

SNEB address

DATE

Tina Namian  
Branch Chief, Policy and Program Development Division  
Child Nutrition Programs  
Food and Nutrition Service  
U.S. Department of Agriculture  
3101 Park Center Drive, Room 1206  
Alexandria, VA 22302

Docket ID: FNS-2011-0029

Re: Child and Adult Care Food Program: Meal Pattern Revisions Related to Healthy Hunger-Free Kids Act of 2010

Dear Ms. Namian:

The Society for Nutrition Education and Behavior (SNEB) strongly supports the U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS) proposed rule entitled Child and Adult Care Food Program: Meal Pattern Revisions Related to Healthy, Hunger-Free Kids Act of 2010, and respectfully submits the following comments for your consideration.

SNEB represents the unique professional interests of nutrition educators in the United States and worldwide. SNEB is dedicated to promoting effective nutrition education and healthy behavior through research, policy, and practice with a vision of healthy communities, food systems, and behaviors. Many SNEB members work in schools, with students and parents on nutrition education and promotion efforts, and as school food service professionals preparing and serving healthy meals.

We are delighted that the Healthy, Hunger-Free Kids Act included a focus on improving nutrition and physical activity for young children including revisions to the Child and Adult Care Food Program (CACFP) and applaud USDA for making the first major update of the CACFP nutrition standards since the program's inception in 1968. The strengthening of nutrition standards for the CACFP meals and snacks, paired with funding for training, technical assistance, and tools to assist early care and education (ECE) providers in complying with the new standards and promoting wellness among young children, is a major step forward in addressing the health needs of our youngest, and often most vulnerable, children. Updating the nutrition standards for CACFP will ensure improved dietary intake and the long-term health of millions of children across the country.

It is clear that in developing this proposed rule, USDA carefully considered expert recommendations, existing models, state, local, and industry standards, and the practical application of the standards—including costs for providers.

We strongly support nutrition improvements for the CACFP program, including the following:

- Supporting breastfeeding by supporting mothers who breastfeed on-site;
- Requiring a fruit or vegetable be serve as part of the snack meal pattern for children 6 to 11 months old and serving both fruits and vegetables to older children;
- Limiting juice to 100% fruit/vegetable and no more than one age appropriate serving per day;
- Providing more whole grain products and not counting grain-based desserts as the grain meal component;
- Setting strong limits for sugars in breakfast cereals (to the levels in USDA’s Women, Infants and Children’s program);
- Only allowing unflavored milk for children 2-5 years old, setting sugar limits for any flavored milk served to older children, and limiting sugars in yogurt;
- Including a best practice around family-style dining;
- Making drinking water available to children throughout the day;
- Providing adequate, age-appropriate physical activity opportunities for young children;
- Ensuring no sugar-sweetened beverages are served in child care facilities; and
- Providing adequate technical assistance and training, especially in relation to flavored milk, yogurt, whole grains, physical activity, sugar-sweetened beverages, accessible drinking water, and family-style eating

SNEB recognizes that adults comprise a significantly smaller proportion of CACFP participants as compared to infants and children. However, it remains a critical program serving 120,000 participants at eligible adult non-residential day care facilities. As such, the final rule should support the unique dietary needs of adults and in particular, older adults, while continuing to provide access to and encourage consumption of a greater variety of nutritious foods. Recognizing that many older adults as well as those individuals who are deemed functionally impaired often require specific diets, the CACFP final rule should take remain flexible in allowing adult day care centers to meet these needs.

In closing, we commend USDA for developing this much-needed update to the nutrition standards for the Child and Adult Care Food Program, and we encourage the agency to act expeditiously to finalize and fully implement a strong final rule. We urge USDA to build on its proposal and strengthen it to ensure that strong, feasible nutrition standards are put in place to help safeguard and support the health of CACFP participants.

Respectfully,