



April 14, 2015

Ms. Tina Namian, JD, MSW
Branch Chief, Policy and Program Development Division
Child Nutrition Programs
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive – Room 1206
Alexandria, VA 22302-1594

Submitted electronically via Regulations.gov

Re: Comments on “Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010” (FNS-2011-0029)

Dear Ms. Namian:

As organizations committed to improving the health and well-being of all Coloradans, we wish to express our support of the Food and Nutrition Service’s (FNS) proposed changes¹ to the meal pattern requirements for the Child and Adult Care Food Program (CACFP). The proposed revisions – based largely on the 2010 Dietary Guidelines for Americans and science-based recommendations of the Institute of Medicine (IOM) – enhance the overall nutritional quality of CACFP meals and snacks, while advancing the broader goals of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA).

In general, we appreciate that these recommendations are rooted in sound nutritional science – enhancements that are profoundly needed, given that the CACFP meal patterns have not been

¹ RIN 0584-AE18, Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010, 80 *Fed. Reg.* 2037, Jan. 15, 2015.

significantly updated since the program's inception in 1968.² Consistent with the HHFKA mandate and as the Dietary Guidelines for Americans continue to evolve, we look forward to subsequent updates to the CACFP meal requirements fashioned on the most recent and relevant nutritional science. We also appreciate that while FNS gave careful consideration to both the cost and practical application of the updated requirements, there are a number of optional 'best practices' specified in the proposed rule that CACFP facilities may implement to take these baseline requirements even further. We urge the USDA to develop resources and incentives for facilities to implement these best practices.

Furthermore, the proposed changes – which call for a greater variety of vegetables and fruits, more whole grains, and less sugar and fat – will help to improve the health and wellness of children and adults across the country, including in the state of Colorado. Nearly 27 percent (more than one in four) of children in the State are overweight or obese. Additionally, between 2011 and 2013, 19 percent of Colorado children were in households that were food-insecure at some point in the past year.³ An inadequate amount of food can threaten the foundation of a child's healthy development, as can too much of the wrong kinds of food such as the low-cost, highly processed foods many families rely on when their food budgets are stretched thin. There is a link between being food-insecure and being obese, regardless of how contradictory these problems may seem. Toward this end, we appreciate that the proposed rule seeks to ensure greater uniformity across federal child nutrition programs, broadly, via the harmonization of the CACFP meal pattern changes with those of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and Special Milk Program (SMP).

In Colorado alone, more than 2,000 sites participate in the CACFP, serving children and adults at participating child care centers, Head Start programs, family child care homes, homeless shelters, after-school programs, emergency shelters, and adult day care centers.

CACFP is a vital food safety-net for many low-income Colorado families, ensuring that children and adults participating in the program have access to nutritious meals and snacks as part of the day care they receive. For children especially, the meals and snacks served within a child care setting are a critical source of nutrition and a great opportunity for them to learn healthy eating habits. Studies have long documented that nutritious meals aid children's cognitive and physical development, while also contributing to school readiness.

In closing, we appreciate your consideration of our comments and urge FNS to move forward in the swift finalization of this rule. Should you have any questions about our comments, please do not hesitate to contact Sara Monge, policy officer of the Colorado Health Foundation who may be reached at 303.953.3664 or smonge@coloradohealth.org.

² <http://www.fns.usda.gov/cacfp/meals-and-snacks>

³ 2015 Kids Count In Colorado: From Plains to Plateaus. The Colorado Children's Campaign

Sincerely,



Rahn Porter
Interim President and CEO
The Colorado Health Foundation



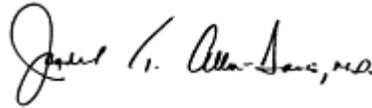
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