



A National Platform for the Child and Adult Care Food Program Community.

February 6, 2018

Angela Kline, Director
Policy and Program Development
Child Nutrition Programs FNS, USDA
P.O. Box 66740
Saint Louis, MO 63166-6740

RE: Docket ID FNS- 82 FR 58792 Food Crediting in Child Nutrition Programs:
Request for Information

Dear Ms. Kline,

The National CACFP Sponsors Association (NCA) thanks you for the opportunity to provide comments on food crediting in Child Nutrition Programs (CNPs), specifically the Child and Adult Care Food Program (CACFP), the At-Risk Afterschool component, the Summer Food Service Program (SFSP), Head Start, and Tribal Nation programs.

As sponsors, we witness firsthand the positive difference our programs make, not only to the nutritional health of children, but the quality of their child care overall. We understand the need to ensure the very best nutrition for the children in our program and bolster program integrity. We urge USDA to avoid creating additional burdens in program complexity, such as an increased paperwork which could result in lost meal reimbursements for child care providers.

Our programs differ greatly from the National School Lunch Program, therefore we are not addressing any comments in that area. The children in our care, infants through age 18, are provided care in centers and homes that do not have a registered dietitian on staff. Most child care facilities operate on a limited budget with limited support staff. Therefore, our consensus from our member survey is to keep crediting as simple and consistent as possible.

Child care homes normally have one caregiver and often serve low income families. Many of our providers are below the income guidelines themselves. Any additional changes to the crediting process will undoubtedly create a barrier to participation and continued reduction in participation. If our child care providers do not participate, we have no access to serve this vulnerable population.

We wish to continue to uphold the CACFP as an indicator of exceptional quality childcare and offer the following considerations from our community of members, which include sponsoring organizations, state agencies, and providers of child care.

Keep crediting as simple as possible.

The revised meal patterns create a standard of crediting based on weight and volume. Changing the crediting process could lead to an unfortunate administrative burden on providers and a potential loss of revenue due to technical errors.

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With the implementation of the ounce equivalents coming in 2019, we are concerned that the complicated calculation process will create an additional barrier. This is an added change that was not in the proposed rule and we wholeheartedly request its removal.

Exceptions must always be made, however they need to be outlined clearly(i.e. leafy green vegetables credit as half the volume served). NCA supports limited, specific exceptions.

The customary use of an item must be utilized to remain inclusive of all participants and diverse cultures (i.e. tortillas as a grain component). NCA feels this encourages participants of diverse, ethnic backgrounds.

Child Nutrition (CN) labeling is traditionally provided only on bulk purchasing and the requirement to use them and have them available for review should be limited to child care facilities that serve large numbers of program participants. CN labeling has proven inconsistent, difficult to locate, and an overall burden with little reward to many sponsors, especially those who oversee small day care centers and homes.

Whole grains are a vital part of a healthy diet. While we support the increased consumption of whole grain items, we urge simplification in the crediting process. A clearer rule along with the elimination of corn starch as a grain would assist providers in purchasing reimbursable items. The current rule is difficult to translate at the grocery store. We support clarification and simplification with the end result of all providers serving more whole grains. Previously, we have required that providers serve grains with a first ingredient of whole grain or enriched grain. The easiest transition for child care providers would be to merely require serving one item per day where the first ingredient is a whole grain.

Education should not be connected to food crediting but recognized as a vital part of the CACFP.

Building healthy habits is a primary focus of the CACFP and can be accomplished in numerous ways, including mealtime interaction and play-based activities. Resources could be developed to inspire education yet not tie to menu planning or meal crediting.

Additional resources are needed to assist providers in food purchasing.

Language barriers can be overcome with picture menus. An updated food buying guide, mobile app and crediting handbook would provide assistance in meal pattern compliance regardless of language needs. Additionally, an online menu planner tool would be useful for many.

High protein yogurt should not be differentiated from regular yogurt.

Providers are already noting sugar limits of yogurt. Asking them to note protein content is overcomplicating the meal recording process.

We realize that high-protein yogurt costs more and may not be feasible for all providers to purchase on a regular basis. NCA recommends using Greek yogurt as an alternative protein for vegetarian or meatless diets when practical.

Current non-creditable foods should be reexamined on their merits.

For example, tempeh could be a healthy alternative food component for vegetarians and those on a restricted diet.

In closing, we appreciate the opportunity to provide comments on a vital component of the CACFP. We welcome the opportunity to work together to ensure the very best nutrition possible for every child in need of our programs.

On behalf of the entire board and members of our association,



Senta Hester
President, Board of Directors