



Los Angeles Office
205 S. Broadway, Suite 205
Los Angeles, CA 90012

Jeanine Townsend
Clerk to the Board State Water Resources Control Board
1001 I Street, 24th Floor Sacramento, CA 9581

Re: Comment Letter – Drinking Water for Schools Grant Program Funding Guidelines

Dear Ms. Townsend and State Water Resource Control Board

California Food Policy Advocates (CFPA) commends the State Water Resource Control Board for their efforts to improve the health and wellbeing of children by enhancing water access in California schools. Thank you for the opportunity to comment on the proposed funding guidelines for the Drinking Water for Schools Grant Program.

CPFA is a statewide, policy and advocacy organization dedicated to improving the health and well-being of low-income Californians by increasing their access to nutritious, affordable food. We envision a healthy and food-secure California where all Californians have the physical, social and economic access to the foods necessary for a nutritious diet including access to healthy beverages, like water.

We respectfully submit the following remarks to inform the funding guidelines.

Funding Prioritization

We urge the State Water Board to prioritize funding for schools that serve a high percent of students eligible to receive free and reduced-priced school meals following the initial 9-month funding solicitation by small disadvantaged communities. Criteria should be mentioned in the funding guidelines and should prioritize schools with impaired water access that meet the Community Eligibility provision¹ or high-poverty schools serving at least 75% of their students through the National School Lunch and Breakfast program. Additional consideration for funding should also include school sites that are not currently complying with state and federal drinking water requirements related to SB 1413 and Section 203 of the Healthy Hunger-Free Kids Act.

Project Effectiveness

The Board should clearly define how it will measure project efficacy in the guidelines. We encourage the Board to make the criteria available and public before the final adoption. Consider using the School Drinking Water Needs Assessment Checklist and Planning Guide to inform the final criteria selected. Additional measures that could be used to evaluate applications should include:

- Consideration of the actual placement of the water access points themselves— e.g., ensuring the access points are placed in such a way as to maximize water accessibility for the student population.
- The impact of water intervention on population served, including districts with schools that have high rates of participation in the School Lunch program, or districts in which a large percentage of the schools serve DACs

¹ See *The Healthy, Hunger Free Kids Act* , Public Law 111-296; December 13, 2010

Drinking Water for Schools Funding Application

As the final guidelines are adopted, we encourage the Board to include a section in the funding application that documents the impact and reach new water access projects will have on students that participate in the Federal School Meal Programs. Participation data is available online and released by the California Department of Education. Research shows that most children and adolescents do not consume enough water. Even mild dehydration can lead to significant impairments in cognitive function. Water supplementation has been proved to improve students' classroom focus and academic performance.

Demonstrating Impaired Water Access

Many school communities have conducted student and parent-led surveys to identify and evaluate water needs. Consider using these findings to show impaired water access for eligible entities seeking funds. Tools developed by Harvard School of Public Health, University of California San Francisco, and California Food Policy Advocates can be used to support funding applications by eligible entities. The tools include:

- Parent Making Waves Evaluation Tool: Drinking Water Inventory
- Harvard: Water Audit Tool

Document and Publish the existing need for Water Access Funding

Funding for the Water in Schools Grant program is limited and will only go so far. We encourage the Board to make public the number of request for funding it receives and the amounts required by eligible entities to address water access issues. At a minimum make the following information public:

- name of the school district and school name(s);
- name(s) of the public water system serving the school(s), county;
- whether the project is located or not located in a disadvantaged community;
- school zip code, school population, a summary of the funded project;
- estimated impact/reach of new water access point/intervention;
- the percentage of children that are the federal lunch program (e.g. free and reduced price meals);
- The types of contamination being treated through filtration (if any).

This information can help advocates and parent groups' pursue additional resources through the legislature and future budget renegotiations. Let's ensure that every child has access to safe and contaminant free water in California schools. Thank you for the opportunity to submit public comments. CFPA looks forward to working with the Board and others to support and publicize the program once the guidelines and applications processes are adopted.

Sincerely,



Hector Gutierrez
Nutrition Policy Advocate
California Food Policy Advocates