

Mr. Robert M. Eadie
Chief, Policy and Program Development Branch
Child Nutrition Division, FNS, USDA
3101 Park Center Drive, Room 640
Alexandria, Virginia 22302-1594

Dear Mr. Eadie,

Thank you for this opportunity to provide USDA with recommendations for improving the Child and Adult Care Food Program (CACFP) through the 2009 Child Nutrition Programs Reauthorization. CACFP is profoundly important to America's children – both in terms of the number of children it serves and in terms of its positive impact on children. The healthy food, of course, is paramount to meeting the needs of hungry, low-income children for good nutrition. Through in-home visits, group classes, and ongoing assistance and support, CACFP sponsoring organizations and State agencies teach child care providers not just the importance of good nutrition but practical advice and guidance on serving good and nutritious food.

Unfortunately, there are still millions of children in child care who could benefit from CACFP but are currently unserved. Over the last eleven years, there has been a 27 percent drop in the number of CACFP sponsoring organizations and in the number of family child care homes participating in CACFP. A well-conceived reauthorization bill, focused on the right program improvements for CACFP, can help to reduce hunger, reduce childhood overweight and obesity, improve child nutrition and health, and enhance child development and school readiness.

The following recommendations would help to improve program access and nutrition quality and protect the quality of CACFP services for children in child care.

- **Streamline Access for Eligible Low-Income Children**
- **Enhance Meal Reimbursements**
- **Improve CACFP's Ability to Reach Low-income Families by Streamlining Program and Paperwork Requirements**
- **Improve the Nutritional Value of the Meals and Snacks Served**
- **Strengthen the Support System**

Streamline Access for Eligible Low-Income Children:

- Reduce the area eligibility threshold in family child care and at-risk programs from 50 percent to 40 percent.
- Reduce paperwork by extending CACFP categorical eligibility to children in family child care participating in other means-tested federally funded programs supporting working families.
- Establish area eligibility for child care centers.

Enhance Meal Reimbursements:

- Dramatically revise or eliminate the burdensome CACFP tiering system for children in family child care homes and thereby open up access.
- Increase CACFP reimbursements to reflect the increased costs of meeting the Dietary Guidelines.
- Allow CACFP to offer the option of a third meal, (typically this would be supper) for children in child care, as the program used to do.
- Provide suppers for at-risk afterschool programs.

Improve CACFP's Ability to Reach Low-income Families by Streamlining Program and Paperwork Requirements: (Non-Cost Proposals)

- Streamline program operations, increase flexibility, and maximize technology and innovation to allow sponsoring organizations and providers to operate most effectively.
- Direct the Secretary to reduce paperwork by eliminating ineffective and poorly targeted requirements including “block claiming.”
- Allow CACFP sponsoring organizations to plan multi-year administrative budgets using carryover funds, to keep their earned administrative reimbursement using a “homes multiplied by rates” system, and to have advance funds when necessary.
- Allow CACFP family child care providers to facilitate the return of participating children's family income form.
- Eliminate a barrier to participation by allowing the use of the last four digits of the social security number.
- Continue USDA Paperwork Reduction Initiative.

Improve the Nutritional Value of the Meals and Snacks Served:

- Direct the Secretary of Agriculture to issue proposed regulations updating the CACFP meal pattern, including recommendations for the reimbursements necessary to cover the costs of the new meal pattern, within 18 months of the publication of the IOM CACFP Meal Pattern report.

Strengthen the Support System:

- Increase the sponsors' administrative reimbursement rate to the level necessary to:
 - provide quality nutrition education,
 - cover the transportation costs of serving family child care homes in rural areas, and

- cover the costs of additional visits, and time spent in helping low-income providers overcome literacy and language issues.
- Fully fund USDA FNS child nutrition functions to restore adequate staffing levels for the child nutrition programs at the national and regional level.

We appreciate this opportunity to share our recommendations for the upcoming 2009 reauthorization.

Sincerely,

Afterschool Alliance
 Alliance for Children and Families
 American Federation of State, County and Municipal Employees
 American Federation of Teachers
 Center for Law and Social Policy
 Cherokee Nation
 Child Care Law Center
 Coalition on Human Needs
 Early Care and Education Consortium
 Early Childhood Policy Research
 First Children's Finance
 First Five Years Fund
 Food Research and Action Center
 Half in Ten
 IFF
 Insight Center for Community Economic Development
 Local Initiatives Support Corporation
 Low Income Investment Fund
 National AfterSchool Association
 National Association for Family Child Care
 National Association for the Education of Young Children
 National Association of Child Care Resource and Referral Agencies
 National Black Child Development Institute
 National Council of La Raza
 National Organization for Women
 National Women's Law Center
 Nonprofit Finance Fund
 Opportunity Finance Network
 Pre-K Now
 RESULTS
 Service Employees International Union
 United Neighborhood Centers of America
 Women Work! The National Network for Women's Employment

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