Summary of the 2009 Reauthorization of the Child Nutrition and WIC Programs Listening Sessions July – September 2008

No one should go hungry in America. To this end, the United States Department of Agriculture's (USDA) 15 nutrition assistance programs are the first line of our Nation's defense against hunger. Through the Food and Nutrition Service, the USDA provides children and low-income families access to food, a more healthful diet, and nutrition education. In preparation for the 2009 Reauthorization of the Child Nutrition Programs, the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), and the WIC Farmers' Market Nutrition Program (FMNP), it is important to consider the accomplishments and challenges of these programs and identify and build upon the features of their success.

In this spirit, USDA invited the public to participate in a broad-based dialogue about the future of the Child Nutrition and WIC programs. A series of listening sessions held in cities across the country during the summer of 2008 gave hundreds of people the opportunity to meet face-to-face with senior USDA officials and provide their input and assessment of these programs. The specific programs that were addressed included: WIC, National School Lunch Program, School Breakfast Program, Child and Adult Care Food Program, Summer Food Service Program, FMNP, Fresh Fruit and Vegetable Program, and the Special Milk Program.

The Listening Sessions were intended to help the Department better understand the needs and concerns of the program participants and partners at the State and local levels. This summary presents the major themes of the testimony presented by over 320 participants. Speakers included State and local agency officials, school district representatives, professional organizations, advocacy groups, program participants, and interested citizens. The comments summarized in this document represent the views of these participants. They should not be interpreted as USDA policies or proposals.

2008 Listening Sessions

The following is the number of people that provided oral and/or written comments at each of the Regional Office Listening Sessions:

<u>Date</u>	Location	Commenters
June 10	Boston	50
July 15	Austin	51
August 6	Baltimore	47
August 6	San Francisco	33
August 20	Atlanta	42
September 10	Chicago	43
September 11	Denver	56

OVERVIEW

This document describes the comments made by a wide variety of individuals and organizations who participated in the listening sessions. It is meant to serve as a summary of the full range of views expressed at these sessions. As such, USDA has not screened these reported comments for accuracy or feasibility; for example, some may advocate for changes that are already allowable within the current program structure.

Funding. Many of the commenters called for increased funding for Child Nutrition Programs, including more funding for: meal service and administrative reimbursements, fresh fruit and vegetables, food service equipment assistance, outreach, research, transportation, staff training, and nutrition education.

Nutrition. Adequate nutrition and a comprehensive approach to the problem of childhood obesity were also the focus of many comments pertaining to the programs overall. Commenters noted that Child Nutrition Programs need to have meal standards that will improve health. Many commenters suggested establishing, and regularly updating, uniform meal patterns based on the Dietary Guidelines. These meal patterns should also include more fruits and vegetables, whole grains, and low-fat dairy products, while limiting or banning foods with little nutritional value. Many commenters also asked that the USDA require more plant-based vegetarian menus and increased vegetarian options.

GENERAL CHILD NUTRITION PROGRAM COMMENTS

Other comments that referred to the programs overall or were applicable to more than one program included:

Strengthening Program Management and Improving Nutrition

- Allow three reimbursable meals, plus snacks
- Encourage/require the purchase of locally grown foods; use local vendors
- Develop one application (electronic) for all Child Nutrition Programs
- Make programs more uniform across the country and within schools
- Milk
 - o Provide a clear definition of a milk substitute
 - o Allow milk alternatives, such as soy milk, to be reimbursable
 - Eliminate the medical note requirement for students that do not want or cannot drink milk
 - o Ensure dairy products remain part of the school meals
 - Offer more flavored varieties of milk, which have been shown to increase milk consumption and contain fewer calories compared to other beverages
 - o All milk should be reduced-fat
- Increase the nutritional value of commodities
- Continue to use pork products because they are an excellent source of protein, as well as select vitamins and minerals

- Incrementally decrease sodium requirements for foods so that children can tolerate the change in taste
- Tie the MyPyramid guidance to food standards; color code foods to distinguish regular vegetables from starchy vegetables and provide recommended portions for each color code
- Expand to include reimbursements for take-home food programs
- Simplify/streamline/reduce paperwork and reporting requirements
- Establish national nutrition standards for competitive foods
- Scale back monitoring mechanisms
- Adjust reimbursement rates semiannually
- Increase funding so children can receive second helpings
- Provide funding for non-food assistance grants so that schools can purchase equipment, such as refrigerators and salad bars to enable schools to serve more fruits and vegetables

- Eliminate the social security number requirement from applications
- Eliminate means testing
- Establish consistent criteria for site eligibility across programs, e.g., the At-Risk Afterschool Program
- Increase outreach
- Adjust income eligibility guidelines for high-cost areas to ensure working families earning minimum wage qualify
- Make all children who participate in the WIC program categorically eligible for other child nutrition programs
- Expand child nutrition programs on weekends and after school

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- Invest in online enrollment, eligibility, contract renewal and claim filing
- Develop online applications with electronic signatures.

PROGRAM-SPECIFIC COMMENTS

Listed below are each of the programs for which comments were solicited. Common themes for each program are noted in the opening paragraph, followed by additional specific comments.

National School Lunch Program (NSLP)

Multiple speakers requested an increase in reimbursement rates due to the increased costs of fuel and food. Many of the commenters also suggested expanding the fruit and vegetable requirements and increasing funding to allow schools to offer more fruits and vegetables. There also was support for expanding the farm-to-school programs and relying on more locally produced foods. Other specific comments included:

Strengthening Program Management and Improving Nutrition

- Require States implementing more stringent nutrition standards than Federal requirements to provide funding for the cost of implementing the standards
- Reduce calorie minimum required for meals to reflect the current sedentary habits of children
- Provide mandatory funding for Team Nutrition
- Regularly update wellness and nutrition policies, include more resources to develop better wellness policies, critically evaluate policies, and make schools more accountable to their policies
- Establish stronger requirements for nutrition education and obesity prevention in schools
- Dietary Guidelines
 - o Accelerate the timeline for implementation
 - o Decrease calorie and protein requirements for children
- Provide extra meals or portions on Monday and Friday to ensure that children are not hungry on weekends
- Require non-irradiated meat or labels to indicate irradiated meats if served
- Allow schools to choose organic and hormone-free milk and non-irradiated meat, at no extra cost, and without additional paperwork requirements
- Prohibit branding, marketing, and advertising towards children in schools
- Provide more training and staff development with more focus on food safety risks
- Combine Enhanced Food Based and Traditional Food Based Menu Planning
- Require that Directors of School Nutrition Programs at the district level are certified Registered Dieticians, Dietetic Technicians, or School Nutrition Association School Nutrition Specialists
- Improve working conditions for school food service personnel (health insurance, pay)
- Provide gluten-free meals for children with celiac disease
- Under Section 504 of the Rehabilitation Act and under the Americans with Disabilities
 Act children with disabilities and allergies cannot be excluded from participating in
 Federal programs, including school lunch programs, therefore NSLP must ensure that
 their needs are met
- Address the persistent problem with variance between the Federal fiscal year and school year (school year begins July 1); authorize borrowing from Commodity Credit Corporation funds until the new school year begins
- Provide universal free meals or funding for unpaid meals, regardless of the pay category
- Fund a public awareness campaign to educate the public about the positive benefits of the NSLP and rebut negative stories in the press
- Simplify Hazard Analysis and Critical Control Point (HACCP) record keeping
- Ensure that campuses are visited by health departments
- Adjust State Administrative Expense fund (SAE) formula to include the value of commodities distributed throughout the States
- Revisit the Commodity Letter of Credit programs and provide to all districts

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- Eliminate the reduced-price category
- Use the Supplemental Nutrition Assistance Program (SNAP), formerly the Food Stamp Program, outreach as a model for Special Nutrition Programs' outreach
- Adjust income eligibility guidelines for high cost areas
- Provide easier access to Afterschool Program in NSLP and more funds
- Increase funding and accessibility for farm-to-school programs
- Allow the use of Medicaid data to directly certify students
- Strictly enforce the overt identification requirement
- Provide universal meals for low-income areas
- Establish a base year for meal eligibility and use it for two years
- Encourage school administrators to provide more reasonable lunch times; increase length of lunch periods

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- Improve direct certification for school meals with state matching systems
- Introduce on-line meal applications
- Provide funding for food service equipment and point-of-service technology (to avoid overt identification)
- Encourage data sharing between FNS programs
- Increase funding for enhanced technology for commodity distribution

School Breakfast Program (SBP)

One of the most frequent comments regarding the SBP involved providing commodity support for breakfasts. Other comments included:

Strengthening Program Management and Improving Nutrition

- Provide grants to schools to start or expand school breakfast
- Provide funding to purchase equipment to facilitate breakfast service
- Limit sugars in breakfast cereals and provide more whole grains

Ensuring All Eligible People Have Access to Program Benefits

- Establish a universal school breakfast or require schools with 50 percent or more of their students eligible for free or reduced-price meals to serve breakfast
- Eliminate the reduced-price category

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Fresh Fruit and Vegetable Program (FFVP)

Several commenters requested increased funding for equipment to help prepare and store produce. Funding also was requested for the Department of Defense Fresh Fruit and Vegetable Program and procurement training. Other comments included:

Strengthening Program Management and Improving Nutrition

- Increase consumption of fruits and vegetables in all forms, including canned, frozen, and dried
- Monitor the program to ensure that the expected behavioral and nutritional changes are taking place
- Expand commodities for fresh cut fruits and vegetables
- Work with individuals in the private sector to find ways to deliver fresh produce
- Expand the rule to allow schools to receive cash for local products

Ensuring All Eligible People Have Access to Program Benefits

- Increase funding for transportation costs for all and particularly for those in rural areas who incur an extra charge for delivery
- Increase access to the program to more than 25 schools per State

Child and Adult Care Food Program (CACFP)

Several speakers requested that CACFP allow reimbursement for a third meal for sites open more than 8 or 10 hours daily. There also were several comments directed at the integrity rules with commenters requesting the elimination or simplification of the block-claiming and 5-day reconciliation requirements. Other comments included:

Strengthening Program Management and Improving Nutrition

- Improve nutrition education to program operators; offer nutrition education materials/training for providers, children, and families in different languages and at lowliteracy levels
- Restore requirement for State agencies to issue administrative advances
- Increase rate for snacks in at-risk programs based on the age of the children
- Discourage State agencies from imposing stricter requirements
- Mandate and enforce regional compliance with Federal requirements
- Require USDA to conduct monitoring rather than facilitating annual audits from each State agency for a multi-state sponsor
- Develop a procedure for approving new food items
- Create competitive grant program for sponsors to operate CACFP
- Provide reimbursement for introduction visits and training
- Educate rural providers on how to grow produce

- Make afterschool snack application approvals retroactive to when the program started
- Lengthen time of provider eligibility to one year

- Eliminate the two-tier system and go back to a single reimbursement rate
- Expand pilot for at-risk program suppers; make reimbursable suppers available to low-income children up to age 18
- Allow afterschool programs to feed children over 13 years of age
- Establish area eligibility for CACFP similar to SFSP to reduce paperwork burden associated with individually means testing each family
- Reimburse for in-home children living in day care homes, even when no outside children are present

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- Invest in online solutions for enrollment, eligibility, annual contract renewal, and claim filing
- Provide Web site links to State-specific forms, training materials, and other resources for sponsors
- Use available technology to give providers a reimbursable debit card system for shopping

Summer Food Service Program (SFSP)

Many of the commenters called for expanding the reach of the program. Commenters suggested reducing area eligibility to 40 percent, increasing site locations, and improving outreach and awareness about the program. Other comments included:

Strengthening Program Management and Improving Nutrition

- Change bidding process for Food Service Management Company selection, allow requests for proposal
- Allow local schools to serve meals all year long; they have the facilities and staff and are the safest and best places for children to eat
- Allow schools to use summer feeding funds for meals during school breaks, whenever school is not in session
- Provide SFSP funding for alternative summer meals, not provided via traditional methods

Ensuring All Eligible People Have Access to Program Benefits

- Raise income eligibility guidelines to better reflect growing needs of poor or near poor families
- Do not require application process

- Provide resources for emergency food providers to respond to increased demand in summer
- Consider individual eligibility so children in isolated areas or participating in programs not primarily serving low-income children can receive a summer lunch or evening meal
- Allow flexibility in monitoring standards (for example, rigid lunch serving times) to permit summer programming at youth sites (for example, serving lunch early in order to take children to a pool)

Advancing Technology and Innovation

• Provide consistency to ensure technology is available for all sites

Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)

Many of the comments related to changes in the food package and called for a focus on nutrition education and combating obesity. Commenters also addressed management information systems (MIS) and electronic benefit transfer (EBT), requesting increased funding for development and implementation. Other comments included:

Strengthening Program Management and Improving Nutrition

- Establish true contingency fund
- Implement loan forgiveness for nutrition professionals who work in WIC
- Food package
 - Increase food items
 - o Require review at least every 10 years
 - o Increase quantity of eggs
 - Support new food package
 - o Include white potatoes
 - o Include wild salmon
 - o Increase flexibility
- Formalize support for breastfeeding and peer counseling; increase funding
- Provide and fund vitamin D drops to exclusively breastfed infants
- Broaden the definition of nutrition contacts for participants to include education via computer and other technological means
- Use of food funds for breast pumps
 - o Eliminate using food funds for breast pumps
 - o Eliminate restrictions on using food funds to fund breast pumps
- Invite the Institute of Medicine to conduct a study on the current practice of collecting blood work from WIC participants
- Retain current practices on determining program eligibility
- At the end of the fiscal year, allow State agencies to spend WIC food funds forward, similar to "spend forward" formula for nutrition services and administration (NSA) funds

• Make WIC certification period for children one year

- Provide uniformity in the WIC process to eliminate confusion from State to State
- Allow for sound judgment in the Penalty and Rules Program
- Continue to work with the pediatric community, who are able to identify high-risk and low-risk participants and help with breastfeeding support
- Do not hold WIC vendors accountable for the negligence of others if they can show that they have provided adequate training on the WIC procedures and protocols
- Do not limit the amount of licenses in a geographical area as this affects the retailer's ability to provide good customer service and causes businesses to stop investing in the community if they are not able to secure a license and provide similar services to other vendors in the area
- Eliminate cost neutrality requirements for EBT

- Require State agencies to implement cost containment measures other than infant formula rebates
- Expand income eligibility requirements
- Consider needs of military families receiving hardship pay so they are not disqualified
- Integrate WIC services into health services
- Support the use of Medicaid adjunctive eligibility for WIC

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- Improve MIS to ensure security, dignity, and convenience for participants
- Increase funding to States to enhance their computer systems in order to implement the new food packages
- Allow the use of technology and/or alternative methods to improve nutrition education
- Give retailers time for readjustment when food prices increase and for reprogramming of registers when changes occur; consult retailers for recommendations on how to make this process smoother and faster

WIC Farmers' Market Nutrition Program (FMNP)

Commenters addressed funding and participation issues. Specific comments included:

Strengthening Program Management and Improving Nutrition

- Allow community supported agriculture programs to accept FMNP checks
- Provide for consistent requirements between WIC and Senior Farmers' Market Nutrition Programs
- Reevaluate practicality of FMNP vouchers now that WIC cash-value vouchers are available

- Allow bulk purchases
- Remove the 30 percent State agency match so that more State agencies can participate