



February 9, 2018

Angela Kline, Director
Policy and Program Development
Child Nutrition Programs
Food and Nutrition Service, 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 Child and Adult Care Food Program (CACFP) Forum Board appreciates the opportunity to provide information to USDA regarding Food Crediting in Child Nutrition Programs. The Forum's mission is to promote, protect, and perfect CACFP. In FY 2017, the Forum board member organizations served more than half a million children and more than 110 million meals and snacks through CACFP.

We believe that program success with food crediting means finding a balance between providing children with nutritionally optimal diets and developing guidelines that are straightforward and simple to understand, remember, and implement. Our comments will primarily focus on food crediting as it pertains to CACFP.

The National CACFP Forum recommendations are focused on the following themes:

- Continue to aim for simplicity, avoid complexity, and do not overcomplicate;
- Maintain the current system of categorizing foods focusing on real food meeting the full food category nutrition profiles rather than imitation or highly processed fortified foods. This preserves the nutritional value of the foods served to children through CACFP;
- Uphold CACFP meals and snacks as opportunities for children to learn about healthy foods;
- Continue to exclude "other foods" of limited nutrition value (section 5);
- Address issues around including cultural foods;
- Eliminate the implementation of the upcoming ounce equivalent system for grains in CACFP; and
- Examine options for crediting foods including when a CN label is not available.

To ensure the continued success of CACFP, the National CACFP Forum offers the following responses to USDA's food crediting questions:

1. We recommend continuing to credit foods as they are mentioned in the question and approve of the current exceptions for particular forms of fruits and vegetables, such as crediting dried fruits as twice the volume served. It would be helpful for this to be more consistent across all Child Nutrition Programs. We recommend continuing to credit grains as currently required and not changing CACFP crediting for

grains to ounce equivalents. The current system of crediting grains using readily understandable servings sizes such as cups of or slices of bread works well for CACFP. We are concerned that making this change to ounce equivalents for grains does not add any nutrition safeguards to the program and will unnecessarily complicate the meal pattern. To the extent that CACFP operators understand this change, many are opposed. Additionally, there was not an opportunity to comment on these concerns in other proposed regulations. For grains, we do not believe the school meal programs and CACFP crediting need to be the same. It may be helpful to give schools implementing CACFP the option to using ounce equivalents without requiring other CACFP operators like child care homes and centers to implement them.

2. We recommend maintaining the current crediting practices for fruits and vegetables and not adding any new exceptions for different forms of fruits and vegetables. The more exceptions and different crediting values there are, the more complicated the program becomes.

3. We recommend that fortification not play a role in CACFP food crediting because this increases program complexity. Many program operators do not understand what fortification is or how to identify fortified foods. Additionally many of the nutrients provided by fortified foods can be found readily in other, less processed foods.

4. The presence of certain nutrients is important in crediting, but we recommend that CACFP continue to be a primarily food-based crediting system instead of nutrient-based crediting system to prevent unnecessary complexity. For example, the presence of certain nutrients may help determine whether or not a food is creditable, but we do not recommend adding additional nutrient-specific criteria for particular foods. The food-based crediting system should continue to encourage foods with beneficial nutrients (such as fiber) and limit foods with nutrients that are overconsumed by children (such as sugar, sodium, saturated fat, and trans fat). USDA should continue to rely on the overall nutrient profile, the range of nutrients, as a factor in determining the appropriate category for foods.

5. Sometimes foods without a standard of identity can credit based on Child Nutrition (CN) labels or manufacturers' statements. Unfortunately, these are very challenging for program operators to obtain unless they work through a vendor that readily offers CN labeled products. We recommend that there be an option to credit products based on nutrients, such as what is currently allowed with tofu or non-dairy milks. This might be a good alternative for operators who do have these analysis capabilities.

6. It is appropriate to use "customary use" of a product, but it is very important that "customary use" include consideration of a wide variety of cultures and diets because CACFP serves such a diverse population. "Customary use" varies from culture to culture. For example, there are many traditional foods that are not currently mentioned in the Food Buying Guide that operators would like to serve, such as Okinawan sweet potatoes and tofu noodle soup. We recommend adding more cultural foods to the Food Buying Guide to add clarity on whether or not they are creditable. This will help prevent creditable cultural foods from being accidentally disallowed.

7. We recommend maintaining the current practices for educational considerations to help children learn about what healthy meals and snacks should be.

8. See #5. There might be opportunities to provide more crediting options for foods that can currently only be served based on CN labels or manufacturers' statements, which can be challenging to find.

9. In the Crediting Handbook for CACFP, the explanations about why something is not creditable are very helpful. As briefly highlighted in #6, we recommend adding more cultural foods to the Food Buying Guide to add clarity on whether or not they are creditable.

10. Occasionally, some CACFP operators serve dried meat products, such as beef jerky or summer sausage. We are not aware of programs serving dried seafood snacks or surimi, but these may be served in certain regions of the U.S.

11. Many dried meat/poultry snacks are high in sodium, a nutrient that is overconsumed by many children.

15. Yes, some CACFP program operators are currently offering high protein yogurt as part of a reimbursable meal.

16. We are concerned that reducing the serving size of higher protein yogurts would be too small of a serving size to satiate children. For example, the serving size at breakfast and snack for 1-5 year olds is currently only 1/4 cup of yogurt. In addition, establishing a two (2) tiered crediting system for yogurt based on protein content would be complex and confusing while at the same time decreasing the overall nutrient value of the food-based meal pattern.

17a. We are concerned that trying to qualify or disqualify yogurts based on a particular ingredient or processing method might add complexity without significant nutritional benefits.

20. Popcorn and vegetables chips are served in child care and afterschool programs. Popcorn is a choking hazard for young children.

21. We recommend that USDA continue to exclude "other foods" of limited nutrition value (section 5). We do not recommend allowing popcorn, vegetable chips, or bacon to be creditable.

22. We believe there is a demand for tempeh among some groups. Tempeh could be credited similar to tofu.

23. If tempeh were creditable, it would most likely be served during lunch or dinner meals.

25. We have included some additional comments below on products and resources not already addressed above:

- Currently yogurt that is otherwise creditable is considered non-creditable when it is frozen. Creating homemade yogurt pops or serving yogurt in tubes that are frozen is a common practice. Given that the product is essentially the same, it would make sense to be able to allow this practice. Careful language can help make sure that the yogurts claimed in this way are only low-sugar yogurts and not frozen yogurt purchased in the ice cream aisle.
- We would like to thank USDA for developing the online Food Buying Guide app and new resources in both English and Spanish on the new CACFP meal patterns. These resources help make food crediting and the new guidelines easier to understand for CACFP operators. It would be helpful for more resources to be translated into Spanish and other languages.

Thank you for giving the National CACFP Forum the opportunity to respond to USDA's request for information on Food Crediting in Child Nutrition Programs. We appreciate your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Samantha Marshall". The signature is fluid and cursive, with the first name being more prominent.

Samantha Marshall
Executive Director
National CACFP Forum

A handwritten signature in black ink that reads "Amanda Gallaher". The signature is cursive and clearly legible.

Amanda Gallaher, MPH, RD
Board Member
National CACFP Forum