

URGENT!

FEDERAL CITY REPORTER



TO: The Mayor

FROM: John J. Gunther
Executive Director *John Gunther*

DATE: December 23, 1981

SUBJECT: The Summer Food Program

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CAMBRIDGE, MASS.

The U.S. Department of Agriculture has published proposed regulations that have the potential of eliminating a significant number of sites from the Summer Food Program in cities across the country. Congress enacted changes in the program in the Reconciliation Bill when it eliminated all private sponsors and put restrictions on public sponsors. In 1980 the program had 345 governmental sponsors, primarily city and county governments. It is generally felt that the proposed regulations (Federal Register, Friday, December 11, 1981, page 60592, Section 225.18) go considerably beyond the intent of Congress in restricting the program. Indeed there is bi-partisan concern on the Hill regarding this issue.

The regulations require that public sponsors have "immediate control over sites" and establish three additional criteria which public sponsors must meet:

- ~~o~~ public sponsors must retain authority for managing staffs who run the program;
- o public sponsors can operate only sites which are properties or facilities under the year-round auspices or control of the local government. Documentation of control, including lease or rental agreements, must be attached to the application;
- o public sponsors must submit information which documents an on-going, year-round relationship between the sponsor and the site to indicate direct control by the sponsor.

The requirement that all three criteria be met will eliminate many sites from the program. One city, for example, which has administered the program for the past twelve summers through its parks and recreation department has 108 sites. Twenty-three are parks and recreation sites directly operated by the city; 41 are recreation sites owned by churches and civic associations, and 44 are school sites. The 41 church and civic association sites would not qualify because the city does not own or lease them; the school sites would not qualify because the school system is independently run in that city. Hence, only the 23 city-owned sites would qualify and it is likely that the program would have to be drastically cut back, and fewer children would receive meals.

It is crucial that you comment on these regulations and make the U.S. Department of Agriculture aware of the impact they could have on your city. The comment period has been extended to January 11, 1981. Write to:

Jordan Benderly, Director
Child Care & Summer Programs Division
Food and Nutrition Service
U.S. Department of Agriculture
Alexandria, Virginia 22302

p. 5-12
Comm. from Paul E. Healy, City Clerk, transmitting comm. from John J. Gunther, Executive Director, Federal City Reporter, re: proposed cuts by the Dept. of Agriculture in the Summer Food Program.

In City Council,

January 11, 1982

1/11/82
- Placed on File -