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A REVIEW OF CHILD NUTRITION PROGRAMS

HEARING

BEFORE THE

COMMITTEE ON AGRICULTURE, NUTRITION, AND FORESTRY UNITED STATES SENATE

ONE HUNDRED FOURTEENTH CONGRESS

FIRST SESSION

MAY 7, 2015

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A REVIEW OF CHILD NUTRITION PROGRAMS

Thursday, May 7, 2015

UNITED STATES SENATE,
COMMITTEE ON AGRICULTURE, NUTRITION, AND FORESTRY,
Washington, DC

The committee met, pursuant to notice, at 10:05 a.m., in room 216, Hart Senate Office Building, Hon. Pat Roberts, Chairman of the Committee, presiding.

Present or submitting a statement: Senators Roberts, Boozman, Hoeven, Perdue, Ernst, Tillis, Grassley, Thune, Stabenow, Brown, Klobuchar, Bennet, Gillibrand, Donnelly, Heitkamp, and Casey.

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

Chairman ROBERTS. Good morning. I call this meeting of the Senate Committee on Agriculture to order.

Welcome to our first hearing on child nutrition reauthorization in this Congress. I commend my colleague, Senator Stabenow, for her leadership on this issue, and more especially, the hearings she held last year.

The Richard B. Russell National School Lunch Act and the Child Nutrition Act of 1966 authorize critical programs of great importance for Kansas, our nation, our farmers, our ranchers, our growers, and our vulnerable populations, including, of course, hungry children.

The School Lunch Program was originally created as a measure of national security, "to safeguard the health and well-being of the nation's children and to encourage the domestic consumption of nutritious agricultural commodities."

Coming out of World War II, Congress saw the need to establish the School Lunch Program, in no small part to ensure our military had a sufficient supply of eligible individuals to defend our nation from global threats.

Additionally, the current research regarding the need for adequate nutrition during a person's developmental stages provides further support for what Congress knew even back then. Hungry children do not learn.

With threats to our national security and increasing economic competition, it is imperative that our nation's youth are physically fit for military service and are not malnourished at key times in brain development.

Furthermore, the original two-fold intent of the program still holds true today. First, the programs provide a safety net for our

most vulnerable populations, mainly children, that are at times without sufficient food.

Second, the law requires a portion of the assistance for the school meal programs to be in the form of agriculture commodities produced here in America by our nation's farmers, ranchers, and growers.

As we begin the reauthorization process, it is important to remember the purpose of these programs. These programs are not about anyone's legacy. They are about ensuring our nation's security, ensuring that our children are well educated and productive contributors to a competitive economy, and about helping the vulnerable among us who cannot help themselves.

I plan to conduct this reauthorization, with full cooperation with our distinguished Ranking Member, in the same way in which I am seeking to conduct all of our business here at the Agriculture Committee. First, with the perspective of our constituents in mind. We are here for farmers, ranchers small businesses, rural communities, and program participants and stakeholders. We are here to write their interests and their will into law, not to impose the government's will and interest on them.

Second, this reauthorization will include rigorous and thorough oversight of these programs. Periodic expiration and reauthorization of legislation provides Congress with the opportunity to review and evaluate programs, and this opportunity should not be taken for granted. It is our responsibility to closely examine each program. Not every program needs a major overhaul, but every Federal program can benefit from increased efficiency, improved integrity, and reduction of waste.

Our committee will conduct this reauthorization in an open and transparent manner that gives members an opportunity to pass good legislation for their constituents. I would like for this to be a bipartisan bill, and I am pleased that Senator Stabenow feels the same way. With the entire committee working together, we can develop a well-rounded bill that will improve the operation of these important programs.

It is also my intention to complete this reauthorization on time, before the programs expire at the end of September. I understand there are some that may prefer that we not succeed in this endeavor. I caution those individuals that these programs are too important not to reauthorize. Gambling, fortune telling, or using a crystal ball to predict a better reauthorization in the future is foolish and short-sighted. It is time for folks to come together and be part of crafting legislation, not to stand outside the process hoping it fails.

We have been in a listening mode in preparation for this reauthorization and that culminates in today's hearing. I have traveled throughout Kansas, visiting school food directors, talking with parents, students, school administrators, and others involved in these programs. We have had hearings last year and we have our experts here today. As we seek to put what we have learned into legislative form, several priorities have become clear.

First, reauthorization provides an opportunity to review programs and improve their efficiency and effectiveness. In the school meal programs, there are significant error rates and improper pay-

ment levels. These have recently been highlighted in reports from the Department of Agriculture's Office of Inspector General and the Government Accountability Office. We will need to improve the administration of these programs to reduce errors, but do so in a way that does not layer additional Federal bureaucracy and overreach on those who are seeking to feed hungry schoolchildren.

Second, it is evident that evolving programs encounter different challenges as they try to adapt to changing times. Each new challenge is met with additional modifications, guidance, or regulation, and these can unintentionally evolve into very complicated systems that are often outdated or needlessly cumbersome. We need to identify areas in which we can simplify, make things easier for those implementing and participating in the programs.

Third, my travels in Kansas, and I am sure that this opinion is shared by many on this committee, have also indicated that we need some flexibility. Many folks are worried about what flexibility means. But to me, flexibility means we will still protect the tremendous gains already achieved by many and provide assistance to others so they, too, may achieve success. These programs cannot help anyone if they are not workable.

The Department of Agriculture and others have worked very hard to help those who are not meeting the current standards and have promoted statistics citing high rates of compliance. Yet, we have schools that are currently struggling. I understand that at least 46 States applied for the recent whole grain waiver, and we have additional sodium restrictions that are still on the way. Lines in the sand and uncompromising positions will benefit nobody, and especially not the hungry children that these programs serve. Working together, I am confident we can find a way to preserve the nutritional quality of school meals without a one-size-fits-all approach that prevents some local flexibility.

These programs have historically had strong bipartisan support. In 2004 and 2010, child nutrition reauthorizations passed the Senate by unanimous consent. But, debate leading up to those bills also included significant controversy similar to the issues we face today. Yet, Republicans and Democrats worked through the process together and came up with legislation that everybody could support.

Finally, it is vital that this legislation does not contain additional spending without an offset. That is just where we are. We have received many bipartisan suggestions for ways to improve these programs, but many of those have considerable price tags. Our budgetary constraints are real. Our responsibility to our constituents includes not spending money that we do not have.

I look forward to working with Senator Stabenow and each member of the committee throughout this reauthorization process.

I am also appreciative of the witnesses here today. A special thanks to Ms. Cindy Jones, who has been our shotgun rider, if that is the proper term, and who has traveled from Olathe, Kansas, to be on our second panel. I look forward to hearing from our witnesses regarding their experiences with these programs and I thank them so much for their testimony before the committee and taking their valuable time to come here.

I now turn to my colleague, the Chairperson Emeritus of the committee, Senator Stabenow, for any opening remarks she may have.

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

Senator STABENOW. Well, thank you very much, Mr. Chairman, and I look forward to working with you on this important issue.

We have been talking and looking for ways that we can move forward together and I look forward to working with you on this, as well as the entire committee, as we continue the work we began last year to strengthen child nutrition programs.

I want to thank the witnesses, as well, for testifying today. You bring very important perspectives from all sides of the issue. There are a lot of important pieces to this legislation and it is important we hear from you and work together to move forward.

As we all know, our children's health and well-being really are at a crossroads. Obesity rates in children have tripled in the last 30 years. Today, one in three American children and teens are overweight or obese. We are now seeing health problems typically unseen until adulthood—high blood pressure to type 2 diabetes—that are in young people who should be focused on Little League or going to the prom. This obesity epidemic requires a serious commitment on our part to continue moving forward with the nutrition policies we put in place five years ago in order to give our children a fair shot to be healthy and successful.

Last year, this committee heard from retired military leaders desperate to help improve the health conditions of our soldiers and young recruits, and as the Chairman said, the School Lunch Program actually started as a result of our military leaders and the Department of Defense. In his testimony, retired four-star Air Force General Richard Hawley said that obesity is one of three main reasons why an estimated 70 percent of all young people who walk through the recruiters' door at the age of 17 through 24, one of three reasons why they do not qualify for military service, and they indicated that was the largest reason.

Their concerns are echoed by more than 450 retired generals and admirals who are trying to raise awareness about the impact that poor childhood nutrition has on our national security and its cost to taxpayers. This recruitment crisis also requires us to continue moving forward with the nutrition policies we have put in place five years ago.

In addition to childhood obesity issues, we also have the second challenge of childhood hunger. As we approach the end of the school year, more than 20 million young people—20 million students who eat at school because they qualify for free and reduced price meals—will struggle to eat any meal, let alone a healthy meal, in the summer. This hunger crisis for our children requires us, as well, to continue moving forward to strengthen our Summer Meals Programs and other supports for children.

We also have millions of pregnant moms and children in our communities who are nutritionally at risk, which can lead to low birth weights, increased childhood disease, and impaired brain

damage. That is why continuing to protect and strengthen the WIC program is so important.

It is for all of these reasons and many, many more that we meet today, and it is the reason we must take this process of reauthorizing our child nutrition programs seriously, and I appreciate that the Chairman does.

The good news is, for the first time in years, it looks as though we are beginning to make some progress on these issues. Obesity rates have begun to stabilize in some areas. More children are eating healthy breakfasts and lunches than ever before. Children are eating 16 percent more vegetables, 23 percent more fruits, according to the Harvard School of Public Health.

I have said many, many times, it seems to me that our children are worth continuing the requirement of school meals for a half-a-cup—that is not very big, there is not a whole lot that goes in this, actually—a half-a-cup of fruit or vegetable as part of our commitment—it is not the whole commitment, but a very important part of our commitment—to our children's health and success.

But, we know there is much more to do. Nutrition at its core is preventative medicine, and child nutrition is about leveling the playing field so that any baby, any child, any teen, whether they are in Detroit or rural Kansas or a suburb of Atlanta or a farm in Iowa, has every opportunity to be healthy and successful.

That is why it is crucial that this committee work together in a bipartisan way to ensure these nutrition programs continue to operate efficiently and effectively and that we continue to move forward for our children. Our children and our families are counting on us to do just that.

Thank you, Mr. Chairman.

Chairman ROBERTS. Thank you, Senator Stabenow, for an excellent statement.

All members should be advised we have a vote at 10:30. Well, let us just change that. The vote has been postponed until 2:00 this afternoon.

Senator STABENOW. Oh, there you go.

Chairman ROBERTS. So we can finish.

Senator STABENOW. Magic. You have such power, Mr. Chairman.

[Laughter.]

Chairman ROBERTS. It is just amazing what you can do with a new Congress, Senator.

[Laughter.]

Chairman ROBERTS. Sorry about that.

Senator STABENOW. I object.

[Laughter.]

Chairman ROBERTS. Let the record show an objection was heard.

[Laughter.]

Chairman ROBERTS. Let me introduce our first panel. Stephen M. Lord, Managing Director, Government Accountability Office, Forensic Audits and Investigative Service. Mr. Lord currently serves as the Managing Director of the Forensic Audits and Investigative Service at the GAO. He oversees a highly trained staff charged with conducting special audits and investigations on major Federal programs prone to fraud, waste, and abuse. Mr. Lord has received

many awards over his 30-year career, including awards for Meritorious and Distinguished GAO Service.

Mr. Lord, welcome, and I look forward to your testimony. Please go ahead, and then I will introduce Ms. Neuberger for her statement.

STATEMENT OF STEPHEN M. LORD, MANAGING DIRECTOR, FORENSIC AUDITS AND INVESTIGATIVE SERVICE, U.S. GOVERNMENT ACCOUNTABILITY OFFICE, WASHINGTON, DC

Mr. LORD. Thank you, Chairman Roberts, Ranking Member Stabenow, members of the committee. Thanks for inviting me here today to discuss the findings and recommendations of our 2014 report on the School Meals Program.

As you know and as you mentioned in your opening remarks, the School Lunch and Breakfast Programs play a very important role in providing for the nutritional needs of schoolchildren across the nation. At the same time, the National School Lunch Program is on OMB's list of high error prone programs due to its large estimated improper payments rate, and this underscores the need to me to ensure sound controls are in place to ensure that $15 billion in Federal funds are spent wisely.

Today, I would like to discuss two things, first, some positive actions USDA has taken to strengthen oversight of the program, as well as additional opportunities that GAO has identified to enhance controls.

First, in terms of USDA actions, the Department has worked closely with Congress to develop legislation that requires school districts to directly certify students in the SNAP Program, and according to USDA officials, direct certification of these students reduces the administrative burden on school districts. It also reduces certification errors and helps without adversely impacting access to the program.

Another positive development is State agencies now conduct administrative reviews of school districts every three years as opposed to every five years, as it was done formerly. We think that is a really important part of the oversight process and the effort to help ensure correct eligibility determinations.

Despite these positive actions, we did identify some additional areas where they could enhance verification without compromising legitimate access to the program.

First, we believe the school district reviews of questionable applications could be strengthened. Of the 25 school districts we examined, 11 did conduct these so-called "for cause" verifications, but unfortunately, nine school districts did not conduct any "for cause" verifications of questionable applications, and the remaining five districts said they would do it on an occasional basis when prompted to do so by outside stakeholders. That is why we recommended that USDA study this "for cause" verification process, figure out why the school districts were reluctant to do it, and consider issuing additional guidance, if needed.

We also recommended that USDA consider using computer matching to help identify households whose income exceeded eligibility thresholds. Under the current standard verification process, it is difficult to detect all households that misreport income because

the so-called standard verification process is focused on a small slice of beneficiaries, those with annual income within $1,200 of the eligibility threshold.

For example, in our work, we found that nine of 19 household applications were not eligible for free or reduced benefits, yet only two of these households would have been subject to the standard verification process because of the way they defined error prone applications. Thus, we think verifying a broader window of applications as well as using computer matching techniques, could potentially significantly strengthen the verification process, and again, without adversely impacting access to the program by those truly in need.

Finally, our report also recommended that USDA explore expanding the verification process to include those who are deemed categorically eligible for the program by virtue of their participation in other public assistance programs, such as SNAP, TANF, et cetera. We found that those applications are generally not subject to verification as highlighted by a few examples in our report.

We found one household that was certified through this process because they stipulated they had a foster child. Yet, when we interviewed the household occupants, we found they did not have any foster children. Another applicant reported they were enrolled in SNAP, therefore, they were automatically eligible. Yet, when we contacted the State officials, they said this individual was not enrolled in the SNAP program. So, we found some examples—again, these examples are not generalizable to the entire population, but we found enough examples to suggest that USDA needed to take another look at that.

So, the good news is, USDA agreed with all our report recommendations and we think the collective impact of all the recommendations, when implemented, will help strengthen the verification and oversight process to, again, to ensure only those truly deserving of the benefits receive them.

Chairman Roberts, other members of the committee, this concludes my prepared remarks and I look forward to any questions you may have.

[The prepared statement of Mr. Lord can be found on page 69 in the appendix.]

Chairman ROBERTS. Mr. Lord, thank you very kindly.

Our second witness is Ms. Zoe Neuberger. Ms. Neuberger joins us today from the Center on Budget and Policy Priorities, where she is a Senior Policy Analyst. She works on the school meal programs and WIC and has been with the Center since 2001. Obviously, she is a veteran and knows what she is talking about. I did not mean to insinuate you did not, prior to 2001.

[Laughter.]

Chairman ROBERTS. Previously, she was a Budget Analyst for these programs at the Office of Management and Budget.

Welcome, madam, and I look forward to your testimony and your insight.

STATEMENT OF ZOE NEUBERGER, SENIOR POLICY ANALYST, CENTER ON BUDGET AND POLICY PRIORITIES, WASHINGTON, DC

Ms. NEUBERGER. Thank you very much for the invitation to testify today on improving accuracy in the school meal programs. As you said, I am a Senior Policy Analyst at the Center on Budget and Policy Priorities, a nonprofit policy institute that conducts research and analysis on budget and tax policy as well as poverty and social programs.

Out of our roughly 50 million schoolchildren, about 30 million eat a school lunch on a typical school day. That is extraordinary reach, and that figure includes more than 21 million low-income children for whom school meals may be the healthiest and most reliable meals they get.

There are also nearly 100,000 schools that operate the meal programs and they do a remarkable job. They process applications, provide healthy meals, and keep track of the eligibility of each student so they can claim the appropriate Federal reimbursement. Their work means that we have fewer hungry children and that our students are better prepared to learn.

As you can see, the school meal programs play a vital role in children's health and well being. They must continue to play this role while also administering the programs accurately. The Department of Agriculture just estimated that the net annual cost of lunches that did not meet the nutrition standards was $444 million. That is not acceptable. The programs must make sure that Federal funds are used for meals that meet Federal criteria.

Fortunately, we have some powerful tools to address the issues. There is a verification process already in place. There is a new rigorous review process. USDA has instituted new oversight measures. USDA just completed a detailed nationally representative study that not only measures errors and their costs, but also identifies a great deal of information about the causes of errors, which allows for specific and effective policy solutions.

But, there are also challenges to improving accuracy in a vast and complex system whose main focus is to educate children, not administer the meal programs. As I mentioned, the school meal programs operate in nearly 100,000 schools nationwide and there is wide variation among them. Their staffing, resources, and technological capacity vary widely. There is also a lot of variation in the way children get meals in the lunchroom or the classroom and how the school checks who is in which category and counts the meals.

Small rural schools have very different operational and administrative capacity than large districts that serve hundreds of thousands of students. Meal tracking and accounting systems can range from paper systems to state-of-the-art software.

Schools are not currently set up to do the kind of eligibility determinations that other public benefit programs do. The SNAP Program or Medicaid, for example, have teams of professional eligibility workers who spend all day, every day, sorting out the details of applicants' income and household circumstances. In schools, there might be a cafeteria worker or secretary who handles meal applications for a few weeks at the start of the year.

So, the question is, given the tools at the program's disposal and the system we are dealing with, how can Congress improve accuracy in the meal programs?

An example can help show the way. Beginning with the 2004 reauthorization and building on that in 2010, Congress set a clear expectation for school districts and States to improve their use of the rigorous eligibility determinations made by other programs, primarily SNAP, to approve children for free meals automatically. That is the direct certification process. Because the school meal programs are relying on a more rigorous income assessment, this approach saves time and reduces errors.

In the past decade, there have been striking improvements. Nearly half of all children approved for free or reduced-price meals are now approved without having to complete an application. That is an enormous simplification and Congress played an important role by setting an expectation and then providing tools and support to meet it.

My written testimony describes many other tailored steps Congress and USDA have taken to strengthen the meal programs, but there is certainly room to do more. It is important to strengthen management and oversight across the board, provide more extensive help to districts that persistently struggle with errors, and pursue innovations that could open up new ways to improve accuracy.

For example, GAO recommended exploring the use of data matching to identify applications that might have incorrect information. That is worth trying. USDA plans to develop a model electronic application for the first time. That is another promising innovation.

As you consider ways to improve accuracy in the school meal programs, I urge you to consider these four questions. First, does the proposal have a proven record of reducing errors? Some ideas that sound promising, like requiring households to submit pay stubs with their application, have not actually been effective when tested.

Second, will it maintain program access for the most vulnerable children? Nearly 16 million children live in a household experiencing food insecurity. We certainly do not want to worsen that problem.

Third, is it administratively feasible? Adopting a more time consuming documentation or verification system might prevent some errors, but it could cause others by adding a step to the process and would force school staff to spend much more time determining school meal eligibility at the expense of other educational priorities.

Fourth, is it cost effective? High-quality information management systems can be very effective, but might cost too much for a small school district.

As I noted, it is critical that error reduction strategies not reduce access to school meals for children who need them. The best way to improve integrity in the school meal programs is not through punitive policies, but instead to continue sending a clear message to school nutrition officials that program accuracy is important, that it will be measured, and that Federal officials will support them in implementing needed improvements.

Thank you very much.

[The prepared statement of Ms. Neuberger can be found on page 84 in the appendix.]

Chairman ROBERTS. Thank you very much.

Mr. Lord, do you think that a shift from the current verification process that emphasizes "for cause" verification would enhance the program integrity, and secondly, would it have a negative effect on access for eligible participants?

Mr. LORD. No. I think, again, Senator, there is a way to do it without adversely impacting people who truly deserve it, and what we found in our work is the "for cause"—again, that is the review of questionable applications—some school districts were not doing any "for cause" verifications of questionable applications. So, there is definitely potential there to do that more consistently across school districts.

I should add, that is a USDA requirement. School districts are required to conduct these type of reviews, so any time we see that type of inconsistency, that gives us some concern.

Chairman ROBERTS. Ms. Neuberger, I would like to know more about the point of service, when the child and the cafeteria worker interact and determine how the meal will be paid. You have cited this in your statement as a step at which many errors occur. Can you walk us through what happens exactly at the point of service? I am not an expert, but Cindy Jones is, and there seem to be a number of points of error. If you could clarify that point of contact for me, please, it would be helpful.

Ms. NEUBERGER. Absolutely, and it sounds like you have had a chance to visit school meal programs, which is great. I hope that if the rest of you have not had an opportunity, that you will find one soon, because there is nothing like seeing it firsthand.

Chairman ROBERTS. Well, you can lose a little weight there, too.

[Laughter.]

Ms. NEUBERGER. But, let me describe a typical scenario. There is a lot of variation, but you might have a cafeteria with a 30-minute lunch period, dozens if not hundreds of students coming through a line. Sometimes there is choice about what they take, not always. When they have their meal on their tray, they go to a cashier at the end of the line. That cashier needs to check the meal to make sure it is meeting nutrition standards and figure out who the child is to make sure that meal is marked down in the right meal category, free, reduced-price, or paid.

Now, that is a process that has to happen very, very quickly when you have lots of students waiting in line and it is only when they get through that process that they finally get to eat. So, this is not a sophisticated interaction. We are talking about, maybe a seven-or eight-year-old and a cashier and it has to happen really fast, and that does create opportunities for errors.

There are also more innovative models that are being tried now that can make it easier for kids to get meals. So, for example, for older students, there might be a cart in the hallway where you can pick up a breakfast and take it with you to class. That makes it much easier for students to eat. It also reduces errors related to what is in the meal because they are taking a prepackaged meal. But, that is a very fast transaction where you have to have a process for knowing who is taking the meal and keeping track of that.

Meals are sometimes served in the classroom. Again, the process is decentralized and that means there are sometimes opportunities for error and you need to react accordingly.

Chairman ROBERTS. Well, thank you for that explanation.

A question for you both. Is electronic data matching the method of additional verification that would be least burdensome to school food service providers. Which of the other methods of improving program integrity that you recommend will cause the least additional burden?

Mr. LORD. Do you want to go first?

Ms. NEUBERGER. Sure. I will go ahead. So, data matching is used now at two different steps in the process, first, at the certification, which is the approval point, where you can use data from SNAP anywhere in the country and certain States are allowed to use Medicaid data to automatically enroll kids. The application process has been a source of error, and so the fewer families have to go through that process, the more that can be automatically enrolled, the more you reduce opportunities for error.

The program has been moving in that direction. Over the last five years or so, many more students are directly certified. As a result, even though there are more children in the free or reduced price category now than there were because of the recession, schools have to process applications for two-and-a-half million fewer children. So, that is much less paperwork for schools. That is a great step forward.

The other place where data can be used is at the verification stage. That is checking applications. That is where I think there is room to look at more data sources, as GAO recommended.

I would caution against just expanding the number of kids that get verified because many families do not respond to that request, and if they do not, they lose benefits whether or not they are eligible. But, data could be a very good way of pinpointing applications——

Chairman ROBERTS. I am a little worried about the privacy issue.

Ms. NEUBERGER. Yes.

Chairman ROBERTS. Well, I am more than a little worried, but at any rate, let me just say that I have a concern about holding States accountable to a different standard. We received a report from the Inspector General of the Food and Nutrition Service indicating, and I think my figures are accurate here errors of $1.9 billion in school lunch, errors of $770 million in school breakfast. We are not the Pentagon, or, for that matter, any other agency, but that is a considerable amount of money. I do not know if either one of you have had access to that information or if you would like to make a comment on that, but it is a concern of the committee.

Mr. LORD. I agree with you, Mr. Chairman. The improper payments rate overall for the programs is about 15.25 percent. The good news is it has declined slightly from last year, assuming, the data is reliable. At the same time, close to a billion dollars of the improper payments were in the certification area——

Chairman ROBERTS. Let me just——

Mr. LORD. —errors, so——

Chairman ROBERTS. I apologize for interrupting——

Mr. LORD. Sure.

Chairman ROBERTS. —but I am already over time and we have gone on a considerable amount of time. We have a lot of people waiting. But, basically, we have very large errors—$1.9 billion in school lunch, $770 million in school breakfast. It is my understanding that States are asked to audit every three years, but this last report, or the last report that we could come up with, was based on data from clear back in 2005. That has been ten years. So, I think we are holding the FNS and the Federal component of this, which, of course, is now playing a much stronger role, to a different standard than that of the States, and that is of concern to me. Why ten years?

Ms. NEUBERGER. So, the reviews of districts do happen now every three years. The kind of report that you are talking about——

Chairman ROBERTS. Right.

Ms. NEUBERGER. —is the nationally representative study that USDA does. It is a very in-depth report where they go out and interview households, they stand in cafeterias and watch what is on the tray to make sure there is accuracy. That kind of report is very important. It also is relatively costly and takes a long time to do. But, it provides the kind of information that can be very helpful to developing proposals for how to improve errors because you really get to the bottom of what is causing errors and what kind of errors are most prevalent and that allows you to design tailored solutions.

Chairman ROBERTS. Senator Stabenow.

Senator STABENOW. Well, thank you very much, Mr. Chairman.

In this area, we juggle, of course, the desire and the need to make sure that we are accurate, that children who need and qualify for lunches and breakfasts are getting it as opposed to those who should not be. On the other hand, we have situations where we do not want to add additional costs to the local schools who are juggling between administrative costs and actually providing quality meals, and so we have a number of issues to juggle.

I know in the last bill that we did, having community eligibility put into place has made a huge difference in Michigan in schools being able to be more efficient and have more dollars going actually to feeding hungry children.

But, Mr. Lord, first, it sounds like you were saying that the USDA has accepted your recommendations and are moving forward to make changes, is that my understanding?

Mr. LORD. Yes, absolutely. They agreed with all of our report recommendations and recently provided an update of steps they are taking to implement them, which is, frankly, good news for the program.

Senator STABENOW. That is great. That is wonderful.

When we talk about program integrity measures, which are very important, they can have unintended consequences of removing children who actually should be getting food. Could you give us some examples when this happens and what approaches we can take to actually improve improper payments at the same time protecting access for children? What is the best way to do that?

Mr. LORD. Well, as we highlighted in our report, we think you can attack this from various angles. Obviously, the verification process, we think, could be strengthened. Again, you can do it in

a way it is not going to adversely impact children truly in need. I get the sense the school districts are reluctant to do this, though, because of the lack of training, expertise, fear——

Senator STABENOW. Is it extra cost for them and the kinds of things that you are talking about?

Mr. LORD. I believe it would impose some additional cost, but in the end, the net result would be, though, you are potentially freeing up some additional funds you could devote to the program, to those who are truly deserving. So, from a cost-benefit standpoint, I think it would be effective, but that is USDA's call. They would have to do more additional studies on that.

Senator STABENOW. I think that is always the juggling.

Ms. Neuberger, talking about the verification steps and the additional administrative costs and how we balance that, obviously, we want integrity in these programs and we want every penny to go to children who need it, but even automated tools can be cost prohibitive for some schools that are on tight budgets. Do you believe additional investments in error reduction could come at the expense of improving meals, and when you look at the per meal reimbursement, what funding do they get to cover administrative costs associated with meal programs versus investments in technology, because I think we really need to understand this so that we can do this right.

Ms. NEUBERGER. That is a really important question. At the school district level, schools get a per meal reimbursement. That is for free meals, just about $3 right now, and that has to cover all the costs associated with running the program. So, it is buying the food, it is the staff to serve it and prepare the food, and it is all of the administrative processes. There is not a separate funding stream to cover buying a software system or putting more staff in place to do these kinds of checks. So, it is really important to balance the goals here, because if too much of those funds have to go toward administrative processes, they are not available for food.

At the Federal level, there have been grants to States to improve their technology systems and those seem to have been contributing to a reduction in that kind of error. So, that has been a great investment that is paying off.

Senator STABENOW. The Chairman and I have been talking about the fact that particularly for very small schools—I went to school in one of those in Northern Michigan—it can become particularly difficult, and so we are interested in working with you on recommendations as it relates to very small schools, as well.

Chairman ROBERTS. Yes. Would the Senator yield on that point?

Senator STABENOW. Yes, I would be happy to.

Chairman ROBERTS. I have not visited enough schools yet, but we are getting there, and there is a tremendous difference in the school that Cindy represents and other schools that are doing this. They are doing a pretty darn good job. Then you go to rural and small town America, and, I mean, real rural and small town America. They simply cannot keep pace with the regulations, the paperwork, et cetera, et cetera. Training, as Mr. Lord says, obviously would certainly help out. They are doing the best they can. So, this is not a one-size-fits-all. I know that is obvious to everybody here,

but I wanted to underscore what Senator Stabenow has said. I mean, we have got some real challenges out there. Thank you.

Senator STABENOW. I am going to reclaim my time and take one more question—ask one more question, and, Ms. Neuberger, for you, as well. We know that simple errors on applications—and this goes to how we—the bureaucracy and how we do all of this for families. It is not only the school, but we need to care from the families' end of things in terms of what we are adding in bureaucracy. Simple errors on applications are often the cause of improper payments. So, it is not just intentional lack of reporting. If somebody makes a mistake——

Ms. NEUBERGER. That is right.

Senator STABENOW. —they do not fill in a box, they do something that is simple but it creates that error that Mr. Lord is talking about. In some cases, errors result in children ending up having to pay for meals or they may not be paying for meals because of some simple error.

So, to help make the system more efficient and ensure all children receive meals, what are, again, some of the ways applications can be improved, the actual application? I know that direct certification has been very successful. How can we better utilize the data matching to reduce errors so that we, again, from the families' end, are not penalizing a child because somebody did not check a box?

Ms. NEUBERGER. That is a great question. So, the first step is to make sure you are relying on data from other programs as often as possible, so as few children as possible go through the application process. That improves accuracy right there.

But, then, there will always be children who are going through the application process and so you need to have it be a simple, understandable form. The process cannot be like other programs where you are sitting in an office with a professional eligibility worker who can provide a lot of information and ask a lot of follow-up questions. Typically, the application goes home, families fill it out on their own without assistance, and they may not know that you need to multiply weekly income by 4.3 to get your monthly income. They may not know who they are supposed to list in the household.

It is very clear that people have trouble understanding the application, and one indicator of that is that in USDA's study, they found that out of the children who did not get meals that they actually legitimately were eligible for, three-quarters of the time, that was because the family had understated their income on the application. So, these are families that bothered to apply, they qualified for the meals, but they did not get them because they misunderstood what was expected.

USDA has just issued a brand new revamped application that is much simpler than the old version and should be helpful in terms of eliciting correct information, and they are just embarking on developing an electronic application, which is, again, very promising for making it easier for families and schools to get the right information.

Senator STABENOW. Thank you.

Thank you, Mr. Chairman.

Chairman ROBERTS. Senator Boozman.

Senator BOOZMAN. Thank you, Mr. Chairman.

I guess the question I would have would be, do we have districts that—Mr. Lord, do we have districts that you have knowledge of that are doing a much better job than the average in regard to the problem? Are there districts that we can learn from that we can then take their knowledge and push to other districts?

Mr. LORD. Sure. I am sure there are, Senator, but unfortunately, our scope was confined to the 25 school districts we examined in detail. There are thousands of school districts across the nation. We did not have the time or resources to visit all of those, but we did get some important insights just from visiting the few we did examine in great detail.

Senator BOOZMAN. Very good.

Ms. NEUBERGER. If I can add to that, with regard to direct certification, the use of data from other programs, USDA does rank State performance. There are States that are doing a fabulous job. West Virginia and Kansas are example of those, and you will have people on the next panel who can speak to that. Michigan is another great example where they have taken advantage of resources and made continuous improvements and got a performance bonus and are now directly certifying one hundred percent of the kids who they should be. So, there are great examples at the State and district level and USDA is working on sharing those best practices so that others can learn.

Senator BOOZMAN. Good. I would like to just also acknowledge the importance of simplifying the application processes. I was on the school board for seven years, and the paperwork on these type of things, our poor special ed teachers that work so hard, the paperwork that they endure, and the list goes on and on. Again, I would just like to throw my two cents in that is something that, that does not cost any money. That ultimately saves a lot of money. There is just something about government—and I am part of government—that we just add to that burden, whether it is the IRS or this or anything else. So, again, I think that is very, very important, and hopefully, we can work to remedy that.

Thank you, Mr. Chairman.

Chairman ROBERTS. Thank you, Senator.

Senator Gillibrand.

Senator GILLIBRAND. Thank you, Mr. Chairman, thank you, Ranking Member Stabenow, for holding this hearing. This is an issue that I care deeply about. I brought apples today, so this is the half-cup of apples that I am really hoping we can get in every school lunch program across New York. Lots of States have lots of great produce, but this is a half-cup, so for parents in the room, we know this is not a lot of—you brought your half-cup. I am going to put these in the anteroom. Staff can have them. I had a pack. They are really good.

So, since we are talking about this issue of school meals, the one issue that I want this committee to remember, because I think it is so important, that we should not cut the standards. The Chairman said that 40—what did he say, 46 States applied for whole grain waivers. Those are just individual schools within 46 States, but 90 percent of schools are complying. So, we are actually doing

quite well in meeting the nutrition standards that we set aside in the last bipartisan bill on this topic.

So, I really want to make sure we do not cut the requirements, specifically for the half-cup of fruits and vegetables, because as Senator Stabenow mentioned about obesity, if one in three kids are obese in this country, what are we doing? I mean, we need to make sure these kids understand they should be eating fruits and vegetables daily, that they are a really important part of how they grow, how they learn, how they are healthy. The rate of obese adults in this country is, again—and your statement about our military and having access to the men and women they need to be fit is a real concern.

So, I think it is important for us to look at the dynamics of the fruits and vegetables requirement. If we are cutting the standards for school meals, I think the kids get the biggest hit. Who suffers most financially? Who loses the most business? It is actually farmers, and I want to talk about the farmers in my State and the farmers in other States on this committee.

So, in Kansas, they produce honeydew melons, which I know my kids love, and that is a great school snack, to have access to real melons. In Mississippi, blueberries—kids love blueberries. Kentucky, blackberries. Arkansas, edamame, one of the most easy, fun vegetables for kids to eat. They love edamame. Sweet potatoes—we prefer them fried, but, yes, they are very good, too. Cherry farmers in Nebraska, fields greens in North Dakota, watermelon in South Dakota, peach growers in Georgia, and apple growers in New York. All of those farmers across the States represented by this committee would really be harmed if we reduced the standards for that half-cup.

If we cut fruits and vegetables from our school meals, not only do the farmers suffer, but I really believe the kids suffer. My children benefit so much from having access to fresh fruits and vegetables every day, in every meal, and they love them as a consequence. They know how good it is to eat fresh fruits and vegetables during their meals.

So, I am hoping that as we debate these issues going forward, we can focus specifically on how we keep these standards.

Now, I know both of you are testifying specifically about how we can affect and change errors, so I want to talk specifically about that for a question. Ms. Neuberger, in your testimony, you mentioned that counting and claiming errors often result from busy lunchrooms where students have little time to select, pay for, and eat their meals. Many of these operational errors occur at point of sale. Should we consider making more resources available for point of sale systems to reduce errors and improve program integrity?

Ms. NEUBERGER. Thank you. Certainly, automated systems can make the process much easier. They do take an up-front investment and so you need to balance the costs involved with the simplifications and the error reduction. But, places that are using them generally report that they do simplify the process tremendously for students and for the school nutrition staff, who clearly have a lot of things that they are juggling in the lunchroom. And making that process simpler and more accurate is a great way to go.

Senator GILLIBRAND. You mentioned a bit about the community eligibility and that we need to eliminate the need for meal applications completely and eliminate much of the potential error. What can we do to lower the barriers to CEP participation by eligible districts and schools? What are your top recommendations to do that?

Ms. NEUBERGER. So, it is actually a new option that is working very, very well right now. This is the first year that it is available nationwide. It builds on options that have been available for a long time, which are available to high poverty schools so that they do not have to go through the standard application process, where, essentially, they would be finding the few children who do not qualify for free or reduced price meals. In essence, the whole school qualifies to serve meals at no charge.

With community eligibility, they do not take applications. They rely exclusively on data from other programs, so that reduces errors and opportunities for error. In USDA's report, they found, as expected, that there were fewer errors in those schools. So, the school districts are realizing what an advantage that can be, and what they see is, because they do not have to spend time on paperwork, the savings that they get on the administrative side can be reinvested in meal quality and in serving all students at no charge.

Senator GILLIBRAND. Thank you, Mr. Chairman. Thank you.

Chairman ROBERTS. Senator Casey.

Senator CASEY. Mr. Chairman, thank you very much, and I want to thank Ranking Member Stabenow for having this hearing, as well. You are both good to have us gather on these issues. We are grateful.

I wanted to say, first, that we have two major concerns when we talk about these programs and about food insecurity. One, of course, we should start with the children. In Pennsylvania, we have not only a lot of children participating in both school lunch and school breakfast—in fiscal year 2014, over a million children in the School Lunch Program and a little more than 346,000 in the School Breakfast Program—but at the same time, we have almost a half-a-million children in poverty in our State. So, this is of great urgency and concern that we get this right.

I have always been a believer that these programs, just like a number of other programs or strategies, can help us not only ensure that more children have a measure of food security and get the nutrition they need, but it can also help them learn, of course, and I have always believed that kids, if they learn more now, they are going to earn more later, and it is not just a rhyme, it is backed up by all the evidence.

The second major concern we have, of course, is not only making sure these programs work for kids, but making sure they are administered in a way that is consistent with the expectations of taxpayers and use taxpayer dollars efficiently. So, I appreciate the fact that you are bringing to us not only kind of a diagnosis of where the problems are, but also remedies for improving both programs.

Ms. Neuberger, I will get to you in a moment on kind of a broader question, but I want to ask you a specific question about the WIC Program, the Women, Infants, and Children Program. Your firm, the Center on Budget and Policy Priorities, just released a report with regard to new research linking prenatal and early child-

hood participation in WIC with improved cognitive development as well as academic achievement. So, kids whose moms are participating in the WIC Program while pregnant scored higher on assessment of medical development at age two than similar children whose mothers did not participate.

So, in light of this link between a program like that, the WIC Program, and the cognitive development of the child, and my learn means earn connection, can you walk through some of the benefits of WIC and why we should focus on that, as well?

Ms. NEUBERGER. Absolutely. WIC provides nutrition assistance for pregnant women and very young children and those are critical times for brain development, as we heard earlier. There is a large body of research that shows that WIC is successful in bringing participants very important improvements—improvements in health, improvements in their nutrition, eating healthier foods, improvements in breastfeeding rates, better connections to preventive care, higher immunization rates, and new findings on the link to cognitive development. So, that is a panoply of ways in which participating in the program can help low-income families and at this critical time, so that they get off to a better start.

Senator CASEY. I appreciate that, and I think it bears repeating.

Speaking of things we should repeat, could you walk through the four questions again that you had in your testimony, in other words, questions we should consider when we are analyzing these programs. I think it is very important to have that guidance. I just want to have you repeat it, because around here, it helps to repeat things.

[Laughter.]

Ms. NEUBERGER. Okay. Absolutely. So, does the proposal have a proven track record of reducing errors, and that is where all the research on this subject can be very helpful.

Will it maintain program access for the most vulnerable children? So, of course, when you are reducing error rates, you do not want to have the unintended consequence of making it harder for kids who qualify for the meals and need them to get them.

Then, is it administratively feasible? So, that goes to, there is not a one-size-fits-all solution. You need to think about what works.

Fourth, is it cost effective? So, will the error reduction be worth the cost involved in setting up the system and not make it such a cumbersome process that it is more difficult for schools to administer.

Senator CASEY. We may put those on a chart so we can have them in front of us.

[Laughter.]

Senator CASEY. In the very limited time I have, Mr. Lord, I just want to ask you one question, and I may submit more to both of you for—written questions.

On this question of direct certification, do you think that increasing participation in community eligibility and direct certification would help reduce improper payments?

Mr. LORD. I believe it could, if applied properly. We looked at the direct certification for 23 households. We found errors in a couple, but in our discussions with USDA officials and as Ms. Neuberger pointed out, that would greatly relieve the administrative burden

at the school district level and has potential for streamlining the entire process.

You just want to make sure the initial certifications at the SNAP level and other program levels are being done correctly. But, it is—I should point out, the improper payment rate in the SNAP Program is much smaller than the improper payment rate in the School Lunch Program, so that suggests that is a good way to go, based on just that comparison alone.

Senator CASEY. Thank you.

Mr. Chairman, thank you for the 45 extra seconds.

Chairman ROBERTS. Any time the gentleman requests additional—well, not maybe any time.

[Laughter.]

Senator CASEY. I am ready.

Chairman ROBERTS. Thank you, Senator Casey.

I want to thank the first panel. Thank you so much. The first panel is now concluded. I am sorry.

Senator STABENOW. Is that because he is so far away?

Chairman ROBERTS. Senator Thune, I apologize to you, sir.

Senator THUNE. Well, thank you, Mr. Chairman. I know that I am down here a long ways——

[Laughter.]

Senator THUNE. —at the children's end of the table, so——

Chairman ROBERTS. Well, a man has got to do what he has got to do.

[Laughter.]

Senator THUNE. That is right.

I appreciate you and Ranking Member Stabenow holding this hearing today, and as we do prepare to reauthorize the child nutrition legislation this coming year, we need to, I think, take an objective and bipartisan critical assessment of the programs and make sure that they are working in an efficient, effective, and accountable manner for the people that they are intended to help.

I have serious concerns about the error rates in the National School Lunch and Breakfast Programs, which for the 2013 and 2014 school year were 15.8 percent and 23.1 percent, respectively. Improper payments for these programs total almost $2.7 billion for the 2013–2014 school year, which is a staggering amount. Obviously, no one in this room wants any child to go hungry. We all know there are legitimate needs for food assistance. But, when we have programs with error rates that are $2.7 billion just for one school year, we simply have got to figure out how to put this money to better use.

There is another area that I think needs attention of this committee and that is eligibility standards for these programs. Do the current standards result in child nutrition assistance being distributed wisely to the people who really need it the most?

Just a couple of questions, if I might, for this panel. I would love to hear from the second panel, too, about the rigidity in the programs and the people who are actually out there on the front lines. I would love to get a sense for the standards and just the lack of flexibility that exists today and doing a better job of balancing nutritional offerings. So, anyway, I would love to hear from the second panel about that subject.

But, I guess the question I have for you is what would you change about the eligibility requirements of the current child nutrition assistance cadre of programs as they exist today?

Ms. NEUBERGER. I think the important thing when you are talking about reducing errors and improper payments, which I think we all agree is a very important endeavor, is to create a culture of compliance with the rules. We want the rules to be followed. I do not think the rules themselves are the problem. I think it is helping people understand them, and there are lots of different people involved in the system. It is families when they are filling out applications. It is schools when they are running programs. It is States when they are administering them. So, I think that kind of day in and day out work is what is most important to reduce errors and reduce improper payments in the program.

Senator THUNE. Okay.

Mr. LORD. I would second that and also add it is important to, as a former President once famously stated, it is important to not only trust, but verify. I would add to that and say it is important to trust and verify in a meaningful manner. We found through our work that the verification process could be strengthened in several important ways, and I think that will serve the reduced improper payments rate and help drive that number down.

Although, I should add, in response to what Ms. Neuberger noted on the counting side of the equation, over $700 million of the improper payments estimate is due to simple counting errors at the school district level. So, I think that is an area that could be addressed, as well, through technology, better training. So, there are some important ways they could drive that number down and enhance the operations of the program.

Senator THUNE. So, do you believe that more State and/or local input on establishing eligibility requirements could be helpful in cutting down on some of the incorrect reimbursement rates?

Mr. LORD. Well, personally, I think there are two ways to go at it. You have to, first, explore the potential of data analytics and computer matching to help simplify the process, make it more efficient, and you can do that at the State agency level without getting down to the school district level.

But, at the school district level, again, I think there needs to be greater awareness about how to fill out applications completely, the need to periodically do spot checks of what people are reporting.

So, I think you have to approach it in a multi-faceted manner, centrally at the State agency level as well as the school districts. As Ms. Neuberger pointed out, though, they are not as well equipped to do real vigorous verification.

Senator THUNE. Right.

Ms. NEUBERGER. One of the things that makes the school meal programs easier to understand and administer now is that they do have one set of rules that applies across the country, and that is an important simplification and source of fairness. I think it is important to consult with districts and States about what will work to help the programs run more smoothly and more accurately in their areas. But, that is not the same as considering changing the eligibility rules or other program rules.

Senator THUNE. Right. Do you think that categorical eligibility for school meals ought to be eliminated?

Ms. NEUBERGER. No. That is basically the source of tremendous simplification. I mean, that is what allows families who are already getting SNAP benefits, where there is a very rigorous eligibility determination, to get free school meals. Their income levels are going to be at or below the levels that are already set within the school meal programs. So, basically, that is a tremendous simplification right now and I think it——

Senator THUNE. So, if that is true, then which ones should be utilized the most?

Ms. NEUBERGER. Right now, anyplace in the country is allowed to use data from the SNAP Program or TANF cash assistance. There are certain other categories, like children who are homeless or in foster care, that can also be automatically eligible. Medicaid is only available for use in seven States right now, and so that is a potential—there is untapped potential there where additional States could benefit from utilizing that data.

Senator THUNE. Good. All right. My time has expired, Mr. Chairman. I thank this panel and will look forward to the testimony from the next one. Thanks.

Chairman ROBERTS. Senator Stabenow.

Senator STABENOW. Thank you, Mr. Chairman.

I just wanted to do a quick follow-up, Mr. Lord. You were talking about how, as we look to simplification but also making sure we are rigorous in our oversight standards and so on, you indicated the SNAP Program has a smaller error rate, which it does, one of the smallest in the Federal Government in terms of overall errors, and that there is a larger error rate in the food program. So, if we were going more in the direction of tying it to SNAP, community eligibility, which has saved a lot of money in Michigan and been very effective, is that what you were suggesting, looking at SNAP, which actually has more rigorous oversight, lower error rate, and tying it to that might actually accomplish both goals of simplification and also tightening things up?

Mr. LORD. That was—yes, that is what I was suggesting, and I was citing the OMB figures on their estimated improper payments rate.

Senator STABENOW. Right.

Mr. LORD. You know, there is some degree of imprecision with it, but that alone suggests SNAP, even though there are some errors in the program——

Senator STABENOW. Right.

Mr. LORD. —when you rely on that method to enroll people in the school meals, it is——

Senator STABENOW. It is actually less——

Mr. LORD. Yes——

Senator STABENOW. —because I think it is below three percent, if I remember right——

Mr. LORD. Yes, it is——

Senator STABENOW. —right now, which is a very—it is actually the lowest error rate of anything that we have in——

Mr. LORD. Yes.

Senator STABENOW. —agriculture programs, so——

Mr. LORD. It is around three percent, and again, the National School Lunch Program is 15.25 percent.

Senator STABENOW. Right.

Mr. LORD. So, it is much higher.

Senator STABENOW. So, that is an interesting—I just think that is an interesting thing for us to highlight.

Mr. LORD. Although——

Senator STABENOW. Thank you very much.

Mr. LORD. Okay. One last point. In our report, even though we did note that if you are deemed categorically eligible for a program through programs such as SNAP, though, under the current verification process, you are excluded completely from verification. So, our point was you may want to subject some of those categorically eligible applications to scrutiny.

Senator STABENOW. Thanks very much.

Chairman ROBERTS. Senator Klobuchar.

Senator KLOBUCHAR. Well, thank you.

[Laughter.]

Senator KLOBUCHAR. I am sorry. We had a hearing on patent reform, which was quite exciting, or I would have been here earlier.

Thank you, Chairman Roberts and Ranking Member Stabenow for holding this important hearing to review the child nutrition programs in advance of our work to reauthorize the program.

I worked hard in the last reauthorization to strengthen local wellness policies, to update the nutrition standards for child care centers and after-school programs, and also to ensure that vending machines and a la carte choices would not undercut good nutrition in the sale of junk foods. I think we all know how important schools are to our kids' nutrition. I am proud of the work that we have done in the bill and I think we know that we have seen some improvements, but I think we also know that there are problems ahead if we do not continue this work to make sure the kids get the most nutritious meals possible when they are at school.

The 2010 reauthorization of child nutrition programs specified that USDA conduct a review of food items provided under the WIC Program at least every ten years based on the Institute of Medicine recommendations. Some have argued that the review process should be expedited in certain circumstances.

Ms. Neuberger, does the current review timeline keep pace with scientific advances on the nutritional quality of fruits and vegetables, and what can be done to improve the process?

Ms. NEUBERGER. There is a review underway right now, so I just want to make sure everybody is aware of that, so that is working as planned. The rule is actually that the review has to happen at least every ten years, but it can happen more often than that if there is reason. So, if there were important changes in dietary recommendations, that might warrant a more frequent review. But, I think the rule that is in place makes sense.

Senator KLOBUCHAR. Okay. Very good.

It has been estimated by the Journal of Health Economics that nearly 20 percent of annual medical spending in the U.S. is obesity related. How does this factor into the decision about how we reauthorize this bill? Either of you can answer that.

Ms. NEUBERGER. I think we have talked early on——

Mr. LORD. Yes.

Ms. NEUBERGER. Both programs, school meals and WIC have tremendous benefits in terms of helping children achieve the health and development outcomes you would like to see as well as better preparing them for learning. So, they are critical investments, particularly for low-income children who may not have access to adequate nutrition elsewhere, to help them develop properly, stay healthy, and be ready to learn at school.

Senator KLOBUCHAR. Okay. Thank you.

Could you comment, also, on the potential cuts to the child nutrition programs under the fiscal year 2016 budget resolution that we have just been talking about on the floor, Ms. Neuberger?

Ms. NEUBERGER. I mean, broadly speaking, we would be very concerned about the consequences for low-income families in that agreement. That is not specific to these programs, but across the programs that families rely on when they are struggling to feed kids or make ends meet.

Senator KLOBUCHAR. Yes. Just one last thing, back to the WIC Program that we just talked about. As it plays a critically important role in promoting the health of pregnant and postpartum mothers as well as young children. The continued success of the program is contingent on sound cost control, and I understand that States that are given flexibility to develop their own food list based on USDA's minimum standards, and yet some of the States leave lower-cost products off the list of approved foods. Without dictating to States their WIC food list, how can we incentivize States to consider cost controls when determining approved food items?

Ms. NEUBERGER. Just to be clear, WIC is a Federal program. Most of the rules are Federal. There are certain areas where there is State flexibility. States have a built-in incentive to contain costs in WIC——

Senator KLOBUCHAR. Because they have limited——

Ms. NEUBERGER. —because they get a limited amount of federal funds. So, the more efficiently they can use that money, the more people they can serve, and that has been very motivating. WIC is a very cost effective program. WIC costs have increased at about half the rate of inflation over time. It is a very sound investment and States have played an important part in that. So, the way the program is structured really contributes to that incentive structure.

Senator KLOBUCHAR. Thank you very much.

Mr. Lord, did you want to add anything for any of these questions?

Mr. LORD. Not on the WIC, no, Senator. Thank you.

Senator KLOBUCHAR. Okay. Very good. Thank you very much, and I am glad you are here. It is a very important topic, and as I said, the last bill that Senator Stabenow was involved in, and I know Senator Roberts on the committee and now leading the committee, I think was very important and we have made some great strides and we need to continue improvement in the nutrition standards. Thank you to both of you.

Chairman ROBERTS. Senator Tillis.

Senator TILLIS. Thank you, Mr. Chair.

Ms. Neuberger or Mr. Lord, I want to look back at the program. I am from North Carolina. I was Speaker of the House and I

worked a lot with the various school systems. We have 115 school systems in North Carolina. They seem to be both supportive and against certain components of the food nutrition programs in terms that they like the potential benefits, but they do not like the overhead, or they do not necessarily like how the regulations required them to implement the nutrition programs.

Has there been any work done to try and figure out how we can measure outcomes, and that is a question I had for you, Mr. Lord. I know that you and the GAO are evaluating the verification process, making sure the people who are entitled to it get it and those who do not do not, but what about the more fundamental question of the baseline when this program started, the year over year improvement in outcomes, which at the end of the day is the children's health and making sure that they are fed. Are we measuring those outcomes in a scientific way and identifying best practices and intervening when they are compliant with the program but not producing positive outcomes?

Mr. LORD. Well, I know Ms. Neuberger is probably more well versed on that. But, in terms of the outcome measures for the verification process, that was one of our suggestions to USDA. They are collecting—they have recently started collecting a lot of good information on the so-called "for cause" verification process, but they mix it together with other reporting, so it is unclear to us what the outcomes of all their efforts to conduct "for cause" verifications, and those are reviews of questionable applications. So, at least in that one area I am very familiar with, there is broad agreement they need to do a better job in looking at outcome measures in that area. That is verification related, and perhaps Ms. Neuberger can comment on the broader nutritional outcomes.

Senator TILLIS. Ms. Neuberger.

Ms. NEUBERGER. Sure. There is generally quite a lot of research on the positive benefits of these programs. In particular, for example, children who eat breakfast at school have been shown to have fewer behavior issues, less absence and tardiness, and better performance at school. So, that is a clear area where there is a strong tie between participating in the meal programs and the kind of educational outcomes we would like to see in schools.

Senator TILLIS. One question I have, I do not know if it is anecdotal or something that we need to look at more, but you hear the stories of putting—I am not going to pick a vegetable, because I always make a segment of agriculture mad when I do—but let us just say a vegetable that, for whatever reason, kids do not like yet, and administrators are concerned that they are satisfying the letter of the regulations, but a lot of that goes into the trash. Do we have any data to get beyond anecdotal to where there may be something else you could put on that plate to make sure the young person's belly is full and more efficient with what we are putting on their plate?

Ms. NEUBERGER. I hope that you will ask that question in the second panel, because we have some program operators who——

Senator TILLIS. I am going to. I just do not know if I am going to be here, so I thought I would at least get it out.

Ms. NEUBERGER. Right. There is research on the extent to which children are eating the meals. This is not an area that I focus on,

so it is not my expertise, but it has shown that there is less waste under the new rules than there was previously, and there is certainly always room for improvement. But, it is important to know that things seem to be moving in the right direction in terms of figuring out how to get kids to eat healthy foods.

Senator TILLIS. I think that is one of the concerns expressed by a lot of the people. I met with some members of the School Boards Association and Superintendents Association. That seems to be a concern that they have expressed and I think it is an area we need to investigate. In the next panel, I hope I am here so that I can brag a little bit on our farm-to-school initiatives in North Carolina, because we have been very aggressive in that area and I think it is very beneficial. We need to do more of it, convince those kids that Brussels sprouts are actually really good, particularly when they know where they came from.

But, I am going to hold and allow us to move to the next panel and reserve my questions for that panel. Thank you.

Chairman ROBERTS. Well, Senator Tillis, I have been known to eat a Brussels sprout or two, but always with cheese on it.

[Laughter.]

Senator TILLIS. Mine is with bacon.

Chairman ROBERTS. Well, with bacon and cheese, it might work out, but I have problems with the cheese, too, but then that is another whole nut. We do not want to go there at this particular time.

[Laughter.]

Chairman ROBERTS. Senator Heitkamp.

Senator HEITKAMP. Thank you, Mr. Chairman, and thank you for this important hearing. Making sure our children have every opportunity to succeed is something I think the entire committee believes in, and this is a good place to start, when we are talking about child nutrition and basically giving them the opportunity to grow up healthy and learn throughout the day.

Nutrition standards set in the Healthy, Hunger-Free Kids Act, I think, are an important first step to help create a healthier and more prepared next generation. But, we should also make sure that the schools have the tools they need to provide healthy meals.

In North Dakota, 100 percent of our schools, I am proud to say, are meeting the standards, and a couple months ago, only one school had asked for a waiver on the whole grain pasta requirement. So, that is pretty incredible in a State that has a fairly high rate of problems as it relates to obesity.

However, the Pew study found that 74 percent of North Dakota's schools still need at least one piece of school equipment, kitchen equipment, in order to meet the standards, and Senator Collins and I have introduced a bill to help schools purchase new equipment and provide them with technical assistance on food preparation and meeting the standards. I just want to put a plug in for the School Food Modernization Act, which I think will give the tools to many of our people who serve our children every day, and by that I mean literally and figuratively, the equipment and the tools that they need. This is especially important in rural schools, where the school districts are already strapped, where you have a small population but a huge need for upgrading.

I have said it many times. My mom was a lunch lady, so I am especially partial to the School Lunch Program. I know what that had meant. I know what she did every day to try and put nutritious and good food on the table. I also knew that there were kids that I went to school with where that may have been the only meal that they got all day. She took that responsibility seriously.

We have been talking a lot, Mr. Lord, about program integrity and making sure people who should not be participating in the program are not. Obviously, the surfer dude hit the news last year in a big way. But, Ms. Neuberger noted that one in four applications were denied despite actual household circumstance. We are wondering, as we close the loophole and make sure that we do not have fraud in this program, how can we make sure more kids get into this program who actually need these nutritious meals, who actually need that backpack going home on the weekend?

Mr. LORD. Well, I think you need to raise awareness and perhaps do additional outreach at the school district level. I think there is good awareness of the program, but in some pockets, perhaps there is not. So, that is part of your outreach campaign for the program. You always want to be sure those who are deserving are in the program, but——

Senator HEITKAMP. So, we have done outreach. I am looking for a new solution.

Mr. LORD. Well, that is probably, in my humble opinion, Senator, that is something that the next panel could probably better address. They are obviously working at the local level and they probably have really good perspective on that. I have the global view.

Senator HEITKAMP. But, I think you take my point seriously, which is we have fraud, but we also have a lot of kids who go home hungry and that has got to be part of this discussion.

Ms. Neuberger, can you suggest any ideas on how we can expand awareness or how we can expand participation for children who go hungry?

Ms. NEUBERGER. Sure. Awareness is certainly an important part of it, making the programs accessible and making sure they stay that way. So, we have focused quite a lot on the ways that you can improve accuracy and make sure the programs are working as they should. It is important at every step of the way to make sure that you are not putting barriers in the way for families who qualify for the programs and need the benefits. That balance is an important way of making sure that the programs remain available to students.

Some of the approaches we talked about earlier, of relying on data from other programs, the community eligibility provision, where very high-poverty schools can serve meals at no charge to all students, are ways to make it easier for low-income families to get those benefits.

Senator HEITKAMP. Thank you. I yield the rest of my time.

Chairman ROBERTS. Thank you, Senator.

Senator Brown and Senator Bennet have questions for the next panel, so I think, unless I am mistaken, this concludes the contributions from the first panel. Thank you so much for coming and thank you for your very valuable testimony.

If we could now have the second panel please come forward.

[Pause.]

Chairman ROBERTS. I think, in the interest of time, we are going to introduce all of the witnesses. Each one, of course, deserves their timely moment of fleeting fame before the committee.

We would like to welcome Mr. Brian Riendeau. He joins us today from Louisville, Kentucky, where he is the Executive Director at Dare to Care Food Bank. Earlier in his career, Mr. Riendeau also led Government and Community Affairs for the KFC Corporation—I think everybody understands who that is—and served as a Legislative Assistant for Senate Majority Leader—let me see, that would be Mitch McConnell, would it not?

Senator STABENOW. Oh, I cannot remember.

Chairman ROBERTS. You cannot remember? All right.

[Laughter.]

Chairman ROBERTS. Thank you for being here today. We look forward to your testimony.

Mr. Richard Goff of the Office of Child Nutrition from West Virginia and their Department of Education is next. Mr. Goff joins us today on behalf of the West Virginia Department of Education, where he has served as Executive Director of the Office of Child Nutrition since 2005. He has 26 years of experience with the West Virginia Department of Education, including work with the Child and Adult Care Food Program. In his current role, he oversees development of policies and program administration related to all child nutrition programs. Welcome. I look forward to your testimony, sir, and your insight.

Ms. Cindy Jones of the Olathe Unified School District 233. I am especially happy to introduce to the committee Ms. Jones, who serves as the Business Management Coordinator for Food Service at the Olathe Public Schools in Kansas. She has worked for the Olathe Public Schools Food Service for over 20 years. She started at 17, as I recall.

[Laughter.]

Chairman ROBERTS. She currently serves as the Public Policy and Legislation Committee Chair in the School Nutrition Association of Kansas and has also served as Vice President and President. I certainly look forward to Cindy's testimony and her insight.

Dr. Sandra Hassink, who is President of the American Academy of Pediatrics. She currently serves as President, and hails from Wilmington, Delaware. The doctor has focused her career on preventing and treating obesity in children. She is a pediatrician at Nemours Alfred I. DuPont Hospital for Children, where she founded the weight management program in 1988, serves as the Director of the Nemours Pediatric Obesity Initiative. The doctor began her medical career at the Vanderbilt School of Medicine as one of only 12 women in her graduating class. Thank you for being here today.

I look forward to all of your testimony. We will start with you, sir, Mr. Riendeau.

STATEMENT OF BRIAN RIENDEAU, EXECUTIVE DIRECTOR, DARE TO CARE FOOD BANK, LOUISVILLE, KENTUCKY

Mr. RIENDEAU. Thank you, Chairman Roberts, Ranking Member Stabenow, and the members of the committee. Thank you for inviting me here today. I am honored to represent Feeding America's

network of 200 food banks that serve more than 46 million people in need, including 12 million children.

Dare to Care Food Bank works with more than 300 agencies across 13 counties in Kentucky and Indiana. Our service area spans nearly 4,000 square miles and includes urban, suburban, and rural areas.

I am here today to tell you that child hunger is real, real in the communities we serve and it is real across this great country, and it is a particularly stark reality when children are not in school. But, I am also here to tell you today that we can solve child hunger. Through innovative public-private partnerships and strong Federal nutrition programs, we can ensure all children have access to enough food for an active and healthy life. I am here to ask you to help us make good programs even better.

Food banks like mine cannot do our work without the Federal Summer Food Service Program and the Child and Adult Care Food Program. If certain changes were made to these programs, we could reach even more kids in need.

My food bank provides more than 1,000 hot meals a day to kids throughout the year. Children who visit our partner sites will not only receive a nutritious meal, but they will have a safe alternative to being on the streets. They get tutoring, mentoring, and sports. But, far too many children cannot reach summer and after-school meal programs, particularly in the summer. In fact, the Summer Food Service Program in my State reaches less than ten percent of the low-income kids and only 18 percent nationally.

Why is that? Well, at Dare to Care, our programs are concentrated in Jefferson County, an urban county where summer programming and services are available and where many of our children can get to sites. The current summer feeding model, which requires children to consume meals at a designated site, works great in these instances where children have already congregated for tutoring and mentoring.

However, we face two challenges in reaching kids in our more rural communities, lack of sites and transportation. Those communities simply lack facilities where kids can congregate and consume a meal, which makes the on-site feeding requirement difficult or impossible to comply with. Even schools in those counties that try to provide summer feeding report low participation rates because kids are not able to travel to the site each day.

There are several policy changes that you can make that would help Dare to Care Food Bank reach more kids during the summer and after school, and we believe it will require a two-part strategy. First, we need to strengthen the site-based model by streamlining Federal programs and making it easier for community providers to expand the number of sites available to children. Currently, we have to operate two different Federal programs, one during the school year and another in the summer, even if we are serving the same kids the same meals at the same sites year round. Moving to one program will allow us to focus on feeding kids and not pushing paperwork. Additionally, lowering the area eligibility threshold from 50 percent to 40 percent will expand the number of sites available and align SFSP eligibility with other federally funded youth programs.

Second, no two communities are the same. We need to continue to maintain strong national standards and accountability while providing new program models that local communities can tailor to best meet their circumstances to really make progress in closing the summer gap. Dare to Care currently runs privately funded programs to fill this gap. Our backpack program in rural communities provides children with nutritious foods on the weekends and in the summer, but limited resources mean that we cannot provide a backpack to every kid who needs one.

We have also looked into mobile summer feeding programs, but our rural communities are so small and far apart that the time requirement of having kids eat a full meal before we can go to the next location, as required, would limit the number of children we serve and, therefore, be cost prohibitive. Waiving the congregate requirement to allow innovative program models in hard-to-reach areas will address these barriers and significantly expand the number of children we reach.

Finally, the summer EBT demonstration projects provide another model that has been effective at both reducing food insecurity and increasing nutrition. In this model, families of children receiving free or reduced price school meals are given an EBT card to purchase food at retail stores during the summer. We would like to see this program significantly expanded in communities that have high need and are particularly difficult to reach.

I would like to close by saying that I am convinced that child hunger is a solvable problem. It is going to require collaboration between government, business, and nonprofit stakeholders, and we are counting on you to make closing the summer hunger gap a top priority in the child nutrition reauthorization and to give food banks like mine the tools we need to serve every hungry child.

I thank you for this opportunity to testify and I am happy to take questions.

[The prepared statement of Mr. Riendeau can be found on page 101 in the appendix.]

Senator BOOZMAN. [Presiding.] Thank you.

Mr. Goff.

STATEMENT OF RICHARD GOFF, EXECUTIVE DIRECTOR, OFFICE OF CHILD NUTRITION, WEST VIRGINIA DEPARTMENT OF EDUCATION, CHARLESTON, WEST VIRGINIA

Mr. GOFF. Thank you for the opportunity to be here today. I am the State Director in West Virginia and I would like to give you my perspective of the last two reauthorizations and how we implemented them at the State agency level.

In April of 2007, the IOM released the report, "Nutrition Standards for Foods in Schools." Nine months later, West Virginia adopted those standards in our Standards for School Nutrition Policy. The progressive standards were implemented in the cafeteria and outside the cafeteria. We required schools to have more fresh fruits and vegetables. We also implemented the skim and one-percent milk provision. Our sodium standard was 1,100 milligrams of sodium, which is a little bit more stringent than the tier one requirement. We also adopted the whole grain rich standard, and this was all back in 2008.

We do not permit a la carte sales in West Virginia. When children enter the cafeteria, they get a unitized meal that meets the meal pattern for USDA. We just felt that it was the right thing nutritionally for the student and financially for the school district.

Also, outside the cafeteria, we implemented the competitive sales rules that the IOM recommended for all foods sold, served, and distributed to students during the school day. We removed soft drink machines and sugary sweetened beverages. Junk food machines, vending machines, and school stores had to meet the nutrition standards set forth by the IOM.

We also addressed healthy fundraising and required that if in-school fundraising was to occur during the school day on school property, that it had to meet the nutrition standards, as well.

We also instituted the professional standards at the time and had a staffing requirement whereby we required continuing education hours and a certain level of a degree for the food service director at the district level.

Additionally, we did something different, as well. We addressed the food coming in from outside sources. We had done everything that we could to ensure that the school environment was a safe and healthy learning environment in the cafeteria and throughout the school environment, yet we were turning a blind eye to what was coming in the back door in the form of parties and things of that nature. So, we instituted a provision to address that, as well.

In 2010, in anticipation of the Healthy, Hunger-Free Kids Act, we redirected our focus on the technology and we developed a State-wide automated electronic system whereby every public school in West Virginia uses the same point of sale software. Students that come through the public school system in West Virginia a lot of times will just put their finger, their index finger, on a biometric scanning pad and it logs and categorizes the meal. That has increased efficiency and accountability in the program and has dispensed with a lot of the over-claiming problems that other school districts were seeing.

The direct certification match when you have a Statewide system like this, it is done at the State agency level. We do the direct certification match as well as the determination for community eligibility at the State agency and we push the data down to the schools. Once schools figure their claim for reimbursement, that data is loaded up to the district level and then pushed to the State agency level. So, the interface goes both ways, from the State agency to the school, from the school to the State agency.

By doing that, we were able to have Statewide eligibility. So, as needy families typically move around throughout the State, what we were able to do is focus on ensuring that their meal eligibility benefits were not interrupted. No longer were they required to submit an application at the new school district. Eligibility followed them, just like their name or their student ID did.

This also made it easy for us to monitor the system and improve efficiency and the integrity of the system. The three-year monitoring cycle, when we went from a five-year to a three-year, was not a burden for us. Fifty percent of our monitoring is completed in our office, at the central office at the State agency level in Charleston before we even enter the field. We have a great rela-

tionship with the SNAP and TANF and foster child folks to get that data electronically. Direct certification is then uploaded on a weekly basis.

We also piloted the second year community eligibility. The first year, West Virginia was not selected, but we did it anyway. We piloted it at a State agency level on something called the West Virginia Universal Free Meals Pilot Project. CEP is very alive and thriving in West Virginia. Fifty-four percent of all of our public schools are community eligible in West Virginia, and I am very proud of that.

The key to that working was an Act that we brought about called the Feed to Achieve Act that was enacted, our State legislature passed, that realigned school breakfasts with the instructional day. I am about to run out of time. The Act passed without a fiscal note and actually built upon the programs that we already had in place and ensured that all children would receive at least two reimbursable meals per day.

Thank you, and I will take questions.

[The prepared statement of Mr. Goff can be found on page 52 in the appendix.]

Senator BOOZMAN. Thank you.

Ms. Jones.

STATEMENT OF CINDY JONES, BUSINESS MANAGEMENT COORDINATOR, FOOD PRODUCTION FACILITY, OLATHE UNIFIED SCHOOL DISTRICT 233, OLATHE, KANSAS

Ms. JONES. First, I want to thank you for inviting me here today to testify. School nutrition professionals across Kansas are working hard to ensure children receive the nutrition required for their health and academic success. Hungry children simply cannot learn and thrive.

Olathe Public Schools is the second largest school district in Kansas. I am responsible for all financial aspects of our nutrition programs. Our department has 275 employees serving 24,000 meals per day on a $12.5 million budget. Twenty-seven percent of our students receive free or reduced price meals.

At Olathe, we are committed to delivering nutritious meals. Thanks to our universal free breakfast in the classroom program in five elementary schools, we are serving 850 more healthy breakfasts each day, resulting in fewer tardies and absentees and better behavior as students are no longer complaining about being hungry. We also participate in summer feeding, serving 1,900 meals per day. Expanding access to these critical services has helped our program remain financially sound while providing the nutrition that is vital to our students.

Even before the Healthy, Hunger-Free Kids Act, school nutrition professionals had been working hard to improve school menus. In our district, we have offered unlimited fruits and vegetables, served whole grains, and meet limits on calories and unhealthy fats by reducing sodium.

However, we faced many challenges. Under the new rules, many students are now bringing meals from home. Our elementary school participation has dropped more than nine percent, and at

the secondary schools, revenue has dropped as many students have stopped purchasing a la carte choices.

Almost all the students leaving the lunch program are paid students. If this trend continues, the school cafeteria will no longer be a place where all students go to eat, but rather a place where poor students go to get their free meals. We have worked for years to fight this stigma, so it is heartbreaking to see our progress decline.

Kansas students are leaving the program for a variety of reasons. Paid lunch equity mandates forced many schools to raise lunch prices. Many families do not qualify for meal assistance, but are struggling financially. As we continue to raise prices, some will no longer be able to afford to eat with us and the financial losses may force our program to cut staff, so they are impacting the community

Smart Snacks rules have led to huge declines in a la carte sales, too, with an estimated loss of $700,000 in revenue. Items such as our fresh to go salads had to be taken off the menu because the small amounts of meat, cheese, and salad dressings do not meet the sodium and fat requirements. Our sub sandwich was a very popular a la carte item, but to meet the rules, we had to shrink their size, remove the cheese, and switch to whole grain bread. Now, we sell very few.

We also have opportunities to serve diet soda, sugar-free gum, and coffee. We have chosen not to serve these items, but it just shows you how these regulations do not always make sense.

Despite our best efforts to make meals more appealing, we are struggling with student acceptance. We are particularly challenged to find whole grain-rich tortillas, pizza crust, and other specialty items that appeal to our students.

Every student must now take a fruit or vegetable with their meals, whether they intend to eat it or not. As a result, we have seen an increase in good food going to waste in our schools. We promote fruit and vegetable choices with free samples and "I Tried It" stickers to encourage consumption, but forcing students to take fruits and vegetables turns a healthy choice into a negative experience. Encourage and educate instead of require is always the best option.

Olathe Schools' meal program is self-supporting and operates on a tight budget. After labor and supply costs, insurance, utilities, and equipment and other expenses, we are left with just over a dollar to spend on food for each lunch tray. Imagine going to the grocery store with just five dollars to spend for a family of four, including milk, fruit, vegetable, and a healthy entree. Could you do that every day of the week?

My involvement in the School Nutrition Association of Kansas has allowed me to witness the accomplishments and the challenges of colleagues all across Kansas and Missouri. Some districts have overcome challenges under the new rules, particularly those with high free and reduced price eligibility, which provides higher reimbursements and participation and access to Federal grants and programs. However, many districts like Olathe are struggling with reduced revenue, declining participation, and the higher cost of preparing meals. We do not have access to many Federal grants.

That is why it is vital to allow flexibility, so all programs can be successful for the students and families we serve. There is a lot of negative press about school nutrition programs asking for flexibility. To me, this is very hurtful. We are only asking for flexibility to ensure all school nutrition programs are successful. Have faith in the knowledge that all school nutrition professionals want the very best for America's children. After all, they are our children and grandchildren, too.

Thank you for the opportunity. I will take any questions.

[The prepared statement of Ms. Jones can be found on page 66 in the appendix.]

Senator STABENOW. [Presiding.] Yes.

Dr. Hassink.

STATEMENT OF SANDRA G. HASSINK, M.D., PRESIDENT, AMERICAN ACADEMY OF PEDIATRICS, WILMINGTON, DELAWARE

Dr. HASSINK. Thank you and good morning, and I would like to thank Chairman Roberts and Ranking Member Stabenow and the members of the committee for inviting me here today.

As I was introduced, I am Dr. Sandra Hassink and I am President of the American Academy of Pediatrics, a nonprofit professional organization of 62,000 primary care pediatricians and pediatric medical and surgical sub-specialists whose mission it is to attain the optimal physical, mental, and social health and well-being for all infants, children, adolescents, and young adults. It is an honor to be here today speaking about a subject to which I have dedicated my life's work, childhood obesity and the connection between nutrition and health.

The foundations of child health are built upon ensuring the three basic needs of every child: Sound and appropriate nutrition; stable, responsive, and nurturing relationships; and safe and healthy environments and communities. Meeting these needs for each child is fundamental to achieving and sustaining optimal health and well-being into adulthood for every child.

Early investments in child health and nutrition are crucial. The time period from pregnancy through early childhood is one of rapid physical, cognitive, emotional, and social development, and because of this, this time period in a child's life can set the stage for a lifetime of good health and success in learning and relationships, or it can be a time of toxic stress when physical, mental, and social health and learning are compromised.

Micro-nutrients, such as iron and folate, have demonstrated effects on brain development, but are commonly deficient in pregnant women and young children in the United States. These deficiencies can lead to delays in attention, motor development, poor short-term memory, and lower IQ scores.

One of the most effective investments Congress can make during the prenatal to school-age period is to support the Special Supplemental Nutrition Program for Women, Infants, and Children, or WIC, and I thank the committee for its strong bipartisan support for WIC over the past four decades. WIC helps give children a healthy start at life by providing nutritious foods, nutrition education, and breastfeeding support. 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.

WIC has also played an important role in promoting breastfeeding and improving breastfeeding initiation. We recommend that the committee seek to find ways to promote breastfeeding initiation and continuation even further in the WIC program, including by an increase in the authorization for the Breastfeeding Peer Counseling Program for $180 million.

WIC is a targeted intervention for mothers and young children with impacts that can be long-term in nature, including improved health outcomes, educational prospects, and the prosperity of our communities. As a pediatrician, I have seen firsthand the importance of nutrition in child health.

When I started my practice in childhood weight management 27 years ago, I was seeing adolescents. When I retired last October, I had a special clinic for children under five with obesity, and we were seeing infants. These children were already showing the effects of their increased body mass index on blood pressure and measures of blood sugar control. We saw obesity-related liver disease in four-year-olds and in children with pre-diabetes at age six.

Today, our children are experiencing an unprecedented nutritional crisis resulting in the double burden of food insecurity and obesity. The connecting factor for both is poverty. The highest rates of obesity are found in people with the lowest incomes, and increasingly, the picture of food insecurity in children is that of a child with overweight or obesity consuming a poor quality diet. Good nutrition is not only an essential component of chronic disease prevention and treatment, it also helps treat the effects of chronic hunger.

WIC is just one intervention to address the double burden. Families, our schools, child care communities, and certainly pediatricians play an important role in shaping healthy habits. When you are in the middle of an epidemic, you cannot keep doing what you have always been doing. As pediatricians, parents, community leaders, and policy makers, we have an obligation to ensure that the food we provide our children is healthy and nutritious and that we model healthy eating as adults.

Good nutrition in childhood sets the stage for lifelong health, and just like we vaccinate to protect against illness, we can also vaccinate against chronic disease by providing pregnant women and children with nutritional assistance and breastfeeding support.

As we celebrate our mothers this weekend, I urge the committee to put mothers' and children's nutritional needs first. Our children's health simply cannot wait.

Thank you, and I will be happy to take any questions.

[The prepared statement of Dr. Hassink can be found on page 58 in the appendix.]

Senator STABENOW. Thank you very much. We will proceed with questions. I know the Chairman will be returning in just a moment.

So, thank you to each of you for your comments. We very much appreciate them, and Dr. Hassink, thank you very much for reminding us all what this is really about in terms of children and

health and the stake we have in children being healthy and having a chance to succeed.

Mr. Goff, I wanted to start with you, because when I think of West Virginia, you have all kinds of schools, you have rural, you have urban, and yet your State is 100 percent compliant with the new meal standards, including Smart Snacks. It looks like you were ahead of the game, anticipating things. I want to congratulate you and the State for that, and I am wondering how you were able to help your schools in the State to be able to achieve the goals. Secondly, when many schools rely on the a la carte sales to supplement their budgets, and we understand tight budgets for schools, but the change to healthier items does not seem to have impacted your schools. So, how did you help schools be able to achieve and how is it you were able to do that, including a la carte sales, in a way that did not hurt your schools?

Mr. GOFF. Okay. Thank you for the kind comments. When we adopted the IOM standards in 2008, right after they were released, and we put together a very comprehensive implementation plan, as far as bringing the schools on board, we went through the black eyes like everyone else is going through with the Healthy, Hunger-Free Kids Act, but we used quarterly workshops. We created a Listserv where we could communicate with each food service director through the Internet with the push of a "send" button. We issued guidance memos. We met with principals' groups. We met with superintendent groups. We did presentations before boards to get the word out and let them know just why the standards were changing, why we were doing what we were doing, and the science behind it. We created a website called Smartfoods for parents, to educate parents of all the changes.

So, we have had a very comprehensive implementation plan, and we staffed at the State agency level in preparation for all the changes, as well, as far as grant writers and registered dieticians and things of that nature. Our automated system, where we have an electronic technology system, point of sale system, that is integrated throughout the entire State. They just need to know one system. Our reviewers go into the schools. They just have to monitor one system.

Many of the concerns that Mr. Lord spoke of, we do not experience in West Virginia because of the direct certification and community eligibility determination is done at the State agency level and we notify the schools of that information. Our free and reduced application is online, so we have had a lot of the problems that we experienced with the paper application, which has basically become obsolete in West Virginia.

As far as a la carte, we in West Virginia—when children come into our cafeterias, they either get a unitized meal that meets the meal pattern that is fully reimbursed by the Federal Government regardless of whether it is free, reduced price, or paid, and we just felt that that is in the child's best interest. We also worked to have salad bars put in place.

Now, by not offering a la carte sales, that makes the point of sale a lot cleaner. There is not a lot of activity at the point of sale. So, that lends itself to increased accountability as far as logging and claiming the meals.

But, we have never had an issue with—as far as the revenue goes on a la carte sales. You get a unitized meal, which you get the full price of the paid meal, and then you get the full Federal reimbursement, so you get both revenue streams in West Virginia. With a la carte, that was never an issue for us.

Senator STABENOW. Well, it is very impressive, what you have done, and when you look at the automated point of sale and the Statewide eligibility so that the schools do not have to be focused on that and it moves with the child, I just think that is really something that we need to look at and how we can save the costs and the paperwork for schools and families and still achieve things. So, congratulations.

Mr. Riendeau, we have had a lot of bipartisan support over the years for our summer meals programs and we want to continue that. We know we need to strengthen both the congregate and non-congregate models. I am concerned that we create more flexibility. In Michigan, we have submitted a request for a waiver for the congregate requirements, and, in fact, unfortunately, it was denied because of the current restrictions when a waiver can be issued.

So, I wonder if you might speak a little bit more about the need for flexibility in terms of the summer and what is happening in terms of communities, whether it is on where children meet or what has been called grab and go or other kinds of models, why this is important.

Mr. RIENDEAU. Sure. Thank you for that question. In our case, at Dare to Care, we serve both urban and rural counties, and I think that is where the difference between the two models is most stark. The vast majority of the meals that we serve through SFSP are served in Jefferson County, the home of Louisville. It is an urban county. It is a place where kids—there are plenty of sites for kids to gather in the summer, sites with programming and activities that the kids want to be a part of. The kids are there, and it is easy for us to get those meals to those kids, have the kids consume them on site, and allow us to comply with the requirement of that program.

In fact, we have—our model is based on a 6,000-square foot kitchen that we invested in to build two years ago that provides over 1,000 hot meals a day now and takes those meals to those sites, and the program works very well there.

Where the need for flexibility comes in is in our rural counties. Our other 11 counties are rather rural. Many of them are very rural. Frankly, they just do not have the community centers, the facilities for kids to gather. Even if they did have those, there is a transportation issue. These kids are spread out. Many of them are living in small communities. They are dispersed across those counties. In the summer, they do not congregate.

What we would like to see is the ability to work on the ground in those communities with government and business leaders in those communities to come up with unique partnerships and innovative programs that are tailored to meet the specific needs of those individual counties, and I think if we could have the flexibility that we are talking about here, I am very confident that we could reach many, many more of the kids in need.

As I mentioned in my testimony, 90 percent of the kids in the State of Kentucky who are eligible for SFSP do not get it because there is either no site for them to go to or they cannot get there.

Senator STABENOW. Thank you very much. Thanks.

Chairman ROBERTS. [Presiding.] Ms. Jones, Cindy, thank you for your help in our traversing Kansas and enjoying school breakfasts and school lunches. If you were provided with some—that word again—flexibility, what changes would you make?

Ms. JONES. I would go back to serving 50% whole grain rich products. This would give us the flexibility to add back some of the student's favorite items. Two items that we are struggling with are whole grain biscuits because they have no flavor and crackers that taste like sawdust. Just some simple changes would make a big difference. Also all children love chicken nuggets, however the children do not like the new chicken nuggets because of the taste of the breading.

I would go back to encouraging kids to take fruits and vegetables, which is what we have always done in our district. We keep hearing about, it is just half-a-cup, but we have 29,000 students in our district. That is a lot of half-a-cups, and if two-thirds of those kids eat the fruits and vegetables, that is still 10,000 half-a-cups that we throw away, and over a year, that is 1.7 million half-a-cups.

In our district, we want the kids to eat their fruits and vegetables. We love our unlimited fruits and vegetables. We encourage our students by giving them "I tried it" stickers, because we want them to eat their fruits and vegetables. But, because of all the tight budgets we are having right now, we may have to discontinue the unlimited fruits and vegetables. I would hate for the students that want to eat their fruits and vegetables to lose that opportunity because other students are forced to take them and just throw them in the trash.

Also, I would like to be able to make the decision on whether to raise the prices for our meals. I think a lot of our students are leaving the program because they can no longer afford to pay the meals prices. I was visiting with a little girl the other day and she shared with me that her mother now makes her choose two days a week to eat with us because they can no longer afford to pay the costs. So, I would like for district to be able to determine their own meal pricing.

Chairman ROBERTS. We have just been joined by the whole grains champion of the Senate, who has a bill to exempt that standard, and I will give you every opportunity to discuss that, Senator Hoeven.

But, at any rate, let me also ask you, in my travels throughout Kansas, there were some schools doing well in implementing the standards and they seemed to be the schools, obviously, with a lot of resources. In your testimony, you mentioned that some high free and reduced-price districts in Kansas have also overcome challenges. Is there a way to characterize the districts that are having a hard time, or does it vary based on the individual community?

The reason I am bringing this up is that I think the distinguished Senator from Michigan and I tend to pay special attention to rural and small town schools.

Ms. JONES. Right.

Chairman ROBERTS. Goodness knows, they have problems with a lot of things. But, I am not sure I am getting this exactly right. Is there a way to characterize the districts that are having a hard time, or does it vary based on the individual community and what they are doing, how they accept a program, et cetera, et cetera?

I know there has been a lot of talk about training. I am trying to get at something here. I do not want to call it the attitude of the community or the attitude of the district or whatever—not much choice in this regard. But, help me out here.

Ms. JONES. What I am seeing, districts like my own are struggling the most. We have a lower amount of free and reduced, so a lot of our students are choosing to bring their own lunch if you are at a district where there is a high amount of free and reduced, those children will continue to eat what they are being offered.

I was actually speaking to a director from a larger district and he shared with me that because of the revenue that he is losing, he will end up in the red for the first time. This is his tenth year working in his district. I believe that a lot of the problem is the schools that do not have the high free and reduced student, are unable to qualify for grants that are available to the schools with a high amount of free and reduced students.

In my district, we have a centralized building and two registered dieticians on staff. We have to pay for all of our costs. We even pay indirect costs to our districts to help pay for the utilities and the custodial staff at the schools. Small school districts nutrition programs are housed within one of the schools, so they do not have all the extra costs that large districts have. Plus, many of them have high free and reduced percentages. So, they not only have less expenses, they also have more funding available to them.

Chairman ROBERTS. Well, you have given me the exact reverse of what perhaps some of us may have as a bias and I truly appreciate it. That is exactly what I was asking about.

I have so many different questions here, but I do want to get to Senator Donnelly, who I think is next, and then we have Senator Hoeven.

Senator DONNELLY. Thank you, Mr. Chairman. I want to thank all of you for being here.

Mr. Riendeau, I know you are based in Louisville, but I want to let everybody know that you also—Dare to Care serves Washington, Crawford, Harrison, Floyd, and Clark Counties in my home State of Indiana. We are grateful to you for that. I wanted to talk to you for a second about something that I know you have heard about, as well, and that is the area that you serve, just outside of it is Scott County, which is just to the north of where you serve, and we have had a devastating HIV outbreak there and drug epidemic there. The county also has one of the highest food insecurity rates for children in our State. I was wondering, in your mind, what is the best way to reach those kids, to make sure they have had enough to eat, to make sure they stay in school and, hopefully, stay away from drugs, as well.

Mr. RIENDEAU. Thank you, Senator. Yes, I live just down the road from Scott County, and I just want you to know, personally, I share your pain with what is happening there. It is horrific.

You know, I guess I think in my mind, what is happening there sort of points to the larger issue that is before the committee with this whole reauthorization, that is, investing in our kids today can prevent so many issues down the road. We heard that kids who grow up in a food insecure environment are going to have all kinds of issues, and as they age up, they are going to find themselves with less options for becoming productive, self-sufficient members of our community. I am certainly not an expert on drug addiction or HIV, but I would have to guess that there is a very close correlation between the levels of food insecurity that you see in that county and some of the problems that folks are facing with no alternatives to turn to.

I think the best way that—one of the great ways that we could better serve counties like Scott would be going back to the Ranking Member's question about flexibility, giving us the ability to tailor programs to be able to provide summer food to kids in those rural counties where the current model and the current regulations may not fit so well.

Senator DONNELLY. Which ties in a little bit to my next question, which is that in some of our rural areas that you serve, and obviously throughout the rest of the State and in the country, there are Pack a Backpack programs for kids on the weekend and such. I know you help to work with that, also. Do you think that as you look at that, we would be able to reach more food insecure children if those meals in that program were eligible for reimbursement, as I know the funds come from the private sector for that?

Mr. RIENDEAU. Absolutely. That program is—in our case with Dare to Care and serving our rural counties, that is one of the programs that we do use to reach kids in the rural counties, because when kids are congregated at school, it is the one place we can get nutritious food to them to take home for the weekends.

Currently, we fund that program entirely with private donations, so it is an entirely privately funded program. But, in my mind, it is a great public-private partnership because we are leveraging those private dollars to help address an issue that we currently cannot address with Federal dollars.

So, the answer is yes. I think if we could find a way to involve—find a new revenue source that would allow us to provide more backpacks, that would certainly have a positive impact on our ability to reach those kids.

Senator DONNELLY. Thank you.

Dr. Hassink, one of the areas of concern for me with food insecurity is also the general obesity that has occurred in children and the increase in diabetes type 2. As you look at that and as we look at that going forward, what more can be done to teach about healthy eating, lifestyles, and how to prevent things like diabetes type 2, because they can be so debilitating.

Dr. HASSINK. Well, thank you, and certainly we, as pediatricians, are seeing the rise in type 2 diabetes in younger and younger children, something we never thought we would have to deal with as pediatricians.

I think starting very early with early healthy infant nutrition and transition to solid foods and good feeding practices are important. Healthy habits for families at home to start out right is essen-

tial. Many of the children who have severe problems in adolescence with their health, with type 2 diabetes, have already by age five have had obesity. So, early intervention. That means family education, stronger links with the health care system and food and providing information about food programs, providing education, understanding what is available for those families in the community, I think, would help get them off to a good start.

In 2007, when we wrote the expert guidelines for obesity, we considered all children at risk for obesity in this country and we have trained physicians to do preventive counseling for everyone because of this problem.

Senator DONNELLY. Thank you very much to the panel. Thank you for all your work to try to help our children and our families.

Thank you, Mr. Chairman.

Chairman ROBERTS. Thank you, Senator Donnelly.

Senator Hoeven.

Senator HOEVEN. Thank you, Mr. Chairman. I appreciate you holding this hearing today and thanks to all of the witnesses.

Ms. Jones, you mentioned in your testimony some of the difficulties in complying with the lower sodium standards and also the 100 percent whole grains requirement. What can we do to help in that regard? What do you think the solution is?

Ms. JONES. We just want to make sure that we do not go forward with target two for the sodium, right now we are able to get by. We are struggling, but we are able to meet those requirements. But, if we go on to target two, that would mean we are serving a therapeutic low sodium diet. There will be no flavor to the kids' food. I just received an e-mail from my director letting me know that our parent surveys are back and many of them say that their children are no longer eating with us because there is no taste to their food. That is a big concern, and if we continue on, I think that will be even a larger concern.

Senator HOEVEN. So, last year, I included a provision that actually kept the whole grains at 50 percent rather than having 100 percent of the grain products having to be whole grain enriched, and now I have introduced legislation with Senator King—this was bipartisan legislation, Senator King from Maine—that would both keep us at the lower sodium level, but not go to the next target level, and would continue the provision that 50 percent of the grain products have to be whole grain enriched. Is that something that you think is workable and that your State would find workable and that you feel other States would find workable?

Ms. JONES. Absolutely.

Senator HOEVEN. Okay. Then, touch on for just a minute issues as far as the competitive requirements for the a la carte menu. So, we want to make sure that the school lunches are healthy and the kids are eating them——

Ms. JONES. Right.

Senator HOEVEN. —and then we also want you to be able to continue with the a la carte, and I understand there are some issues in terms of what you can provide a la carte.

Ms. JONES. Correct. We would like to be able to serve items on a la carte that are also on the reimbursable meal, because right now, you have to look at each a la carte item. If it is a part of a

meal, you can compare that throughout the week and fit it into the requirements. So, it is much more difficult to be able to get an item to serve on a la carte menu. If we can serve it on a reimbursable meal, it should be healthy enough to serve a la carte.

Senator HOEVEN. Okay. So, again, just some flexibility there——

Ms. JONES. Some flexibility, absolutely.

Senator HOEVEN. Thank you.

Mr. Goff, I am glad to hear of your successes in terms of implementing the program in West Virginia, and certainly flexibility does not mean a rollback of good nutrition standards, but, again, making sure that we have healthy meals and meals that the kids will eat and that our schools are able to make their budgets. Could you tell me how many of your schools have applied for an exemption from the 100 percent whole grain requirement?

Mr. GOFF. Well, we did the 100 percent, the whole grain rich requirement back in 2008. The only thing that has affected our schools—and that was implemented across the board in all schools and schools are not having a problem with it. The only thing that has really touched in West Virginia is the—as it relates to pasta, and that is only because we have some schools that are having trouble getting the product.

Senator HOEVEN. Right. That is the point. In some cases, whether it is pizza or tortillas or pasta, I mean, when we talk about whole grain enriched, it is not just the bread and so forth. It is all these other products. Hence, some flexibility is helpful, and that is why I have advanced the 50 percent whole grain enriched.

You have had a number—I actually have the number. You have got quite a few schools that actually have applied for exceptions. Would not some flexibility be helpful to them here?

Mr. GOFF. Well, I cannot speak for the schools. I think that when you are looking at granting waivers, my fear of that would be that it would give industry a pause to come on board and make the products more available at a sooner time. We had lots of waiver requests when we were implementing some of our standards as it relates to professional standards or even competitive sales, and I think if you have a good standard that is in the child's best interest, then you hold that standard.

I certainly cannot speak for a State like Kentucky, but our participation in West Virginia in our school meals is the highest it has ever been. Our breakfast participation is starting to exceed that of lunch. So, I think in West Virginia—and we have cooperative purchasing groups that pool their efforts to get the product. I think we are on the right track there.

Senator HOEVEN. But, you—so, you do not feel there needs to be any flexibility, even though you have schools that have applied for exemptions?

Mr. GOFF. Well, I do not have—know the number of those schools——

Senator HOEVEN. Twenty-two.

Mr. GOFF. Twenty-two schools out of—and we have about 700. So, certainly, that is cause for an exemption, or a waiver until the product can become available. But, it was my understanding that it was more related to pasta.

Senator HOEVEN. I understand in some cases it relates to pasta or tortillas or some of these other products, and that makes sense, if they are healthy and the kids will eat them.

I will wrap up here, Mr. Chairman, but the current dietary guideline recommendations allow for some refined grains, as well. So, if we allow it in the dietary guidelines, which is for all Americans, why would not some flexibility in that regard make sense for school kids, too?

Mr. GOFF. I understand.

Senator HOEVEN. Thank you. Thank you, Mr. Chairman.

Chairman ROBERTS. Senator Stabenow, you had an additional question?

Senator STABENOW. I do. Thank you. I do have some, and thank you again to all of you.

I guess I am trying to put in perspective—I realize we are making changes in the last five years, and the behaviors are always hard to change where it is sort of in the process of moving in the direction, all of us, of wanting to be more focused on health and wellness, and we all know the benefits of that, and we know sometimes change is hard.

I do have to say, I have seen—I have visited a lot of school districts, some very creative, where you take the vegetable and you put green peppers and onion in the tacos and the kids do not even know they are getting it, which is great, and others where someone says, no, the government says you have to eat broccoli. So, there is a very different reaction depending on how things are presented, and we want to be in the creative process of that where we are sneaking it in and kids do not even know beans are a vegetable, right?

But, Mr. Goff, I wanted to ask you about specifically the exemptions for whole grains. My dear friend, and I really mean that, from North Dakota has been very passionate about this. But, yet, out of thousands of schools across the country, we have had only 350 requests for waivers on whole grains. To put that in perspective, 350 requests across the country, there are 900 school districts in Michigan alone. One request in North Dakota, four requests in Kansas. I am wondering, have you received very many requests at this point, and again, why would you believe your schools would not be asking for the flexibility of the waiver that we put in place at this point?

Mr. GOFF. Well, I could not give you the number. We have received some requests. But, it is my understanding in talking with the cooperative purchasing groups that comprise our State that the request is for pastas and it is because the product is not readily available for them to purchase, and it has something to do with that particular product has trouble maintaining its consistency. So, until more of that type product hits the market, some of our schools were struggling with it.

But, as far as the whole grain rich requirement, we have had that in place since 2008. Students are very accepting now of what they call the brown bread. So, I think it is a good standard and I think we just need to wait for industry to come up to speed.

Senator STABENOW. I am wondering, also, there are differences between larger and smaller districts and some that have the com-

munity eligibility, and as Ms. Jones was saying, just in larger districts with their smaller number of students that are qualified for free and reduced lunches and so on.

Again, in West Virginia, how do you handle that with a larger district where there is a smaller number of children and sort of the economics of that for schools, because I am sure that is different. So, have you—how have you handled that in terms of districts where virtually all of the children are qualifying for free and reduced lunch versus a district where it may be less than 50 percent?

Mr. GOFF. As far as——

Senator STABENOW. As far as sort of the economics of funding and so on, because that seems to be one of the concerns, is that——

Mr. GOFF. With community eligibility——

Senator STABENOW. —large districts are losing money because there are fewer children being reimbursed on free and reduced lunch and other children are not buying lunch.

Mr. GOFF. That is a great question, and we anticipated those types of things before we implemented community eligibility. Like I said, the first year that they piloted that, we were not selected, so we did our own version called West Virginia Universal Free Meals. We knew that if we just selected nine districts, or however many we did select, and said that you now can have breakfast and lunch at no charge, if we did not fundamentally change something, it was going to create a problem with their budget.

So, we worked in conjunction with our State legislature and we passed Senate Bill 663, called the West Virginia Feed to Achieve Act, and what that did, one of the provisions of that act, is it realigned breakfast with the instructional day. See, we were offering breakfast at the worst possible time, as most schools do, at the start-up of school, when the bell is ringing, the buses are arriving late, kids want to talk to their friends. So, we have a State law that mandates that school breakfast can no longer compete with the start-up of school. It has to be offered either breakfast in the classroom, breakfast after first period, or breakfast after the bell, or some combination of that, in every school, at every grade level.

What it has done, that in conjunction with community eligibility, our breakfast participation is starting to exceed that of lunch. Now, financially speaking, that is very good for the programs because the margin of profit, if you look at the Federal reimbursement versus the cost to produce a breakfast, the margin of profit is higher on a breakfast than that of a lunch. Plus, it is the most important meal of the day.

Now we have the naysayers in the beginning, for example, the teachers that did not want the food in the classrooms, will now go to bat for the program and are actually promoting the program because they can see such a huge difference in test scores, student attentiveness, reduced tardies, fewer trips to the school nurse, fewer behavioral problems. It has really changed the way we are educating kids in West Virginia.

We have one school district that, district wide, Mason County, their breakfast participation last year averaged almost 90 percent. Ninety percent of the children in that school had a breakfast on a daily basis. That is how we have done it. Through the economies of scale, the cost to produce one more breakfast or one additional

breakfast, the cost is not that significant, but the Federal revenue coming in on that one more breakfast is substantial.

Senator STABENOW. Thank you very much.

I know my time is up, Mr. Chairman, so thank you.

Chairman ROBERTS. Senator Boozman.

Senator BOOZMAN. Thank you, Mr. Chairman, and I apologize to you and the Ranking Member for running back and forth today. This is such an important hearing and such an important topic for Arkansas and the rest of the country. I am on another subcommittee, though, that also is very important and it has to do with violent crime, gangs and things like that, which, again, all of these things go together. So, like I say, I apologize for running back and forth.

Mr. Riendeau, and again, I know that these things have been discussed already and things, but it is such an important thing for Arkansas. Our summer meal participation has increased in recent years and is very, very important. However, we struggle to reach children in rural areas. Can you talk a little bit about the challenge that you have experienced with the meals program, and then, also, based on your experience, can you give us some concrete recommendations as to what we can do to overcome some of those challenges.

Mr. RIENDEAU. Sure. You know, as I said before, we have—Dare to Care serves both urban and rural counties, and probably much like your rural counties, particularly in Indiana, the distance between the communities is so great and the communities are so small that it is just very, very difficult to find locations where kids can go and congregate. Unlike our urban counties, there are not robust Boys and Girls Clubs with all-day programming and lots of things that these kids want to get to.

So, the challenge is how do we find a way to get these kids access to summer food based on the realities of the county in which they live. So, we have looked at several different options. One of the thoughts we have is we have looked at—we actually have a bus. We have a school bus now, and we are actually looking at the possibility of preparing meals in our community kitchen, loading those in Cambros, and putting them on the bus and taking them out to the rural counties and simply driving to the hollas [phonetic], where you will have a community of 20 families, and dropping the meals off and letting the kids consume them as the bus goes away and goes to the next community.

The challenge with that model under the current rules is unless the kids—unless we stop and the kids eat the meal on the bus and we count the number of children, we cannot be reimbursed. So, the sustainability of that model is doubtful and that is kind of the challenge that we are facing, which is why, one of the things we would like the committee to consider is allowing us to look at more flexible models in those counties, like I am sure in Arkansas would probably benefit deeply from that. Let us look at those and make those eligible for reimbursement, as well.

Senator BOOZMAN. Right. Mr. Goff, you mentioned that you started your program in 2009, and I think that is correct, okay, and I think that our States need to do as they feel like is best. Can you tell us, based on 2009 to now, what are your obesity levels? Have

they gone down, or have they flattened out, or do they continue to go up, or do you have any knowledge about that?

Mr. GOFF. In West Virginia?

Senator BOOZMAN. Yes, sir.

Mr. GOFF. We adopted those standards in 2008, and our, I think——

Senator BOOZMAN. What has happened as a result?

Mr. GOFF. I think our obesity rate has leveled off. I do not have the data, but I do know that our school environments are healthier. In West Virginia, hunger and obesity live side by side. In trying to put the finger on the culprit, we have done everything in our power to provide safe and healthy learning environments for our kids.

Senator BOOZMAN. No, and I agree with that, totally. The only reason I mentioned that is that this really does go together with a whole host of other things——

Mr. GOFF. Mm-hmm.

Senator BOOZMAN. —and, so, we need to address this. Like I say, I do not disagree that you all are doing a great job in the sense of doing what you feel like is best for your kids, but it is—I think one of the problems we run into is that we feel like if we just do this or that in this particular area, we are going to solve our problem, and the reality is, with P.E. and lots of other things, after-school activities, all of that goes together, and if we do not do it all, then we are going to be in trouble.

Ms. Jones, you mentioned in your testimony the importance of flexibility. Can you talk to us a little bit about specifically the kind of flexibility that you would like, or maybe in some areas or two.

Ms. JONES. Sure. In a la carte menu the fact that we had to take a healthy choice off like a sub sandwich with turkey and cheese, does not make sense to me. That is a healthy item. We would like to have that flexibility to put those type of items back on our a la carte items.

Having the decision to be able to raise the price of a meal or not, that should be determined by each district by what they feel their enrollment would be able to pay for. We want to be able to keep children coming into the cafeteria, because we cannot serve them nutritious meals if we do not have them eating with us.

These are examples of the type of struggles that we are asking for flexibility. With the fruit and vegetable requirements, we really want to encourage our kids. That is something we have always thought was very important. But, we do not want to lose our unlimited fruits and vegetables because we cannot afford to offer them.

Senator BOOZMAN. Thank you. Thank you, Mr. Chairman.

Chairman ROBERTS. Dr. Hassink, I apologize that we have not paid more attention to you, especially with all of the work that you have done.

Senator BOOZMAN. I would have if I had more time.

[Laughter.]

Dr. HASSINK. Thank you.

Chairman ROBERTS. But, and this is the typical situation where the Chairman of a committee is answering the question that I would have asked you. You made some excellent points with regard to a lack of specific nutrients at a specific time and the detrimental

effect that that has had on attention and development, short-term memory, IQ scores——

Dr. HASSINK. Yes.

Chairman ROBERTS. —everything that everybody strives for. But, if they miss the boat, they miss the boat. I am not asking you to expound upon that research. I think it is self-evident. But, I want to let you know how much we appreciate your coming and your statement.

I am now moving to the conclusion of our hearing this afternoon. Yes, it is this afternoon.

Thank you to each of our witnesses and to the first panel, as well, for taking your time, your very valuable time, to share your views related to the child nutrition programs. These testimonies that have been provided today are very valuable for the committee to hear firsthand and to keep on record. Your thoughts and insights will be especially helpful as we undergo the reauthorization process.

To my fellow members, I would ask that any additional questions that they may have for the record be submitted to the committee clerk five business days from today or by 5:00 p.m. next Thursday, May 14.

The committee now stands adjourned.

[Whereupon, at 12:32 p.m., the committee was adjourned.]

A P P E N D I X

MAY 7, 2015

Senate Committee on Agriculture, Nutrition & Forestry
A Review of Child Nutrition Programs
May 7, 2015
Statement for the Record

Senator Casey

Mr. Chairman and Madam Ranking Member, thank you for holding this hearing.

A child nutrition bill protects and assists the most vulnerable of our society – pregnant women and children who are food insecure, especially in a time of economic difficulties for so many families and communities across the country.

Healthy, nutritious food is critically important to the health and well-being of our children. That is why I supported the *Healthy, Hunger-Free Kids Act.*

The investments that the federal government makes in programs like School Lunch, WIC and CACFP means less money that we pay in health care costs for malnourished kids who develop health problems.

Pennsylvania has about half a million children living in poverty. That's about 17% of the children in Pennsylvania. For some of these children, healthy, free or reduced-cost breakfast and lunch or food provided in their child care setting is the only reason that they don't spend the day hungry.

I plan to introduce legislation to make much needed improvements to increase access to the Child and Adult Care Food Program, or CACFP, and strengthen CACFP's role in supporting good health and nutrition. CACFP provides healthy, nutritious meals to more than 3 million children each day who are in Head Start, Early Head Start and child care programs in both centers and family child care homes. Healthy eating and good nutrition are critically important for all children and particularly important for children ages 0-5 as their brains are rapidly developing. CACFP plays a critical role in educating children, families and child care providers about healthy nutrition and providing resources for at-risk children to eat healthy meals.

It is important to make sure that the kids who rely on federal nutrition programs get healthy, nutritious meals. The *Healthy, Hunger-Free Kids Act* helps to ensure more eligible children receive meals, increasing the number of eligible children and increasing the nutritional value of meals.

Hungry and malnourished children cannot fully participate in school. If children cannot have the benefit of nutritious school breakfasts or lunches, they cannot learn. It is as simple as that. None of us can function if we don't have enough healthy food to eat.

All the evidence indicates that if we invest in children, making sure they can learn at a very young age, they can learn more now and earn more later. We have to remain committed to these research-based strategies for our children.

As school is letting out, it is also important to remember the times when children are out of school – summer, weekends, school breaks – and are going hungry.

Isaiah 58:10 tells us, "And if you give yourself to the hungry And satisfy the desire of the afflicted, Then your light will rise in darkness And your gloom will become like midday." When we work together to feed the hungry, we bring light to the awful darkness of food insecurity that millions of children endure every day.

Thank you Mr. Chairman and Madam Ranking Member.

Statement Of Senator Patrick Leahy (D-Vt.),
Senate Committee On Agriculture, Nutrition, And Forestry
Hearing On "A Review Of Child Nutrition Programs"
May 7, 2015

I want to thank Chairman Roberts for holding this important hearing to discuss child nutrition programs.

When the Healthy Hunger-Free Kids Act was enacted five years ago, we made a commitment to improving the health of our Nation's young people by providing them with nutritious options at school. With a rise in obesity-related diseases, this Committee addressed the essential benefits of healthy food for particularly underserved youth. For the first time, the law implemented national school nutrition standards, even in vending machines and a la carte menus, to ensure children had access to the kind of nutrition that would improve their overall health and development.

Now the time has come to reauthorize the Healthy Hunger-Free Kids Act, and it is easy to see the impact of healthy food on our nation's underserved. I have heard from Vermont parents, teachers, and school food service staff who all agree we must continue to offer nutritious options throughout the school day and during the summer months. Too many children do not know where their next meal will come from, and we all know that a hungry child cannot learn.

In Vermont, schools have found new and innovative ways to connect children to their food. Through participation in school gardens, sustainability projects, and taste tests for new school menu items, children are learning about where their food comes from and its positive impact on their health. Last year, I showcased for this Committee the *New School Cuisine* cookbook, a collaboration between Vermont school food staff and the United States Department of Agriculture (USDA). The cookbook offers kid-tested and kid-approved meals comprised of USDA ingredients and farm-fresh products. This project highlights the dedication and creativity of our school food staff in offering delicious meals that kids want to eat.

It is a considerable point of pride that in 2013, Vermont became the first state to offer free breakfast and lunch to all students who are eligible to receive free and reduced meals. Since this regulation went into state law, schools have reported a significant increase in school meal participation and better academic performance overall. That is why I believe the Community Eligibility Provision of the Healthy Hunger-Free Kids Act is a significant step forward in promoting the value of serving vulnerable children and families. This program has helped some of Vermont's smallest, most rural schools offer free meals to all students, regardless of their ability to pay. As a result, schools have cited not only increased participation and performance in the classroom, but also dramatic reductions in referrals for poor behavior and attendance. As the Committee discusses solutions to combatting point of service and reimbursement error, I firmly believe we must follow Vermont's leadership in providing universal meals to all students.

Vermont has also long been a leader in the farm to school movement, which incorporates local agricultural products in schools. The program builds healthier eating habits, while supporting local agricultural producers. Since the farm to school grant program that I authored was included in the 2014 Farm Bill, the nationwide demand has far surpassed the USDA's capacity to award

funding. And that is why Senator Cochran and I have introduced the Farm to School Act of 2015. This bill aims to increase annual funding for Farm to School grants from $5 million to $15 million, as well as to improve access to critical federal funding for pre-kindergarten after school and summer school providers. Support for this program from states across the country only further highlights the desire of schools to implement healthy foods in school meals.

As important as the discussion around child nutrition is our commitment, too, to the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), which provides supplemental nutrition for low-income, at-risk pregnant and breastfeeding mothers, and their infants and children up to age five. The WIC program ensures that mothers and their children receive essential nutrition. The program has been directly linked to reducing infant mortality rates and improving the health and cognitive development of children. As the Committee discusses the importance of child nutrition programs, we must ensure WIC continues to receive the praise and support it deserves in providing for families in need.

Finally, I want to underscore the importance of summer meal programs, which offer crucial nutrition to underserved children during the summer. Although we are doing our part to offer meals for children at summer camps and community centers, well over one-half of all eligible participants are incapable of getting to feeding sites. As the Committee continues to discuss child nutrition in schools, let us not discount the essential support needed to provide for children facing food insecurity during the summertime.

This is an important hearing, and continuation of our child nutrition programs is nothing short of essential. I thank the Chairman once again for holding this important hearing.

# # # # #

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

A Review of Child Nutrition Programs

Mr. Richard J. Goff, Executive Director, Office of Child Nutrition, West Virginia Department of Education Child Nutrition Programs, State Agency Office, Charleston, WV

Thursday, May 7, 2015 at 10:00 a.m.
216 Hart Senate Office Building

Chairman Roberts, Ranking Member Stabenow, other members of the Committee, thank you for the opportunity to be here today and share in the discussion of a review of Child Nutrition Programs and our common mission of protecting the health of our nation's youth and the integrity of all federally funded nutrition programs.

Childhood hunger in West Virginia (WV) is as prevalent today than ever before. More than one in five West Virginia children live in a household that does not have sufficient access to food. Sixty percent (60%) of West Virginia school-aged children qualify for free or reduced priced school meals. That's 173,383 children whose family household income is below or nearly below the federal poverty level. Many of the remaining forty percent that do not qualify for free meals are the working poor. Those families struggling to pay the monthly bills while being confronted with a sizable lunch bill. Often times, the meals provided at school are the only nutritious meals that these children receive daily. Without adequate access to food, these children are at risk for health problems, obesity, nutrient deficiencies, and difficulties with learning and discipline that can echo throughout a lifetime.

The federal Healthy, Hunger-Free Kids Act of 2010 provided many changes and challenges to school districts all across our great nation. The new provisions of this Act placed children's health at the forefront of the Reauthorization process by adopting landmark progressive nutrition standards that focused on improving the nutritional composition of school meals while addressing the foods and beverages made available to students throughout the school environment. I appreciate the opportunity to discuss with you here today, a state agency's perspective of implementing these new standards and rules on a statewide basis.

West Virginia got an early start to implementing the provisions of the Healthy, Hunger-Free Kids Act of 2010. As you are aware, Congress directed the Center for Disease Control (CDC) to undertake a study with the Institute of Medicine (IOM) to review and make recommendations about appropriate nutritional standards for the availability, sale, content and consumption of foods at school, with attention on competitive foods. In April of 2007, the IOM released their report, *Nutrition Standards for Foods in Schools: Leading the Way toward Healthier Youth*. On January 10, 2008, the West Virginia Board of Education (WVBOE) repealed and replaced its *Policy 4321.1, Standards for School Nutrition*, and quickly adopted the IOM recommended standards. West Virginia's legislative rule established nutrition standards for foods sold, served and/or distributed to students in schools during the school day. The policy addressed both the nutritional standards for school meals and other foods and beverages sold, served or distributed to students outside the cafeteria throughout the entire school environment. West Virginia's *Standards for School Nutrition*, was one of the first state board policies to adopt and implement many of the provisions stipulated in the Institute of Medicine's Report from their Committee on Nutrition Standards for Food in Schools.

Initially, many school food service personnel, students and parents balked at the new nutritional changes. Additionally, school administrators, staff and fundraising groups did not approve or support the new guidelines. Lunch participation rates initially dropped and complaints were a common occurrence. The WV Office of Child Nutrition developed a comprehensive implementation plan for the new policy. The plan focused on the education of school administrators, school nutrition workers and school staff. The media, workshops, guidance memos and a parent website assisted in explaining the need for the nutritional standards changes and help garner support for the new initiatives. A "From-Scratch" statewide training was provided to the cook staff as a means to reduce the serving of processed, heat-n-serve items high in saturated fat and sodium. As the acceptance of the changes in the school meals menus and competitive food rules improved, meal participation rates started to rebound and improve. By the time the Healthy, Hunger-Free Kids Act of 2010 passed, WV was starting to make miraculous improvements in their school meals. Fresh fruits and vegetable salad bars were becoming more and more popular. Skim and low fat milk were no longer a topic of discussion and students were now asking for more of the "brown bread". Soft drink and unhealthy vending machines no longer cluttered our school hallways. Unhealthy fundraising programs like the "cookie dough" and "candy bar" sales were now a thing of the past. School administrators were no longer balancing their school budgets on the backs of our children's health.

In 2010, the Healthy, Hunger-Free Kids Act came along and strengthened our state's already strong nutrition standards. The Act brought with it even more changes to our nutrition programs, but this time we were poised to make the changes seamlessly throughout our state. We were ahead of the curve so to speak. With our IOM nutrition standards in place, and in anticipation of the many regulatory changes to come, the Office of Child Nutrition decided to focus on the technology side of our program. The WV Office of Child Nutrition established a food service director's list serve comprised of every food service director's email address. The list serve allows the state agency to communicate with all 55 county school districts with the push of the "send" button. Paper communications and "snail mail" were now obsolete. The list serve also allowed anyone on the list to communicate with their peers and fostered statewide communication among the nutrition directors. Menu sharing, cooperative purchasing and problem solving were starting to evolve.

In 2009, WV implemented the first statewide counting and claiming system. Our state utilizes one software application throughout the entire state. The Point of Sale (POS) software is housed in every school cafeteria in our state. It interfaces with each of our 55 local education agencies, as well as, the state agency office. The computer application counts, categorizes and claims every reimbursable meal served to a participating student on a daily basis and generates a lunch bill for the parents of those students that are of paying status. State agency staff has the capability of knowing if any child in our state participated in breakfast or lunch in real time from their office computer from the state agency office. This statewide application also assists in the determination of student eligibility for meal benefits. Statewide Direct Certification was born along with statewide student eligibility. The West Virginia Department of Education and the West Virginia Department of Health and Human Resources combined efforts to extend meal benefits to families in need through an agreement to share data for determining meal eligibility without completing the application process. This direct certification match is completed weekly and students are identified as free meal recipients at the state agency level and student status is pushed down to the school level electronically. Since the eligibility determination is made at the state agency level, as families move and relocate throughout the state, a student's eligibility status follows them, thereby eliminating any interruption to their meal benefits. Families are no longer required to "reapply" for meal benefits at the new school they are relocating to. This advancement significantly increased the federal meal reimbursement revenues for the state of West Virginia. Additionally, uncollectable student lunch bill bad debts were also reduced substantially.

The statewide automation of our POS system also streamlined the monitoring of our program sponsors. The Healthy, Hunger-Free Kids Act changed the monitoring frequency of our programs from a five year cycle to a three year cycle. This change became a challenge for some states; however our monitoring time in the field was reduced by approximately fifty percent (50%) as a result of our statewide system. Our technology enables us to complete much of our audits and reviews from our offices at the state agency in Charleston, WV. Claims for federal reimbursement, meal application monitoring, the verification process and direct certification reviews can now be completed prior to entering the school or district from our main offices. Additionally, the system has programmed edit checks and audit functions to prevent duplicate claims, fraudulent claims and over payments to program sponsors.

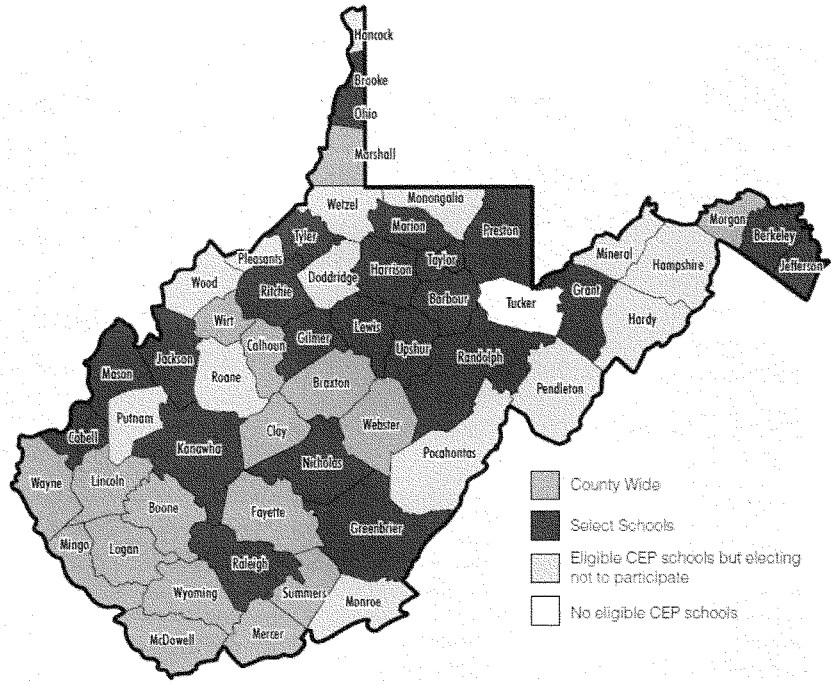
The Healthy, Hunger-Free Kids Act of 2010 also created a very innovative and progressive approach to providing nutritious meals to low-income children. The statewide automation of our POS system also facilitated the implementation of the Community Eligibility Provision (CEP) by enabling the state agency to determine which schools and districts were eligible. CEP is an innovative universal free meal service option designed to make it easier for low-income children to receive meals in the school meals program. CEP is an alternative to collecting, approving and verifying household eligibility applications for free and reduced price eligible students in high poverty local education agencies. To be eligible for CEP, the school or schools within a county must have a percentage of enrolled students who were *Identified Students*; this primarily includes students who are directly certified for free meals on the basis of their participation in the Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) Program. Once a school or district qualifies and agrees to participate in CEP, **all** children are able to participate in breakfast and lunch at no charge to the parents.

In school year (SY) 2011-2012, Community Eligibility Provision was available as a pilot. During a three year period, USDA selected eleven states to participate in the pilot that helped shape the final regulations for the Provision. Initially, WV was not selected to participate as a pilot state; however, we did it anyway. WV sponsored its own version of community eligibility entitled "WV Universal Free Meals Pilot Project". Fortunately, WV was selected to participate in round two of the pilot that began the very next year (SY 2012-2013). West Virginia seized the opportunity and forfeited the "pilot" approach and implemented the initiative immediately. Beginning this year, SY2014-2015, all schools nationwide that meet the required identified student threshold are eligible to participate in this Provision.

Community Eligibility Provision in WV (55 counties / 688 schools statewide - 54% participation**)**

	SY 2012-2013	SY 2013-2014	SY 2014-2015
Number of counties with at least one CEP eligible school	54	52	54
Number of counties participating in CEP	35	39	40
Number of counties implementing CEP countywide	11	14	17
Number of schools participating	283	335	374
Number of students impacted	90,000	>110,000	128,041

COMMUNITY ELIGIBILITY PROVISION



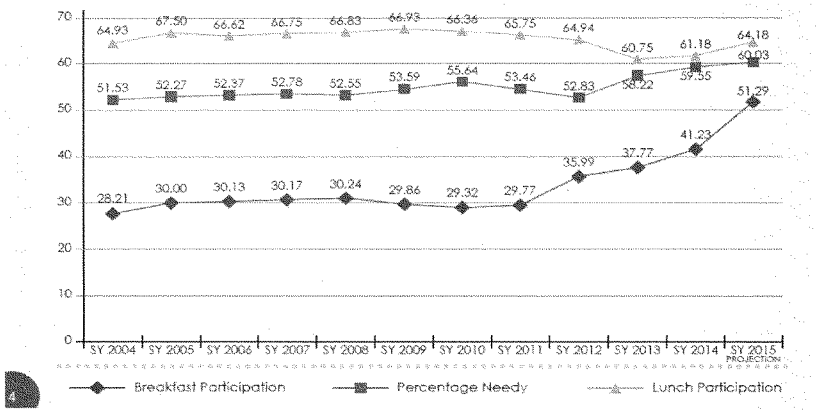
To address the issue of childhood hunger throughout our state, the West Virginia Legislature passed Senate Bill No. 663 in April 2013, creating the *West Virginia Feed to Achieve Act*. The bill, sponsored by Senator John R. Unger, was signed into law by Governor Earl Ray Tomblin. It focuses on improving the nutrition, physical activity and health of West Virginia's children. The need for the bill was simple; every child needs nutritious meals in order to achieve his or her potential. The West Virginia Feed to Achieve Act has ensured that every school-aged child is given the nutritious meals that their growing bodies require in order to succeed in life. West Virginia is the first state in the nation to pass and implement into law a bill that puts children's health and nutrition in the forefront of education. Research has found that students who participate in school breakfast show improved attendance, behavior, standardized achievement test scores as well as decreased tardiness. The Feed to Achieve Act has realigned breakfast with the instructional day, giving every student the opportunity to eat a school breakfast. With this law, the West Virginia Legislature recognized the connection between student health and academic success.

The West Virginia Feed to Achieve Act requires all public schools to implement innovative breakfast delivery strategies and lunch options that provide students with a minimum of two nutritious meals per day and, where feasible, at no cost to the student. The state agency approved breakfast strategies must be instituted in a manner that prohibits the breakfast program and student accessibility from competing

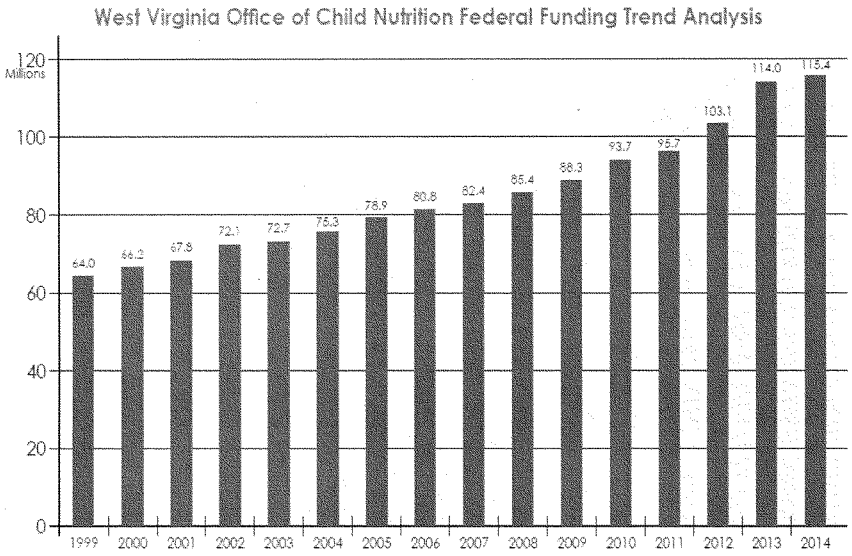
with the start of the school day. In WV, as in most states, breakfast was typically offered at the worst possible time of the day; at the beginning of school. Students are arriving, buses are late, the tardy bell is ringing and most kids want to talk to their friends. Breakfast was set up to fail. In our state, we were not even meeting the needs of our hungriest students. Our state is comprised of approximately 60% needy students, those children that qualify for free or reduced price meals. Prior to community eligibility and the WV Feed to Achieve Act, we were serving only 29% of our enrolled children a breakfast on a regular basis. To be successful and meet the needs of the students, breakfast must be readily accessible by the students. Implementation of these innovative breakfast delivery strategies began in fiscal year 2013, with full implementation required in all schools at the start of the 2015 school year. Innovative breakfast delivery strategies include, but are not limited to: Grab-N-Go Breakfast, Breakfast in the Classroom, Breakfast After First, or a combination of the three.

HISTORICAL PERFORMANCE

Based on trend data, it is projected that there will be over a 10 percent increase in breakfast participation for School Year (SY) 2015:



The West Virginia Office of Child Nutrition administers six United States Department of Agriculture (USDA) nutrition programs for children. They include the National School Lunch Program, School Breakfast Program, Child and Adult Care Food Program, Summer Food Service Program, Fresh Fruit and Vegetable Program and the Special Milk Program. In West Virginia, more than $115 million dollars assists program sponsors to provide healthy, low-cost or free meals and snacks to children and functionally impaired adults in a variety of settings, including public and private schools, child care centers, residential institutions, shelters, family day care homes, summer camps and parks. In addition to providing nutritious meals and snacks, child nutrition programs promote lifelong healthful eating practices by integrating nutrition education, creating healthy learning environments and promoting nutrition in the community. Child nutrition programs are intended to serve the nutritional needs of all children, regardless of family income. Since the inception of the National School Lunch Act almost 70 years ago, Congress has affirmed the importance of sound nutrition to the health and welfare of children. The chart below reflects the amount of federal funds, in millions, which the WV, OCN has administered throughout the state for child nutrition programs since the year 1999.



The fight to combat childhood obesity rages on while I live in a state where childhood obesity and hunger live side by side. We have made great strides to change school campuses and provide our students with a safe and healthy learning environment. Our children spend the majority of their waking hours at school. Schools should be held to a higher standard when it comes to our children's safety and health. The Healthy, Hunger-Free Kids Act included many significant changes that have already manifested into positive outcomes for children. West Virginia was fortunate to have a head start with the implementation of many of the provisions of the Act and now stand upon our eighth year of applying the new standards. Student meals are healthier than any time before. Student meal participation rates are at an all-time high across our state. Federal funding needed to server nutritious meals and stave off hunger is the highest level it has ever been. The new standards are in place and children are participating and families are receiving financial relief from the community eligibility provision. West Virginia, a small, poor, coal mining state nestled in the hills of Appalachia has implemented all of the provisions of the Healthy, Hunger-Free Kids Act. I can honestly say that if West Virginia, a state with limited resources, can achieve success and change the school environment; it is within reach of any state. Passion, determination and a will to provide a healthier future for our children can move mountains.

In closing, I would like thank Chairman Roberts for the opportunity to be here today and address the Committee on such an important issue. I have dedicated my career to the support and improvement of Child Nutrition Programs. The health of our youth is critical to every aspect of our future. I urge this committee and Congress to continue the great work that you are doing to help make our children, our programs and our future a success.

American Academy of Pediatrics

DEDICATED TO THE HEALTH OF ALL CHILDREN™

Testimony of
Sandra G. Hassink, MD FAAP

On behalf of the
American Academy of Pediatrics

Before the
Senate Agriculture Committee

May 7, 2015

American Academy of Pediatrics • Department of Federal Affairs
601 13th Street NW, Suite 400 North • Washington, DC 20005
Tel: 800.336.5475 • E-mail: kids1st@aap.org

Sandra G. Hassink, MD FAAP
American Academy of Pediatrics
Senate Agriculture Committee
May 7, 2015

Chairman Roberts, Ranking Member Stabenow, members of the committee, I am Sandra Hassink, and I am President of the American Academy of Pediatrics (AAP), a non-profit professional organization of 62,000 primary care pediatricians, pediatric medical sub-specialists, and pediatric surgical specialists whose mission it is to attain optimal physical, mental and social health and well-being for all infants, children, adolescents, and young adults.

It is an honor to be here today speaking about a subject on which I have dedicated my life's work, childhood obesity and the connection between nutrition and health. I began the weight management clinic at Nemours A.I. duPont Hospital in Wilmington, DE in 1988, and for the last 27 years have cared for children with overweight and obesity. In addition to being AAP president, I am medical director for the AAP Institute for Healthy Childhood Weight whose mission it is to empower pediatricians, their teams, patients, and families to achieve a healthy weight.

I'd like to begin today by focusing on the building blocks of a foundation of child health and highlighting what I see as the three basic needs of every child that will ensure this foundation:

- Sound, appropriate nutrition;
- Stable, responsive and nurturing relationships; and
- Safe, healthy environments and communities.

Meeting these needs for every child is fundamental to achieving and sustaining optimal child health and well-being into adulthood for all children.

Early Nutrition as a Critical Factor in Childhood Development and Adult Health

Exciting new data shows the short- and long-term impacts of investments in nutrition and health care during the prenatal and early childhood years. The time period from pregnancy through early childhood is one of rapid physical, cognitive, emotional and social development and because of this, this time period in a child's life 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.

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 a toxic mix and 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.[i]

Sandra G. Hassink, MD FAAP
American Academy of Pediatrics
Senate Agriculture Committee
May 7, 2015

Optimal overall brain development in the prenatal period and early years of life depends on providing sufficient quantities of key micronutrients 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.[ii]

Micronutrients such as iron and folate demonstrated effects on 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.[iii]

It is important to note that lack of adequate access to food is itself a contributor to toxic stress. Toxic stress, a result of prolonged exposure to adverse childhood experience in the absence of caring, stable relationships with adults, can affect the physical, mental, and economic well-being of children well into adulthood.[iv] The inability to provide food for yourself or your children creates stress in families, contribution 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.

The Double Burden of Obesity and Food Insecurity

Today our children are experiencing an unprecedented nutritional crisis resulting in the double burden of obesity and food insecurity. The picture of food insecurity is increasingly a child with overweight or obesity consuming a poor-quality diet. Families with children are more likely to be food insecure than families without children, and being food insecure makes families especially vulnerable to obesity due to the additional risk factors associated with poverty including lack of access to healthy, affordable foods, fewer opportunities for physical exercise, high levels of stress, and limited access to health care. Good nutrition is not only an essential component of chronic disease prevention and treatment; it also helps treat the effects of chronic hunger.

In food insecure households, parents reported poorer health and developmental risks in their children including more frequent stomach aches, headaches, colds, hospitalizations, anemia, and chronic conditions. Parents also reported more anxiety, depression and difficulties in school.[v] Infants are more likely to have insecure attachments and perform more poorly on cognitive assessments.[vi]

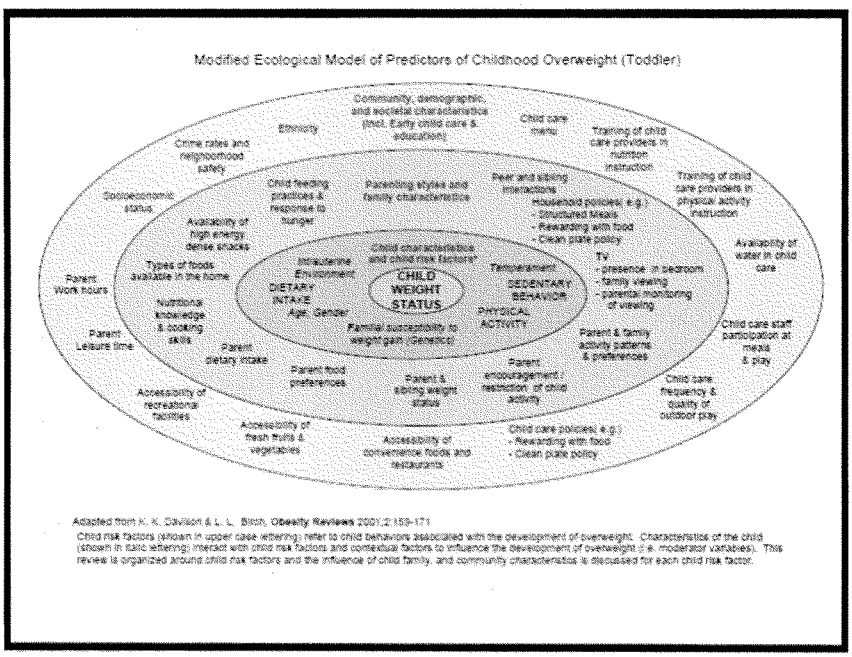
Sandra G. Hassink, MD FAAP
American Academy of Pediatrics
Senate Agriculture Committee
May 7, 2015

As a pediatrician who has specialized in caring for children suffering from overweight and obesity, I can tell you firsthand that we have an urgent public health problem facing our children. Nearly 1 in 3 school-age children and adolescents has overweight or obesity and only half of all children ages 2 to 17 meet federal diet quality standards. Children who have overweight or obesity as preschoolers are 5 times as likely as normal-weight children to have overweight or obesity as adults. Children with obesity are at increased risk for high blood pressure, high cholesterol, cardiovascular disease, type 2 diabetes, asthma, and social and psychological problems. Obesity disproportionately affects minority children and the highest rates of obesity are found in people with the lowest incomes.

When I started my practice in childhood weight management 27 years ago, I was seeing adolescents. When I retired last October I had a special clinic for children under 5 with obesity. These children were already showing the effects of their increased Body Mass Index on their blood pressure, and measures of blood sugar control. We saw obesity related liver disease in 4 year olds and had children with prediabetes as young as 6.

First and foremost, we must recognize that there is no single factor responsible for obesity. Obesity is the end result of a complex interplay of different issues. Davidson and Birch described the "socio-ecologic" model of obesity, which illustrates the many factors that impact weight. The concentric circles of this model show the issues related to the individual, family, community, and larger social structure that either promote or inhibit good nutrition, physical activity, and overall health. Any meaningful attempt to stem the rising tide of obesity must address many of these issues simultaneously and over a prolonged period of time in order to produce sustainable change.

Sandra G. Hassink, MD FAAP
American Academy of Pediatrics
Senate Agriculture Committee
May 7, 2015



Effective Programs and Strategies

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. 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.

Sandra G. Hassink, MD FAAP
American Academy of Pediatrics
Senate Agriculture Committee
May 7, 2015

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.[vii] WIC is particularly effective at improving birth outcomes in the moms with inadequate prenatal care and who are particularly high risk cases.[viii] One study found that WIC helps eliminate socioeconomic disparities in birth outcomes.[ix]

WIC has played an important role in promoting breastfeeding and improving breastfeeding initiation. However, this is an area where further improvements can be made to support continuation of breastfeeding to meet AAP recommendations. These recommendations are to exclusively breastfeed 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.[x]

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 breastfeeding peer counseling program within WIC to $180 million.

In a time of limited federal resources and maximizing the efficiencies of those limited resources, I urge the committee to look for ways to even further streamline the WIC enrollment process. One example might be to give states the option to certify infants for two years to eliminate duplicative paperwork. Another would be to extend eligibility for children to age 6 to assure a continued strong health and nutrition foundation and to help ensure there are no nutritional and health care lapses prior to school entry.

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. I urge the committee to preserve and protect the integrity of the WIC food packages by basing them on sound scientific evidence.

Similarly, as the committee looks ahead to the reauthorization of WIC, I urge you to keep in mind that WIC is a targeted intervention for mothers and young children with

impacts that can be long-term in nature including health outcomes, educational prospects, and the prosperity of our communities.

WIC is just one intervention to address the double burden.

Families, our schools, child care, communities, and certainly pediatricians have an important role to play in shaping healthy habits. As the committee prepares to reauthorize the child nutrition programs, I urge you to make addressing the double burden of obesity and food insecurity in young children a priority. We must ensure that the foods our children receive in school and child care are of high nutritional quality and we must not forget that countless children go without access to food during out of school or child care time including mornings, evenings, weekends and especially summer. 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.

When you are in the middle of an epidemic – and I believe we are – you cannot keep doing what you've been doing. As pediatricians, parents, community leaders, and policy makers, we have an obligation to ensure that the food we provide our children is healthy and nutritious and that we model that behavior as adults.

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 health 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.

The AAP Institute for Health Childhood Weight developed Health Active Living for Families with tools and tips on healthy eating and physical activity for children under 5. It's important that obesity prevention and treatment focus on family systems changes, lifestyle modifications, and access to healthy, affordable food and physical activity. New research shows the increasingly important relationship of fathers on their child's nutrition and physical activity including a position association between father's and preschooler's Body Mass Index. All mothers want their children to eat, grow and be healthy but we are learning that maternal feeding goals often depend on the child's characteristics. Therefore, we may need more tailored interventions for families to be effective in addressing the double burden.

Sandra G. Hassink, MD FAAP
American Academy of Pediatrics
Senate Agriculture Committee
May 7, 2015

Good nutrition in childhood sets the stage for lifelong health. Just like we vaccinate to protect against the flu, so too can we provide pregnant women and children with nutritional assistance and breastfeeding support to protect against chronic disease. As we celebrate our mothers this weekend, I urge the committee to put their nutritional needs and those of their children first. Our children's health simply cannot wait.

Thank you and I would be happy to answer any questions.

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Testimony of
Mrs. Cindy Jones
Business Management Coordinator for School Nutrition Programs
Olathe Public Schools District 233, Olathe Kansas
Public Policy/Legislation Chair and Past-President
School Nutrition Association of Kansas
before the
U.S. Senate Committee on Agriculture, Nutrition and Forestry
Hearing: A Review of Child Nutrition Programs
Thursday, May 7th at 10:00 a.m.

Chairman Roberts, Ranking Member Stabenow, Members of the Committee: I would first like to express my gratitude for having me here to testify. Throughout the State of Kansas we have thousands of hardworking school nutrition professionals who understand that the meals they provide are often the best meals that many of their students receive. Our goal is to ensure that all children receive the nutrition required for their health and academic success. Hungry children simply cannot learn and thrive.

This is my 22nd year working in School Nutrition. In my position, I am responsible for all financial and business aspects of our school nutrition programs.

The Olathe Public Schools is the second largest school district in Kansas. We have 51 schools, two Head Start programs and an enrollment of over 29,000 students. Twenty-seven percent of our students receive free or reduced priced meals.

Our school nutrition team has 275 employees, including two Registered Dietitians. We serve approximately 24,000 meals per day (over 4 million meals per year) on a $12.5 million budget.

At Olathe, we are committed to delivering nutritious meals to at-risk students. We have had significant successes in serving vulnerable populations thanks to a well-coordinated effort by the community, school district and foodservices operation.

An example of this is our Universal Free breakfast in the classroom program at five elementary schools. Each morning our staff loads breakfast into rolling bags. The bags are then picked up by students or school staff and delivered to each classroom. When the students arrive, breakfast is waiting for them. Before we implemented the program, we were serving an average of 550 breakfasts per day at the five sites; we are now serving over 1400 per day. We have seen lots of successes with the program: fewer tardies and absentees, and better behavior as students are no longer complaining about being hungry. Our program was recently highlighted by Kansas State Department of Education during National School Breakfast Week. We are very excited because now other districts across Kansas are coming to visit our program to learn from our success.

We are now looking at starting second chance breakfast at our secondary schools. This will allow students another opportunity to get breakfast between 1st and 2nd period. We have found that many students miss out on school breakfast because they arrive late or are not hungry first thing in the morning. We are hoping to increase participation by offering this option.

We also participate in summer feeding. We provide breakfast and lunch at our five summer school sites and lunch at our two open sites. At the open sites any student between the ages of 1-18 can come and receive a free lunch. We serve an average of 1,200 lunches and 700 breakfasts per day.

Implementing and expanding access to these critical school meal programs has helped our district to remain financially sound while providing the nutrition that is vital to our students. Even before the Healthy, Hunger-Free Kids Act (HHFKA) became law, school nutrition professionals across Kansas have been working hard to improve the nutrition of school menus. In our district we offer unlimited fruits and vegetables, serve whole grains and are meeting our limits on calories and unhealthy fats, while reducing sodium.

However, we are facing many challenges. Since the implementation of the new requirements, we are seeing a decline in our participation. Students are now bringing meals from home. At our elementary schools, participation has dropped by more than 9%. At the secondary schools our number of reimbursable meals has increased by 8% as some students shifted from eating a la carte to choosing school meals. However, many other students stopped purchasing our foods altogether, so overall participation and revenue has dropped.

Almost all of the students leaving the lunch program are our paid students. If this trend continues, the school cafeteria will no longer be a place where all our students go to receive the nutrition they need, but rather a place where poor students go to get their free meals. W e have worked for years to fight the stigma associated with the free and reduced meal participation, so it is heartbreaking to see our progress decline.

Many districts across Kansas have students leaving the program for a variety of reasons. For example, the HHFKA's paid lunch equity mandate forces many schools to raise lunch prices. Many of our families do not qualify for meals assistance, however they are struggling financially. I was visiting with a little girl at one of our elementary schools and she shared with me that now she can only choose a couple of days a week to eat with us. This trend is likely to persist as we continue to raise prices. Many of our paid families will no longer be able to afford to eat with us, and the financial losses to our program may force us to cut staff, further impacting the community.

Because of the Smart Snacks in School implementation, we have seen huge declines in a la carte sales. We are estimating a loss of over $700,000 in a la carte revenue due to the new regulations. We relied very heavily on this source of income. Items such as our fresh-to-go salads had to be taken off the menu because the small amounts of meat, cheese and salad dressings did not meet the sodium and fat requirements. To make our sub sandwich meet the requirement, we had to shrink their size, remove the cheese and switch to whole grain bread. This was a very popular a la carte item, and now we sell very few. We can, however, serve diet soda, sugar free gum, and Pop-Tarts. We have chosen not to sell these items, but this illustrates how the regulations do not always make sense. Allowing items permitted to be served as part of a reimbursable meal to also be sold a la carte would increase the healthy options available to our students.

Despite our best efforts to make meals more appealing, we are struggling with student acceptance of new options, particularly whole grain items. Many schools in Kansas have been challenged to find whole grain rich tortillas, pizza crust, biscuits, pasta, crackers and other specialty items that appeal to our students. We can complete a waiver to return to the 2012 requirement that half of grains offered must be whole grain rich, instead of all grains, but this waiver is only good thru the 2015-16 school year. I believe that this should be made permanent, since the Dietary Guidelines for Americans allows for the consumption of some refined grains.

Kansas schools are also concerned about sodium requirements. We are asking to maintain the Target 1 sodium level reductions and suspend implementation of further targets. The Institute of Medicine warned that making further reductions will present major challenges and may not even be possible. If the reductions continue we will be serving healthy children meals that are at a therapeutic low sodium diet level.

Every student must now take a fruit or vegetable with their meals, whether they intend to eat it or not. As a result, we have seen an increase in good food going to waste in our schools, particularly in our breakfast in the classroom programs. We have always encouraged our students to choose fruits and vegetables, and have even distributed free samples along with stickers that say "I Tried It" to encourage students to eat them. But forcing students to take fruits and vegetables turns a healthy choice into a negative experience. Encourage and educate, instead of require, is always the best option.

Olathe's school meal program is self-supporting and operates on a tight budget. W e must cover our supply costs, salaries, benefits, workers comp, insurance, utilities, equipment maintenance, software, delivery trucks and district indirect costs. We are left with a little over $1 to spend on the food for each lunch tray. Imagine going to the grocery store and all you have is $5 to spend on a meal for your family of four, and that meal must include milk, fruits, vegetables and a healthy entrée. Could you do it every single day of the week? That is what we are expected to do.

My involvement in the School Nutrition Association of Kansas has given me the opportunity to meet with school nutrition professional all across Kansas and Missouri. I have witnessed their accomplishments and their challenges. Some districts have been able to overcome many of the challenges under the new requirements – particularly those with very high free and reduced price eligibility, which provides higher meal reimbursements, access to federal grants and programs, and higher student participation rates.

However, many districts like Olathe are struggling both from reduced revenue from declining participation and the higher costs of preparing meals that meet the requirements. We don't have access to many federal assistance grants and programs.

A colleague recently shared that for the first time he is projecting his program will end the year in the red. This district has a very low percentage of free and reduced students and relied heavily on their a la carte sales. That is why it is vital to allow flexibility, so all School Nutrition programs can be successful for the students and families we serve.

There is a lot of negative press about School Nutrition Programs asking for flexibility; to me this is very hurtful. I have spent over 20 years starting programs, ensuring that our students are receiving the benefits that they need, getting student input and promoting healthy eating. I have worked a lot of hours with little pay. I do it because it is important. I also have a responsibility to make sure that our program is financially sound so we do not have to rely on our district to help fund us. We are only asking for a little flexibility to ensure all School Nutrition Programs are successful. Have faith in the knowledge and desire that all school nutrition professionals want the very best for America's children. After all they are our children and grandchildren too.

Thank you again for the opportunity to testify before the Committee. I would be happy to answer any questions you may have.

United States Government Accountability Office

Testimony

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

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SCHOOL-MEALS PROGRAMS

Additional Verification Could Help USDA Ensure Legitimate Access

Statement of Stephen M. Lord, Managing Director,
Forensic Audits and Investigative Service

GAO-15-594T

GAO Highlights

Highlights of GAO-15-594T, a testimony before the Committee on Agriculture, Nutrition and Forestry, U.S. Senate

May 7, 2015

SCHOOL-MEALS PROGRAMS

Additional Verification Could Help USDA Ensure Legitimate Access

Why GAO Did This Study

In fiscal year 2014, 30.4 million children participated in the National School Lunch Program and 13.6 million children participated in the School Breakfast Program, partly funded by $15.1 billion from USDA. In May 2014, GAO issued a report on (1) steps taken to help identify and prevent ineligible beneficiaries from receiving benefits in school-meal programs and (2) opportunities to strengthen USDA's oversight of the programs.

This testimony summarizes GAO's May 2014 report (GAO-14-262) and January 2015 updates from USDA. For the May 2014 report, GAO reviewed federal school-meals program policies, interviewed program officials, and randomly selected a nongeneralizable sample that included 25 approved applications from civilian federal-employee households out of 7.7 million total approved applications in 25 of 1,520 school districts in the Dallas, Texas, and Washington, D.C., regions. GAO performed limited eligibility testing using civilian federal-employee payroll data from 2010 through 2013 due to the unavailability of other data sources containing nonfederal-employee income. GAO also conducted interviews with households. GAO referred potentially ineligible households to the USDA Inspector General.

In its 2014 report, GAO recommended that USDA explore the feasibility of (1) using computer matching to identify households with income that exceeds program-eligibility thresholds for verification and (2) verifying a sample of categorically eligible households. USDA generally agreed with the recommendations and has actions under way to address them.

View GAO-15-594T. For more information, contact Stephen M. Lord at (202) 512-6722 or lords@gao.gov.

What GAO Found

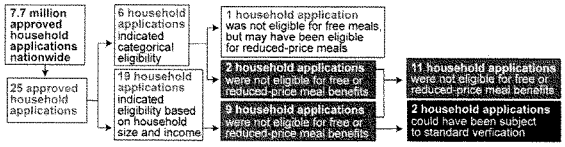
In May 2014, GAO reported that the U.S. Department of Agriculture (USDA) had taken several steps to implement or enhance controls to identify and prevent ineligible beneficiaries from receiving school-meals benefits. For example:

- USDA worked with Congress to develop legislation to automatically enroll students who receive Supplemental Nutritional Assistance Program benefits for free school meals; this program has a more-detailed certification process than the school-meals program.
- Starting in the 2013–2014 school year, USDA increased the frequency with which state agencies complete administrative reviews of school districts from every 5 years to every 3 years. As part of this process, state agencies review applications to determine whether eligibility determinations were correctly made.

In its May 2014 report, GAO identified opportunities to strengthen oversight of the school-meals programs while ensuring legitimate access, such as the following:

- If feasible, computer matching income data from external sources with participant information could help identify households whose income exceeds eligibility thresholds. As of May 2014, school districts verified a sample of approved applications deemed "error-prone"—statutorily defined as those with reported income within $1,200 of the annual eligibility guidelines—to determine whether the household is receiving the correct level of benefits (referred to as standard verification in this testimony). In a nongeneralizable review of 25 approved applications from civilian federal households, GAO found that 9 of 19 households that self-reported household income and size information were ineligible and only 2 could have been subject to standard verification.
- Verifying a sample of categorically eligible applications could help identify ineligible households. GAO reported that school-meal applicants who indicate categorical eligibility (that is, participating in certain public-assistance programs or meeting an approved designation, such as foster children) were eligible for free meals and were generally not subject to standard verification. In a nongeneralizable review of 25 approved applications, 6 households indicated categorical eligibility, but GAO found 2 were ineligible.

Results of GAO's Analysis of a Nongeneralizable Sample of 25 Approved Household Applications from the 2010–2011 School Year



Source: GAO analysis of school-meals household applications. | GAO-15-594T

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

I am pleased to be here today to discuss the findings of our May 2014 report on oversight of federal school-meals programs.[1] A well-balanced and nutritional diet for school children is essential for their overall health and well-being, and helps promote academic achievement. With children spending a considerable amount of their day at school, meals served during the school day play an important role in providing such a diet. During fiscal year 2014, about 30.4 million children participated in the National School Lunch Program and about 13.6 million participated in the School Breakfast Program.[2] Both of these programs are administered by the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) through state agencies that oversee local entities that provide school meals. The federal government provides cash reimbursements for each meal that meets nutritional requirements that is served at schools that participate in the lunch and breakfast programs. In fiscal year 2014, USDA spent about $15.1 billion on these programs.

Students who participate in these programs may qualify for free or reduced-price meals depending on their household income and household size.[3] School districts determine individual student or household eligibility for free or reduced-price meals by reviewing applications submitted by households or through a process referred to as "direct certification." Under direct certification, state agencies provide school districts with a list of students whose households receive certain public-assistance benefits, such as through the Supplemental Nutrition Assistance Program (SNAP), and school districts confer eligibility for free school meals to these students. Thus, directly certified participants are automatically certified for school-meals benefits without having to fill out a separate school-meals application. Students receiving certain public-assistance benefits or meeting an approved designation, such as if they

[1]GAO, *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).

[2]This figure includes all 50 states, the District of Columbia, Guam, Puerto Rico, and the Virgin Islands, as well as children of Department of Defense armed forces personnel attending schools overseas.

[3]Students may also pay full price for these meals.

are homeless or foster children, are categorically eligible for free-meal benefits. School districts can certify categorically eligible students into the school-meals program either through review of an application or through direct certification.

The Office of Management and Budget (OMB) has designated the National School Lunch Program as 1 of 13 federal "high-error" programs due to its large estimated improper payments—approximately $1.7 billion in fiscal year 2014.[4] According to OMB guidance, an improper payment is any payment that should not have been made; that was made in an incorrect amount (including overpayments and underpayments) under statutory, contractual, administrative, or other legally applicable requirements; or for which insufficient or no documentation was found.[5]

My remarks today highlight the key findings of our May 2014 report on oversight of school-meals programs. Specifically, like the report, this testimony discusses (1) USDA's steps taken to help identify and prevent ineligible beneficiaries from receiving benefits in school-meal programs and (2) opportunities to strengthen USDA's oversight of the school-meals programs. Because of limited salary and income data available for all U.S. households, our case-study examples were limited to civilian executive-branch employees and United States Postal Service (USPS) employees.[6]

My statement is based on our May 2014 report with selected updates from USDA related to the status of our recommendations. For our May 2014 report, we reviewed FNS policies and regulations and interviewed

[4]High-error programs are those programs that reported roughly $750 million or more in improper payments in a given year, did not report an error amount in the current reporting year but previously reported an error amount over the threshold, or have not yet established a program error rate and have measured components that were above the threshold. USDA estimates that approximately $959 million of its fiscal year 2014 improper payments represents certification errors and approximately $789 million represents school-district counting and claiming errors. USDA estimates that the School Breakfast Program had approximately $923 million in improper payments in fiscal year 2014. USDA uses extrapolations from statistical models to develop estimates of improper payments for school-meals programs.

[5]Improper payment estimates reported by federal agencies are not intended to be an estimate of fraud in federal agencies' programs and activities.

[6]Throughout this testimony, we use the term "federal employees" to refer to both civilian executive-branch employees and USPS employees.

program officials. We also randomly selected a nongeneralizable sample that included 25 applications from federal-employee households out of the 7.7 million approved household applications from 25 of 1,520 school districts in the Dallas, Texas, and Washington, D.C., regions—areas with different federal-employee concentrations—in the 2010–2011 school year.[7] We performed limited eligibility testing using civilian federal-employee payroll data from 2010 through 2013 due to the unavailability of other data sources containing nonfederal-employee income. We also conducted interviews with the 25 households. Households we identified as potentially ineligible were referred to the USDA Office of the Inspector General for further examination.[8] Further details on our scope and methodology are included in the May 2014 report.[9] For the selected updates, in January 2015 USDA provided us information on the status of its implementation of our recommendations. The work upon which this statement is based was conducted in accordance with generally accepted

[7]The Washington, D.C., and Dallas, Texas, metropolitan regions ranked 1st and 18th, respectively, among the 50 metropolitan regions with the largest number of executive-branch federal employees during fiscal year 2012. The Washington, D.C., region includes Washington, D.C.; Maryland; and Virginia. We initially obtained data from 28 school districts for our review—14 located in the Dallas, Texas, metropolitan region and 14 in the Washington, D.C., metropolitan region, which includes Washington, D.C., and its Maryland and Virginia suburbs. In the Dallas, Texas, metropolitan region we selected school districts with student enrollment over 10,000 students. We selected all school districts in the Washington, D.C., metropolitan region excluding 56 charter school districts in Washington, D.C. However, we did not use data from 3 school districts—1 located in the Dallas, Texas, metropolitan region and 2 located in the Washington, D.C., metropolitan region—because the data were not reliable for our purposes. During the 2010–2011 school year, there were 57 school districts in Washington, D.C.; 49 in Maryland; 1,260 in Texas; and 154 in Virginia for a total of 1,520. This selection is not representative of all states, school districts, or school-meal participants. For our May 2014 report, we also selected 23 households that were directly certified in to the program in the selected school districts. Of the 25 selected school districts, 2 did not have any directly certified households that matched with federal-employee payroll data. Our analysis of the 23 directly certified households is not discussed in this testimony.

[8]In addition, we referred the cases to the appropriate school district and state oversight agency. As of May 2015, school districts had followed up on many of these referrals, while some were still under review. For example, one school district conducted for-cause verification of five households we referred as being potentially ineligible for school-meals benefits. As a result of this verification, all five households were removed from the program because they failed to respond to the verification request. Another school district to which we referred potentially ineligible households told us that it removed two households from the program after conducting verification.

[9]GAO-14-262.

government auditing standards and standards prescribed by the Council of the Inspectors General on Integrity and Efficiency.

Background

Within USDA, FNS has overall responsibility for overseeing the school-meals programs, which includes promulgating regulations to implement authorizing legislation, setting nationwide eligibility criteria, and issuing guidance. School-meals programs are administered at the state level by a designated state agency that issues policy guidance and other instructions to school districts providing the meals to ensure awareness of federal and state requirements. School districts are responsible for completing application, certification, and verification activities for the school-meals programs, and for providing children with nutritionally balanced meals each school day. The designated state agency conducts periodic reviews of the school districts to determine whether the program requirements are being met. Schools and households that participate in free or reduced-price meal programs may be eligible for additional federal and state benefits.

Household income levels determine whether children qualify for free or reduced-price meals. Children from families with incomes at or below 130 percent of the federal poverty level are eligible for free meals; the income threshold for a family of four was $28,665 in the 2010–2011 school year. Those with incomes between 130 percent and 185 percent of the federal poverty level are eligible for reduced-price meals. Income is any money received on a recurring basis—including, but not limited to, gross earnings from work, welfare, child support, alimony, retirement, and disability benefits—unless specifically excluded by statute.[10]

In addition, students who are in households receiving benefits under certain public-assistance programs—specifically, SNAP, Temporary Assistance for Needy Families (TANF), or Food Distribution Program on Indian Reservations (FDPIR)—or meet certain approved designations (such as students who are designated as homeless, runaway, or migrant;

[10]Income not to be counted in the determination of a household's eligibility includes, but is not limited to, the value of benefits under SNAP or Food Distribution Program on Indian Reservations (FDPIR), student financial assistance benefits, and loans. 78 Fed. Reg. 17628 (Mar. 22, 2013). Children from families with incomes over 185 percent of the federal poverty level pay full price, although their meals are still subsidized to some extent.

or who are foster children) are eligible for free school meals regardless of income.

USDA Has Taken Steps to Help Identify and Prevent Ineligible Participants from Receiving Benefits

In May 2014, we reported that USDA had taken several steps to implement or enhance controls to identify and prevent ineligible beneficiaries from receiving school-meals benefits.[11] For example:

- USDA worked with Congress to develop legislation to automatically enroll students who receive SNAP benefits for free school meals; SNAP has a more-detailed certification process than the school-meals program. For our May 2014 report, USDA officials told us that they were emphasizing the use of direct certification, because, in their opinion, it helps prevent certification errors without compromising access. Direct certification reduces the administrative burden on SNAP households, as they do not need to submit a separate school-meals application. It also reduces the number of applications school districts must review. The number of school districts directly certifying SNAP-participant children increased from the 2008 through 2013 school years. For example, during the 2008–2009 school year, 78 percent of school districts directly certified students, and by the 2012–2013 school year, this percentage had grown to 91 percent of school districts, bringing the estimated percentage of SNAP-participant children directly certified for free school meals to 89 percent. USDA was also conducting demonstration projects in selected states and school districts to explore the feasibility of directly certifying children that participate in the Medicaid program.

- USDA requires state agencies that administer school-meals programs to conduct regular, on-site reviews—referred to as "administrative reviews"—to evaluate school districts that participate in the school-meals programs. Starting in the 2013–2014 school year, USDA increased the frequency with which state agencies complete administrative reviews from every 5 years to every 3 years. As part of this process, state agencies are to conduct on-site reviews of school districts to help ensure that applications are complete and that the correct eligibility determinations were made based on applicant information. School districts that have adverse findings in their administrative reviews are to submit a corrective-action plan to the

[11] GAO-14-262.

state agency, and the state agency is to follow up to determine whether the issue has been resolved.

- In February 2012, USDA distributed guidance to state administrators to clarify that school districts have the authority to review approved applications for free or reduced-price meals for school-district employees when known or available information indicates school-district employees may have misrepresented their incomes on their applications.

USDA Could Explore Options to Enhance the Verification Process to Further Strengthen Integrity While Ensuring Legitimate Access

In our May 2014 report, we identified opportunities to strengthen oversight of the school-meals programs while ensuring legitimate access, including clarifying use of for-cause verification, studying the feasibility of electronic data matching to verify income, and verifying a sample of households that are categorically eligible for assistance.

For-Cause Verification

As described in USDA's eligibility manual for school meals, school districts are obligated to verify applications if they deem them to be questionable, which is referred to as for-cause verification.[12]

We reported in May 2014 that officials from 11 of the 25 school districts we examined told us that they conduct for-cause verification. These officials provided examples of how they would identify suspicious applications, such as when a household submits a modified application—changing income or household members—after being denied, or when different households include identical public-assistance benefit numbers (e.g., if different households provide identical SNAP numbers). However, officials from 9 of the 25 school districts we examined told us that they did not conduct any for-cause verification. For example, one school-district official explained that the school district accepts applications at face value. Additionally, officials from 5 of the 25 school districts told us they only conduct for-cause verification if someone (such as a member of the

[12] 7 C.F.R. § 245.6a(c)(7).

public or a state agency) informs them of the need to do so on a household. Although not generalizable, responses from these school districts provide insights about whether and under what conditions school districts conduct for-cause verifications.

In April 2013, USDA issued a memorandum stating that, effective for the 2013–2014 school year, all school districts must specifically report the total number of applications that were verified for cause. However, the outcomes of those verifications would be grouped with the outcomes of applications that have undergone standard verification. As a result, we reported in May 2014 that USDA would not have information on specific outcomes, which it may need to assess the effectiveness of for-cause verifications and to determine what actions, if any, are needed to improve program integrity. While USDA had issued guidance specific to school-district employees and instructs school districts to verify questionable applications in its school-meals eligibility manual, we found that the guidance did not provide possible indicators or describe scenarios that could assist school districts in identifying questionable applications.

Hence, in May 2014, we recommended that USDA evaluate the data collected on for-cause verifications for the 2013–2014 school year to determine whether 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. USDA concurred with this recommendation and in January 2015 told us that FNS would analyze the 2013–2014 school year data to determine whether capturing the results of for-cause verification separately from the results of standard verification would assist the agency's efforts to improve integrity and oversight. USDA also said that FNS would consider developing and disseminating additional guidance, as we recommended.

Income Verification

In addition to for-cause verification, school districts are required to annually verify a sample of household applications approved for free or reduced-price school-meals benefits to determine whether the household has been certified to receive the correct level of benefits—we refer to this

process as "standard verification."[13] Standard verification is generally limited to approved applications considered "error-prone." Error-prone is statutorily defined as approved applications in which stated income is within $100 of the monthly or $1,200 of the annual applicable income-eligibility guideline. Households with reported incomes that are more than $1,200 above or below the free-meals eligibility threshold and more than $1,200 below the reduced-price threshold would generally not be subject to this verification process.

In a nongeneralizable review of 25 approved civilian federal-employee household applications for our May 2014 report, we found that 9 of 19 households that self-reported household income and size information were not eligible for free or reduced-price-meal benefits they were receiving because their income exceeded eligibility guidelines. Two of these 9 households stated in their applications annualized incomes that were within $1,200 of the eligibility guidelines and, therefore, could have been selected for standard verification as part of the sample by the district; however, we determined that they were not selected or verified. The remaining 7 of 9 households stated annualized incomes that fell below $1,200 of the eligibility guidelines and thus would not have been subject to standard verification.

For example, one household we reviewed submitted a school-meals application for the 2010–2011 school year seeking school-meals benefits for two children. The household stated an annual income of approximately $26,000 per year, and the school district appropriately certified the household to receive reduced-price-meal benefits based on the information on the application. However, we reviewed payroll records and determined that the adult applicant's income at the time of the application was approximately $52,000—making the household ineligible for benefits. This household also applied for and received reduced-meal benefits for the 2011–2012 and 2012–2013 school years by understating

[13]Pursuant to statute, school districts are required to verify a random sample of applicants. The sample size is equal to the lesser of 3 percent of approved applications, selected from error-prone applications, or 3,000 error-prone applications unless an alternative sample size is used. For the purposes of standard verification, federal law defines error-prone applications as approved applications with monthly income within $100 of—or with annual income within $1,200 of—the income eligibility limits for free or reduced-price meals. Households that indicate categorical eligibility on an application and households that enter the program through direct certification are generally not subject to the standard verification process.

its income. Its 2012–2013 annualized income was understated by about $45,000.

Because the income stated on the application during these school years was not within $1,200 per year of the income-eligibility requirements, the application was not deemed error-prone and was not subject to standard verification. Had this application been subjected to verification, a valid pay stub would have indicated the household was ineligible.

One method to identify potentially ineligible applicants and effectively enforce program-eligibility requirements is by independently verifying income information with an external source, such as state payroll data. States or school districts, through data matching, could identify households that have income greater than the eligibility limits and follow up further. Such a risk-based approach would allow school districts to focus on potentially ineligible families while not interrupting program access to other participants. Electronic verification of a sample of applicants (beyond those that are statutorily defined as error-prone) through computer matching by school districts or state agencies with other sources of information—such as state income databases or public-assistance databases—could help effectively identify potentially ineligible applicants.

In May 2014, we recommended that USDA 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. We also recommended that, if the pilot program shows promise in identifying ineligible households, the agency 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. USDA concurred with our recommendations and told us in January 2015 that direct-verification computer matching is technologically feasible with data from means-tested programs, and that data from SNAP and other programs are suitable for school-meals program verification in many states. USDA said that FNS would explore the feasibility of using other income-reporting systems for program verification without negatively affecting program access for eligible students or violating statutory requirements. Depending on the results of the pilot program, USDA said that FNS would consider submitting a legislative proposal to expand the statutorily defined verification process, as we recommended.

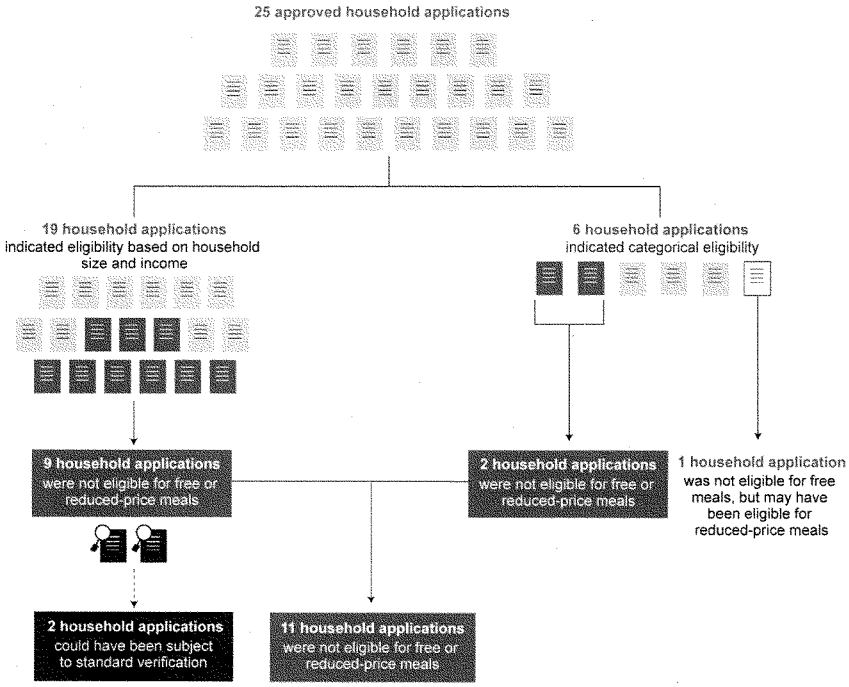
Verification of Categorical Eligibility

In May 2014, we found that ineligible households may be receiving free school-meals benefits by submitting applications that falsely state that a household member is categorically eligible for the program due to participating in certain public-assistance programs—such as SNAP—or meeting an approved designation—such as foster child or homeless. Of the 25 civilian federal-employee household applications we reviewed, 6 were approved for free school-meals benefits based on categorical eligibility. We found that 2 of the 6 were not eligible for free or reduced-price meals and 1 was not eligible for free meals, although that household may have been eligible for reduced-price meals.

For example, one household applied for benefits during the 2010–2011 school year—providing a public-assistance benefit number—and was approved for free-meal benefits. However, when we verified the information with the state, we learned that the number was for medical-assistance benefits—a program that is not included in categorical eligibility for the school-meals programs. On the basis of our review of payroll records, this household's annualized income of at least $59,000 during 2010 would not have qualified the household for free or reduced-price-meal benefits. This household applied for school-meals benefits during the 2011–2012 and 2012–2013 school years, again indicating the same public-assistance benefit number—and was approved for free-meal benefits.

Figure 1 shows the results of our review.

Figure 1: Results of GAO's Analysis of a Nongeneralizable Sample of Approved Applications



Source: GAO analysis of school-meals household applications. | GAO-15-594T

Note: There are two ways children may be classified as categorically eligible: (1) through participation in certain public-assistance programs, such as the Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF), or (2) through meeting an approved designation, such as homeless or foster child.

Because applications that indicate categorical eligibility are generally not subject to standard verification, these ineligible households would likely

not be identified unless they were selected for for-cause verification or as part of the administrative review process, even though they contained inaccurate information. These cases underscore the potential benefits that could be realized by verifying beneficiaries with categorical eligibility. In May 2014, we recommended that USDA explore the feasibility of verifying the eligibility of a sample of applications that indicate categorical eligibility for program benefits and are therefore not subject to standard verification. USDA concurred with this recommendation and told us in January 2015 that FNS would explore technological solutions to assess state and local agency capacity to verify eligibility of a sample of applications that indicate categorical eligibility for school-meals-program benefits. In addition, USDA said that FNS would clarify to states and local agencies the procedures for confirming and verifying the application's status as categorically eligible, including for those who reapply after being denied program benefits as a result of verification.

Chairman Roberts, Ranking Member Stabenow, and Members of the Committee, this concludes my prepared remarks. I look forward to answering any questions that you may have at this time.

GAO Contacts and Staff Acknowledgments

For further information on this testimony, please contact Stephen Lord at (202) 512-6722 or lords@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement. Individuals making key contributions to this testimony include Jessica Lucas-Judy, Assistant Director; Marcus Corbin; Ranya Elias; Gabrielle Fagan; Colin Fallon; Kathryn Larin; Olivia Lopez; Maria McMullen; and Daniel Silva.

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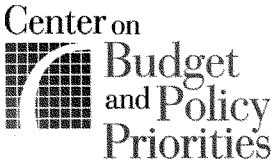


820 First Street NE, Suite 510
Washington, DC 20002

Tel: 202-408-1080
Fax: 202-408-1056

center@cbpp.org
www.cbpp.org

May 5, 2015

Testimony of Zoë Neuberger, Senior Policy Analyst, Before the Senate Committee on Agriculture, Nutrition and Forestry

Thank you for the invitation to testify today. I am pleased to be able to speak to you about accuracy and integrity in the school meal programs. I am Zoë Neuberger, a Senior Policy Analyst at the Center on Budget and Policy Priorities where I have worked for 14 years. We are a Washington, D.C.-based policy institute that conducts research and analysis on budget, tax, and economic policy, policies related to poverty, and a number of social programs. The Center has no government contracts and accepts no government funds.

The National School Lunch and School Breakfast Programs play a critical role in ensuring that our nation's children are well nourished so they can learn and thrive. On a typical school day, these programs provide meals to more than 30 million children, nearly three in four of whom (72 percent) qualify for free or reduced-price meals due to their families' economic circumstances. Despite improvements in the economy since the recession, many families continue to struggle to afford basic necessities, like food and housing, each day. Nearly 16 million children live in a household experiencing food insecurity; 8.5 million children live in a household where children, not just adults, experience food insecurity. The federal food assistance programs, including school meals, play an important role in shielding children from hunger.

Hungry children can find it hard to focus and to perform in the classroom. School meals can help make their time in school more successful. Research shows, for example, that eating breakfast at school improves student achievement, diet, and behavior. In addition to helping meet children's immediate needs, the school meal programs yield longer-term benefits. Low-income children are more likely to face chronic health and developmental difficulties, which can have lasting negative consequences. Receiving healthy meals at school can mitigate the risk.

Making sure that eligible low-income children can access breakfasts and lunches, which support a successful school day and healthier lives, is the most fundamental goal of the school meal programs. We recommend that the Committee place top priority during the reauthorization process on strengthening the programs to ensure that they continue meeting the needs of eligible low-income children.

At the same time, the programs must also endeavor to ensure that federal meal subsidies are provided only for meals that meet program requirements and only to children who qualify for them. Delivering the correct benefit to each child is a fundamental aspect of sound stewardship and a core

responsibility of the programs. Moreover, public support of these very important programs is compromised if federal funds are not used as intended due to problems with program administration and operation.

My testimony will address this issue in four sections: a review of the school meal eligibility determination and counting and claiming processes, a discussion about the kinds of errors that occur during these processes, a review of the efforts in the 2004 reauthorization law to address errors, and a framework for assessing error-reduction policy proposals, including steps already taken as well as recommendations for areas to explore to make further progress on improving program accuracy.

Eligibility for Federal School Meal Subsidies

Generally, public or nonprofit private schools may participate in the school lunch or breakfast program. The school districts that choose to take part get cash subsidies from the U.S. Department of Agriculture (USDA) for each meal they serve; they also receive some foods for each lunch they serve. In return, they must serve meals that meet federal requirements and must offer free or reduced-price meals to eligible children.

TABLE 1

School Breakfast Program 2014-2015 Reimbursement Rates*

Meal Category	Rate**
Free	$1.62
Reduced Price	$1.32
Paid	$0.28

*These rates apply in the contiguous states. For the higher rates for Alaska and Hawaii, see http://www.fns.usda.gov/sites/default/files/cn/NAPs14-15chart.pdf.

**Schools that serve more than 40 percent of their lunches to children who qualify for free or reduced-price meals (among other criteria) receive an extra 31 cents in "severe need" reimbursement for each free or reduced-price breakfast.

Any child at a participating school may purchase a meal through the National School Lunch Program or the School Breakfast Program. Children from families with incomes at or below 130 percent of the poverty level are eligible for free meals. Those with incomes above 130 percent and at or below 185 percent of the poverty level are eligible for reduced-price meals, for which students can be charged no more than 40 cents for lunch or 30 cents for breakfast. (For the period July 1, 2014, through June 30, 2015, 130 percent of the poverty level is $31,005 for a family of four; 185 percent is $44,123.) Children from families with incomes over 185 percent of poverty pay a full price, though their meals are still subsidized to some extent. Local school food authorities set their own prices for full-price (paid) meals but must operate their meal services as non-profit programs.

TABLE 2

National School Lunch Program 2014-2015 Reimbursement Rates*

Meal category	Rate**
Meal Category	$2.98
Free	$2.58
Reduced Price	$0.28
Paid	

* These rates apply in the contiguous states. For the higher rates for Alaska and Hawaii, see http://www.fns.usda.gov/sites/default/files/cn/NAPs14-15chart.pdf.

**School districts that serve more than 60 percent of their lunches to children who qualify for free or reduced-price meals receive an extra 6 cents per meal for each meal category. Each meal, regardless of category, also receives 24.75 cents worth of commodities from the federal government.

Most of the support USDA provides to school districts through the school meal programs takes the form of a cash reimbursement for each meal served. School districts receive no additional federal funds for administrative costs. Tables 1 and

2 show the current (July 1, 2014 through June 30, 2015) basic cash reimbursement rates for breakfasts and lunches.

Eligibility Determination Process

Schools must determine which subsidy category students qualify for through an eligibility process. A single determination is made for breakfast and lunch. Federal rules govern eligibility determinations, although they are operationalized in different ways across the roughly 100,000 schools that participate in the meal programs. These schools are spread across over 13,000 school districts, which range from small rural, or charter, districts with a single school to large school systems that serve hundreds of thousands of students daily.

Certification

When possible, children are approved for free meals based on information from another program, a process known as "direct certification." Children receiving Supplemental Nutrition Assistance Program (SNAP, formerly food stamps) or cash assistance benefits, for example, can be directly certified based on a data-matching process between a student database and the state's human services database. Children who are homeless can be directly certified if identified by the district's designated "homeless liaison." Once approved, children remain eligible for free meals for the rest of the school year, even if household circumstances change.

Children who are not directly certified and whose parents seek help from the free or reduced-price meal programs must apply. The application is often distributed as part of the package of enrollment forms at the start of the school year. Parents typically complete these forms on their own, without assistance. If they have a question about whether to include a certain kind of income, what "gross" income means, or whether to list a relative who's staying with them, clarifications may not be readily available. They could try to find the instructions online or seek out someone at the school to help, but they may instead do their best to provide the information they believe is asked for. If they make a mistake, it would be considered a "household error" that may affect eligibility.

Once a family submits an application, someone at the school or district must review it to calculate household size and income and compare them to federal poverty guidelines. Reviewing applications is rarely a school district employee's expertise or full-time job, as meal applications are submitted and processed primarily in the weeks just before the school year starts. Often, school officials process applications for just a small portion of the year while juggling many responsibilities. If the data from a paper application has to be entered into an electronic system, data entry errors can be made. When adding up income for multiple sources and multiple people, math errors can be made. More and more schools use electronic systems, which reduce opportunities for such errors, but many families still submit paper applications, and in some places that is the only option.

Verification

Once a child is approved based on an application, he or she receives free or reduced-price meals for the remainder of the school year unless the application is selected for eligibility verification. Under the annual verification process, a small sample of applications is selected and the school district must make sure that a correct determination was made based on the information on the application; then, the district confirms the child's eligibility again by obtaining documentation from a third party or the family. Verification is an important part of the eligibility process. It helps

reinforce to districts and families the importance of accurate eligibility determinations. And, when the verification process catches errors, it can provide useful information to program operators about potential deficiencies in application and review processes.

If the school district cannot verify eligibility from a third-party source such as the state's human services office (which can inform the school whether the child is enrolled in SNAP, cash assistance, or Medicaid), it must contact the household to ask for documentation of the child's eligibility. If the household does not respond, the child's free or reduced-price meals are terminated. If the household provides satisfactory documentation, the district uses it to assess whether the child may continue to receive free or reduced-price meals.

Usually the verification sample is 3 percent of approved applications (capped at 3,000 in larger districts), selected from applications where monthly income is within $100 of the limit for free or reduced-price meals. The law targets those with reported income close to the limit because these applications are considered error prone. The process also is designed to encourage districts to obtain documentation from households. This is important because:

- The goal is to verify households' eligibility by reviewing their circumstances.
- Some households may need assistance to understand the verification process.
- Children in households that do not reply lose access to free or reduced price school meals.

To encourage districts to obtain verification rather than terminate benefits to households, districts that successfully lower their non-response rate can choose the next year between a smaller sample size and selecting the sample at random from all approved applications, either of which is easier than the standard approach.

For the 2013-2014 school year, 35 percent of families selected for verification did not respond and their children stopped receiving free or reduced-price meals, regardless of whether they were actually eligible. The initial eligibility determination was confirmed for 38 percent of verified applications, changed for 24 percent to reduce the subsidy level, and changed for 2 percent to raise the subsidy level. It is important to note that these rates cannot be applied to the whole program because the verification system focuses on the most error-prone certifications.

In addition to this standard annual verification process, school districts must seek documentation of eligibility from applicants if they have reason to believe that the information on a household application is incorrect. This may occur, for example, if a parent employed by the school district does not list his or her correct income information or if the family has completed another form and provided different information. This is called "verification for cause."

GAO's 2014 report on school meal verification, *USDA Has Enhanced Controls, but Additional Verification Could Help Ensure Legitimate Program Access*, and this week's report from USDA's Office of the Inspector General on its audit of the National School Lunch and School Breakfast Programs, noted that some school districts do not use verification for cause because they are uncertain about the circumstances under which it is permitted. USDA issued guidance in February 2012 clarifying that school districts may use data on the salaries of district employees to identify applications with questionable income data for purposes of conducting verification for cause and added examples of

appropriate circumstances in which to conduct verification for cause in the August 2014 *Eligibility Manual for School Meals.*

If a child's free or reduced-price meals are terminated as a result of verification, the family can reapply at any time but must provide income documentation along with the application.

Counting and Claiming Process

As noted above, in order for a meal to qualify for a federal subsidy, the school must ensure that the meal meets basic federal nutrition standards, count the meal to obtain reimbursement, and identify whether the child qualifies for the free, reduced-price, or paid subsidy rate. If the child is in the paid category, the school's meal fee is also collected. The counts of children by meal category must be tallied across schools and then submitted by the district to the state child nutrition program office for reimbursement. This aspect of the program is called the "counting and claiming process." It is another area where errors can occur.

Most of the aforementioned activities typically occur at the "point of service," which may be a cafeteria checkout line or the classroom. This process can be rushed. In many districts, students have less than 30 minutes for lunch, which includes time to wait in line, select their food, stop at the register, and eat. In some districts, the person operating the register may have little training or support. Errors in this area, known as "operational errors," are therefore not surprising. Research show that they tend to be concentrated in a limited number of school districts.

Overall, the processes for making eligibility determinations as well as counting and claiming meals for correct reimbursement aim to maximize program accuracy while being navigable for families and administratively feasible for schools and cost-effective for the program.

Assessing Program Errors

USDA oversees the annual verification process and monitors school meal program accuracy. Every few years, USDA conducts the *Access, Participation, Eligibility and Certification* (APEC) study; the one released this week examined the 2012-2013 school year and built on one for the 2005-2006 school year. This study entails a comprehensive review of program accuracy with respect to eligibility and reimbursements. Household interviews are conducted to determine whether students were certified for the right category and whether the verification process resulted in needed corrections. Monitors observe cafeterias to determine whether only meals that meet nutrition standards are reimbursed and to determine whether schools count and claims meals accurately. The report helps make transparent the areas where errors occur and the ways in which state child nutrition and district officials can help schools improve accuracy.

The APEC report serves as a comprehensive audit of how well the program is managing each of these steps. In addition, it helps clarify the types of errors that occur:

- Certification errors that result from household errors, including math errors, unintentional mistakes, and deliberate misreporting;
- Certification errors that result from school clerk errors, including data entry errors, math errors, and fraud; and

- Counting and claiming errors, including reimbursements for meals that do not meet nutrition standards and math errors when tallying meals across a district or state.

In each category, APEC disaggregates overpayments and underpayments, which allows for a calculation of net costs and helps target interventions. Although the overall extent of improper payments remains consistent with the levels found in the earlier study, the share of children approved for the wrong meal category has been reduced slightly and errors associated with incorrectly tallying meal counts have been greatly reduced.

Certification Errors

Certification errors are mistakes by school staff or parents that cause children to receive higher or lower subsidies than they qualify for.

Household errors can result when a parent reports take-home pay net of withholding, instead of gross pay, on a school meal application or calculates a household's monthly income by multiplying its weekly income by 4 instead of 4.33 (the number of weeks in the average month). Consider a household of four with weekly earnings of $610. Calculating their monthly income by multiplying that figure by 4 would result in $2,440, whereas multiplying by 4.3 would result in $2,623. The former monthly income qualifies for free meals; the latter qualifies for reduced-price meals.

Similarly, forgetting to include a household member, such as a grandparent, on an application can result in overstating the household's income relative to the poverty line. As a result, the children in the household might get a lower subsidy than they qualify for.

Household errors also include intentional misstating of income in order to qualify for free or reduced-price meals. There is often no way to distinguish an accidental misstatement of income from a deliberate one, but it is important to recognize that most errors are likely unintentional. Nearly three-quarters (74 percent) of the underpayments associated with certification errors that APEC found for the 2012-2013 school year resulted from incorrect reporting by households. Because these households are unlikely to have deliberately reported information that reduced their own benefits, this finding highlights some parents' difficulty in understanding school meal applications.

Examples of administrative certification errors by school districts include transposing a number when entering data from a paper application into a data management system, applying the wrong income threshold, and making a math error when combining income obtained from multiple sources at different frequencies.

Operational Errors

While the focus of the May 2014 GAO report and this week's OIG report is the eligibility determination process, it is important to keep in mind that eligibility is only one source of program error. Operational errors are administrative mistakes by cashiers or school administrative staff that result in miscounts of the number of subsidized meals served in a given category. Typical examples include counting a meal that does not meet the nutritional requirements for reimbursement or incorrectly adding up the number of meals served at all schools in a district or state. The kinds of

training and administrative oversight needed to prevent errors like these are very different than the kind of policy responses that can reduce certification error.

Operational errors can happen when the cafeteria is crowded and there is limited time to move many students through. There can also be trade-offs between reducing errors and reducing plate waste. If the server puts required foods on the plate with no student choice, there's less room for error and the line moves more quickly. Children, however, may not eat as much as they would if they had some choice and may throw away unwanted items. Likewise, putting robust checks in place at the register to ensure that each meal is categorized and counted correctly can cause the line to move more slowly, leaving children with less time to eat or necessitating that districts extend the lunch period.

Operational errors are also more likely in school systems that have less technological capacity and rely more heavily on paper processes. If the cashier has to check off each student on a paper list of all students and then make sure the meal meets nutritional standards, the process is more time consuming and error prone than if all students enter their personal account number (which tracks meal categories) into an automated system while the cashier checks the meal. Similarly, adding up the number of meals served by category across schools and days via a paper system creates opportunities for simple math errors. Minor mistakes can also occur in small schools when the cafeteria worker misses a day of work and someone else, often a front-office staffer or the principal, steps in to check out students during the lunch period.

To be clear, most schools count and claim meals correctly every day. But it is important to understand how the design and staffing of the system across 100,000 schools each day can contribute to honest errors.

Underpayments and Overpayments

It is also important to keep in mind that improper payments include underpayments as well as overpayments. The APEC study found that as a result of certification errors, 12 percent of children who applied for school meals received higher subsidies than they were eligible for. But certification errors also resulted in 8 percent of applicants getting *lower* subsidies than they were eligible for, causing them to miss out on needed benefits. And, the improper denial rate is very high. More than one-quarter of the children who were denied free or reduced-price meals should have received them.

While underpayments have the negative consequence of needy children not getting the meals for which they are eligible, they do lower federal costs. To identify the cost of errors to the federal government, one must subtract underpayments from overpayments to obtain a net figure. The net cost to the federal government of the errors studied was about $1.4 billion.

Making Sense of Different Errors

Adding up the different kinds of improper payments does not clarify the best ways to improve program accuracy and accountability. Different types of errors require different interventions. A math error by a school official requires a different response that a math error by a family. An antiquated paper application system requires a different response than a cashier who isn't properly trained to identify meals that meet federal standards. And different kinds of responses have widely different costs.

Errors that result from design or operational flaws, such as confusing forms or lack of time for meals, may be addressable through modest design improvements that may not cost much or through technical assistance on best practices. Errors that result from poorly trained staff or lack of automation can require significant investments. Errors that result from individuals seeking to defraud the program are likely specific to small numbers of individuals and typically require more targeted interventions.

To prioritize, it's important to look at the magnitude and scope of different kinds of error. Policymakers also must consider how much in new funds it makes sense to invest in error reduction and whether those resources are best devoted to error reduction at all. The Center on Budget and Policy Priorities' focus is to develop error-reduction strategies that do not cause eligible low-income children to lose free and reduced-price meals, do not overly burden schools that are already stretched thin trying to educate children, are effective and adequately financed, and do not cost more than they save.

Efforts in the 2004 Reauthorization to Address Certification Error

As Congress began developing the reauthorization legislation eventually enacted in 2004, some policymakers were concerned that ineligible children were being approved for free or reduced price meals. Some suggested mandating that schools verify a larger share of approved applications. School officials, in turn, were deeply concerned at the possibility of new unfunded mandates and many believed that such efforts would cause eligible low-income children to lose access to school meals.

Research had consistently shown that a substantial portion of families that do not respond to the verification notice are actually eligible for free or reduced-price meals. They may fail to respond because they don't receive the notice, cannot read it, do not understand it, or are reluctant to share income information with school staff. We also worry that parents may not understand the consequences of failing to respond — particularly if their children do not inform them that they have lost eligibility for free or reduced-price meals or if the school begins charging parents but doesn't send home a bill for several weeks.

To inform the reauthorization debate, USDA conducted several studies on the impacts of expanded verification. It briefly described its findings in *NSLP Certification Accuracy Research — Summary of Preliminary Findings* in 2003 and several volumes detailing each study. We summarized them in a 2003 report *What We Have Learned from FNS' New Research Findings about Overcertification in the School Meals Programs.* As with GAO's May 2014 report and this week's OIG report, these studies did not involve nationally representative samples, but their findings can inform policy development.

- Expanded income documentation requirements did not reduce the extent to which ineligible children were certified to receive free or reduced-price meals.
- Expanded income verification requirements led substantial numbers of *eligible* children to lose free or reduced-price meals. In metropolitan areas, children in more than one of every three families selected for income verification lost their free or reduced-price meal benefits despite being eligible. For every *in*eligible child that lost benefits as a result of verification, at least one *eligible* child lost benefits as well.

As a result of these findings, Congress wisely focused on reducing opportunities for error and strengthening the verification process, rather than expanding verification or income documentation. In the Child Nutrition and WIC Reauthorization Act of 2004, the focus of verification sampling was shifted to error-prone applications (those close to the income limits for free or reduced-price meals). School districts were permitted to use Medicaid data to verify eligibility.

School districts were also required to follow up with households that do not initially respond to the verification notice. Despite an increased focus on obtaining responses to verification notices, more than one in three families selected for verification (35 percent) for the 2013-2014 school year did not respond. While some were likely ineligible, the research indicates that many eligible families likely lost access to school meals or reapplied following the verification process, which creates more paperwork for schools.

These findings also reveal why the recommendation in this week's OIG report to require income documentation at the time of application is unlikely to effectively prevent certification errors but would substantially increase the workload for school districts and result in eligible low-income children not applying for free or reduced price school meals. USDA found that requiring income documentation at the time of application, which was then used to certify students, did not reduce the extent to which ineligible children were approved for free or reduced price meals, which is the main argument in favor of this policy noted in the OIG report. But having to gather such documentation did deter eligible families from applying.

Even if districts did not use the documentation unless the application was selected for verification, as the OIG report recommends, collecting, managing, and storing large quantities of new documentation would create a significant new workload for school districts. They would need a process for maintaining documents submitted with applications, which are currently usually only a single page. They would need more file storage capacity or an electronic scanning and document management system. They would also need to ensure that sensitive personal information, such as that on pay stubs, was kept securely and that all confidentiality protocols were followed.

Framework for Strengthening Program Integrity

We encourage the Committee to consider ways to continue supporting a culture of accountability and continuous improvement in the school meal programs at every level of administration — federal, state, and local. Given what we know about the programs' role in addressing child hunger, the challenges for resource-constrained schools in determining eligibility and claiming reimbursements, the extent of errors in different aspects of the program, and previous efforts to improve program accuracy, there is ample information to guide new initiatives in this area.

USDA's APEC report shows that there is significant room to improve program accuracy — and that school districts and state child nutrition programs can do so without compromising access for the most vulnerable children or imposing unreasonable burdens on schools and states. We know this because many districts and states have strong track records regarding certification and operational errors. Congress and USDA can work to better understand what distinguishes them from places that struggle with errors. Policymakers can use this information to equip the program at all levels with the resources and oversight needed to continue improving.

These efforts will likely require new investments to build administrative systems that prevent and catch errors, help train the hundreds of thousands of school food service and school district employees that oversee program operations, identify sound practices that can be exported from one successful system to another, and experiment with new methods of identifying and curbing errors and fraud.

We strongly recommend that that any new policy or effort to reduce improper payments be assessed against the following criteria:

- **Does it have a demonstrated impact on reducing error?** We can learn a great deal from districts and states that are successful in reducing errors and, where possible, export their practices to others.
- **Will it maintain program access for the most vulnerable children?** School meals are critical to children's immediate needs and long-term development. Strengthening program integrity must not come at the expense of ensuring that every low-income child receives needed nutrition.
- **Is it feasible?** High-quality information technology systems or reduced staff turnover due to competitive pay may have helped some districts lower error rates but may be too costly for all districts to adopt. Simplifying the school meal application with helpful instructions may be a much better solution to confusing applications than purchasing an expensive new online system. Likewise, a more time-consuming documentation or verification system might catch more errors but require school staff district staff to spend considerably more time on school meal eligibility determinations at the expense of other educational priorities.
- **Is it cost-effective?** The cost of an ineligible child getting free lunches and breakfasts for a school year is between $700 and $800; efforts that target infrequent problems could easily cost more than they save. Providing local school food officials with a clear message that program accuracy is important, that it will be measured, and that state child nutrition officials and USDA will support local program managers in their efforts to implement needed improvements, builds a stronger system in the long run than punitive policies.

Fortunately, the APEC report and recent efforts to address program errors offer a strong menu of ideas to explore as a part of reauthorization.

Reducing Opportunities for Error

Preventing errors rather than correcting them after the fact, is an important way to improve program accuracy. In the context of school meal eligibility determinations, the simplest way to reduce errors is to import an eligibility determination from another program, a process known as "direct certification." This increases the accuracy of determinations and reduces the workload for school staff, allowing them to spend more time with applications that were actually necessary. Yet for the 2012-2013 school year, 1.7 million children approved based on applications should have been directly certified through data matching with state human services programs; all of these children could be directly certified.

Meaningful progress to reduce the subset of errors that result from placing children in the wrong meal category (free, reduced-price, or paid) can be made by finding ways that ensure low-income

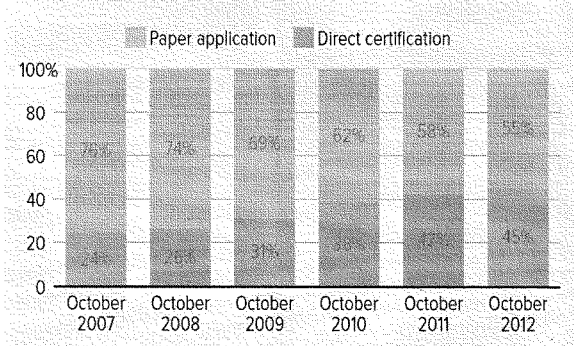
children who are known to be eligible for free school meals are certified for that category by leveraging more robust determinations of income done by other programs that specialize in reviewing income and household circumstances. In contrast to professional eligibility workers for other public benefit programs, who focus daily on assessing family income and generally have a wider array of information available, school staff are ill-equipped to make such determinations. Using data from other programs meets the criteria described above — it has been shown to improve accuracy, it does not impede access, it is feasible, and it is cost-effective.

Over the last decade, the school meal programs have made increasing use of highly accurate data from other programs, abetted by provisions in the last two reauthorization laws. Relying on such data reduces the number of school meal applications, often paper applications, that schools have to certify and verify. This reduces opportunities for error and gives school personnel more time to focus on the applications submitted through the traditional process.

- There has been steady improvement in and expansion of the use of "direct certification" — approving children for free meals based on highly accurate data from another program, the largest of which is the Supplemental Nutrition Assistance Program (formerly known as food stamps). Direct certification improves the accuracy of eligibility determinations while reducing paperwork for schools and families. For the 2007-2008 school year, 76 percent of children approved for free or reduced-price meals were approved based on a paper application. As shown in Figure 1, by the 2012-2013 school year, the share of paper applications had fallen to 55 percent. As a result, even though 4 million *more* children were approved for free or reduced-price meals that year due to the recession, school districts processed applications for 2.5 million *fewer* children.

FIGURE 1

Share of Children Approved for Free or Reduced-Price School Meals Based on Direct Certification* or Paper Application



*Direct certification = approving children for free meals based on data from another program, such as SNAP (food stamps).

Source: CBPP analysis of U.S. Department of Agriculture data.

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- A new option known as "community eligibility" allows schools with large concentrations of low-income students to be reimbursed on the basis of the share of students that are directly certified if they serve all meals at no charge, which eliminates the need for meal applications altogether and thereby greatly simplifies program administration. This new option builds on decades-old options under the National School Lunch Act to allow high-poverty schools to serve all meals at no charge. As a result, these schools have fewer opportunities for administrative errors and can shift resources from paperwork to improving their program.

Additional Program Integrity Measures

Strengthening program rules so that school meal subsidies flow to meals and children that qualify for them is important. Such changes must meet the criteria described above by responding to specific issues without impeding low-income children's access to free or reduced-price meals or overly burdening schools, which already face many challenges when educating low-income children. Cost and cost-effectiveness are also important considerations. The funds needed to equip tens of thousands of schools with modern technology for online applications, access to third-party data sources, automated checkout lines, quality counting and claiming software, and training either require new federal investments or the cost would have to be covered within the meal budget in many districts.

Over the last decade, many carefully designed program integrity measures have been implemented. In addition to the 2004 changes to the verification process described above, the following well-tailored measures strengthen program integrity without impeding access or overly burdening schools.

Improving Direct Certification

As explained above, direct certification has been improved and expanded to reduce opportunities for certification error by reducing the number of children approved for free meals based on an application.

- States or school districts are required to conduct a minimum of three electronic data matches using SNAP records each year, with more frequent matching encouraged.
- USDA must issue an annual report analyzing state performance and highlighting best practices.
- The Healthy, Hunger-Free Kids Act of 2010 established performance benchmarks, requiring states to directly certify 95 percent of the school-age children in households receiving SNAP benefits.
- States that do not meet the direct certification performance standards are required to develop a Continuous Improvement Plan (CIP) identifying action steps, a timeline for implementing them, and measures to assess progress.
- Direct certification improvement grants have been available to help states improve their data-matching hardware or software and train school districts on direct certification.
- High-performing states and those that made substantial improvements in their direct certification performance have received bonus awards.

- Seven states participate in a demonstration project permitting them to use Medicaid data to directly certify eligible low income-children for free school meals.

Simplifying the School Meals Application to Reduce Errors

While applications must follow program rules and USDA makes a model available, school districts are not required to use a particular form. We have conducted several thorough reviews of applications over the last decade and found that many are confusing. They may be incomplete or imply that parents need to provide information that is not necessary. They are rarely translated into languages other than Spanish, even though USDA provides translations in 33 languages. The instructions are often in a separate document and use legalistic language that is hard to understand. As a result, families may make mistakes because they simply do not understand what is being asked of them and school nutrition staff may spend time following up with families to explain the forms.

It is important to help school districts improve their applications so families can understand them and staff can obtain the information they need. To reduce incidents of certification error due to household misreporting of information, USDA is improving its model application.

- Just last month, USDA released a newly designed prototype meal application, which includes clearer instructions on the form itself; separate instructions provide specific details about more complicated issues like the kinds of income that must be reported. The new design is also meant to reduce mistakes by school nutrition staff when reviewing applications. The new design will likely be broadly adopted, since many state model applications and large district applications have closely followed USDA's prototype in the past. USDA plans to assess understanding of the new application by households and school nutrition staff once it is in use in order to continue to improve it.
- USDA has announced plans to develop a prototype electronic application, which has never been available. Existing electronic applications do not take full advantage of the ways in which the electronic environment could simplify the application and provide more detailed instructions to elicit accurate information. By developing a prototype, USDA can reduce household errors. Moreover, states could incorporate the new electronic prototype into online application systems that offer the potential for prompt comparison to other data sources to identify inconsistencies.

Strengthening Districts with High Rates of Certification Error

School districts with high rates of incorrect eligibility determinations warrant more support and intervention from state child nutrition staff and USDA. To reduce instances of certification error due to administrative mistakes, oversight has been strengthened.

- Under the Healthy, Hunger-Free Kids Act of 2010, school districts identified by state child nutrition officials as having high error rates regarding eligibility determinations based on applications must conduct a second, independent determination before approving any household for free or reduced-price meals. This is a targeted intervention designed to prevent errors from resulting in improper payments.
- USDA has established an Office of Program Integrity for Child Nutrition Programs, which will develop and test policies and practices to strengthen program integrity. This office is involved

in improving USDA's prototype application. Dedicating federal staff to reducing program error sends a strong signal to state and local school food administrators that USDA values a culture of accuracy and continuous improvement.

Identifying and Addressing Operational Error

Errors that result from claiming reimbursement for meals that do not meet federal standards are concentrated in a relatively small number of school districts and can be addressed through targeted training and technical assistance. But maintaining low levels of operational errors amidst changing program rules and frequent staff turnover requires a commitment to ongoing training and oversight. Over the last decade, investments have been made in this kind of continuous improvement, which keeps counting and claiming error rates low in most places.

- As a result of the Child Nutrition and WIC Reauthorization Act of 2004, state child nutrition staff were required to conduct reviews focused solely on strengthening administrative processes in selected school districts with, or at risk of, high error rates. Under the Healthy, Hunger-Free Kids Act of 2010, these administrative reviews were incorporated into a more rigorous, risk-based review process that addresses all aspects of program management. Reviews are now conducted more frequently (every three years rather than every five years), the areas to be reviewed have been updated, and USDA is developing ways to use the results of the reviews to strengthen program management.
- Under the Healthy, Hunger-Free Kids Act of 2010, USDA developed new professional standards with regard to continuing education and training for school nutrition staff. One goal of the new standards is to reduce program error and improper payments.
- The Child Nutrition and WIC Reauthorization Act of 2004 established a $4 million annual grant program focused on reducing administrative error. USDA distributes the funds through a competitive process to states for technology improvements and to identify, review, monitor, and train school districts that have demonstrated a high level of, or a high risk for, administrative error. For example, the Kansas Department of Education received a $1.3 million grant to update its online claiming and review management system and improve staff training regarding counting and claiming accuracy. These grants are likely partly responsible for the decrease in meal aggregation errors found in the recent APEC study.

Future Improvements

The reauthorization process offers an opportunity to identify new ways to support school districts' efforts to reduce errors in the school meal programs and build a shared culture of accuracy and accountability. Once we have had time to review the APEC study, just released this week, more thoroughly, it may point the way toward additional promising ideas. In the meantime, we recommend that the Committee consider the following ideas for further exploration:

- **Electronic applications.** Electronic applications are becoming more prevalent in the school meal programs. In 2011, about one-third of the 100 largest school districts provided an electronic application; by 2013, about two-thirds did. But existing applications do not take full advantage of the opportunity to simplify the process, provide more detailed instructions as needed, or check income data against other sources. USDA's plan to development a model electronic application is a very promising way to improve the quality of electronic applications

and the information parents provide on them. States could then explore whether electronic applications could be linked to other data sources to pre-populate certain fields or flag inconsistent information. Congress may also want to provide funding to support districts that cannot afford to build an online application platform on their own. With small grants, many districts might be able to adapt USDA's electronic form and software in lieu of building or buying new applications.

- **Improved direct certification of SNAP and TANF recipients.** Children who receive SNAP or TANF cash assistance benefits who were not certified based on the direct certification data-matching process can submit an application with the household's SNAP or TANF case number. As direct certification improves, the number of applications that include a case number is shrinking. Nonetheless, for the 2012-2013 school year there were 1.7 million children approved based on applications with case numbers. The May 2014 GAO report recommends verifying or reviewing a sample of these applications. Because all of these applications should have been directly certified and there should be fewer of them each year, it does not make sense to establish a new verification process focused on them. A better approach would be to explore whether school districts should be required to develop a process for attempting to directly certify such applications, which some districts already do, by working with a state or local human services agency. If that process reveals that the human service agency cannot confirm benefit receipt, then the application would meet the existing criteria for verification for cause and the school district could follow up that way.

- **Expanded direct certification.** As noted above, seven states (California, Florida, Illinois, Kentucky, Massachusetts, New York, and Pennsylvania) are participating in a demonstration project that allows them to use Medicaid data to identify children eligible for free school meals. This option should be available to all states and school districts. Approximately 3.5 million children receive Medicaid but not SNAP or TANF cash assistance and have income low enough to qualify for free school meals. Making use of the robust eligibility determination already made by Medicaid would allow more children to be directly certified, further reducing the number of applications that school districts must review and verify.

- **Improper denials**. USDA's APEC study found that one in four applications that were denied free or reduced-price meals should have been approved based on actual household circumstances. To date, verification has focused on correcting improper approvals for benefits. It is equally important, if not more so, to correct improper denials. Methods of checking a sample of denied applications should be explored.

- **Data-matching to determine the verification sample verification.** The 2004 reauthorization law encouraged school districts to "directly verify" eligibility using data from other public benefit programs and permitted the use of Medicaid data for this purpose. If eligibility can be confirmed based on data from these programs, the school district does not have to contact the household, which reduces the paperwork burden for schools and low-income families. But these data are used once the verification sample has been selected. GAO's May 2014 report recommended using data-matching to *select* applications for verification. While this could prove to be a more effective approach than the current focus on applications near the income limits for free and reduced price meals, it needs to be explored further. Promising sources must be identified that have data recent enough to match the time period when the application was completed and can successfully be matched using the data elements available on meal applications. The cost-effectiveness of verifying applications based

on discrepancies of various sizes would need to be explored. And policies would need to be developed to ensure that children do not lose benefits unless their parents have been given ample opportunity to explain or document any discrepancy. Once these factors have been explored, policy makers could consider whether to expand the share of applications verified using this approach, as recommended by the GAO, which would increase the workload for school districts, or instead substitute it for the current focus on error-prone applications.

- **Expanded direct verification.** School districts are already permitted to use data from SNAP, Medicaid, and the Temporary Assistance for Needy Families cash assistance program to verify eligibility without having to contact households. Additional data sources could be explored, such as state tax or wage databases. For example, a pilot could be conducted in a large district with the technological capacity to explore the feasibility of linking these data bases with student databases or school meal program systems and, if this is possible, whether the share of applications that can be directly verified can be increased. Data-matching, however, is a complex process. Often the information available from third-party sources, such as state wage databases or private wage data sources, is not available in formats that are easily translatable to the school meals household. School staff would need to be trained on the implications of accessing private data (including having appropriate security measures in place) and using the data appropriately in a school meal programs context.

- **Verification for cause.** Both the May 2014 GAO report and this week's OIG report highlighted the limited use of verification for cause in some districts and recommended that USDA develop further guidance regarding its use. Further guidance would help school districts understand when it is appropriate to conduct verification for cause and provide safeguards to ensure that it is not used in a discriminatory manner. During the 2013-2014 school year, about 1,600 school food authorities out of nearly 20,000 that submitted data to FNS made use of verification for cause. Other districts could certainly benefit from using verification for cause in appropriate circumstances. It is worth exploring, for example, whether it would be beneficial to routinely verify for cause any application submitted by a household that was found to have misreported income during the prior year's verification process, as recommended in the OIG report. It would not be wise, however, to routinely verify for cause any application for which benefits were reduced or terminated as a result of the verification process, as further recommended in the OIG report. Of the students whose benefits were reduced or terminated as a result of the 2013-2014 verification process, three in five lost benefits due to non-response, not because the school district found misreporting.

- **Data mining.** It is worth exploring whether data mining, a process by which statisticians look for unusual patterns in data, could be used to identify potential fraud by finding patterns in applications; in a district that houses applications in an automated system, for example, it might be possible to identify applications that appear suspicious. Again, this approach could be tested in a large district with both a school meal data system into which income information is entered and the technological capacity for data mining.

Conclusion

The school meal programs help shield children from hunger and prepare them to learn and thrive. To keep these programs strong, it is important to make sure that program rules are sensible and followed. USDA's APEC report released this week shows that there is significant room for improvement in program accuracy and includes a wealth of information that can be used to develop

measures to improve program integrity by building on the efforts of the many school districts and states that have already achieved high accuracy.

When developing program integrity proposals, we urge Congress and USDA to carefully tailor interventions to specific problems and assess whether a proposed measure meets key criteria:

- Does it have a demonstrated impact on reducing error?
- Will it maintain program access for the most vulnerable children?
- Is it feasible?
- Is it cost-effective relative?

Proposals that meet these criteria can be pursued without exacerbating food insecurity for low-income school children or overly burdening schools. Proposals that focus on expanded use of data from other programs and sources are especially promising, as are measures that take advantage of more widespread use of technology by school systems in recent years. To ensure that low-income children receive the benefits for which they qualify, it is important to address errors that result in underpayments as well as overpayments.

Brian Riendeau, Executive Director
Dare to Care Food Bank

Testimony before the Senate Agriculture Committee
To review Child Nutrition Programs
May 7, 2015

Dear Chairman Roberts, Ranking Member Stabenow and members of the committee:

Thank you for inviting me here today. My name is Brian Riendeau and I am the Executive Director of Dare to Care Food Bank in Louisville, Kentucky. I am honored to represent Feeding America's network of food banks and agencies that, like colleagues here today, work daily to address child hunger in our country. Dare to Care Food Bank is one of 200 food banks in Feeding America's network that helps combat hunger and food insecurity across the United States. Together, we serve more than 46 million people in need, including 12 million children, through 58,000 food programs including food pantries, soup kitchens, shelters, afterschool and summer feeding sites for children, and other programs.[1] Dare to Care Food Bank serves more than 300 agencies across a service covering 13 counties in North Central Kentucky and Southern Indiana. Our service area spans nearly 4,000 square miles and includes urban, suburban and rural areas.

My remarks today will address the critical role federal summer and afterschool feeding programs play in addressing child hunger throughout the year. While I will focus on these two federal programs, I in no way intend to diminish the importance of meal programs that serve children in child care and during school, or pregnant women, infants and toddlers served through the WIC program. I will discuss the role Dare to Care Food Bank and other food banks play in addressing child hunger in communities through innovative public-private partnerships. From our experience operating summer and afterschool programs for more than a decade, as well as experiences of partner food banks across the country, I will address challenges and barriers we face in reaching more children and offer policy solutions that will help communities ensure more children have the nutrition they need throughout the year when they are out of school.

It is important to note that 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. Incremental change is not enough and an investment in funding child nutrition programs is an investment in our children's health and education and a productive competitive future workforce that will pay dividends in years to come.

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[1] Feeding America, *Hunger in America 2014*, National Report. August 2014.

Background

Though not always visible, child 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 reduce their own portion sizes or skip meals to protect children from actual hunger pangs. In fact, a recent Feeding America study found that as families in my home state of Kentucky struggle to make ends meet, 88 percent of households that access charitable food programs report purchasing inexpensive, unhealthy food to make ends meet.[2]

The number of children living in food insecure households rose 33 percent in the first year of the recession and has hardly abated since.[3] Over one in five children in America (21.4 percent) now lives in a household that struggles to put food on the table.[4] In Kentucky and Indiana, it is estimated that more than 500,000 children live in households facing food insecurity, uncertain where their next meal will come from. In the 13 counties served by our food bank, 19.6 percent of children are estimated to be food insecure – that's more than 57,000 children.[5]

As shown in Feeding America's annual *Map the Meal Gap* study and as we witness in our daily work, child food insecurity exists in every county in the nation but can look different from one community to the next. Child hunger is particularly pervasive in rural areas. Across the United States, 62 percent of the counties with the highest child food insecurity rates are rural, even though rural counties comprise only 43 percent of all U.S. counties.[6] Although many rural areas may experience child hunger at a higher rate, urban areas can be home to larger numbers of hungry children and may face challenges addressing the sheer number of children in need of assistance.[7] For Dare to Care Food Bank, Jefferson County alone – which includes Louisville, Kentucky – accounts for nearly 60 percent of the estimated 57,500 food insecure children across our 13 county service area.

Regardless of where families live, we know that food insecurity is particularly detrimental for children. They are more vulnerable to the harmful effects of food insecurity and the long-term consequences can be more severe. Poor nutrition and episodes of hunger subject children to increased health risks and impaired cognitive development. These challenges are even more difficult during the summer months when low-income children do not have access to school meals. In the summer months, research shows that hunger for families with school age children increases by 34.2 percent and that most children – particularly children at high risk of obesity – gain weight more rapidly.[8]

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[2] Feeding America, *Hunger in America 2014*, National Report. August 2014.
[3] Household Food Security in the United States, 2013. U.S. Department of Agriculture, Economic Research Service, September 2014, Table 1B. http://www.ers.usda.gov/publications/err-economic-research-report/err173.aspx#.VCDiqBakveg
[4] Ibid.
[5] Gundersen, C., A. Satoh, A. Dewey, M. Kato & E. Engelhard. *Map the Meal Gap 2015: Food Insecurity and Child Food Insecurity Estimates at the County Level.* Feeding America, 2015. http://www.feedingamerica.org/mapthegap
[6] Ibid. Table 11.
[7] Ibid.
[8] Von Hippel, P.T., B. Powell, D.B. Downey, and n. Rowland. 2007 The effect of school on overweight in childhood: Gains in children's body mass index during the school year and during the summer vacation. *American Journal of Public Health* 97 (4): 796-802.

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 have been successful in reducing the hunger and extreme malnutrition that we saw in the United States several decades ago.

Forty years ago this year, Congress authorized a nationwide summer meals program to ensure children do not go hungry during the summer months when school meals are no longer available. Today the Summer Food Service Program is providing more than 160 million meals to children in need, preventing child hunger for many during the summer months.[9]

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

In recent years, anti-hunger advocates, schools, community based groups, health professionals, and other stakeholders have built strong partnerships with the USDA and private funders to strengthen participation in the Summer Feeding Service Program by encouraging more community organizations to sponsor summer feeding sites and by increasing awareness of the program to boost enrollment at current sites. Since 2007, the number of sites offering summer feeding has grown by more than 30 percent.[10]

This year, Kentucky was fortunate to be selected as a USDA target state. This year we are working with our partners, the Kentucky Department of Education, and regional office to coordinate summer programs and meet our goal of serving 1,760 more meals. Since 2013, 16 states have received technical assistance through these efforts from the department and national charitable partners to increase the number of sites and children reached during the summer months.

However, the summer gap remains considerable despite the significant investments made over the history of the program. For example, our neighbors in Arkansas received support for 2013 through the USDA technical assistance and experienced the largest growth in the country, more than doubling participation to 41,946 children reached.[11] However, while nearly all communities are eligible to operate an open summer feeding site, only 23 percent of children that received free or reduced priced school lunch received a summer meal last year. In 21 states, less than 15 percent of low-income children that received a school lunch accessed a summer meal in 2014.

Kentucky, Indiana, and Arkansas are not the only states that have faced significant barriers to reaching children during the summer months. Nationwide, less than 4 million children received food assistance through a summer feeding program last year. That is only about 18 percent of the kids that rely on free or reduced-price school lunches during the school year.

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[9] Summer Food Service Program Data, U.S. Department of Agriculture, Food and Nutrition Service. http://www.fns.usda.gov/sites/default/files/pd/03sfsmeals.pdf.

[10] Summer Food Service Program Data, U.S. Department of Agriculture, Food and Nutrition Service. http://www.fns.usda.gov/sites/default/files/pd/sfsummar.pdf.

[11] Summer Food Service Program Data, U.S. Department of Agriculture, Food and Nutrition Service. http://www.fns.usda.gov/sites/default/files/pd/04sffypart.pdf.

In fact, summer feeding provides the most striking access gap among the federal nutrition programs. While some families have access to summer feeding sites in their communities, the majority do not. The current summer feeding model requires children to consume meals at a designated feeding site. For reasons discussed below, it can be difficult to operate a site-based model during the summer, so there are far fewer access points during the summer than during the school year.

Our nation could do much more to reduce child hunger and malnutrition simply by reaching more children during the times when they are not in school. The reauthorization of child nutrition programs in 2015 provides the important opportunity to make good programs even better though policy updates that will improve access to quality child nutrition programs and ensure no child goes hungry.

Summer and Afterschool Program Success

The Dare to Care Food Bank and the broader Feeding America network has a long standing commitment to serving food insecure children when they are out of school – after school, on weekends and holidays, and during the summer. Across the country, an increasing number of food banks operate afterschool and summer congregate feeding programs, and many are also expanding their operations. In 2014, 79 food banks operated afterschool programs through CACFP and 100 offered summer programs through SFSP, a 27 and 33 percent increase respectively since 2011. During that time, meals provided through afterschool programs increased by 84 percent to 11.7 million meals while summer meals served increased by 63 percent to 5.7 million meals.

The Dare to Care Food Bank, and our colleagues across the country, could not do the important work of combatting child hunger without the federal Summer Food Service Program and the Child and Adult Care Food Program. We see both of these programs as two of the strongest public-nonprofit partnerships in the fight to end hunger in America. The programs leverage the commitment, resources, and local expertise of community providers and educators. Sponsors and sites that operate summer and afterschool feeding programs raise awareness within the community, deliver and distribute food, usually daily, and also run enrichment activities. While the federal government provides meal reimbursement for every qualifying meal or snack provided to eligible children, the program would not be feasible without the huge commitment made by our communities. Without the reliability of funding that SFSP and CACFP provides, we would not be able to hire staff or make commitments to sites that serve low-income communities.

Summer and afterschool feeding sites are made possible by strong collaborations on the ground. Summer camps, schools, Boys and Girls clubs, Parks and Recreation centers, YMCAs, United Way organizations, food banks, and other community and faith-based organizations work together to ensure sites are available in high-need areas and that low-income families know that the program exists and where to find a site. We work with our schools, local businesses, volunteers, and state and federal agencies who are all passionate about ensuring kids have the nutrition they need to learn, grow, and thrive. In the Feeding America network alone, food banks served more than 5.7 million SFSP meals at more than 3,200 sites across the country in 2014.

At the Dare to Care Food Bank, during the school year we serve as a sponsor through CACFP and provide food to 24 afterschool program sites in 3 counties and reach over 1,000 children a day. We started working with afterschool meal programs in 1993 at a site we still work with today. We primarily serve Jefferson County, which includes the city of Louisville, and nearby areas in surrounding counties. During the

summer, Dare to Care Food Bank serves as a summer feeding sponsor and this coming summer of 2015 we will provides meals to 24 sites across 3 counties in our service area. Most of our afterschool program sites continue through the summer.

Our meals are offered in YMCA's, Boys and Girls Clubs and community centers in impoverished areas. Children who visit our partner sites will not only receive a nutritious, warm meal, but they will have a safe alternative to being on the streets, they can access mentors, tutoring, athletic programs and just be kids and hang out with their friends. Many of the children walk to these sites and spend most of their out of school time at these locations.

In addition to the congregate programs that are reimbursed through CACFP and SFSP, Dare to Care Food Bank has secured private funding to serve the gaps when children are not in school. In some areas, we operate mobile or stationary school pantries to meet the needs of food insecure children and their families. However, the largest of our privately-funded efforts is our backpack program which is designed to reach kids during the weekend or summer when they cannot access a feeding site. Backpack programs are operated throughout the country and originated with a school nurse in Arkansas. When children ended up in the nurse's office on Monday mornings complaining of stomachaches and dizziness, she realized that the children had had little to eat since their school lunch on Friday. The school partnered with a local food bank to provide backpacks with child-friendly groceries that children could take home with them to ensure they had enough to eat over the weekend.

The backpack program follows a similar model at Dare to Care Food Bank and across the country. At the end of school on Friday afternoon, children are provided a backpack filled with nutritious foods in child-friendly packaging to ensure they have enough food to eat over the weekend. We pack backpacks and deliver them to schools. Schools in turn distribute the backpacks to children in need of food assistance. Dare to Care Food Bank started the program in 2004 with 4 locations and we now provide backpacks in 38 schools across 11 counties serving nearly 2,100 students in primarily rural communities where afterschool feeding programs are not as readily available. We have focused on our rural communities because we know there are fewer services and supports to meet the needs of these hungry children. Nationally in the Feeding America network in fiscal year 2014, 159 food banks operated backpack programs at over 11,500 sites, serving nearly 44 million meals to 457,000 children. Within the Feeding America network, backpack programs are the largest child nutrition program.

Summer and Afterschool Program Challenges and Barriers

In the more than ten years Dare to Care Food Bank has operated the federal afterschool and summer child nutrition programs, we have learned where and how the afterschool and summer programs work best. We, like food banks around the country, have also faced barriers that prevent us from expanding our program to meet all children who are in need of nutrition assistance. Some of these barriers include insufficient or inconsistent transportation to get children to existing sites, lack of community infrastructure and resources to establish sites, and weather and safety concerns.

In Jefferson County, the school district is an important partner and operates summer and afterschool programs to reach those in need. We therefore work with other partners to provide food to summer camps, church groups, and city recreational centers where low-income children are already congregating.

We often provide prizes or other incentives to encourage children to visit the feeding site. However, in the more suburban and rural areas, there are significant challenges to operating summer feeding sites. Most schools do not operate a summer feeding program and even those who do report low participation rates because children are not able to travel to the site each day to participate.

Often a parent or other adult may not be available to take a child to and from a site. Does a parent feel safe letting their child walk to a local summer feeding site? Are there major roads or unsafe sidewalks that prevent a young child for attending a site that is only a short walk away? How can we support children in areas of high crime of gun violence who are fearful about walking to a park to get a summer meal? In the summer months, weather can also be a concern. Our fellow sponsors across the country often experience extreme heat, thunderstorms, or tornados as barriers to children attending site-based programs. In many communities, our food banks are unable to find a suitable location to host a summer feeding site. Some towns do not have a public library, recreation center, or Boys and Girls Club that is close enough to be utilized by the population in need.

Innovation and Policy Solutions

There are several policy changes Congress could make that would help Dare to Care Food Bank, and thousands of other charities and community-based organizations across the country reach more children during the summer and after school. 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 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 in communities 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.

Dare to Care Food Bank aims to reach children facing hunger – no matter the time of year. That is why we support afterschool programs with nutritious balanced meals and snacks during the school year and serve those same institutions during the summer months. However, as sponsors of these sites, the food bank must work with two separate federal programs – the Child and Adult Care Food Program during the school year and the Summer Food Service Program during the summer, even though we are serving the same 24 sites, and often the same kids.

The two programs – CACFP and SFSP – are similar but have inconsistent program requirements that can cause confusion for staff and volunteers operating the program. What's more, the administrative requirements are often duplicative. Our food bank staff have to apply twice to the state agency –once for afterschool and again in the summer – and also have to conduct training and monitoring, often for the same staff and same sites back-to-back. Our training for the summer food program occurs at the start of summer, and then we turn around and train the same staff again before October for the afterschool program.

Our food bank serves counties in Kentucky and Indiana and therefore we have to work with two different state agencies – and four different contacts – to operate programs year-round. In a handful of states, CACFP and SFSP are administered by different state agencies, further increasing inefficiency and duplication.

Community-based organizations that operate federal nutrition programs that reach kids while they are out of school, like our food bank, and local YMCAs, Boys & Girls clubs, parks and recreation departments, or other charities, should have the ability to operate one program. This will allow them to focus on feeding hungry kids, not pushing paperwork. While schools have the ability to operate after school and summer feeding sites year round through one program, the National School Lunch Program (NSLP), community based organizations must operate separate programs. While we know the streamlining of the two programs will assist our food bank to operate the sites more efficiently, we also know it will enable some of our partners who haven't participated in both programs because of the paperwork burden to begin sponsoring and operating sites for children in their community.

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). 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 up new access points for underserved families.

Allow Alternate Program Models

A second recommendation to reduce the summer meal gap is to permit community organizations, such as the Dare to Care 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 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.

Dare to Care Food Bank, like community-organizations across the country, has sought private funding to try alternative models to reach kids while they are out of school. Our backpack program implemented in the rural communities of our service areas was designed to meet this very need. Some of our sister food banks, such Second Harvest Food Bank of Northeast Tennessee, have implemented mobile summer feeding programs to bring food to children with high need in hard to reach areas. In Tennessee, the food bank purchased four retired school buses, and each day in the summer they travel to communities that don't have traditional summer feeding locations, park the bus, and bring kids on board to eat a nutritious meal. Across the country we have seen the positive impacts of these alternate models – whether a mobile

bus or backpack program. However, they require huge investments from our community. When they are employed using private funds, they are often unsustainable and cannot meet the full need within the community. At our sister food bank in Eastern Michigan, to meet the needs of kids at some of their rural sites where they knew kids were not able to participate every day of the week, the food bank sent kids home with a box of nutritious food for those days they were unable to attend the site. However, the program depends on private funds and the food bank has not been able to operate the program every year and is uncertain about the future sustainability given a lack of consistent funding.

Dare to Care Food Bank would not be able to serve over 77,000 meals each summer without the reimbursements we receive from the Summer Food Service Program. While we have considered alternate models to reach kids in rural areas, without federal reimbursement to offset costs, we cannot implement a sustainable model. A mobile program – bringing food closer to kids rather than requiring them to travel, often more than 10 miles, to participate in a summer feeding site – offers the potential to reach children who are simply not able to access a site. However, our rural communities in need are small and far apart and at this point, we have determined a mobile model is cost prohibitive. The time and costs associated with the travel and the time associated with the requirement that kids eat a full meal before we move on to the next location would limit the number of children and meals we could serve. In most of our rural communities, there is not a summer feeding program – privately funded, or through the Summer Food Service Program – because of private funding constraints and limitations within the federal program. As a result, fewer than 10 percent of the children in Kentucky who are receiving free or reduced price lunch during the school year are accessing summer meals.

Community-based providers need more options in SFSP to meet the unique needs of our communities. While our challenges are mostly related to transportation concerns in rural areas, we know that our colleagues in urban and suburban communities face similar challenges.

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 waiving 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 Dare to Care Food Bank can utilize all of our resources to reach those in need.

At Dare to Care 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. The EBT Summer Demonstration projects that have been in effect for five consecutive summers provided families with a grocery card pre-loaded with $60 per month per child certified for free or reduced-price school meals. States administered the program through the EBT systems in either the Supplemental Nutrition Assistance Program (SNAP) or the WIC program. The demonstration projects were extensively evaluated and in both rural and urban counties with 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 consumed 12.6% more fruits and vegetables, 29.6% more whole grains, 9.7% more dairy, and 7.5% fewer

sugar-sweetened beverages.[12] What's more, 50-98 percent of families in the demonstration area used the benefit, which is significantly larger than the nearly 18 percent of children that utilize the current congregate summer meal program.

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 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.

Conclusion

Child hunger is a solvable problem in our community. Dare to Care Food Bank and our colleagues and neighbors are dedicated to this fight and will continue to work together – with government and private stakeholders – to support the needs of our children in Kentucky and Indiana. We urge Congress to invest new resources to increase access to child nutrition programs serving children outside of school, supporting the child nutrition programs that help us to do this important work.

By both strengthening the site-based model as well as providing alternate models for communities where the site-based model is not practical, Congress can help ensure children have the nutrition they need throughout the year to thrive. Through reauthorization of child nutrition programs, Congress should allow community providers to operate one child nutrition program year round through SFSP and reduce the area eligibility requirement for sites from 50 to 40 percent. Congress should also allow alternate program models such as allowing children to consume meals off-site or giving families a summer grocery card. We believe that with more program options – when working together in a targeted, complementary way – we can close the summer meal gap. We call on Congress to reauthorize summer and afterschool feeding programs in a way that marries strong national program standards that ensure program integrity, nutrition quality, and food safety, with the flexibility that communities need to reach all children facing hunger.

On behalf of the Dare to Care Food Bank, Feeding America, our partner agencies and the people we serve, I thank you for your time and attention. I encourage you to strengthen child nutrition programs in reauthorization to help us end hunger in this country. And if you have not already, I encourage to visit your local food bank to see first-hand the great work they do. Thank you.

Sincerely,

Brian Riendeau
Executive Director
Dare to Care Food Bank

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[12] U.S. Department of Agriculture, Food and Nutrition Service. Report on the Summer Food for Children Demonstration Projects for Fiscal Year 2013, December 2013.

QUESTIONS AND ANSWERS

MAY 7, 2015

Senate Committee on Agriculture, Nutrition & Forestry
A Review of Child Nutrition Programs
May 7, 2015
Questions for the Record
Mr. Richard Goff

Senator Stabenow

1. Your state has embraced technology as a means to improve accuracy in your meal programs, but also to reduce some of the administrative burdens on schools and families. What was the upfront cost associated with building a comprehensive, linked point of sale and eligibility system throughout the state? Some schools have raised concern about debt from unpaid student meal accounts. How has this system helped to address that concern? Can you describe how your point of sale system helps improve accuracy for counting and claiming?

The upfront cost was a little under 2.0 million dollars for the entire state. The funding was provided by all of the sponsors pooling their state aid matching funds to allow our state agency to competitively bid, award and secure the system. Our statewide system created statewide eligibility. When students transfer from district to district within our state, an image of their application or other eligibility determination transfers with them. This eliminates the need to reapply for meal benefits at the receiving school system, thereby eliminating any debt that may have been incurred while waiting to be approved in the new school district. We have in essence created a statewide eligibility. Most often, an eligible child incurs lunch debt while waiting for meal application approval from the receiving school. With our system, if the child qualified for free meals when they move, they still qualify on the first day of school in the new area. There is no interruption of meal benefits and no need to charge the child for a meal that we know their parents aren't accustomed to paying for. Uncollected debts were reduced by this approach.

The counting and claiming of our statewide system is completed electronically through our computerized system. All schools utilize the same system, thereby making it easier to consolidate meal counts and create a district wide claim for reimbursement. The system uses a coded student I.D. number unique to each child and their individually approved meal eligibility. It electronically captures and categorizes each meal for proper federal reimbursement. Several different methods are used to log meal counts. Key pad entry, bar

code scanning, I.D. card readers and biometric scanning are examples of several of the most popular input methods. The system has edit checks and audit functions built into the software. The computerized system prevents duplicate claiming for one child, over claims by category, red flags for attendance adjustable eligible meal count claiming, easily recognition of claiming patterns, and parent billing features. The system handles visiting student and adult visitors. Daily and Monthly reports are reconciled electronically to ensure accuracy and accountability. Moreover, the statewide system interfaces with each county school district's accounting system to monitor the expenditure side of the program as well. Meal counts are transferred to the state agency and claimed through a different state level system to ensure that the state wide counting and claiming is accurate with the state agency consolidating and claiming software.

2. **States play a major role in school meal operations as well. Your state took a leadership role in trying to help your schools succeed with the "Feed to Achieve" legislation, even going so far as putting state resources behind school meal improvements like scratch cooking training, equipment and technology and early adoption of meal standards and Community Eligibility. Why did West Virginia believe it was important to invest in school meals?**

Most of the advancements and successes that we have seen in WV are the result of State Aid funding required to match the federal funds appropriated throughout our state and not the result of additional state funding from our legislature. "Feed to Achieve" passed our legislature without a fiscal note and builds upon the funding and programs already in place. In my opinion, many state agencies should examine the method in which they distribute require state matching funds to child nutrition program sponsors. WV believes in the holistic approach to educating a child. Children are confronted with a host of issues when the reach the school doors. They arrive with all sorts of baggage and schools are expected to teach them, when in actuality they are not ready to start the day. Childhood hunger, obesity, no health care, domestic violence, lack of parental support, illegal drug use and dealings in their communities and many other factors play a role in creating a child that is not ready to learn. Most of these issues external to school are beyond our control but WV decided that it could do a much better job of getting the child settled in the morning and providing a nourishing breakfast to start their day. WV realigned school breakfast with the instructional day to ensure that the meal service does not compete with the startup of school. Breakfast participation rates have skyrocketed and we have seen an improvement in test scores,

alertness, attendance, reduced behavioral problem, reduced tardiness and fewer trips to the school nurse

Senator Bennet

1. Over the last few years, Colorado has experienced increases in access to critical nutrition programs. Our state has a new law that provides breakfast after the bell to all kids in high poverty schools. But breakfast participation across the country is still barely a half of lunch. Often logistical barriers undermine the success of the program. Outside of school, kids, especially in rural communities, face challenges in receiving consistent, reliable, and continuous access to healthy meals. We have a mix of programs and a wide range of providers and sponsors from schools themselves to the Boys and Girls Clubs, parks and food banks. The process and options vary across communities and can be confusing to families. In rural Colorado, the only summer option may be an hour away; that is just too far to travel to eat lunch.
   As we work on reauthorization, it's important we not lose the perspective of a kid -- who is hungry and just trying to get a good meal. Kids in poverty face tremendous barriers and challenges. Some we can help fix, others are much harder. But, being hungry shouldn't be one of them.

   What is the kid's experience in all of this? How can we make it easier for kids from low-income families to have access to healthy meals no matter the time of day or the month of the year? And, if we only do one thing in this reauthorization, what should it be?

   In my opinion, it is difficult to name only one thing that can be done to improve access to nutritious meals for low-income families when so many options exist. This reauthorization could focus on reducing some of the restrictions that prohibit sponsors from expanding their reach.
   - Permitting after school supper meal reimbursements under the National School Lunch Program to ease the administrative burden that requires schools to sponsor the Child and Adult Care Food Program to serve a more substantial meal such as a supper.
   - Ease some of the congregate feeding restrictions under the Summer Food Service Program and institute a mechanism or funding stream to address transportation costs for rural communities.

- Make it easier for school to qualify for the Community Eligibility Provision to address the hunger that exists among our working poor, those families that do not qualify for free meals yet struggle to make ends meet and live pay check to pay check especially during a down economy.
- Help State Agencies find solutions by permitting them to maintain earned administrative funding that is limited to a 20% carry over limit. States can often think outside the box and find solutions only to be limited by funding that they have earned and later have to return because of a limited carryover amount. A 30% carryover limit would allow states the ability to plan, budget and find innovative ways of reaching children by granting them a larger budgets to carry into the new year. The 20% carry over limit sometimes promotes inefficiency and needless spending because some states spend year end funding hastily in an effort to not lose funding rather than being able to plan for more substantive projects in the new year. Additionally, the State Administrative Expense (SAE) funding formula that provides administrative funding to State Agencies needs to be revisited. Missed school days due to snow, flooding, water contamination, and other unexpected occurrences plagued WV recently and manifested themselves by reducing the amount of SAE funding allocated to our state since the SAE funding is formula driven based on meal participation. When school is not in session, children can't participate in the meals programs and our funding is negatively impacted. However, our state administrative responsibilities remain the same.

2. Over the law few years, my home state of Colorado has made progress and seen increases in access to critical programs like school breakfast. But kids in Colorado still face significant challenges during the summer months. In Colorado, more than 350,000 kids are eligible for free and reduced price lunch in school. Yet, during the summer, only 19,000 on average participate in the summer meals program. What do the other 300,000 kids do during the summer? Do they simply skip lunch?
   Kids in rural communities face the biggest challenges in accessing meals during the summer. They may not have transportation to a summer site or the site is just too far away. How can we fix this? What changes to the summer meals program would make it easier for kids, particularly those in rural communities, to participate?

Ease some of the congregate feeding restrictions under the Summer Food Service Program and institute a mechanism or funding stream to address transportation costs for rural communities. During the summer months, meals could be able to be delivered to low income communities. We cannot simultaneously be concerned about reducing childhood hunger during the summer months while agonizing over whether someone other than an eligible participant may have taken an apple from the USDA subsidized meal. Who knows, the child may even save part of the meal for later that evening. Hunger is a terrible thing that some people must plan for. I know that these programs are aimed at children and abuse can occur, but sometimes we get too focused on a rule that while trying to protect the integrity of the program, it ends up not being cost beneficial.

3. **Across the country, many fewer students participate in school breakfast programs than in school lunch program. On the average day, just half the number of kids who eat lunch also eat breakfast. How can we support and encourage creative and innovative approaches to breakfast in order to reach more kids?**

All public schools in WV are required to offer a USDA sponsored breakfast program. Every child needs nutritious meals in order to achieve his or her potential. West Virginia realigned breakfast with the instructional day, giving every student the opportunity to eat a school breakfast. With this requirement, West Virginia recognized the connection between student health and academic success. WV requires all public schools to implement innovative breakfast delivery strategies and lunch options that provide students with a minimum of two nutritious meals per day and, where feasible, at no cost to the student. ***The state agency approved breakfast strategies must be instituted in a manner that prohibits the breakfast program and student accessibility from competing with the start of the school day.*** In WV, as in most states, breakfast was typically offered at the worst possible time of the day; at the beginning of school. Students are arriving, buses were late, the tardy bell was ringing and most kids wanted to talk to their friends. Breakfast was set up to fail. In our state, we were not even meeting the needs of our hungriest students. Our state is comprised of approximately 60% needy students, those children that qualify for free or reduced price meals. Prior to community eligibility and the WV Feed to Achieve Act, we were serving only 29% of our enrolled children a breakfast on a regular basis. To be successful and meet the needs of the students, breakfast must be *readily accessible by the students.* Implementation of these innovative breakfast delivery strategies began in fiscal year 2013,

with full implementation required in all schools at the start of the 2015 school year. Innovative breakfast delivery strategies include, but are not limited to: Grab-N-Go Breakfast, Breakfast in the Classroom, Breakfast After First, or a combination of the three.

Senator Brown

1. This is one of the most important issues this committee deals with and I hope we can continue to do so in a bipartisan way.
   Mr. Goff, thank you for testimony. Your enthusiasm and your state's dedication to investing in its children is to be admired. In your testimony you said that as schools in your state began implementing healthier meals, that "school administrators were no longer balancing their school budgets on the backs of our children's health." This is a great reminder for the Congress that while we all want well-managed, economically sound programs, the goal of the National School Lunch Program is to ensure that children are not going hungry and that they receive the nutritious foods they need to thrive in school. Can you tell us how you were able to get buy-in from all of your schools to implement these new standards? Would you see the 2010 bill has been a success for the schools and children of West Virginia?

Initially, many school food service personnel, students and parents balked at the new nutritional changes. Additionally, school administrators, staff and fundraising groups did not approve or support the new guidelines. Lunch participation rates initially dropped and complaints were a common occurrence. The WV Office of Child Nutrition developed a comprehensive implementation plan for the new policy. The plan focused on the education of school administrators, school nutrition workers and school staff. The media, workshops, guidance memos and a parent website assisted in explaining the need for the nutritional standards changes and help garner support for the new initiatives. A "From-Scratch" statewide training was provided to the cook staff as a means to reduce the serving of processed, heat-n-serve items high in saturated fat and sodium. As the acceptance of the changes in the school meals menus and competitive food rules improved, meal participation rates started to rebound and improve. By the time the Healthy, Hunger-Free Kids Act of 2010 passed, WV was starting to make miraculous improvements in their school meals. Fresh fruits and vegetable salad bars were becoming more and more popular. Skim and low fat milk were no longer a topic of discussion and students were now asking for more of the

"brown bread". Soft drink and unhealthy vending machines no longer cluttered our school hallways. Unhealthy fundraising programs like the "cookie dough" and "candy bar" sales were now a thing of the past.

Breakfast in the Classroom was originally a point of contention among the classroom teachers. Many did not want food in their classrooms and often complained about lost instructional time and trash. The West Virginia Department of Education supported this initiative by recognizing this time as part of the instructional day as long as teachers were getting the students settled, taking roll and going over the prior day's assignments. Teachers began to see students that were more alert, attentive and focused on the classroom instruction. The benefits of a simple school breakfast began to make an impression on the teaching staff and they began to realize that "we are all climbing the same mountain".

The 2010 Healthy, Hunger-Free Kids Act has been a huge success for the schools and children in WV. The provisions of the bill have helped support our already progressive nutrition standards and provide our state with Community Eligibility that is being utilized in 54% of all our schools statewide. This has helped increase meal participation and created added financial relief for those families not typically eligible for free meals but considered to be the "working poor". The school environment and fundraising activities are now healthier as well.

2. **We often hear about summer learning loss overwhelmingly impacting low-income children. Does that also translate to poorer health outcomes for low-income children who might not be receiving meals during the summer or do not have access to a summer feeding site?**

I am not familiar with the statistic on summer learning loss and the impact on low-income children. I do know that low-income children are more at risk for proper nutrition during the summer months when school breakfast and lunch is not available. Therefore, I would assume that poorer health outcomes related to nutrition are impacting these children as a result.

Senator Casey

1. You currently work with CACFP and also had experience with it in a previous work position. I plan to introduce legislation to strengthen the program. Can you talk about CACFP in your state and how would you improve the program nationally?

In West Virginia, the major improvements to the Child and Adult Care Food Program (CACFP) have been two-fold:

Automating the CACFP. Fifteen years ago, all documentations related to the CACFP in West Virginia was on paper. The sponsor and site applications as well as the monthly claim for reimbursement were mailed to the office, manual edit checks were performed and everything was processed by hand. This system was inefficient for both sponsors and West Virginia Department of Education (WVDE) Office of Child Nutrition (OCN) staff. Consequently, the OCN worked to procure an online application and claiming system. This electronic system became the foundation used in the on-line administration for all federal programs in West Virginia.

Improving nutrition standards for CACFP. West Virginia has long been a national leader in the area of nutrition standards in the National School Lunch Program (NSLP). West Virginia's *Standards for School Nutrition*, Policy 4321.1 was formally adopted in 2008 and included the Institute of Medicine's recommendations for all foods served, sold or distributed in schools. For children attending school in West Virginia, these standards constituted a significant shift. As the implementation of Policy 4321.1 progressed, it became obvious that the school standards did not reach our most vulnerable population: children aged 0-4 years old. The WVDE OCN believed, if there was going to be a significant change in the eating behaviors of West Virginia's children, it is important to start working with them as early as possible.

From this idea, the "Leap of Taste" nutrition standards were developed and implemented for all CACFP sponsors in West Virginia. The development of the "Leap of Taste" standards would not have been possible without the generosity from Nemours Health & Prevention Services and the Delaware Department of Education; both organizations provided West Virginia with the framework and foundation necessary to implement West Virginia's "Leap of Taste."

The "Leap of Taste" standards increase the fresh fruits and vegetables offered to children, lower the milk fat content required, and reduce the amount of processed foods that centers may serve. The focus is on the food groups in the CACFP meal pattern which include: Milk, Grains/Breads, Fruit/Vegetable and Meat/Meat Alternates. The goal is to provide healthy guidelines for the food groups, portions sizes that are based on CACFP reimbursable meal pattern, and sample policies that centers can use to work with families.
For more specific information on West Virginia's "Leap of Taste" nutrition standards, please visit the WVDE OCN website: **http://wvde.state.wv.us/child-nutrition/leap-of-taste/**
While technically the standards were written for CACFP sponsors, the West Virginia Department of Health and Human Resources (WVDHHR) included WVDE OCN nutrition standards in the state law for all licensed child care facilities. Therefore, all centers, whether or not they participate on the CACFP, are required to adhere to the "Leap of Taste" nutrition standards.

After the initial "Leap of Taste" training, child care center directors and cooks were offered culinary training to develop menus and prepare recipes from scratch. In 2011, the OCN partnered with Pierpont Culinary Academy and Chef Brian Floyd to help with the second phase of this process and offer the "Leap of Taste" Culinary School. During these 4 days of training, our centers were able to experience and participate in the following:

- Cycle menu planning;
- Culinary presentation;
- Culinary laboratory (worked with Chef Brian Floyd to prepare menu items in full scale kitchen);
- Sampling recipes (menu items and recipes were discussed to determine how they could be improved and how it would work best for demographics and center size); and
- Evaluation.

In 2012, the WV "Leap of Taste" Nutrition Standards Outreach Tool Kit was developed to get child care staff, parents and communities more involved in serving their children nutrition meals. This toolkit is intended to serve as a practical "how to" guide to follow the nutrition standards. Materials include:

- West Virginia "Leap of Taste" Nutrition Standards;
- Recommendations regarding physical activity and screen time;
- A self-assessment to how centers or homes strengths comply with Standards and identify areas needing improvement;
- 16 weeks of WV CACFP/Leap of Taste approved reimbursable menus;
- Shopping lists and budget-saving shopping tips;
- Ideas for engaging children, staff, parents and your community;
- Age-appropriate physical activity in lesson plans;
- Tips and tools for nutrition labels, motivation picky eaters, storing food safely and modeling healthy habits; and
- Lists of books, websites and local resources.

Also in 2012, the OCN was able to obtain a grant from Team Nutrition to work with 25 centers for two years. This project allowed these 25 centers to start their own containers gardens. Centers were provided training by West Virginia University Extension Agents as well reimbursement for items needed to get their gardens started. The goal of this project was help CACFP centers incorporate more fresh produce into their menus while providing children the educational opportunity to learn where their food comes from.

As part of this Team Nutrition grant, the OCN also contracted with Chef Dale Hawkins from Fish Hawk Acres. Chef Hawkins presented several sessions to centers on how incorporate fresh items into the menus and recipes. Many of these centers have continued their container gardens and some even have larger gardens at their centers.

In 2014, Dr. Jamie Jeffrey, a locally renown pediatrician, whose organization *KEYS 4 HealthyKids* is active in the fight against childhood obesity in West Virginia, asked the OCN to collaborate in the development of a Farm to Child Care program. Dr. Jeffrey was aware of West Virginia's CACFP nutrition standards and wanted to make connections between local farmers and child care centers. The OCN has collaborated with *KEYS for HealthyKids* in the development of community supported agriculture (CSA) projects to increase the buying power of local fresh produce for child care centers. This pilot program is still in its infancy stage and continues to grow as the initiative gains more community support.

2. The concern about stigma was raised at the hearing – the idea that only poor children will be eating in the cafeteria while those with greater means will obtain their lunch or breakfast elsewhere – which I think we can all agree is not what we want to happen. We certainly know that community eligibility has been helpful with this, but what about those areas that do not qualify for community eligibility? Could you talk about any practices you have applied in West Virginia to deal with the issue of stigma? And do you see different challenges with stigma depending on the geographic area (rural, suburban) or are they about the same across those populations?

   I believe that stigma is about the same across rural and suburban populations. WV has all but eliminated the overt identification of needy children and the stigma associated with participating in the school meals programs as a free or reduced priced child. Additionally, we have eliminated the stigma that also exists among non-needy children that may have been overtly identified as the result of a past due or unpaid lunch bills by their parents. We use a computerized point of sale system statewide. Our system protects the meal status of each child by utilizing a meal status coded I.D. number that is scanned, keyed or biometrically scanned into our counting and claiming software. The I.D. number properly categorizes the child's meal for accurate federal reimbursement. The system doesn't even allow the computer operator to know any child's eligibility status. Free, reduced-price and paid status is protected on the line and at the point of sale. Additionally, school districts bill parents at the end of the month for their child's accumulated monthly lunch bill. This eliminates the need to collect cash on the line, which will overtly identify children as needy. Free status children would never need to exchange cash for a meal and are identified by the cash collection process. We feel that the payment of the lunch bill is the responsibility of the parents and that the child should be removed from the process. Bills are mailed home and children are not expected to be the debt collectors. The elimination of overt identification and stigma has transformed our cafeterias from a free lunch program to a school nutrition program equal for all.

3. You mentioned the early efforts that West Virginia took to implement the new nutrition standards. How do you view the role of education for healthy foods, both for students and for school administrators, to help with the transition? Do you see more students accepting the changes as they become more used to them?

Nutrition education regarding healthy food choices and the role of nutrition in personal health is a required part of school curricula. Including school administrators, teachers, school support staff and cooks in nutrition education would help them communicate the importance of healthy foods any time food choices are made. Some of the biggest detractors of school meals are adults, not the students. Much misinformation is given regarding nutrition both formally, in the classroom, and informally, in the cafeteria. The Healthier US School Challenge, a program that recognizes schools that go above and beyond the nutrition requirements, now requires nutrition education at every grade level.

West Virginia has seen broad acceptance of whole grain products, skim and 1% milk, and lower sodium meals over the years since our stricter standards were implemented in January 2008. Portion size remains a challenge because portions for items like chicken nuggets are smaller than students typically receive in restaurants and at home. As a nation, we still have work to do outside of the schools to gain full acceptance of our healthy standards.

4. **West Virginia had a solid framework for nutrition standards already in place by the time the Healthy Hunger-Free Kids Act of 2010 was implemented, what advice would you give to school districts that are struggling to implement the changes?**

West Virginia, a small, poor, coal mining state has implemented all of the provisions of the Healthy, Hunger-Free Kids Act. In the beginning, we struggled as well. Many times we were confronted with unanticipated road blocks and challenges. Parents were upset, school administrators were frustrated and our cooks almost seceded from the union. I can honestly say that if West Virginia, a state with limited resources, can achieve success and change the school environment; it is within reach of any state. Passion, determination and a will to provide a healthier future for our children can move mountains. Our standards are predicated on one principal; always put the best interest of the child first and do the right thing. We may educate the most globally intelligent group of children in history, but what have we gained if the average life expectancy is age 50 due to poor health.

5. **We hear from a lot of school districts about the administrative burden on food service administrators. Has West Virginia's switch to an online system helped alleviate some of that**

burden? Are there steps that school districts can take on a local level if there is not a statewide system in place?

Our automated system has definitely reduced the administrative burden that was once placed on food service employees. Application approval, direct certification, verification, purchasing and program monitoring have all been simplified as a result of our statewide system. I feel that uniformity, continuity and integrity at a state agency level are all key to a successful meal service operation. We do not permit a la carte sales. All students get a unitized, fully reimbursed meal when they participate in our programs. We have taken measures to eliminate competition with our meal service operations and the use of a billing system for meal services has helped increase participation and federal funding.

Senator Heitkamp

1. Mr. Goff, I've heard incredible things about the work West Virginia has done on their own to lift school meal standards and help schools serve healthy meals. However, I think it is 100% of schools in West Virginia need some new kitchen equipment—something my bill would help get done. Could you talk about the challenges you all face from lack of school equipment and how procuring more would help meet standards?

The replacement of kitchen equipment is a constant need, as is the funding necessary to pay for it. We have implemented a budget process that addresses this need. Periodically, we will earmark state matching funds for equipment replacement. However, some other need is then postponed or missed. Most kitchen equipment is out dated, worn and insufficient to meet our cook's needs. Adequate equipment in the kitchen can help reduce labor costs and reduce preparation time. As the state director, I am constantly receiving requests for funding necessary for equipment purchases. Most programs operate on a margin to begin with and the unexpected cash outlay associated with unanticipated equipment purchases can easily create a financial hardship for a sponsor. Any federal funding allocated for this purpose would greatly help our programs.

Senator Leahy

1. Farm to School Innovation: I authored a provision in the 2004 Child Nutrition and WIC Reauthorization Act which was expanded in the Healthy Hunger-Free Kids Act of 2010, to

establish the Federal Farm to School program. By connecting schools with local agricultural producers, children have gained healthy eating habits, while learning about the importance of where their food comes from. Meanwhile, farmers in surrounding areas are reaping economic benefits and contributing to the livelihood of their communities.
Senator Cochran and I recently introduced the Farm to School Act of 2015 to increase mandatory funding for the federal Farm to School program to meet the demand for Farm to School efforts throughout the country. This year, West Virginia's Department of Education received a USDA Farm to School support services grant to help establish the local food supply chain and needed infrastructure for getting West Virginia products into schools throughout the state.

a. How have local education agencies in your state have been able to tailor Farm to School programs specifically to meet their needs?

Over the past four years, West Virginia has used a number of methods to grow the Farm to School program and tailor initiatives to meet our specific needs. One of the most important things the West Virginia Department of Education (WVDE) Office of Child Nutrition (OCN) did was to form a collaborative partnership with the West Virginia Department of Agriculture, WVDE Career and Technical Education, West Virginia University (WVU) Cooperative Extension Small Farm Center, as well as area non-profits committed to the Farm to School movement. This partnership became known as the West Virginia Farm to School Community Development Group.

The Group used their extensive experience and expertise to further two main goals: increase the amount of local foods in the West Virginia Schools and "grow" the next generation of farmer. To accomplish the first goal, farmers had to trust that there was a market for their product. Financial incentives were initially used to encourage local School Food Authorities (SFAs) to purchase local foods and build relationships with local farmers. The WVDE OCN Farm to School Coordinator spoke to farming groups around the state and worked with WVU Extension to provide education and information to farmers on the initiative. The WVDE OCN partnered with the WVU Extension Small Farm Center over the past few years to offer a huge Farm to School track for farmers and food service directors at their annual conference. The education and training sessions centered on addressing questions and making connections. With information disseminated statewide, financial incentives in

place, and relationships established, the amount of local foods in West Virginia schools grew exponentially.

The second goal of increasing the number of farmers required more long-range planning. As West Virginia farmers age (the average age of the West Virginia farmer is about 59 years old), there was a very real concern that, if an effort was not made to get students interested in agriculture as a career (i.e. growing food!), there was not going to be a Farm to School program. The WVDE OCN set out to find funds to support students at every age in this endeavor. The OCN granted money to Agricultural Education programs around the state build high tunnels, low tunnels, and anything else school systems needed to support their programs. Student "agri-prenourial" projects were funded so that they could learn what it means to have their own business and be successful. Collaborative relationships were developed in schools between Pro Start Culinary programs and Agricultural Education programs; Ag Ed students grew the food and Pro Start students helped process it to get the food into the cafeteria. To showcase this collaboration, the WVDE OCN sponsored the Junior Cast Iron Cook-Off, offering the best Pro Start programs in the state an opportunity to compete. For younger students, outdoor classrooms of every shape and size are being funded and a Garden Based Learning (GBL) curriculum was written by one of the outstanding funded schools, North Elementary in Morgantown, West Virginia. This summer, the staff at North Elementary is offering a GBL symposium at their school for up to 100 participants with funding provided by the WVDE OCN.

AmeriCorps has also been a big part of the WVDE OCN's Farm to School program. For over two years, the OCN has sponsored 10 AmeriCorps members each year around the state to help county food service directors ensure more local foods get into schools and provide needed education. The members sometimes work in a specific county or are assigned to a region, depending on the need. They have a variety of responsibilities including working with farmers to build capacity, establishing school gardens, providing educational experiences for children, and assisting the food service director in increasing their local food purchases. They are able to tailor the work they do based on their county or region's needs.

The West Virginia Farm to School Community Development Group's goals evolved over the past few years as the needs of the state have changed. Farmers now understand and trust that there is a market for what they grow as long as they grow the "right" products to

meet the needs of county food service personnel. The changes in the federal meal pattern requirements have provided direction in crop decisions. Both farmers and food service directors now need to clearly understand procurement requirements and learn new ways to bid their foods to ensure local farmers are still included. Additionally, SFAs must be able to purchase foods as easily as they do from their larger food vendors. Establishing food hubs, building aggregation centers, and finding innovative transportation solutions are all part of West Virginia's plan to continue to build the capacity of the Farm to School program. The WVDE OCN recently received a USDA Farm to School grant. This funding is being used to establish two food hubs in different parts of the state. These food hubs will work with farmers to provide the much needed infrastructure for aggregation and transportation to SFAs.

b. How the has USDA Farm to School grant you received contributed to the success of implementing healthy nutrition standards in schools throughout the state?

The West Virginia Department of Education (WVDE) Office of Child Nutrition (OCN) has worked hard over the past few years to build relationships and establish trust between farmers and county food service personnel. The issue for West Virginia is that individual farmers cannot meet the increasing demand of our school systems. Therefore, the USDA Farm to School grant recently received by the WVDE OCN is imperative in order to establish food aggregation and distribution systems (commonly known as "food hubs") and help farmers increase production. The Farm to School grant will fund two different "food hubs" to help meet the growing local food demand for West Virginia schools. By getting local foods to our students more efficiently and economically, School Food Authorities (SFAs) will be more likely to incorporate local foods into their menus and garden bars. Local foods are fresher and, therefore, received better by students. West Virginia county food service directors are using local foods to help meet the vegetable sub-group requirement in the new USDA meal pattern. On days when local foods are served and promoted, participation in the National School Lunch Program (NSLP) increases and there is less plate waste.

Senator Tillis

1. North Carolina has a large number of school districts seeking waivers from the whole grain requirement based on USDA's promulgated food standards. There are also reports that students will not eat school food that complies with the wholegrain requirement due to the taste, texture, etc. In addition, food standards mandate that students are required to take fresh fruit and vegetables as part of their meal. Some schools in North Carolina report that students simply throw fruits and vegetables in the trash untouched.

    a. I appreciate that there are minimum standards of nutritional quality that we believe school meals should meet. At the same time, I hope that we can agree that merely offering such meals, when they are not actually consumed, is irresponsible and wasteful. If our ultimate goal is to actually improve nutritional outcomes for the children that participate in a particular school's nutritional offerings, how can we accomplish that goal if students refuse to actually eat the food we offer?

Certainly we all hate to see food wasted. Researchers at Cornell University state that about 30% of the food served in schools is wasted. This occurred before and after the latest standards. There seems to be more focus on food waste in schools since the requirement to take either ½ cup of fruit and/or vegetable. In most cases, I believe schools could help students meet this requirement by allowing them to choose the fruit and/or vegetable they prefer from a self-serve salad bar or hot vegetable bar. The lesson we hope is learned from this requirement is that a meal includes a fruit and/or vegetable. From an adult point of view, this does not seem like an unreasonable lesson, especially considering that most school children have grown up in households where they consume many meals in restaurants where the vegetable is always French fries or nothing at all. There are scientific studies that have shown fruit and vegetable consumption has increased since the HHKA was enacted. In any case, if the ultimate goal is to improve the nutritional quality of school meals, it cannot be done without fruits and vegetables and it probably won't happen overnight but it is the right thing to do.

b. Is it your view that schools should not have *any* flexibility in meeting nutrition standards?

No, I believe that flexibility should exist only in instances when the product is not available and only granted temporarily until the products become accessible. Many times, flexibility or waivers create inequities among districts and states. The saddest reality that I have been confronted with during my career is that everyone does not always do what is in the child's best interest.

c. Should parents and states have more input in determining nutrition standards for school meals?

No. While parents and states should have input, I believe that the development of nutrition standards should be completed by experts in the field such as the Institute of Medicine, United States Department of Agriculture, Dietary Guidelines for Americans and the Academy of Nutrition and Dietetics. This question brings to mind a West Virginia parent and Delegate in our state legislature. She has introduced a bill for three years running to reintroduce junk food into our school systems. The "cupcake bill" made statewide news while the House passed the bill in 2014 and the measure was defeated in the Senate, where several key members are health professional and realized that this would have been a major step backwards for a state that ranks among the top in obesity.

2. North Carolina is one of the leading states in the country with regard to participation in farm to school initiatives. I think the Farm to School program provides a unique opportunity to provide children with nutritious foods and to learn where and how their food is grown while also helping local farmers. I understand that your Department of Education received a USDA Farm to School support services grant this year with a similar goal of doing more to support farm to school in West Virginia. Though it's a federal program, the USDA Farm to School program is providing flexibility for states to meet their specific farm to school needs. Will you please speak to West Virginia's experience and how it has been able to tailor farm to school programs specifically to meet West Virginia's needs? In addition, please speak to how the USDA Farm to School program provides educational and economic benefits to school children and farmers?

Over the past four years, West Virginia has used a number of methods to grow the Farm to School program and tailor initiatives to meet our specific needs. One of the most important things the West Virginia Department of Education (WVDE) Office of Child Nutrition (OCN) did was to form a collaborative partnership with the West Virginia Department of Agriculture, WVDE Career and Technical Education, West Virginia University (WVU) Cooperative Extension Small Farm Center, as well as area non-profits committed to the Farm to School movement. This partnership became known as the West Virginia Farm to School Community Development Group.

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food into the cafeteria. To showcase this collaboration, the WVDE OCN sponsored the Junior Cast Iron Cook-Off, offering the best Pro Start programs in the state an opportunity to compete. For younger students, outdoor classrooms of every shape and size are being funded and a Garden Based Learning (GBL) curriculum was written by one of the outstanding funded schools, North Elementary in Morgantown, West Virginia. This summer, the staff at North Elementary is offering a GBL symposium at their school for up to 100 participants with funding provided by the WVDE OCN.

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Senate Committee on Agriculture, Nutrition & Forestry
A Review of Child Nutrition Programs
May 7, 2015
Questions for the Record
Dr. Sandra Hassink

Senator Stabenow

1. **Question:** Breastfeeding rates continue to grow in the US. Could you tell us a bit about how WIC is playing a role in this and what additional benefits this trend has for the WIC program costs and health outcomes?

   Answer: WIC has played an important role in promoting breastfeeding and improving breastfeeding initiation. WIC promotes breastfeeding as the optimal infant feeding choice and supports mothers by offering lactation consultants, classes and support groups, peer counselors, and educational materials. WIC mothers who choose to breastfeed receive enhanced benefits and retain their eligibility for WIC benefits longer. Those who exclusively breastfeed receive a food package that is both larger and more varied. The breastfeeding rate among WIC participants is rising substantially, with a 39% increase in WIC infants who were breastfed from 2002-2012.[1] The American Academy of Pediatrics (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.[2]

   By promoting breastfeeding and improving breastfeeding initiation, WIC is not only impacting the health of infants but also saving money. WIC infants who are breastfed do not require costly formula, saving the program money. Increases in breastfeeding rates also save the healthcare system money. In fact, if 90% of U.S. mothers exclusively breastfed their infants for 6 months, the U.S. would save $13 billion per year in medical expenses and

[1] *WIC Works: Addressing the Nutrition and Health Needs of Low-Income Families for 40 Years*, Center on Budget and Policy Priorities, May 4, 2015.
[2] AAP Section on Breastfeeding. Policy Statement: Breastfeeding and the Use of Human Milk. *Pediatrics*, 2012; 129; e827.

prevent over 900 deaths annually.[3] In addition to its nutritional benefits that provide the healthiest start for an infant, breastfeeding protects against a number of illnesses and allergies including gastrointestinal tract infections and ear infections, and is associated with reductions in Sudden Infant Death Syndrome and obesity. Infants who are breastfed tend to be healthier since they receive antibodies from breast milk that protect them from infection.

Breastfeeding improves the health of mothers as well. Studies show that women who have breastfed experience reduced rates of breast and ovarian cancer later in life. Some studies have found that breastfeeding may reduce the risk of developing type 2 diabetes, rheumatoid arthritis, and cardiovascular disease, including high blood pressure and high cholesterol.[4]

For those mothers who are not able to breastfeed, the inclusion of infant formula in the infant food package is a vital source of their early nutrition. Cost containment requirements for infant formula contracts in the WIC program have ensured infant formula is available to WIC mothers while also maximizing limited federal resources. Low-income mothers who are not participating in WIC frequently struggle to afford the high price of infant formula. It is not uncommon for these mothers to report diluting formula to extend limited supplies, putting their infants' health at risk.[5]

2. **Question:** Can you explain to the Committee what it means to be nutritionally at risk? Participation in the WIC program, especially for pregnant mothers and infants, has tremendous health and achievement benefits for children as they grow. Could you give us a snapshot of what the individual investment is for a WIC participant versus what we might spend treating preventable illnesses like obesity or preterm births?

   Answer: Each WIC applicant must be determined to be at nutritional risk on the basis of a medical or nutrition assessment by a physician, nutritionist, dietitian, nurse, or some other competent professional authority (CPA), in order to be certified as a WIC participant.

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[3] Bartick, M., Reinhold, A. (2010). The burden of suboptimal breastfeeding in the United States: A pediatric cost analysis. Pediatrics, 125(5), e1048–e1056.
[4] American Academy of Pediatrics. *New Mother's Guide to Breastfeeding, 2nd edition. 2011.*
[5] "How to Safely Prepare Formula with Water." HealthyChildren.org. American Academy of Pediatrics, 5 May 2015. Web

Section 17(b)(8) of the Child Nutrition Act of 1966, as amended, broadly defines nutrition risk as "(a) detrimental or abnormal nutritional conditions detectable by biochemical or anthropometric measures, (b) other documented nutritionally related medical conditions, (c) dietary deficiencies that impair or endanger health, or (d) conditions that predispose persons to inadequate nutritional patterns or nutritionally related medical conditions." This legislative definition is implemented at Section 246.7(e)(2) of the Federal WIC regulations.

The average approximate cost per WIC participant per year is $762.[6] Because WIC reduces the likelihood of adverse birth outcomes, including very low birth-weight babies and improves birth outcomes for high-risk mothers, WIC participation results in savings to the U.S. healthcare system. Medicaid participants on WIC have on average 29% lower Medicaid costs for infant hospitalization compared with those not participating in WIC.[7] Preterm babies cost the U.S. over $26 billion a year[8] and the average first year medical costs for a premature/low birth-weight baby is $49,033 compared to $4,551 for a baby without complications.[9] One study estimated that WIC reduced the probability of low birth weight babies by about 30% and the probability of very low birth weight by about half.[10]

One out of every five children in the United States has overweight or obesity. The estimated annual health care costs of obesity-related illness are a staggering $190.2 billion, or nearly 21% of annual medical spending in the U.S.[11] WIC can help to reduce the risk of obesity among young children in several ways. The fruits, vegetables, and whole grains in the food packages are consistent with recommended food patterns associated with healthy weight and WIC provides nutrition education to all participants. In addition, rising breastfeeding rates among participating mothers may protect against weight gain.

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[6] Calculations based on preliminary 2014 USDA/FNS data ((NSA + Food costs) / total participation). United States Dept of Agriculture. (2015). National Level Annual Summary FY 1974–2014. WIC Program Data.
[7] Gregory, P.M., de Jesus, M.L. (2003). Racial differences in birth outcomes and costs in relation to prenatal WIC participation. N J Med, 100(3), 29–36.
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[9] Thomson Reuters. (2008). The cost of Prematurity and Complicated Deliveries to U.S. Employers. Report prepared for March of Dimes.
[10] Bitler MP, Currie J (2005). Does WIC work? The effects of WIC on pregnancy and birth outcomes. Journal of Policy Analysis and Management, 24(1):73-91.
[11] Cawley J, Meyerhoefer C. The medical care costs of obesity: an instrumental variables approach. Journal of Health Economics. 31(1):219-230. 2012.

Senator Bennet

1. **Question:** Over the last few years, Colorado has experienced increases in access to critical nutrition programs. Our state has a new law that provides breakfast after the bell to all kids in high poverty schools. But breakfast participation across the country is still barely a half of lunch. Often logistical barriers undermine the success of the program. Outside of school, kids, especially in rural communities, face challenges in receiving consistent, reliable, and continuous access to healthy meals. We have a mix of programs and a wide range of providers and sponsors from schools themselves to the Boys and Girls Clubs, parks and food banks. The process and options vary across communities and can be confusing to families. In rural Colorado, the only summer option may be an hour away; that is just too far to travel to eat lunch.

   As we work on reauthorization, it's important we not lose the perspective of a kid -- who is hungry and just trying to get a good meal. Kids in poverty face tremendous barriers and challenges. Some we can help fix, others are much harder. But, being hungry shouldn't be one of them.

   What is the kid's experience in all of this? How can we make it easier for kids from low-income families to have access to healthy meals no matter the time of day or the month of the year? And, if we only do one thing in this reauthorization, what should it be?

   Answer: It is a sad reality that one in six children in this country lives in a household where food is scare. Lack of adequate access to food is a contributor to toxic stress. Toxic stress, a result of prolonged exposure to adverse childhood experience in the absence of caring, stable relationships with adults, can affect the physical, mental, and economic well-being of children well into adulthood. In the shorter term, children may experience educational, health, and behavioral problems as a result of food insecurity. In food insecure households, parents report poorer health and developmental risks in their children including more

frequent stomach aches, headaches, colds, hospitalizations, anemia, and chronic conditions. Parents also report more anxiety, depression and difficulties in school.[12]

Access to healthy meals for children in low-income families no matter the time of day or the month of the year can be difficult, especially in rural areas. However, there are some exciting initiatives and proposals that aim to make year-long access to nutritious meals a reality. The Community Eligibility Provision, included in the *Healthy, Hunger-Free Kids Act of 2010,* streamlined the process for schools with high percentages of low-income children to provide free meals to all students. Offering free breakfast and lunch to the entire student body transforms the school culture, allowing students to enjoy school meals without feeling stigmatized. Schools that implement community eligibility see participation in both breakfast and lunch increase, which means that more children have the energy they need to learn throughout the day.

The American Academy of Pediatrics (AAP) is proud to support efforts by congress to address summer feeding. Specifically, the AAP endorses the bipartisan *Summer Meals Act* introduced by Senators Gillibrand and Murkowski which would better integrate summer education and meals programs and reach more children in rural, underserved, and hard to reach areas. The AAP also strongly supports the *Stop Child Hunger Act*, which has been introduced in the past, that aims to build on the successful summer EBT pilots. Additionally, the Afterschool Meal Program fills the hunger gap that may exist after school for millions of low-income children.

As congress reauthorizes the child nutrition programs and WIC, the AAP would urge lawmakers to put the nutritional needs of young children first by keeping access to WIC strong, promoting breastfeeding, and maintaining science-based nutrition standards for school meals and other foods sold in schools. The AAP also urges congress to expand access to summer feeding programs and sites so that children are receiving nutritious meals year-round, even when they are out of school.

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[12] Nord M, Food insecurity in households with children: Prevalence, severity, and household characteristics.2009 USDA, Economic Research Service.

2. **Question:** Over the law few years, my home state of Colorado has made progress and seen increases in access to critical programs like school breakfast. But kids in Colorado still face significant challenges during the summer months. In Colorado, more than 350,000 kids are eligible for free and reduced price lunch in school. Yet, during the summer, only 19,000 on average participate in the summer meals program. What do the other 300,000 kids do during the summer? Do they simply skip lunch?

   Kids in rural communities face the biggest challenges in accessing meals during the summer. They may not have transportation to a summer site or the site is just too far away. How can we fix this? What changes to the summer meals program would make it easier for kids, particularly those in rural communities, to participate?

   Answer: In the summer months, millions of low-income children lose access to school breakfast, lunch, and afterschool meals that are available during the regular school year. 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.

   The American Academy of Pediatrics (AAP) has endorsed the *Summer Meals Act of 2015* (S. 613), intended to support and expand summer feeding programs. This bill, by Sens. Kristen Gillibrand (D-NY) and Lisa Murkowski (R-AK) would ensure that low-income children have access to healthy food throughout the summer. This legislation attempts to better integrate summer education and meals programs by lowering the threshold of low-income children eligible for free or reduced-price meals for participation in the Summer Meals Program. The bill also aims to reduce red tape for public-private partnerships that operate summer programs and to improve nutrition in rural, underserved, and hard to reach areas.

   In the past, the AAP supported legislation introduced in the 113th Congress by Senator Patty Murray (D-Wash.) called the *Stop Child Summer Hunger Act of 2014* (S. 2366). This legislation, which aims to reduce child hunger during the summer months, would establish a program under the USDA to provide families who have children eligible for free- and reduced-price school meals with an electronic benefit transfer (EBT) card. The EBT card will include $150 per eligible child that families can use to purchase food to replace the meals their children

would otherwise be receiving at school. EBT cards provided under this program may only be used to purchase food from retail food stores that have been approved for participation in SNAP.

Other strategies that make it easier for communities to establish summer feeding sites in underserved areas and also give communities the flexibilities to reach kids in alternate ways should be considered. Allowing communities to adopt alternate program models in areas where children lack access to a program site could ensure more kids have the nutrition they need. This includes proven strategies such as waiving the requirement that kids consume meals on site, allowing communities to send meals home with children, or giving families a grocery card to supplement their household food budget.

3. **Question:** Across the country, many fewer students participate in school breakfast programs than in school lunch program. On the average day, just half the number of kids who eat lunch also eat breakfast. How can we support and encourage creative and innovative approaches to breakfast in order to reach more kids?

   Answer: School breakfast participation improves children's dietary intake, decreases the risk of food insecurity, helps improve children's academic performance, and may protect against childhood obesity. Expanded availability, accessibility, and participation in the School Breakfast Program is one of the best ways to support the health and academic potential of children, particularly low-income children. Significant progress has been made in recent years to expand participation in the School Breakfast Program, however, there is ample opportunity for continued growth. Making breakfast a part of the school day dramatically increases participation by making it convenient and accessible to all. Offering breakfast in the classroom or in a grab-and-go setting, where students eat breakfast at the beginning of the school day, dramatically increases participation.

   The Community Eligibility Provision, included in the *Healthy, Hunger-Free Kids Act of 2010,* enables high poverty schools to serve free breakfast and lunch to all students, transforming the school culture and allowing students to enjoy school breakfast without feeling stigmatized. Schools that implement community eligibility see participation in both breakfast

and lunch increase, which means that more children have the energy they need to learn throughout the day.

Senator Brown

1. **Question:** This is one of the most important issues this committee deals with and I hope we can continue to do so in a bipartisan way.

   Dr. Hassink, thanks for your testimony. You provide excellent testimony on why we need the WIC program—the first years of a child's life are so important and we increasingly know the value of pre-and-postnatal nutrition for women and children. Ohio, unfortunately, is 48th in the country in infant mortality rates. Further, about 12.1% of babies born in Ohio were born before the 37th week of pregnancy. This is unacceptable and something I've been working on with a number of stakeholders to improve. Yet, it's my understanding that Ohio reaches only 57.3% of those eligible to participate in the WIC program—this is about 6% lower than the national average.

   Can you talk to us about the role WIC could play in helping the nation lower our infant mortality rates and reduce the rate of premature births?

   Answer: Numerous studies have shown that women who participate in WIC give birth to healthier babies who are more likely to survive infancy. Adequate maternal health and nutrition during pregnancy, along with early prenatal care, can help reduce some of the leading risk factors for infant mortality, specifically premature birth and low birth-weight. WIC connects pregnant mothers to essential medical care, the nutritious foods pregnant women need, and social services; as a result, WIC participants are more likely to give birth to healthier infants than non-participants.[13] WIC prenatal care benefits have been shown to reduce the rate of low birth-weight babies by about 30% and very low birth-weight babies by

[13] *WIC Works: Addressing the Nutrition and Health Needs of Low-Income Families for 40 Years*, Center on Budget and Policy Priorities, May 4, 2015.

almost half in one study and prenatal WIC participation is associated with longer pregnancies resulting in fewer premature births.[14]

Pregnant women who participate in WIC have access to maternal, prenatal, and pediatric health-care services. These women seek prenatal care earlier in pregnancy, consume more of key nutrients such as iron, protein, calcium, Vitamins A and C, and experience fewer fetal and infant deaths. Many factors contribute to infant mortality, including the quality of health care and maternal nutrition. WIC reduces the risk of infant mortality by connecting expectant mothers to essential prenatal health care, promoting healthy eating through nutrition assessments and counseling, and providing healthy foods tailored to the specific needs of pregnant women and their babies. Several studies suggest that prenatal WIC participation is associated with reductions in infant mortality. In fact, a recent study in Ohio found a lower infant mortality rate among WIC participants (8.0 infant deaths per 1,000 live births) than non-WIC participants (10.6). The difference was even more pronounced for African Americans, with a rate of 9.6 among WIC participants compared to 21.0 among non-WIC participants.[15]

Senator Casey

1. **Question:** I appreciate AAP's recommendation to the Committee to find ways to promote breastfeeding in the WIC program, as well as to look for ways to extend WIC eligibility for children to age 6. I hear from my constituents, including mothers in the Witnesses to Hunger program, who recommend the same. Children who turn 5 years old are cut off from WIC, but may not yet be in school, receiving school meals. What do you think the effect would be on young children if this nutritional gap were filled?

   Answer: Extending WIC eligibility for children up to age 6 would assure a continued strong health and nutrition foundation and help ensure there are no nutritional and health care

[14] Bitler MP, Currie J (2005). Does WIC work? The effects of WIC on pregnancy and birth outcomes. Journal of Policy Analysis and Management, 24(1):73-91.
[15] Khanani I, Elam J, Hearn R, Jones C, Maseru N (2010). The impact of prenatal WIC participation on infant mortality and racial disparities. American Journal of Public Health, 100 (Supplement 1):S204-S209.

lapses prior to school entry. It is a sad reality that one in six children in this country lives in a household where food is scare. Lack of adequate access to food is a contributor to toxic stress. Toxic stress, a result of prolonged exposure to adverse childhood experience in the absence of caring, stable relationships with adults, can affect the physical, mental, and economic well-being of children well into adulthood. In the shorter term, children may experience educational, health, and behavioral problems as a result of food insecurity. In food insecure households, parents report poorer health and developmental risks in their children including more frequent stomach aches, headaches, colds, hospitalizations, anemia, and chronic conditions. Parents also report more anxiety, depression and difficulties in school.[16] Ensuring that children have access to nutritious foods until they start school will reduce the risk of toxic stress and help them be ready to learn, all while reducing their risk of childhood obesity and other chronic diseases. Good nutrition is a key component of school readiness. WIC eligibility until school entry would ensure that children enter school ready to learn.

2. **Question:** In your testimony, you mention that just like we vaccinate to protect against the flu, we can provide pregnant women and children with nutritional assistance and breastfeeding support to protect against chronic disease. It may be a stretch, but could we call WIC and other child nutrition programs a vaccination against conditions like malnutrition and obesity?

   Answer: Much like a vaccine works by preventing the onset of an illness, nutritional assistance programs like WIC provide mothers and children with protection from chronic diseases. We know that a healthy weight and absence of hunger in infancy and childhood set the stage for lifelong health. Preserving access and minimizing barriers to enrollment in programs like WIC, school meals and others, as well as ensuring the high nutritional quality of the meals we give our children offer the best chance at success in combatting the double burden of food insecurity and obesity.

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[16] Nord M, Food insecurity in households with children: Prevalence, severity, and household characteristics.2009 USDA, Economic Research Service.

Senator Heitkamp

1. **Question:** Dr. Hassink, I'd like to ask you about nutrition education and its role in promoting healthy kids as well as families. In North Dakota, we have school districts as well as NDSU Extension doing incredible work in this area. Based on your experience or knowledge, how have you seen nutrition education both children and parents accept and embrace healthier meals?

   Answer: Nutrition education, especially through programs like WIC, School Meals, and SNAP, plays an important role in combatting the double burden of obesity and food insecurity. Nutrition education is a significant way to encourage healthy eating, build lifelong good habits, and combat our nation's obesity epidemic. In fact, the nutritional knowledge and cooking skills of parents are critical factors associated with the development of overweight and obesity in children. Mothers who participate in WIC receive quality nutrition education and gain the skills to prepare nutritious and tasty meals. Children who participate in nutrition education programs are exposed to a wide variety of ingredients and flavors and share their newfound knowledge of healthy eating with their parents. By introducing nutritional knowledge and food preparation skills we can ensure that the children and their parents develop good habits and foundational knowledge that gives them the best chance at a healthy, successful life.

Senator Leahy

1. **Question:** Farm to School Innovation: I authored a provision in the 2004 Child Nutrition and WIC Reauthorization Act which was expanded in the Healthy Hunger-Free Kids Act of 2010, to establish the Federal Farm to School program. By connecting schools with local agricultural producers, children have gained healthy eating habits, while learning about the importance of where their food comes from. Meanwhile, farmers in surrounding areas are reaping economic benefits and contributing to the livelihood of their communities.

   The American Academy of Pediatrics (AAP) supports the *Farm to School Act of 2015*. Of the many benefits of Farm to School are the improvements it offers to child health, and the

strong foundation in nutrition education from an early age that the program provides. When kids participate in Farm to School activities like school gardens, taste tests, cooking demonstrations, and farm tours, they are more willing to try new and healthier foods. A cornerstone of the Farm to School Act is providing flexibility to local school districts to include preschools in the USDA Farm to School program.

Can you explain why Farm to School is so essential at the preschool level, and how these programs can resonate with children of such a young age?

Answer: The AAP is proud to be a strong supporter of the *Farm to School Act of 2015* and we thank you and Senator Cochran for introducing such important legislation. Farm to School is one of the many programs that shapes healthy habits for our children. By providing educational activities for children and engaging children directly in hands on learning through gardening, farm to school exposes children to the source of their food and helps cultivate a passion for healthy, nutritious foods in the school and preschool setting that kids hopefully take home to their parents. Experiential food education for our nation's youngest children in early childcare and education settings can shape lifelong nutritional habits. The first years of life are formative for developing healthy eating habits, and farm to preschool starts kids on the right path.

2. **Question:** Dairy consumption has long been proven to combat serious diseases such as osteoporosis, and is crucial to a young person's diet, as well as pregnant and breastfeeding women.
   In your testimony, you discuss the importance of implementing healthy foods at a young age to combat obesity-related diseases later-on. You also speak about the noticeable lack of folate and iron in pregnant women and youth diets, which is negatively impacting brain development.

   The FDA has cited that many Americans are falling short on nutrients of concern such as calcium, potassium, and Vitamin D. Milk and other dairy products play a vital role in helping Americans, especially children, meet the recommended intakes of these critical nutrients. However, today we are facing challenges with a decrease in dairy consumption among all

Americans, especially our youth who are being heavily marketed to by companies advertising soft drinks, energy beverages, and sports drinks that do not have any nutritional benefits. What suggestions do you have for how we can reverse this trend and help ensure children meet the recommended intake of these critical nutrients, especially calcium?

Answer: Milk consumption, especially during the school day, is critical and is correlated with overall diet quality as well as calcium intake.[17] In fact, fluid milk is the primary source of 3 of the 4 nutrients the 2010 Dietary Guidelines for Americans labeled as nutrients for concern (calcium, vitamin D, and potassium). Concerted public and industry efforts, grassroots advocacy, local school wellness polices, and state and federal regulations have resulted in great improvements in nutrition quality in schools, especially with regard to milk consumption. The *Healthy, Hunger-Free Kids Act of 2010* required that all milk served in school lunches must be fat-free if it is flavored or 1% or less if it is unflavored.

Increasing access to the School Breakfast Program would help ensure that children have a greater intake of these key nutrients. Eating breakfast regularly has been linked with increased consumption of fiber, calcium, iron, Vitamin C, and other vitamins and minerals, and lower intake of fat, cholesterol, and sodium.[18] Children who participate in school breakfast are more likely to consume fruit and milk at breakfast.[19] Additionally, we should encourage children's discretionary calorie intake, such as foods and beverages consumed outside of the school lunch or school breakfast programs, to be nutrient rich—striking a balance between reducing excess calories, solid fats, added sugars, and sodium.

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[17] AAP Council on School Health and Committee on Nutrition. Policy Statement: Snacks, Sweetened Beverages, Added Sugars, and Schools. *Pediatrics,* 2015; 135:3.
[18] *Breakfast for Health*, Food Research and Action Center, Spring 2014.
[19] Condon, E. M., Crepinsek, M. K., & Fox, M. K. (2009). School meals: types of foods offered to and consumed by children at lunch and breakfast. Journal of the American Dietetic Association, 109(2 Supplement 1), S67-S78.

Senate Committee on Agriculture, Nutrition & Forestry
A Review of Child Nutrition Programs
May 7, 2015
Questions for the Record
Ms. Cindy Jones

Senator Stabenow

1. During the hearing, you noted that schools with lower rates of free and reduced price students are disadvantaged because they do not have access to same grant opportunities. Please tell the Committee about some of the ways grants could help to improve your operations.

The Fresh Fruit and Vegetable Program (FFVP) provides children in participating elementary schools with a variety of free fresh fruits and vegetables. Schools selected for participation receive additional funds to offer free fresh fruits and vegetables to elementary students in one or more areas at times other than meal service periods. Priority is given to schools with the highest percentage of students eligible for reduced price or free school meals. This is the key selection criterion.

The Food Service Equipment Assistance Grant provides funding for new equipment, renovation or replacement of equipment. Any participating NSLP sponsor may apply, but priority is given to schools with 50% or more of students' eligible for reduced price/free meals. For base or central kitchens, the percentage of students eligible is the total eligible for reduced price/free meals at all schools served from the base/central kitchen divided by the total enrollment for all of these schools.

2. Do you intend to apply for a whole grain exemption?

Our district does not intend to apply for a whole grain exemption. The waiver is only good thru the 2015-16 school year. It is far too confusing and frustrating for the students if we return some of their favorite items and then take them away again after one year. We would like to see that only 50% of our grains be whole grain rich. That is what is recommended by the American dietary guidelines.

Senator Bennet

1. Over the last few years, Colorado has experienced increases in access to critical nutrition programs. Our state has a new law that provides breakfast after the bell to all kids in high poverty schools. But breakfast participation across the country is still barely a half of lunch. Often logistical barriers undermine the success of the program. Outside of school, kids, especially in rural communities, face challenges in receiving consistent, reliable, and

continuous access to healthy meals. We have a mix of programs and a wide range of providers and sponsors from schools themselves to the Boys and Girls Clubs, parks and food banks. The process and options vary across communities and can be confusing to families. In rural Colorado, the only summer option may be an hour away; that is just too far to travel to eat lunch.

As we work on reauthorization, it's important we not lose the perspective of a kid -- who is hungry and just trying to get a good meal. Kids in poverty face tremendous barriers and challenges. Some we can help fix, others are much harder. But, being hungry shouldn't be one of them.

What is the kid's experience in all of this? How can we make it easier for kids from low-income families to have access to healthy meals no matter the time of day or the month of the year? And, if we only do one thing in this reauthorization, what should it be?

Colorado is very fortunate to have their State's support in breakfast programs. In Kansas we do not receive any funding for breakfast programs. We only receive $.04 per lunch and this has not increased in over 30 years. It actually decreased by $.005 a few years ago. It would be amazing!! In our district we have universal free breakfast programs at five of our elementary schools. Each school day begins with breakfast in their classroom. Wouldn't be wonderful if every student receive a free breakfast in their classroom as part of their day!

We only receive the reimbursement for the status of the students eating the breakfast. In 2014-15 we received $.28 for a paid student, $1.63 for a reduced student and $ 1.93 for a free student. We can only have this program at sites with a high amount of free students. We have to be are able to absorb the cost of the paid and reduced students. If we received additional funding for breakfast we could expand the program. For example if we were able to receive the same funding for a reduced and paid student at schools that are 50% free and reduced, we could add 5 additional sites with a total of 800 students. This would be an additional $262,480 for an entire school year. If you consider that amount of money spent on education, I believe this would be an amazing investment on the health and success of our children. What could be more important?? I would like to see additional funding for breakfast programs to be included in reauthorization.

We have seven summer sites in our district. We also meet with churches and a local food reclamation organization to reach more children. It is a very challenging program. In the summer many children are left alone and it is too far for them to go to receive meals. We have discussed possibly using one of our trucks to travel to different location where children may be. It would, however, be very challenging. We would have to get approval for each stop that we would make and make sure the students are eating while we observe. If we could use the truck as a site and allow the students to get there meals without observing them, we could travel to many location. We could travel to swimming pools, libraries, community centers, parks etc. Think how many children we could reach! We need to have more flexibility in order for this program to reach all the children who desperately need it.

Over the law few years, my home state of Colorado has made progress and seen increases in access to critical programs like school breakfast. But kids in Colorado still face significant challenges during the summer months. In Colorado, more than 350,000 kids are eligible for free and reduced price lunch in school. Yet, during the summer, only 19,000 on average participate in the summer meals program. What do the other 300,000 kids do during the summer? Do they simply skip lunch?

I am sure that some student may skip lunch which is heartbreaking, that is why we are continuing to look for different options to reach the children who need us.

Kids in rural communities face the biggest challenges in accessing meals during the summer. They may not have transportation to a summer site or the site is just too far away. How can we fix this? What changes to the summer meals program would make it easier for kids, particularly those in rural communities, to participate?

I think adding mobile options with less stringent requirements could make a big difference.

2. Across the country, many fewer students participate in school breakfast programs than in school lunch program. On the average day, just half the number of kids who eat lunch also eat breakfast. How can we support and encourage creative and innovative approaches to breakfast in order to reach more kids?

Breakfast participation will likely always be lower than lunch participation. Many children eat breakfast at home before leaving for school. This is a convenient and cost effective breakfast option for many families. Lunch, on the other hand, must be eaten at school, and the convenience of purchasing a lunch at school becomes an attractive lunch option than 'packing a lunch' for many families.

Senator Casey

1. I've heard from many school districts that are experiencing challenges with implementing the changes, but I have also heard success stories from a wide variety of schools. You noted in your testimony that reduced participation has put a financial strain on many school districts. Are there productive and creative ways that could be implemented to attract students back to schools meals? For example, I've heard from school districts in Pennsylvania that experienced increased participation after getting their students involved in food selection and

taste testing and then incorporating the "new foods" into the school meals or giving out take-home cards with recipes. Some schools have also reduced sodium but added flavor by using spices. In your opinion, do you think programs like this would be effective to get students excited about trying new foods?

We have included our students in making menu selections for many years. We also give our students samples of new items before they are served on the menu. We have found that sprinkling herbs onto reduced sodium food will not replace the flavor of food that is seasoned properly with salt. This is only possible if a person makes a total diet change of all the meals they eat. If you assume that a student eats 3 meals per day 365 days per year and that same student eats lunch every day at school during the school year, only 15% of the meals that student eats in a year's time will be school lunch. You cannot reduce sodium and change flavor profiles of all grain products in only 15% of the meals someone eats and expect the person to become accustomed to those flavor changes. The other 85% of the meals the student eats outside of school will be where the taste preferences are established.

2. In your testimony, you noted the challenges that you have encountered from a reduced sale of a la carte items under the Smart Snacks provision. I understand the financial burden that that has placed on your districts. However, shouldn't we be **encouraging** our students to set better eating habits and expose them to new foods and new ways of preparing foods to set them on a path for healthy eating for their future?

We had to take many healthy items off our a la carte menus. Items such as our fresh-to-go salads had to be taken off the menu because the small amounts of meat, cheese and dressing did not meet the sodium and fat requirements. It is very difficult to find items to meet new requirements. If it is included in a meal, you can analyze the complete day/week of meals and can be balanced with the other meal components. Allowing items permitted to be served as part of a reimbursable meal to also be sold a la carte would increase the healthy options available to our students.

Encouraging our students to eat more healthful foods is always better than forcing a lot of strict nutrition standards onto the students all at one time. We have been encouraging students to make a number of more healthful food choices for years. One of the major differences is that we were able to quietly make just a few changes at a time without all the media and political hype of this recent controversial "school meal reform."

Senator Heitkamp

1. Ms. Jones, when our school food managers were in town they discussed the whole wheat and requirements being an issue. Have the flexibilities USDA provided on this issue been helpful? Do you think we will reach a point where we won't need the waiver

Our district has not applied for the whole grain waiver. The waiver is only good thru the 2015-16 school year. It is far too confusing for the students if we return some of their favorite items and then take them away again after one year. If a foodservice establishment creates frustration among their customers, the customers don't return. Those customers will bring unregulated food from home, or worse yet, choose not to eat and try to perform without nourishment during the school day. We would like to see that only 50% of the grains be whole grain rich. That is what is recommended by the Dietary Guidelines for Americans.

Senate Committee on Agriculture, Nutrition & Forestry
A Review of Child Nutrition Programs
May 7, 2015
Questions for the Record
Mr. Stephen Lord

Senator Stabenow

1. **You mention that your survey results for standard verification are "non-generalizable," meaning we can't just assume that the same error rates would apply to all populations within the school lunch and breakfast programs. Can you explain why this is the case?**

   GAO's Response: For our May 2014 report, we conducted a limited test of the entire population of beneficiaries (millions of individuals) who qualified for the programs based on their stated incomes or other eligibility criteria.[1] Thus, our results are not projectable to the entire population of beneficiaries who qualified for the programs in this manner. We used a nonprobability sampling approach because it allowed us to establish vulnerability to fraud. However, because of the selected and limited nature of the sample, this approach does not allow us to describe the characteristics of the entire population, as we might do with a probability sample. In this case, that means we do not know what the error rates are within the population of beneficiaries, only that the process is vulnerable to errors (as identified through our sample).

2. **The Healthy Hunger Free Kids Act set a target of 95 percent rate of direct certification. As more states approach this goal, do you anticipate a continued reduction in improper payments?**

   GAO's Response: Direct certification has the potential to help reduce improper payments in the school-meals programs. In our May 2014 report, we highlighted the U.S. Department of Agriculture's (USDA) efforts to increase—through the direct-certification process—automatic enrollment for students who receive Supplemental Nutritional Assistance Program (SNAP) benefits; this program has a more-detailed certification process than the school-meals programs.[2] We reported that direct certification also reduces the number of applications school districts review, which, according to USDA officials, could lower the possibility of an administrative error. According to USDA Office of Inspector General figures, SNAP has a lower improper payment rate than the School Breakfast and National School Lunch Programs. In addition, in its second iteration of its study titled *Access, Participation, Eligibility and Certification*, issued in May 2015, USDA reported that the improper-payment rate associated with household applications was 14 percent compared with about 4 percent for direct certification.

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[1]GAO, *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).

[2]GAO-14-262.

Senator Casey

1. **In your testimony, you discuss direct-verification computer matching, where data used in some means-tested programs could be used to verify school meal eligibility. Have you had the opportunity to examine computer matching in other situations? I imagine state agencies have a variety of data-keeping systems, for example one state's human services department may have a different data system than its education department. Was it easy for states and Federal agencies to implement computer matching in other situations? How effective has computer matching been at reducing improper payments?**

   GAO's Response: Computerized matching of data from two or more information systems is one method of data analysis that can assist in detecting and preventing fraud, waste, and abuse in government programs, and it is commonly used to help identify improper payments in federal benefit programs and activities. As part of our January 2014 report on implementation of certain amendments to the Privacy Act of 1974 (collectively referred to as the Computer Matching Act) by selected federal agencies, we cited examples of agencies' use of computer matching to help ensure that federal benefits are distributed appropriately.[3] As part of that work, we did not conduct an assessment on the ease of implementing computer matching for agencies nor on the overall effectiveness in reducing improper payments of this approach. However, our January 2014 report presented some examples of agencies' use of computer matching and some positive outcomes, as follows:

   - The National Directory of New Hires was used to match new-hire information from states with information from other states and federal programs to detect and prevent erroneous payments in the Temporary Assistance for Needy Families program, Supplemental Nutrition Assistance Program, unemployment insurance, Medicaid, and other benefit programs.
   - According to the Chairman of the House Committee on Ways and means,[4] the Social Security Administration (SSA) collected prisoner data from states and local governments to identify incarcerated individuals who should not receive Supplemental Security Income benefits. The chairman stated that from 1997 to 2009 computer matching had helped SSA identify over 720,000 inmates who were improperly receiving benefits, contributing to billions of dollars in savings to the federal government.
   - Likewise, the chairman also reported that the Public Assistance Reporting Information System was used to match state enrollment data for the Temporary Assistance for Needy Families program, Supplemental Nutrition Assistance Program, Medicaid, and child-care programs with data from participating states and a selected group of federal databases to identify potentially inappropriate payments. According to the Subcommittee on Human Resources of the House

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[3]GAO, *Computer Matching Act: OMB and Selected Agencies Need to Ensure Consistent Implementation*, GAO-14-44 (Washington, D.C.: Jan. 13, 2014).

[4]Hearing on the Use of Data Matching to Improve Customer Service, Program Integrity, and Taxpayer Savings. Committee on Ways and Means, Subcommittee on Human Resources, U.S. House of Representatives, Mar. 4, 2011.

Committee on Ways and means,[5] the state of Colorado realized a return on investment of 4,000 percent from using the system, and the state of New York annually saves an average of $62 million through its participation in the system.

[5]Hearing Advisory for the Hearing on the Use of Data Matching to Improve Customer Service, Program Integrity, and Taxpayer Savings. Committee on Ways and Means, Subcommittee on Human Resources, House of Representatives, Mar. 4, 2011.

Senate Committee on Agriculture, Nutrition & Forestry
A Review of Child Nutrition Programs
May 7, 2015
Questions for the Record
Ms. Zoë Neuberger

Senator Stabenow

1. Both the GAO and the recent OIG report note that, during standard verification, over 50% of households were deemed ineligible simply because they did not return the verification forms. But this does not mean all of the households were income ineligible. Could you explain some of the other reasons a household might be deemed ineligible during this verification process? I understand USDA is developing a new model paper application as well as an electronic application. How might these changes help to reduce errors?

You are correct that if a household does not respond to a school district's request for verification it is *not* an indication that they are ineligible. There are many reasons why a household might not respond to a request for their personal income information from the school.

In a study of the verification process in metropolitan areas, USDA found that out of all families selected for verification, one of every three families lost their free or reduced-price meal benefits despite being *eligible* for such meals. While that was not a nationally representative study, it confirms that there are reasons aside from ineligibility why parents do not respond to the verification notice. They may not receive the notice, which is especially likely if the family has recently moved. They may not be able to read the notice due to limited literacy or English skills. They may not understand what the notice is asking for or the consequences of not responding. They may not regularly receive a pay stub and may fear retaliation from their employer if they ask for one. They may have concerns about privacy; this concern is raised especially frequently in small or rural communities where school staff may also have interactions with the family outside of school.

In addition, the percentage of households in the GAO and OIG reports that lost eligibility because they did not respond to the verification notice cannot be extrapolated to locations beyond the limited number included in their reports. In contrast, the Food and Nutrition Service at USDA has

data on the results of the verification process for every school district in the country. Based on that data, in the fall of 2013, 35 percent of households did not respond to the verification notice and those children stopped receiving free or reduced-price meals regardless of whether they were eligible. It is also important to note, however, that the verification process does not provide a measure of erroneous eligibility determinations. Apart from the fact that many *eligible* families lose free or reduced price meals, the verification process focuses on error-prone applications and therefore is not representative of all recipients of free or reduced-price meals.

USDA has already published a new model paper application, which is now available for any school district to use for the 2015-2016 school year. USDA designed the new application in conjunction with the Office of Personnel Management's Innovations Lab using human-centered design principles. The new model was designed to make it clearer to parents what information is being asked of them to reduce the likelihood of incorrectly reporting household circumstances and it was tested in focus groups while it was being developed. It was also designed to minimize the likelihood that school staff make mistakes when making an eligibility determination. The instructions on the application itself are clearer than on past versions and make it easier to see where more detailed instructions are available.

In addition to the model paper application, USDA is embarking on developing their first model electronic application. Existing electronic applications that school districts use do not take full advantage of the possibilities of the electronic environment to enhance accuracy. For example, an electronic application could ask probing follow-up questions if a parent lists a certain kind of income or it could provide a link next to each question that leads to detailed instructions. In addition, electronic applications eliminate the possibility of data entry errors by school officials. By making a model electronic application available at no charge to school districts around the country, USDA will allow them to begin using an electronic application without having to purchase one or invest in its development. USDA's model will also encourage software companies that design their own electronic school meal applications to make fuller use of the electronic environment to improve accuracy.

Senate Committee on Agriculture, Nutrition & Forestry
A Review of Child Nutrition Programs
May 7, 2015
Questions for the Record
Mr. Brian Riendeau

Senator Stabenow

1. **The summer meals program was designed with the intent of filling the gap during the summer for children that usually eat at school. But it is barely reaching a fraction of those kids. You mentioned the administrative challenges of operating multiple different programs. What are some ways that we could simplify the administration of these programs? Do you believe reducing administrative burdens would increase the ability for sponsors to participate in summer meals programs?**

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 burden. We work with afterschool programs to provide them with hot, 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 – and in our case operating in Kentucky and Indiana, that's four of everything!

- Duplicative administrative requirements: Within each state we have two different contacts and different sets of rules, regulations and methods for running each program. We have to apply twice to each state agency, 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. This 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 be available to nonprofit organizations and local

government agencies. Operating a single program year-round is the simplest solution, but it is critical for program operations to be streamlined through the best available mechanism to address very specific operational pain points mentioned above. 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 or to more sites and incentivize new sponsors and sites to come on board. This would allow 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, if they can find 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. When sites only operate part of the year, families must also 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.

2. **In addition to providing healthy meals, one of the strengths of the Summer Food Service Program is that it provides structured activities for students in the summer time, reducing the summer learning gap and providing a safe environment for kids when school is not in session. Still, some programs struggle to operate programs daily and have expressed frustration over not reaching as many kids as they would like. Do you believe that we can both provide flexibility for operators and protect and strengthen the congregate model that has so many benefits for student growth? What are the best ways to accomplish this goal?**

The site-based, congregate model is important. However, it is currently only reaching 18 percent of kids who receive free and reduced price school lunches nationally, and only 10 percent in Kentucky. This is not good enough. We believe that by providing community providers some flexibility in the options available for hard to reach and underserved areas, we can expand 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. Additionally, many providers in rural areas are only able to find sites – such as a church camp – that are open a few days a week. In other areas, there is no viable location for a site. Given the long distances to deliver meals to these sites and the few children that attend them, these sites are often unsustainable. However, through private funds our sister food banks have found that by distributing meals that kids can take home when the site is not open, participation increases making the congregate site programs stronger and more sustainable.

Communities should have the ability to pick a summer feeding model that works best in their unique circumstances. We see these options working together in a complimentary 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.

Senator Bennet

1. **Over the last few years, Colorado has experienced increases in access to critical nutrition programs. Our state has a new law that provides breakfast after the bell to all kids in high poverty schools. But breakfast participation across the country is still barely a half of lunch. Often logistical barriers undermine the success of the program. Outside of school, kids, especially in rural communities, face challenges in receiving consistent, reliable, and continuous access to healthy meals. We have a mix of programs and a wide range of providers and sponsors from schools themselves to the Boys and Girls Clubs, parks and food banks. The process and options vary across communities and can be confusing to families. In rural Colorado, the only summer option may be an hour away; that is just too far to travel to eat lunch.**
   As we work on reauthorization, it's important we not lose the perspective of a kid -- who is hungry and just trying to get a good meal. Kids in poverty face tremendous barriers and challenges. Some we can help fix, others are much harder. But, being hungry shouldn't be one of them.
   What is the kid's experience in all of this? How can we make it easier for kids from low-income families to have access to healthy meals no matter the time of day or the month of the year? And, if we only do one thing in this reauthorization, what should it be?

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. Like your question indicates, we strive to keep children and their families 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.

If we could do one thing in reauthorization, we should 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, the 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 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 is to provide communities different options for ways to get food to kids, such as by providing families with a summer EBT card. 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 model was significantly higher than the percentage of eligible children served through traditional site-based SFSP program, which was nearly 18 percent in 2014.

Communities should have the ability to pick a summer feeding model that works best in their unique circumstances. We see different program options like summer EBT working together in a complimentary 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.

Another way to provide consistency for families and children is to allow community providers like food banks to operate one program – the Summer Food Service Program – year-round rather than having to switch from the Child and Adult Care Food Program to serve children afterschool to the Summer Food Service Program to serve the same children during the summer, often at the same site. When sites are able to stay open year round, this makes it easier on families and kids to have consistency around what to expect and where to go. When sites only operate part of the year, families must also bounce around until they find something that is open. Streamlining operations would reduce administrative costs, encouraging more providers to get involve and existing providers to expand their operations.

2. **Over the law few years, my home state of Colorado has made progress and seen increases in access to critical programs like school breakfast. But kids in Colorado still face significant challenges during the summer months. In Colorado, more than 350,000 kids are eligible for free and reduced price lunch in school. Yet, during the summer, only 19,000 on average participate in the summer meals program. What do the other 300,000 kids do during the summer? Do they simply skip lunch?**

   Kids in rural communities face the biggest challenges in accessing meals during the summer. They may not have transportation to a summer site or the site is just too far away. How can we fix this? What changes to the summer meals program would make it easier for kids, particularly those in rural communities, to participate?

As mentioned above and in my testimony, the best way to reach more children during the summer months, especially those in rural communities, is to allow communities to adopt programs that fit their needs. First and foremost, we should expand the summer EBT program. This removes so many of the transportation and other logistical barriers for families and providers. It gives families the resources they need to feed their children at home. USDA's evaluation of the summer EBT demonstration projects show the program did just that – children's food security improved as did the nutrition quality of the foods they consumed. Additionally, 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, such as through backpack meal programs or meal delivery options

mentioned in my testimony. We see these different program options working together in a complimentary way to allow good nutritious food to reach more children in the summer.

3. **Across the country, many fewer students participate in school breakfast programs than in school lunch program. On the average day, just half the number of kids who eat lunch also eat breakfast. How can we support and encourage creative and innovative approaches to breakfast in order to reach more kids?**

While the most glaring gaps in child nutrition programs can be found during out-of-school times, there are also important areas for improvement in school breakfast. Only half of children receiving lunch assistance eats school breakfast, and more can be done to improve access to this most important meal of the day.

Many potential factors could cause an eligible child not to participate in a breakfast program, but one of the most basic relates to scheduling challenges and stigma associated with traditional cafeteria-based breakfast programs. One improvement from the last reauthorization was the adoption of the Community Eligibility Provision, which allowed schools with high percentages of low-income children to provide free breakfast and lunch to all students. So far this option has been very successful and participating schools have seen increases in participation by children in the school meal programs including breakfast, while also reducing labor costs and increasing federal revenues.

Additionally, adopting alternative breakfast models can provide access to breakfast in effective but nontraditional ways. For example, rather than providing a service-line breakfast in the cafeteria where children sit down to eat, schools can provide meals that students pick up at kiosks or carts, or are delivered to classrooms so that children can eat breakfast at the start of their school day. Meals can be prepared off-site and can be served hot or cold, depending on school facilities.

In addition to removing the stigma associated with eating school breakfast, these alternative models are an effective solution when bus schedules do not deliver students to school in time to eat a cafeteria-style breakfast before class. By taking breakfast out of the cafeteria and making it part of the school day, more students participate and experience the benefits of school breakfast, such as

reduced school tardiness, disciplinary referrals, and visits to the nurse's office. Further, the increase in participation through these alternate models allows the program to leverage economies of scale and bring additional resources to schools.

Senator Brown

1. **This is one of the most important issues this committee deals with and I hope we can continue to do so in a bipartisan way.**
   One of the challenges we're seeing in Ohio and across the country in addressing summer hunger is the continued suburbanization of poverty. School districts, like those in suburban Marion, Ohio, see increasing numbers of kids in need of programs like summer meals and afterschool meals, but they aren't necessarily set up to operate those programs. How have you seen schools and community organizations work to address this issue? What barriers have stood in their way?

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.

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 complimentary 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.

Senator Casey

1. **Summer is challenging for many families because not only do they need to feed their children, but they have to find childcare, which is often difficult for working parents. Having a safe play for kids to go when they are not in school is critical. The Philadelphia Parks and Recreation Department has a very successful program called Play Streets, which allows residents to get a permit to block off side roads and supervise kids playing outside. In addition, the Parks and Rec Department provides a meal and a snack for the participants through a state subsidy. Do you think this type of model could translate to other areas?**

Food banks and our local partners across the country are creative and constantly exploring innovative ways to feed more kids in the summer. The model you described is a great example of such innovation. USDA as well as Feeding America and other national partners share best practices and resources to help spread and translate successful models across the country. Summer sites are often hosted at libraries or mobile reading programs, so that kids receive educational opportunities throughout the summer. Other programs connect with AmeriCorps, college programs, or other volunteer-based programs so that kids receive mentorship from their older peers.

No two communities are the same and sharing success stories helps us find the right model to fit a communities' needs. In that same vein, our food bank would benefit from having even more program models available in order to reach more kids. Some communities have the infrastructure to support summer feeding sites where children are able to access them. Many more communities struggle to establish sustainable sites. Alternate summer program models like summer EBT and non-

congregate feeding models such as backpacks or meal delivery, should be available to help reach children who don't have a Parks and Recreation Department or community organization in their neighborhood that can run some of these successful summer feeding sites.

We see these different program options working together in a complimentary 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. **You noted in your testimony the challenges with transportation to summer feeding sites that children face in rural, urban and suburban areas for a variety of reasons. Alternative program models provide an effective alternative to congregate feeding sites. Beside providing flexibility for on-site feeding requirements, how can Congress provide more support to alternative program models like Summer EBT or mobile feeding sites?**

We believe summer EBT is the most promising program model that will efficiently reach kids that face the largest barriers to accessing summer feeding sites. If we could do one thing in reauthorization, we should significantly expand the summer EBT program, especially in rural and other hard to reach areas.

During the school year, the 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 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 communities that are hard to reach and where sites are not available is to provide families with a summer EBT card. 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 model was significantly higher than the percentage of eligible children served through traditional site-based SFSP program, which was nearly 18 percent in 2014.

A mobile feeding program – bringing food closer to kids rather than requiring them to travel, often more than 10 miles, to participate in a summer feeding site – offers the potential to reach children who are simply not able to access a site. However, our rural communities in need are small and far apart and at this point, we have determined a mobile model is cost prohibitive. In Kentucky, we would like to operate a mobile bus that travels to rural towns and delivers food to communities where we know there is great need, before traveling to the next location. If we don't have to set a location for the children to congregate at and wait until all of the children have eaten, then we can reach more kids and distribute more meals, making the program more sustainable. If Congress were to allow this option for non-congregate feeding to be reimbursable, we could operate more programs that have previously been cost-prohibitive. We are still in the child feeding business and will do what we can to reach kids in need. At the same time, non-congregate feeding – whether tied to a mobile feeding model or allowed in other meal delivery models like letting kids take home backpacks with a prescribed number of healthy meals – might still not be sustainable in every community which is why we think summer grocery cards should also be an option for hard to reach areas.

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 complimentary way to allow good nutritious food to reach more children in the summer.

3. **I have heard that programs that encourage parents to visit a summer meals site and share a meal with their child, either for free or for a small fee, have been successful**

for child participation. Have you had experience with programs that have had this option for parents or caretakers? If so, what is your opinion on them?

The Dare to Care Food Bank does not currently have any summer meal sites that provide food for parents to eat with their child. However, we know that the children that are able to attend summer feeding sites are from low-income, food insecure families. 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 reduce their own portion sizes or skip meals to protect children from actual hunger pangs. As a network of food banks, we've seen an increase in households with children that are accessing charitable assistance so we know the need is higher in the summer months. In many cases, parents accompany their children to summer feeding sites. While we have not been able to provide meals to adults at summer feeding sites, we know of food banks and summer feeding sites who have been able to do so, by leveraging private funds to cover the costs of those meals. At Dare to Care, we have been able to provide meals to parents and family members over the age of 18 by using private grants to fund "family cafes." This year we piloted two such sites at a non-profit that provides free housing to low-income single parents that are pursuing higher education. The meals are open to anyone in the community. Many grandparents, aunts and uncles, and neighbors take advantage of this program to eat nutritious meals with their children. Because we use grants to cover the cost of the meals for all ages, the partner sites aren't burdened with keeping track of how many adults are being served, collecting money, purchasing meals from us, or having separate serving lines for children and adults. Our two pilot sites each serve one night a week. In addition to the warm, nutritious meals, they provide activities like budgeting and stranger safety.

Our mission is to lead our community to feed the hungry and conquer the cycle of need. We fulfill this mission through innovative programs like our family cafes and efficient operations that reach people of all ages in all walks of life. We work very hard to ensure summer feeding programs are available to as many children as possible. But we also realize those children are part of a family and those families are part of our community. That is also why we believe other federal nutrition programs, such as SNAP and TEFAP, while not child-specific programs, are critical to ending child hunger. We are committed to making sure no one in our community, adults or children alike, goes hungry.