



THE CITY OF NEW YORK
OFFICE OF THE MAYOR
NEW YORK, NY 10007

July 13, 2010

The Honorable George Miller
Chairman
House Committee on Education and Labor
2181 Rayburn House Office Building
Washington, DC 20515

The Honorable John Kline
Ranking Member
House Committee on Education and Labor
2181 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Miller and Ranking Member Kline:

As you prepare to take legislative action on the Improving Nutrition for America's Children Act, we applaud your leadership and hard work to craft a bill to improve the health and welfare of our nation's children. We also ask for your support of provisions that are of particular concern as we seek to make nutritious and affordable meals available to more than one million children in New York City's public schools.

We specifically commend many elements of the bill, including:

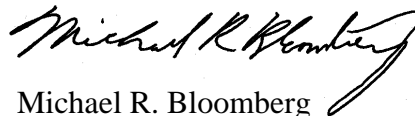
- **Improving methods of eligibility certification and reimbursement.** We support efforts to use Medicaid data to directly certify eligible students. Under your version of the bill, many more eligible children may receive free meals and bypass the difficult paper application process.
- **Expanding participation in classroom breakfast.** We support provisions to increase access to healthy school breakfasts. New York City has experimented with serving breakfast in the classroom, and these initiatives have been very successful. An increase in funding to support such initiatives will be instrumental in helping our children achieve educational success.
- **Raising nutritional standards for foods provided in schools.** We support raising the current nutritional standards for school nutrition programs. New York City has successfully developed citywide standards that could serve as a national model. It is imperative, moreover, that any new federal standards serve as minimum health standards and not prevent localities from imposing or maintaining stricter standards. We also strongly support provisions in the bill that would make all foods available during the school day subject to federal nutrition standards.

At the same time, we believe that it is essential that the bill minimally match President Obama's request of \$10 billion for child nutrition and ask you to support the following:

- **Increasing school lunch reimbursement rates.** Given that implementation of the Institute of Medicine standards for school meals mandated by your bill will conservatively cost ten cents per meal, the provisions of the bill providing a six cent increase in school lunch reimbursement actually amount to at least a four cent per meal cut in school lunch reimbursement. Accordingly, in order to cover the costs of procurement and preparation of healthier meals, New York City supports an across-the-board increase of school lunch reimbursement rates by a minimum of ten cents.
- **Raising income threshold for “free” meals.** We ask you to work towards increasing the income threshold for “free” meals to at least 185 percent of the poverty line. In addition to aiding low-income families, this would ease administrative burdens and simplify expansion of direct certification. We urge the Committee to examine what cost savings could be achieved by altering the “free” and “reduced” categories and request that such savings be directed toward raising the income threshold for “free” meals.
- **Authorizing use of statistically based certification and reimbursement claims.** Schools and school districts should be able to apply for Universal School Meals based on estimates of eligible rates that can be derived from the Census Bureau, the IRS, or Medicaid. Under the proposed legislation, however, most of the potentially eligible New York City schools would receive lower reimbursements using the proposed “multiplier” than they currently receive using the inefficient paper applications. New York City requests a multiplier of 1.7 for the initial phase-in and a range of 1.3–1.7 for the full implementation.

We look forward to working with you to produce a bill that will promote healthier school environments for New York City and the rest of the country. Thank you for your time and consideration.

Sincerely,



Michael R. Bloomberg
Mayor

cc: Representative Carolyn McCarthy
Representative Yvette Clarke
Representative Tim Bishop
Representative Paul Tonko