

June 18, 2004

Senator Thad Cochran, Chair
Senator Tom Harkin, Ranking Member
Senate Agriculture, Nutrition &
Forestry Committee
328-A Russell Senate Office Building
United States Senate
Washington, DC 20510

Representative John Boehner, Chair
Representative George Miller, Ranking Member
House Education and the Workforce
Committee
2181 Rayburn House Office Building
United States House of Representatives
Washington, DC 20515

Dear Chairman Cochran, Ranking Member Harkin, Chairman Boehner and Ranking Member Miller:

As organizations committed to improving the nutrition, health, education and welfare of our nation's children, we wish to extend our sincere appreciation for all your efforts in developing the child nutrition reauthorization legislation. While we wish that more funds had been available in the budget to take more steps forward, we are pleased that the legislation includes many of our joint priorities, including: permanent authorization of the eligibility of for-profit child care centers for the Child and Adult Care Food Program (CACFP) if 25 percent of children are eligible for free or reduced price meals; the exclusion of privatized military housing from income when determining eligibility for school meals; and the extension and expansion of the popular "Lugar summer food pilots" to additional states as well as to non-profit sponsors.

In addition to program improvements in the House bill (H.R. 3873), we are also pleased that the Senate bill (S. 2507) includes: mandatory direct certification phase-in for food stamp households applying for free or reduced price meals; a CACFP pilot which expands area eligibility for family child care in rural areas; a three-year summer food rural transportation pilot; continuation and expansion of the current fresh fruit and vegetable pilots with special emphasis on serving children in low-income areas; and the potential for pilot projects to offer free meals to households with incomes up to 185 percent of poverty.

We would also like to take this opportunity to share our thoughts on the two major unresolved issues:

- 1) WIC-Only store cost containment and
- 2) School wellness policies and science-based recommendations on foods offered at schools.

WIC-Only Store Cost Containment

The 2004 Child Nutrition reauthorization provides an opportunity for Congress to update the WIC vendor management cost containment rules to account for the growing reach of a relatively new type of vendor, the WIC-Only store. We are concerned by reports detailing a significant increase in WIC food costs as a result of the higher prices charged by many WIC-Only stores. In a recent New York Times article, *Selling to Poor, Stores Bill U.S. for Top Prices*, Eric M. Bost, Under Secretary for Food, Nutrition and Consumer Services USDA, highlighted cost concerns, explaining that an analysis of food costs in California and Texas shows "W.I.C.-only stores in these states have higher prices, on average, than other authorized retailers." In addition to the over 600 WIC-Only stores in California and 102 WIC-Only stores in Texas, there has been a growing trend in other states, with 86 stores in Florida, 43 in Arkansas, 25 in North Carolina, 8 in Oklahoma, 6 in Virginia, and 4 in Alabama. The cumulative

effect of these higher prices has been to raise the cost of WIC by millions of dollars each month. Ultimately, this could lead to reduced caseloads, costing nutritionally at-risk women, infants, and children their opportunity to participate in the WIC program.

The growth of the WIC-Only sector has been fueled in part by the stores' popularity among WIC clients. These for-profit stores, which serve only WIC clients, are often convenient and provide a client-friendly environment with bilingual staff. While acknowledging the strengths of this type of vendor, we believe that Congress must include language in the reauthorization assuring that WIC-Only store prices are brought in line with those of similar retail stores.

We believe that vendor provisions in the 2004 Child Nutrition reauthorization should empower State WIC Agencies to bring balance back to their cost containment systems through effective management of WIC-Only store prices. For-profit WIC-Only stores need to be identified and defined in the provision. WIC-Only stores should be grouped fairly and appropriately. Finally, provision language should assure that WIC-Only store prices are not higher than market-driven competitive retail grocery store prices. The provisions contained in the Senate bill addressing these price and grouping goals are a constructive approach.

School Wellness Policies and Science-Based Recommendations

We believe that the local school wellness policy provisions in the House bill provide a very constructive approach for enlisting the assistance of school districts in childhood obesity prevention. These provisions will cause school districts to work together with their communities, many for the very first time, to develop policies on nutrition education, physical activity programs, and the kinds of foods they offer to students. This is especially important in light of the deep concern on the part of the health community, the Administration, and parents themselves about the growing obesity epidemic in this nation.

In addition, one very useful tool to help local school districts develop and evaluate school wellness policies on foods offered to students would be the availability of objective science-based recommendations. Recommendations developed by an external, independent scientific body could be of great assistance to local schools in developing their own policies. We urge you to include the development of these recommendations in the final bill in order to provide school districts with the best quality advice possible to take into account in making their decisions about local school wellness policies.

We look forward to continuing to work with you and your staff in any way we can to assure the speedy passage and implementation of the 2004 Child Nutrition reauthorization.

Sincerely,

American Association of School Administrators
American Commodity Distribution Association
American Diabetes Association
American Dietetic Association
American Federation of State, County, and Municipal Employees (AFSCME)

American School Food Service Association (ASFSA)
America's Second Harvest
Anti Hunger Action Committee
Association of Farmworker Opportunity Programs
Bread for the World
Catholic Charities USA
Central Coast Hunger Coalition
Chicago Jobs Council
Children's Defense Fund
Children's Foundation
Coalition of Labor Union Women
Coalition of Religious Communities, Utah
Coalition on Human Needs
Colorado Anti-Hunger Network
Colorado Center on Law and Policy
Community Food Security Coalition
Congressional Hunger Center
Connecticut Association for Human Services
Crossroads Urban Center, Utah
Denver Urban Ministries
EBT Industry Council of the Electronic Funds Transfer Association
Evangelical Lutheran Church in America
Food and Allied Service Trades Department (FAST), AFL-CIO
Food Research and Action Center (FRAC)
FOOD Share, Inc.
Greater Upstate Law Project, NY
Green Consulting Services, Miami, FL
Homeless Garden Project, Santa Cruz, CA
Hudson Valley Poverty Law Center, NY
Human Services Coalition of Dade County
Hunger Action Network of New York State
I Am Your Child Foundation
Indiana Coalition on Housing and Homeless Issues, Inc
Institute Justice Team, Sisters of Mercy of the Americas
Jewish Council for Public Affairs
Just Harvest, Pittsburgh, PA
Lutheran Advocacy Ministry – Colorado
Lutheran Public Policy Office of Washington
Migrant Legal Action Program
Monterey County Farm to School Partnership
National Advocacy Center of the Sisters of the Good Shepherd
National Association for the Education of Young Children (NAEYC)
National Association of Protection and Advocacy Systems
National Association of State Boards of Education
National Coalition for the Homeless

National Council of Churches of Christ in the USA.

National Council of Jewish Women

National Council of La Raza

National Farmers Union

National Grange

National Head Start Association

National Organization for Women

National Priorities Project

National PTA

National Student Campaign Against Hunger and Homelessness

National WIC Association (NWA)

National Women's Law Center

Northeast Missouri Client Council for Human Needs, Inc.

Presbyterian Church (U.S.A.) Washington Office

Public Children Services Association of Ohio

Public Interest Law Office of Rochester, NY

Public Justice Center

RESULTS

Sargent Shriver National Center on Poverty Law

Second Harvest Food Bank of Santa Cruz and San Benito Counties

Share Our Strength (SOS)

The Advocacy for the Poor, Inc., Winston-Salem, NC

The Partnership Center, Ltd.

Union for Reform Judaism

United Food and Commercial Workers International Union (UFCW)

United Fresh Fruit & Vegetable Association

WHEAT, Phoenix, AZ

Women of Reform Judaism

World Hunger Year