

July 29, 2019

Andrea Farmer
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USDA Food and Nutrition Service
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RE: Delayed Implementation of Grains Ounce Equivalents in the Child and Adult Care Food Program (FNS-2019-0005)

Dear Ms. Farmer:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit comments to the U.S. Department of Agriculture’s Food and Nutrition Service related to its proposed rule to delay the implementation of grain ounce equivalents in the Child and Adult Care Food Program (FNS-2019-0005), originally published in the Federal Register on July 1, 2019 (84 FR 31227). Representing more than 100,000 registered dietitian nutritionists (RDNs),¹ nutrition and dietetic technicians, registered (NDTRs), and advanced-degree nutritionists, the Academy is the largest association of food and nutrition professionals in the United States. We are committed to accelerating improvements in the nation’s health and well-being through food and nutrition.

The Academy supports efforts to delay the implementation of the use of grain ounce equivalents in the Child and Adult Care Food Program in order to allow more time for FNS to develop additional technical assistance materials and for State agencies and sponsoring organizations to provide training and technical assistance to make compliance easier for meal planners nationwide.

It is the position of the Academy of Nutrition and Dietetics that early care and education programs should achieve recommended benchmarks to meet children’s nutrition needs and promote children’s optimal growth in safe and healthy environments while recognizing the barriers to serving healthy foods and beverages from the provider perspective and providing training and technical assistance to child care providers.²

The Academy appreciates the excellent customer service that USDA is providing by listening to stakeholders concerns and needs, developing the appropriate training and technical assistance needed to address those needs and adjusting and modifying implementation expectations in order to best serve stakeholders and maintain the integrity

¹The Academy approved the optional use of the credential “registered dietitian nutritionist (RDN)” by “registered dietitians (RDs)” to more accurately convey who they are and what they do as the nation’s food and nutrition experts. The RD and RDN credentials have identical meanings and legal trademark definitions.

² Position of the Academy of Nutrition and Dietetics: Benchmarks for Nutrition in Child Care. J Acad Nutr Diet. 2018;118(7):1291-1300

of nutrition standards. The Academy suggests that during the delayed implementation, USDA could review the requirement to analyze the impact of requiring all CACFP program operators to switch to using ounce equivalents and determine if the added complexity improves child nutrition. Given that this rule was intended to align CACFP with the National School Lunch and Breakfast program, if changing to the ounce equivalents does not improve nutrition, USDA should consider allowing school-based programs seeking consistency with the school meal rules the option to use ounce equivalents in CACFP rather than mandate it for all CACFP providers. Keeping the program manageable to administer while upholding high nutrition standards should be a priority.

The Academy appreciates the opportunity to submit comments related to this proposed delay in CACFP ounce equivalents implementation. We commend USDA for considering optimal ways to implement child nutrition programs to strike the balance between nutrition integrity and manageable operating requirements. Please contact either Jeanne Blankenship at 312-899-1730 or jblankenship@eatright.org, or Liz Campbell at 202-775-8277 ext. 6021 or ecampbell@eatright.org with any questions or requests for additional information.

Sincerely,



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