**Sample Comments & Instructions for Proposed Rule FNS-2020-00926:** *Simplifying Meal Service and Monitoring Requirements in the Child and Adult Care Food Program (CACFP)*

* **Personalize this sample comment and make it your own!** Don’t forget to tell them who you/your organization is (e.g., your mission) and why you care.
* Don’t forget to delete all of the highlighted content and this section of instructions
* When your comments are complete, copy and paste into USDA’s form
* All comments are due by 11:59 PM EST on 3/23/2020
* Follow this link to comment >> <https://www.federalregister.gov/d/2020-00926>

[Name of organization] appreciates the opportunity to submit comments to the U.S. Department of Agriculture’s Food and Nutrition Service related to the proposed rule to simplify meal service and monitoring requirements in the Child and Adult Care Food Program. We respectfully submit the following comments:

1. We SUPPORT efforts to clarify the regulations on meal modifications for disability and non-disability reasons including:

• The expanded definition of disability and replacing “medical or other special dietary needs” with “reasonable modifications for disability requests” and “variations for non-disability requests” with variations for cultural, ethical, Tribal, and religious preferences. Clarification that a medical statement is only required for accommodations that fall outside the meal patterns.

• Maintaining nutrition standards for fluid milk substitutions.

• Adding the expansion of state licensed healthcare professionals who are authorized to write prescriptions to include licensed nurse practitioners and licensed physicians into regulation. However, we do not support a further expanded definition to include licensed professionals who are not otherwise authorized to write medical prescriptions. A state licensed healthcare professional is the appropriate level of medical authority to ensure a child’s health.

2. We DO NOT SUPPORT the inclusion of grain-based desserts in the Child and Adult Care Food Program because:

• Allowing grain-based desserts in the CACFP are not inline with the current dietary recommendations of “no more than 10% of a child’s daily calories should come from added sugars.” The World Health Organization indicates that 5% or less of daily calories from added sugars would provide additional health benefits.

• We have successfully trained the field to meet this healthier standard for grains through CACFP.

• Changes to allowable grain-based desserts would create confusion for the CACFP community.

[Name of organization] commends the USDA for its efforts to simplify the meal pattern and monitoring requirements by including optional flexibilities. Please contact [name and email address] with any questions or requests for additional information.

Respectfully,

[Make sure to include your name, organization (if applicable), city, and state.]