

Priorities to Improve and Strengthen Child Nutrition Programs

The upcoming child nutrition reauthorization process presents an important opportunity for Congress to reduce childhood hunger, decrease childhood overweight and obesity, improve child nutrition and wellness, enhance child development and school readiness, and support academic achievement.

The School Breakfast Program and National School Lunch Program provide funding to school districts to serve nutritious breakfasts, lunches, and afterschool snacks. These programs help reduce hunger, improve health, and ensure that students across the country are able to focus and learn throughout the school day. Yet, there are shortfalls: The School Breakfast Program serves just over half of the low-income children who participate in school lunch; too many children who need free or reduced-price school meals are not certified to receive them; and schools are struggling to respond to school meals debt.

The Summer Food Service Program and the Afterschool Nutrition Programs help to ensure that children are not hungry during the long summer vacation or after school. The healthy meals and snacks that these programs provide help to draw children into educational and enrichment activities that keep children safe and learning while their parents are working. Too many children are missing out on both programs. Only 2.9 million children received a summer lunch on an average day in July 2018 — that's only 1 in 7 of the low-income children participating in school lunch during the school year. Afterschool suppers served only 1.2 million children on an average day in October 2017.

The Child and Adult Care Food Program (CACFP) provides funding to serve healthy meals and snacks in Head Start, child care centers, family child care homes, and afterschool programs. This program supports good nutrition, as well as high-quality and affordable child care, which helps children develop fully and enter and attend school ready to learn while their parents are at work. Unfortunately, under the current rules, CACFP meals and snacks are out of reach for millions of young children in child care.

The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) provides healthy food, nutrition counseling, and referrals to services for low-income nutritionally at-risk pregnant and postpartum mothers, infants, and young children.

The Food Research & Action Center (FRAC) urges Congress to enact a child nutrition bill that supports and strengthens program access and participation by underserved children and communities; ensures nutrition quality; and simplifies program administration and operation. The reauthorization should maintain and build upon the critical gains made in the last reauthorization. In order to achieve these goals, FRAC asks Congress to make the following improvements to the child nutrition programs.

School Meals Priorities

Increase the number of low-income children who are directly certified to receive free school meals without an application. For example, expanding Medicaid “direct certification” to all states, and allowing children receiving Supplemental Security Income benefits, children living in households that are receiving guardianship or adoption assistance or LIHEAP, and children who are placed in kinship or informal care (an important alternative for placing children in foster care) to qualify automatically for free school meals. This will ensure that the low-income children who need school meals most will be able to access them. It also will reduce administrative work for school districts and improve program integrity within the school nutrition programs by relying on verified eligibility for other programs and reducing the number of school meals applications that schools must collect and process.

Invest in the Community Eligibility Provision to increase the number of high-poverty schools that can participate. Schools, groups of schools, and school districts with about two-thirds of their student body eligible for free school meals are eligible to implement community eligibility

and offer breakfast and lunch free to all students. The reimbursement is based on counting a subset of low-income children within the school: those who are certified to receive free school meals without an application because their household participates in the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), the Food Distribution Program for Indian Reservations (FDPIR), or Medicaid (in some states), or are homeless, migrant, in foster care, or enrolled in Head Start. The school's percentage of such students, called the Identified Student Percentage, is multiplied by 1.6 to determine the percentage of meals reimbursed at the free rate, and the rest are reimbursed at the significantly lower paid rate.

Increasing the percentage to 1.8 percent would make it financially viable for more high-poverty schools to participate, compounding the gains of this initiative. Community eligibility reduces red tape and administrative costs, improves economies of scale, increases participation in school meals, which is linked to improved academic achievement and health, and eliminates school meals debt.

Move to free school meals for all by piloting the Community Eligibility Provision statewide. Community eligibility has highlighted the academic, health, administrative, and financial value of offering school breakfast and lunch at no charge to all students. Allowing a handful of states to develop different statewide approaches to implementing community eligibility would enable children in those states to benefit from fully participating in school meals, and schools to benefit from the maximum amounts of administrative and financial savings. An evaluation of this approach would provide important data to guide future investments in school meals.

Direct the U.S. Department of Agriculture (USDA) to set federal policy for school meals debt that protects students. This policy should ensure that children are not embarrassed or stigmatized when their family owes school lunch money; that school districts direct communications about school meals debt to parents or guardians, not children; and that the school districts take steps to certify students eligible for free or reduced-price school meals if their families start to accrue school meals debt.

Allow school districts to retroactively claim and receive reimbursements for school meals served to low-income students who are certified for free or reduced-price

school meals later in the school year, starting with the first day of the school year. This would help the school district overcome unpaid school meals fees accrued by families eligible for free or reduced-price school meals, as well as address the debt that the low-income student accrued prior to being certified for subsidized school meals.

Provide commodities for the School Breakfast Program. The 2019 Fiscal Year Agriculture Appropriations bill provided \$20 million to support breakfast commodities. The reauthorization should build on that investment to support the healthfulness and financial viability of the School Breakfast Program even further.

Create a new project to increase charter school participation in the child nutrition programs, including school meals, afterschool meals, and summer food. Many charter schools serve large numbers of low-income children but do not participate in the child nutrition programs, leaving parents to fill a nutritional void that is rarely a problem when their children attend traditional public schools (particularly public schools serving large numbers of low-income students). The project could create a special task force that includes USDA, the U.S. Department of Education, and national education and school nutrition program experts to develop a plan for increasing the participation of charter schools in the child nutrition programs.

Protect the nutrition standards for school meals and other food sold in school. Healthy school meals are especially important for low-income children who are vulnerable to obesity and poor nutrition because of risk factors associated with poverty, including stretched family resources, limited access to healthy and affordable foods, fewer opportunities for physical activity, high levels of stress, greater exposure to obesity-related marketing, and limited access to health care. Given all of these challenges, healthy school meals, limiting unhealthy “competitive foods” in schools, and ensuring a healthy school mealtime environment play an important role in improving the health of low-income children. Research shows that the new nutrition standards (prior to the most recent rollbacks by USDA) have had a positive impact on the school nutrition environment, as well as student food selection and consumption, especially for fruits and vegetables.

Out-of-School Time Priorities

Improve the area eligibility test to allow summer and afterschool meal sites to participate if 40 percent of the children in the area are eligible for free or reduced-price meals. Currently, a summer meal site qualifies for federal funding if 50 percent or more of children in the area, as defined by school or census data, qualify for free or reduced-price school meals. This threshold keeps many communities with significant numbers of low-income children, but not a high enough concentration of poverty, from participating. This is particularly true in rural areas. In addition, the 50 percent test is inconsistent with the rules for federally funded summer and afterschool meals programs, such as the 21st Century Community Learning Centers programs and Title I, whose funding occurs when 40 percent or more of children in the area qualify for free or reduced-price school meals. These important education programs should all be able to provide summer meals.

Allow schools, local government agencies, and private nonprofit organizations to feed children year-round seamlessly through the federal nutrition programs.

Currently, Summer Food Service Program sponsors and schools must apply to and operate CACFP in order to provide children — often the same children — suppers after school during the school year. This creates duplicative paperwork and confusing administrative rules that discourage participation. Sponsors should be able to feed children year-round through the Summer Food Service Program, and schools should be able to provide meals after school, on weekends, and during school holidays through the National School Lunch Program.

Expand the Summer Electronic Benefit Transfer (Summer EBT) Card Initiative. Summer EBT provides low-income families with children a monthly benefit on a debit card to purchase food during the summer months. A [2016 report on Summer EBT](#) found that it reduced the most severe type of food insecurity (very low food security) by one-third, and food insecurity by one-fifth. Summer EBT is a valuable complement to the Summer Nutrition Programs, and offers an important opportunity to reduce food insecurity for low-income families, especially in rural or other areas with limited access to summer meals. Summer EBT benefits provided through a SNAP model were redeemed at a greater rate, and there was a lower administrative cost than

providing the benefits through a WIC model. Child Nutrition Reauthorization offers the opportunity to expand Summer EBT significantly and make it permanent. Reauthorization should expand Summer EBT through the more effective SNAP model. Summer EBT through WIC should be allowed for Tribal Nations, as well as for states that have previously operated under the WIC model.

Provide funding for summer transportation grants to fund innovative approaches and mobile meal trucks.

Transportation is one of the biggest barriers to participation in summer meals, and these grants will increase low-income children's access to summer meals in rural and other underserved areas.

Allow all summer meal sites to serve a third meal. Many summer meal sites provide child care to working parents and run all day, but most sites are only allowed federal funds for a maximum of two meals per day. This leaves children without enough nutrition to get through the day or forces sites to use program dollars for food.

Early Childhood Preschool Priorities

Allow child care centers and homes the option of serving an additional meal service — this typically would be a snack or supper — as was previously allowed. National child care standards are based on the best nutrition and child development science. These standards include recommendations and benchmarks from the American Academy of Pediatrics, American Public Health Association, National Resource Center for Health and Safety in Child Care and Early Education, and the Academy of Nutrition and Dietetics. The standards specify that young children need to eat small, healthy meals and snacks on a regular basis throughout the day. Many children are in care for more than eight hours per day and they rely on child care providers to meet a majority of their nutritional needs. Previously, child care providers could receive federal funding for up to three meals and one snack. In 1996, Congress cut out one meal service to achieve budget savings. This penny-wise and pound-foolish step harms children's nutrition and health and weakens child care. The full complement of meals should be restored to better meet the nutritional needs of young children.

Allow annual eligibility for proprietary (for-profit) child care centers. Proprietary child care centers are eligible to participate in CACFP if at least 25 percent of the children they serve are low-income. Unfortunately, USDA requires these child care centers to document institutional eligibility every month rather than the annual eligibility allowed for other centers and homes. This creates unnecessary and substantial paperwork and other administrative burdens. Many of these child care centers are small, independent operations that provide much-needed care and afterschool programs to low-income children in underserved areas. Extending annual eligibility to these child care centers would streamline program operations and is consistent with the recommendations of the USDA's Paperwork Reduction Work Group's [report](#) to Congress.

Increase CACFP reimbursements to stem participation declines and improve nutrition. Cost is one of the most commonly cited barriers to providing healthier foods. Increasing the availability and consumption of fruits and vegetables, whole grains, and lower-fat dairy products among young children in child care is essential to improving development, promoting health, and preventing obesity during early childhood and beyond. This effort needs to be supported by adequate meal reimbursements. Higher reimbursements will attract more child care centers and family child care homes, assuring that more children participate in CACFP.

Use the Consumer Price Index for Food Away From Home as the cost of living adjustment for family child care home CACFP reimbursement rates. For the last several years (2015–2019), the CACFP reimbursement rates for family child care providers have stagnated while rates for centers have continued to grow. The Consumer Price Index for Food at Home, which is the cost of living adjustment used for CACFP homes, has not kept up with the cost of providing CACFP meals. The Consumer Price Index for Food Away From Home, which is the cost of living adjustment used for child care centers, has been a better indicator of the costs for homes and centers.

Reduce the CACFP area eligibility test from 50 percent to 40 percent to streamline access to healthy meals for young children in child care. Area eligibility, the most successful and inclusive CACFP eligibility mechanism, allows family child care homes in low-income areas to receive automatically the highest CACFP reimbursement rates.

This “area eligibility” test has proven extremely effective because it substantially decreases the paperwork for providers and families by eliminating the need to document income for each household.

Currently, family child care homes only qualify for area eligibility in areas with 50 percent or more low-income children (as defined by local census data or the percentage of children who are eligible to receive free and reduced-price school meals). This threshold is too high to reach many communities with struggling families. This is especially true in rural and suburban areas, which typically do not have the same pattern of concentrated poverty as urban areas.

Reducing the area eligibility test to a 40 percent threshold would help many child care providers serving low-income children become eligible for the higher reimbursement, which would make it more likely that those providers would participate in CACFP. As a result, many more children in need would receive healthy CACFP meals and snacks. It is common for providers to forgo offering lower-reimbursed meals and let children rely on food sent from home, but research has shown that food brought from home is far less nutritious than the meals and snacks that children receive through CACFP.

Streamline program requirements, reduce paperwork, and maximize technology to improve program access. There are a variety of sound strategies to broaden CACFP's reach to more low-income families. These include streamlining program operations, increasing flexibility, and maximizing technology and innovation to reduce parents' paperwork. The following recommendations are consistent with the aforementioned USDA Paperwork Reduction Work Group report.

- Maximize the use of technology to streamline and consolidate paperwork and recordkeeping requirements for low-income parents and program operators through the following no-cost provisions:
 - Modernize applications, eliminate enrollment forms, and expand the use of direct certification to all states;
 - Require states to accept digital forms, digitized and electronic signatures, and electronic records as documentation;
 - Allow the use of electronic data collection systems containing all of the required federal CACFP standards;

- Eliminate unnecessary additional state-specific documentation and recordkeeping requirements for parents, providers, and sponsors; and
- Encourage the adoption of generally accepted technologies from other domains into CACFP participation and administration.
- Authorize a representative work group to continue to guide USDA's CACFP paperwork reduction efforts, including maximizing the use of technology.
- Simplify program paperwork for low-income parents by creating a Community Eligibility Provision for child care centers participating in CACFP.

Enhance administrative reimbursements to support CACFP-sponsoring organizations' administrative efforts to implement the new, healthier CACFP meal pattern, and to sustain the participation of family childcare providers. CACFP sponsors, which are nonprofit community-based organizations, receive a monthly reimbursement to cover the cost of supporting the participation of family child care homes in CACFP. Sponsors' monthly administrative reimbursements should be brought to the level necessary to cover the costs of administering the new, healthier CACFP meal pattern. These costs include additional ongoing training and oversight, monitoring visits, extra time helping low-income providers overcome literacy and language issues, and transportation costs to reach rural providers. Even before the new improvements in the CACFP meal pattern and nutrition education were introduced, many sponsors were unable to make ends meet due to high program costs and the loss of economies of scale as providers dropped out of the program, which has led to a 28 percent decrease in the number of sponsors in the last dozen years.

Continue funding the USDA's Team Nutrition CACFP nutrition education and program efforts. These funds will be crucial to supporting the continuation of USDA's important role in providing valuable and innovative materials, training, technical assistance and support to State agencies and program operators — all of which are critical to the success of the new CACFP healthier meal pattern and nutrition standards. There is room for improvement in nutrition knowledge among child care providers, and CACFP training and materials are an important step in promoting healthy eating among preschool children.

WIC Priorities

Extend WIC certification periods to two years and enrollment for children until their sixth birthday. Extending WIC certification to two years will support the health of mothers and children with much-needed WIC benefits, including healthy food, nutrition counseling, and referrals to services. Mothers and children who are eligible for the extension of WIC are likely to struggle with, or are already struggling with, food insecurity and poverty — two conditions that make it difficult to maintain good health, nutrition, and overall well-being. The extension of certification periods and eligibility will help to retain families in WIC.

Maintain the scientific integrity of the WIC food package process as USDA undertakes the congressionally mandated 10-year review cycle revision. Maintaining the scientific integrity of the food package revision process is critical to WIC's success. The WIC food packages were revised in 2007 to align the authorized foods with the latest nutrition science. Research shows that the revised WIC food packages have favorable impacts on dietary intake, breastfeeding outcomes, and obesity rates. In addition, studies suggest an important role for the WIC package in improving neighborhood food environments, which benefits WIC participants and nonparticipants. USDA should be allowed to complete the current science-based process of updating the WIC food packages with congressional support.

Fully fund USDA WIC research, including research and pilots focused on expanding the reach of WIC in underserved groups and communities. USDA produces valuable ongoing research and reports on WIC characteristics, coverage, nutrition education, program management, and market impacts. Fully funding WIC research will support ongoing research and reports, as well as special grant projects. USDA awards grants on a competitive basis for relevant research and pilots, including

- Grants for State WIC agency projects of regional or national significance that are designed to improve the quality of nutrition services; and
- Grants to researchers for the development of innovative solutions, such as the recent funding of a Participant Research Innovation Laboratory, which will oversee pilots for enhancing customer service.

For more information, visit FRAC.org.