



April 14, 2015

To: Tina Namian, Branch Chief Policy and Program Development Division FNS, USDA

From: Child Care and Early Education, CLASP

RE: Docket ID FNS-2011-0029

Dear Ms. Namian:

The Center for Law and Social Policy (CLASP) is grateful for the opportunity to offer comments to the United States Department of Agriculture (USDA) regarding the Child and Adult Care Food Program (CACFP). We commend USDA for updating the meal pattern and nutrition standards for the Child and Adult Care Food Program, as well as for school meal programs serving school-based Pre-K and afterschool programs. This is an important opportunity to strengthen the child nutrition programs' role in addressing the nutritional shortfalls in our nation's children's diets and helping to address hunger and obesity.

CLASP advocates for public policies that reduce poverty, improve the lives of poor people, and create ladders to economic security for all, regardless of race, gender, or geography. We target large-scale opportunities to reform federal and state programs, funding, and service systems and then work on the ground for effective implementation.

We agree with USDA that the goal of improving good nutrition for low-income children in child care and afterschool programs is best served by a balanced approach that improves nutrition while allowing providers to continue to afford participation in CACFP. An updated food program, offering meals consistent with the U.S. Dietary Guidelines, will provide much-needed good nutrition to children in child care, Pre-K and afterschool programs. To ensure children get the full value from the proposed improvements we offer the following comments.

We urge the USDA to expand resources for training and technical assistance to child care providers, who may need help in making the transition to healthier meal and snack service. Implementation of the new rules will require ample lead time, phased-in changes, and grace periods. Implementation and administration of this new rule will be resource-intensive. In advance of implementation, USDA should supply training materials for providers, staff and cooks in English, Spanish and other languages as identified by State agencies.

Maintaining the practical balance needed to improve the nutritional value of the meals served without diminishing the value of CACFP to providers and the children they serve is absolutely essential. We know that providers stop participating in CACFP because of onerous administrative burdens and inadequate reimbursement rates. We urge USDA to avoid creating new recordkeeping burdens or increasing the risk of unreimbursed costs due to disallowed meals and snacks. Compliance with the new requirements can be assessed during on-site monitoring reviews, rather than through monthly audits and deductions.

In summary, we endorse the need to update the CACFP and relevant school meals rules, and urge USDA to make the necessary changes to the proposed rule.

Sincerely,

Center for Law and Social Policy (CLASP)