

July 31, 2019

Andrea Farmer  
Chief, Community Meals Branch  
Policy and Program Development Division  
USDA Food and Nutrition Service  
3101 Park Center Drive  
Alexandria, Virginia 22302

RE: Docket ID: FNS-2019-0005

Dear Ms. Farmer:

Thank you for the opportunity to provide comments on the proposed rule *Delayed Implementation of Grains and Ounce Equivalents in the Child and Adult Care Food Program*, 84 Fed. Reg. 126 (July 1, 2019).

The Food Research and Action Center (FRAC) is the leading national nonprofit organization working to eradicate poverty-related hunger and undernutrition in the United States. We provide coordination, training, technical assistance, and support on nutrition and anti-poverty issues to a nationwide network of advocates, service providers, food banks, program administrators and participants, and policymakers.

FRAC commends USDA for issuing this rule. This proposed action is consistent with USDA's efforts to provide excellent customer service while working with State and local partners to ensure high quality, nutritious meals for children and adult participants in CACFP.

FRAC supports USDA's proposed action to delay the implementation of ounce equivalents from October 1, 2019 to October 1, 2021. This delay will allow USDA to publish important training material and consider future plans.

During this delay, FRAC respectfully requests that USDA issue regulations eliminating the requirement to use ounce equivalents in CACFP. Instead, allow school-based programs seeking consistency with the school meal rules the option to use ounce equivalents in CACFP. While we understand that this effort was intended to make the program consistent with National School Lunch and Breakfast program rules, the same outcome can be attained by allowing school-based programs using CACFP the option to implement ounce equivalents. Public school systems have teams of food service staff with the dedicated time and skill level to successfully implement ounce equivalents but child care centers, family child care homes and community-based afterschool programs do not.

USDA can use the time during the proposed delay to analyze the impact of requiring all CACFP program operators to switch to using ounce equivalents and determine if the added complexity significantly improves child nutrition to a level that justifies the highly complicated concept. The current system of crediting grains, using readily understandable servings sizes such as cups of cereal or slices of bread, works well for CACFP. Moving to a system that requires ounce equivalents for grains will unnecessarily complicate the meal pattern, without offering any additional nutrition safeguards to the program. Utilizing the technical measurements from the Dietary Guidelines for Americans is unnecessary and inconsistent with the design and intent of the new healthier CACFP meal pattern.

We appreciate USDA's continued commitment to responsive engagement and intelligent problem solving throughout the CACFP meal pattern implementation process. We recognize the diligence and hard work of USDA staff.

Sincerely,

Geraldine Henchy, MPH, RD  
Director of Nutrition Policy and Early Childhood Nutrition Programs  
Food Research and Action Center