thinks there is a problem, maybe even a scandal, and these facilities are out of compliance. Never mind that the USDA recertified these facilities as recently as 2016 and reported no problems.

I worked with Senator Duckworth, my colleague from Illinois, Ranking Member Stabenow, and Chairman Roberts. We were able to stop the U.S. Department of Agriculture from administrative overreach for 18 months in the farm bill. We have looked at the rules and statutory definition of “food” under SNAP, and I think the U.S. Department of Agriculture has found the wrong scandal. In fact, I think there is no scandal. To put it simply, you are missing the point. People are just trying to feed 8,000 needy people who can get together for lunch in a supportive facility.

So I am going to ask for some commitments from you, which I think are reasonable and I hope you can answer with yes or no, if it is appropriate. After the expiration of the farm bill’s 18-month freeze on any SNAP terminations for these facilities, will you commit that the USDA will work with the residents, the facilities, the Illinois Department of Human Services, Senator Duckworth, and myself to provide adequate notification prior to any de-authorization?

Mr. LIPPS. Yes, sir.

Senator DURBIN. Is there no question that these 8,000 disabled and elderly people are eligible for SNAP? No matter what happens at the end of 18 months, will you ensure the continuity of SNAP benefits for these 8,000 seniors?

Mr. LIPPS. Yes, sir.

Senator DURBIN. That is good. Thank you, Mr. Chairman.

Chairman ROBERTS. Thank you to our first panel, and I appreciate your testimony. We really appreciate your expertise and your commitment. Well done to both of you. I would like to welcome our second panel of witnesses before the Committee.

Our first witness is Mr. Josh Mathiasmeier. He has been the director of nutritional Services for Kansas City, Kansas, Public Schools since 2014. Prior to this role, he was a project director for the Kansas Department of Education, Child Nutrition, and Wellness team. He is a fellow graduate of Kansas State University, home of the ever optimistic and fighting Wildcats, and he has degrees in nutrition, kinesiology, and dietetics. He is a registered dietitian.

Welcome, Mr. Mathiasmeier. I am sorry I messed that up. Welcome, Josh, and I look forward to your testimony.

**STATEMENT OF JOSHUA MATHIASMEIER, DIRECTOR OF NUTRITIONAL SERVICES, KANSAS CITY, KANSAS PUBLIC SCHOOLS, KANSAS CITY, KANSAS**

Mr. MATHIASMEIER. Good morning, Chairman Roberts, Ranking Member Stabenow, and Committee members. Thank you for inviting me to speak today and for your interest in making sure students have access to healthy meals impacting students’ success. I am honored and privileged to represent Kansas City, Kansas, Public Schools, the State of Kansas, and all food service professionals who are some of the most passionate and hardworking in this country.

Child nutrition programs provide a strong safety net for our children by ensuring their nutrition needs are met while also providing nutrition education. As a part of our core principles, we strive to

provide our students with high-quality food and excellent customer service.

In all sections of business and industry, the 21st century student requires innovative approaches to encourage healthy choices. Through the use of innovative meal programs, we are able to increase the quality and variety of our offerings while appealing to the unique needs of today's students.

We utilize innovative approaches in our School Breakfast Program by offering Grab and Go and Breakfast in the Classroom. By hosting breakfast meal service in the classroom or near building entrances, we are able to increase access to healthy meals and incorporate the breakfast meal into the school day.

We also know that hunger does not stop after the school day or at the end of the school year. This is why we offer after-school snack, supper, and summer meals to our students. The snack and supper meal is incorporated into the after-school event or activity and must include an educational or enrichment component. We bridge the gap during the summer by offering meals at sites such as pools, schools, libraries, community centers, parks, urban farms, community colleges, farmers' markets, and community housing complexes. By bringing the meals to where children already are, we remove barriers of access to healthy meals.

Since we operate so many different child nutrition programs, we must adhere to all USDA regulations for each program. While many of these regulations are the same, there are several differences between programs which makes it challenging to streamline for efficiency. This also causes a great deal of confusion to operators who administer multiple programs. We encourage USDA to review these differences between programs and create consistency in child nutrition programs.

As a part of operating child nutrition programs, we receive regular accountability and compliance reviews. We fully understand the need for the compliance and accountability of any federally funded program. Compliance and oversight ensure that each child has access to healthy meals impacting students' success.

We are overwhelmed with the amount of administrative time and effort it takes to prepare for and compliance child nutrition program reviews by the State agency. In addition to State agency reviews, we are required to complete onsite monitoring reviews for each program. The reviews completed by the State agency and operators at the local level often overlap, with visits being completed multiple times at the same site for different child nutrition programs. We ask USDA to simplify and streamline both the review process by the State agency and the onsite monitoring reviews by program operators.

We strive to meet the individual needs of our customers with their unique background and demographics. The customers we serve in Kansas City are unlike any group of customers in surrounding school districts. It is important for us to remain focused on the needs of our customers through local control of food, equipment, supplies, and resources. Through local control, we are able to stay nimble in meeting the constantly changing needs of our customers. We encourage USDA to continue giving local control for the many decisions that impact our customer's unique needs.

Schools are a leader in culture change, instilling healthy habits for a lifetime. We have a passion for making sure students have access to healthy, safe, and high-quality meals. The child nutrition reauthorization act, known as the Healthy Hunger-Free Kids Act of 2010, provided historic changes in child nutrition programs and gives students healthier meal options. Implementation has resulted in increased consumption of fruits, vegetables, and whole grains.

We encourage USDA to ensure we can efficiently and effectively serve students these meals because they are critical to their life-long success.

Thank you, Chairman Roberts and Committee members, for your interest in ensuring our children have access to healthy meals, and I am happy to answer any questions. Thank you.

[The prepared statement of Mr. Mathiasmeier can be found on page 67 in the appendix.]

Chairman ROBERTS. Thank you, sir. Thank you for being on time.

Mr. Halligan, you have already been introduced by our distinguished Leader. Why don't you just proceed.

**STATEMENT OF MICHAEL J. HALLIGAN, CHIEF EXECUTIVE OFFICER, GOD'S PANTRY FOOD BANK, LEXINGTON, KENTUCKY**

Mr. HALLIGAN. Thank you, Mr. Chairman. Thank you for the invitation to attend today's hearing. As you know, I am Mike Halligan, CEO for God's Pantry Food Bank in Lexington, Kentucky. Today I am honored to testify on behalf of more than an estimated quarter of a million food-insecure Kentuckians, including nearly 72,000 hungry children who reside in central and eastern Kentucky.

My remarks will address the critical role Federal after-school and summer feeding programs play in addressing childhood hunger. That said, I in no way intend to diminish the importance or the significant impact of many other nutritious food and meal programs that assist families with children in daycare and school or pregnant women, infants, and toddlers.

Let us begin by acknowledging, as we have this morning, that it is never a child's fault that they are hungry. Congress needs to make policy changes under a two-part strategy to more effectively reach children during the summer, after school, and on weekends.

First, we need to strengthen the site-based model by streamlining Federal programs to expand the number of sites that are available to children. To do this, we recommend community providers be able to operate one program year-round through the Summer Food Service Program, and that area eligibility requirements used by at-risk sites be changed from 50 percent to 40 percent, like other Federal aid programs.

Second, we need to allow the use of alternate program models to fill gaps where children cannot otherwise access a meal, modifying, not replacing, the congregate feeding requirement and utilizing an efficient summer grocery card. One complex challenge involves duplicate and inconsistent rules and regulations. God's Pantry Food Bank utilizes two Federal child nutrition programs: the Summer Food Service Program and the Child and Adult Care Food Program under the after-school provision. Simply put, two categories: sum-

mer regulations and school-year regulations. Often, we are feeding the same children in the same location, so one would think we would operate under the same guidelines. The rules for one do not always apply to the other. The paperwork is different. The nutrition requirements are different. The reimbursement rates are different. The training is different. Needless to say, it gets very confusing. Why not have a program with one set of rules and regulations to complement the National School Lunch Program for both summer and after-school meals?

A public library serves as a summer site in one Kentucky county. Children eat onsite. The library then packs additional lunches into a mobile bookmobile and drives to a low-income housing area. At this second site, there are no picnic tables or park benches. So on a hot, summer day or, heaven forbid, during a thunderstorm, the children must stand or sit on the ground in the vicinity of the mobile unit to ensure the meal is consumed on premise in front of supervising staff.

There is a child with a physical disability who lives in the apartment building. Unfortunately, that child is not eligible for a Summer Food Service Program meal. The librarian instead has to pack a separate, non-reimbursed meal for the child, and the child's sibling takes that separate meal to him because he cannot leave his apartment to congregate!

If regulations were modified, the child would receive a reimbursed meal; the other children would sit in the shade of their own porch; and the bookmobile would have the time to travel to other locations to deliver additional meals. This two-part strategy will effectively reach more children who need meal assistance after school, in the summer, and on weekends.

Providing opportunity for all of our Nation's children requires investing resources to increase access, particularly during times when children are out of school. Simply making a small, incremental change to programs is not enough. Many of these recommendations have been successfully applied in numerous demonstration projects. The time has come to apply these learnings across our beloved Nation.

I encourage the Committee to strengthen child nutrition programs through reauthorization, helping to end hunger in this country.

I will close with a final thought that is forever etched in my mind. I was at an after-school kids' café program at a local Boys and Girls Club. A student, who I will simply call "K," approached and handed me a small framed drawing of a slice of buttered toast. I smiled, saying, "Thank you." The reply was, "No. Thank you. Because of the food you help me get, I am not as hungry and I do better in school." Leave it to the mind of a child to help one clearly understand the need.

It is humbling to testify today on behalf of "K" and here is the picture. Thank you.

[The prepared statement of Mr. Halligan can be found on page 70 in the appendix.]

Chairman ROBERTS. Thank you, Mr. Halligan. Thank you for your pertinent suggestions and advice. All of your advice is—all of



your statements will be made part of the record. I want to assure you of that. Now, that is a piece of toast, as I understand it?

Mr. HALLIGAN. Yes, sir. It is a piece of buttered toast.

Chairman ROBERTS. Buttered toast.

Mr. HALLIGAN. "K" was 6 years old.

Chairman ROBERTS. What is that in the middle of the toast?

Mr. HALLIGAN. That is the slab of butter.

[Laughter.]

Chairman ROBERTS. I thought it was a mushroom.

Mr. HALLIGAN. It took me a while to figure out what it was, too. Like I said, leave it to the mind of a child to help one clearly understand what we need to do.

Chairman ROBERTS. Right. We are a little pressed for time in that we have votes at 11:45, so let us proceed.

Our next witness, Lauren Waits, has more than 20 years of experience with maternal and child health issues in Atlanta, Georgia. Ms. Waits is the current director of government affairs for the Atlanta Community Food Bank, where she focuses on SNAP and WIC issues. She formerly conducted policy research for the Georgia Health Policy Center at Georgia State University and is a graduate of the Harvard School of Public Health. Welcome, Ms. Waits.

**STATEMENT OF LAUREN WAITS, DIRECTOR OF GOVERNMENT AFFAIRS, ATLANTA COMMUNITY FOOD BANK, ATLANTA, GEORGIA**

Ms. WAITS. Chairman Roberts, Ranking Member Stabenow, and members of the Committee, thank you for this chance to tell you about the work we are doing in Georgia to increase enrollment and participation in the WIC Program. I represent the Atlanta Community Food Bank, which provides more than 61 million meals a year through 600 partner agencies to over 755,000 in metro Atlanta and northwest Georgia.

I also represent the Georgia WIC Working Group, a partnership between government, philanthropic, business, and nonprofit stakeholders working together to increase WIC enrollment and participation. Georgia was one of the first States to offer universal pre-K, and our then-Governor, Sonny Perdue, created the first State-level Department of Early Care and Learning. Georgia makes significant investments in early childhood programs, and we have a thriving quality rated child care system.

Nonetheless, about one in five Georgia children do not always have enough to eat. Our food bank supports a range of community partnerships with schools, after-school, and summer meal providers because we want children to make full use of the healthy meals available through Federal nutrition programs. We could not ignore the fact that WIC participation has been declining in Georgia as it has across the country.

With the support of the WIC Working Group and with funding from our donors, the Atlanta Community Food Bank hired an independent market research firm to conduct a series of focus groups with families who were eligible but not enrolled in the Georgia WIC Program in October 2017.

The focus group discussions explored many aspects of contemporary family life and ideas about WIC. We found that even non-

participating families have positive perceptions of WIC, and they were most familiar with the fact that WIC helps pay for infant formula and milk. Not all are aware of additional food benefits like fresh fruits and vegetables, nor did all families realize that WIC provides nutrition education. The elements make the program more attractive for families who are unfamiliar with it.

Mothers, fathers, and grandparents all confirmed that food insecurity is a real and familiar threat in their lives. Most of the families had a story about a time when they did not know how they were going to pay for the food they needed, and some said that WIC played a crucial part in preventing them from facing that crisis.

Families discuss some of the reasons they are not currently enrolled in WIC. Both in the WIC clinic and at the grocery store, participants need to make good use of their time. If a new mother is taking time off work and forgoing pay, as has been mentioned, to bring her baby to the clinic, she literally cannot afford to wait too long there. Voucher delays in the checkout line or difficulty identifying WIC-eligible foods throughout the store can also make parents decide the benefit might not be worth the effort. However, these families are online, usually through smartphones, and they are actively seeking information to help them raise healthy kids. They are very comfortable using technology to enroll in all sorts of activities, and they would be excited about digital WIC apps that help them to get certified, receive nutrition, and fulfill other program requirements. Some States do already have these technologies in place. Georgia does not yet.

We are aware of several WIC policy recommendations that national advocates have suggested. Our experience in Georgia strongly supports them.

No. 1, please keep WIC accessible to as many low-income mothers and children as possible. WIC is a powerful factor in helping the women we serve have safer pregnancies, have fewer premature births and infant deaths, and it is supporting positive health outcomes for infants and children, especially lower obesity rates, and improves school performance. It prevents food insecurity. Groups like ours can help to support outreach and enrollment in WIC, but we need you to make sure its broad availability continues.

No. 2, we support extending certification periods and lifting the age of WIC coverage. Georgia families told us it is hard to keep their kids certified while juggling work and other family demands. We ask that you allow families to maintain their connection to WIC for longer periods and reduce unnecessary certification barriers. We also support extending WIC coverage to older children, for example, up to age 6, so that children who may not yet be enrolled in school continue to have access to nutritious foods.

No. 3, we ask that the new legislation include measures to promote cross-enrollment between WIC and other programs that benefit kids like SNAP and Medicaid. The Georgia WIC Working Group has pushed for comparison of Medicaid and WIC participation rates, and new technology systems allow us to evaluate successes more quickly and easily than ever before. Performance metrics must be a requirement in order for them to be a priority.

On a personal note, I would just like to share that I am an adoptive parent whose child was nourished by her birth mother and the WIC program until we could feed her ourselves. I am grateful for the existence of WIC, and I witness its benefits to my vibrant, healthy daughter every day.

Thank you for your work on all these important programs. I would be happy to answer questions.

[The prepared statement of Ms. Waits can be found on page 81 in the appendix.]

Chairman ROBERTS. We thank you very much.

Our next witness, Kati Wagner, is the current vice president of the National Child and Adult Care Food Program Sponsors Association, which is based in Round Rock, Texas. She has served on their board of directors since 2012 as both secretary and treasurer. Ms. Wagner has been the president of the Wildwood CACFP in Centennial, Colorado, since 2009. Welcome. We look forward to your testimony.

**STATEMENT OF KATI WAGNER, VICE PRESIDENT, NATIONAL CACFP SPONSORS ASSOCIATION, ROUND ROCK, TEXAS**

Ms. WAGNER. Good morning. Chairman Roberts, Ranking Member Stabenow, and Committee members, thank you very much for allowing me to testify today for the very first time.

My name is Kati Wagner, and I serve as the vice president and policy chair for the National Child and Adult Care Food Program Sponsors Association, or NCA. We are a national association whose mission it is to support the hundreds of thousands of people who make up the USDA Child and Adult Care Food Program community, the CACFP, which includes sponsoring organizations, family child care homes and centers, Head Start, after-school at-risk sites, and adult daycare facilities, as well as State agencies, anti-hunger advocates, and industry supporters.

As president of the sponsoring agency for the CACFP, I personally work with each of those groups in Colorado and with family child care homes in Wyoming. Today it is my honor to share an overview of the CACFP, often referred to as “the food program.”

The CACFP is part of the Richard B. Russell National School Lunch Act. Though smaller than the School Lunch Program, current appropriations serve about 4.5 million children per day and 2 billion meals per year. CACFP provides funding to child care facilities (homes and centers), after-school programs, homeless shelters, and adult daycare facilities as reimbursement for serving healthy foods to those in their care. Funding not only improves nutrition for the children and older adults when parents or caregivers are working; it helps small businesses offset the higher cost of serving healthier food, while parents are allowed to work and have access to quality child care. This program is one of the best examples of a public-private partnership, improving children’s lives and supporting working families while boosting local economies.

CACFP is a multifaceted approach to feeding food-insecure children through various settings. One avenue of participation is with a sponsoring organization. This is the only way that licensed family child care providers can participate in the food program. Family home sponsoring organizations are nongovernmental, nonprofit or-

ganizations which are responsible for maintaining program integrity by making frequent onsite visits to the child care home, offering training, support, and oversight.

As a sponsor, my organization visits the child care provider's home at least three times a year to verify children are in care and that the meals being served meet with USDA meal pattern requirements.

With the remainder of my time, I would like to tell you about a family child care provider enrolled in the CACFP from Cortez, Colorado. Many of the resources that I will be referencing will be found in my written testimony.

Meet Mickey. Mickey's children arrive between 7 and 8 o'clock every morning. Their day starts with a healthy breakfast of oatmeal, strawberries, and a glass of milk. Her kitchen walls are covered with USDA Team Nutrition posters showcasing fun, healthy nutrition ideas, USDA's MyPlate poster, and NCA's motivational posters, as well as her children's art work. After breakfast, the children have circle time playing and learning about colors and shapes until their morning snack of carrot sticks and watermelon slices. Next, they go outside, even in the Colorado winters, for physical activity time playing games they have learned from the NCA Program Calendar until it is time for lunch.

So today at Mickey's, they are having baked chicken breast, broccoli trees, apple slices, a whole grain-rich roll, and a glass of milk. Mickey's parents do not pick up their children until 6 or 7 p.m. so she provides an afternoon snack of orange wedges and graham crackers as well dinner, which includes whole grain-rich spaghetti, tomato sauce, tossed spinach salad, garlic bread, and milk. Mickey is only reimbursed for two meals and one snack through the CACFP each day, but she provides all of the meals to the children in her care because eight out of ten people in her area are food insecure. The last time I was in her home, she was explaining to me how grateful she is for the support she receives by participating in the CACFP under a sponsoring organization. The program allows her to serve more nutritious food, to keep enrollment fees down. On Monday mornings, Mickey serves two to three times the amount of food for breakfast she normally would because the children come in so hungry.

Across the country millions of children are being served by providers or small business owners just like Mickey. We have included more stories about providers in our written testimony. This Committee has an important opportunity in 2019 to improve the health of our Nation's children by passing a strong child nutrition reauthorization that protects and strengthens all child nutrition programs. These successful, cost-effective Federal nutrition programs play a critical role in helping children in low-income families achieve access to child care and educational and enrichment activities while improving overall nutrition, health, development, and academic achievement.

We are very excited that reauthorization is back on your table. It has the ability to change what is on the table for 4.5 million children each day. As the national association for providers, meal sponsors, and front-line users of the CACFP, we are eager to share suggestions that we believe would improve the CACFP. Most of the

program improvements we are suggesting do not represent any increase in cost to the program but would create efficiencies and reduce barriers to participation.

Thank you for your support of the CACFP and our Nation's most vulnerable populations, and I will be happy to answer any questions you may have.

[The prepared statement of Ms. Wagner can be found on page 91 in the appendix.]

Chairman ROBERTS. We thank you.

Senator STABENOW.

Senator STABENOW. Well, thank you to all of you for your really important testimony, and last but not least, we have Dr. Lanre Falusi. Welcome. She is a pediatrician and associate medical director at the Child Health Advocacy Institute, part of Children's National Health System here in Washington, DC. She is also a past president of the American Academy of Pediatrics D.C. Chapter. She attended medical school at the University of Virginia, and I have to tell you I wish Michigan State had been the one playing you on Monday night.

[Laughter.]

Senator STABENOW. I was looking forward to that game, but congratulations.

She completed her residency and chief residency at Children's National. We want to thank you for being here, and we look forward to your testimony.

**STATEMENT OF OLANREWAJU (LANRE) FALUSI, M.D., PEDIATRICIAN, CHILDREN'S NATIONAL HEALTH SYSTEM, AND PAST PRESIDENT, AMERICAN ACADEMY OF PEDIATRICS D.C. CHAPTER, WASHINGTON D.C.**

Dr. FALUSI. Chairman Roberts, Ranking Member Stabenow, and members of the Committee, thank you for the opportunity to testify here today. I am Dr. Lanre Falusi, as you heard, a pediatrician at Children's National Health System here in D.C. and past president of the D.C. Chapter of the American Academy of Pediatrics, or AAP. On behalf of the AAP and our 67,000 members, thank you for holding today's hearing.

As a practicing pediatrician, I see firsthand the health effects of food insecurity and malnutrition in my patients. I also see the positive impact that Federal child nutrition programs have had on reducing food insecurity and promoting access to healthy, nutritious foods in my patients. These are programs such as the National School Lunch Program and School Breakfast Program, the Child and Adult Care Food Program, the Summer Food Service Program, and, of course, WIC.

In fact, I credit WIC for the health of my patient, who I will call "David," whose developmental delays at 3 years of age made it very difficult for him to chew solid foods. His family was also experiencing food insecurity. David was really struggling, underweight, and with poor developmental skills when I first met him. We got him connected to regular visits at WIC, which was our clinic, and provided him with a special high-calorie milk and balanced diet with fresh fruits and vegetables, which took an enormous stress off of his mother. She could now be sure that her son is not going hun-

gry, and he is able to focus on learning fine motor and cognitive skills. David is now thriving and has reached a healthy weight. His success and so many others like him highlights the importance of connecting families who are experiencing food insecurity with key Federal programs so that children can reach their highest potential.

Maternal prenatal nutrition and the child's nutrition in the first 2 years of life are crucial factors in a child's neurological development and lifelong mental health. Child and adult health risks, including obesity, hypertension, and diabetes, may be programmed by nutritional status during this critical period.

Research has documented the adverse effects of food insecurity on the health, growth, and development and even educational outcomes of children from infancy through adolescence. Among school-aged children, food insecurity is associated with lower math and reading scores, hyperactivity, and absenteeism and tardiness at school. Children from food-insecure households have poorer overall health and more hospitalizations than do children who live in food-secure households.

When my patients screen positive for food insecurity, I refer them to Federal child nutrition programs, and I counsel families on healthy food choices. However, for many of my patients, fruits and vegetables, whole grains, and low-sodium foods are unaffordable, unattainable, or they lack the ability to prepare them. In fact, for some of my patients, the only meals they get each day are from the Federal school nutrition programs.

That is why it is critical that we set students up for success by building on the programs made under the Healthy Hunger-Free Kids Act, to improve the nutritional quality of school meals, and to ensure snack foods and beverages sold in schools are healthy and nutritious as well.

Stigma, administrative burden, and increasingly fear serve as barriers to children's participation in Federal nutrition programs. The Community Eligibility Provision, or CEP, is a vitally important for high-poverty schools to ensure that all of their students have access to healthy school meals while eliminating the traditional school meal application process. I applaud this Committee for creating CEP, and I urge you to maintain and protect this option for schools.

One of the most effective investments Congress can make during childhood is to support and reduce barriers to accessing WIC. Children who receive WIC have improved birth outcomes, increased rates of immunization, and better access to health care through a medical home. WIC also plays an important role in promoting breastfeeding through the successful breastfeeding peer counseling program.

I am concerned, however, that many of my patients who start out on WIC as infants do not remain connected to the program. Giving States the option to eliminate recertification at age 1 would ease the administrative burden to participation. Similarly, extending WIC eligibility to age 6 would address the age gap for children who have not yet started kindergarten.

Children need optimal nutrition year-round. Countless children go without access to food during out-of-school or child care time, es-

pecially in the summer months. We must do more to reach more children with nutritious meals and snacks in all of these settings.

Good nutrition in pregnancy and childhood is a foundation for lifelong health. Just like we vaccinate to protect against illness, so too can we provide pregnant women and children with nutritional assistance and breastfeeding support to promote healthy development and protect against food insecurity and chronic disease.

Thank you for the opportunity to testify here today.

[The prepared statement of Dr. Lanre Falusi can be found on page 124 in the appendix.]

Chairman ROBERTS. Thank you very much.

I am now going to recognize Senator Casey with the admonition that we are voting at 11:45 and that there may be somewhat of a time concern here. So the Senator is recognized.

Senator CASEY. Thank you, Mr. Chairman. This is unprecedented. This has never happened before that I was recognized this early, and I am grateful for that, so I am going to keep within my time.

Doctor, I want to start with you. There has been much discussion in Pennsylvania about the ability of schools to serve whole milk to students. My question for you is: What does the science tell us about the appropriate levels of whole milk consumption?

Dr. FALUSI. Thank you for the question. As a pediatrician, I recommend to my patients that they drink water or low-fat or fat-free milk. We know that milk has many benefits from protein, calcium, and vitamin D. We also know, though, that lower fat and lower sugar in diets are healthier for children. So what we would admonish from the American Academy of Pediatrics is that the standards for school nutrition programs, including the type of milk, should really be based on the science, and the science being that lower fat and lower sugar are what we should be advocating for children. We do encourage the USDA to utilize nutrition experts and to look at a number of studies for those guidelines.

Senator CASEY. Thank you.

I will move to Ms. Wagner. The last time this Committee considered reauthorization of the child nutrition programs, I introduced the Access to Healthy Food for Young Children Act. This legislation proposed a number of improvements to the Child and Adult Care Food Program, including reducing the area eligibility test and allowing for a third meal service. I intend to once again push for those improvements to the program.

Could you provide an example of low-to no-cost modifications to the program that could both increase participation as well as improve outcomes?

Ms. WAGNER. Yes, thank you for asking the question. One of our top priorities after we surveyed all of our members of the association was that we limit add-ons by the State agency in the USDA regional offices. We work very well with the USDA national office, but we have found that the regional offices and the State agencies continue to add on additional regulations, and this is creating a huge barrier to participation. So that was actually our No. 2 priority.

Senator CASEY. That is helpful to help us make the case in this process. What we are trying to do with the legislation is to make

both more child care providers who serve low-income children eligible for higher Tier 1 reimbursement and also help many more children in need receive the healthy meals and snacks that the program provides. So we are grateful for your leadership and also grateful for the example you gave us.

Mr. Chairman, I will just conclude with one statement. I know I have got more time, but in the interest of the vote and everything else, John Kennedy in his inaugural address said a lot of great things. We always quote him. One thing that he said that I think binds public officials together, no matter what party, is the line where he said, "Here on Earth, God's work must truly be our own." I appreciate the panel's work to bring reminders to us about what is God's work. So thanks very much, Mr. Chairman.

Chairman ROBERTS. Thank you, Senator.

Senator BOOZMAN.

Senator BOOZMAN. Thank you, Mr. Chairman. Very quickly, I want to apologize for not being here during the vast majority of the meeting. I had a markup on Environment and Public Works. They needed me for a quorum. We had all of the generals that control the Reserves and the National Guard. I just left the hearing with Attorney General Barr. So a lot is going on all at the same time.

On the other hand, I would say that this hearing is as important as any, and I applaud the Chairman and Ranking Member for having it. I want to thank the panel. I also want to thank all of you that are so interested in this. This is going to take all of us working together to get done. It is so, so very important. It is something that we can get done this Congress, and we do not have anybody being better leaders than these two as far as pushing things forward. They have got a great track record in a very bipartisan way of getting things done.

So I look forward to working with all of you, and like I said, this is something that we can and will get done this Congress.

Thank you.

Chairman ROBERTS. Well, I truly appreciate your statement, Senator Boozman.

Senator Stabenow, and the vote has started, by the way.

Senator STABENOW. Thank you very much. I have questions for everyone, and because of the vote, I will submit most of these for the record and ask for your comments.

Thank you to all of you. Each of you are doing incredibly important work, and we just need to do everything we can to support you in that, and we will.

Just a couple of questions that I have, one for Mr. Mathiasmeier. Thank you for the work that you are doing in Kansas City. It is very exciting, when I was listening to you speak of all the ways you are doing outreach for children and schools. You mentioned the importance of the Community Eligibility Provision. If community eligibility were eliminated or if how schools can qualify was restricted, can you describe what this would do to your students and the administration of the program?

Mr. MATHIASMEIER. Sure. So if the Community Eligibility Provision was abolished or not available anymore, we would have less access—or children would have less access to meals. I can guarantee you that less of them would participate. There would be more



barriers between kids that really need our programs and their ability to consume our meals. So I would be very concerned about the access that kids have to healthy meals.

Senator STABENOW. Thank you. I share that as much as well.

Dr. Falusi, thank you again for being here. Your testimony describes how collocating WIC clinics with your office improves the client's experiences and makes sure they are connected to health care service in addition to good nutrition. Based on your experience, what else can we do to reduce barriers and improve the WIC program and the experience for moms and babies?

Dr. FALUSI. Thank you for that question. So, absolutely, being able to walk that family out of the exam room and down the hallway to the WIC clinic has been crucial for us in ensuring that those families really have access to healthy nutrition.

Other things as we have heard today, maintaining the Community Eligibility Provision so that schools and families do not have to have onerous paperwork every year, additionally maintaining the adjunctive eligibility with Medicaid and WIC is crucial toward reducing the administrative burdens and ensuring that families do not have to spend their precious time, particularly our low-income families who have limited time with work, to really go through the paperwork just to maintain their access to healthy foods. We would advocate for those programs.

Senator STABENOW. Thank you very much.

Senator STABENOW. Thank you, Mr. Chairman. The show of the ultimate trust I have for the Chairman, I am going to be leaving now to go to the vote and leaving him in charge.

[Laughter.]

Senator STABENOW. So, you know, make sure he is okay here. Thank you, Mr. Chairman, for your leadership, and thank you to all of you.

Chairman ROBERTS. Well, thank you for that trust. I appreciate that very much.

I want to emphasize that all statements that have been made by you—and thank you so much for your statements. All will be in the Committee record. All of the statements will help us in the Committee move through the process of reauthorization. It is a tough path, especially given the circumstances today with legislation in both Houses. I am optimistic we can do that. All statements will be available to the Department of Agriculture for their study and also for response. So simply because I am asking you one question, do not even—just do not worry. Your statements are part of the record, and we really appreciate them.

To the panel, each of you, we have 105 counties in Kansas, so I am saying about all of them except 5 are pretty much rural. Out west, it is all rural. Can each of you provide an example of potential program improvement such as flexibility that would allow you to better serve or provide access to people in our rural areas? We will start with you, Josh.

Mr. MATHIASMEIER. That is a great question, Chairman. I think the Summer Food Service Program congregate meals requirement is something that has a huge impact on rural Kansas, but also in the Kansas City area, we have families that live a block, a mile, 2 miles away from a summer food program and they just cannot

get there. So the congregate meals is definitely something that could be looked at.

Chairman ROBERTS. Mr. Halligan, you touched on that as well.

Mr. HALLIGAN. I did. You know, I think relaxing—again, not eliminating, relaxing the congregate meeting requirement or congregate feeding requirement certainly allows us to access more individuals where they live. It is about bringing the food to people rather than bringing the people to food.

The second thing I would add is the notion of a summer grocery card. I was born and raised in Iowa, and the transportation distances simply to get to a grocery store let alone a site are pretty dramatic. My wife would plan—her family would plan their weekend around a grocery shopping trip. So I think an EBT for summer feeding for children is a very powerful tool that will help rural families in particular.

Chairman ROBERTS. Thank you.

Ms. Waits?

Ms. WAITS. For WIC, extending the certification period for young children so that families do not have to go on such a frequent basis to the WIC clinic, there are other ways to fulfill their nutrition education requirements, but keeping those rural families on WIC for a longer period of time will allow them to make better use, more extended use of the benefit.

Chairman ROBERTS. Thank you.

Ms. Wagner?

Ms. WAGNER. Yes, sir. So currently the at-risk after-school program can only run during the school year, and then Summer Feeding kicks in. I think a great way to increase participation is to consider allowing both programs to go year-round. In some areas of the country, we have an incredibly strong at-risk program and a very small, if any, Summer Feeding Program. So these children just go the summer without eating. Then the same thing, we do not have at-risk after-school programs in all areas of the country where summer food is very, very strong. So that might be a way to increase participation by allowing one or the other—or both to go year-round and then people can choose whether it be at-risk or summer food.

Chairman ROBERTS. I appreciate that very much. Thank you.

Chairman ROBERTS. Dr. Falusi?

Dr. FALUSI. I would echo what all of my panelists have said. In addition, with WIC, along with increasing the certification beyond 1 year, also increasing the age up to age 6 will increase the eligibility for kids and access. We find that there are children who reach the maximum age of 5 for WIC, but have not yet started kindergarten, and will have up to a year of poor nutrition. As we know, early nutrition in those years is critical to their ongoing educational outcomes.

Chairman ROBERTS. We thank you all. That will conclude our hearing today. Thank you to each of our witnesses for taking time to share your views on these important programs and what to consider in child nutrition reauthorization. The testimonies provided today, as I have Stated, are extremely valuable for the Committee to hear firsthand, and we all appreciate that.

To my fellow members, we ask that any additional questions you may have for the record be submitted to the Committee clerk 5 business days from today, or 5 p.m. next Wednesday, April 17th.

The Committee is adjourned. Thank you.

[Whereupon, at 11:58 a.m., the Committee was adjourned.]



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**A P P E N D I X**

APRIL 10, 2019

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Senate Committee on Agriculture,  
Nutrition and Forestry

**Statement of Brandon Lipps, Acting Deputy Under Secretary,  
Food, Nutrition and Consumer Services, Administrator, Food and Nutrition Service  
United States Department of Agriculture**

**Before the Senate Committee on Agriculture  
April 10, 2019**

Thank you Chairman Roberts, Ranking Member Stabenow, and Members of the Committee for the invitation to join you today to discuss the reauthorization of USDA's Child Nutrition and WIC Programs. I am Brandon Lipps, the Acting Deputy Under Secretary for Food, Nutrition, and Consumer Services (FNCS), as well as the Administrator for the Food and Nutrition Service (FNS), at USDA. FNS is responsible for administering America's nutrition assistance programs, which leverage the nation's agricultural abundance to ensure every American has access to wholesome, nutritious food, even during difficult times.

I know that this Committee is keenly aware of the critical importance of the Child Nutrition programs – including the National School Lunch Program (NSLP), School Breakfast Program (SBP), Child and Adult Care Food Program (CACFP), the Summer Food Service Program (SFSP) – and of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). Families across the nation rely on these programs to ensure access to the food that children, infants, pregnant women and new mothers need to promote their health and well-being. On an average school day in Fiscal Year (FY) 2018, 29.8 million children received a school lunch, and 14.7 received a school breakfast. Over 4.5 million received meals and snacks in child care settings through the CACFP. Last summer, 145.8 million meals were served to approximately 2.7 million children through the SFSP. These programs ensure that children have access to nutritious food when they are away from home to support their development and learning.

Similarly, we know that WIC ensures that pregnant and post-partum women, infants, and young children at nutritional risk have the food, counseling, and health services that give them a healthy start to an independent and successful future. WIC served a monthly average of 6.9 million women, infants and children in FY 2018.

These programs were last reauthorized over eight years ago. Reflecting the scope and significance of these programs to families and local communities across America, Congress has a long history of constructive bipartisan action to support and strengthen them. I am pleased to have the opportunity today to join you in that spirit to contribute to a reauthorization process that builds on the programs' history of success, while also advancing the Administration's nutrition assistance priorities – to improve customer service for our partners and participants, to protect and enhance integrity, and to strengthen the bonds between FNS programs and self-sufficiency.

It has been my privilege over the last two years to lead our efforts to move these priorities forward. In my view, all three are fundamental to the ongoing effectiveness of all nutrition

assistance programs. Good customer service is essential to efficient operations that achieve the programs' missions. Strong integrity safeguards for taxpayer investments in nutrition are fundamental to earning and keeping the public confidence that make these programs possible. And all programs ought to support a self-sufficient future for those who participate, because long-term reliance on government assistance has never been a part of the American dream. I'd like to share some of our activities related to the Child Nutrition and WIC programs, particularly in the areas of customer service and integrity.

### **Customer Service**

Agriculture Secretary Sonny Perdue has placed a robust focus on customer service across the Department. Given the number and diversity of those customers for FNS programs – those who participate, and those operate them – we are at the center of that effort. Great customer service starts with listening to customers of our programs, to understand their needs, their challenges, and the choices available to address them within the existing program authorities.

We held roundtables with program operators to understand their view of the programs. We heard first and foremost that school nutrition professionals needed targeted adjustments to existing meal standards to ensure that school meals were both nutritious and appealing to the students being served. That's why one of Secretary Perdue's first actions was to extend school meal flexibilities related to flavored milk, whole grains, and sodium. Making these flexibilities permanent provided the certainty that schools and food manufacturers needed as they continued to implement these standards. We also heard that the education and training standards for nutrition professionals USDA implemented as a result of the last child nutrition reauthorization put strain on smaller school districts. So we revised the rules, in accordance with the law, to allow small and rural school districts more flexibility in the hiring of new school nutrition program directors. We sought comments on the crediting system for child nutrition programs in an effort to make crediting more simple, fair, and transparent. The input told us that we needed to add food items which were not previously counted toward the meal pattern requirements.

I am proud of these successes, but we are still listening, and there is more to be done. We will continue to meet and to work with State agencies, school nutrition professionals, industry, and other stakeholders on a forward-thinking strategy that ensures school nutrition standards are both healthful and practical, while avoiding unnecessary burden and red tape. We do this because local nutrition operators know their student customers and their communities' best, and must be empowered to meet program standards with reasonable flexibility and common sense.

I have also held roundtables with the WIC community, including operators, business partners and participants, to better understand the challenges of operating this complex program. In these discussions, we've explored concerns about the food package and questions about flexibilities, improving the WIC shopping experience – with implementation of electronic benefit transfer a critical improvement strategy – and questions about access, and the potential role of technology to simplify the client application and participation experience. Beyond these discussions, I have visited WIC clinics to see firsthand the benefit this program provides to infants and children, and of course their mothers. Finding multiple opportunities to hear and heed the customer's voice is just good business, in both the public and private sectors.

### **Program Integrity**

Just as important as good customer service is ensuring strong program integrity, and we have taken many steps in this area. We heard that school meal program operators needed better tools to improve integrity and efficiency in easy-to-use ways. We have responded with new resources, such as:

- A web-based school meal application based on USDA's open-source integrity-focused application prototype. We provided information on how states, school districts, and even software designers can reduce household reporting mistakes and certification errors by adopting the use of our online application. The application guides users through the most error-prone parts of the application process to minimize errors. This is very similar to what you may see when using commercial tax software.
- Additional information and flexibilities in the Administrative Review cycle to ensure that these programs are operated correctly while reducing the burden on operators. We have switched to a risk-based approach but also offer flexibilities if state agencies are having difficulty with staffing and resources.

We recognize that more can be done. That is why we proposed in the Fiscal Year 2020 budget to strengthen the income eligibility verification process to focus more on applications, which targets applications at high risk for error.

Integrity is also an area of focus in WIC vendor management. FNS verifies State agency compliance with WIC requirements through management evaluations, which includes on-site reviews of State and local agency operations and documentation. In recent years, we have put in place a number of important changes, including a team dedicated to creating oversight tools for States, a program highly focused on management evaluations across the nation to assess WIC vendor operations and provide technical assistance before integrity problems emerge, and a newly revised WIC Vendor Management and Food Delivery Handbook. We continue to work closely with WIC State agencies in the area of vendor management and integrity to identify best practices and encourage innovation; provide guidance and technical assistance; address allegations of fraud, waste, and abuse; and improve data collection and reporting methods.

Finally in this area, in the last reauthorization Congress set the expectation that all WIC State agencies implement electronic benefit transfer (EBT) by October 1, 2020, or seek an exemption. The move to EBT supports increased program integrity and efficiency, while enhancing the customer experience and service. EBT:

- Benefits both participants and vendors by providing a more efficient checkout process, with fewer errors;
- Decreases vendor reimbursement time for WIC purchases;
- Provides State agencies with more accurate and timely data they can use to better monitor food costs and identify suspicious transactions; and
- Reduces stigma at checkout, and allows participants to purchase foods as needed, rather than being limited to a bulk purchase each month as is the case with paper food instruments.



As of April 2019, 47 WIC State, Territory and Tribal agencies have successfully implemented EBT statewide and the remaining 43 are in the planning or implementation stage. Thank you for supporting our efforts in this area.

We also work very closely with oversight organizations, such as the Government Accountability Office (GAO) and USDA's Office of the Inspector General (OIG) to identify and address integrity challenges. As you all are aware, OIG recently provided recommendations to FNS on ways in which we can strengthen integrity within the Summer Food Service Program. We appreciate our partnership with OIG and are actively working with them to improve SFSP, recognizing its vital importance to children, especially those in rural areas of the country. Our efforts include making changes to oversight and management protocols so that we can better evaluate State agencies during reviews. We will continue our push to improve accountability, transparency, and program operations.

In closing, I want to thank the Committee for your engagement with USDA to support reauthorization of these important programs. I know the painstaking effort required to develop legislation of this size and complexity, and we at the Department stand ready to provide any support and technical assistance that you need in completing your deliberations. I am happy to answer any questions you may have.

United States Government Accountability Office

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Testimony  
Before the Committee on Agriculture,  
Nutrition, and Forestry, U.S. Senate

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For Release on Delivery  
Expected at 10:00 a.m. ET  
Wednesday, April 10, 2019

## CHILD NUTRITION

### Observations on USDA Actions to Improve Program Integrity and Address Improper Payments

Statement of Kathryn A. Larin, Director,  
Education, Workforce, and Income Security

**GAO Highlights**

Highlights of GAO-18-087, a testimony before the Committee on Agriculture, Nutrition, and Forestry, U.S. Senate

**Why GAO Did This Study**

In fiscal year 2016, the federal government provided about \$30 billion for USDA's child nutrition programs, including the school meals programs, WIC, and SFSP, among others. In that year, the federal government spent almost \$14 billion on the largest of these programs, the National School Lunch Program, which supported the provision of meals to about 30 million children. Federal, state, and local entities play important roles in administering the child nutrition programs and ensuring program integrity. For example, USDA annually addresses improper payments in these programs, which are an indicator of program integrity, and states monitor implementation of the programs by local organizations that directly provide food and services to participants.

This testimony discusses (1) actions USDA has taken to address GAO's prior recommendations related to program integrity in the child nutrition programs and (2) improper payments in these programs. This testimony is based on prior GAO reports on child nutrition programs issued from 2012 through 2018, recent GAO and USDA reports on improper payments, and updates GAO obtained in March and April 2018 from USDA officials on actions related to GAO's prior recommendations and improper payments in child nutrition programs.

**What GAO Recommends**

GAO made 14 recommendations to USDA in its prior reports on child nutrition. USDA generally concurred with the recommendations and has addressed nine, taken some steps to address one, and is planning to address the remaining four.

View GAO-18-087. For more information, contact Kathryn A. Lavin (202) 512-7113 or [kallavin@gao.gov](mailto:kallavin@gao.gov).

April 2019

## CHILD NUTRITION

## Observations on USDA Actions to Improve Program Integrity and Address Improper Payments

## What GAO Found

The U.S. Department of Agriculture (USDA) has taken steps, or is planning steps, to improve the integrity of the child nutrition programs in response to recommendations from GAO's prior work. For example:

- **School meals.** In 2014, GAO identified several opportunities for USDA to improve school meals oversight and integrity. For example, through GAO's survey of states, over three-fourths reported a need for USDA guidance on monitoring the financial management of local entities that provide meals to children in schools—an area we reported states were newly required to review. GAO recommended that USDA assess states' needs for information in this area. USDA did this assessment and provided related guidance and training to states.
- **Special Supplemental Nutrition Program for Women, Infants, and Children (WIC).** In 2013 and 2014, GAO identified several ways that USDA could improve program integrity and oversight in WIC, which provides food benefits to individuals who are low-income. For example, GAO found that USDA had not used its own monitoring findings on state policies for determining applicants' income eligibility to target assistance to states, and recommended that USDA do so. In response, USDA developed a process for reviewing and acting on its monitoring results.
- **Summer Food Service Program (SFSP).** In 2018, GAO identified several opportunities for USDA to improve program integrity in the SFSP, which provides food to children in low-income areas when schools are closed for vacation. For example, GAO found that USDA did not collect reliable data on children's participation in the program and that estimates were calculated inconsistently from state to state and from year to year. GAO recommended that USDA take steps to improve the reliability of these estimates and take additional actions to improve program integrity. USDA recently reported plans to address GAO's recommendations.

USDA reported improper payments for four child nutrition programs totaling an estimated \$1.8 billion in fiscal year 2018, or just over 1 percent of the \$151 billion in improper payments that agencies estimated government-wide. GAO has reported that reducing improper payments—which generally include payments that should not have been made or were made in an incorrect amount—is critical to safeguarding federal funds. Since fiscal year 2013, the school meals programs have consistently reported the highest improper payment rates across the child nutrition programs. Over time, USDA has taken a variety of corrective actions aimed at reducing improper payments in child nutrition programs, yet estimated improper payment rates for these programs remained generally steady until fiscal year 2018. For that year, USDA changed what it considers to be an improper payment in the school meals programs, resulting in improper payment estimates that are substantially lower than those from prior years. The Office of Management and Budget (OMB) provides guidance to federal agencies on measuring and reporting improper payment rates, and USDA reported that it made this change after consultation with OMB.

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Chairman Roberts, Ranking Member Stabenow, and Members of the Committee:

Thank you for inviting me here today to discuss our work addressing program integrity in the U.S. Department of Agriculture's (USDA) child nutrition programs.<sup>1</sup> In fiscal year 2018, the federal government provided about \$30 billion for these programs, which include the school meals programs, Child and Adult Care Food Program (CACFP), Summer Food Service Program (SFSP), and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), among others.<sup>2</sup> In that year, the federal government spent almost \$14 billion on the largest of these programs, the National School Lunch Program (NSLP), which supported the provision of meals to about 30 million children, according to USDA.<sup>3</sup>

Federal, state, and local entities play important roles in administering the child nutrition programs, which generally provide nutrition assistance to children from low-income families, and ensuring program integrity. At the federal level, USDA's Food and Nutrition Service (FNS) oversees these programs by issuing rules and guidance, providing federal reimbursements to states, monitoring states, and estimating programs' improper payments—generally payments that should not have been made or were made in an incorrect amount. The states administer the programs, in part by establishing agreements with organizations that directly provide food and related services to participants at a variety of locations, such as schools, local health clinics, child care centers, and summer camps. States also monitor these organizations' implementation of the programs.

The child nutrition programs were last reauthorized by the Healthy, Hunger-Free Kids Act of 2010, and since then, we have issued several reports that recommended improvements aimed at ensuring the integrity of these programs. My statement today discusses (1) actions FNS has

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<sup>1</sup> In this statement, we include our work on the programs that typically have been part of a child nutrition reauthorization, according to the Congressional Research Service.

<sup>2</sup> USDA, *2020 USDA Budget Explanatory Notes for Committee on Appropriations—Food and Nutrition Service*, [www.obpa.usda.gov](http://www.obpa.usda.gov), accessed April 1, 2019.

<sup>3</sup> USDA's Supplemental Nutrition Assistance Program (SNAP) is the nation's largest nutrition assistance program, and though SNAP provides benefits to households that may include children, it is not considered a child nutrition program and therefore is not discussed in this statement.

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taken to address our recommendations related to program integrity in the child nutrition programs, and (2) improper payments in these programs. My statement is primarily based on our prior reports on these topics, issued from February 2013 through December 2018, which are cited throughout this statement. More detailed information on the objectives, scope, and methodology for that work can be found in each report. We also reviewed USDA's recent reports on improper payments in the child nutrition programs and obtained updates from USDA officials in March and April 2019 on actions related to our prior recommendations and improper payments in the child nutrition programs.

The work upon which this statement is based was conducted in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

### Child Nutrition Programs

According to USDA, beginning with NSLP's authorization in 1946, the federal government has gradually built an array of nutrition assistance programs designed to help the most vulnerable populations meet their food needs. Currently, eight of USDA's nutrition assistance programs are targeted to providing food to children, as noted in table 1. USDA oversees the child nutrition programs at the federal level, and state agencies and local organizations play key roles in program administration and implementation.

**Table 1: USDA's Child Nutrition Programs**

Program	Year first authorized	Key characteristics
National School Lunch Program (NSLP)	1946	Provides lunches at school; typically served in schools, to students in grades pre-K through 12, during the school day and year
Special Milk Program	1954	Subsidizes milk, not meals or snacks, in institutions that do not participate in NSLP or SBP
School Breakfast Program (SBP)	1966	Provides breakfasts at school; typically served in schools, to students in grades pre-K through 12, during the school day and year
Child and Adult Care Food Program (CACFP)	1968	Provides meals and snacks in early childhood and adult day care settings
	1994	Provides supper and snacks for school-age children after-school
Summer Food Service Program (SFSP)	1968	Provides meals and snacks to children generally age 18 and under during summer months and school vacation periods at a variety of sites including schools, community centers, camps, parks, and others
Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)	1974	Provides supplemental foods, as well as nutrition counseling and breastfeeding support, to pregnant, breastfeeding, and postpartum women; infants; and children under 5 years old
WIC Farmers' Market Nutrition Program	1992	Provides vouchers for WIC participants to redeem for fruits and vegetables at farmers' markets
Fresh Fruit and Vegetable Program	2002	Provides free fresh fruit and vegetable snacks to elementary school students

Source: Congressional Research Service, *An Introduction to Child Nutrition Reauthorization*, IF10266 (Washington, D.C.: Updated March 8, 2019). | GAO-19-506T

### Improper Payments

The Improper Payments Information Act of 2002 (IPIA), as amended, requires agencies to estimate improper payments for programs and activities identified as being susceptible to significant improper payments, implement corrective actions, and report on their results for these programs, among other things.<sup>4</sup> An improper payment is any payment that should not have been made or that was made in an incorrect amount (including overpayments and underpayments) under statutory, contractual, administrative, or other legally applicable requirements. It includes any payment to an ineligible recipient, any payment for an ineligible good or service, any duplicate payment, any payment for a good or service not received (except for such payments where authorized by

<sup>4</sup> IPIA, Pub. L. No. 107-300, 116 Stat. 2350, amended by the Improper Payments Elimination and Recovery Act of 2010 (IPERA), Pub. L. No. 111-204, 124 Stat. 2224, and Improper Payments Elimination and Recovery Improvement Act of 2012 (IPERIA), Pub. L. No. 112-248, 126 Stat. 2390 (2013), *codified as amended at* 31 U.S.C. § 3321 note. Agencies report a dollar value of estimated improper payments, as well as an error rate that reflects the estimated improper payments as a percentage of related program outlays.

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law), and any payment that does not account for credit for applicable discounts.<sup>5</sup> Reducing improper payments—such as payments to ineligible recipients or duplicate payments—is critical to safeguarding federal funds. The Office of Management and Budget (OMB) provides guidance to federal agencies on effectively measuring, reporting, and reducing their improper payment rates.<sup>6</sup>

USDA reports annual improper payment estimates for four child nutrition programs: the school meals programs—NSLP and SBP—as well as WIC, and CACFP. IPIA, as amended, requires agencies to review all programs and activities at least once every 3 years and identify those that may be susceptible to significant improper payments.<sup>7</sup> Federal law also requires agencies' Inspectors General to annually assess and report on whether agencies complied with six criteria listed in the Improper Payments Elimination and Recovery Act of 2010 (IPERA), as amended, related to improper payments.<sup>8</sup> These criteria are (1) publish an agency financial statement in the form required by OMB guidance; (2) conduct program-specific improper payment risk assessments, if required; (3) publish improper payment estimates, if required; (4) publish corrective action plans for programs and activities deemed susceptible to significant improper payments; (5) publish and meet annual improper payment reduction targets; and (6) report an improper payment rate of less than 10 percent for each program and activity for which an improper payment estimate was published. Federal law requires agencies with 3 or more consecutive years of noncompliance findings by their Inspectors General

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<sup>5</sup> See 31 U.S.C. § 3321 note. Office of Management and Budget (OMB) guidance also instructs agencies to report as improper payments any payment for which insufficient or no documentation was found.

<sup>6</sup> OMB, *Requirements for Payment Integrity Improvement, Circular A-123, app. C, M-18-20* (Washington, D.C.: June 26, 2018).

<sup>7</sup> IPIA as amended states that "significant" improper payments, for fiscal year 2014 and later, are those that in the fiscal year may have exceeded (1) 1.5 percent of program outlays and \$10,000,000 of program or activity payments in a fiscal year, or (2) \$100,000,000, regardless of the improper payment percentage of total program outlays. OMB guidance provides that programs that have been determined to be susceptible to significant improper payments and that are already reporting an estimate—or in the process of establishing an estimate—do not have to perform additional risk assessments.

<sup>8</sup> Inspectors General are also required to issue compliance reports. 31 U.S.C. § 3321 note.

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to submit to Congress a reauthorization proposal or a proposal for statutory changes necessary to bring programs into compliance.<sup>9</sup>

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### FNS Has Taken Steps to Address Several Issues Affecting Program Integrity in the Child Nutrition Programs

FNS has taken various actions to improve the integrity of the child nutrition programs in response to findings from our prior work. Over the last 6 years, we issued five reports on the school meals programs, WIC, and SFSP, which included recommendations to FNS intended to improve the integrity of these programs. In response, FNS has addressed many of these recommendations, though additional actions are needed.

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### FNS Took Steps to Improve Oversight of School Meals

In 2014, we issued two reports on school meals that found multiple opportunities for FNS to improve school meals program integrity and oversight, all of which FNS has since acted on.<sup>10</sup> Specifically, in January 2014, we recommended that FNS take two different actions aimed at providing assistance to improve state oversight of local school food authority (SFA) administration of the programs; and in May 2014, we recommended that FNS take multiple actions to improve oversight and enhance verification processes that ensure only children who meet income requirements receive free and reduced price school meals.

In January 2014, we reported that FNS had provided a significant amount of guidance and training to help states with oversight of local SFAs that directly provide meals to children in schools, but that certain aspects of the guidance may have hindered state oversight of program compliance.<sup>11</sup> (See fig. 1 for entities involved in school meals oversight.) For example, we found evidence indicating that FNS's guidance allowing

<sup>9</sup> We previously reported that when an agency determines that a reauthorization or statutory change proposal is not needed to bring a program into compliance, the agency should indicate such in its notifications to Congress. See GAO, *Improper Payments: CFO Act Agencies Need to Improve Efforts to Address Compliance Issues*, GAO-16-554 (Washington, D.C.: June 30, 2016).

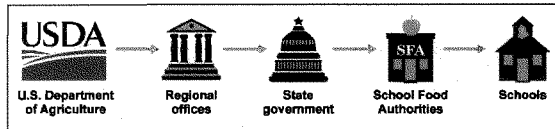
<sup>10</sup> See GAO, *School Lunch: Implementing Nutrition Changes Was Challenging and Clarification of Oversight Requirements Is Needed*, GAO-14-104 (Washington, D.C.: Jan. 28, 2014) and *School-Meals Programs: USDA Has Enhanced Controls, but Additional Verification Could Help Ensure Legitimate Program Access*, GAO-14-262 (Washington, D.C.: May 15, 2014).

<sup>11</sup> GAO-14-104.



states to focus their oversight on providing technical assistance to SFAs, rather than documenting instances of noncompliance and requiring corrective actions to address them, may have resulted in some SFAs that were not fully meeting requirements being certified as in compliance. According to *Standards for Internal Control in the Federal Government*, federal agencies should have policies and practices in place to provide reasonable assurance that programs are operating in compliance with applicable laws and regulations.<sup>12</sup> Without documentation of noncompliance and requirements for corrective actions, SFAs may not have adequate information on the types of ongoing compliance issues and the need to take corrective actions. Further, FNS may lack information on areas that are problematic across SFAs, which could be the focus of future technical assistance efforts.

**Figure 1: Entities Responsible for Overseeing and Administering the School Meals Programs**



Source: GAO. | GAO-19-506T

In 2014, FNS substantially revised and updated the process through which states conduct program oversight—the administrative review—and in our January report, we also found that states reported a need for more information and training related to monitoring SFA financial management.<sup>13</sup> Specifically, we reported that, previously, states had not been required to assess SFA financial management during monitoring reviews, but that states were now responsible for reviewing several aspects of SFA financial management, such as their nonprofit food service accounts and indirect costs. We surveyed all of the states, and over three-fourths reported the need for additional guidance or training from FNS on SFA financial management. We found that while FNS had provided some assistance to states on the new requirements related to

<sup>12</sup> GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: Sept. 10, 2014).

<sup>13</sup> GAO-14-104.

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SFA financial management, FNS officials had not collected information from all states on their needs in this area. Because state reviews are the key tool used to ensure the integrity of the school meals programs, if state reviewers are unable to effectively review SFA financial management, the federal government will lack assurance that SFAs are complying with federal requirements in this area.

In our January 2014 report, we recommended that the Secretary of Agriculture direct the Administrator of FNS to (1) clarify to states the importance of documenting compliance issues found during administrative reviews and requiring corrective actions to address them, and (2) assess all states' needs for information to improve their ability to oversee SFA financial management and provide assistance to meet identified needs.<sup>14</sup> FNS officials generally agreed with our recommendations and have since addressed them. For example, FNS issued a memo on July 11, 2014, to all regional and state directors reiterating the importance of documenting review findings and any resulting technical assistance and corrective actions. Also in that month, FNS completed its initial efforts to systematically assess all states' needs for information to improve their ability to oversee SFA financial management. Further, in 2015 and 2016, FNS discussed financial management issues with states during a national meeting and held three national training sessions and a webinar focused on reviewing SFA financial management.

In our May 2014 report on school meals, we found that FNS had taken steps to help identify and prevent children ineligible for free or reduced price meals from receiving those benefits,<sup>15</sup> but additional opportunities existed to enhance the application verification process and strengthen program integrity.<sup>16</sup> For example, we reported that school districts are required to verify applications for free and reduced price meals if they are deemed to be questionable, known as for-cause verification. Some school districts were not conducting any for-cause verifications and FNS guidance did not provide indicators or describe scenarios that could assist

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<sup>14</sup> GAO-14-104.

<sup>15</sup> In NSLP and SBP, children are eligible for free meals if their families have incomes at or below 130 percent of the federal poverty guidelines and reduced-price meals if their families have incomes between 130 and 185 percent of the federal poverty guidelines. Children who are not eligible for free or reduced-price meals pay the full price for the meal.

<sup>16</sup> GAO-14-262.

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school districts in identifying questionable applications. Further, FNS's data on the outcomes of applications verified for cause were combined with data on the outcomes of applications verified for other reasons, limiting FNS's ability to use these data to assess the effectiveness of for-cause verifications. *Standards for Internal Control in the Federal Government* direct agencies to design control activities to ensure management's directives are carried out.<sup>17</sup> Without FNS analysis of data on the outcomes of for-cause verifications, or provision of additional guidance on applications that may merit for-cause verification, some school districts may have continued to overlook these applications, potentially hindering program integrity.

In our May 2014 report, we recommended that the Secretary of Agriculture take multiple actions to improve integrity of the school meals programs through additional verification of applications, including that USDA evaluate the data collected on for-cause verification outcomes, and, if appropriate, provide additional guidance for conducting for-cause verification that includes possible indicators of questionable or ineligible applications.<sup>18</sup> FNS took actions in response to all of our recommendations. For example, FNS reported in March 2017 that it analyzed the data on verification outcomes and did not find that any benefit in integrity and oversight would be gained by requiring the reporting of for-cause verification outcomes separately. However, FNS also reported that it disseminated additional guidance in August 2014 for conducting for-cause verifications, which included criteria for identifying possible indicators of questionable or ineligible applications.

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<sup>17</sup> GAO-14-704G.

<sup>18</sup> GAO-14-262.

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**FNS Took Steps to Improve WIC Program Integrity and Oversight**

In 2013 and 2014, we issued two reports on WIC that found multiple opportunities for FNS to improve program integrity and oversight, many of which FNS has since addressed.<sup>19</sup> Specifically, in February 2013, we recommended that FNS review federal monitoring reports on state WIC program administration to assess program risks at a national level, and in December 2014, we recommended that FNS take multiple actions to improve federal WIC oversight and assist states' efforts to prevent and address online sales of WIC formula.

In our February 2013 report, we found that FNS regularly assisted and monitored states' administration of WIC but needed to improve agency oversight of states' policies and procedures for determining WIC applicants' income eligibility for the program.<sup>20</sup> We reported that while federal regulations define criteria that must be used to determine applicants' income eligibility for WIC, state and local agencies are also given some discretion. We found that FNS generally had not focused its assistance to states on key income eligibility requirements for which states have discretion, such as determination of family size and the time period of income assessed, in the years preceding our report. However, through its monitoring reports, FNS had identified problems with, or concerns about, income eligibility determination policies or procedures in one-third of the states reviewed. *Standards for Internal Control in the Federal Government* indicate that management should identify, analyze, and respond to risks related to achieving defined objectives and note that risk identification methods may include consideration of deficiencies identified through audits and other assessments.<sup>21</sup> At the time of our review, FNS officials said that they planned to begin regularly reviewing monitoring findings at the national level to identify areas of program risk and target assistance to states accordingly; however, officials did not indicate when those reviews would begin. Without conducting a complete review of its state monitoring findings, FNS lacked information it could potentially use to target additional assistance and clarification on income

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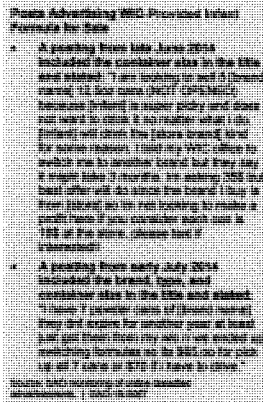
<sup>19</sup> See GAO, *WIC Program: Improved Oversight of Income Eligibility Determination Needed*, GAO-13-290 (Washington, D.C.: Feb. 28, 2013) and *Nutrition Assistance: Additional Guidance Could Assist States in Reducing Risk of Online Sale of Infant Formula*, GAO-15-94 (Washington, D.C.: Dec. 11, 2014).

<sup>20</sup> GAO-13-290.

<sup>21</sup> GAO-14-704G.

eligibility determination to states and help ensure overall program integrity.

In our February 2013 report, we recommended that the Secretary of Agriculture direct FNS to develop a timeline for reviewing its federal monitoring reports on state WIC program administration to assess program risks at a national level and target assistance to states.<sup>22</sup> FNS officials concurred with our recommendation, and FNS has since addressed it. Specifically, in that year, FNS staff developed a process to use an automated report to identify areas in need of correction or improvement that were found during its monitoring reviews of WIC conducted across the country. The report went into production on November 1, 2013, and FNS reported that staff would review the reports quarterly to assess the frequency of findings in each policy and program area and respond by providing policy clarification, training, or other corrective actions to states.



In December 2014, we reviewed the online sale of infant formula provided to WIC participants, a practice prohibited by WIC program rules, and concluded that FNS had provided limited assistance to states in preventing and addressing these sales.<sup>23</sup> We found that FNS had not conducted any nationwide studies on the extent of online sales of WIC formula by program participants, though information gathered from state WIC officials and our own limited monitoring suggested that some WIC formula was offered for sale online.<sup>24</sup> (See sidebar.) The use of the internet as a marketplace had substantially increased in the years preceding our report; therefore, actions needed to ensure WIC participants did not inappropriately use infant formula had changed as well. Yet, we found that FNS had not studied cost-effective techniques for monitoring potential online sales of WIC benefits. *Standards for Internal Control in the Federal Government* note that agencies should identify, analyze, and respond to significant changes that could impact the internal

<sup>22</sup> GAO-13-290.  
<sup>23</sup> GAO-15-94.

<sup>24</sup> Of the officials we spoke with in 12 states, those from 5 states said that they had found WIC formula offered for sale online by participants. GAO monitored one online classified advertisements website in four large metropolitan areas for 30 days and found two posts in which individuals attempted to sell formula specifically identified as WIC—from among 2,726 that advertised infant formula generally. A large number, 481 posts, advertised formula generally consistent with the formula brand, type, container volume, and amount provided to WIC participants, but these posts did not indicate the source of the formula.

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control system.<sup>25</sup> However, FNS had not directed states to inform participants that selling WIC formula, including online, is against program rules, which could lead to participants making these sales and unknowingly using program resources inappropriately. Further, we noted that although states are responsible for controlling participant violations—including sales of WIC benefits—FNS is responsible for determining compliance with the WIC statute and regulations. However, we reported that FNS had not required states to describe procedures for controlling these violations in their WIC state plans, leaving the agency without assurance that efforts were taking place nationwide.

Through interviews with state and local WIC agency officials from 12 states for our December 2014 report, we found that states varied in their approaches and the amount of resources devoted to monitoring attempted WIC formula sales, and some expressed concerns about the return on investment for these efforts.<sup>26</sup> Because WIC participants purchase the same brands and types of infant formula from stores as non-WIC customers, monitoring attempted online sales of WIC formula can present a challenge. State officials we spoke with cited additional challenges to monitoring online sales, including the difficulty of identifying WIC participants in online posts that allow sellers to remain relatively anonymous, and as a result, some expressed concerns about the return on investment for these monitoring efforts. *Standards for Internal Control in the Federal Government* suggest that agencies consider both benefits and costs when designing and implementing internal controls.<sup>27</sup> However, because FNS had not assessed the nationwide extent of online sales of WIC formula by program participants, nor determined cost-effective approaches for identifying and addressing these sales, FNS and the states were poorly positioned to strike the appropriate balance of costs and benefits when determining how to target their resources to ensure program integrity.

In our December 2014 report, we recommended that the Secretary of Agriculture direct the Administrator of FNS to (1) instruct states to inform participants that they are not allowed to sell WIC food benefits, including online; (2) require states to inform FNS of their procedures for identifying

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<sup>25</sup> GAO-14-704G.

<sup>26</sup> GAO-15-94.

<sup>27</sup> GAO-14-704G.

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attempted sales of WIC food benefits and analyze the information to ascertain the national extent of state efforts; and (3) collect information to help assess the national extent of attempted online sales of WIC formula and determine cost-effective techniques states can use to monitor online classified advertisements.<sup>28</sup> FNS agreed with our recommendations and took several steps to address them, though the agency has yet to fully address the third. Specifically, FNS promulgated final regulations that were effective in May 2016 requiring state agencies to inform applicants and participants about the prohibition against the sale of WIC food benefits, including online.<sup>29</sup> Further, in April 2015, FNS issued guidance directing states to articulate their policies and procedures for identifying and monitoring online sales of WIC benefits in their state plans; and in July 2018, an FNS contractor completed a study analyzing state efforts in this area. Also in that month, an FNS contractor completed a study intended to provide information to help FNS address our third recommendation that the agency assess the prevalence of online sales of WIC formula and identify cost-effective techniques states can use to monitor and prevent them. However, FNS indicated that it would not be releasing the study to states, in part because it included information that was investigative in nature. In April 2019, FNS officials indicated that they are currently developing guidance on best practices and cost-effective techniques identified in the report to disseminate to WIC state agencies later in 2019. Informing states of cost-effective techniques for monitoring and preventing online WIC formula sales would address our recommendation.

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**FNS Is Planning Steps to Address Our SFSP Recommendations**

In May 2018, we reviewed the SFSP, which generally provides food to children in low-income areas during periods when schools are closed for vacation, and assessed several aspects of the program, including participation.<sup>30</sup> (See fig. 2 for an SFSP breakfast we observed during a site visit to one of three states we visited.) We found that nationwide, the total number of meals served to children in low-income areas through the SFSP increased from 113 to 149 million (about 32 percent) from fiscal

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<sup>28</sup> GAO-15-94.

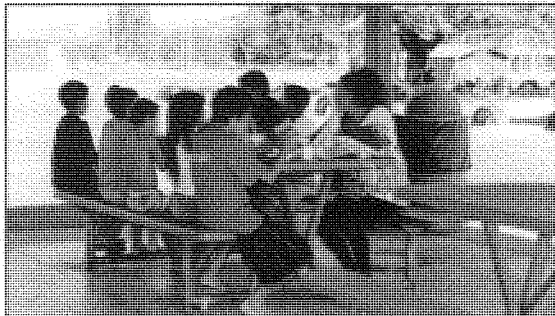
<sup>29</sup> Special Supplemental Nutrition Program for Women, Infants and Children (WIC): Implementation of Electronic Benefit Transfer-Related Provisions, 81 Fed. Reg. 10,433 (Mar. 1, 2016), adding 7 C.F.R. § 246.7(j)(10).

<sup>30</sup> GAO, *Summer Meals: Actions Needed to Improve Participation Estimates and Address Program Challenges*, GAO-18-389 (Washington, D.C.: May 31, 2018).

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year 2007 through 2016. FNS directs states to use the number of meals served, along with other data, to estimate the number of children participating in the SFSP. However, we found that participation estimates had been calculated inconsistently from state to state and year to year. Recognizing this issue, in 2017, FNS clarified its instructions for calculating participation estimates to help improve their consistency, noting that these estimates are critical for informing program implementation and strategic planning. However, we determined that the method FNS directed states to use would continue to provide unreliable estimates of participation, hindering the agency's ability to use them for these purposes. *Standards for Internal Control in the Federal Government* state that agencies should maintain quality data and process it into quality information that is shared with stakeholders to help achieve agency goals.<sup>31</sup>

**Figure 2: Summer Food Service Program Breakfast at a Park**



Source: GAO. | GAO-19-506T

In our May report, we made four recommendations to FNS to improve the integrity of the SFSP, including that FNS take steps to improve its estimate of children's participation in the SFSP by addressing, at a minimum, identified issues that continued to limit the reliability of the

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<sup>31</sup> GAO-14-704G.



estimate.<sup>32</sup> FNS officials generally agreed with our recommendations, and the agency has since provided information on actions it has planned, or begun to take, to address them. For example, in March 2019, FNS reported that it plans to complete an evaluation of how SFSP participation is calculated by summer 2020. We will continue to monitor FNS's progress in addressing our SFSP recommendations.

### Child Nutrition Programs Estimated \$1.8 Billion in Improper Payments in Fiscal Year 2018 and Have Consistently Been Reported as Noncompliant with Improper Payment Requirements

In fiscal year 2018, USDA reported improper payments for the child nutrition programs totaling an estimated \$1.8 billion, or just over 1 percent of the \$151 billion in improper payments federal agencies estimated government-wide in that year. GAO has reported improper payments as a material weakness in internal control in its reports on the U.S. government's consolidated financial statements, noting that improper payments have consistently been a government-wide issue and reducing these payments is critical to safeguarding federal funds.<sup>33</sup> Since fiscal year 2013, the school meals programs have consistently reported the highest improper payment rate estimates across the child nutrition programs. For example, in recent years, USDA reported annual improper payment rate estimates of about 15 percent and 24 percent for the NSLP and SBP, respectively, compared to about 5 percent and 1 percent for WIC and CACFP, respectively.<sup>34</sup> The estimated total amount of improper payments in the school meals programs are also high, and these programs, along with WIC, are included on OMB's list of programs with over \$100 million in annual monetary losses.

The USDA Office of Inspector General's (OIG) most recent report on the department's compliance with improper payment requirements, which assessed fiscal year 2017, found that the four child nutrition programs for which USDA estimates improper payments were noncompliant with

<sup>32</sup> See GAO-18-369. According to our analysis, the estimate of children's SFSP participation was unreliable because it did not account for existing variation in the number of days that each site served meals to children nor did it account for state variation in the month with the greatest number of SFSP meals served.

<sup>33</sup> GAO, *Financial Audit: Fiscal Years 2018 and 2017 Consolidated Financial Statements of the U.S. Government*, GAO-19-294R (Washington, D.C.: Mar. 28, 2019).

<sup>34</sup> These percentages reflect the average rate for each program from fiscal year 2013 through fiscal year 2017. Fiscal year 2018 rates for NSLP and SBP were lower, as discussed later in this section.

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improper payment requirements.<sup>35</sup> The reasons for noncompliance varied, as the OIG noted that USDA has yet to develop a methodology to report a complete improper payment estimate for CACFP,<sup>36</sup> and corrective actions taken in the other child nutrition programs have not yielded the desired reductions in estimated improper payments. According to our 2018 report, the four child nutrition programs contributed to the government-wide total of 58 programs in 14 federal agencies that agency inspectors general found were noncompliant with improper payment requirements in fiscal year 2017.<sup>37</sup> Further, the four child nutrition programs had been reported as noncompliant for 7 years. We also noted that USDA was one of three federal agencies with programs reported as noncompliant for 3 or more consecutive years that had not notified Congress of their noncompliance, as required, despite prior recommendations that we, and the OIG, had made to USDA to do so.<sup>38</sup> However, USDA submitted a letter to Congress in June 2018 that reported these programs' noncompliance and described the agency's planned actions to bring them into compliance.

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<sup>35</sup> See USDA Office of Inspector General, *U.S. Department of Agriculture's Fiscal Year 2017 Compliance with Improper Payment Requirements*, Audit Report 50024-0013-11 (Washington, D.C.: May 10, 2018). The OIG reported that each of the child nutrition programs did not fully comply with one or more requirements, including publishing a complete improper payment estimate, meeting annual reduction targets, or publishing improper payment rates of less than 10 percent. Further, the OIG noted that these programs had been noncompliant with requirements for 7 consecutive years, or since implementation of the annual assessment of compliance.

<sup>36</sup> Unlike the estimates for the school meals programs and WIC, CACFP's improper payments estimate is not a program-wide measure. USDA's Agency Financial Report for Fiscal Year 2018 notes that FNS has identified the Family Day Care Home component of CACFP as potentially high risk for improper payments, and as such, FNS periodically measures the level of erroneous payments due to sponsor error for Family Day Care Homes.

<sup>37</sup> Specifically, our analysis found that 58 programs in 14 of the 24 agencies listed in the Chief Financial Officers Act of 1990, as amended, were noncompliant with improper payment requirements in fiscal year 2017. See GAO, *Improper Payments: Additional Guidance Needed to Improve Oversight of Agencies with Noncompliant Programs*, GAO-19-14 (Washington, D.C.: Dec. 7, 2018).

<sup>38</sup> See GAO recommendations in GAO-16-554 and *Improper Payments: Additional Guidance Could Provide More Consistent Compliance Determinations and Reporting by Inspectors General*, GAO-17-484 (Washington, D.C.: May 31, 2017). See the USDA IG recommendation in, USDA Office of Inspector General, *USDA's Fiscal Year 2016 Compliance with Improper Payment Requirements*, Audit Number 50024-0011-11 (Washington, D.C.: May 2017).

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Over time, USDA has undertaken a variety of corrective actions aimed at reducing improper payments in the child nutrition programs,<sup>39</sup> yet the estimated improper payment rates for these programs remained generally steady until fiscal year 2018. For that year, USDA changed what it considers to be an improper payment in the school meals programs, resulting in improper payment estimates that are substantially lower than, and not comparable to, those from prior years.<sup>40</sup> According to USDA, FNS made this change after evaluating its definition of improper payments for the school meals programs and determining that the agency would no longer include a previously identified source of error in its estimates.<sup>41</sup> According to FNS officials, FNS implemented this change after consultation with OMB, and FNS also briefed the USDA OIG on the change in advance of implementation. The USDA OIG has not yet released its report assessing USDA's fiscal year 2018 compliance with improper payment requirements.

To help ensure that annual estimates are produced for all child nutrition programs susceptible to significant improper payments, a 2018 USDA OIG report recommended that FNS complete an SFSP risk assessment for improper payments taking into account all of the risk factors identified

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<sup>39</sup> For example, in 2009, we recommended that the Secretary of Agriculture take five actions to help states and SFAs improve their ability to identify and address meal counting and claiming errors in the school meals programs, all of which USDA took action to address. See GAO, *School Meal Programs: Improved Reviews, Federal Guidance, and Data Collection Needed to Address Counting and Claiming Errors*, GAO-09-814 (Washington, D.C.: Sept. 9, 2009).

<sup>40</sup> IPFA, as amended, defines "improper payment," and agencies must apply the term in the context of their programs when developing improper payment estimates. See 31 U.S.C. § 3321 note. In the 5 year period from fiscal years 2013 through 2017, NSLP's annual estimate of improper payments was about \$1.8 billion, while the SBP's annual estimate of improper payments was about \$900 million. For fiscal year 2018, USDA reported improper payment estimates of \$1.2 billion and \$489 million for NSLP and SBP, respectively. The annual estimated improper payment rates for these programs were about 15 percent for NSLP and 24 percent for SBP from fiscal years 2013 through 2017, as noted earlier. These rates dropped to 9 percent for NSLP and 11 percent for SBP in fiscal year 2018.

<sup>41</sup> According to USDA's Agency Financial Report for Fiscal Year 2018, FNS evaluated its definition of improper payment errors for the school meals programs and determined that previously identified meal claiming errors (those errors typically triggered by a child's failure to select a required fruit or vegetable) did not affect the eligibility status of the recipient, nor whether the right recipient received the right benefit. FNS officials indicated that they determined that previously reported meal claiming errors, therefore, did not meet the definition of improper payments.

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by OMB as likely to contribute to improper payments.<sup>42</sup> Although FNS's 2017 SFSP risk assessment concluded that the program was at low risk for significant improper payments, the OIG found that FNS's assessment was insufficient because it did not consider multiple risk factors regarding program vulnerabilities and improper payments that OMB requires be taken into account. The OIG reviewed SFSP's payment structure, monitoring results, and investigations and media cases regarding fraud, and found that these suggest the program is vulnerable to significant improper payments. FNS concurred with the OIG's recommendation. In April 2019, a senior FNS official indicated that the agency completed a risk assessment for SFSP in response to the OIG's recommendation, determined that the program is at a high risk of improper payments, and is currently developing a methodology for measuring improper payments in the program.

Chairman Roberts, Ranking Member Stabenow, and Members of the Committee, this completes my prepared statement. I would be pleased to respond to any questions that you may have at this time.

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### GAO Contact and Staff Acknowledgments

If you or your staff have any questions about this testimony, please contact Kathryn A. Larin, Director, Education, Workforce, and Income Security Issues at (202) 512-7215 or [larink@gao.gov](mailto:larink@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement. GAO staff who made key contributions to this testimony include Rachel Frisk (Assistant Director) and Theresa Lo (Analyst in Charge). In addition, key support was provided by David Barish, Daniel Flavin, Alex Galuten, Sheila R. McCoy, Jean McSween, Almata Spencer, and Matt Valenta.

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<sup>42</sup> See USDA Office of Inspector General, *FNS Controls Over Summer Food Service Program*, Audit Report 27601-0004-41 (Washington, D.C.: Mar. 27, 2018).

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April 10, 2019  
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Testimony

**Perspectives on Child Nutrition Reauthorization**

Committee on Agriculture, Nutrition and Forestry

Joshua Mathiasmeier, RD  
Director of Nutritional Services  
Kansas City, Kansas Public Schools

April 10, 2019

Good morning, Chairman Roberts, Ranking Member Stabenow, and members of this committee. I am Josh Mathiasmeier, Director of Nutritional Services for Kansas City, Kansas Public Schools (KCKPS). I have been the Director since July 2014 and previously worked at the Kansas State Department of Education on the Child Nutrition and Wellness team from January 2013 through July 2014. As the Director of Nutritional Services, I am responsible for the implementation of the Healthy Hunger Free Kids Act of 2010. Child Nutrition Programs provide a strong safety net for KCKPS children by ensuring their nutrition needs are met while also providing nutrition education. Thank you for inviting me to speak today and for your interest in making sure students have access to healthy meals that impact student success.

**Overview**

KCKPS is an urban school district in Kansas with approximately 23,000 students with a free and reduced percentage of 84.9%. The school district has approximately 68 known languages spoken and has over 9,300 EL students. Wyandotte County has demographics of 40.9% White, 23.2% Black or African American, 29.0% Hispanic or Latino and 6.9% Other. KCKPS operates USDA Child Nutrition programs in 53 buildings and participates in the following USDA Child Nutrition Programs to promote the health and well-being of children: the National School Lunch Program, School Breakfast Program, Afterschool Snack Program, Child and Adult Care Food Program, Summer Food Service Program, and the Fresh Fruit and Vegetable Program. KCKPS utilizes the Community Eligibility Provision in 47 of our schools.

**Innovative Meal Programs**

KCKPS strives to provide our students with high quality food and excellent customer service. During a normal school day, students have access to breakfast, lunch, and an afterschool snack or supper. Through the use of innovative meal programs, we are able to increase the quality and variety of our offerings while appealing to the 21<sup>st</sup> century student.

KCKPS has implemented Innovative Breakfast Programs such as Grab and Go Breakfast and Breakfast in the Classroom in 28 of our schools. Prior to implementation of Innovative Breakfast Programs, KCKPS averaged approximately 7,000 breakfasts per day. Currently, KCKPS averages over 14,000 breakfasts per day. By hosting breakfast meal service in the classroom or near the building entrances, we were able to increase access to healthy meals and incorporate the breakfast meal program into the school day.

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KCKPS is located in Wyandotte County where food insecurity impacts 16.8% of the population and 23.7% of children. With such a high food insecurity rate in our county, Nutritional Services department strives to provide access to healthy food for all students. On top of the breakfast and lunch programs offered during the school day, KCKPS offers afterschool snack or suppers at 38 schools and 2 libraries. Schools incorporate the snack or supper meal into their afterschool event or activity while including an educational or enrichment component. On a daily basis, KCKPS serves approximately 600 afterschool snacks or suppers.

KCKPS serves over 32,000 meals per day during the school year through breakfast, lunch and afterschool snack or supper programs. KCKPS understands that hunger continues to be a concern during the summer months. Through partnerships with hunger advocacy groups, KCKPS bridges the gap between school meal service by operating the Summer Food Service Program with summer meal sites at over 40 locations. With locations of summer meal sites in areas such as schools, pools, libraries, community centers, public parks, urban farms, community colleges, farmers markets and community housing complexes, KCKPS provides broad access to children during the summer months. KCKPS was awarded a Cities Combating Hunger Through After School and Summer Meal Programs (CHAMPS) grant to increase access to summer and afterschool meals. Through partnerships with local officials and hunger advocacy groups, KCKPS increased access to summer meals by identifying underserved areas and improving access by bringing meals to where children were using a Food Truck. The vehicle used for the food truck was an inoperable district vehicle brought to life through a complete overhaul of the all working parts and branded with a wrap designed by a middle school student. On a daily basis during the summer, KCKPS serves over 4,000 meals to children.

#### **Operation of Multiple USDA Child Nutrition Programs**

KCKPS strives to provide access of healthy meals for our students in KCKPS and all children in Wyandotte County. To do so, KCKPS operates the aforementioned USDA Child Nutrition Programs.

While many of the Child Nutrition Program regulations are the same, it is challenging to streamline when there are several differences in regulations between USDA Child Nutrition Programs. This causes a great deal of confusion when administering multiple programs. KCKPS encourages USDA to create consistency between USDA Child Nutrition Programs. Examples include:

- The Child and Adult Care Food Program meal pattern for Pre-K requires more meat/meat alternate than the meal pattern for K-5 in the National School Lunch Program.
- Milk fat and flavor requirements are not consistent between programs. In the Summer Food Service Program, there are no restrictions on fat content or flavor of milk served. Flavored milk cannot be served in the Child and Adult Care Food Program. The National School Lunch Program allows skim and low-fat flavored and unflavored milk as long as there is one unflavored option.
- The National School Lunch Program allows 2 ounce equivalent grain based desserts per week, while the Child and Adult Care Food Program does not allow any grain based desserts. For instance, granola bars cannot be served for Child and Adult Care Food Program At-Risk Afterschool Meals but students can have a granola bar as a part of the National School Lunch, Breakfast and Afterschool Snack Programs.

Each USDA Child Nutrition Program has oversight by the State Agency through reviews. Each USDA Child Nutrition Program has a unique review cycle. During the 2017-18 school year, KCKPS received audits by the State Agency for each of the following USDA Child Nutrition Programs: the Administrative Review which includes the National Schools Lunch Program, School Breakfast Program, Afterschool Snack Program, and Fresh Fruit and Vegetable Program, Child and Adult Care Food Program, Summer Food Service Program, and Procurement Review. KCKPS understands the importance of compliance and accountability but the reporting requirements are overwhelming and require in excess of 100 hours of administrative time to ensure smooth and successful reviews. KCKPS encourages USDA to simplify and streamline the compliance and accountability reviews and

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return to a five-year Administrative Review Cycle for School Food Authorities (SFAs) that consistently operate in compliance.

In addition to the State Agency reviews, KCKPS is required to complete onsite monitoring site visits for the National School Lunch Program, School Breakfast Program, Afterschool Snack Program, Child and Adult Care Food Program, and Summer Food Service Program. During the 2017-18 school year KCKPS completed over 340 onsite monitoring visits which require over 150 hours of administrative time, many at the same location due to operating multiple USDA Child Nutrition Programs. KCKPS encourages USDA to simplify and streamline the onsite monitoring process to become more efficient.

#### **Meeting Needs of Customers**

KCKPS strives to meet the individual needs of our customers with their unique background and demographics. The customers at KCKPS are unlike any group of customers in surrounding school districts. The school districts in Kansas that immediately border KCKPS do not share many of the same demographics as our customers. It is important for KCKPS to remain focused on the needs of our customers through local control of food, equipment, supplies and resources. Through local control, KCKPS is able to stay nimble in meeting the constantly changing needs of our customers. KCKPS encourages USDA to continue giving local control for the many decisions that impact our customer's unique needs.

#### **Community Eligibility Provision**

KCKPS participates in the Community Eligibility Provision in 47 of our schools. On April 1, 2016, KCKPS had 10,974 students Directly Certified. On April 1, 2019, KCKPS had 9,008 students Directly Certified, down 17.9% over a 3-year period. Many factors at the local, state and federal level impact the drop in Directly Certified students including SNAP Eligibility, SNAP Outreach, Socioeconomic Status Change, and Immigration Status. KCKPS encourages USDA to continue to offer the Community Eligibility Provision to SFAs to increase access of healthy meals to children.

#### **Conclusion**

The Child Nutrition Reauthorization Act, known as the Healthy, Hunger-Free Kids Act of 2010, provided historic changes in child nutrition programs to give students healthier meal options. Implementation has resulted in increased consumption of fruits and vegetables and whole grains. Schools are leading culture change to instill healthy habits for a lifetime. KCKPS has a passion for making sure students have access to healthy, safe and tasty meals. KCKPS encourages USDA to ensure SFAs can efficiently and effectively serve students these meals because they are critical to children's lifelong success.



**Testimony**

Submitted to The Committee on Agriculture, Nutrition, and Forestry  
United States Senate

**Hearing**

*"Perspectives on Child Nutrition Reauthorization"*  
Wednesday, April 10, 2019  
216 Hart Senate Office Building

**Statement of Mr. Michael J. Halligan**

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Dear Chairman Roberts, Ranking Member Stabenow and distinguished Members of the Committee:

Thank you for the invitation to attend today's hearing. My name is Mike Halligan. I serve as CEO for God's Pantry Food Bank in Lexington, Kentucky. I've had the good fortune to benefit from more than 35 years of experiences in the food and grocery product industry through a number of roles across manufacturing, corporate, and non-profit sectors. Over the years, my hunger-relief service includes activities as a volunteer, a donor, a board member, an employee, and an executive leader. Today, I am both honored and humbled to testify on behalf of more than an estimated quarter million food insecure Kentuckians, including nearly 72,000 hungry children who reside in Central and Eastern Kentucky.

My remarks will address the critical role federal afterschool and summer feeding programs play in addressing childhood hunger throughout the year. While I will focus on these two federal programs, I in no way intend to diminish the importance or the significant impact of nutritious food and meal programs that assist families with children in child care and during school or pregnant women, infants and toddlers served through critical initiatives such as the Supplemental Nutrition Assistance Program (SNAP), the National School Lunch Program (NSLP), the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) and others. My intent is to share insights about the role God's Pantry Food Bank and other food banks play while addressing childhood hunger in communities through innovative public-private partnerships as well as how the Child and Adult Care Food Program (CACFP) and the Summer Food Service Program (SFSP) are key in those efforts.

## **Background**

God's Pantry Food Bank provides hunger-relief services across a 16,000 square mile, geographically diverse, 50 county service area. This region of Kentucky includes 30 rural, 14 small town, and 6 metro counties.<sup>ii</sup> Eleven of the counties are among the 50 counties in the U.S. with the lowest median incomes.<sup>iii</sup> The Food Bank directly serves many of those who are hungry in our region with much needed food assistance and also provides food, grant assistance, programming, and capacity support to more than 400 partner food pantries and meal programs that also directly serve those in need. We are one of seven members of the Feeding Kentucky network who provide a broad array of hunger-relief services across the Commonwealth. We are also one of 200 members of the Feeding America national network who provide similar services through 60,000 food programs including food pantries, soup kitchens, shelters, afterschool programs, summer feeding sites, and many other hunger-relief services.<sup>iv</sup> Like the colleagues testifying here today, we work daily to address childhood hunger in our country.

Food insecurity in our service area and, in fact, across our country continues to be a significant concern with a staggering number of people and children who are affected as shown in Table 1:

Table 1, Food Insecurity<sup>v</sup>

	Central & Eastern KY	Kentucky	United States
Food Insecurity	253,460	685,830	41,204,000
Childhood Hunger	71,850	194,440	12,938,000

Sadly, in Central and Eastern Kentucky 1 in 5 children may not know when or where they'll receive their next meal.<sup>vi</sup> Nationally the risks are also sobering with 1 in 6 children unsure when they might eat again.<sup>vii</sup> Though not always visible, childhood hunger remains a significant problem in the United States. Millions of families do not have the resources to purchase the food that they need. In most of these families, parents protect children from hunger. Though their children may not get the nutritional quality or variety that they need for proper health and development, parents will reduce their own portion sizes or skip meals to protect children from actual hunger pangs. Several years ago there was a poignant story that aired on a nationally broadcast news magazine show that will forever be etched in my mind. The mother's stated goal during the interview was simply not to have to cut her milk with water in order to make ends meet! More recently, a Feeding America study found that 91 percent of households accessing charitable food programs in my home state of Kentucky reported that they opted to purchase inexpensive, unhealthy food to make ends meet.<sup>viii</sup> Nutritional food is a basic need. We must end hunger.

Fortunately, the United States has a robust and complementary set of federal child nutrition programs to protect children from hunger and promote improved nutrition and health. Since their implementation in the 1960s, federal child nutrition programs serving children outside of school hours complemented the National School Lunch Program established in the 1940s. Together, the child nutrition programs have been successful in reducing the hunger and extreme malnutrition that we saw in the United States several decades ago.

For more than 40 years, CACFP and SFSP have been critical federal Child Nutrition programs that have helped bridge nutritional gaps experienced by hungry children. In Kentucky, CACFP at-risk meals helped

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provide food to some 17,000 children in October of 2017.<sup>ix</sup> Table 2 shows the scope of afterschool and summer meal program support from school districts, day cares, YMCAs, food banks, public libraries and so many other compassionate and dedicated organizations, staff members, and volunteers over the past year:

Table 2, Kentucky CACFP and SFSP Scope<sup>x,xi,xii</sup>

	Sponsors	Sites	Average Daily Site Attendance	Snacks & Meals
CACFP (At Risk Site Data)	79	443	17,219	3,034,567 (~ 42 weeks)
SFSP	166	2,602	80,847	2,998,901 (~ 10 weeks)

Comparing this data, particularly the SFSP data, to National School Lunch Program data reveals how structural and administrative limitations along with site availability and recipient constraints may be impacting SFSP participation rates and successes. During the 2017-2018 school year the NSLP in Kentucky averaged between 7.0 and 7.2 million meals each month.<sup>xiii</sup> However, the 2018 Summer Food Service Program in Kentucky only averaged between 1.2 and 1.4 million meals in June and July (about 18% of NSLP).<sup>xiv</sup>

Child nutrition programs are only effective when they reach the children who need help. Frequently programs targeting children during out-of-school times, like the Summer Food Service Program (SFSP) and the Child and Adult Care Food Program (CACFP), fail to reach the majority of children in need of food assistance.

Closer to home, God's Pantry Food Bank sponsors 12 afterschool sites under CACFP including 3 YMCAs, 3 libraries, 3 churches, and 3 other afterschool enrichment programs (one of which is a creative mentoring program offered to youth by students at the University of Kentucky). We also sponsored 31 summer feeding sites in eight counties last summer under SFSP including 6 low-income housing complexes, 4 libraries, 4 YMCAs, 11 churches, and 6 parks/community centers/other. Ten of the sites we sponsor provide year-round services under both CACFP and SFSP. In addition to these critical Child Nutrition programs the food bank sponsors 19 Back Pack Programs in two counties and supports several more of these privately funded programs across our service area. These programs provide critical weekend sustenance to children who receive meals through the National School Lunch Program during the week but are currently not reimbursed through federal child nutrition programs due to restrictive structures. Our hope is that we will be able to fund and continue growing afterschool, summer feeding, and weekend programming, but our work to do so would be significantly strengthened by changes in federal policy. Improving CACFP and SFSP efficiencies and simplifying program requirements as outlined below will serve as much needed catalysts to ensure hungry children receive sound nutrition throughout the year.

### **Innovation and Policy Solutions**

There are several policy changes Congress should make that would help reach more children during the summer, after school, and on weekends. We need a two-part strategy to reach children when they are out of school. First, we need to strengthen the site-based model by streamlining federal programs and making it easier for schools and community providers to expand the number of sites available to children. Second, we need to allow communities to adopt alternate program models to fill the gap where children cannot otherwise access a meal.

**Strengthen the Site-Based Model**

To strengthen the site-based model and reach more children when they are out of school, we recommend that community providers be able to operate one program year-round through SFSP which would reduce red tape and streamline federal programs. To further encourage more sites to participate, the area eligibility requirement used by many sites should be changed to make it easier for sites to operate in communities with concentrations of low-income children.

**Provide a Seamless Year-Round Options for All Sponsors**

When addressing childhood hunger, one complex challenge we as providers face involves duplicate and inconsistent rules and regulations. As I have testified, we utilize two federal child nutrition programs: the Summer Food Service Program and the Child and Adult Care Food Program under the "at-risk" site provisions for CACFP. I'll try to simplify this by putting them in two categories, summer regulations and school year regulations. Quite often, we are feeding the same children in the same location, so one would think we would be operating under the same guidelines. That would be an incorrect assumption. The rules for one don't always apply to the other. The paperwork is different. The nutrition requirements are different. The reimbursement rates are different. The training is different. Even the calendars can be different from one school district to the next. Needless to say, it gets very confusing. Why not have a program with one set of rules and regulations to complement the National School Lunch Program for both summer and afterschool meals?

Today, we switch from SFSP in the summer to CACFP for the school year... and back again throughout the year. As a sponsor, this means attending two trainings ourselves and then training each site on the new guidelines, often for the same staff and same sites back-to-back. For staff at food banks and other non-profit and community providers throughout the country this means thousands of trainings, and an inefficient use of time. Compounding the differences in calendars are differences in reimbursement forms and even reimbursement amounts for each meal provided under SFSP or CACFP.

Sponsors often find themselves working within multiple state guidelines when you add in metropolitan areas with multiple school districts or food banks who serve across state boundaries, such as our Feeding Kentucky peer Freestore Foodbank in Cincinnati, who serves Ohio, Indiana, and Kentucky. Similarly, Facing Hunger Foodbank, another Feeding Kentucky member, with a more rural service area based out of Huntington, West Virginia works under guidelines to serve counties in West Virginia, Ohio, and Kentucky.

It can be challenging to find sites to operate throughout summer. Excessive red tape discourages many organizations from becoming permanent meal sites. Many sponsors find that a site will only choose to operate under one of the two programs. Others choose not to offer a program at all!

Let's talk about nutritional requirements. First of all, I think they are a good thing. Having meal guidelines means that we know the meals are nutritious. We can't serve Kool-Aid and cookies for lunch, which means the kids are receiving a meal that always has protein, grains, vegetables, fruits, and dairy.

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But sometimes those guidelines become very confusing when they are different between programs. The people who are working or volunteering at feeding sites are not food and nutrition professionals for the most part. This is not meant to be critical of them. We have many wonderful community volunteers, librarians, or child care providers that work to provide meals. The difference between programs leads to unnecessary challenges in menu planning, despite training and support from the sponsor. Is it ½ cup vegetables plus ¼ cup fruit or ¾ cup mixed fruit? A nutritionist will tell you that the child's body doesn't know the difference between vitamin A in a carrot or in an apricot, but the current regulations differentiate between the two programs. And when the same site provides meals during the school year and during the summer, there are real challenges to making sure they're following the correct requirements as they're forced to switch back and forth between SFSP and CACFP.

Wouldn't it be more efficient administratively to simply declare a breakfast a breakfast, a lunch a lunch, a supper a supper, and a snack a snack? I don't think a hungry child, or even a consumer in general, thinks about any of these meals any differently over the course of a year.

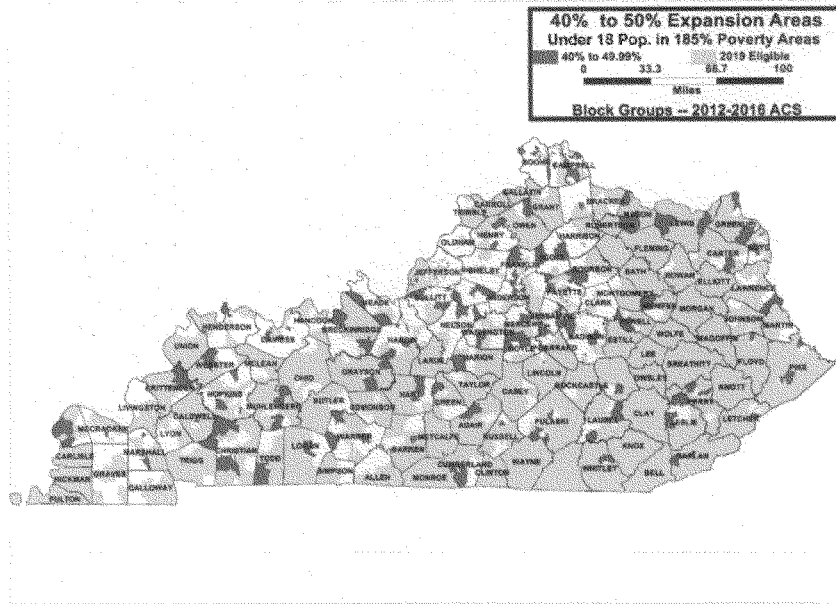
These high administrative burdens coupled with low reimbursement can make sponsors shy away from participation, resulting in fewer feeding sites for kids. Likewise, these confusing regulations can make volunteers less likely to participate, which can be detrimental to those kids who might be unsupervised after school or during the summer if it were not for these feeding sites. After 50 years, it's time to align these two programs into one seamless year-around program for all sponsors and sites to administer.

**Align Area Eligibility Across Federal Summer Programs**

Another way to expand the number of sites available to children would be to change the area eligibility criteria to allow more sites in low-income areas to operate. To qualify currently as an open site, a site must meet the area eligibility test – located in an area where at least 50 percent of school children are eligible for free or reduced-price meals (at or below 185 percent of poverty). While sponsors keep track of the number of children and meals served each day, they do not collect individual income-eligibility data. This reduces the sponsors' paperwork, increasing their likelihood of participation and allowing them to focus on site enrichment activities and nutritious meals.

However, the 50 percent threshold is inconsistent with other federally funded summer programs, such as the 21st Century Community Learning Center programs and Title 1, which require at least 40 percent. Better aligning the eligibility between these federal programs would maintain the program's focus on areas with above average numbers of low-income children while opening new access points for underserved families. Figure 1 shows the new areas in Kentucky that would be available to operate open sites in 2019 with this improvement.

Figure 1: Aligned Federal Summer Program Area Eligibility Improvements in Kentucky<sup>iv</sup>



**Allow Alternate Program Models in Underserved and Hard-to-Reach Areas**

A second recommendation to reduce the summer meal gap is to permit community organizations, such as God’s Pantry Food Bank, to operate alternative program models to reach kids where they do not otherwise have access to a meal site. No two communities are the same, and therefore our partner organizations need a variety of tools and program models to effectively reach those in need. This includes proven strategies such as providing flexibility from the requirement that kids consume meals on-site, allowing communities to deliver or send meals home with children, and giving families a summer grocery card to supplement their household food budget. Where the current site-based model is available, it is great for children. These additional federal program models should complement the site-based model to effectively fill the gaps to ensure low-income children have access to the nutrition they need throughout the year. Allowing complementary program models and strong national standards will ensure that whether children live in Kentucky or Indiana, Maine or Mississippi, they will have nutrition programs available throughout the year.

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**Relax the Congregate Feeding Requirement**

Clearly childhood hunger is an issue of crucial importance. Let's acknowledge that it is never the fault of a child if they are hungry. Private sector, government, non-profit, faith-based, corporate and educational institutions must work together to deliver food and hope to our vulnerable children.

To do just this, Kentucky Department of Agriculture Commissioner Ryan Quarles started the Kentucky Hunger Initiative, an effort which brings together farmers and community leaders to work collectively to alleviate hunger throughout the Commonwealth. They found that USDA-reimbursed afterschool meal programs and summer feeding programs in Kentucky were limited in their reach because of federal rules mandating that meals must be served in a group setting, under the supervision of the feeding site sponsor<sup>xvi</sup>, rather than permitting children to take meals into their home. God's Pantry Food Bank and others who work on the front lines of child hunger-relief could serve more nutritious meals, and reach more hungry children, if the program were allowed flexibility from the so-called "congregate feeding" rule in rural and other underserved or hard to reach communities where the site-based model has proven challenging or unsustainable.

The logistical challenges of delivering nutritious meals to children in the summer, when school is out of session, are significant. Modifying the congregate feeding rule would allow rural states like Kentucky the flexibility we need to serve nutritious summer meals to hungry children who live in hard-to-reach areas. Modifying the rule would also enable feeding site sponsors to allow children living in violence-prone neighborhoods to consume their summer meals in the safety of their own homes rather than requiring them to eat meals in open areas where they could be exposed to harm.

According to Commissioner Quarles, "Similarly, after-school meal programs could achieve a greater impact if school food service directors and other site sponsors had the option to distribute nutritious 'meals to go' on their way out the door at the day's end. Allowing the child to consume his or her meal later in the day, at home, could enable the child to bridge the nutritional gap between the end of the school day and breakfast the next morning."

To better understand just how underserved these children are, recall from earlier in this testimony that 17,219 low-income children benefited from afterschool suppers on an average weekday in Kentucky during October of the 2017-2018 school year, a robust 16% increase from the previous year. That sounds great, doesn't it? But the fact is that only 1 in 25 Kentucky kids that have access to a free lunch at school have access to a free afterschool meal through CACFP at-risk programming. In other words, for those 17,000 kids who were served, another 420,000 to 425,000 Kentucky children did NOT have access to or seek to receive a subsidized evening meal.<sup>xvii</sup> How many of these are children who may not eat until returning to school the next day?

As you know, congregate feeding sites are just that. Feeding *sites*. They require meals to be consumed at a specific, approved location. This works very well for *some* locations: summer school, YMCA's, Boys and Girls Centers, child care centers, summer camp programs, or similar site-based options. There is no denying that congregate feeding sites, when they are accessible for a child and family, provide educational, social and interpersonal skill development opportunities. But in our rural Kentucky counties, hungry children may live 20 miles from a feeding site. It's simply not practical and in most cases not cost effective for the child to get to a summer feeding location. In Kentucky, only 1 in 12 children who participate in the school lunch program receive a summer meal.<sup>xviii</sup>



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Let that sink in. 1 in 12. That's roughly 92% of those children who receive a free or reduced-price meal during the school year who are NOT able to access a summer meal. We need to provide Kentucky, and all 50 states, more feeding options in rural or high-poverty communities where children do not have access to congregate sites.

This is where mobile feeding initiatives help. In one of our counties, the public library serves as a summer site. After those children have eaten, the library packs meals into a book mobile and drives to a low-income housing area. Another requirement is that meals are to be consumed on premise in the presence of supervising staff. This sounds great in principle. But at this particular location, there are no picnic tables or park benches. So on a hot, summer day, or heaven forbid a day with thunderstorms, the children must stand or sit on the ground in the vicinity of the mobile unit to consume the meal. The librarian knows of a child with a physical disability who lives in the apartment building. Unfortunately, that child is not eligible for a SFSP meal because he cannot leave his apartment to congregate as part of the official site to consume the meal. The librarian instead has to pack a separate, *non-reimbursed meal*, for the child and has the child's sibling take that separate meal to him!

If regulations were modified, the child would receive a SFSP meal and the other children could return to their apartments, or even sit in the shade on their own porch. This would also offer the library book mobile the opportunity to be more efficient and travel to other locations to deliver additional meals.

Within Kentucky, 75 sponsors provided meals at 679 mobile sites. Mobile meal sites have grown from around 100 in 2015 to almost 700 in the past 3 years.<sup>xix</sup> Mobile feeding initiatives are an innovative solution, particularly for children and families with transportation barriers.

This metric speaks to the rural nature of Kentucky -- access to summer meals is difficult even with innovations in transportation. While access to meals is increasing because of mobile meals, sponsors are still struggling to reach all kids because of the geographic isolation many rural families live in.

We were thankful when Congress appropriated funding to the U.S. Department of Agriculture (USDA) in 2009 to test innovative program models for reaching kids during the summer months. Several of the demonstrations tested programs that have shown to be effective through smaller, privately-funded efforts, such as providing kids with backpacks to serve them during the days when they are not able to reach a site. Other program models delivered meals to kids in rural areas where there were no sites that a child could travel to. In these models, implemented in Massachusetts, New York, and Delaware, children received meals close to their homes. By relaxing the congregate requirement in hard to reach areas -- such as rural communities, where there are no sites available, or where weather or safety challenges impact participation -- providers like the God's Pantry Food Bank can utilize all of our innovative resources to reach those in need.

Modifying feeding requirements would allow more children to be served each day. Local municipalities know what can and cannot work in their own communities. A "one size fits all" approach is not functioning in our rural and underserved communities. It's time to update the way we feed kids in the summertime. States and communities need flexibility to meet rural, suburban and urban children's needs. We need to use the most efficient and effective policies and reach hungry kids, no matter where they live.

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**Utilize Efficiency of a Summer Grocery Card**

At God's Pantry Food Bank we are excited by another program model that was tested by the USDA to reach hungry kids in the summer: a family grocery card. Since beginning in the summer of 2011, eight states and two Indian Tribal Organizations have participated in Summer EBT Demonstration projects to provide families with a grocery card pre-loaded with \$60 per month per child certified for free or reduced-price school meals.<sup>xx</sup> This creative solution helps to offset an estimated incremental \$300 low-income households spend a month on groceries during the summer<sup>xxi</sup>, helping to partially relieve additional economic pressures on their already limited finances and assisting with the trade-offs between food, rent, medical bills and utilities these household face.

States administered the program through the EBT systems in either the Supplemental Nutrition Assistance Program (SNAP) or the Women, Infants, and Children (WIC) program. The demonstration projects were extensively evaluated and in both rural and urban counties. The results were significant. In households that received funds to purchase groceries during the summer, very low child food security decreased by 33 percent. When compared to non-participants, kids also improved their nutrition outcomes. They consumed more fruits and vegetables, more whole grains, more dairy, and fewer sugar-sweetened beverages. What's more, more than 80 percent of families in the typical demonstration area used the benefit, which is significantly larger than fewer than 20 percent of children who are able to access the current congregate summer meal program.<sup>xxii</sup>

While we believe in the importance of private-public partnerships to provide programming and meals to kids in need throughout the year, we know recreating the infrastructure that exists during the school year is not feasible in all communities and therefore would like to see the grocery card program expanded and implemented in communities that have high need and are particularly difficult to reach.

**Summary of Recommendations**

**Strengthen the Site-Based Model**

- Allow community providers to operate one program year-round through SFSP
- Align the area eligibility threshold with other federally funded summer programs

**Allow Alternate Program Models in Underserved and Hard-to-Reach Areas**

- Relax the Congregate Feeding Requirement
- Utilize Efficiency of a Summer Grocery Card

Making real progress toward ending child food insecurity and ensuring opportunity for all of our nation's children will require investing new resources toward increasing access, particularly during times when children are out of school like summer. Simply making small incremental change is not enough. After 50 years the time has come for break-through, "step function", innovation. An investment in funding through Child Nutrition Reauthorization with seamless year-around afterschool and summer programming is an investment in our children's health and education. An investment that will ensure a productive competitive future workforce that will pay dividends in years to come. I encourage The Committee on Agriculture, Nutrition, and Forestry to advance recommendations to strengthen child nutrition programs in reauthorization helping to end hunger in this country.

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I'll close with a final thought also etched forever in my mind. I had just finished a press conference in Lewiston, ID to open an afterschool Kids Cafe program at a local Boy's and Girl's Club. A student, who I'll simply call "K", approached and handed me a small framed drawing of a slice of buttered toast. I smiled, saying "thank you." The reply was, "No, thank you. Because of the food you help me get I'm not as hungry and I do better in school." Leave it to the mind of a child to help one clearly see the need.

It has been my honor to have testified today on behalf of "K". Thank you.

All the very best,



Michael J. Halligan  
Chief Executive Officer  
God's Pantry Food Bank, Inc.

<sup>i</sup> Gundersen, C., A. Dewey, A. Crumbaugh, M. Kato & E. Engelhard. *Map the Meal Gap 2018: A Report on County and Congressional District Food Insecurity and County Food Cost in the United States in 2016*. Feeding America, 2018. <http://map.feedingamerica.org/>

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<sup>1b</sup> Afterschool Suppers: A Snapshot of Participation 2018, Afterschool Nutrition Report. Food Research and Action Center, October 2018. <http://www.frac.org/wp-content/uploads/afterschool-report-october-2018.pdf>.

<sup>1c</sup> Summer Food Service Program 2018. Raw data. Kentucky Department of Education, December 2018. Kentucky, Frankfort.

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<sup>1e</sup> Afterschool Suppers: A Snapshot of Participation 2018, Afterschool Nutrition Report. Food Research and Action Center, October 2018. <http://www.frac.org/wp-content/uploads/afterschool-report-october-2018.pdf>.

<sup>1f</sup> Summer Food Service Program 2018. Raw data. Kentucky Department of Education, December 2018. Kentucky, Frankfort.

<sup>1g</sup> Map provided by Food Research and Action Center, April 2019.

<sup>1h</sup> 7 C.F.R. 225.6(e)(15) (requiring summer meals feeding site sponsors to agree in writing that they will "[m]aintain children on site while meals are consumed"); see also USDA Memo CACFP 10-2017 (April 6, 2017) (mandating that CACFP "meals must be consumed on-site in order for the meal to be reimbursable")

<sup>1i</sup> Afterschool Suppers: A Snapshot of Participation 2018, Afterschool Nutrition Report. Food Research and Action Center, October 2018. <http://www.frac.org/wp-content/uploads/afterschool-report-october-2018.pdf>.

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Testimony of  
**Lauren Waits, Director of Government Affairs**

On behalf of the  
**Atlanta Community Food Bank and the  
Georgia WIC Working Group**

Before the  
**Senate Agriculture Committee**

April 10, 2019



**Chairman Roberts, Ranking Member Stabenow, and members of the Committee,** thank you for the opportunity to tell you about the work we are doing in Georgia to increase participation in the Special Supplemental Nutrition Program for Women, Infants and Children (WIC). I represent the Atlanta Community Food Bank. We provide over 61 million meals a year to about 755,000 food insecure people in our 29-county service area covering metro Atlanta and northwest Georgia. As the Director of Government Affairs, I am responsible for advocacy, education, and policy priorities including an emphasis on efficient and effective use of federal nutrition programs such as school meals, SNAP and WIC.

At the Atlanta Community Food Bank our goal is to assure that all people in our service area have access to the nutritious food they need when they need it. Through more than 600 partner agencies, we serve families living in a wide array of circumstances, from the density of urban Atlanta, to suburban neighborhoods and smaller cities like Rome and Dalton, GA, and we also serve rural counties that supply poultry and produce to a global market. Despite our state's rich agricultural resources, about one in seven families in Georgia is food insecure, meaning they do not always know where their next meal is coming from.

Our innovative partnership with the Georgia WIC program began in 2016, through a series of conversations between government, philanthropic and nonprofit service providers. This partnership led to collaboration on qualitative and quantitative market research that is guiding new outreach and promotional activities for WIC-eligible families in Georgia. I will share key findings from that research today, but first I would like to explain why the WIC program has emerged as such a focus for our food bank.

### **Why WIC?**

We know that WIC "safeguards the health of low-income women, infants and children up to age five who are at nutritional risk."<sup>i</sup> Evidence from more than 40 years of program experience confirms that:

"WIC supplemental foods have shown to provide wide ranging benefits. They include longer, safer pregnancies, with fewer premature births and infant deaths; improved dietary outcomes for infants and children; improved maternal health; and improved performance at school, among others. In addition to health benefits, WIC participants showed significant savings in healthcare costs when compared to non-participants."<sup>ii</sup>

The arguments for promoting WIC as a nutritional program are unassailable. At the Atlanta Community Food Bank, we also observed that WIC might be a relatively untapped resource for those of us fighting food insecurity. We already had a strong, decade-long partnership with the Georgia Department of Children and Family Services



to perform screening and enrollment assistance for the Supplemental Nutrition Assistance Program (SNAP), or food stamps, because of SNAP's powerful role in helping families put food on the table during tough times. Our benefits outreach workers have always provided referrals to WIC, but it was only with the 2016 implementation of Georgia's integrated benefits enrollment system, "Gateway," that we gained the possibility of tracking successful WIC certifications from these referrals.

At the same time, the Food Bank began executing a new 10-year strategic plan to fill the gap between families' nutritional needs and available meals. Our analysis showed that working families with children comprise over 60% of the people we serve. Child nutrition programs, therefore, became a central focus as we expanded our programming with school, summer and afterschool meal providers. We currently serve 40 schools that have 50% or more of their students participating in Free & Reduced Price Breakfast and Lunch programs. These schools are in six counties and seven school districts, and our work supports onsite food pantries, mobile pantries, afterschool and summer food distributions. As we looked for opportunities to deliver children's meals through the full range of federal nutrition programs, we also noted that Georgia WIC would be converting to an Electronic Benefit Transfer (EBT) system by 2020. Declining WIC participation both nationally and in Georgia gave us a sense of urgency to understand and better support WIC participation both through the adoption of EBT and more broadly.

Georgia has a unique set of assets in the early childhood sector. We were one of the first states to offer universal PreK, and under then-Governor Sonny Perdue our state created the first state-level Department of Early Care and Learning. We are also home to Georgia Shape, a nationally-recognized cross-sector initiative to address childhood obesity that is organized through the Georgia Department of Public Health. However, in 2016, we realized that WIC participation was not a significant policy priority for any of Georgia's leading early childhood organizations. Yet the number of children enrolled in WIC in Georgia declined by nearly half between 2007 and 2016, from 341,000 to 188,000.<sup>31</sup> We challenged ourselves at the Food Bank to become a WIC champion.

#### How to Help?

With the Georgia Department of Public Health and Georgia WIC program leaders, the Atlanta Community Food Bank began hosting quarterly stakeholder meetings to establish a statewide "WIC Working Group". Children's Healthcare of Atlanta, the Georgia Chapter of the American Academy of Pediatrics, the Georgia OB/GYN Society, Family Connection Partnership, Healthy Mothers Healthy Babies, Georgia Head Start, and representatives from leading advocacy groups such as Voices for Georgia's Children and Georgians for a Healthy Future now participate in subcommittees dedicated to data analysis, marketing and program supports. The Georgia Food



Industry Association, representing grocers across the state, joined us as a founding member and has been instrumental in helping us to anticipate vendor concerns and opportunities for collaboration.

Over the last decade, the number of people eligible for WIC has declined because the economy has improved and there are fewer births, especially to women under age 30. These trends explain an appropriate decline in the number of families eligible for WIC. However, the portion of eligible families who participate in WIC also decreased over this period, and it has decreased to a greater extent in Georgia than in many other states.<sup>iv</sup> WIC Working Group members decided that we needed a better understanding of why eligible families are not participating in order to decide on collective strategies to increase participation. The Georgia WIC team told us that they gather extensive information from participating families through their annual customer satisfaction survey, but they have little information from eligible people who are not enrolled in WIC. Current participants express great appreciation and consistently high satisfaction rates.

With the support of the WIC Working Group, and with funding from our donors, the Atlanta Community Food Bank hired an independent market research firm to conduct a series of focus groups with eligible but not enrolled families. GA WIC staff participated in the survey design team, as well as maternal and child health experts and nonprofit service providers. In October of 2017 about 80 total participants attended 8 sessions at a location in suburban Atlanta. They were paid \$100 each for 90 to 120-minute group discussions. Pre-screening and onsite surveys confirmed that each participant had at least one household member who was currently eligible for WIC and that no one in the household was currently enrolled in the program. Participants were primarily African American, White and Latino. A bilingual facilitator led half of the groups in English and half in Spanish at the particular request of GA WIC staff. Half of the groups had never participated in WIC, and half had participated previously but were not currently enrolled. While the majority of participants were mothers, every group included at least one father, and about 10 focus group participants were grandmothers.

#### **Why Not WIC? Focus Group Findings**

Viewed in the light of compelling research showing that WIC participation is associated with healthier infants, more nutritious diets, lower obesity rates and better health care for children, and higher academic achievement for students, it is not immediately obvious why a family would decline to participate. We asked, "Why not WIC?" in order to gain insight into the personal reasons that individuals might choose not to enroll in the WIC program. It is important to emphasize that this qualitative research is not statistically significant and should only be used to suggest barriers and solutions rather than prove or confirm them. Many participants' answers began to change and/or





become more complex over the course of the focus group session, and these responses were just as insightful as opinions that remained fixed throughout.

Discussion topics were organized into eight categories:

- General awareness and perceptions of WIC
- General knowledge of enrollment and participation
- General knowledge of food benefits
- General knowledge about nutritional education
- Food insecurities
- Cultural competency
- Technical issues
- Recommendations for increasing participation

Due to overlapping themes in people's responses, discussion findings can be summarized according to four main observations.

#### 1) Eligible Families Have Positive Perceptions of WIC

Prior participants and those who have never participated both view the WIC program as a valuable safety net for families in need, supporting nutrition for young children and pregnant and breastfeeding women. WIC is most widely known for helping with the cost of baby formula and milk, while many are aware that it provides other healthy foods and nutrition education. These positive views were generally formed through recommendations from obstetricians and pediatricians, hospital social workers at the time of labor & delivery, and from friends and family members. Some participants said,

*"I couldn't work when I had the baby so knowing the baby would get enough formula was a huge help."*

*"When I was at the hospital, a nurse came and explained everything. It was really easy. I was signed up by the time I left."*

*"I like the nutrition education aspect. We grew up eating anything and I didn't really know how to prepare healthy foods" (before WIC).*

#### 2) Eligible Families Have Experienced Food Insecurity

Most of the participants acknowledged times when they either did not know where their next meal was coming from, or they felt like WIC played a crucial part in preventing them from arriving at that point. Families use a variety of strategies to avoid reaching a point of desperation, including tapping other public benefits like SNAP and Free and Reduced Price Breakfast and Lunch for their older children. They have also accessed resources from food banks, local churches and extended family members. That said, a consistent answer for why families are not currently enrolled in WIC was, "We don't



need it." Focus group participants generally expressed a desire to "save" WIC for other people who were in greater need. Some of their comments were,

*"I'll be okay if I don't eat for a day or two until the next (pay)check comes in. But the babies always ate. I knew with WIC they'll always have their milk."*

*"After you pay rent, phone, and I don't even have a car, there's not much left over."*

*"As long as I'm healthy and I have a job, I can make ends meet. I wouldn't take help unless I really needed it."*

*"If I took (WIC) there might be someone else who really needs it."*

### 3) Customer Service Matters

Most prior WIC participants said it was easy to apply for WIC and they told stories about learning valuable information regarding nutrition and healthy food preparation. However, there were negative associations and complaints about long waits in some clinics and staff members who offer less-than-stellar service. Many focus group participants, including some who had never participated in WIC, said the vouchers, which are still on paper in Georgia, offer little flexibility and make grocery shopping time-consuming and frustrating. These participants noted,

*"When there's a hundred people with kids running around (in the clinic) you start to think, 'is it really worth it for \$8 worth of food?'"*

*"You have to get that exact product and sometimes the store doesn't have it...I know it will take twice as long to ring up. People behind you see the vouchers and judge you."*

*"You have to buy everything on the list or lose it. The store doesn't have it that day or maybe my kids were sick last month so we didn't drink so much milk. Why not let you add on the next time?"*

### 4) Eligible Families Are Tech-Savvy

All of the participants in our focus groups had a personal smartphone. They reported regularly accessing the internet to seek child nutrition information and other resources for their families. Most also have access to a computer or tablet at home, and they are accustomed to signing up for services online. When presented with the idea to switch from vouchers to an EBT card, and when the possibility of completing program requirements through their phones was described, the ideas were universally lauded. Respect for privacy was also viewed as a plus. They said,

*"That (EBT card) takes away a LOT of obstacles."*



*"Much more convenient. They can probably set it up where you don't have to get vouchers, do it all online."*

*"(SNAP) gives you a card that looks like a debit card so no one knows."*

The full research report has been distributed by the National WIC Association and I had the opportunity to present our findings at their annual conference last spring. Food and Nutrition Service research staff hosted me for a presentation at their offices in Bethesda, Maryland in June, and with a colleague from the Georgia Family Connection Partnership we also presented the research to the Georgia WIC Nutrition Directors last summer. Open Hand, a member of the WIC Working Group, used insights from the focus group report to shape their design of a healthy food promotion program at the clinic level. The Marketing Subcommittee is currently designing a survey of WIC and SNAP-eligible families that would be administered through cell phones in suburban Atlanta to assist in designing new marketing materials. A corporate sponsor is currently reviewing a grant proposal to fund this supplemental research. We also provided a Mobile Food Pantry at a WIC Clinic last month and are evaluating future partnerships for fresh produce distribution, given its importance to clients in the focus groups. Most importantly, the focus group findings will inform Georgia WIC's vendor selection process for EBT and guide selection of related tools such as phone apps and other technologies to streamline and enhance the shopping experience.

#### **Child Nutrition Reauthorization**

With Feeding America and its 200+ member food banks, we are eager to support the reauthorization and enhancement of WIC as part of the Child Nutrition legislative package. The National WIC Association (NWA), the Food Research & Action Center (FRAC) and the Center on Budget and Policy Priorities (CBPP) have all been important advisors to the GA WIC Working Group and have helped us to gain a thorough understanding of WIC's invaluable impact. We ask that this Committee continue to consult with these groups as it has done so effectively in the past, and to give their recommendations particular consideration with regard to strengthening child nutrition programs generally and the WIC program in particular. We are aware of several enhancements that have been suggested for WIC. Our work on the ground in Georgia assures us these would be effective changes that would benefit children and their families and support the responsible stewardship of government resources. In order of priority, these are:

- **Keep WIC as accessible as possible.** The mechanisms that are currently used to serve as many eligible WIC participants as possible are working. From competitive bidding strategies to EBT conversion efforts, staff certification requirements to marketing material guidelines, a complex but effective structure



is currently in place to deliver WIC's important services to families in need. As we look to fill the meal gap and assure healthy outcomes for pregnant women and their young children, Georgia needs WIC to remain broadly accessible and robust in its core structure.

- **Provide extended certification periods and lift the age of coverage.** Participating families have described the difficulties they face in maintaining WIC certification while also fulfilling work obligations, making regular pediatric visits, and caring for other children in the household. Longer certification periods would help them to maintain the food benefits and stay connected to nutrition education. As Georgia WIC customer satisfaction surveys have revealed, families that do participate in the program recognize its value, and we agree that lifting the age to which children may be covered will have an important positive impact on their food security and nutrition.
- **Evaluate performance and establish metrics on cross enrollment in benefit programs.** The Atlanta Community Food Bank launched the WIC Working Group not simply to increase the number of meals that families are able to gain from WIC, but also because we know that when a family is enrolled in one program they are better able to access the other programs for which they are eligible. Accessing the full range of benefits allows for cost efficiencies and better outcomes. A model from USDA is direct certification for school meals. For more than a decade, USDA has been required to measure and publish state performance with regard to automatically enrolling school-age children in households receiving SNAP and/or Free & Reduced Price Breakfast and Lunch. When the measurement began, only 68% of children who should have been directly certified, were; whereas today, 92% are directly certified. This increase has resulted from concerted efforts by USDA, states and school districts. We would like to see the same approach in WIC. Any pregnant woman or child under five who participates in SNAP or Medicaid is automatically income-eligible for WIC. It would be helpful to know what share of these women and children are being enrolled so that we can work on reaching the rest and assess progress over time.

It is difficult to overstate the importance of the Special Supplemental Nutrition Program for Women, Infants and Children. I would simply like to add, that as an adoptive parent whose child was nourished by her birth mother and the WIC program until we could feed her ourselves, I am also personally grateful for the existence of WIC and I witness its benefits to my daughter every day. Thank you for your dedication to child nutrition. I would be happy to answer questions at your convenience.



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COMMUNITY  
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End hunger. Grow stronger.

<sup>1</sup> <https://fns-prod.azureedge.net/sites/default/files/wic/wic-fact-sheet.pdf>

<sup>2</sup> *ibid*

<sup>3</sup> <https://datacenter.kidscount.org/data/tables/614-children-enrolled-in-the-wic-program-birth-through-47loc=12&loct=2#detailed/2/any/false/870,573,869,36,868,867,133,38,35,18/any/1437>

<sup>4</sup> <https://fns-prod.azureedge.net/sites/default/files/ops/WICEligibles2016-Volume1.pdf>



*A National Platform for the Child and Adult Care Food Program Community*

April 10, 2019

Senator Pat Roberts, Chairman  
 Senator Debbie Stabenow, Ranking Member  
 Committee on Agriculture, Nutrition and Forestry

The National CACFP Sponsors Association (NCA) Board of Directors, on behalf of our national membership, appreciates the opportunity to provide oral and written testimony for the hearing on "Perspectives on Child Nutrition Reauthorization."

We thank you for the opportunity to raise awareness about the Child and Adult Care Food Program (CACFP) and to showcase stories of family home child care providers. We've highlighted many of your constituents, their passion for the children in their care, and why they value the benefits of CACFP. Included as well is the impact the program is having in your home states and nationwide. As we gather CACFP provider showcases for all 50 states, we are happy to continue to share the stories with you.

As you consider the Child Nutrition Reauthorization Bill, we request that Congress pass regulation that strengthens program access and supports participation of underserved children; ensures nutrition quality; and simplifies program administration and operation.

We would like to offer the Chairman and all committee members the opportunity to connect with us and any member of our association to learn more or hear first-hand how vital and necessary the program is.

We also extend an invitation for you to join us in Chicago as our guest at the 2019 National Child Nutrition Conference where over 1,600 attendees from across the country will convene for professional development for both the Child and Adult Care Food Program and the Summer Food Service Program.

As shared in the oral testimony, we remain available to offer our collective program expertise should anyone on the committee have further questions as Reauthorization proceeds.

Thank you for your support of the CACFP and our nation's most vulnerable population.

Respectfully submitted,

The Board of Directors of the National Child and Adult Care Food Program Sponsors Association

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## Perspectives on Child Nutrition Reauthorization Hearing

April 10, 2019

Kati Wagner, Vice President, National CACFP Sponsors Association (NCA)

Oral Testimony

Good morning. Chairman Roberts, Ranking Member Stabenow and Members of the Committee, thank you for the opportunity to testify today for the first time. My name is Kati Wagner and I serve as the Vice President and Policy Chair for the National Child and Adult Care Food Program Sponsors Association (NCA). We are a national association whose mission it is to support the hundreds of thousands of people who make up the USDA Child and Adult Care Food Program community, the CACFP, which includes sponsoring agencies, family child care homes and centers, Head Start, afterschool at-risk sites, and adult day care facilities, as well as state agencies, anti-hunger advocates, and industry supporters.

As the president of a sponsoring agency for the CACFP, I personally work with each of those groups in Colorado and with family child care homes in Wyoming. Today, it is my honor to share an overview of the CACFP, often referred to as the food program.

The CACFP is part of the Richard B. Russell National School Lunch Act of 1946. Though smaller than the school lunch program, current appropriations serve about 4.5 million children each day and over 2 billion meals annually. CACFP provides funding to child care facilities (homes and centers), afterschool programs, homeless shelters, and adult day care facilities as reimbursement for serving healthy foods to those in their care. Funding not only improves the nutrition for children and older adults when parents or caregivers are working, it helps small businesses offset the higher cost of serving healthier food, while allowing parents to work and have access to quality child care. This program is one of the best examples of a public private partnership, improving children's lives and supporting working families while boosting local economies.

CACFP is a multi-faceted approach to feeding food insecure children through various settings. One avenue of participation is with a Sponsoring Organization. This is the only way licensed, family child care providers can participate in the USDA food program. Family home sponsoring organizations are non-governmental, non-profit organizations which are responsible for maintaining program integrity by making frequent on-site visits to the child care home, offering training, support, and oversight. Examples of the training and support we provide are in our written testimony. Sponsors ensure that child care providers are in compliance with nutrition guidelines and are operating successfully so that families can work. As a sponsor, my organization visits the child care provider's home at least three times a year to verify children are in care and meals are being served which meet USDA's meal pattern requirements.

With the remainder of my time, I would like to tell you about a family child care provider enrolled in the CACFP from Cortez, Colorado. Many of the resources I will reference can be found in the written testimony.

Meet Mickey. Mickey's children arrive between 7:00-8:30 am each morning. Their day starts with a healthy breakfast of oatmeal, strawberries, and a glass of milk which is funded by the CACFP. Her kitchen walls are covered with the USDA Team Nutrition posters showcasing fun, healthy nutrition ideas, USDA's MyPlate poster, NCA's motivational posters, and her children's art work. After breakfast, the children have circle time playing and learning about colors and shapes until their morning snack of carrot sticks and watermelon slices, also funded by the CACFP reimbursement. Next, they go outside, even in the Colorado winters, for physical activity time playing games they've learned about in NCA's CACFP Training Program Calendar until it's finally time for lunch! In the CACFP, lunch includes a meat or meat alternate, grain, milk, vegetable and a fruit so today at Mickey's they are having baked chicken breast, broccoli trees, apple slices, a whole grain-rich roll, and glass of milk. This is made possible with reimbursement funding from the CACFP. Mickey's parents do not pick up their children until 6:00-7:00 pm so she provides an afternoon snack of orange wedges and graham crackers as well as a CACFP creditable dinner including whole grain-rich spaghetti, tomato sauce, tossed spinach salad, garlic bread, and milk. Mickey is only reimbursed for two meals and one snack through the CACFP each day but she provides all of the meals to the children in her care because 8 out of 10 are food insecure. The last time I was in her home, she was explaining to me how grateful she is for the support she receives by participating in the CACFP under a sponsoring organization. The program allows her to serve more nutritious food, to keep enrollment fees down, and to serve substantially more food than the minimum CACFP requirements to the children in her care. In fact, on Monday mornings, Mickey serves two to three times the amount of food for breakfast she normally would because the children come in so hungry.

Across the country millions of children are being served by providers (or small business owners) just like Mickey. We've included more stories about CACFP providers in our written testimony. This Committee has an important opportunity in 2019 to improve the health of our nation's children by passing a strong Child Nutrition Reauthorization that protects and strengthens all child nutrition programs. These successful, cost-effective federal nutrition programs play a critical role in helping children in low-income families achieve access to child care and educational and enrichment activities while improving overall nutrition, health, development, and academic achievement.

We are very excited that Reauthorization is back on your table. It has the ability to change what is on the table for over four and half million children each day. As the national association for providers, meal sponsors, and front-line users of the CACFP, we are eager to share suggestions that we believe would improve the CACFP. Most of the program improvements (based on our broad, national membership base) do not represent any increase in cost to the program but would create efficiencies and reduce barriers to participation. You can learn more about these in our written testimony.

In closing, we would like to thank the USDA's Food and Nutrition Service leadership team and staff for their hard work and partnership with our program operators to continually improve the food program. Our nation's children deserve the best nutrition available to be ready to learn at school and to grow and develop into healthy adults. The NCA Board is available to offer our collective program expertise as Reauthorization moves through the process and I am happy to answer any questions at this time, or follow up with our detailed recommendations for the Program.

Thank you for your support of the CACFP and our nation's most vulnerable populations.





## 2019 Child Nutrition Reauthorization Policy Priorities

### **Increase Reimbursement Rates for Family Home Child Care Providers in Order to Support Improved Meal Service**

The last increase in reimbursement rates for family home child care providers was July 2015. All meals and snack increased by \$.01 except Tier 2 snacks, which remained the same. In July 2016 all reimbursement rates went down by \$.01 or \$.02 except for Tier 2 breakfast and snacks, which remained the same. These rates are tied to the Consumer Price Index for food eaten at home which has minimal variance. Day care centers reimbursement rates are linked to the Consumer Price Index for food eaten away from home. Included is a chart that reviews the comparison of family home child care and centers. Family child care has experienced increased cost of doing business just as child care centers have. Their rates should be based on the same index as child care centers in order to be sustainable on the food program.

### **Eliminate USDA Regional Office and State Agency Add-Ons to Federal Regulations**

Require USDA Regional Offices and State Agencies to adhere to Federal Regulations without adding additional rules or restrictions which create barriers to participation. The additional requirements added by state agencies to an already complicated program becomes problematic as the cost of operation increases and compliance becomes more complicated. This practice of increasing requirements may make participation vary state to state and has the effect of some children in need not receiving benefits. Examples range from food allowances to administrative procedures that become costly and burdensome. NCA feels that the Federal Government has a comprehensive and doable set of requirements that do not need to be increased at the state level.

### **Streamline CACFP At Risk Afterschool and Summer Food Service Program; Currently CACFP Facilities Must Drop Off CACFP and Apply for Summer Food**

The At Risk After School program operates only during the school year. When the school year ends, sites must switch over to the Summer Food Service Program. Some of the areas of the country have robust At-Risk programs and other areas are strong in SFSP. To allow both programs to run year-round (yet not simultaneously) would create the ability to feed children throughout the year without program hopping. We support Summer all year long as well as CACFP At Risk all year long based on the facility choice and availability of programs.

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**Extend Income Eligibility for Child Care Centers in CACFP**

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A for-profit center is eligible for participation based on the income level of the families they serve; they will qualify if at least 25% of the children are within income guidelines for free and reduced meals. Eligibility must currently be verified every month. All other CACFP programs have eligibility determinations that last for one year (income) up to five years (school or census). This requirement has created a burden for the center and/or the sponsoring organization. By extending eligibility determinations to at least every 6 months or annually, the administrative burden has been decreased and the potential for error has been significantly reduced, freeing up administrative funds for other CACFP requirements such as training.

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**Set Center Reimbursement Rates Annually**

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Blended or percentage formulas used to determine reimbursement rates should be in effect for one year. The current regulation states that the state agency shall assign rates of reimbursement, not less frequently than annually. This has given state agencies the ability to set these rates as often as monthly creating additional paperwork, increased margins of error and significant time spent to determine the correct rate. Once centers can determine eligibility less frequently, it would make sense to have the rate determination follow the same time frame.

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**Allow Serious Deficiency Determinations to be Appealable**

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Expand opportunity to appeal to institutions and family child care. Establish guidelines in determining when there is a serious deficiency, including what measures automatically result in a serious deficiency and how differentiation is being made between a reasonable margin of error and systematic or intentional noncompliance.

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**Allow Expanded Area Eligibility for At-Risk Afterschool Programs**

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Some afterschool programs serve all low-income children, yet the area school district does not reflect the income level of children served. If children are being transported by bus from a school with low income families to the At-Risk site, allow the predominate school percentage to meet the At-Risk qualification.

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**We support adding “providers, parents and participants” to the nutrition education provision.**

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This ensures State Agency and sponsor funds may be used to educate all.

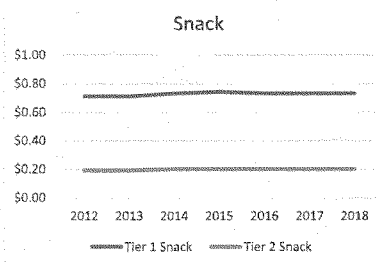
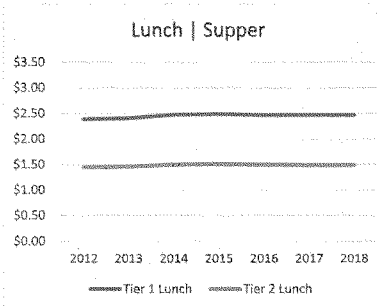
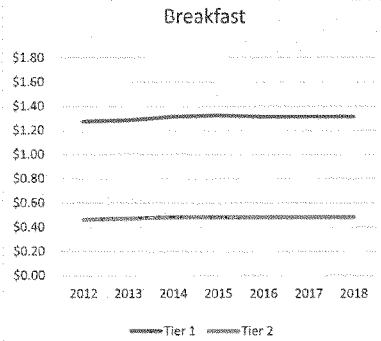
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**We support the continuation of the paperwork reduction work group.**

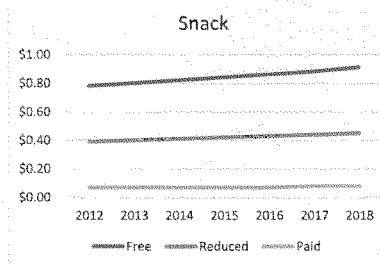
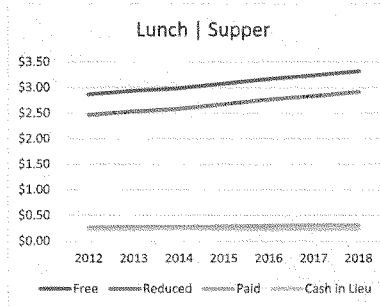
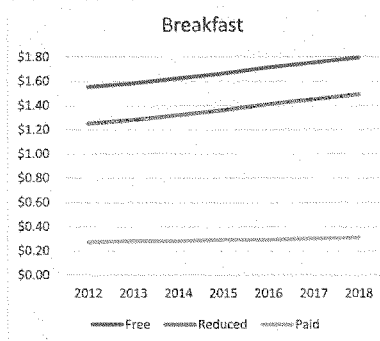
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## 20012-2018 CACFP REIMBURSEMENT RATES

### FAMILY HOME CHILD CARE



### CHILD CARE CENTERS




# Celebrating 50 YEARS

of the National School Lunch Act

In 1946, Congress enacted the National School Lunch Act so each child in child care programs. The goal was to encourage healthy eating habits by offering meals prepared by providers for serving nutritious meals. Initially, the CACFP reached about 21,000 children in family child care homes. Now, 50 years later, over 4.4 million children in homes, centers, and afterschool programs have access to healthy and nutritious foods every day. Throughout the CACFP's 50 year history, the program has continued to update its nutrition standards in cooperation with the USDA and parents and the Department of Agriculture's Dietary Guidelines. Without the CACFP, many children would not have access to nutritious foods. Not only do we celebrate this milestone for CACFP but we also praise each of you for your commitment to the well-being of each child in your care.

### 1968



Public Law established the Special Food Service Program for Children (SFPSC).

### 1975

Child Care Food Program and the Summer Food Service Program became separate programs.

### 1978


Public Law made the program permanent.

13,000 Family Child Care Providers participated.

### 1986

The National Sponsor Association was born. It became as the National CACFP Sponsors Association.

### 1987



Adult Day Care Facilities were added to the program.

### 1989


Name of program changed to the Child and Adult Care Food Program.

### 1998

Dr. Nick Anagnostou and Rosemarie Mathews became eligible.

### 1999

2.5 million children served in the CACFP.




### 2016

New Meal Patterns announced. First time since 1988 major changes were made to meal requirements.


### 2018

50 years later, serving over 4,000,000 children every day!



**NATIONAL CACFP ASSOCIATION**

The foundation for equal opportunity providers



**Know someone who isn't participating on the food program? Help them get reimbursed for serving nutritious meals. Contact them with [FeedASponsor.org](http://FeedASponsor.org)**

# NATIONWIDE



## KANSAS

"Children should have access to healthy foods while they are here because the more they will have them at a younger age, the more they will choose them at a later age," Erica Ritter program director of the YMCA, Olathe, Kansas, said. Christy Birt's 15-month-old daughter attends the YMCA day care. "It put my mind at ease," the 31-year-old human resources worker from Kansas City, said about the proposals being implemented. "So, if we are running around at night having to feed her something not as nutritious, then I know she received something nutritious while she was at day care."

[www.kcnews.com/health/kids-health/usda-proposes-healthier-food-daycares-n363716](http://www.kcnews.com/health/kids-health/usda-proposes-healthier-food-daycares-n363716)

## KENTUCKY

"Yesterday we started the after-school dinner program at our elementary," Jackie Ridsen-Smith said in a tweet about the Ashland schools. "While getting his food, a student smiled at his teacher and said, 'We haven't had a lot of food to eat at home ... now I won't be hungry tonight.' Child hunger is a real problem and we need more awareness." An after-school dinner program has been "a game changer for reducing childhood hunger in our community," she said. "Food insecurity among our youth is a basic need we must meet and although many are uncomfortable talking about this topic, we can't afford to not talk about it and continue to bring about awareness," said Ridsen-Smith. "Hunger is a distraction to learning." About 38,000 children in Kentucky are served daily in after-school supper programs, said Elizabeth Fiehler, child and adult care food program manager for the Kentucky Department of Education. While Kentucky is doing well in reaching hungry children, "we have a lot of room to grow," she said.

[www.kentucky.com/news/local/education/article225400560.html](http://www.kentucky.com/news/local/education/article225400560.html)

## SOUTH DAKOTA

Two Rapid City schools participating in a pilot program have served 6,000 free meals since December to students who stay after school for sports, tutoring and other extracurricular activities. The meals of chicken and rice, sandwiches, pizza, fruit, milk and other "enhanced snacks" are provided by a program... administered at the state-level through the USDA's Child and Adult Care Food Program. In order to qualify, 50 percent of students or more in a given school must be eligible to receive free or reduced-price meals. Schools must offer after-school programs. Eight school districts in South Dakota have Child and Adult Food Care programs in place, Cherie Watterson, a child and adult nutrition service administrator at the State Department of Education, said Wednesday. "There are many more universities, day care home sponsors, and tribal entities in addition to school districts," Watterson said in an email.

<https://rapidcityjournal.com/news/local/beatle-elementary-north-middle-piloting-after-school-meal-program>

**2,037,687,363 meals served in 2018 in CACFP.**



**103k**

Family Child Care Homes



**64k**

Child Care Centers



**22k**

Afterschool Sites



**2.5k**

Adult Day Care Sites



**Over 4.5 million children served each day.**

[www.cacfp.org](http://www.cacfp.org)

## Meet Ramona

Difficult life circumstances led Ramona Hursey to work in a child care center. She decided she would master her first “real job” working as an assistant and then move up the ladder until she was certified as a director. She realized along the way that she had found her true calling. Ramona opened her own child care home where she models her program on what she has learned and uses curriculum she has modified to fit the children enrolled instead of a generic routine.

Ramona’s biggest focus is making sure children are taken care of while their parents are at work, at school, or bettering themselves in some way. One of the keys is to focus on good nutrition where at times, she is serving the only food the kids will eat during the day. Ramona teaches the children about having a balanced meal and components that make a healthy diet. The older children go shopping at the grocery store with her and then everyone helps prepare the meal at home.

*“Someone stepped up for me. They took my hand. I want to be able to reach back and pull others up. Sometimes that is all people need.”*

Ramona focuses on small life skills that will help the children be more independent when they go to kindergarten. They work on listening and following instructions. Children are taught skills like how to open their own milk cartons and use their utensils. Most importantly, Ramona likes to sit with the children and simply have conversations, modeling how to speak and be with others. This helps even shy children find their voice so they can ask for what they need.



Ramona’s ultimate goal is to provide top quality child care for those that may not be able to afford it. Along with the children, she also cares for the families, many of which are single mothers. She wants to be a stepping stone for them. They work together as a family to better themselves, which ultimately benefits the children.

*Ramona Hursey Home Child Care Provider From Champaign, IL  
Ramona has been a CACFP participant for 20 years.*

## ILLINOIS CACFP



## Meet Michelle

When Michelle Baggett received a note from school stating her nephew was having a difficult time understanding his schoolwork, she immediately began tutoring. As he went from failing to passing, the idea grew of how much she enjoyed helping him and making a difference in a child's life. It was a calling she couldn't ignore, so she decided to discontinue her work in criminal justice and open her own home child care program.

*"I see that there is a real need for children to be taught in a quality program where parents do not have to worry about their children-knowing they are learning, having fun and are safe."*

Parents play a pivotal role in the program. Every other month, Michelle holds a parent advisory board meeting. Parents volunteer to come and are welcome to bring the kids with them. During the meeting, they participate in menu planning, assist with upcoming activities, and even try new group exercises. Each family also discusses their fruit and vegetable challenge from home where they have tasted new produce and share recipes.

Every summer, all the families meet for the big garden planting event. They each choose a few seeds to plant and tend to. The produce is then shared and eaten both at the home child care and at individual homes. The parent advisory board is even considering taking the garden to a new level, with a grant from the Board of Health, establishing a hydroponics garden growing fruits and veggies year-round.



As she begins transitioning children for kindergarten, she works with not only parents, but also with the teachers and schools that the kids will be entering. Michelle understands that by involving parents in her home child care and belonging to a community, the children know that everyone needs to work together to learn and grow. From this togetherness, Michelle has given the children the sense of security and confidence to keep moving forward throughout their learning.

*Michelle Baggett, Home Child Care Provider From Cincinnati, OH  
Michelle has been a CACFP participant since 2002.*

## OHIO CACFP



### Meet Janet

Janet Liebl started her child care career as an assistant in a local school. Recognizing an incredible opportunity to stay at home with her own three boys and fill a need in the community, Janet opened her home as an in-home child care. Seventeen years later, she continues with enthusiasm and is excited to go to work every day striving to go beyond the basics of standard preschool curriculum.

Janet believes there is always something to do that can play a part in the children's fundamental learning and take them beyond the standard curriculum. Janet enhances the preschool curriculum with small groups centers learning skills such as math with manipulatives and patterns, dramatic play, circle time, cosmic yoga, silly songs throughout the day and sign language. Because Janet feels it is very important to allow the 'kids to be kids', she takes them outside at every opportunity and dance parties are even incorporated into every day schedules.

In support of every child living a healthy lifestyle, Janet includes nutrition in her daily learning. The children not only discuss the benefits of nutritious foods, read books and use CACFP resources, but they are also hands-on in the kitchen cooking and preparing for mealtime. The children learn about nutritious choices and then contribute to making their own healthy choices at mealtimes. When they find a healthy recipe they enjoy eating, Janet makes sure to share it with parents so they can eat the food at home.



*"My goal is to support each child's individual growth and development by providing creative learning experiences in a home away from home atmosphere."*

Children are taught the Golden Rule and social skills. Janet works as a role model of good communication with all of the parents maintaining an open-door policy and sharing pictures of their children participating in various activities throughout the day. It is obvious that the love Janet shares with the children is reflected back as they grow into young men and women who still make time to come visit with her. Janet finds happiness most in seeing what wonderful humans the children have become and knowing she had a role to play to in their lives.

*Janet Liebl, Home Child Care Provider From Gary, MN  
Janet has been a CACFP participant since 2002.*

## MINNESOTA CACFP





### Meet Jennifer

Twenty-one years ago, Jennifer Stewart decided to open an informal home child care for her daughter, neighbors, and playmates. Even after her own children were grown, she still wanted to continue her child care home, but at a different level. In 2009, wanting more support from the state and to be able to apply for funding grants, Jennifer became a licensed operator. Then three years ago, joined the CACFP.

Jennifer has changed her philosophy about nutrition. The children's goal is to incorporate many colors of food on their plates and they now shop with Jennifer to pick out healthy foods. At the home they help choose menu items. Everyone has a 'try me bite' and Jennifer emphasizes all of the good things healthy foods do for their growing bodies. Parents are excited because not only are their children eating healthier at child care, they are also tasting new foods and choosing to eat healthier at home.

Nutrition adds a healthy component to the already active lifestyle the children lead at Jennifer's home child care where they are outside as much as possible walking to storytime, the firehouse and programs in the park. They take swimming lessons in the summer and go on scavenger hunts around town, often stopping to check out construction trucks and town happenings.



*"I was always serving typical toddler food and wanted support to help think outside of the box. The CACFP has taught me how to create nutritious meals for kids."*

Jennifer emphasizes this is the children's home away from home. On a daily basis, she enjoys the innocence and love that children share and takes pride in knowing that parents can leave children with her without worry because they are receiving the best care. Jennifer wants to take part in all of the little milestones along the way and hopes she can make a memorable difference in their lives.

*Jennifer Stewart, Home Child Care Provider From Sherburne, NY  
Jennifer has been a CACFP participant since 2015.*

## NEW YORK CACFP



## Meet Susan

Susan Holbrook always wanted to be a teacher and truly has found the best of two worlds. As a home childcare provider, she was able to not only teach, but also stay home with her own children. Twenty-seven years later, she continues to educate preschoolers and care for kids afterschool.

*"Some days can be difficult of course, but the next day the children come in with their sweet little faces and we start a new day of fun together."*

The goal at Susan's home is to produce happy, healthy, and kind children. Nutrition, of course, is a focus for healthy children. Incorporating the literature from her CACFP sponsor, Susan teaches the children about healthy eating choices and then sends home different information to build those habits. In the warmer months, the children tend to a home garden. Additionally, they take care of the chickens and eggs that are produced. During mealtimes, everyone works together to wash produce, clean up messes and even help plan upcoming menus.

Field trips to the library during the summer to participate in the library reading program is definitely a component for happy children. They spend many hours per week outdoors in the play yard and Susan has even incorporated a sunken boat into the ground. The children love to fish and be pirates! There is always fun to be had whether exercising, learning or playing.



Not only is Susan dedicated to her children's continuous improvement, but she strives to improve as well. Enrolling in Michigan's Great Start to Quality Program, Susan has completed extra continuing education hours, written a cultural plan and her own continuous improvement plan. She has even been awarded a grant in which she supplied her home childcare with a dramatic play kitchen set and other manipulatives for the kids to enjoy.

*Susan Holbrook, Home Child Care Provider From Crosswell, MI  
Susan has been a CACFP participant since 1998.*

## MICHIGAN CACFP



**Meet Linda**

*“Learning is natural. It allows children to feel accomplished and be full of pride when it comes from their own desires.”*

Imagine being able to help harvest the apples from the orchard, pick seeds and forage berries before the bears get them. As a home provider in rural Vermont, Linda Fisher is able to give the children in her care those actual opportunities. Since opening her doors in 1992, Linda has taken pride in being a “guardian of childhood” and allowing the children in her care to experience everything they can from nature

It is important for Linda to allow the children a safe place to explore and learn through play. She maintains a flexible schedule that allows them to determine their interests. The learning opportunities are developed from those interests and their ranging readiness levels, while also incorporating standard pre-k learning objectives.

Keeping conversation open is a key ingredient to learning. During family style meals, discussions around the table are about a wide degree of topics and all learn from each other.



As they watch each other taste new foods, the children are more inclined to do the same. They help with meal times and in food preparation as they are developmentally ready. Even nutrition education can come organically. Like in Linda's home, it does not have to be a formal process.

*Linda Fisher, Home Child Care Provider From Worcester, VT  
Linda has been a CACFP participant since 1999.*

**VERMONT CACFP**



### Meet Sandra

Sandra Jaeger saw a lifetime opportunity when she attended North Dakota State University and found they had a well-established and recognized Early Childhood Development program. Sandra had originally thought she would become an elementary teacher, but with this degree she realized a way to work with the younger children that she so enjoyed. Through her university program, Sandra established her teaching philosophy.

*“It is important to educate even the youngest children, not just have a play facility.”*

At Sandra's home childcare, she wants kids to have a home away from home with all of the learning opportunities a larger facility might have. Her goal is to keep children active with hands-on learning experiences. The curriculum focuses on a letter or learning theme each week and the learning takes place through music, art, cooking, and as much outdoor involvement as possible. Sandra stays current on needed kindergarten skills to ensure the children are ready to move on from her care.

Nutrition is emphasized through practical experiences. At Sandra's home the children plant and tend a garden. Each week they help with menu planning, take part in a cooking activity and help make their snacks almost every day. Recipes are requested from home and if Sandra can make them creditable, she makes them for all the kids to try.



Throughout the day, Sandra is creating a home-like atmosphere balancing learning, independence and fun. She wants children to be confident in their readiness skills and be able to meet new challenges. The joy Sandra finds in seeing them accomplish even the simplest tasks and gaining confidence to carry them to the next level helps her to love her work even more every day.

*Sandra Jaeger, Home Child Care Provider From Fargo, ND  
Linda has been a CACFP participant since 1998*

## NORTH DAKOTA CACFP



### Meet Cindy & Mickey

When one door closes another one opens. Cindy and Mickey took that expression to heart when they opened their own child care center after the large center where they were coworkers decided to close their doors. Twenty-three years later, they are still working together as co-teachers, co-owners of 'Lil Rascals Child Care. At 'Lil Rascals they strive to create a love of learning the children can take wherever they go.

In the search for the right fit for their group of students, Mickey and Cindy have discovered a nutritional program through the state of Colorado that works alongside CACFP to be beneficial. With the Food Friend Program, they encourage every child to try a new food and vegetable each week. Even Cindy has tried new foods she is not accustomed to! They further their nutrition education by planting a garden and going to a nearby apple orchard.

*“Every group of kids is different. We have to find what works for them and us as teachers to make everyone comfortable and able to learn.”*

Cindy and Mickey also use the Mighty Moves program for teaching physical education and understanding the important role it plays in a healthy lifestyle. The kids are encouraged to be outside as much as possible. This ranges from playing on a sledding hill in the winter to swimming in the summer. The kids have a climbing area, a place to ride bikes and play sports like soccer and basketball.



At Lil Rascals, it is important the children have a healthy, happy day. Cindy and Mickey use puppets to teach social emotional skills such as how to deal with frustrations and finding a solution for problems. With expectations increasing every year in school, children need to be well-rounded and prepared beyond academics. With all of the learning taking place each day, Cindy and Mickey feel accomplished and at the same time honored that parents entrust the children to their care.

*Cindy Whitaker & Mickey Geisler  
Home Child Care Providers From Cortez, CO  
Cindy and Mickey have been CACFP participants since 1994.*

## COLORADO CACFP



## Meet Caridad

*"I believe in the children and want to teach them. In order for them to learn, the first step in our day is to start with good nutrition. It helps them to be alert, active and ready to learn."*

Caridad Hernandez's home child care, every child is a part of her family and treated with love and affection. Through her fourteen years of child care, Caridad has gained much experience and makes her home a learning environment where children can live a healthy lifestyle both physically and mentally.

Caridad compares nutrition to the foundation of a home. If your foundation is not made of the correct components, the home cannot stand. At all mealtimes they eat together and discuss the importance of food as building blocks for their growing bodies. The children recognize food as their foundation for a strong healthy body and mind.

With the idea that childhood should be valued and not rushed, Caridad helps strengthen little hodies with physical activity. Children experience inside and outside activities like dancing and exercising, along with simple child play. They move around their community walking to the fire station, police station, and library. Mentally they are growing as they are constantly asking questions.



Caridad stresses the importance of family time both in her home child care family and with the children's home family. She leads by example by eating, playing and learning together with the children and asks that parents do as well. Along with the foundation of nutrition and Caridad's encouragement for learning, the children are both physically and mentally ready for their school years and life.

*Caridad Hernandez, Home Child Care Providers From Hazleton, PA  
Caridad has been a CACFP participant since 2004.*

## PENNSYLVANIA CACFP

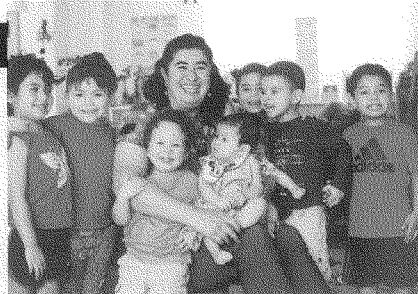


### Meet Maria

After immigrating to the United States from Columbia, Maria Claudia Ortega realized she could still have her dream of taking care of children through her own home child care. She immediately became licensed and opened her doors to My Little Geniuses. Eighteen years later, she continues educating and caring for children, working diligently to provide a safe, secure, and happy environment.

She wants to provide the children with opportunities to explore and develop their own unique individuality. Maria loves music and uses songs to teach the children preschool academics. She encourages physical activity through play, taking daily walks to the park and walking to the library frequently. There is a farm in the area where both the children and the parents spend time learning where food comes from, how to milk a cow and even how to gather eggs from a chicken.

Maria knows it is important to provide nutritional experiences. She teaches her children about gardening basics, and as the children gain experience and interest, she encourages them to cultivate tomatoes, lettuce, cilantro, and many other vegetables. The children get firsthand experience of the food cycle when the plants they grow appear on the dinner table. Their favorites are making homemade tomato sauce for pizza and incorporating their homegrown fruits and veggies into smoothies.



Maria uses MyPlate and her own experiences to educate parents. She holds two nutrition training classes a year. Last summer, she taught the parents about sugar, specifically the sugar in sodas and other sugary drinks. Every month she sends a recipe home and encourages parents to serve them hoping to reinforce what she has taught and encouraging good nutrition habits with the whole family. For Maria, this is one more way she can help establish a healthy environment for children.

*“Love is the most important part of caring for children. I hope that they will take what I teach them and the experiences that they have with me throughout their lives.”*

*Maria Claudia Ortega, Home Child Care Providers From Atlanta, GA  
Maria has been a CACFP participant since 2006.*

## GEORGIA CACFP

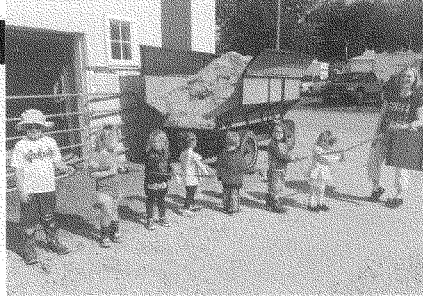


## Meet Angela

Angela Dobbs always felt her calling was in child care. She enjoys teaching and watching the children learn on a daily basis, picking up even the simplest of skills that we as adults take for granted. She is a dedicated child care professional that wants everyone in her care to learn and grow.

While the children are learning their foundations of letters, numbers, and shapes, they also focus on nutritional experiences. Throughout the year, they tend the garden and harvest the produce. The children also help in the kitchen making recipes ranging from complex veggie meatballs to easier sandwiches on "make your own sub day." Meals are served family style with everyone having their own small utensils and bowls to serve, while also practicing their manners passing plates and eating.

Angela goes above and beyond to expose the children to many different foods prepared in a variety of ways from kale to tofu. Although children may be hesitant to taste new foods, she finds success in simply renaming the food with a kid approved name or introducing regular foods that are different because of color, like maybe a purple carrot. Everyone is included in taste tests and big cheers are given when someone takes a bite of something they are hesitant to try.



*"The ultimate goal is to have everyone, even the babies, included in as many activities and experiences as we can while we shower them with love and attention."*

Angela takes on the new food guidelines as challenges she wants to master. She started trying different recipes to make whole grain bread, including whole grain pizza crusts and child size sub rolls. Her goal is to have the children like the healthier, creditable food options.

*Angela Dobbs, Home Child Care Providers From Cresco, IA  
Angela has been a CACFP participant since 2007.*

## IOWA CACFP





## Meet Jennifer

Jennifer Baumann was settling into her new life as a stay at home mom after moving to Chadron, NE. When friends and neighbors asked for help caring for their children, Jennifer decided to become licensed and open her own home child care. Little Angels Day Care has been open for almost 18 years and for Jennifer, it is all about the relationships that are built.

Instead of focusing solely on a standard curriculum, Jennifer uses the relationships she builds with her children along with observations to determine what needs to be done for each child. She allows for the children to learn through play and experience, even using the environment as a separate teacher. The children stay active and outside as much as possible.

*“Having relationships is the primary basis for this profession. Whether it is the relationships with children, their parents, or other providers it can all lead to different successes down the road.”*

Through family style meals all the children are involved in meal time providing another opportunity for relationship building and learning. They plan menus, help cook, serve themselves, and work on using real utensils from an early age. At meal times, an enthusiasm for food is role modeled where taste, texture and sight are all discussed. Jennifer abides by the theory that when you are serving and discussing good, nutritious food, eventually the kids will eat it.



Jennifer works to establish relationships within the CACFP child care community as well. She serves as the Co-President of the Panhandle Area Child Care Services, Member at Large for the Nebraska State Association, and maintains a Facebook support page. These are important relationships because everyone has something different to offer. As a child care provider, Jennifer feels she needs to continually learn from others and works to improve herself and what she offers as a provider.

*Jennifer Baumann, Home Child Care Providers From Chadron, NE  
Angela has been a CACFP participant since 2007.*

## NEBRASKA CACFP



## Identifying Cereal Sugar Limits

Here are three ways to determine if a breakfast cereal is within the CACFP sugar limit. As long as a breakfast cereal meets the sugar limit using **AT LEAST ONE** OF THESE METHODS described below, it is considered within the sugar limit.

### 1 WIC

If your State agency's Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) approves for a cereal brand for use in the program, it is CACFP creditable.

WIC

### 2 USDA

The USDA's National Center for Human Nutrition Research (NCHN) has established a list of cereals that are low in added sugar. The list includes a table with the serving size, the amount of added sugar, and the maximum amount of sugar the cereal can contain.

Serving Size (g)	Maximum Added Sugar (g)
30-33 grams	4 grams
33-36 grams	5 grams
36-39 grams	6 grams
39-42 grams	7 grams
42-45 grams	8 grams
45-48 grams	9 grams
48-51 grams	10 grams
51-54 grams	11 grams
54-57 grams	12 grams
57-60 grams	13 grams
60-63 grams	14 grams
63-66 grams	15 grams
66-69 grams	16 grams
69-72 grams	17 grams
72-75 grams	18 grams

### 3 Nutrition Facts Label

Check the Nutrition Facts label on the cereal box. The label will show the amount of added sugar per serving. If the amount of added sugar is less than or equal to the maximum amount of sugar allowed for the serving size, the cereal is CACFP creditable.

6g Sugar  
17g Serving = 0.353

GRAMS OF SUGAR PER SERVING: 6g (0.353)  
GRAMS OF CARB PER SERVING: 17g (0.353)

**Wheat Flakes**  
1/2 cup (42g) of cereal  
SUGAR 6g (12%)  
TOTAL CARBOHYDRATE 17g (34%)



**Product Example:** Dora the Explorer meets one of the three methods, therefore, this product is CACFP creditable.

Disclosure: This list is for informational purposes and does not imply endorsement by NCA or the USDA. The amount of sugar in a cereal might change. Even if you always buy the same brands and types of cereal, be sure to check the serving size and amount of sugars on the Nutrition Facts label to make sure they match what you have written in the list above. All cereals served must be whole grain-rich, enriched or fortified.

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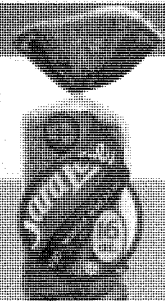
[cacfp.org](http://cacfp.org)

## Identifying Whole Grain-Rich

The USDA CACFP requires that at least one serving of grains each day contains a whole grain-rich component. Foods that meet the whole grain-rich criteria are foods that contain at least 50% whole grains and the remaining grains in the food are enriched, or are 100% whole grain.

Here are a few ways to help identify if a product is whole grain-rich. As long as the product meets AT LEAST ONE OF THESE SIX METHODS, described below, it is considered whole grain-rich.

1. The label on the product contains a statement such as "whole grain" or "whole wheat" and which conforms to an FDA Standard of Identity. An FDA Standard of Identity is a set of rules for what a product must contain to legally be labeled with that product name. (For available standards, visit [www.fda.gov](http://www.fda.gov))



**WIC** - The product is found on WIC State agency's Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) approved whole grain food list. Any grain product found on a State agency's WIC-approved whole grain food list meets CACFP whole grain-rich criteria.

Triscuit

Due to the following statements included on the labeling:

"Whole grain in whole grain breads and other grain foods may help lower the cholesterol, fat, and cholesterol may reduce the risk of heart disease and some cancers."

"Whole grain in whole grain breads and other grain foods, and fiber in associated fat and cholesterol, may help reduce the risk of heart disease."

Goldfish

Whole Grain - Top Grain Ingredients

**INGREDIENTS:** Whole Wheat Flour, Enriched Wheat Flour (Flour, Niacin, Reduced Iron, Thiamine Mononitrate, Riboflavin, Folic Acid), Vegetable Oil (Carnauba Wax), Or Hardwood, Chocolate Chips (Cocoa and Milk, Salt, Sugar), L-Ascorbic Acid, Contains 2 Percent Or Less Of: Yeast Extract, Natural Flavors, Paprika, Spices, Ethanol, Baking Soda, Monosodium Phosphate, Enriched Oat Flour, Annatto Extract For Color. [www.nca.org](http://www.nca.org)

Use of the National School Lunch Program whole grain-rich criteria may vary when planning and purchasing for at-risk afterschool or CACFP child care programs. The NCA's whole grain-rich criteria apply for all grain products with the exception of gluten-based products, which are not allowable under CACFP.

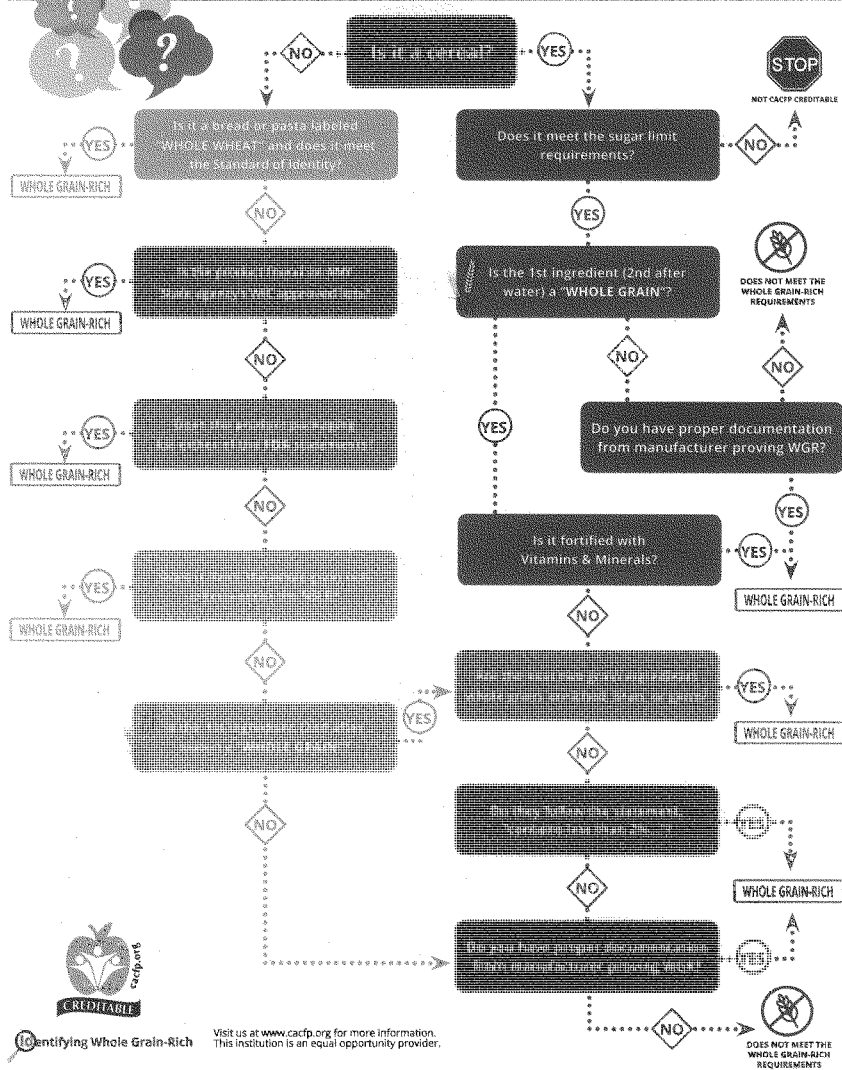
Proper documentation from a manufacturer on a standard test method can also demonstrate that whole grains are the primary grain ingredient by weight.



Visit us at [www.cacfp.org](http://www.cacfp.org) for more information. This institution is an equal opportunity provider.

This guide is meant to be used to identify CACFP Credible **WHOLE GRAIN-RICH** products. Reference NCA's Identifying Grain Ingredients for list of creditable grains.

## Wondering if your food is **WHOLE GRAIN-RICH?**



# IS YOUR YOGURT CACFP Creditable?

## How to identify if your yogurt is within the Sugar Limit

**Step 1** Use the Nutrition Facts label to find the Serving Size, in ounces (oz) or grams (g), of the yogurt.

**Step 2** Find the Sugars line. Look at the number of grams (g) next to the sugars.

**Step 3** Using the Serving Size identified in Step One, find the Serving Size of the yogurt in the table below.

Sugar Limits in Yogurt

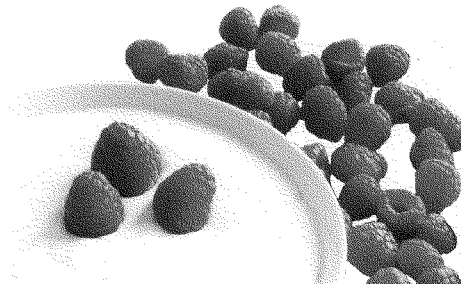
SERVING SIZE OUNCES (OZ)	SERVING SIZE GRAMS (G)	SUGARS
If the serving size is:		Sugars cannot be more than:
2.25 oz	64 grams	9 grams
3.5 oz	99 grams	13 grams
4 oz	113 grams	15 grams
5.3 oz	150 grams	20 grams
6 oz	170 grams	23 grams
8 oz	227 grams	31 grams

**Step 4** Once you have identified the Serving Size, look at the number to the right under the "Sugars" column.

**If the yogurt has that amount of sugar, or less, your yogurt meets the sugar requirement.**



**Tip:** If the serving size says "one container," check the front of the package to see how many ounces or grams are in the container.



sample yogurt

### Nutrition Facts

Serving Size 1 cup (227g)  
Servings per container 4

Amount Per Serving  
Calories 150 Calories from Fat 15

	% Daily Values **
Total Fat 1.5g	3%
Saturated Fat 1g	5%
Trans Fat 0g	
Cholesterol 10mg	3%
Sodium 100mg	4%
Potassium 310mg	9%
Total Carbohydrate 39g	13%
Sugars 18g	
Protein 6g	12%

Vitamin A 20% • Calcium 20%  
Vitamin D 20% • Phosphorus 15%  
Not a significant source of Dietary Fiber, Vitamin C and Iron.

\*\* Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs.

	Calories	2,000	2,500
Total Fat	Less than	65g	80g
Sat Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Potassium		3,500mg	3,500mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g
Protein		50g	65g



NATIONAL CACFP SPONSORS ASSOCIATION

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**LEARN IT**

**How does your garden grow?**

Every garden must start with a seed, but how does that seed become the plants we can cook and eat in our homes? This is a fantastic opportunity to teach the children in your care what a seed is, examples of seeds, and what those seeds need to become strong, healthy plants that we can harvest.



**MAKE IT Garden Printing**

Sometimes the best art can be created without a paint brush! Cut various vegetables from your garden such as carrots, peppers, squash, zucchini, eggplant, and potatoes in half so they can be used as a stamper. Make the children a paint pallet with different colors. Ask them to stamp the vegetables in the paint and then they can make their work of art on a large piece of construction paper.



**PLAY IT Garden Turnover**

Divide the children into equal groups, each with a unique vegetable name. Have them sit in chairs forming a large circle, with one child starting the game as the center. When the child in the center calls out one of the vegetable names, those children get up and try to find a new chair as the center tries to steal a seat. The child left standing calls out a new vegetable and the game repeats. If the center child calls out "Garden Turnover!" all the children get up to find a new seat.



**SING IT Bingo Was His Name O**

There was a farmer who had a dog,  
and Bingo was his name O!  
B-I-N-G-O, B-I-N-G-O, B-I-N-G-O,  
and Bingo was his name O!



**GROW IT**

**Container Gardening**

Not everyone has the space to plant an elaborate garden. That's okay! You can still have a garden with a container garden. Tires, buckets, large planting pots, or even tubs can all be used as your container. Hanging baskets are great for fruits like strawberries, cherry tomatoes and herbs. Plastic containers will hold in moisture better than a clay or wood container.

Fill the container with gardening soil and begin planting. Remember to check plants daily for watering needs and support your fast growing, tall plants with trellises and stakes. Plant ideas for container gardens:

- |           |           |          |
|-----------|-----------|----------|
| Beans     | Broccoli  | Carrots  |
| Cucumbers | Eggplants | Lettuce  |
| Onions    | Peppers   | Radishes |
| Tomatoes  |           |          |

**EAT IT Garden Stir Fry**

- 1/2 cup low sodium chicken broth
- 1/2 tablespoon of corn starch
- 1 teaspoon soy sauce
- 1 tablespoon sesame or olive oil
- 2 tablespoons garlic minced
- 5 cups of your favorite garden vegetables
- 3 1/3 cups diced chicken
- Whole Grain Rice



Mix together the broth, cornstarch and soy sauce and set aside. Add oil to a large pan and sauté the garlic on high heat for one minute. Add the vegetables and cook for eight minutes until tender. Add the soy sauce mixture and reduce heat to medium. Continue cooking until the sauce thickens. Serve over 1/4 cup cooked whole grain rice for each child.

*Lunch Crediting:  
10 Servings (1/2 cup)  
for ages 3-5 (Vegetable/Meat/Grain)*



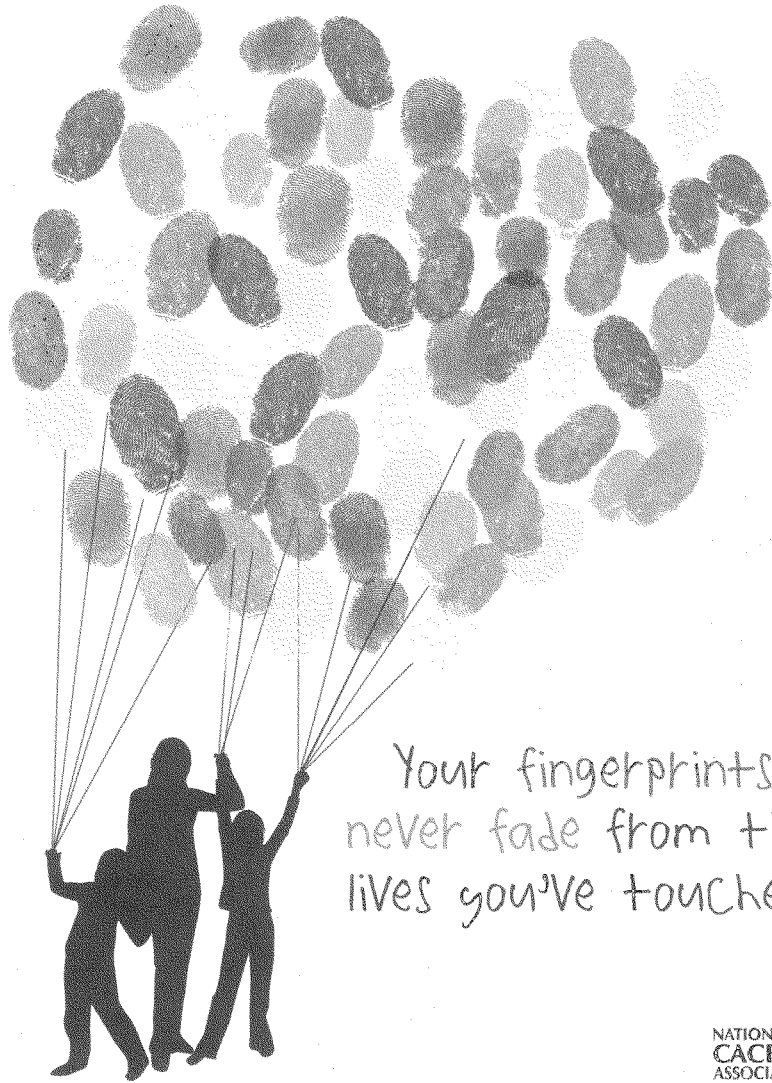
**READ IT**

**Growing Vegetable Soup** by Lois Elhert

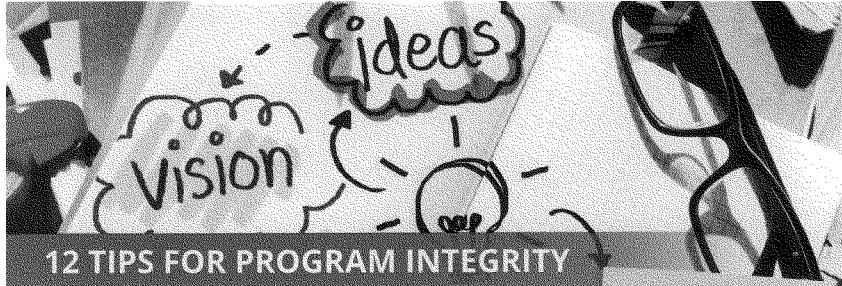
This easy to understand book with bold pictures talks about necessary gardening tools, gardening chores and what happens after harvesting. A recipe for vegetable soup is included! Maybe you can use produce from your own garden to make a batch of soup to share with the children.

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This institution is an equal opportunity employer.  
Learn more @ cacfp.org





Your fingerprints  
never fade from the  
lives you've touched.



## 12 TIPS FOR PROGRAM INTEGRITY

**Planning meals** in advance will help ensure that you have what you need available to be in compliance with the CACFP meal pattern. Work with your sponsor to be sure that your meals meet requirements before the meal service.

*Always review how you have been paid by your sponsor and always ask questions if you think the amounts are not correct.*

**Understanding food program requirements,** and updating your sponsoring organization or state agency with changes in your meal service or license status for child care is very important.

**Milk is an important component** for the meal service. Be sure you are serving the correct milk to the correct age group based on the new meal pattern requirements. It is also important to purchase enough milk for the age groups in your child care so as not to lose reimbursement.

**Attendance records** should be maintained daily, and should support the number of meals claimed for reimbursement. An attendance record is not a meal record.

**Facilities must have documentation** of a child's enrollment, signed by a parent or guardian, and indicating the normal days and hours of care and the normal meals served. Enrollment documentation must be updated annually. At-Risk Afterschool sites and homeless shelters are excluded from this requirement.

**Payments rates** are determined in several different ways depending on the income level of the families you serve. In some cases you will receive what is called categorical eligibility and in other instances you may collect income forms from parents. Be sure you work with your sponsor to obtain the best payment rate you will be entitled to receive.

**Child care centers,** remember to record meals at the "point of service". This means when the child is served a meal, not before, and not later in the day. If you record online be sure to maintain any source documents for review.

*Training is an important component of the CACFP requirement. Be sure to obtain your annual regulatory training for CACFP.*

**CACFP records** must be kept for three years, plus the current year. Keep copies of any records you submit for food program participation and back up electronic copies securely.

**Payment information** from parents is confidential and must be protected. Income forms from parents must be completed by the parent and not tampered with by the home provider, center provider or sponsoring organization. Income forms are good for one year.

*let's talk money*

**Family child care,** remember to record your meals daily. If you record online be sure to maintain any source documents for review.





## KEEPING BUSINESS RECORDS

Like with any other small business owner, family child care providers are required by the Internal Revenue Service (IRS) to keep records of all incoming and outgoing expenses. Keeping a good, organized account of income and expenses will help you file accurate tax returns at the end of the year. Record-keeping is not only necessary for tax purposes, you can use them to determine if your tuition rates are enough to maintain your desired level of net profit. This will help you review the progress of your business and help you plan for the future.

**RECORD TUITION**  
Record any funds coming in (i.e. tuition) and going out (i.e. toy purchase) on a monthly basis. As purchases are made, remember to record the date, place of purchase, check number, and the type of purchase. It is important to keep all of your receipts, whether you pay with cash, credit card, or check.

**RECORD UTILITIES AND HOME EXPENSES**  
Record your monthly utility and home expenses such as electric, trash, and other categories from IRS Form 8829. Record the date paid and the dollar amount spent on the utility or home expense. Keep a copy of the check or payment confirmation with the billing statement.

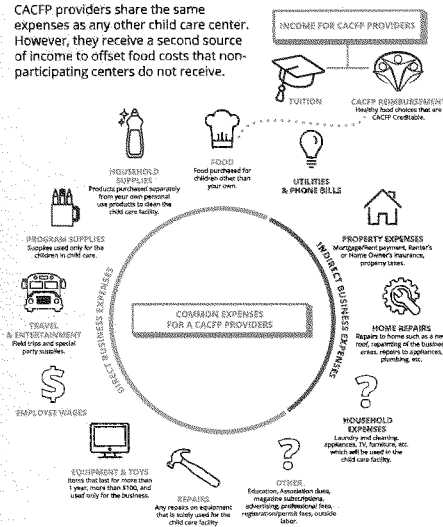
**RECORD BUSINESS FOOD EXPENSES**  
Business food expenses can be calculated for tax purposes in two ways. You can claim your actual business food costs (by saving all business and personal food receipts) or you can use the Standard Meal Allowance method. With this method, you keep track of all meals and snacks served to children in your care, not just CACFP-reimbursed meals and snacks. You can claim up to one breakfast, one lunch, one dinner, and three snacks per child per day for tax purposes. Do not include meals and snacks served to your own children or other residential children, even if income eligible.

The CACFP requires that you keep accurate daily records on the foods you offer and the children you serve each day to earn your reimbursement.

Go to [cacf.org](http://cacf.org) for more information.  
CACFP is a requirement of receiving Child Care  
Reimbursement as a provider opportunity provider.

### INCOME VS. EXPENSES

CACFP providers share the same expenses as any other child care center. However, they receive a second source of income to offset food costs that non-participating centers do not receive.



### SOURCE DOCUMENTS

It is imperative that you find an efficient way to organize all source documents such as receipts, utility bills, bank statements, credit card statements and checks. Set up a system to file each in a folder, envelope, or file labeled with the name of that category. For example, a receipt from the local grocery store would go in a file titled Food Expenses. The receipt from a toy store would go in a file titled Toys and Equipment. Make sure to mark if the items were business or shared between personal and business before filing them away. The IRS recommends keeping records for three previous years, plus the current year.





## Serve Tasty and Healthy Foods in the Child and Adult Care Food Program (CACFP)

Sample Meals for Children Ages 1-2

**What is in a Breakfast?**

Milk (4 fl. oz. or ½ cup)  
Meat/Meat Alternate (1 oz. eq.)  
Vegetables (½ cup)  
Fruit (½ cup)  
Grains (½ serving)

½ cup Oatmeal

½ cup Diced Peaches

½ cup 1-year-olds: Unflavored whole milk  
2-year-olds: Unflavored low-fat (1%) or fat-free (skim) milk

**Sample Breakfast**

**Grilled Cheese Sandwich**  
Made with ½ serving Enriched Bread and 1 oz. Cheese

½ cup 1-year-olds: Unflavored whole milk  
2-year-olds: Unflavored low-fat (1%) or fat-free (skim) milk

½ cup Broccoli

½ cup Blueberries

**Sample Lunch/Supper**

**What is in a Lunch or Supper?**

Milk (4 fl. oz. or ½ cup)  
Meat/Meat Alternate (1 oz. eq.)  
Vegetables (½ cup)  
Fruit (½ cup)  
Grains (½ serving)

All grains served must be whole grain-rich or enriched.  
Breakfast cereals may also be fortified.  
At least one grain served each day must be whole grain-rich.

Offer and make water available all day.

**What is in a Snack?**

Pick 2:  
Milk (4 fl. oz. or ½ cup)  
Meat/Meat Alternate (½ oz. eq.)  
Vegetables (½ cup)  
Fruit (½ cup)  
Grains (½ serving)

Yogurt Dip  
Made with ½ cup (2 oz.) Yogurt

Yogurt must not contain more than 23 grams of sugar per 6 oz.

½ cup Bell Pepper Strips

**Sample Snack**

Note: Serving sizes are minimums.  
Updated USDA Child and Adult Care Food Program (CACFP) meal patterns must be implemented by October 1, 2017. Learn more about the CACFP meal patterns, including information on ounce equivalents (oz. eq.) and serving sizes at <https://teammnutrition.usda.gov>.





United States Department of Agriculture

## Serve Tasty and Healthy Foods in the Child and Adult Care Food Program (CACFP)

September 2017 to August 2018

### Breakfast?

**Sample Breakfast**

- 1/2 serving Whole Grain-Rich Mini Pancakes
- 1/2 cup Unflavored Low-Fat (1%) or Fat-Free (0.0%) Milk
- 1/2 cup Seed Strawberries

**Sample Lunch/Supper**

- 1 Taco Made with: 1 1/2 oz. Lean Ground Beef, 1/4 cup Lettuce\*, and 1/2 cup Chopped Tomatoes
- 1/2 serving Enriched Flour Tortilla
- 1/4 cup Unflavored Low-Fat (1%) or Fat-Free (0.0%) Milk
- 1/4 cup Roasted Sweet Potatoes

A second, different vegetable tray can be served in place of fruit in lunch and supper. In this case, use 1/2 cup of lettuce and 1/2 cup of tomatoes in the taco instead of the vegetable component, and use 1/2 cup of sweet potatoes to meet the fruit component.

\*Low fat! greens, such as lettuce, credit for half the amount served. The 1/4 cup of lettuce in the taco counts as 1/2 cup of vegetables in the meal.

### What is a Lunch or Supper?

- Milk: 1/4 cup or 1/2 cup
- Meat/Meat-Alternate: 1 1/2 oz. eq.
- Vegetables: 1/2 cup
- Fruit: 1/4 cup
- Grains: 1/2 serving

All grains served must be whole grain-rich or enriched. Breakfast cereals may also be fortified. At least one grain served each day must be whole grain-rich.

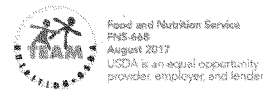
Offer and make water available all day.

### What is a Snack?

**Sample Snack**

- 1/2 cup Apple Slices
- 1/2 oz. Cheddar Cheese

Note: Serving sizes are minimums.  
 Updated USDA Child and Adult Care Food Program (CACFP) meal patterns must be implemented by October 1, 2017. Learn more about the CACFP meal patterns, including information on ounce equivalents (oz. eq.) and serving sizes at <https://teamnutrition.usda.gov>.





United States Department of Agriculture

# Serve Tasty and Healthy Foods in the Child and Adult Care Food Program (CACFP)

**Breakfast?**

**1 cup**  
Low-Fat (1%)  
or Fat-Free (Skim) Milk  
(Unflavored or Flavored)

**1 Banana**

**1 serving**  
Whole Grain-Rich Cereal  
Breakfast cereals must contain no  
more than 6 grams of sugar  
per dry ounce.

**Sample Breakfast**

**What is in a Lunch or Supper?**

Milk: 8 fl. oz. or 1 cup  
Meat/Meat Alternatives: 2 oz. eq.  
Vegetable: 1/2 cup  
Fruit: 1/2 cup  
Grains: 1 serving

**1 cup**  
Low-Fat (1%)  
or Fat-Free (Skim) Milk  
(Unflavored or Flavored)

**Chicken Stir-Fry**  
Made with  
2 oz.  
Chicken Breast and  
1/2 cup  
Mixed Vegetables

**1/2 cup**  
Watermelon  
Chunks

**1/2 cup**  
Brown Rice

**Sample Lunch/Supper**

All grains served must be whole grain-rich or enriched.  
Breakfast cereals may also be fortified.  
At least one grain served each day must be whole grain-rich.

**What is in a Snack?**

**1 serving**  
Crackers

**1/2 cup**  
Mandarin  
Oranges

**Sample Snack**

Offer and make water available all day.

**Note:** Serving sizes are minimums.

Flavored low-fat (1%) milk is allowed for children ages 6 and older and adults in the CACFP from July 1, 2016, until June 30, 2019, and is subject for updates pending *Final Rule for Child Nutrition Programs: Flexibilities for Milk, Whole Grains, and Sodium Requirements*. Learn more about the CACFP meal patterns, including information on ounce equivalents (oz. eq.) and serving sizes at <https://teamnutrition.usda.gov>.



Food and Nutrition Service  
FNS-669  
Slightly Revised June 2018  
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## Serve Tasty and Healthy Foods in the Child and Adult Care Food Program (CACFP)

Sample Meals for Adults

### What is in a Breakfast?

Milk (8 fl. oz. or 1 cup)  
Meat, Meat Alternate (2 oz. or 1/2 cup)  
Vegetables (1/2 cup)  
Fruit (1/2 cup)  
Grains (2 servings)

1 Large Egg Scrambled

1/2 cup Fruit Salad

1/4 cup (6 oz.) Yogurt

For Adult Participants Only

- 3/4 cup (6 oz.) of yogurt may be used to meet the milk requirement, when yogurt is not served as a meat alternate in the same meal.
- Yogurt must not contain more than 23 grams of sugar per 6 oz.

Sample Breakfast

1 cup Low-Fat (1%) or Fat-Free (0%) Milk (Unflavored or Flavored)

Tuna Salad Made with 2 oz. Tuna

1/2 cup Red Grapes

Salad Made with 1/2 cup Lettuce, 1/2 cup Tomatoes, and 1/2 cup Carrots

2 servings Whole Grain-Rich Pita Bread

Sample Lunch/Supper

### What is in a Lunch or Supper?

Milk (8 fl. oz. or 1 cup)  
Meat/Meat Alternate (2 oz. or 1/2 cup)  
Vegetables (1/2 cup)  
Fruit (1/2 cup)  
Grains (2 servings)

All grains served must be whole grain-rich or enriched.  
Breakfast cereals may also be fortified.  
At least one grain served each day must be whole grain-rich.

Offer and make water available all day.

### What is in a Snack?

1/2 cup (2 oz.) Cottage Cheese

1/2 cup Cherry Tomatoes

1/2 cup Cucumber Slices

Sample Snack

Note: Serving sizes are minimums.

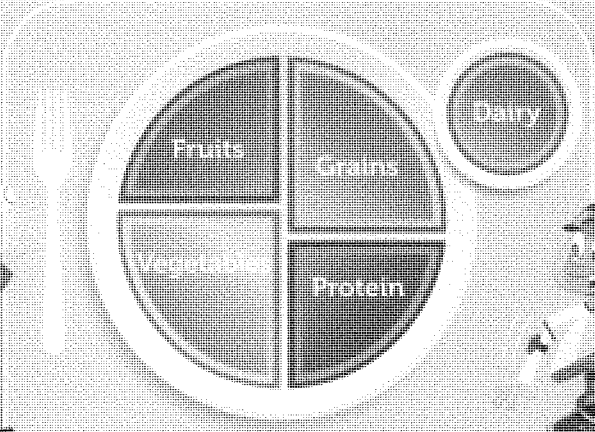
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Food and Nutrition Services  
FNS-670  
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# Eat Smart To Play Hard

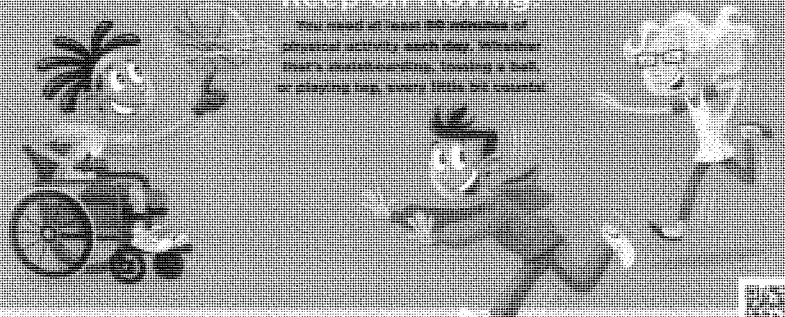
Use **MyPlate** to help you fuel up with foods from each food group.




Choose **MyPlate** gov

## Keep on Moving!

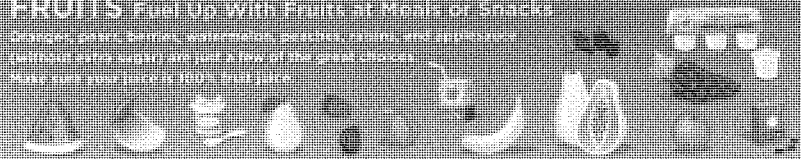
You need at least 60 minutes of physical activity each day. Whether that's stretching, taking a walk, or playing tag, every little bit counts!



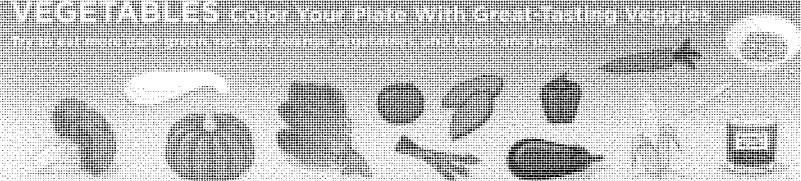
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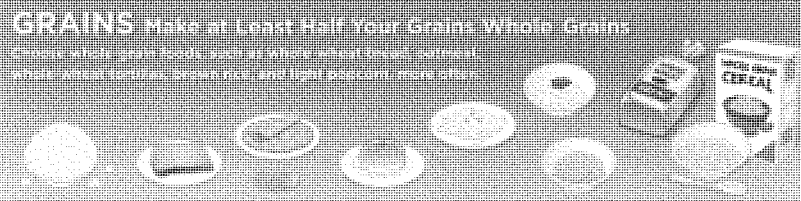
**FRUITS** Fuel Up With Fruits at Meals or Snacks  
 Oranges, pears, berries, watermelon, peaches, plums, and apples are full of fiber and vitamin C. Make sure you get your daily fruit intake. Make sure your juice is 100% fruit juice.




**VEGETABLES** Color Your Plate With Great-Tasting Veggies  
 Try to eat more dark green, red, and orange vegetables, and beans and peas.



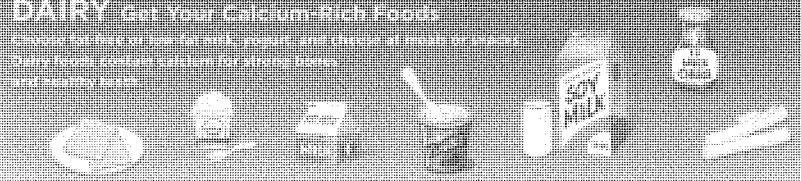
**GRAINS** Make at Least Half Your Grains Whole Grains  
 Choose whole grain foods, such as whole wheat bread, oatmeal, whole wheat pasta, brown rice, and light-colored rice.



**PROTEIN** Vary Your Protein Foods  
 Eat fish, shellfish, beans, and peas more often. Some easy ways include a bean burrito, hummus, veggie chili, lentil soup, lentil or soy patties, or grilled salmon.



**DAIRY** Get Your Calcium-Rich Foods  
 Choose fat-free or low-fat milk, yogurt, and cheese at meals or snacks. Dairy foods contain calcium for strong bones and healthy teeth.



**Know Your "Sometimes" Foods** Look out for foods with added sugars or solid fats. They fill you up so that you don't have room for the foods that help you eat smart and play hard.

American Academy of Pediatrics

DEDICATED TO THE HEALTH OF ALL CHILDREN™



**Testimony of Olanrewaju Falusi, MD, FAAP**

**Pediatrician, Children's National Health System and Past President, American Academy of Pediatrics D.C. Chapter**

On Behalf of the American Academy of Pediatrics

**Before the U.S. Senate**

Committee on Agriculture, Nutrition, & Forestry

**"Perspectives on Child Nutrition Reauthorization"**

**April 10, 2019**



Chairman Roberts and Ranking Member Stabenow, thank you for the opportunity to testify here today. I am Dr. Olanrewaju Falusi, a pediatrician at Children's National Health System here in D.C. and Past President of the DC Chapter of the American Academy of Pediatrics, or AAP. On behalf of the AAP, a non-profit professional organization of 67,000 primary care and subspecialty pediatricians, thank you for inviting me to be here today.

As a practicing pediatrician, I see the benefits of consistent access to nutritious foods on the health and development of children. In my practice, I have been screening for food insecurity in my clinic for several years, and a significant percentage of families that I see are experiencing food insecurity. I see children whose parents work 2 or 3 jobs and still struggle to put food on the table. I see families who live in neighborhoods that are food deserts, where they can get fast food on any block but have to take 2 buses to get to the nearest grocery store. And I recently met a mom who just the week before had left an abusive relationship, was staying on a friend's couch with her child, and did not have access to cook nutritious and balanced meals.

Here at Children's National Health System, we are very fortunate to have Special Supplemental Nutrition Program for Women, Infants, and Children – or WIC – clinics co-located with our medical clinics. I can walk a family down the hall to our WIC clinic rather than having them take another day off work to go to a separate site; co-location allows for collaboration and communication between our health care providers and WIC staff; we can be sure that we have consistent messaging around healthy food and beverage consumption; and particularly for new moms, the breastfeeding promotion and lactation support can help a mom reach her breastfeeding goals. The benefits of having a co-located WIC clinic cannot be overstated. In fact, I credit WIC for the health of my patient – who I'll call David – whose developmental delays at 3 years of age made it very difficult for him to chew solid foods. He was really struggling, underweight, with poor developmental skills, when I first met him. We got him connected into regular visits with our co-located WIC clinic to provide him with a special high-calorie milk and balanced diet with fresh fruits and vegetables, which took an enormous stress off his mother. She can now be sure that her son is not going to school hungry, and he is now able to focus on learning fine motor and cognitive skills. I am proud to say that now he is thriving and has reached a healthy weight.

On behalf of David and all of my patients, thank you for your support of critical federal child nutrition programs in the United States, including WIC, the National School Lunch Program (NSLP) and School Breakfast Program (SBP), the Child and Adult Care Food Program (CACFP), and the Summer Food Service Program (SFSP). All of these programs and others are effective in reducing food insecurity and promoting access to healthy, nutritious foods among children and their families.

### ***Health Effects of Food Insecurity***

Today, 1 in 6 children live in poverty, and nearly half of all children live in low-income households.<sup>i</sup> Households with children are nearly twice as likely to be food insecure as households without children. Decades of research has documented the adverse health effects of food insecurity on the health, growth, development, and educational outcomes of children from infancy through adolescence. Infants and toddlers living in food-insecure families are significantly more likely to be in fair or poor health, be hospitalized and have longer hospital stays, suffer from iron-deficiency anemia and common illnesses, and be at-risk for developmental delays compared to young children living in food-secure families.<sup>ii,iii,iv,v,vi</sup> Among school-aged children, food insecurity is associated with lower math and reading scores, hyperactivity and absenteeism and tardiness at school.<sup>vii,viii,ix,x</sup> Some longitudinal studies have found food insecurity increases the risk of obesity or being overweight among children.<sup>xi,xii</sup> Food insecurity in childhood not only affects children's short-term health, development and learning, but has also been associated with long-term health consequences including an increased risk of chronic conditions such as heart disease and obesity in adulthood.<sup>xiii</sup>

The inability to consistently provide food creates stress in families, contributing to depression, anxiety, and toxic stress, which make optimal parenting difficult regardless of social class<sup>xiv</sup>. Toxic stress, a result of prolonged exposure to adverse childhood experiences in the absence of caring, stable relationships with adults, can affect the physical, mental, and economic well-being of children well into adulthood.<sup>xv</sup> The inability to provide food for yourself or your children creates stress in families, and contributes to depression, anxiety, and other emotional impacts of poverty.

Like poverty, food insecurity is a dynamic, intensely complex issue. For many families, seemingly small changes to income, expenses, or access to federal or state assistance programs may instantly reduce the ability to purchase healthy food and result in increased vulnerability to food insecurity.

Federal nutrition programs are a critical protection against the adverse health effects of food insecurity in children.

### ***Early Nutrition as a Critical Factor in Childhood Development and Adult Health***

Maternal prenatal nutrition and the child's nutrition in the first 2 years of life (1,000 days) are crucial factors in a child's neurodevelopment and lifelong mental health<sup>xvi</sup>. Child and adult health risks, including obesity, hypertension, and diabetes, may be programmed by nutritional status during this period<sup>xvii</sup>. Optimal overall brain development in the prenatal period and early years of life depends on providing sufficient quantities of key micronutrients (e.g. iron and folate) during specific sensitive time periods. These periods coincide with the times when

specific brain regions are developing most rapidly and have their highest nutrient requirements.<sup>xviii</sup>

Important primary structures and processes that support fundamental behaviors and provide scaffolds for later-developing structures form during the first 1,000 days<sup>xix</sup>. These structures and processes include the sensory systems (especially auditory and visual), the hippocampus (declarative learning and memory), myelination (speed of processing), and the monoamine neurotransmitter systems (affect and reward). Even the prefrontal cortex (planning, attention, inhibition, multitasking) and brain circuits involved in social development have the onset of rapid development in the first 1,000 days. Although neurodevelopment continues throughout the life of a healthy person, by age 2 years the brain has undergone tremendous restructuring. Many of the developmental changes expected to occur during this period will not be able to occur in later life. Failure to provide key nutrients during this critical period of brain development may result in lifelong deficits in brain function despite subsequent nutrient repletion.<sup>xx</sup>

Micronutrients such as iron and folate affect brain development and are commonly deficient in pregnant women and young children in the U.S. These deficiencies can lead to delays in attention and motor development, poor short-term memory, and lower IQ scores.<sup>xxi</sup> Restricted diets because of poverty or neglect may reduce infant intake of many key factors in normal neurodevelopment, including zinc, protein, and iron.<sup>xxii</sup>

Macronutrient (protein, fat, glucose) sufficiency is essential for normal brain development. Early macronutrient undernutrition is associated with lower IQ scores, reduced school success, and more behavioral dysregulation.<sup>xxiii</sup> Intervention in early nutritional deficiency can be effective, and the full effects may be felt for many years. In addition to generalized macronutrient undernutrition, deficiencies of individual nutrients may have a substantial effect on neurodevelopment.<sup>xxiv</sup> Prenatal and early infancy iron deficiency is associated with long-term neurobehavioral damage that may not be reversible, even with iron treatment.<sup>xxv</sup> Severe maternal iron deficiency, limited maternal-fetal iron transport (associated, for example, with cigarette smoking or maternal hypertension), or conditions that increase fetal iron demand (such as maternal diabetes) may lead to newborn iron deficiency and associated long-term cognitive deficits.<sup>xxvi</sup> The earlier the timing of the deficiency, the more likely long-term effects will occur, probably because structure and regulation of genes involved in neural plasticity have been significantly altered.<sup>xxvii</sup>

Data from animal and human studies indicate that two experiences relatively common in pregnancy – an unhealthy maternal diet and psychosocial distress – significantly affect children’s future neurodevelopment. Prenatal exposure to maternal distress and poor nutrient status are associated with decrements in neurocognitive development, particularly in relation to memory and learning, and specifically with regard to variation in the structural, functional, and neurochemical aspects of the hippocampus.<sup>xxviii</sup>

Pregnancy through the first 2 years postpartum may be seen as a time of tremendous opportunity for neurodevelopment and a time of great vulnerability. This time period is one of rapid physical, cognitive, emotional and social development and because of this, it can set the stage for a lifetime of good health and success in learning and relationships, or it can be a time when physical, mental and social health and learning are compromised. In infants and children, toxic stress, emotional deprivation, and infection or inflammation have been shown to be associated with less optimal brain development, and a deficient diet for the child can worsen this. The effects of early adverse experiences, like food insecurity, may be a lifetime of medical and psychosocial problems, lost academic achievement and productivity, and possible effects on the next generation. These long-term issues are the true cost to society, a cost that exceeds that of preventing them, emphasizing the importance of recognizing the developmental origins of adult health and disease<sup>xxx</sup>.

### ***Effective Programs and Strategies***

#### ***Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)***

One of the most effective investments Congress can make during the prenatal to school-aged period is to support the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). I thank the committee for its strong, bipartisan support for WIC over the past 4 decades.

WIC provides nutritious foods, nutrition education, breastfeeding support, and referrals to health care and social services for millions of low-income women, their infants, and young children who are determined to be nutritionally at-risk. As such, it is the most important program providing nutritional support in the first 1,000 days. In providing this nutrition support and linkages with health care, WIC builds good health and promotes resilience in families at risk, helping to mitigate the effects of toxic stress.

WIC helps give children a healthy start at life, and children who receive WIC have improved birth outcomes, increased rates of immunization, better access to health care through a medical home, and participation may help reduce childhood obesity. It is now well-documented that WIC is effective in improving birth outcomes and the health of infants, including reducing low birth weight births below 2500g.<sup>xxx</sup> WIC is particularly effective at improving birth outcomes in moms with inadequate prenatal care and who are particularly high risk cases.<sup>xxxi</sup> One study found that WIC helps eliminate socioeconomic disparities in birth outcomes. WIC is a crucial program in providing food and education to support neurodevelopment.

One of the hallmarks of any successful nutrition and health care intervention is its evidence and science base. WIC participants may not purchase just any foods. The WIC food packages are based on what nutrition science experts recommend are needed to meet the nutritional needs of pregnant and breastfeeding women and young children. Recent research found that science-

based changes made to the food package in 2009 may have helped to reverse the rapid increase in obesity prevalence among WIC participants observed before the food package change.<sup>xxxiii</sup> Participants purchased and consumed less fruit juice, refined grains, grain-based desserts, and sugar-sweetened beverages while increasing purchases and consumption of fruits, vegetables, and whole grains. This dietary pattern has been associated with less weight gain in both children and adults. These findings underscore the importance of ensuring that the nutrition content of federal programs is determined by nutrition scientists and medical professionals.

WIC has played an important role in promoting breastfeeding but more progress can be made. The AAP recommends exclusive breastfeeding for about 6 months, followed by continued breastfeeding as complementary foods are introduced, with continuation of breastfeeding for 1 year or longer as mutually desired by mother and infant.<sup>xxxiv</sup> In addition to its nutritional benefits, breastfeeding protects against respiratory and gastrointestinal tract infections, ear infections, and may be linked to lower obesity rates in adolescence and adulthood. In order to support WIC participants to move closer to meeting AAP recommendations and national targets for breastfeeding, we recommend that the committee seek to find ways to promote breastfeeding in the WIC program including through an increase in the authorization for the successful breastfeeding peer counseling program within WIC to \$180 million.

Despite the demonstrated positive impact of WIC, many eligible families fail to take advantage of the program. While reasons for this vary from family to family, barriers that families face to enroll and remain enrolled in the program should be eliminated. One such barrier that families cite is the need to travel to a WIC clinic to enroll in the program or receive nutrition education. WIC clinics can reach more eligible families if they are in locations where potential participants already go for other services or that are part of their normal routine.<sup>xxxv</sup> This can be accomplished by permanently co-locating a WIC clinic in a community health center or a hospital much like we have at Children's National Health System.

One study from a Vermont pilot project found that children who received services from a co-located clinic were more likely to be continuously enrolled in WIC during their first year of life and that parents were significantly more likely to receive advice about early nutrition practices from both their pediatrician and a WIC nutritionist.<sup>xxxvii</sup> Further, pediatric clinic staff had more positive views of coordination of WIC services and services in their practice after participating in the program. As coordination with WIC is often a concern of pediatricians, this result is quite positive. Another study found that compared with other infants, those who used co-located WIC sites either were closer to their age-appropriate weight or had higher immunization rates when recertified by WIC after their first birthday.

Co-location of WIC clinics with pediatric practices is a best practice. Pediatricians report that when WIC clinics are co-located with their practices, there is better coordination with the WIC program. This is important for bidirectional communication as well as reducing potentially duplicative tests. With co-location, physicians and WIC staff are better able to collaborate and

coordinate care and have found that physically integrating services allows them to serve WIC participants more effectively.

The AAP strongly supports giving states the option to reduce administrative barriers for families of infants and helping them stay connected to WIC by extending the recertification period from 12 months to 24 months. We believe this would have a meaningful impact on ensuring children continue to access the benefits of WIC after their first birthday. Additionally, we support extending WIC eligibility to age 6 in order to cover children who are neither age-eligible for school - and therefore school meals - nor eligible for WIC. We also strongly support maintaining or strengthening WIC eligibility through pregnant women and children's eligibility for other programs for low-income families such as Medicaid and SNAP. Any linkage that reduces barriers to access for this critical program is a worthwhile investment for the health and well-being of children.

#### *Healthy School Foods*

Good nutrition is essential to health, and good health is essential to effective learning. The National School Lunch program provides nutritionally-balanced, low-cost or free lunches to about 30 million children each school day. Roughly 14 million children receive breakfast in their school. Given the double burden of food insecurity and obesity facing our children, it is essential that the meals children receive in school are nutritionally sound and based on the best available nutrition science. Children typically consume up to half of their daily calories in school, and for some children, the only food they eat each day comes from the federal school meal programs.

Updated school lunch standards required under the 2010 *Healthy, Hunger-Free Kids Act (HHFKA)* ensure that children have access to healthy school meals with more servings of fruits, vegetables and whole grains and foods lower in sodium. Recent studies have found that children are now eating more fruits and vegetables and discarding less of their lunch under the healthier standards<sup>xii</sup>. The U.S. Department of Agriculture, however, has recently made changes to the standards required under the HHFKA that could jeopardize this progress.

HHFKA provided for the first update to national standards for snack foods and beverages in schools since 1979. Through the updated Smart Snacks standards, we are setting up our children with the best possible chance at success by ensuring that they have healthy, nutritious food options. Ultimately, the HHFKA Smart Snacks standards improved children's nutrition and reduced intake of added sugars<sup>xiii</sup>.

With one in five children living in a household where food is scarce, and nearly one in three children and adolescents overweight or obese, we must redouble our efforts to replace unhealthy, nutrient-poor foods in schools with healthy, nutritious options. That is a commitment we can and should take on: to continue offering nutritious school foods for

children. Anything less would jeopardize the tremendous progress made to date and would be a step back for child nutrition.

At the same time, we need to redouble our efforts to ensure that eligible but unenrolled children are participating in the program and not dissuaded by paperwork requirements, fear, or stigma. Innovative programs like breakfast in the classroom help reduce stigma and improve academic performance but funding for the School Breakfast Program has not kept pace with the need.

The Community Eligibility Provision (CEP), created by the HHFKA, allows schools in low income communities to serve free breakfast and lunch to all students without requiring their families to complete individual applications, thereby reducing stigma and making participation in the school meals programs easier for families. Importantly, it has reached more than 9.7 million children in more than 20,700 schools in the 2016-2017 school year, over half of all eligible schools. CEP has been absolutely critical to lessening the administrative burden on schools, increasing participation, and facilitating implementation of alternative breakfast service models. We urge Congress to protect and preserve CEP and the progress it has made in reducing burdens on schools, families, and child food insecurity.

#### *Beyond the School Setting*

Children need optimal nutrition year-round. Countless children go without access to food during out of school or child care time including mornings, evenings, weekends and especially the summer months. Pediatricians can tell almost immediately which children had adequate nutrition during the summer and which children did not when conducting back-to-school physical exams. Existing summer feeding programs are not able to meet the needs of food insecure children. In fact, only one in seven children who ate a free or reduced-price school lunch during the 2016-2017 school year participated in Summer Nutrition Programs in July 2017. Summer breakfast reaches even fewer children, despite its critical importance. In July 2017, summer breakfast reached just over half of children participating in summer lunch.

USDA's summer EBT pilots have proven successful in reducing food insecurity and improving nutrition among participating children during the summer. Evaluations of the pilot found that these projects reduced very low food security among children by one-third, and also improved the quality of their diets, relative to those that did not have access to it. Access to the summer EBT program and Summer Nutrition Programs should be expanded to allow for greater participation in these programs.

As noted previously, nutrition in early childhood is an essential foundation for healthy child growth and development; thus ensuring that young children have healthy, nutritious food where they live, learn, and play is critically important. More than 3 million children are served

by the Child and Adult Care Food Program (CACFP), which provides cash assistance to states to provide healthful food to children and adults in child and adult care institutions. Congress has a vital role to play in ensuring adequate funding to support high quality nutrition through CACFP, adding the provision of additional food to meet the nutrition needs of children in care for longer hours, increasing participation of family child care providers, and reducing administrative burdens and costs to participating in the program.

#### ***Consumption of Added Sugars by Children and Adolescents***

Excess consumption of added sugars, especially from sugary drinks, contributes to the high prevalence of childhood and adolescent obesity, especially among children and adolescents who are socioeconomically vulnerable<sup>xliii</sup>. It also increases the risk for dental decay, cardiovascular disease, hypertension, dyslipidemia, insulin resistance, type 2 diabetes mellitus, fatty liver disease, and all-cause mortality. The 2015–2020 Dietary Guidelines for Americans recommend that added sugars contribute less than 10% of total calories consumed, yet U.S. children and adolescents report consuming 17% of their calories from added sugars, nearly half of which are from sugary drinks. Decreasing sugary drink consumption is of particular importance because sugary drinks are the leading source of added sugars in the U.S. diet, provide little to no nutritional value, are high in energy density, and do little to increase feelings of satiety. To protect child and adolescent health, federal nutrition assistance programs should aim to ensure access to healthful food and beverages and discourage consumption of sugary drinks.

#### ***Role of the Pediatrician***

The pediatrician's office serves an important setting for conversations about food and health. Pediatricians see children and their families for 31 well-child visits during the first 21 years of life. Twenty of these visits occur in the first five years of a child's life, providing an opportunity to partner with families to establish healthy living habits. Pediatricians can play a crucial role in screening and identifying children at risk for food insecurity and connecting families with needed community resources.<sup>xliiv</sup>

Good nutrition in pregnancy and childhood is a foundation for lifelong health. Just like we vaccinate to protect against illness, so too can we provide pregnant women and children with nutritional assistance and breastfeeding support to promote healthy development and protect against food insecurity and chronic disease. I urge the committee to put the nutritional needs of children first, from the prenatal months and onward. Our children's health simply cannot wait.

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**DOCUMENTS SUBMITTED FOR THE  
RECORD**

APRIL 10, 2019

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United States Department of Agriculture

Office of the Secretary  
Washington, D.C. 20250

JUN 20 2018

The Honorable Ron Johnson  
Chairman  
Committee on Homeland Security and Governmental Affairs  
United States Senate  
340 Dirksen Senate Office Building  
Washington, D.C. 20510

Dear Mr. Chairman:

The U.S. Department of Agriculture's (USDA) Office of Inspector General issued the results of its fiscal years 2016 and 2017 Improper Payments Review in accordance with the Improper Payments Elimination and Recovery Act of 2010 (IPERA) and concluded that five programs administered by the Food and Nutrition Service (FNS) were non-compliant for 7 or more consecutive years. The five programs include the National School Lunch Program; School Breakfast Program; Child and Adult Care Food Program; Special Supplemental Nutrition Program for Women, Infants, and Children; and the Supplemental Nutrition Assistance Program. Enclosed is FNS's plan to bring these five programs into compliance.

One of my highest priorities is to lower the improper payment rate for USDA programs and enhance IPERA compliance. Accordingly, I welcome the opportunity to provide an update on USDA's progress in reducing improper payments and, specifically, to discuss FNS's efforts to bring the five programs into full compliance with IPERA requirements. If you need further assistance, please have a member of your staff contact Kailee Tkacz in the Office of Congressional Relations at (202) 720-7095 or at [Kailee.tkacz@osec.usda.gov](mailto:Kailee.tkacz@osec.usda.gov).

A similar letter is being sent to Ranking Member Claire McCaskill.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen L. Censky", written over a horizontal line.

Stephen L. Censky  
Deputy Secretary

## **FNS Strategy to Address Improper Payments Elimination and Recovery Act Non-Compliances**

The Improper Payments Information Act of 2002 (IPIA) requires each Federal agency to annually review all programs and activities that it administers, identify those that are susceptible to significant improper payments, and submit to Congress an estimate of the annual amount of improper payments. Improper payments are defined by the Office of Management and Budget (OMB) as any payment that should not have been made or that was made in an incorrect amount. Improper payments also include payments made to ineligible recipients, payments for ineligible goods or services, or payments for goods and services not received. In addition, a payment is considered improper if it lacks sufficient documentation. The U.S. Department of Agriculture (USDA) reports improper payment information annually in its Agency Financial Report (AFR).

Each program and activity identified as susceptible to significant improper payments must produce a statistically valid estimate or utilize an alternative sampling and estimation approach that OMB approves. The estimates of the improper payment amounts for these programs and activities must be included in the accompanying materials to the agency's AFR. Each fiscal year, the Inspectors General are required to assess and provide a report of each agency's compliance with the requirements of the Improper Payments Elimination and Recovery Act of 2010 (IPERA).

In its fiscal years (FY) 2016 and 2017 Improper Payments Reviews reports, OIG found that FNS has been non-compliant with several requirements of IPERA for 7 or more consecutive years. The four noted areas of non-compliance (five total programs), along with FNS's strategy to address each one, are detailed below:

### **I. Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)**

**What is the non-compliance?** FNS failed to meet annual error reduction target rates for WIC for seven consecutive years. In FY 2014, FNS missed the target rate of 4.28 percent by 0.27 percent (actual: 4.55 percent); in FY 2015, the target rate of 4.18 percent was missed by 0.44 percent (actual: 4.62 percent); in FY 2016, the target rate of 4.08 percent was missed by 0.71 percent (actual: 4.79 percent), and in FY 2017, the target rate of 3.98 percent was missed by 1.01 percent (actual: 4.99 percent).

**Background and FNS Actions:** WIC's improper payments are primarily attributed to administrative or process errors made at the State or local level. FNS has taken a variety of proactive measures to reduce improper payments and improve program integrity. FNS's last two management evaluation (ME) cycles were targeted toward areas of State agency activities where improper payments are most likely to occur: vendor management (FYs 2013–2014) and certification and eligibility (FYs 2015–2016). As follow-up to the FY 2013–2016 MEs, FNS provided targeted, risk-based technical assistance to several WIC State agencies; provided numerous trainings/webinars on key topics; and developed several tools for State agency use, including a comprehensive WIC Vendor Management and Food Delivery Handbook.

**Actions Planned:** Additional resources are currently under development to assist in reducing administrative or process errors made at the State or local level, including a Certification and Eligibility Handbook. Additionally, FNS conducts bi-monthly conference calls with regional office staff on these topics in order to identify and resolve issues consistently nationwide. FNS will continue to collaborate with its State partners to address issues of integrity and improper payments in WIC.

**Expected Outcome:** Recent guidance from OMB indicates that error rates that fall within the estimation methodology confidence interval can be considered to be in compliance. As a result, WIC is expected to be in compliance. Therefore, we do not believe that additional statutory proposals are necessary to address these issues.

## **II. Child and Adult Care Food Program (CACFP)**

**What is the non-compliance?** FNS failed to publish a comprehensive error rate for CACFP for the seventh consecutive year. Specifically, FNS failed to publish an improper payment estimate for the Family Day Care Home (FDCH) Meals Claim component.

**Background and FNS Actions:** FNS has explored numerous strategies for obtaining an improper payment error rate for the FDCH meals claiming component. In part, the challenge arises from the CACFP administrative structure wherein reimbursements are provided for meals served to children in private homes and day care centers where accurate meal claiming can be a challenge. In 2014, FNS awarded a contract for the CACFP Family Day Care Homes Meals Claim Feasibility Study, which is intended to develop and test reliable methods to accurately estimate erroneous payments of meal claims in participating FDCHs. The study is testing the feasibility of two automated reporting systems for gathering information from parents and FDCH providers. The estimated completion date for the study is Summer 2018.

**Expected Outcome:** FNS believes proposing legislative changes to this aspect of the program to reduce improper payments in the absence of, at minimum, an initial error measurement would be premature. The current integrated, research-based approach is the best path for bringing CACFP into compliance with the provisions of IPERA.

## **III. National School Lunch Program (NSLP) and School Breakfast Program (SBP)**

**What is the non-compliance?** FNS has failed to report improper payment rates of less than 10 percent for the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) for seventh consecutive years.

**Background and FNS Actions:** For both NSLP and SBP, improper payment errors are broadly defined. FNS primarily attributes improper payments to two aspects of program operations: 1) administrative and applicant error in the certification process and 2) administrative error in the meal counting and claiming process. For example, much of the programs' certification process error is due to mistakes by households filling out free and reduced price meal applications. Household mistakes lead to improper overpayments or underpayments even when the local school district processes the applications without error. In the case of meal counting and

claiming process error, the entire federal reimbursement for any lunch or breakfast that fails to meet the programs' specific nutrition standards is recorded as an improper payment.

Over the last few years, FNS has worked with our partner State agencies and local school districts to move a greater portion of participating families from traditional paper applications (which are associated with relatively high error) to direct certification based on household participation in other Federal programs (e.g. Supplemental Nutrition Assistance Program). Studies have indicated that direct certification is associated with much lower error. Recognizing that millions of households and local school districts still rely on households' submission of free and reduced price meal applications, USDA recently released a web-based model application designed specifically to increase integrity by targeting common household mistakes. USDA released the application's open source program code to encourage re-use by local school districts and promote further innovation by school software firms. Since the release of USDA's model, several school software firms have modified their own applications to include some of the model application's integrity features, and at least one firm has adopted USDA's model application in its entirety. In March 2018, USDA issued a memorandum to reinforce the importance of integrity-focused application design generally and to encourage more widespread adoption of the specific integrity features in USDA's model application.

**Actions Planned:** FNS is also working to expand the number of State agencies that receive State Technology Grants from USDA. These grants assist states in implementing technology improvements and automation that reduces the risk of human error, particularly in recordkeeping and counting and claiming meals for federal reimbursement. For example, the Kansas Department of Education (KSDE) is proposing to add customer-driven solutions to their existing claim and information system that will replace paper monitoring tools and Excel spreadsheets. KSDE has identified four key technology improvements that will take place as a result of this grant. These should improve the overall monitoring process, enabling KSDE to determine program errors in real time. This will allow KSDE to better detect and prevent misuse of federal funds and improve integrity in the procurement process.

FNS and OMB have worked together to develop a proposal that would better measure payment accuracy by limiting the measure to eligibility determination errors and other errors that actually result in improper payments. The proposal would no longer include meal counting and claiming process errors, which are more accurately described as a standard of service error than improper payments. As an example, a school lunch or breakfast missing a required component (such as a vegetable) has historically been considered an overclaim, and the entire cost of the meal was counted as an "improper payment." In these cases, fixing the error would not reduce the level of USDA payments, as the solution would be to add the appropriate component to a child's plate.

**Expected Outcome:** We believe that this proposal, combined with FNS's comprehensive Corrective Action Plans detailed in USDA's AFR (summarized above) will make great progress in achieving compliance with the IPERA standard of an error rate less than 10 percent. With that, FNS believes proposing legislative changes to the program would be premature until a full assessment of the measurement proposal is implemented during the upcoming schools years.

#### **IV. Supplemental Nutrition Assistance Program (SNAP)**

**What is the non-compliance?** The Office of Inspector General's (OIG) Fiscal Year 2017 Compliance With Improper Payments (OIG Audit Report 50024-0013-11, released May 10, 2018) stated that FNS was non-compliant for SNAP for the third consecutive year. In 2015, SNAP missed its target error rate by 0.24 percent, and in 2016 and 2017, FNS did not publish a national error rate in the USDA's AFR.

**Background and FNS Actions:** Error rates for SNAP were not published in 2016 or 2017 because FNS and OIG determined that error rates reported by numerous State agencies included significant bias. FNS has worked with our State partners to address the reporting issues through corrective action, training, and revised guidance.

**Expected Outcome:** FNS intends to publish a SNAP error rate for FY 2017 by June 30, 2018, which will bring the Program into compliance with improper payment requirements. As a result, FNS believes proposing legislative changes to the program to reduce improper payments is unnecessary.

**Summary:** USDA's current strategies for addressing each of the FNS IPERA non-compliances are delivering progress. Continuing to move forward with our published corrective action plans is the best strategy for addressing improper payments with our State and local partners. Therefore, statutory changes are not recommended at this time.



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## **QUESTIONS AND ANSWERS**

APRIL 10, 2019

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**Senate Committee on Agriculture, Nutrition, & Forestry**  
Perspectives on Child Nutrition Reauthorization  
April 10, 2019  
Questions for the Record  
**Brandon Lipps**

**Chairman Pat Roberts**

1. I am pleased that the Department was able to secure the progress made by schools to serve more nutritious meals while returning some local flexibility for school meal planning. Please explain what has changed and what has not changed in the nutrition standards that were just finalized? Should schools or school districts be concerned about additional changes that would disrupt their food procurement and/or meal planning?

**Response:** The final rule published in December 2018 made permanent a series of menu planning flexibilities in the school meals programs. These practical updates to the meal patterns will empower schools to deliver healthful and appealing meals while reflecting local preferences. The final rule gives schools the flexibility to offer flavored, low-fat milk to children; provide half of the weekly grains in the school lunch and breakfast menus as whole grain-rich; and have more time to reduce sodium levels in school meals. No other meal pattern requirements for the NSLP and SBP have changed as a result of the final rule.

USDA will continue to listen to State agencies, school nutrition professionals, industry, and other stakeholders on a forward-thinking strategy that ensures school nutrition standards are both healthful and practical, while avoiding unnecessary burden and red tape. Nutrition program operators know their student customers and their communities best, and our goal is to ensure that they are equipped with the tools they need to meet program standards with reasonable flexibility and common sense. The Office of Management and Budget recently published its Spring 2019 Regulatory Agenda which includes the “*Simplifying Meal Service and Monitoring Requirements in the National School Lunch and School Breakfast Programs*” Proposed Rule.

2. We have heard that most states were reporting a very high percentage of schools in compliance with the school meal nutrition standards and meal planning requirements. Please explain why the flexibility that USDA provided, both in an interim final rule and then in a final rule that was completed and published in December 2018 were necessary. Please explain the waiver process that was previously being used.

**Response:** While many program operators have had success in implementing the updated nutrition standards in a way that encourages healthy eating and participation, some require additional flexibility and support from USDA to meet this goal. USDA continued to hear from program operators about persistent challenges with the milk, grains, and sodium requirements. The challenges identified by operators included declining milk consumption, difficulties preparing whole grain-rich food items, and limited ability to offer appealing meals with lower sodium content, and decreased student participation and/or meal consumption.

In response to appropriations language directives from Congress, , USDA granted exemptions from the whole-grain rich requirement in the National School Lunch and School Breakfast programs, beginning in school year 2014-2015. At a minimum, schools receiving an exemption from their State were required to ensure that at least half of all grains served were whole-grain rich, which allowed schools to expand their menu offerings of wholesome options like bagels, pasta, biscuits, and tortillas. States that chose to offer exemptions under this authority were required to notify USDA of their intent to offer exemptions, establish a process for evaluating and responding to exemption requests from schools, and submit their exemption process to USDA prior to implementation. The statutory authority for this exemption process was extended in subsequent school years through additional appropriations language, and in school year 2017-2018, was expanded to include exemptions allowing schools to offer low-fat, flavored milk. Although this exemption process provided beneficial flexibility to States and schools to help them create tasty meals that students will enjoy, some States found the exemption process to be burdensome.

The final rule published in December 2018 ensures that States and schools can continue to take advantage of these vital menu planning flexibilities without the hassle of additional paperwork or red tape.

3. The Government Accountability Office (GAO) testimony indicated that of the 14 GAO recommendations regarding USDA’s administration of child nutrition programs, USDA has addressed nine, taken steps to address one, and is planning to address the remaining four. Please elaborate on the status of each of those recommendations individually.

**Response:** Please see below for a breakdown of the 14 GAO recommendations, listed from oldest to newest:

	<b>Audit Name</b>	<b>Recommendation</b>	<b>Actions Taken Or In Progress</b>	<b>Status</b>
1	GAO-13-290 (Publicly Released March 8, 2013) <i>WIC Program: Improved Oversight of Income Eligibility Determination Needed</i>	Rec. 1: To improve WIC oversight and administration, the Secretary of Agriculture should direct FNS to develop a timeline for reviewing Management Evaluation reports to assess program risks at a national level and target assistance to states.	In 2013, FNS staff developed a process to use an automated report to identify areas in need of correction or improvement that were found during WIC Management Evaluations conducted across the country. Using the output report, FNS agreed to assess the frequency of Management Evaluation findings in each policy and program area nationwide and respond by providing policy clarification, training, or other corrective actions to states. The report went into	Closed and Implemented

	Audit Name	Recommendation	Actions Taken Or In Progress	Status
2	<p>GAO-14-104 (Publicly Released February 27, 2014) <i>School Lunch: Implementing Nutrition Changes Was Challenging and Clarification of Oversight Requirements Is Needed</i></p>	<p>Rec. 1: To improve program integrity, as USDA moves forward with its new administrative review process, the Secretary of Agriculture should direct the Administrator for the Food and Nutrition Service to clarify to states the importance of documenting compliance issues found during administrative reviews and requiring corrective actions to address them.</p>	<p>production on November 1, 2013, and FNS staff review the reports quarterly.</p> <p>FNS officials agreed that the new administrative review process would improve program integrity. USDA issued a memo dated July 11, 2014, to all regional and state directors reiterating the importance of documenting review findings, and any resulting technical assistance and corrective action during administrative reviews.</p>	<p>Closed and Implemented</p>
3	<p>GAO-14-104 (Publicly Released 2 February 27, 2014) <i>School Lunch: Implementing Nutrition Changes Was Challenging and Clarification of Oversight Requirements Is Needed</i></p>	<p>Rec. 2: To improve program integrity, as USDA moves forward with its new administrative review process, the Secretary of Agriculture should direct the Administrator for the Food and Nutrition Service to continue efforts to systematically assess all states' needs for information to improve their ability to oversee SFA financial management and provide assistance to meet identified needs.</p>	<p>FNS made multiple efforts to address this recommendation. Specifically, as of July 2014, FNS completed its initial efforts to systematically assess all states' needs for information to improve their ability to oversee SFA financial management. In addition, FNS held a breakout session to discuss financial management issues at the USDA/State Agency Meeting in November 2015 and held three national financial management procurement training sessions in 2015. Further, in August 2016, FNS convened a webinar for states to discuss the inclusion of resource management in the administrative review process, as well as related challenges, opportunities, and best practices for implementation.</p>	<p>Closed and Implemented</p>

	<b>Audit Name</b>	<b>Recommendation</b>	<b>Actions Taken Or In Progress</b>	<b>Status</b>
4	GAO-14-262 (Publicly Released June 16, 2014) <i>School-Meals Programs: USDA Has Enhanced Controls, but Additional Verification Could Help Ensure Legitimate Program Access</i>	Rec. 1: To improve integrity and oversight of the school-meals programs, the Secretary of Agriculture should evaluate the data collected on for-cause verifications for the 2013-2014 school year to determine if for-cause verification outcomes should be reported separately, and if appropriate, develop and disseminate additional guidance for conducting for-cause verification that includes criteria for identifying possible indicators of questionable or ineligible applications.	In March 2017, FNS informed GAO that evaluation of the verification for cause data collected revealed that few local educational agencies (LEAs) reported any verification conducted for cause and some of the data reported was significantly flawed. The FNS analysis did not indicate that any benefit in integrity and oversight would be gained by requiring the reporting of verification for cause outcomes separately. Therefore, the additional burden to collect this optional information would not be justifiable. However, FNS supports the use of verification for cause and in August 2014, disseminated additional guidance for conducting for-cause verification that included criteria for identifying possible indicators of questionable or ineligible applications. By issuing this additional guidance, FNS took an important step towards ensuring that school districts identify applications that should be subject to for-cause verification, and help improve integrity and oversight of the school-meals programs.	Closed and Implemented
5	GAO-14-262 (Publicly Released June 16, 2014) <i>School-Meals Programs: USDA Has Enhanced Controls, but Additional</i>	Rec. 2: To improve integrity and oversight of the school-meals programs, the Secretary of Agriculture should develop and assess a pilot program to explore the feasibility of computer	In March 2017, FNS informed GAO that it updated its guidance in July 2015 to clarify to LEAs the procedures for confirming and verifying the application's status as categorically eligible. This	Closed and Implemented

Audit Name	Recommendation	Actions Taken Or In Progress	Status
<p><i>Verification Could Help Ensure Legitimate Program Access</i></p>	<p>matching school meal participants with other sources of household income, such as state income databases, to identify potentially ineligible households--those with income exceeding program-eligibility thresholds--for verification.</p>	<p>guidance specified that LEAs should contact households with case numbers on the applications that do not have a direct certification match for further clarification or verify the application for cause. According to FNS documentation, direct certification occurs through a data exchange that may use automated data matching or an exchange of e-mails or faxes with appropriate agency officials. While the sample selection methodology used to verify applications to confirm eligibility is statutorily defined, the FNS July 2015 guidance required a percentage of approved applications that list a case number to be selected as part of an alternate verification sample available to qualified LEAs. In addition, FNS informed GAO that it has provided technical assistance and support of the legislative reauthorization bills that includes redefining the standard sample to include applications that indicate categorical eligibility. By updating its guidance to LEAs regarding verification of eligibility and providing technical assistance and support for further expansion of the verification process, FNS made efforts to enhance the current verification process and strengthen program integrity.</p>	

	<b>Audit Name</b>	<b>Recommendation</b>	<b>Actions Taken Or In Progress</b>	<b>Status</b>
6	GAO-14-262 (Publicly Released June 16, 2014) <i>School-Meals Programs: USDA Has Enhanced Controls, but Additional Verification Could Help Ensure Legitimate Program Access</i>	Rec. 3: To improve integrity and oversight of the school-meals programs, if the pilot program shows promise in identifying ineligible households, the Secretary of Agriculture should develop a legislative proposal to expand the statutorily-defined verification process to include this independent electronic verification for a sample of all school-meals applications.	In March 2017, FNS informed GAO that it commissioned an analysis to determine if matching National School Lunch Program (NSLP) participants to income databases was feasible. The analysis found that this was not feasible because NSLP participants were not required to provide full Social Security Numbers. However, FNS also informed GAO that it has provided technical assistance and support of the legislative reauthorization bills that include further expansion of the verification process. By exploring the feasibility of using computer matching to identify potentially ineligible households for verification and providing technical assistance and support for further expansion of the verification process, USDA made efforts to enhance the current verification process and strengthen program integrity.	Closed and Implemented
7	GAO-14-262 (Publicly Released June 16, 2014) <i>School-Meals Programs: USDA Has Enhanced Controls, but Additional Verification Could Help Ensure Legitimate Program Access</i>	Rec. 4: To improve integrity and oversight of the school-meals programs, the Secretary of Agriculture should explore the feasibility of verifying the eligibility of a sample of applications that indicate categorical eligibility for program benefits and are thus not subject to standard verification.	In March 2017, USDA informed GAO that it updated its guidance in July 2015 to clarify to LEAs the procedures for confirming and verifying the application's status as categorically eligible. This guidance specifies that LEAs should contact households with case numbers on the applications that do not have a direct certification match for further clarification or verify the application for cause.	Closed and Implemented

	Audit Name	Recommendation	Actions Taken Or In Progress	Status
			<p>According to FNS documentation, direct certification occurs through a data exchange that may use automated data matching or an exchange of e-mails or faxes with appropriate agency officials. While the sample selection methodology used to verify applications to confirm eligibility is statutorily defined, the FNS July 2015 guidance required a percentage of approved applications that list a case number to be selected as part of an alternate verification sample available to qualified LEAs. In addition, FNS told GAO that it has provided technical assistance and support of the legislative reauthorization bills that includes redefining the standard sample to include applications that indicate categorical eligibility. By updating its guidance to LEAs regarding verification of eligibility and providing technical assistance and support for further expansion of the verification process, FNS made efforts to enhance the current verification process and strengthen program integrity.</p>	
8	<p>GAO-15-94 (Publicly Released January 12, 2015) <i>Nutrition Assistance: Additional Guidance Could Assist States in Reducing Risk of Online Sale of Infant Formula</i></p>	<p>Rec. 1: To better ensure that WIC participants are aware of the prohibition against selling WIC formula, and to assist states' efforts to prevent and address online formula sales, the Secretary of Agriculture should direct the</p>	<p>In March 2016, FNS issued final regulations, effective May 2016, that require state agencies to include the prohibition against the sale of food benefits from the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) in</p>	<p>Closed and Implemented</p>



	<b>Audit Name</b>	<b>Recommendation</b>	<b>Actions Taken Or In Progress</b>	<b>Status</b>
		Administrator of FNS to instruct state agencies to include in the rights and responsibilities statement that participants are not allowed to sell WIC food benefits, including online.	participant rights and responsibilities statements.	
9	GAO-15-94 (Publicly Released January 12, 2015) <i>Nutrition Assistance: Additional Guidance Could Assist States in Reducing Risk of Online Sale of Infant Formula</i>	Rec. 2: To better ensure that WIC participants are aware of the prohibition against selling WIC formula, and to assist states' efforts to prevent and address online formula sales, the Secretary of Agriculture should direct the Administrator of FNS to require state agencies to articulate their procedures for identifying attempted sales of WIC food benefits in their WIC state plans and analyze the information to ascertain the national extent of state efforts.	FNS agreed with this recommendation and in April 2015 the agency revised the guidance for WIC state plans to include policies on informing participants that the sale of WIC benefits is a program violation. As part of that document, state agencies were required to articulate their policies and procedures for identifying and monitoring online sales of WIC benefits. In addition, in July 2018, a FNS contractor completed a study that analyzed state efforts. Specifically, the study 1) described WIC state agency policies and practices intended to prevent, monitor, investigate, and take administrative action related to online sales of WIC infant formula; and 2) identified the most common preventative, monitoring, and investigative approaches to address the online sale of WIC infant formula.	Closed and Implemented
10	GAO-15-94 (Publicly Released January 12, 2015) <i>Nutrition Assistance: Additional Guidance Could Assist States in Reducing Risk of Online Sale of Infant Formula</i>	Rec. 3: To better ensure that WIC participants are aware of the prohibition against selling WIC formula, and to assist states' efforts to prevent and address online formula sales, the Secretary of Agriculture should direct the Administrator of FNS to	FNS agreed with this recommendation and informed GAO that it would explore options for using available resources to assess the extent of online sales of WIC formula and to identify and share best practices, cost-effective techniques, or new approaches with state agencies to use in	Open and In Progress

	Audit Name	Recommendation	Actions Taken Or In Progress	Status
		<p>collect information to help assess the national extent of attempted online sales of WIC formula benefits and determine cost-effective techniques states can use to monitor online classified advertisements.</p>	<p>monitoring online advertisements. In July 2018, a FNS contractor completed a study intended to provide information to assess the prevalence of online sales of WIC formula and identify cost-effective techniques states can use to monitor and prevent them. However, FNS will not be releasing the study to states, in part because it included information that was investigative in nature. In April 2019, FNS informed GAO that the agency is currently developing guidance on best practices and cost-effective techniques identified in the report to disseminate to WIC state agencies later in 2019. GAO agreed that informing states of cost-effective techniques for monitoring and preventing online WIC formula sales would address the recommendation.</p>	
11	<p>GAO-18-369 (Publicly Released May 31, 2018) <i>Summer Meals: Actions Needed to Improve Participation Estimates and Address Program Challenges</i></p>	<p>Rec. 1: The Administrator of the Food and Nutrition Service (FNS) should improve its estimate of children's participation in the SFSP by focusing on addressing, at a minimum, data reliability issues caused by variations in the number of operating days of meal sites and in the months in which states see the greatest number of meals served.</p>	<p>FNS plans to conduct additional research on the variation in operating days at the SFSP sponsor level and examine the frequency in which sponsors are only open for a few days and the impact this has on the average daily attendance (ADA) state level estimates. This effort will also examine trends in the number of meals served throughout the summer to gain additional insight into patterns of peak service times across the States as well as provide information on data collected at the State level</p>	<p>Open and In Progress</p>

	Audit Name	Recommendation	Actions Taken Or In Progress	Status
			that is not reported to FNS due to reporting requirement constraints. FNS currently anticipates that it will complete an evaluation of how we calculate SFSP participation by summer 2020.	
12	GAO-18-369 (Publicly Released May 31, 2018) <i>Summer Meals: Actions Needed to Improve Participation Estimates and Address Program Challenges</i>	Rec. 2: The Administrator of FNS should communicate to all SFSP stakeholders the circumstances it considers in approving requests for flexibility with respect to the requirement that children consume SFSP meals on-site in areas that have experienced crime and violence, taking into account the feasibility of accessing data needed for approval, to ensure safe delivery of meals to children.	FNS recognizes that due to the uniqueness of how and when SFSP sites operate, flexibility regarding the congregate feeding requirement may be warranted under extreme circumstances. In support of this, to date FNS has 1) issued a memo in 2018 that outlines the procedures sponsors and States must follow to request participation in a demonstration project, and 2) On May 31, 2018, conducted a webinar on the topic of the demonstration project and waiver request requirements.	Open and In Progress
13	GAO-18-369 (Publicly Released May 31, 2018) <i>Summer Meals: Actions Needed to Improve Participation Estimates and Address Program Challenges</i>	Rec. 3: The Administrator of FNS should evaluate and annually report to Congress, as required by statute, on its use of waivers and demonstration projects to grant states and sponsors flexibility with respect to the requirement that children consume SFSP meals on-site in areas experiencing crime or violence, to improve its understanding of the use and impact of granting these flexibilities on meeting program goals.	FNS has submitted the annual report to Congress to meet its statutory requirement summarizing the use of waivers and demonstration projects. The <i>Status of Demonstration Projects Authorized Through the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act</i> was submitted to Congress on April 24, 2019. The <i>Report on the Waivers Received by the Child Nutrition Programs</i> was submitted to Congress on April 25, 2019.	Open and In Progress

	Audit Name	Recommendation	Actions Taken Or In Progress	Status
14	GAO-18-369 (Publicly Released May 31, 2018) <i>Summer Meals: Actions Needed to Improve Participation Estimates and Address Program Challenges</i>	Rec. 4: The Administrator of FNS should disseminate information about existing flexibilities available to state agencies to streamline administrative requirements for sponsors participating in the SFSP and other child nutrition programs to help lessen the administrative burden. For example, FNS could re-distribute existing guidance to state agencies that explains available flexibilities and encourage information sharing.	In support of this recommendation, in October 2018 FNS issued revised guidance on streamlining administrative requirements for sponsors participating in the SFSP. A webinar was also conducted in October 2018 and streamlining options were presented to State agencies in December 2018. Additionally, FNS is considering rulemaking to address streamlining flexibilities that impact the SFSP on an upcoming regulatory agenda.	Open and In Progress

**4. Please detail the Department's goals for improving the integrity of States' administration of the school meal programs through training and technical assistance. Are there areas of intergovernmental coordination that could be improved? If so, please elaborate.**

**Response:** Training and technical assistance that States provide to school food authorities (SFAs) is critical to promoting program integrity in school meal programs. USDA is focused on having an open dialogue with State agencies to address their training and technical assistance needs so that State agencies can provide local operators with the tools they need to run the Programs successfully.

Last year, USDA convened a work group with States to help assess and address challenges States face in oversight of the school meal programs. The work group also sought to identify potential flexibilities and policy changes that would allow States to meet oversight and program integrity outcomes while minimizing burden and unnecessary effort. At this time, USDA is actively considering this feedback. In addition, we have strongly encouraged States to coordinate internally when they have multiple state agencies administering the Child Nutrition Programs and encouraged them to identify opportunities to streamline the review and participation requirements in all Child Nutrition Programs.

The Department's efforts also extend to the development of research-backed tools and products that recognize the States and SFAs as our partners in the effort to improve program performance.

I've previously mentioned USDA's development of a model online school meal application. Our goal with that model is to push the market for online applications in a new integrity-focused direction without imposing a mandate on program administrators. It is a workable model, rather than an abstract set of standards, that puts SFAs and States in a stronger position to demand

better application design from their software vendors. We are pleased that this model has been adopted and is in use among a growing number of SFAs.

Over the past year, USDA has been developing an administrative data validation service to improve the integrity of school meal verification data. This is the data generated by the annual process to select a sample of approved applications and contact the applicants for supporting documentation. The service is designed to work with the systems that States have already developed to collect and report verification data to USDA. The agency is working closely with two volunteer state agencies and the General Service Administration to build the service to improve customer service. This is a good example of federal inter-agency cooperation to strengthen the shared integrity goals of USDA and our State program partners.

- 5. Please outline the benefits or challenges with developing a single-application and administrative review process for sponsors with a high compliance history who simultaneously operate multiple school-based meal or snack programs, such as the National School Breakfast Program, National School Lunch Program, and after-school snack program under the Child and Adult Care Food Program, and/or the Summer Food Service Program.**

**Response:** USDA is working to streamline burden for organizations that operate more than one Child Nutrition Program. The Richard B. Russell National School Lunch Act authorizes permanent agreements to streamline participation. To further encourage organizations to offer meal services year-round in the communities they serve, USDA has published guidance to reduce paperwork and redundancies. USDA has supported additional simplification efforts to eliminate duplication in application requirements, site eligibility, health and safety inspections, training, and financial management, to ease an organization's transition between programs.

Some program administrative challenges require State action. USDA strongly encourages States to coordinate internally when they administer multiple Child Nutrition Programs, and identify opportunities to streamline reviews and participation wherever possible. We also encourage States to consider flexibilities available for school food authorities to align administrative activities in the Child Nutrition Programs. Furthermore, participating organizations in good standing in CACFP and the school meal programs can be exempted from providing further evidence of financial and administrative capability when applying for SFSP participation. This serves to streamline and reduce burden in their application process.

While the Child Nutrition Programs are designed to serve similar populations, there are in many instances, differing statutory requirements in key areas, including duration and timing of the programs, eligibility determinations, types and number of reimbursable meals, availability of administrative payments, and established rates of reimbursement. USDA is pleased to provide further technical assistance on future streamlining measures.

- 6. Are there nutrition requirements that can be streamlined that would maintain nutrition standards but provide consistency for schools or sponsors serving foods across the National School Breakfast Program, National School Lunch Program, and after-school snack program under the Child and Adult Care Food Program, and/or the Summer Food Service Program?**

**Responses:** USDA is committed to identifying ways to reduce burden for operators of multiple Child Nutrition Programs, while balancing the diverse needs of the children served by those Programs. Although the school meal programs, Child and Adult Care Food Program, and Summer Food Service Program share some commonalities in their nutrition requirements, each program is uniquely designed to meet the dietary needs of children who may range in development from infancy through late adolescence. USDA also considers the diverse settings in which each program operates when setting standards; for example a requirement that may be reasonable in a school setting may require a different approach in a family day care home. Whenever possible, States and institutions are provided the flexibility to tailor their programs to meet local needs. For example, schools serving summer meals are allowed the flexibility of following the NSLP or SBP meal pattern requirements or the SFSP meal patterns. USDA will remain open to stakeholders' suggestions for program improvement, and is working to identify additional streamlining measures that are practical, contribute to program efficiency, and allow program operators to continue offering meals that safeguard children's health and support developmental and academic growth.

7. Please outline the status of and process for revisions to the eligible food package under the Special Supplemental Nutrition Program for Women, Infants and Children (WIC).

**Response:** The WIC food packages are scientifically based and provide supplemental foods designed to meet the nutritional needs of low-income pregnant, breastfeeding, non-breastfeeding postpartum women, infants and children up to five years of age who are at nutritional risk. Section 17(f)(11) of the Child Nutrition Act of 1966, as amended, requires a comprehensive, scientific review of the WIC food packages at least every 10 years.

In August 2014, the Food and Nutrition Service (FNS) contracted with the Institute of Medicine (IOM) (now known as the National Academy of Sciences, Engineering, and Medicine (NASEM)) to conduct an independent, comprehensive scientific review of WIC food packages, and recommend cost-neutral changes in line with the nutritional status and food and nutrition needs of the WIC-eligible population.

Recommendations were to be consistent with the 2015 Dietary Guidelines for Americans (DGA) as well as other relevant expert publications, such as American Academy of Pediatrics reports and policy statements, Dietary Reference Intakes, and other NASEM reports on obesity, food security, & nutrition during pregnancy. Recommendations were to also update and expand upon the 2005 IOM report *WIC Food Packages: Time for a Change* and take into account the cultural needs of the WIC participant population, support efficient program operations and allow effective administration across the geographic scope of the program. On January 5, 2017, the NASEM released its report, *Review of WIC Food Packages: Improving Balance and Choice* that made recommendations for the WIC food packages.

The Agricultural Act of 2014, also known as the 2014 Farm Bill, officially called for the DGA to expand to include infants and toddlers (from birth to age 2 years), as well as women who are pregnant, beginning with the 2020 edition. In connection to that, the Agency worked with the Department of Health and Human Services to conduct a number of systematic reviews on diet and health for infants, toddlers, and women who are pregnant. These reviews are highly relevant

to WIC's population and the food packages, and it will be necessary for WIC food packages to align with the Federal nutrition guidance in the 2020 DGA. USDA will use the updated scientific information from the NASEM report and this effort to inform its next course of action. The regulatory process will be used, as appropriate, for any changes to the WIC food packages offered through the program.

8. With regard to the WIC electronic benefit transfer (EBT) that is required to be implemented by October 1, 2020, please outline the timeline and completion estimate for each WIC State agency to fulfill the requirement.

**Response:** The Department continues to promote the implementation of WIC EBT through technical assistance to WIC State agencies and provides funding to support the planning and implementation of WIC EBT systems. Currently, all 90 State agencies are involved in some phase of EBT planning, implementation, or have achieved statewide EBT.

As of April 2019, 48 State agencies (including Indian Tribal Organizations (ITOs)) have achieved EBT statewide; four State agencies have projects with plans for statewide EBT in FY 2019; 16 State agencies have projects with plans for statewide EBT in FY 2020 and 22 State agencies have projects requiring targeted technical assistance from FNS to facilitate their achievement of statewide EBT.

FNS is providing targeted technical assistance to the District of Columbia and New Jersey due to procurement challenges, which have resulted in delays in establishing projected statewide EBT implementation dates. Puerto Rico's projected date has been delayed due to procurement challenges, and attention has been focused on recovery efforts from the 2017 hurricanes.

19 ITOs do not have statewide EBT implementation dates yet but these ITOs continue to plan for work in support of meeting the EBT statutory deadline. USDA stands ready to provide technical assistance to these ITOs as needed.

To obtain the current EBT status of each WIC State agency, please refer to the WIC EBT Detail Status Report via the following link: <https://www.fns.usda.gov/wic/wic-ebt-activities>. FNS updates this report monthly.

9. Please elaborate on other technology innovations that USDA is exploring that could provide efficiencies within the WIC program?

**Response:** The Department continues to look for technology innovations to achieve program efficiencies within the WIC program. Work is being done in all areas of the program to increase the use of technology in order to improve program operations and FNS' oversight capacity. Some key projects and initiatives are outlined below.

- Electronic Benefit Transfer (EBT): The Department continues to promote the implementation of WIC EBT by October 1, 2020. EBT provides WIC State agencies with more accurate and timely data that they can use to better monitor and contain food costs.

- **Resource Development:** FNS has developed and deployed numerous resources intended to streamline processes to improve compliance with key requirements and increase State agency capacity to complete complex analyses. Examples include:
  - Excel worksheets that allow State agencies with limited in-house technological and analytical resources to easily analyze and update their methodologies for determining maximum allowable reimbursement levels and competitive price selection criteria, and to assess above-50-percent vendors for cost neutrality.
  - A toolkit on WIC vendor peer group assessment that includes Excel and SAS-based analytical tools that can be used by State agencies to complete their required assessment from start to finish.
  - Trainings on how to use spatial analyses to conduct participant access determinations.
- **Special Projects and Initiatives:** The Department continues to explore opportunities that support WIC State agencies in the use of technology to simplify the client application and WIC participant experience. These include:
  - WIC Special Project Grants, which provide an opportunity for State agencies to test innovative technology, including: offering online nutrition education classes, and creating a web-based appointment scheduler that acts as an interactive customer service representative. FNS will disseminate lessons learned to all WIC state agencies.
  - Telehealth grants to supplement the nutrition education and breastfeeding support offered in the WIC clinic. These grants will likely reduce barriers to accessing important WIC services for populations who experience difficulties getting to a WIC clinic.
- **Research:** FNS has contracted several studies to assess the need for and viability of using technology to improve the WIC Program. For example:
  - WIC EBT Issuance and Transaction Study: This project will explore the feasibility of compiling National WIC EBT issuance and transaction data; linking it to participant, vendor, and program characteristics data; and generating public and restricted use data sets and analytical reports.
  - The Participant Research Innovation Laboratory for Enhancing WIC Services: through this cooperative agreement, Johns Hopkins University will support and evaluate local efforts to develop interactive tools, technical resources, and innovative solutions that improve customer service in WIC clinics.

**Senator Debbie Stabenow**

1. I appreciated your comments during the hearing on the importance and effectiveness of Summer EBT programs. You also mentioned that there are new things USDA is hoping to learn by implementing Summer EBT projects this year, including the effects of new methodologies over longer periods of time. Can you elaborate on how prioritizing projects led by State agencies that have not previously received funding will provide this data in a



way that multi-year projects in currently participating states cannot? Has USDA done any analysis on the impact on food insecurity if EBT is no longer available to children in areas currently participating in Summer EBT?

**Response:** In 2010, Congress provided USDA the authority to carry out demonstration projects to develop and test methods of providing access to food for children in urban and rural areas during the summer months when schools are not in regular session (section 749(g) of P.L. 111-80). Since 2011, USDA has implemented the Summer Electronic Benefit Transfer for Children demonstration project in 12 States. USDA learned valuable operational lessons from States that participated previously and is interested in working with new States to test additional methods for administering EBT benefits to low-income children in the summer and to study the effectiveness of these new methodologies over an extended period. This multi-year approach will allow participating States more time to build and refine their projects, and provide the certainty needed to make investments that will be used across several years.

Working with new States will also allow USDA to gain a fresh perspective into approaches to building and implementing a Summer EBT demonstration project efficiently, effectively, and with integrity. Although highest priority for a FY 2019 award is being given to new States, the FY 2019 Request for Applications was open to all States regardless of prior experience operating a Summer EBT demonstration. USDA has not done an analysis of the impact on food insecurity if Summer EBT is not available to children in communities that participated in prior years. Permanently authorized summer meal programs, including the Summer Food Service Program and the Seamless Summer Option of the NSLP, remain available in all States, and FNS is committed to working with States and other partners to support service to low-income children through these programs.

2. Farm to School programs have become an incredibly popular part of school meals and school learning. Does USDA have enough resources to meet the demand for grants? Are there changes to the current grant program that might help maximize the impact of these efforts?

**Response:** Since FY 2013, USDA has awarded over \$30 million through the Farm to School Grant Program, funding 437 projects across the 50 States, District of Columbia, Virgin Islands, Guam and Puerto Rico, reaching almost 16 million students in 35,000 schools. Each year, the award process has been highly competitive, with roughly 20-30 percent of applicants receiving awards. In response to the most recent Request for Applications, USDA received 230 applications requesting a total of \$17 million for FY 2019. The additional grant funding provided by Congress in the 2018 and 2019 appropriations will allow USDA to fund a greater share of Farm to School Grant requests.

The President's FY 2020 Budget includes a proposal to permanently change the maximum amount a Farm to School grant recipient may receive from \$100,000 to \$500,000. Raising the grant cap would allow States to integrate Farm to School activities into their structures as well as increase their reach, scope, and impact, and would enable grantees to conduct higher impact work that is more likely to last beyond the end of the grant term. Raising the cap would also allow USDA to streamline grants programming and provide better customer service to each grantee. We are happy to work with Congress as you consider this and any other budget request.

3. You mentioned the use of technology as a way to simplify the client application and participation experience in the WIC program. Could you provide additional information on how additional ways technology may be beneficial to achieving these goals?

**Response:** FNS supports technology and innovation in WIC, and is committed to identifying ways to modernize program operations. The Department continues to explore opportunities that support WIC State agencies in the use of technology to simplify the client application and WIC participant experience.

The Department continues to promote the implementation of WIC electronic benefit transfer (EBT) by October 1, 2020. FNS provides technical assistance to WIC State agencies and funding to support the planning and implementation of WIC EBT systems. EBT streamlines the participant shopping experience, reduces stigma, and allows food purchases as needed, rather than being limited to a few bulk purchases each month. In FY 2018, FNS also awarded a contract to assess the effectiveness, and catalog the features, of WIC “shopper apps” available in the online marketplace. WIC shopper apps are one technology that has been shown to improve and simplify the participant’s shopping experience.

FNS has also recently updated the WIC Prescreening Tool, a web-based application that helps potential WIC applicants determine if they are likely to be eligible for WIC benefits, provides information on how to schedule a certification appointment and examples of the documentation required at the initial certification appointment.

With the goal of improving retention of eligible children in the WIC Program, FNS awarded a \$2-million cooperative agreement to the Johns Hopkins University (JHU) in 2018 to establish the *Participant Research Innovation Laboratory for Enhancing WIC Services*. Through this cooperative agreement, JHU will support and evaluate local efforts to develop interactive tools, technical resources, and innovative solutions that improve customer service in WIC clinics.

Finally, FNS appreciates that Congress recently appropriated \$5 million for competitive telehealth grants to supplement the nutrition education and breastfeeding support offered in the WIC clinic. These grants will look at ways to reduce barriers in accessing important WIC services for populations who experience difficulties getting to a WIC clinic.

4. USDA recently rescinded several policies allowing waivers of certain Summer Food Service Program requirements. Does USDA anticipate any declines in sites or families participating in SFSP or any additional challenges in program operations? Has USDA seen any increases in waiver requests from State agencies or sponsors since these rescissions?

**Response:** USDA is committed to maintaining access to summer meals for children in need and making sure that State agencies are prepared to implement the SFSP with integrity. The rescinded nationwide waivers should have little impact on the availability of summer meals, as the majority of the waivers focused on administrative practices meant to simplify program operations. In addition, USDA is working closely with State agencies to ensure that States have the flexibility through individual State waiver requests to meet the needs of their communities

and limit the impact on access. USDA provided technical assistance to State agencies to help determine the impacts of the rescinded nationwide waivers and whether an individual waiver would benefit their State. This technical assistance included a webinar, Questions and Answers document, and other resources.

USDA has seen a significant increase in the number of waivers received from State agencies and eligible service providers since the rescission of the nationwide waivers. As of April 18, 2019, FNS has received over 200 waiver requests from individual States and sponsors, and is working expeditiously to review and respond. As of April 18, 2019, USDA has already responded to 165 submitted waivers.

5. Meal time for students is an issue that continues to be raised by food service directors and public health professionals. What, if any, work has been done between USDA and the Department of Education to address this issue?

**Response:** USDA understands that providing enough time to eat is an important factor in ensuring our nation's schoolchildren have a healthy school environment. Adequate meal times are critical both to ensure that children have enough time to consume a variety of foods as part of a healthy meal, and to reduce food waste. Though USDA sets the standards for the operation of school meal programs, we do not have the authority require a minimum time for lunch service periods. The Richard B. Russell National School Lunch Act, section 12(c), prohibits USDA from imposing any requirement in relation to curriculum and methods of instruction. While this requirement addresses the educational components, USDA has long honored the intent that the authority to manage the school day, including times dedicated to lunch service, is inherently that of the state and local education agencies. We know that many of these agencies are working to alleviate these problems, and we encourage their efforts to develop practical methods that provide children enough time to consume their lunches. We would be happy to work with the committee to explore ways USDA and the Department of Education can further support adequate meal times.

6. Does USDA anticipate publication of any additional rulemaking that would affect eligibility or meal standards within Child Nutrition Programs during Fiscal Year 2019?

**Response:** FNS is committed to providing State agencies and program operators with the resources and flexibility they need to operate the Federal nutrition assistance programs effectively and efficiently. We have put in place a number of flexibilities that are helping schools provide children with wholesome and appealing foods, while reducing the burden on program operators. We continue to listen to State agencies, school nutrition professionals, industry, and other stakeholders on a forward-thinking strategy that ensures school nutrition standards are both healthful and practical, while avoiding unnecessary burden and red tape. We believe this input will be invaluable and are happy to work with Congress to address these issues. Notice of any future rulemaking is made publicly available once the Office of Management and Budget publishes the latest Agenda of Regulatory and Deregulatory Actions. The recently announced 2019 Spring Regulatory Agenda includes the "*Simplifying Meal Service and Monitoring Requirements in the National School Lunch and School Breakfast Programs*" Proposed Rule.

Senator John Hoeven

1. In your written testimony, you state that great customer service starts with listening to customers of the programs you administer so that you are able to better serve their needs.
  - a. In listening to school nutrition professionals, what have they told you they need to ensure that school meals are both nutritious and appealing to students?

**Response:** We've listened to our partners and understand that after the 2012 meal pattern changes were made, many schools still faced challenges in meeting certain requirements of the meal standards. They asked for more local control- to give back some of their ability to make decisions over how best to serve meals that are appealing to students and can be adapted to local preferences, all while adhering to often limited budgets. While temporary relief was welcomed by our partners and repeatedly granted by Congress, our partners also asked for USDA to provide certainty because meal operations can require extensive forecasting and planning in order to be financially successful, and short-term fixes can make that process challenging. They have also asked for more streamlined requirements so they can spend less time on paperwork and more time doing the important work of preparing and serving meals to our Nation's schoolchildren. Lastly, they have asked for us to assist in finding increased ways for technology to help play a role in reducing operator burden and allowing our partners to efficiently run our programs in the 21st century.

- b. How did this inform the USDA's actions related to the National School Lunch program, in particular, actions taken to provide further flexibilities related to whole grains, sodium, and milk?

**Response:** The flexibilities in the final rule published in December 2018 give school nutrition professionals more control over the programs they run and greater ability to offer wholesome and appealing meals that reflect local preferences. These changes arose directly in response to comments received in response to the publication of our interim final rule, Child Nutrition Programs: Flexibilities for Milk, Whole Grains, and Sodium Requirements. These changes are not mandates; local operators who were successfully meeting the prior standards are not required to make any changes. By allowing for flexibilities in these three key areas, USDA is providing targeted relief in the places we heard concerns about most frequently from our school nutrition professionals.

2. I've heard concerns from school nutrition professionals in North Dakota that the current administrative review cycle can be burdensome. This can be especially true for smaller school nutrition providers in rural areas who may not have the staff or resources to comply with frequent administrative reviews. While we should make sure we hold these programs to the highest quality standards, I believe it also makes sense to focus on problem providers as opposed to those that remain in compliance cycle after cycle, year after year.
  - a. When it comes to administrative reviews, how can we reduce the burden on school nutrition providers while ensuring that these programs are operated effectively, and in a quality manner?

**Response:** This is an important issue, and we have heard from a range of SFAs and others about it. When considering administrative review flexibilities it is important that we balance the operational burden felt by SFAs with the need for program integrity. USDA has made many improvements to the Administrative Review process to minimize unnecessary burden and inefficiencies, and we will continue to do so and to provide intensive support on the review process. However, we recognize that many State agencies and SFAs face significant resource and time constraints, and we are committed to supporting program operators as they strive to run exceptional school meal programs.

To improve customer service and address the challenges some State agencies are experiencing, on February 22, 2019, USDA published a memorandum encouraging State agencies to request waivers of the 3-year review requirement. States can request to extend the review cycle if this better meets the circumstances in that State. We have already approved a number of administrative review cycle waiver requests and expect to receive more. We anticipate that this will relieve some of the pressure, while we continue to explore other changes to the process.

**Senator Cindy Hyde-Smith**

1. The Institute of Child Nutrition is the only federally funded national center dedicated to applied research, education and training, and technical assistance for child nutrition programs. How does USDA utilize the Institute of Child Nutrition to ensure child nutrition professionals across the country are meeting the professional standards and regulatory mandates?

**Response:** USDA's Food and Nutrition Service (FNS) and the Institute of Child Nutrition (ICN) collaborate closely to ensure child nutrition professionals across the country have access to evidence-based training, resources, and technical assistance to meet professional standards requirements and to strengthen program operator's competencies, knowledge, and skills critical to running successful child nutrition programs. As a national center, ICN provides program-related information, conducts applied research, and offers training and knowledge- and skill-building opportunities using a variety of formats, throughout the United States and US Territories.

ICN delivers presentations, seminars, workshops, pilot programs, training and technical assistance opportunities for local-level child nutrition professionals and State agency representatives. Recent trainings and hands-on technical assistance delivered by the ICN has equipped Child Nutrition program administrators and operators with essential job skills to improve program operations in topics such as: meal pattern implementation, menu planning, procurement of goods and services, financial management, leadership, and culinary skills. Current training efforts are prioritized to emphasize implementation of the updated meal patterns for the School Meals programs and the Child and Adult Care Food Program (CACFP), tailored technical assistance to enhance school food operations, as well as school meals program management for school nutrition program directors.

In addition to in-person training and technical assistance opportunities, ICN's eLearning Portal makes online learning on a variety of topics possible anytime, anywhere for Child Nutrition program administrators and operators. Currently, there are more than 50 online training courses available on ICN's eLearning Portal website at [www.theicn.org](http://www.theicn.org). These online courses include Nutrition 101, Food Safety in Schools, Culinary Techniques Series, Inventory Management, and more, as well as procurement training for State agency personnel.

Furthermore, ICN has a toll-free help desk that provides technical assistance and information to child nutrition professionals with questions about menu planning, food purchasing, implementing the meal patterns, and additional child nutrition topics.

In FY 2018, nearly 24,000 child nutrition program administrators and operators attended more than 370 job skills trainings in a variety of formats and topics, thereby supporting the accomplishment of meeting professional standards.

2. In October 2017, updated Child and Adult Care Food Program (CACFP) nutrition standards went into effect—the first major CACFP nutrition standard changes since 1968 when the program began. What measures were taken to ensure all state agencies and sponsors were adequately trained to instruct child care providers on how to implement the updated CACFP nutrition standards within their programs?

**Response:** FNS is committed to providing the guidance and tailored training States and operators need to succeed. FNS has provided an extensive array of policy guidance, training grants, technical assistance, in-person and online training, digital applications, and training materials to support States and program operators in the provision of healthy meals to children and adults and to support overall implementation of the updated CACFP meal pattern requirements.

Under the agency's Team Nutrition initiative, FNS has provided a suite of training resources for program operators to address meal planning, food purchasing, recipes, and other key topics on implementing the updated CACFP nutrition standards. These training resources also include meal pattern posters that convey, through photographs, sample meals and snacks for each age group. Over 1.5 million copies of these resources have been requested by State agencies, sponsoring organizations, and child care providers. In addition, the resources have been accessed online over 560,000 times through the Team Nutrition website. Additional training and educational materials geared towards the CACFP administrators and operators include a *Feeding Infants Guide for the CACFP*, as well as *Breastfed Babies Welcome Here!* materials.

In FY 2018, FNS awarded \$3.7 million in non-competitive grants to 38 State agencies to support meal service training in the CACFP. Each State agency received up to \$100,000 to use over a 2-year period. These grants are being used by State agencies to provide essential job skills training for CACFP program operators on meal planning, food purchasing, and accommodating special dietary needs.

To support meal service training in the CACFP, FNS has offered two webinar series, CACFP Halftime: Thirty on Thursdays and the CACFP Trainer's Circle. We are providing these two webinar series in direct response to program operators' need for short, interactive trainings on

implementing the CACFP meal patterns. Altogether, we have provided 30 webinars (in English and Spanish) through these webinar series, reaching over 35,000 CACFP program administrators and operators. These training opportunities provide essential job skills training to CACFP operators on planning, preparing, and offering healthy foods that meet the updated meal pattern requirements.

Also in response to the critical need for training resources for CACFP, FNS partnered with the Institute of Child Nutrition (ICN) to design a comprehensive training curriculum to provide State agency staff with the fundamental knowledge and skills they need to implement the updated meal patterns in every CACFP setting. Upon completion of the training, attendees were empowered to tailor the materials and conduct the same training for sponsoring organizations and centers in their States. In FY17 and FY18, 106 in-person CACFP Meal Pattern Requirements Trainings have been conducted across the country. Additionally, FNS worked closely with ICN to develop and launch three CACFP online courses to assist CACFP program administrators and operators with planning, preparing, and offering healthy meals that meet meal pattern requirements. Approximately 1,100 participants have completed these courses.

FNS maintains the Team Nutrition CACFP Organizations Network, an online network that provides CACFP institutions (sponsoring organizations and independent child care centers) with opportunities to network, collaborate, idea-share, and receive resources.

3. Keeping in mind that limited travel budgets and other restrictions are challenges for many child nutrition programs, please describe how state agencies and local districts are meeting child nutrition workforce development training needs to ensure compliance with federal regulations?

**Response:** FNS appreciates the need to support broad access to professional development opportunities across the Nation, so the Agency and the Institute of Child Nutrition (ICN) collaborate closely to offer our customers a wide range of no-cost, research-based resources and training and technical assistance opportunities, which may be delivered in a face-to-face or web-based format. ICN offers free, in-person group training on a broad range of topics for child nutrition professionals in both school and child care settings at local sites throughout the country by request. Topics include financial management and procurement; food safety; human resources; culinary skills; CACFP meal patterns, among others. Additionally, ICN routinely develops materials and conducts train-the-trainer sessions to equip State agencies, Child Nutrition Directors, and other stakeholders with the knowledge and skills necessary to conduct training for staff back in the home State, District or school or child care site.

ICN's eLearning Portal makes online learning on a variety of topics possible anytime, anywhere for child nutrition program administrators, operators, and State agency personnel. Currently, there are more than 50 online training courses available on ICN's eLearning Portal website at [www.theicn.org](http://www.theicn.org). These online courses include Nutrition 101, Food Safety in Schools, Culinary Techniques Series, Inventory Management, and more, as well as procurement training for State agency personnel.

FNS's Team Nutrition initiative also records and archives all training webinars conducted so that child nutrition professionals can access this information at a convenient time. Recent training webinars can be viewed on the FNS web site (<https://www.fns.usda.gov/tn/webinars-and-training>) and have recently focused on tactics and techniques trainers can use to empower CACFP program operators provide high-quality meals and snacks, as well as tips for planning and serving meals that align with the updated CACFP meal pattern requirements.

4. Every 5 years *The Dietary Guidelines for Americans* are updated to inform the "development of Federal food, nutrition, and health policies and programs." With an updated *Dietary Guidelines* on the horizon, what are some strategies to ensure the child nutrition workforce is responsive to the changes within the *Guidelines*?

**Response:** FNS's Team Nutrition initiative is designed to support Child Nutrition Programs by providing training and technical assistance for child nutrition professionals, based on the foundational principles set forth in the most current iteration of the *Dietary Guidelines for Americans* (Dietary Guidelines).

The National Nutrition Monitoring and Related Research Act of 1990 (Public Law 101-445) requires that any Federal food, nutrition, or health program promote the Dietary Guidelines. Upon release of the 2020-2025 Dietary Guidelines, existing Team Nutrition resources will undergo comprehensive review and revision to reflect the updated Federal nutrition guidelines, or new resources will be developed, as needed. FNS regularly holds listening sessions with program stakeholders (i.e., program operators, State agencies, and partners) to identify program needs, and also conducts formative research with program participants to test draft materials to ensure they are understood as intended, considered practical, and resonate with the target audience. This ensures that the materials developed for the child nutrition workforce, including those resources revised to align with the Dietary Guidelines, are well-received, understood, and impactful. New and updated Team Nutrition training and technical assistance materials and other supporting resources that align with the Dietary Guidelines will be disseminated to the child nutrition workforce using multiple communication channels to reach a broad audience.

#### Senator John Thune

1. There is evidence that families receiving WIC benefits want to redeem milk with fat levels they prefer rather than the required low fat and fat free milk. Additionally, some participants do not redeem or consume sufficient amounts of milk due to their preferences. These women and children may be missing out on the nutrient package of milk, which is so important due to the wide range of essential nutrients provided by milk, no matter its fat content. Is USDA aware of this issue, and do you think it makes sense to make WIC more user-friendly for the families who use it?

**Response:** USDA is aware that some participants do not redeem all of the milk prescribed in their WIC benefit. We do not collect information on the consumption levels of milk by our participants.



WIC food packages are scientifically based and designed to provide specific nutrients that benefit WIC's target population. The types and maximum monthly amounts of foods authorized are based on recommendations from the Institute of Medicine (now the National Academy of Sciences, Engineering, and Medicine (NASEM)), are consistent with the infant feeding practice guidelines of the American Academy of Pediatrics, and align with the U.S. Dietary Guidelines for Americans.

WIC regulations require nonfat (fat-free) and low-fat (1%) milks as the standard issuance for children 24 months of age and older and women. Reduced fat (2%) milk is authorized only for participants with certain conditions, including but not limited to, underweight and maternal weight loss during pregnancy. The need for reduced fat (2%) milk is determined through a nutrition assessment. Nutrition assessment is part of the eligibility determination for each WIC participant and allows the tailoring and prescribing of the food package to meet individual needs.

On January 5, 2017, the NASEM released its report, *Review of WIC Food Packages: Improving Balance and Choice* that made recommendations for the WIC food packages. USDA will use the updated scientific information from the NASEM report and the upcoming 2020 Dietary Guidelines for Americans (DGA) to inform its next course of action concerning the milk choices in the WIC food packages. USDA will use the regulatory process, as appropriate, for any proposed changes to the WIC food packages.

2. Kids need the nine essential nutrients that milk provides, including for snacks at school. For teens, larger containers of milk sold a la carte or in vending could better compete against larger containers of drinks that do not provide the same nutrient package as milk. In the context of child nutrition reauthorization, does USDA support providing schools additional flexibility regarding milk container sizes in competitive sales to ensure kids and teens are getting the milk they need?

**Response:** USDA recognizes the very significant nutritional contribution that milk makes to children's diets. That is why one of this Administration's first actions was to provide more flexibility for schools to serve milk in forms that kids like, including flavored low-fat milk.

With respect to competitive sales – foods and beverages sold outside of the reimbursable meals – the current standards are designed to support milk consumption and set container sizes for all beverages that encourage sensible portion sizes and age-appropriate calorie levels. For elementary and middle school students, milk, juice and water are the only beverages available. Allowable portion sizes for milk and juice are the same – 8 and 12 ounces respectively. At the high school level, students are allowed a broader range of options at the 12 ounce level, but the only ones available in larger sizes are those that are calorie-free.

In general, we believe that encouraging sensible portion sizes for all beverages is the right approach, but we would certainly be happy to further discuss the options for encouraging milk consumption.

**Senator Amy Klobuchar**

1. In Minnesota, we have done considerable work to assist schools in meeting current nutrition standards through enhanced education, training, and technical assistance. The 2016 reauthorization bill included a provision based on a bill that I introduced with Senator Fischer to allow USDA to study and disseminate best practices to better meet the needs of schools and students.

Would improved information on best practices and innovative efforts taken by states and local partners help schools better meet nutrition standards and utilize existing resources?

**Response:** We believe that local operators know best how to meet the needs of their students and provide nutritious, appealing meals in a way that accommodates local preferences and fits within budgetary demands. We certainly encourage and support opportunities for local partners and States to share information and best practices in order to operate efficient, world class school meals programs, and we are happy to work with Congress to explore additional strategies within this realm.

**Senator Tina Smith**

- 1) Eating disorders affect 30 million Americans during their lifetime, and currently affect over 180,000 Minnesotans. This serious mental illness is amongst the highest causes of death when it comes psychiatric illness, and it's only second to the mortality rate of opioid overdose. Eating disorders start young, with rates increasing among young girls and boys under the age of 12. Studies have shown that 1 million adolescents every month resort to weight-control behaviors such as extreme dieting or purging.
  - a. What has your agency done to ensure that the policies and programs your agency implements within schools do not trigger youth at-risk of eating disorders or harm youth experiencing an eating disorder?
  - b. Do school-based policies and programs incorporate eating disorder prevention and screenings?

**Response:** While eating disorder prevention programs, and similar programs designed to address mental illness in children and teens, fall outside the scope of the USDA Child Nutrition Programs, USDA is committed to helping children and teens establish healthy dietary habits. Meals and snacks offered through the Child Nutrition Programs provide a balanced approach to eating, and include a wide variety of foods from all of the food groups. Nutrition education messages focus on where foods come from and how the nutrition they provide can help children and teens get the nutrition they need to move, grow, and be healthy.

Federal law requires local educational agencies (LEAs) participating in the National School Lunch Program or School Breakfast Program to develop and implement a local school wellness policy. LEAs may elect to incorporate eating disorder prevention strategies into their local school wellness policies if they desire. The school district is required to engage students, parents, teachers, food service professionals, health professionals, and other interested community

members in developing, implementing, monitoring, and reviewing district-wide nutrition and physical activities.

2) By statute, school food authorities are required to Buy American for school lunches. While this has been law since 1988, it is increasingly common for schools to serve foreign products. Lack of enforcement of the Buy American provisions takes business opportunities away from domestic agriculture producers, which is a concern for many farmers in Minnesota.

a. What steps is the USDA taking to enforce full compliance of the Buy American requirements?

**Response:** The Buy American provision supports the mission of the Child Nutrition Programs, which is to serve children nutritious meals and support American agriculture. USDA plays a vital role in helping State and local operators understand and execute this important provision. In addition, USDA Foods and USDA Farm to School efforts help school food authorities (SFAs) serve foods produced and processed in the United States as part of school meals.

The Buy American requirements are currently monitored and enforced by State agencies through regular administrative and procurement reviews of SFAs. USDA monitors States' oversight and review of the Buy American provisions through the Management Evaluation process.

All States participating in National School Lunch Program also have access to USDA Foods, which are nutritious and 100 percent domestically-produced foods purchased by USDA. Many States choose to obtain products such as fruits and vegetables through USDA Foods since those items can sometimes be challenging to ensure they are domestically produced through retail or wholesale procurement channels. USDA Foods make up about 15-20 percent of the items served in the school meal program.

USDA farm to school efforts also support the Buy American provision, as local foods are by default American goods. On an annual basis, USDA awards competitive Farm to School grants to be used for training, supporting operations, planning, purchasing equipment, developing school gardens, developing partnerships, and implementing farm to school programs. Since the grant program's inception in FY2013, USDA has invested over \$30 million in farm to school grant funds in all 50 states as well as the District of Columbia, Puerto Rico, and the U.S. Virgin Islands. In FY 2019, USDA expects to award approximately \$7.5 million in grant funds to schools, school districts, state and local agencies, non-profit organizations, Indian tribal organizations, and agricultural producers to plan, train, or implement Farm to School programs.

FNS is continuing to work with States and SFAs to ensure that they have the tools and resources they need to monitor and comply with the Buy American provision. We currently provide training, in collaboration with the Institute of Child Nutrition, for school nutrition professionals on this provision. As part of our response to section 4207, Buy American Requirements, included in the Farm Bill, we expect further information on this provision will be forthcoming this summer.

**Senate Committee on Agriculture, Nutrition, & Forestry**  
Perspectives on Child Nutrition Reauthorization  
April 10, 2019  
Questions for the Record  
Kathryn Larin

Chairman Pat Roberts

1. **Your written testimony referenced two 2014 GAO reports on school meals. In particular, please elaborate for the Committee how state oversight of local school food authorities is integral to child nutrition program integrity. Please share any areas of intergovernmental coordination that could be improved.**

Federal, state, and local entities all play important roles in ensuring school meals program integrity. At the federal level, the school meals programs are overseen by the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) through its headquarters and regional offices. FNS defines program requirements, monitors state compliance with program requirements, and provides reimbursements to states for meals served. FNS also issues guidance defining the criteria used to determine whether students in participating schools are eligible to receive free or reduced-price meals and the related oversight requirements for states and school districts. States enter into written agreements with local school food authorities (SFA), which are generally aligned with school districts, to administer the school meal programs. States also provide federal reimbursements to SFAs and oversee SFA compliance with program requirements. At the local level, SFAs are responsible for planning, preparing, and serving meals to students in schools that meet federal requirements. School districts are responsible for activities related to obtaining student applications for free or reduced-price school meals, certifying eligible students for such meals, and verifying certification.

As required by the National School Lunch Act, the oversight and monitoring framework for the school meals programs is intended to help ensure that meals served meet content and nutrition requirements and that SFAs follow required eligibility and financial practices and maintain sound financial health. Although states have been required to regularly review SFA administration of the National School Lunch Program for over two decades, the Healthy, Hunger-Free Kids Act of 2010 required USDA to amend its unified accountability system to ensure SFA compliance with requirements for all school meal programs. The school meals programs' oversight and monitoring requirements are part of the programs' internal controls, which are an integral component of management. Effective internal controls include creating an organizational culture that promotes accountability and the reduction of errors, analyzing program operations to identify areas that present the risk of error, making policy and program changes to address the identified risks, and monitoring the results and communicating the lessons learned to support further improvement.

As we reported in GAO-19-506T, the school meals programs have been found to have a relatively high incidence of program errors, or improper payments. Over time, USDA has undertaken a variety of corrective actions aimed at reducing improper payments in these programs, yet their improper payment rates remained relatively steady. Because of the programs' structure, coordination between the federal, state, and local entities involved in ensuring school meals program integrity is likely necessary to reduce program errors. Although FNS has addressed all of the recommendations we made aimed at improving program integrity in our two 2014 reports on school meals, GAO-14-104 and GAO-14-262, we have not assessed certain areas since that time and therefore do not know if previously-identified issues with state monitoring of SFAs have been fully remediated. For example, states had not been required to assess SFA's financial management during monitoring reviews until FNS made changes to the unified accountability system for the programs following the Healthy Hunger-Free Kids Act of 2010. We found in 2014 that states were in need of guidance and training related to SFA financial management oversight, and while FNS provided additional guidance and training to states in response to our recommendation, we have not assessed whether the information provided addressed states' needs.

2. **Your written statement indicates that of the 14 GAO recommendations, USDA has addressed nine, taken steps to address one and is planning to address the remaining four. Please elaborate on the status of each of those recommendations individually.**

In our reports on child nutrition issued from 2013 through 2018 that included recommendations related to improving program integrity, we made 14 recommendations to USDA. The recommendations and their status as of April 10, 2019 are listed below in the order they are discussed in GAO-19-506T. For all GAO recommendations, additional information on recommendation status, including comments about actions USDA has taken or plans to take, is available at [www.gao.gov](http://www.gao.gov) on each report's webpage.

	Recommendation	Status
<b>GAO-14-104:</b>		
1	To improve program integrity, as USDA moves forward with its new administrative review process, the Secretary of Agriculture should direct the Administrator for the Food and Nutrition Service to clarify to states the importance of documenting compliance issues found during administrative reviews and requiring corrective actions to address them.	Closed – implemented

2	To improve program integrity, as USDA moves forward with its new administrative review process, the Secretary of Agriculture should direct the Administrator for the Food and Nutrition Service to continue efforts to systematically assess all states' needs for information to improve their ability to oversee SFA financial management and provide assistance to meet identified needs.	Closed – implemented
<i>GAO-14-262:</i>		
3	To improve integrity and oversight of the school-meals programs, the Secretary of Agriculture should evaluate the data collected on for-cause verifications for the 2013-2014 school year to determine if for-cause verification outcomes should be reported separately, and if appropriate, develop and disseminate additional guidance for conducting for-cause verification that includes criteria for identifying possible indicators of questionable or ineligible applications.	Closed – implemented
4	To improve integrity and oversight of the school-meals programs, the Secretary of Agriculture should develop and assess a pilot program to explore the feasibility of computer matching school meal participants with other sources of household income, such as state income databases, to identify potentially ineligible households--those with income exceeding program-eligibility thresholds--for verification.	Closed – implemented

5	To improve integrity and oversight of the school-meals programs, if the pilot program shows promise in identifying ineligible households, the Secretary of Agriculture should develop a legislative proposal to expand the statutorily-defined verification process to include this independent electronic verification for a sample of all school-meals applications.	Closed – implemented
6	To improve integrity and oversight of the school-meals programs, the Secretary of Agriculture should explore the feasibility of verifying the eligibility of a sample of applications that indicate categorical eligibility for program benefits and are thus not subject to standard verification.	Closed – implemented
GAO-13-290:		
7	To improve WIC oversight and administration, the Secretary of Agriculture should direct FNS to develop a timeline for reviewing Management Evaluation reports to assess program risks at a national level and target assistance to states.	Closed – implemented
GAO-15-94:		
8	To better ensure that WIC participants are aware of the prohibition against selling WIC formula, and to assist states' efforts to prevent and address online formula sales, the Secretary of Agriculture should direct the Administrator of FNS to instruct state agencies to include in the rights and responsibilities statement that participants are not allowed to sell WIC food benefits, including online.	Closed – implemented

9	To better ensure that WIC participants are aware of the prohibition against selling WIC formula, and to assist states' efforts to prevent and address online formula sales, the Secretary of Agriculture should direct the Administrator of FNS to require state agencies to articulate their procedures for identifying attempted sales of WIC food benefits in their WIC state plans and analyze the information to ascertain the national extent of state efforts.	Closed – implemented
10	To better ensure that WIC participants are aware of the prohibition against selling WIC formula, and to assist states' efforts to prevent and address online formula sales, the Secretary of Agriculture should direct the Administrator of FNS to collect information to help assess the national extent of attempted online sales of WIC formula benefits and determine cost-effective techniques states can use to monitor online classified advertisements.	Open – In July 2018, a USDA contractor completed a study intended to provide information to assess the prevalence of online sales of WIC formula and identify cost-effective techniques states can use to monitor and prevent them. However, FNS indicated that it would not be releasing the study to states, in part because it included information that was investigative in nature. In April 2019, FNS officials indicated that they are currently developing guidance on best practices and cost-effective techniques identified in the report to disseminate to WIC state agencies later in 2019. Informing states of cost-effective techniques for monitoring and preventing online WIC formula sales would address the recommendation.
GAO-18-369:		
11	The Administrator of the Food and Nutrition Service (FNS) should improve its estimate of children's participation in the SFSP by focusing on addressing, at a minimum, data reliability issues caused by variations in the number of operating days of meal sites and in the months in which states see the greatest number of meals served.	Open – In March 2019, FNS indicated that it anticipates completing an evaluation of how SFSP participation is calculated by summer 2020. We will continue to monitor FNS actions to address this recommendation, including the status of its evaluation and steps taken to improve the agency's estimate of children participating in SFSP.



<p>12</p>	<p>The Administrator of FNS should communicate to all SFSP stakeholders the circumstances it considers in approving requests for flexibility with respect to the requirement that children consume SFSP meals on-site in areas that have experienced crime and violence, taking into account the feasibility of accessing data needed for approval, to ensure safe delivery of meals to children.</p>	<p>Open – In late May 2018, FNS provided guidance to states regarding changes in policies related to SFSP waivers and demonstration projects and held a webinar to clarify the changes. In March 2019, FNS reported to us that this guidance and the webinar provided information about participation in the demonstration for exceptional circumstances, which is the means through which FNS had granted states and program providers flexibility for children to consume SFSP meals off-site in areas that had experienced crime and violence. However, the guidance documents do not directly acknowledge that FNS includes areas with crime and violence as exceptional circumstances for purposes of the demonstration, and neither the guidance nor the webinar provided new information about the circumstances FNS considers when granting the flexibility for such areas. We will therefore continue to monitor FNS actions to address this recommendation.</p>
<p>13</p>	<p>The Administrator of FNS should evaluate and annually report to Congress, as required by statute, on its use of waivers and demonstration projects to grant states and sponsors flexibility with respect to the requirement that children consume SFSP meals on-site in areas experiencing crime or violence, to improve its understanding of the use and impact of granting these flexibilities on meeting program goals.</p>	<p>Open – In March 2019, FNS reported to us that they had drafted the report to Congress on the agency’s use of waivers and demonstration projects for SFSP, it was being reviewed internally, and they planned to submit the final report to Congress following that review. We will consider this recommendation closed as implemented when FNS submits the final report to Congress.</p>

14	The Administrator of FNS should disseminate information about existing flexibilities available to state agencies to streamline administrative requirements for sponsors participating in the SFSP and other child nutrition programs to help lessen the administrative burden. For example, FNS could re-distribute existing guidance to state agencies that explains available flexibilities and encourage information sharing.	Open – In March 2019, FNS indicated that it plans to address streamlining flexibilities that impact the SFSP and other child nutrition programs in a future regulatory action. We will therefore continue to monitor FNS’s progress with this rule-making and any other actions taken to address this recommendation.
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**3. Would you characterize USDA’s Food and Nutrition Service as a willing partner in your efforts to address program improvements? Please provide examples.**

In recent years, USDA’s FNS has accepted our findings and been generally responsive to our recommendations related to improving the integrity of child nutrition programs. As noted in GAO-19-506T, FNS generally agreed with all of the recommendations we made related to improving program integrity in the child nutrition programs in our related reports issued from 2013 through 2018. Further, as noted in our responses above, USDA has taken actions to address many of these recommendations since the reports were issued.

**Senate Committee on Agriculture, Nutrition, & Forestry**  
Perspectives on Child Nutrition Reauthorization  
April 10, 2019  
Questions for the Record  
**Josh Mathiasmeier**

**Chairman Pat Roberts**

1. Since nearly all Kansas schools—including Kansas City Kansas Public Schools—were in compliance with the school nutrition standards prior to the flexibility to nutrition standards provided recently by the U.S. Department of Agriculture, can you explain why this flexibility is helpful?
  - a. The flexibility offered by USDA allows for schools to use innovative approaches to meal service. For example, at KCKPS, we are planning on serving a tamale as a part of our menu for next school year. There are not many tamales available that meet the USDA nutrition standards as they were written because this is not an area that has had much demand. Through the flexibilities, we are able to find a tamale that meets our students' quality needs while also meeting the daily and weekly requirements by USDA.
2. In your testimony, you highlighted the 100-plus hours of administrative time and the duplicative reporting and site visits for each separate meal or snack program your schools operate. Please elaborate or provide examples of where there is currently duplication, or examples of potential streamlining of these administrative redundancies that could better serve stakeholders without sacrificing program integrity.
  - a. At KCKPS, there is a real possibility that a single site could have all of the following Child Nutrition Programs: breakfast, lunch, afterschool snack, afterschool supper, and summer meals. If that was the case, we would be required to perform site visits a total of 9 times in a single program year. Additionally, there are separate forms used when completing site visits for different programs. If we were able to use a single form and complete a site visit where multiple programs were reviewed for the same areas, the amount of administrative time would be significantly reduced. The same can be said of the State Agency who completes regular audits at the same site for different programs.

**Senator Debbie Stabenow**

1. It's great to hear you have been expanding your breakfast service through "Grab and Go" and Breakfast in the Classroom options. What would you say is the biggest barrier to expanding breakfast service in more of your schools?
  - a. A couple barriers come to mind when expanding breakfast programs at KCKPS; facilities and administrative support. Many of our existing buildings do not have the facilities capable of supporting the transition from traditional breakfast to innovative breakfast. Through capital improvements and remodeling, we are able to make some strides in addressing this challenge. Any change of a program, or implementation of a new idea, takes a group of people including the district administration, school administration, teachers, custodial staff and nutritional services staff. Getting everyone on the same page can be challenging but we know that there is a huge positive impact by having students start their day with a healthy breakfast.

**Senator John Hoeven**

1. As you mention in your testimony, Kansas City, Kansas Public Schools (KCKPS) serves 32,000 meals per day through various child nutrition programs. You go on to say that the programs however have inconsistent requirements – for example, more meat is required for some programs than others, there is inconsistent milk standards, etc. As you note, when applied to an operation as large as KCKPS, it can make the administration of these meals challenging.
  - a. How could streamlining requirements amongst child nutrition programs while providing additional flexibility to help meet the unique needs of students assist with your day-to-day operations?
    - i. The streamlining amongst child nutrition programs would enable us to simplify our operations and put more focus on the customer. For example, we currently have a breakfast menu only for our Head Start students due to the differences between the meal pattern of the Child and Adult Care Food Program and the School Breakfast Program. The rest of our buildings have a different breakfast menu with more expanded choices. By streamlining the regulations, we would be able to streamline and simplify our operations at all levels in all programs.
2. The USDA provided flexibility to rules surrounding whole grains, sodium levels, and milk in the school lunch program. Leading up to this rules change, I worked on this issue with many school nutrition providers in North Dakota who agreed that additional flexibility would allow them to continue to provide quality meals while still meeting their budgets.
  - a. What has been the impact of this rule change within your school district?
    - i. This rule change has allowed us to continue focusing on innovative approaches to providing high quality meals to our students. An example mentioned in response to Chairman Robert's question is our desire to serve a tamale in our district next year. The flexibilities allow for us to be innovative in providing high quality meals while also staying within the regulations and budget.
  - b. To provide greater certainty in planning operations, do you believe that this flexibility should be made permanent?
    - i. I believe that certainty helps both program operators and our industry partners. By providing certainty and consistency, operators can create multi-year plans for both meals and operations, as can our industry partners. Uncertainty is the greatest threat to innovation.

**Senator Amy Klobuchar**

1. In the United States, eating disorders are more common than breast cancer or Alzheimer's. That's why I worked to pass the Anna Westin Act, which will ensure that people suffering from eating disorders get the treatment they need. Research has suggested that the recent focus on obesity prevention needs to also take into account the needs of youth at risk of developing an eating disorder.
  - a. From your perspectives, can more be done to protect youth at risk for eating disorders?
    - i. At KCKPS, I am not regularly involved with students and handling of eating disorders. As a registered dietitian, I always think more can be done to educate students and staff about eating disorders and ensure that the risk factors are identified and help is provided as soon as possible.
  - b. Would incorporating eating disorder prevention and other long-term health approaches in school wellness programs better promote student health?
    - i. Student health is extremely important and I would support any program designed to help prevent eating disorders.

**Senate Committee on Agriculture, Nutrition, & Forestry**  
Perspectives on Child Nutrition Reauthorization  
April 10, 2019  
Questions for the Record  
**Michael J. Halligan**

**Chairman Pat Roberts**

- 1. I appreciate the work you are doing to reach children in remote areas, particularly for the Summer Meals program. How do you manage these efforts outside the “congregate feeding requirement?” What rule changes would allow you and others to do more?**

Thank you, Chairman Roberts. God’s Pantry Food Bank is working hard every day, like many other Feeding America food banks and hundreds of dedicated Summer Food Service Program providers across the United States, to improve nutrition for children in the summer when access to food can be a significant struggle. Research has shown that families with children who benefit from the National School Lunch Program spend an extra \$300 every month of the summer to feed their children. With gas prices approaching \$3/gallon it is not economically viable for rural households to drive long distances every day to congregate for a \$1 snack or a \$4 lunch. Congress should allow alternate program models to compliment, not eliminate, the congregate feeding requirement in underserved, rural and other hard-to-reach areas.

Specifically:

- Include in reauthorization modifications to the Congregate Feeding Requirement so that reimbursed meals can be distributed to recipients by community providers and then consumed by those children, when necessary, at a later time in their home or elsewhere without the supervision of a sponsor or community provider.
- Include in reauthorization the ability for all states in our nation to utilize the demonstrated efficiency of a \$60 monthly Summer Grocery Card aligning with the needs of families who can’t afford daily trips into town to congregate and who may be further limited to a weekly shopping trip to a supermarket to simply buy groceries.

We believe providing community providers more options where congregate sites are not available or that can only be open for a day or two during the week will strengthen not damage the meal sites we already sponsor. If providers are able to use the resources that they have more efficiently, we can focus private funds on strengthening programs and participation. Through use of private funds our sister food banks have found that program participation increases by offering meals that kids can take home when a site is not open, making the congregate site programs stronger and more sustainable.

**2. If you can, please provide other examples of potential program improvements or flexibilities that would allow you to better serve or provide access to people in rural areas?**

Children must have the nutrition they need to grow and thrive. Hunger is challenging for anyone, but can be particularly scary and stressful for children when they don't know where their next meal is coming from. We work every day throughout the year to make sure children have the nutrition they need but it is often an uphill battle. We strive to keep children and their family front and center when we think about feeding programs, making the process of getting food – such an important and basic need – as easy and seamless as possible.

To strengthen child nutrition programming and reach more children when they are out of school, we recommend that community providers be able to operate one program year-round through SFSP which would reduce red tape and streamline federal child nutrition programs by using the same nutritional standards, reimbursement rates, training, and administrative requirements. Having sites that are able to stay open year-round makes it easier on families and kids through the consistency around what to expect and where to go. When sites only operate part of the year, families must bounce around until they find something that is open. Streamlining operations would reduce administrative costs, incent existing providers to expand their operations, and encourage new providers to get involved.

To further encourage more sites to participate, the area eligibility requirement should be changed to from 50% to 40% to be consistent with other federal programs and to make it easier for sites to operate in communities with concentrations of low-income children.

Congress should also significantly expand the summer EBT program in order to reach more kids, especially those in rural and other hard to reach areas. During the school year, kids have the stability of a school setting where they know they will have food available to them. When they break for the summer, they lose that infrastructure and the security of knowing where their meal will come from. Summer also means significant pressure on families to make sure they have enough food to make up for what their children received at school. While we are committed to expanding summer feeding sites, the best way to reach children in rural and other hard to reach communities where sites are not feasible or practical is to provide communities different options for ways to get food to kids, such as providing families with a summer EBT card.

The Summer EBT demonstration projects showed that operating this summer option through SNAP led to more families taking advantage of the benefit. The summer EBT demonstration projects administered by USDA starting in 2011 met their two stated goals. First, the evaluations found that food insecurity was substantially reduced among children. Very low food security among children was reduced by 33 percent among participants. Second, the program reached a significant proportion of children eligible for free and reduced-price school meals. Participation rates over the course of the pilots ranged from around 30 percent to as high as more than 90 percent (depending on the method of enrollment and demonstration site). Each



year, participation in the summer EBT models were significantly higher than the June 2018 estimated 1 in 12 participation rates shown by the Food Research and Action Center for eligible Kentucky children served through traditional site-based SFSP programs.

Communities should have the ability to pick a summer feeding model that works best for their unique circumstances. We see different program options like summer EBT working together in a complementary way to allow wholesome nutritious food to reach more children in the summer. In communities that have strong sites that provide programming, we want to continue to support congregate meals. In areas where sites are not feasible, we would like to use the flexibility of non-congregate feeding to reach those who are in need and qualify for summer meals. In areas that are more remote and we are unable to efficiently and effectively reach, we believe a summer EBT program can best reach children in need.

**Senator Debbie Stabenow**

- 1. You mentioned that only 18% of children in Kentucky that participate in school lunch are getting summer meals. You also listed some ways to improve congregate feeding and provide some flexibility to reach more kids in the summer. Do you believe that these efforts can be complimentary?**

The site-based, congregate model is important. However, data from FRAC and the Kentucky Department of Education show that meals served in a 2018 summer month are only 18% of those served in Kentucky via the National School Lunch Program during the prior school year. Clearly fewer children are receiving summer meals. This is not good enough. We believe we can expand not damage the meal sites we already sponsor by strengthening the site-based program and providing community providers some flexibility in the options available for hard to reach and underserved areas.

Barriers to summer feeding programs are magnified in suburban and rural areas. Summer feeding sites are more likely to operate in communities with the infrastructure in place to host a site. This might start with schools open during the summer for summer school or other programming. Beyond that, many other community organizations like Boys and Girls Clubs, summer camps, church groups and city recreation centers serve as sites as they are often locations where low-income children congregate. But as we move outside of geographic areas where sites are more easily accessible to children, transportation barriers are magnified. As we've seen the suburbanization of poverty, many communities have not been able to provide summer feeding sites in locations that enable enough low-income children to participate and make the program sustainable. This is of particular concern in communities with concentrations of poverty but who might not meet the criteria to operate as an open site in the summer program. We have worked closely in all communities, including those in suburban areas, to try and find sites.

Allowing alternate models to the congregate feeding requirements will complement site-based models. There is no denying that congregate feeding sites, when they are accessible for a child and family, provide educational, social and interpersonal skill development opportunities. But imagine the challenge a single parent might face who works a part-time job three days a week, perhaps on Monday, Wednesday, and Friday. How does her child congregate to access meals on Tuesday or Thursday particularly if the parent has limited access to transportation or has to travel long distances to access the child's meal? Child nutrition programs are only effective when they reach the children who need help. Modifying the requirement to allow the community provider to offer reimbursable "sack" lunches for consumption on Tuesday and Thursday would help this family, ensuring sound nutrition for the child throughout the week.

Every community is different. We see that in suburban, rural and urban communities that we serve. Communities should have the ability to pick a summer feeding model that works best in their unique circumstances. We see different program options working together in a complementary way to allow good nutritious food to reach more children in the summer. For example, in communities that have strong sites that provide programming, we want to continue to support congregate meals. In areas where sites are not feasible, we would like to use the flexibility of non-congregate feeding to reach those who are in need and qualify for summer meals. In areas that are more remote and we are unable to efficiently and effectively reach, we believe a summer EBT program can best reach children in need.

**2. In addition to sponsoring summer meals sites, you mentioned that your food bank also sponsors backpack programs to help reach additional children during the summer. Those meals cannot currently be reimbursed through the Summer Food Service Program. Can you elaborate on some of the barriers that make programs like this necessary in your community?**

God's Pantry Food Bank sponsors 19 Back Pack programs in two counties and supports several more of these privately funded programs across our service area. These programs provide critical weekend sustenance to some of the children who receive meals through the National School Lunch Program during the week but are currently not reimbursed through federal child nutrition programs due to restrictive structures.

Our program design mirrors the concepts first envisioned by a school nurse and a food bank in 1995 in Little Rock, Arkansas. The nurse had seen for herself how food scarcity apart from cafeteria lunches was affecting children's physical health, classroom behavior and ability to learn. When children ended up in the nurse's office on Monday mornings complaining of stomachaches and dizziness, the community realized that the children had had little to eat since their last school lunch on Friday. In response to her concerns, the Arkansas Rice Depot started the Food for Kids program, providing hungry students in that school with groceries in non-descript backpacks.

We know that the back pack program is really important to the children who participate. One parent told us a story that her child wanted to go to school one Friday morning even though he was very sick. He begged his mom to go to school and the parent quite wisely would not allow him. "But Mom, I'll miss out on the back pack food." The child asked his mom to call the school and staff assured the parent they would set aside his backpack to retrieve when he was well enough to return.

Many low-income children struggle with hunger over the weekend but current program requirements make it difficult for communities to support them. SFSP and CACFP can be used to provide meals to children when school is not in session, but children are required to consume meals on-site. Without designated space to house an on-site program or a busing system to transport children, the logistics are usually too difficult to operate a weekend feeding site. Similar to the successful demonstration projects waiving the congregate requirement in the Summer Food Service Program (SFSP), communities should be allowed to innovate more effective ways to reach kids on weekends, such as sending children at risk of hunger home from school with a backpack of nutritious meals or child-friendly groceries on Friday afternoons. We would like to see options like these be made available through reauthorization, to allow states interested in using these models to reach more kids – to give food banks like God's Pantry Food Bank, the Arkansas Food Bank, and others more tools in our toolbox to partner with more schools and more parent groups to reach kids in hard to reach areas.

Many communities have leveraged private funding to operate programs that send children home with child-friendly groceries on the weekend. Weekend back pack programs have been successfully replicated across the country with private funding. However, because funds are limited, programs are not available in every community. Even in communities where weekend back pack programs are operating, the program may not be available in every low-income school or have sufficient funding to serve every child in need. Supporting innovative options like back pack programs through reauthorization allows communities providers the ability to focus private funds on strengthening programs and participation to consistently feed more children more nutritious food throughout the entire week and weekend.

**Senator John Hoeven**

- 1. You note in your testimony that God's Pantry Food Bank utilizes both the Summer Food Service Program (SFSP) and the Child and Adult Care Food Program (CACFP), two very similar programs which you administer at the same site. You mention how the programs have different paperwork, nutrition requirements, reimbursement rates, and training requirements.**
  - a. How would more consistency between summer and afterschool meal programs assist in your efforts to continue to provide meals for children?**

**b. Do you believe that greater alignment between these programs would encourage more food banks to participate?**

In the past year we sponsored 12 after school programs and 31 summer feeding programs. Only 10 community providers did both. Allowing our food bank and other community-based organizations to operate one program – the Summer Food Service Program (SFSP) – to feed kids year-round would be the best way to reduce administrative burdens. We work with afterschool programs to provide them with nutritious meals during the school year and serve many of those same providers during the summer as well. But two times every year we have to switch completely from one program to the other, even though in many cases we are serving the same kids at the same sites. That’s two of everything.

- Duplicative administrative requirements: We have two different sets of rules, regulations and methods for running each program. We have to apply twice, once for each program. We have to get health inspections. We have to conduct separate training and monitoring, often for the same staff just months apart just to explain the administrative differences between programs.

Operating one program would help significantly. Stopping and starting programs is very expensive and we have to do this every year. A simplified, year-round operation is already available to schools who can already feed children year-round through the National School Lunch Program’s Seamless Summer Option. This concept should also be available to nonprofit organizations and local government agencies. Operating a single program year-round is the simplest solution, and it is critical for program operations to be streamlined through the best available mechanism to address very specific operational pain points mentioned in earlier testimony. Regulations should be consistent throughout the year, including applications and inspections required when setting up programs, monitoring operations, and meeting reporting requirements.

Reducing unnecessary duplication and paperwork would free up resources, allowing existing providers to expand operations throughout the year and incentivize new sponsors and sites to come on board. This allows more options for kids both in the summer and afterschool. Our food bank is fully committed to finding ways to feed kids who are hungry, wherever they are and whatever time of year. Here are a few examples of how streamlining program operations would improve the program:

- Reduce staff time on administration, focus on expansion: We have to dedicate significant staff time to managing the administration and procedures of multiple programs. This is a horribly inefficient use of staff resources and talent. Operating one program would free up staff time to be able to focus on expanding to new sites and improving the program, rather than simply pushing paperwork.
- Ease burden on smaller providers: Our food bank is large enough and has the resources to be able to manage the burden of multiple programs. But smaller food banks and

providers often cannot. Because of this, assuming they can find the resources to operate at all, many operate only one program and, therefore, only reach kids during part of the year. If the programs were streamlined, existing providers of one program are more likely to continue year-round and simpler program administration will also help incentivize new providers and sites to come on board.

- **Make it easier for families:** When sites are able to stay open year-round, this also makes it easier on families and kids to have consistency around what to expect and where to go for assistance. When sites only operate part of the year, families must bounce around until they find a site or program that is open.

Like many other food banks, we dedicate resources to making summer feeding programs successful. This is particularly true for rural and other hard to reach areas where it costs more to operate. Each dollar saved through reducing red tape is another dollar we're able to invest in building program and outreach capacity to reach underserved and hard to serve areas. For summer meals, this means we, as a sponsor, would be able to support additional sites or provide meals to children through alternate delivery models like backpacks. For smaller providers or those considering whether to get started, this would change their cost analysis and provide incentive to operate. Every community is different and we see that within the area we serve. By freeing up resources, we would be able to spend more time understanding each community's unique needs and designing a sustainable program model that feeds kids in the summer.



Responses to Questions for the Record from  
Lauren Waits, Director of Government Affairs

On behalf of the  
Atlanta Community Food Bank and the  
Georgia WIC Working Group

Before the  
Senate Committee on Agriculture, Nutrition & Forestry  
Perspectives on Child Nutrition Reauthorization

April 25, 2019

**Chairman Pat Roberts**

**Question 1.** I appreciate the Atlanta Community Food Bank seeing a potential need and stepping forward to find ways to reach WIC-eligible populations. Please share how technology modernization, such as moving to WIC-EBT, or other approaches identified in your focus group research, could help streamline the WIC program between and among state administrators, health centers, participants, and vendors.

**Response:** At the Atlanta Community Food Bank we are viewing WIC technology modernization through several lenses. Of foremost importance is how eligible families might be better recruited and retained in the program due to technology. Our focus group participants gave a full-throated endorsement of technology modernization and use of consumer-friendly platforms for the WIC program. The facilitator described two different kinds of technology solutions; administrative technology such as online enrollment, eligibility confirmation and in-store benefit payment systems; and personal applications such as nutrition information, product identification, wellness supports and child development monitoring. Both were warmly praised. As I mentioned, 100% of participants, who were selected because they were eligible but not currently enrolled in WIC, access the internet regularly through personal smartphones. They told us that adoption of WIC EBT, online certification and recertification, and the full range of health and wellness apps would make them more likely to enroll and fully participate in WIC. Until recently, state and local WIC agencies that wanted to adopt such technology didn't have much support to help them select, procure, and implement technology solutions. A recent guide published by Social Interest Solutions, the National WIC Association, and the Center on Budget and Policy Priorities ([www.cbpp.org/wicparticipanttechnology](http://www.cbpp.org/wicparticipanttechnology)) will help WIC agencies navigate this process.

From an organizational point of view, we are also eager for WIC to adopt modern technology solutions, and in particular those solutions that generate population data to inform outreach and retention strategies across the sectors you identify; state administrators, health centers, participants and vendors. One of the key achievements of the Georgia WIC Working Group has been to encourage cross sector



collaboration on information sharing. Approximately two years ago we sought to compare our state's Medicaid participation rates with WIC enrollment, filing a public information request with the support of the Georgia WIC team. We are seeking to establish a baseline from which to estimate appropriate participation rates for all of Georgia's diverse communities. However, data-sharing required the development and signing of a Memorandum of Understanding between our public health and community health departments, which took over one year to complete. There are several states that are already doing this kind of data sharing and using it to identify and try to enroll eligible families that are not participating in WIC, but to my knowledge this sensible practice is not widespread. Because Georgia recently adopted a comprehensive benefits enrollment system that includes SNAP, Medicaid, TANF and WIC, among others, we too should be able to analyze cross-sector enrollment trends, and when WIC EBT goes live in October 2020 those analyses could also include voucher redemption information to tell us what food benefits are being used and when. But for all the technologies that can be purchased and installed, performance metrics for enrollment, certification and program participation must be established to encourage program administrators, including those outside WIC, to support the broad data analysis that we need in order to do effective market segmentation and targeted program outreach.

**Question 2.** Please provide other examples of potential program improvements or flexibilities that would allow your organization to better serve or provide access to people in rural areas.

**Response:** Rural communities in Georgia are particularly challenged at the present time and we are eager to participate in, and champion, mechanisms that increase access to WIC for rural residents. WIC Working Group members include healthcare providers, social service organizations and the statewide food bank network. With our nonprofit partners we will continue to share WIC promotional information and support participation with the resources that we can rally across the state. Because of transportation costs and the longer distances involved, rural residents are often limited in the number of times they can make a physical visit to a WIC clinic and/or a grocery store providing WIC foods. Longer periods of continuous enrollment are needed to minimize the physical demands of participation and maximize families' opportunities for engagement with the program over time. We support the National WIC Association's recommendation to extend certification periods for children under two years, and to lift the age of eligibility to six years. More flexibility to conduct appointments using video technology and accept documents electronically would also be helpful, as would more flexibility to get all family members on the same certification schedule.

Senator Debbie Stabenow

**Question 1.** Participation has been declining in WIC for several years and, while some of this decline can be attributed to an improved economy and falling birthrates, there are clearly other factors at play. You mentioned that WIC moms' customer service experience plays a huge role in allowing them to continue to benefit from the program. How could extending certification periods address some of these customer service concerns?



**Response:** Focus group participants essentially told us that they make a value judgement between WIC's benefits and the hurdles or hassle they experience in participating. Those who used WIC to help pay for expensive infant formula, for example, found clinic waiting room delays or negative attitudes from people at the grocery store to be well worth the time or discomfort. However, as the value of the food benefit drops, families' patience and enthusiasm may drop accordingly.

An extended certification period means that families could keep their WIC benefit without having to make time so many time-consuming visits to a clinic, which sometimes mean missing work or pulling a child out of care. Assuming modern technologies are made available at the same time, they would still be able to participate in nutrition education classes, receive breastfeeding support, and monitor their child's nutritional health—important non-food WIC benefits. An extended certification period also means that a family has more opportunities to familiarize themselves with how the program works inside the grocery store. The more frequently they can use the program, the easier it becomes to identify WIC-eligible products, and this also reduces the amount of time or confusion that families may experience while making WIC purchases. Families whose four-year old child is already participating in WIC will be able to take advantage of this improved customer experience for an additional year—and assure the additional nourishment until she has access to free or reduced-price meals at school.



**Senate Committee on Agriculture, Nutrition, & Forestry**  
Perspectives on Child Nutrition Reauthorization  
April 10, 2019  
Questions for the Record  
**Kati Wagner**

**Chairman Pat Roberts**

1. In your testimony regarding the Child and Adult Care Food Program (CACFP), you referenced proposals for program improvements that do not increase the cost of the program. Please outline them for the Committee.

**NCA Response:**

- 1.1 Sponsors of child care homes receive two reimbursement checks from USDA. One check is for the providers claim reimbursement and the second check is for the sponsors administrative costs. The 2010 Reauthorization made it possible for sponsors of child care homes could carryover up to 10% of their reimbursement into the next fiscal year.

It will improve program efficiency with no increase to program costs by allowing sponsors of child care centers to be afforded the same opportunity to carryover 10% of administrative funds.

- 1.2 Enrollment forms for participation in the CACFP require that the parent document the normal days and hours of care and the normal meals usually served. While this appears to be useful information, many parents' schedules change frequently especially in family day care environments. Currently, if a meal is claimed for a child that differs from the enrollment form's "normal hours in care" or "normal meals", possibly due to a schedule change, reimbursement for this child's meals may not be reimbursed. It will improve the program by eliminating the requirement of listing normal days and hours in care. This information is not helpful, and this change will make the enrollment process for parents more streamlined. In addition, we would recommend that the form be collected on a two to three-year cycle rather than annually reducing paperwork by at least 50%.

- 1.3 Requiring state agencies to allow electronic collection of income eligibility and enrollment data for institutions and providers, including but not limited to USDA's own web-based prototype app, would increase program efficiency without additional cost.

- 1.4 State Agencies have the option of determining payment rates for child care centers: actual, blended or percentages. Federal regulation states that the state agency shall assign these rates of reimbursement, "not less frequently than annually". This has resulted in some state agencies requiring facilities to reevaluate these rates as often as

monthly, creating additional burdensome paperwork and costly monitoring of the process. We recommend that rate determination only be required annually unless there are significant enrollment changes warranting a reevaluation. By eliminating the words "not less frequently than", states will only be able to set the rates annually. This change would increase program efficiency without additional cost.

- 1.5 Program violations can result in a Serious Deficiency which, in some cases, can be simple technical issue and may not affect program integrity. For instance, if a provider doesn't have a meat thermometer onsite and in use while cooking, a corrective action would be issued. If at any time in the future, it happens again, that provider could potentially be placed on serious deficiency due to the current regulation which states that the frequency and severity of a corrective action could result in a serious deficiency for even minor offenses. There is no guideline which defines frequency and severity. It would improve the program without cost, to allow a determination of serious deficiency to be appealable by all CACFP participants.

We would request established and thorough guidelines in determining when there is a serious deficiency, including what measures automatically result in a serious deficiency and how differentiation is being made between a reasonable margin of error and systematic or intentional noncompliance. The serious deficiency process, as it is written, provides no opportunity for due process to participants declared seriously deficient but only for those terminated from the program.

- 1.6 A significant program improvement with no cost would be to require USDA, as part of the Management Evaluations of State Agencies, to identify, review and evaluate the efficacy of additional state requirements for participation and administration of the CACFP. This would include a regulatory impact analysis or a cost benefit analysis to support the need for any proposed additional requirements above and beyond federal requirements. Additional state requirements should be compiled for each state and given to Sponsors and independent sites of that state.

2. Please elaborate or provide examples of where there is currently duplication, or examples of potential streamlining of administrative redundancies, that could allow your organization to better serve or provide access to people in rural areas, without sacrificing program integrity.

NCA Response:

- 2.1 Micro purchasing procurement rules require that the spending be spread among multiple vendors. Since access to food in rural areas is often limited and requires sites to drive long distances to comply with procurement rules, this can be difficult, and potentially costly.
- 2.2 Institutions and facilities that serve low income families typically serve the same geographic area and their eligibility status rarely changes especially in rural areas. Currently, for profit-centers' eligibility determinations must be verified each month. There is a significant opportunity to streamline this administrative redundancy by changing the eligibility determination to be required every six months instead of monthly.

**Senator Debbie Stabenow**

1. We know that CACFP only reimburses for two meals and one snack. Your testimony mentioned a daycare provider who provides non-reimbursed meals out of her own pocket because kids are in her care for such long hours. How common is this experience for CACFP providers?

NCA Response:

- 1.1 Typically, child care home providers open early to allow parents to get to work on time and are often open until at least 6:00 P.M. Children are often in care 8 hours or more a day. Therefore, providers are feeding children more than the 2 meals and a snack or 2 snacks and a meal that the CACFP allows. Young children need to eat frequently to refuel and support their growing bodies.

Providers are encouraged to claim all meals and snacks served as this becomes a viable business management tool. Because some state agencies actively discourage providers from this practice, we do not have accurate specific national data available. We do know that it is a very common practice and happens more often than not.

**Senate Committee on Agriculture, Nutrition, & Forestry**  
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April 10, 2019  
Questions for the Record  
**Dr. Olanrewaju Falusi**

**Chairman Pat Roberts**

1. You provide an interesting perspective to connecting WIC clinics with pediatricians. Please provide some examples of WIC clinics co-located within medical clinics, and how those function within current WIC regulations. Please share any unique aspects of this strategy when applied to rural areas. Please share any data or evidence of efficiencies or cost-savings that co-locations provided to USDA, the state or participants.

My clinic, part of Children's National Health System, has WIC co-located with our medical clinic. This allows me to walk a family down the hall to our WIC clinic rather than having them take another day off work to go to a separate site. Co-location also allows for collaboration and communication between our health care providers and WIC staff; we can be sure that we have consistent messaging around breastfeeding promotion and healthy food and beverage consumption. It also helps to avoid potentially duplicative medical procedures such as the drawing of blood for testing.

Co-location is especially important in rural areas, as it may be difficult for families to secure time off and transportation to visit both the doctor's office and the WIC clinic in separate visits. When the WIC clinic is on-site, it is much easier for the family to visit both WIC and the physician in the same visit.

Other examples of co-located WIC clinics are the Seattle Children's Odessa Brown Children's Clinic in Washington state, the Denver Health clinics in Colorado, Salud Medical Center in Oregon, Hamilton Health Center in Harrisburg, Pennsylvania and the Morrisania Diagnostic & Treatment Center in New York. A survey in 2000 by Emory University found that between 20 to 25% of local WIC sites were co-located with primary health care.<sup>1</sup> By federal law, organizations receiving USDA support to deliver WIC services must have nonprofit status.

2. Please provide other examples of potential program improvements or flexibilities that would allow you or your organization to better serve or provide access to people in rural areas.

One of the most effective investments Congress can make during the prenatal to school-aged period is to support WIC. In addition to promoting the co-location of WIC with pediatric clinics, we recommend eliminating recertification of infants at age 1. We believe this change could have a meaningful impact on the attrition rate within WIC.

In addition to reducing barriers to enrollment such as recertification requirements, we support streamlining eligibility for WIC with other programs that serve low-income families.

**Senator Debbie Stabenow**

1. As the updated, science-based WIC food package and new nutrition standards for school meals have been implemented over the last several years, what observations have you made about how these changes have impacted your patients?

Since the 2009 update to the WIC food package and the school meal standards from the *Healthy, Hunger Free Kids Act* were implemented, I've noticed improved eating patterns in my patients. They are eating more fruits, vegetables, whole grains and other nutrient-rich options.

My observations reflect the findings of recent research. A study published in *Pediatrics* found that science-based changes made to the WIC food package in 2009 may have helped to reverse the rapid increase in obesity prevalence among WIC participants observed before the food package change.<sup>ii</sup> Participants purchased and consumed less fruit juice, refined grains, grain-based desserts, and sugar-sweetened beverages while increasing purchases and consumption of fruits, vegetables, and whole grains. This dietary pattern has been associated with less weight gain in both children and adults. These findings underscore the importance of ensuring that the nutrition content of federal programs is determined by nutrition scientists and medical professionals.

Recent studies concerning school meals have found that children are now eating more fruits and vegetables and discarding less of their lunches under the *Healthy, Hunger Free Kids Act* standards.<sup>iii</sup> For some children, the only food they eat each day comes from the federal school meals program. They rely on these meals to give them the right balance of fruits, vegetables and whole grains so they can concentrate and succeed in school. Healthy eating habits start early and schools have an important role to play. In fact, schools have been strong partners in this effort; nearly 100% of schools successfully implemented the 2012 nutritional standards for fruits and vegetables, whole grains, and lower sodium. Parents, teachers and students themselves are experiencing healthier eating habits because of the higher nutrition standards for foods sold in schools.

**Senator Amy Klobuchar**

1. In the United States, eating disorders are more common than breast cancer or Alzheimer's. That's why I worked to pass the Anna Westin Act, which will ensure that people suffering from eating disorders get the treatment they need. Research has suggested that the recent focus on obesity prevention needs to also take into account the needs of youth at risk of developing an eating disorder.

- a. From your perspectives, can more be done to protect youth at risk for eating disorders?

The pediatrician often is the first professional consulted by a parent or the school when there is a concern about a possible eating disorder (ED). Early diagnosis and intervention are associated with improved outcome. EDs are best evaluated and managed by a multidisciplinary health care team, with the pediatrician as an important member of that team. A thorough physical examination and review of systems can help to identify any underlying medical and psychiatric causes for weight loss.

The prevalence of childhood obesity has increased dramatically over the past few decades in the United States and other countries, and obesity during adolescence is associated with significant medical morbidity during adulthood. EDs are the third most common chronic condition in adolescents, after obesity and asthma. Most adolescents who develop an ED did not have obesity previously, but some adolescents may misinterpret what “healthy eating” is and engage in unhealthy behaviors, such as skipping meals or using fad diets in an attempt to “be healthier,” the result of which could be the development of an ED. Messages from pediatricians addressing obesity and reviewing constructive ways to manage weight can be safely and supportively incorporated into health care visits. Avoiding certain weight-based language and using motivational interviewing (MI) techniques may improve communication and promote successful outcomes when providing weight-management counseling.

MI is defined as “a collaborative, goal-oriented style of communication with particular attention to the language of change. It is designed to strengthen personal motivation for and commitment to a specific goal by eliciting and exploring the person’s own reasons for change within an atmosphere of acceptance and compassion.” A study conducted through the AAP Pediatric Research in Office Settings (PROS) network assessed the effect of MI delivered by pediatricians and found that pediatricians and dietitians who used MI to counsel families with overweight children were successful in reducing children’s BMI percentile by 3.1 more points than a control group in which MI was not used. Pediatricians can successfully facilitate their patients’ lifestyle behavior changes. Concerns from pediatricians and parents that obesity counseling can lead to an ED can be addressed by understanding the effectiveness of family-centered MI to promote healthy behaviors.

Obesity prevention and treatment, if conducted correctly, does not predispose to EDs. On the contrary, randomized controlled trials of obesity prevention programs have shown a reduction in the use of self-induced vomiting or diet pill use to control weight and a decrease in concerns about weight in the intervention groups. Family involvement in the treatment of both adolescent obesity and EDs has been

determined to be more effective than an adolescent-only focus. An integrated approach to the prevention of obesity and EDs focuses less on weight and more on healthy family-based lifestyle modification that can be sustained.

Pediatricians can encourage parents to be healthy role models and supportively manage the food environment by creating easy accessibility to healthy foods (eg, fruits, vegetables, whole grains, beans and other legumes, and water) and by limiting the availability of sweetened beverages, including those containing artificial sweeteners, and other foods containing refined carbohydrates. Discussions between pediatricians and parents about increasing physical activity and limiting the amount of total entertainment screen time to less than 2 hours/day are important and may lead to changes in family behavior. Another area of prevention is avoiding the presence of a television in the teenager's bedroom, because having a television in the room predicts significantly less physical activity as well as poorer dietary intakes compared with not having a television in the room. Other evidence-based approaches encourage parents to include more family meals, home-prepared meals, and meals with less distractions as well as fewer discussions about weight and about dieting. Understanding that poor body image can lead to an ED, parents should avoid comments about body weight and discourage dieting efforts that may inadvertently result in EDs and body dissatisfaction.<sup>iv</sup>

- b. Would incorporating eating disorder prevention and other long-term health approaches in school wellness programs better promote student health?

Efforts to prevent eating disorders can take place both in practice and community settings, such as schools. A variety of successful programs for preventing eating pathology have been developed for various settings. The largest effect sizes were seen in programs targeted at high-risk populations, in programs that were interactive rather than didactic, and in programs aimed at older adolescents. Content varied even in the most successful programs, which suggests that a variety of approaches may be effective. Multisession programs were more effective than single-session programs, and there has even been some concern that single-session programs may be counterproductive.

<sup>i</sup> <http://web1.sph.emory.edu/wcc/wicmc/rgfull.pdf>

<sup>ii</sup> Daepf et al. WIC Food Package Changes: Trends in Childhood Obesity Prevalence. *Pediatrics*. 2019; 143(5): e20182841.

<sup>iii</sup> Schwartz MB, Henderson KE, Read M, Danna N, Ickovics JR. New School Meal Regulations Increase Fruit Consumption and Do Not Increase Total Plate Waste. *Child Obes*. 2015;11:242-7. doi:10.1089/chi.2015.0019; Cohen JF, Richardson S, Parker E, Catalano PJ, Rimm EB. Impact of the New U.S. Department of Agriculture School Meal Standards on Food Selection, Consumption, and Waste. *Am J Prev Med*. 2014;46:388-94. doi:10.1016/j.amepre.2013.11.013.

<sup>iv</sup> Golden NH, et al. Preventing Obesity and Eating Disorders in Adolescents. *Pediatrics*. 2016; 138 (3): e20161649.