



2023 Legislative Issue Paper

The American Commodity Distribution Association (ACDA) is a non-profit professional association, whose members include state agencies that distribute USDA Foods; agricultural organizations; recipient agencies, such as schools; industry groups, such as food manufacturers and processors; and allied and agriculture organizations, such as nonprofit anti-hunger groups and growers' associations. ACDA strongly supports the USDA Foods Program and the multiple individual programs to which these foods are provided. In FY 2022, ACDA members assisted in the distribution of nearly 2.4 billion pounds of domestically produced commodities valued at more than \$3.3 billion to programs including the National School Lunch and Breakfast Programs, the Emergency Food Assistance Program, the Summer Food Service Program, the Commodity Supplemental Food Program, and the Child and Adult Care Food Program.

ACDA continues to support efforts to provide universal eligibility for the National School Lunch and Breakfast Programs. We also maintain our opposition to converting these programs to block grants which do not have the ability to respond to changing conditions. We have specific recommendations for child nutrition and household programs which follow.

Child Nutrition Programs

As Congress undertakes reauthorization of Child Nutrition Programs, and programs transition back to normal operations, pandemic related challenges are likely to extend into the next school year. Given this, it is vital to maintain flexibility in these programs including opposing block grants. Congress should:

- **Maximize existing USDA Foods entitlement.** Use the higher of current operations or school year 2018-2019 as the base period for the determination of commodity entitlement to protect school districts where operations have not returned to normal
- **Strengthen the important role of USDA Foods in the school meal programs.** USDA Foods have a dual role – supporting the domestic agricultural economy while providing nutritious food to school children.
 - Provide a 6¢ entitlement for USDA Foods for every breakfast served
 - Ensure that 12% of school lunch support comes in the form of commodities
 - Align the Fruit and Vegetable Snack Program with school meals by requiring the Buy American provision.
 - Increase the Summer Food Service Program Commodity Rate currently set at 1.5 cents per meal.

- **Create responsive program administration**
 - Publish the per meal commodity rate for the upcoming school year by February 15th.
 - Provide a dedicated resource in the State Administrative Formula (SAE) for the state distribution of USDA Foods.
 - Solicit a study on the impact of fees on USDA Foods utilization in the National School Lunch Program.
 - Support rural and remote schools by soliciting a study on the challenges they face including the absence of distributors, the complexity of deliveries and the smaller scale.

Household Programs

Congress is expected to take up both the Farm Bill and FY 2024 Appropriation action that is important for household programs.

- **The Emergency Food Assistance Program (TEFAP) provides USDA Foods to food banks, food pantries and soup kitchens. To meet the growing need for emergency hunger relief, Congress should provide robust resources including:**
 - Continue enhanced funding for USDA Foods.
 - Ensure administrative expense allowances keep up with inflation.
 - Eliminate the state matching requirement 7 CFR 251.9 allowing States the needed resources to provide strong program oversight.
- **The Commodity Supplemental Program (CSFP) provides a nutritious monthly USDA Foods food box to vulnerable older adults.**
 - Raise the gross income eligibility threshold from 130% of the poverty line to 185% to align with TEFAP in many states.
 - Lower the CSFP eligibility age to 55 to make an earlier investment in preventing the onset of significant medical issues among older individuals.