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Initiative for Children INC.  
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April 15, 2015

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Docket Number: FNS-2011-0029

Dear Ms. Namian:

Thank you for the opportunity to comment on the Child and Adult Care Food Program (CACFP) proposed rule (FNS-2011-0029) aiming to improve health and nutrition by revising the current meal patterns. Because the program has not had a substantial revision since its inception in 1968, these revisions accomplish much on behalf of the health of young children. Thank you for reviewing the meal patterns and aligning them with the most recent scientific evidence.

The Bessie Tartt Wilson Initiative for Children (BTWIC) is a non-profit organization driving systems change in early education and care that leads to greater quality and access for children in Massachusetts, particularly underserved children. Toward that end, we engage providers and other stakeholders in grassroots research that highlights systemic barriers to greater quality and access. We then lift up solutions that are anchored in the experience of educators, parents and other stakeholders to remove those barriers.

Over the last two years, BTWIC has conducted research in Massachusetts to identify challenges and recommend solutions for increasing participation in CACFP. We have conducted focus groups, interviews, surveys, and convened providers through regional forums, engaging over 600 early educators and providers across the state.

April 15, 2015

We are appreciative of the opportunity to provide feedback on the proposed rule released in January. We applaud the focus on more up-to-date nutrition guidelines and the sensitivity to any potential cost implications. We would however encourage the USDA to advocate for the children served by CACFP by pressuring Congress to re-assess and increase reimbursements rates. It is our opinion that the nutritional guidelines should be devised because they are what is best for young children, not simply because they fit within a budget-neutral constraint. Additionally, it is not clear whether the cost savings brought about from disallowing grain-based desserts will actually result in a savings for CACFP providers. We strongly urge the USDA to re-evaluate this component of its cost savings analysis.

We applaud the emphasis on more fruit and vegetables as well as more whole grains. Given what we know about the increase of sugar in children's diets and the negative health consequences, we favor options that prohibit flavored milk for any age group and limit the amount of sugar in yogurt. There is no nutritional benefit to additional sugar in children's diets.

As required by Healthy, Hunger-Free Kids Act of 2010 (HHFKA), the USDA is responsible for providing technical assistance to early education and care programs and providers. We encourage the USDA to dedicate new staff members to help with coaching and technical assistance for the implementation of the new guidelines. The development of materials and training resources is not enough to help early education and care providers understand and adapt to the guidelines. We also strongly encourage the USDA to develop measures of accountability for state administrators for CACFP outreach, to ensure that providers and programs know that the program exists.

Finally, we encourage the USDA to review the rationale and implementation strategy for point-of-service recording, as you explore cost-saving opportunities for early education and care providers.

Thank you for this opportunity to share our support for the proposed rule.

Sincerely,



Marie St. Fleur  
President and CEO



Kira Taj  
Senior Research Associate