



October 15, 2008

Mr. Robert M. Eadie  
USDA Food and Nutrition Services  
Fax: 703-305-2879

Thank you for the opportunity to provide comments on the 2009 Child Nutrition/WIC Reauthorization Act. On behalf of registered dietitians and hunger advocates from the great state of Montana, we are asking for the USDA's attention to the following matters.

**Comments for all Child Nutrition Programs fall under 4 main themes:**

1. Strengthen support for ensuring nutrition quality and the delivery of consistent nutrition messages across the programs.
2. Provide adequate funding to ensure nutrition standards and effective nutrition education is able to be implemented.
3. Achieve cost saving through administrative streamlining.
4. Increase access and participation to programs to serve high risk children and families.

**1. Strengthen support for ensuring nutrition quality and the delivery of consistent nutrition messages across the programs.** The Dietary Guidelines are the foundation of all federal food and nutrition program and must be an integral part of the programs. National nutrition standards are needed to ensure consistency between programs and to provide consistent nutrition messages to children, as well as, to ease the task of developing products that meet the standards for the food industry.

School Meals

- Ensure that school meals patterns are aligned with the Dietary Guidelines for Americans within one year of publication of these guidelines.
- Extend nutrition standards to all foods and beverages sold on school campuses through the day.
- Provide USDA with the authority to regulate all food and beverage sales on school campuses.
- Create incentives for switching from juice to fresh, whole fruits and vegetables.
- Authorize USDA to limit the sale of competitive foods in schools.

CACFP and After School Programs

- Improve breastfeeding support. Specifically, we recommend that all breastfeeding and breast milk be considered "creditable" for reimbursement all meal components for infants, or as an entire meal for newborns.
- Keep food-based meal patterns in the program. Such meal patterns are the simplest, most flexible and most easily understood method of meal planning for the center staff.

**2. Provide adequate funding to ensure nutrition standards and effective nutrition education is able to be implemented.** Programs need additional funding to ensure that nutrition standards are met. Funding must be adequate to meet the increased food costs related to serving menus that are consistent with the Dietary Guidelines for Americans. This is a critical need based on USDA studies that confirm the need for further progress in serving high quality nutrition in all child nutrition programs.

#### School Meals

- Provide a higher reimbursement for school meals.
- Allocate commodities for the School Breakfast Program.
- Increase the reimbursement rates for Afterschool Snack Program.
- Increase the rates of reimbursement to meet the rising costs of food.
- Provide the state agencies with the authority and funding to monitor school wellness policy implementation, and provide training and technical assistance to ensure the federal mandate requirements are met.

#### CACFP and After School Programs

- Provide stable funding for nutrition education for School Meals and Child and Adult Care Food Program (CACFP) as a regular part of the state's administrative funding. Eliminate two-year competitive grants for nutrition education for state agencies.
- Provide funding to state agencies to provide training, technical assistance and monitor school wellness policy implementation.

#### WIC

- Support full funding for all potentially eligible WIC participants. Fund WIC at \$16.32 per participant.
- Provide \$30 million in unencumbered funds outside of the regular NSA grant to assure smooth, timely implementation of the science-based changes to the WIC food packages, implement MIS core functions, upgrade and maintain WIC technology systems, achieve program efficiencies and economies, and render systems Electronic Benefit Transfer (EBT) ready.
- Include more funding for the cash-value vouchers for fruits and vegetables.
- Include funding to implement WIC EBT in every state by 2012.
- Increase funding for WIC Breastfeeding Peer Counselors.
- Provide \$150 million to establish a real WIC Contingency Fund.

### **3. Achieve Cost Saving through Administrative Streamlining.**

Rules, paperwork and other requirements in the current programs create undue barriers in state agencies, at the local staff level, as well as at the individual programs themselves. These barriers create disincentives for providers, and thus reduce availability of programs that are vital to infants, toddlers and school aged children.

#### School Meals

- Improve and fund direct certification for schools meals through state data matching systems.

#### CACFP and After School Programs

- Change income eligibility guidelines that require households that receive child support to report it as income, while the households that give child support cannot deduct the amount from their income.

- Reduce the administrative burden for child care centers in the program by elimination of family size and income as the method of determined earned rates of reimbursement for meals at the centers. Use economic data specific to the region and area of the center.
- Remove the tiering system and replaced with one rate of reimbursement per meal type (Breakfast, lunch/dinner, snack) for each child.

**4. Increase access and participation to programs to serve high risk children and families.** Too many children are missing out on the essential nutrition that the programs offer. This is due to lack of a program nearby or in the schools. In other cases, programs fail to reach the children who need them the most.

#### School Meals

- Fund the Elimination of Reduced Price meals category.
- Expand breakfast-for-all programs, especially in schools in lower-income areas.

#### CACFP and After School Programs

- Reduce administrative burden for day care homes and their sponsoring organizations, to encourage more day care providers to join the CACFP.
- Make available supers for school-aged children in afterschool programs in low-income areas, so children receive good nutrition and proper supervision.

Thank you for your consideration of our comments. Please feel free to contact one of us for further clarification.

Sincerely,

Didem Park, RD  
President,  
MDA  
P.O. Box 1197  
Helena, MT 59624  
[zmzmzm@bresnan.net](mailto:zmzmzm@bresnan.net)

Kate Bradford, MA  
Director, Public Policy  
MT Food Bank Network  
5625 Expressway  
Missoula, MT 59808  
[kbradford@mfbn.org](mailto:kbradford@mfbn.org)  
406-721-3825 ext.231

Minkie Medora, MS, RD  
Chair, Food Security Council  
MT Food Bank Network  
5625 Expressway  
Missoula, Mt 59808  
[minkie.medora@gmail.com](mailto:minkie.medora@gmail.com)  
406-241-3581

Cc: The Honorable Brian Schweitzer, State of Montana,  
The Honorable Senator Max Baucus,  
The Honorable Senator Jon Tester,  
The Honorable Congressman Denny Rehberg,  
Joan Miles, Director, Montana Department of Health and Human Services  
Linda McCulloch, Superintendent of Schools, Montana Office of  
Public Instruction