



March 22, 2023

Tina Namian, Director  
School Meals Policy Division  
4th floor, Food and Nutrition Service  
1320 Braddock Place  
Alexandria, VA 22314

Dear Ms. Namian,

This letter addressing the cost estimate and administrative burden with regard to terminology changes is in addition to National CACFP Sponsors Association's (NCA) previous comment to USDA on the proposed rule (*USDA Request for Comment on Child Nutrition Programs: Revisions to Meal Patterns Consistent With the 2020 Dietary Guidelines for Americans: FNS-2022-0043-0001*) which fully outlines our position on the line items that pertain to Child and Adult Care Food Program (CACFP) (<https://www.regulations.gov/comment/FNS-2022-0043-73724>).

The cost estimates provided in the proposed rules largely address those expected to be endured by schools. No cost estimates were given regarding the cost to the CACFP community with regard to the proposed terminology changes. In particular, the proposed terminology change from meat/meat alternate to protein sources, while seemingly insignificant, would create a substantial financial and administrative burden on CACFP stakeholders.

Furthermore, making this change in the CACFP and not in the SFSP will create an unnecessary administrative and financial burden for sponsors and operators who operate both programs.

#### **Estimated Costs and Administrative Burden**

When USDA estimates the true cost and administrative burden of these proposed rule changes for the CACFP community, we recommend you consider the following:

##### **For CACFP sponsoring organizations:**

- The cost of updating their websites with new resources.
- The cost of downloading, printing and distributing the materials to providers.
- The cost of training providers both virtually and in person.
- The cost of additional technical assistance.
- The cost of translation.
- The cost of collecting new CN labels, and revising standardized recipes and menus.
- The decreased income for disallowed meals for center sponsors.
- The cost and risk of increased corrective action plans.

##### **For CACFP providers:**

- The cost of updating their websites with new resources.
- The cost of downloading and printing resources.
- The decreased income for disallowed meals.
- The cost and risk of having findings.
- The cost of collecting new CN labels, and revising standardized recipes and menus.

**For State Agencies:**

- The cost of updating their websites with new resources.
- The cost of downloading, printing and distributing the materials to providers and sponsors.
- The cost of training providers and sponsors both virtually and in person.
- The cost of additional technical assistance.
- The cost of translation.
- The decreased income for disallowed meals.

**For Industry serving CACFP:**

- The cost of updating claims software systems.
- The cost of updating software for menu and recipe systems.
- The cost of revising and applying for new CN Labels.
- The cost of developing new Product Formulation Statements.
- The cost of updating their website with new resources.
- The cost of updating their own nutrition education materials.
- The cost of updating menus and recipes.

**For nonprofit organizations which support the CACFP community:**

- The staff time for making the terminology changes to all core pdf training materials (such as meal pattern cards, nutrition training resources, best practices resources, menus, and recipes.)
- The cost of printing and distributing resources.
- The cost of revising/conducting/hosting online training.
- The cost of additional technical assistance.
- The cost of updating their websites with new resources.

While it is extremely difficult to estimate the true costs and administrative burden of these changes in the time available in the comment period, we know that the costs would be extraordinary across the entire community; over 25 million dollars for CACFP Sponsoring organizations, alone.

NCA asks the USDA to consider whether the costs of these terminology changes are a worthy ask of a community that is already struggling to stay in business amidst the expiration of flexibilities, diminished reimbursement, and increased food costs.

Thank you again for the chance to provide additional feedback and insight.

We remain available, at your service and convenience, to provide feedback, insight, and impact of any USDA action.

Sincerely yours,



Lisa Mack  
President & CEO



Blake Stanford  
Board Chair