Current Requirement: The Healthy, Hunger-Free Kids Act of 2010 required that as of October 2011 all CACFP sites make potable water available to children throughout the day, including at meal times.¹

USDA’s Proposed Rule: USDA proposes that: 1) water should be freely accessible to children throughout the day; 2) water should be available during meals and snack time, though it does not have to be served alongside the meal, and may not be served in lieu of fluid milk.² Noteworthy is USDA’s statement that “Water should be made available to children to drink upon their request, but does not have to be available for children to self-serve.”

Our Recommendation: While much in the water provision is welcome, we believe that plain water should be available and encouraged for self-serve at all times throughout the day, both inside the site and in outdoor play areas, including with meals and snacks, regardless of whether milk or 100% juice is also served. Further, there should be no caution expressed with regard to serving water at or before meals.

Rationale: The rule on drinking water should be strengthened on the basis of the following:

1) Young children consume inadequate amounts of plain water and excessive sugary drinks;³
2) Modeling water as the first for thirst beverage is critical for the early establishment of healthy beverage behavior, obesity prevention⁴,⁵,⁶ and optimal cognitive function;⁷,⁸
3) There is no evidence that normal water consumption with meals will displace other foods;⁹
4) It is unrealistic and unreasonable to expect young children to recognize thirst or to request a drink of water;
5) It is expected that this recommendation can be implemented with no or very little cost;¹⁰ if tap water is consumed in lieu of sugary drinks and 100% juice, cost savings may be achieved.¹¹
6) Strengthened policies have been shown to result in improved beverages in childcare settings.¹²

The following guidance should also be provided to CACFP sites:¹³

1) Bottled water should be provided only if safe tap water is not readily available; when bottles are necessary, they should be 5-gallon reusable containers when possible;
2) Bottled water should not contain any added vitamins, minerals, carbonation, sweeteners (natural or artificial) or other supplements;
3) Adding fresh fruit, vegetable or herbs for flavoring is allowable, but children should primarily be given plain tap water;
4) Childcare staff should not drink any other beverages in front of children besides plain water, unflavored low- or nonfat milk, and 100% juice;
5) Best practices for provision of self-serve water should be offered (e.g., water pitchers and cups at the table during meals and snacks a well as inside and outdoor at non-meal times);
6) Standards for water testing and water quality issues should be provided;
7) Training for staff and parents on the importance of hydration and drinking plain water should be emphasized.