



AMERICAN ACADEMY OF  
FAMILY PHYSICIANS  
STRONG MEDICINE FOR AMERICA

April 15, 2015

Tina Namian  
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, Virginia 22302-1594

RE: Docket ID FNS-2011-0029

Dear Ms. Namian:

On behalf of the American Academy of Family Physicians (AAFP), which represents 115,900 family physicians and medical students across the country, I write in response to the U.S. Department of Agriculture's (USDA) Child and Adult Care Food Program: Meal Revisions Related to the Healthy, Hunger-Free Kids Act (7 CFR Parts 210, 215, 220, and 226).

We commend USDA for updating the meal pattern and nutrition standards for the Child and Adult Care Food Program (CACFP), 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.

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.

**Improvements we support:**

- Option to claim a meat or meat alternate as a meal component for breakfast.
- Tofu allowed as a meat alternate.
- "Offer vs. Serve" option for afterschool programs.
- Sugar limits for yogurt and flavored milk.

**In response to USDA's request for comments on the beverages proposals, we offer the following recommendations to ensure healthier beverages for young children in child care:**

- Disallow flavored milk for children under age five.
- Limit juice on the menu to no more than once a day.

[www.aafp.org](http://www.aafp.org)

**President**

Robert L. Wergin, MD  
Millford, NE

**President-elect**

Wanda Filer, MD  
York, PA

**Board Chair**

Reid B. Blackwelder, MD  
Kingsport, TN

**Directors**

Carlos Gonzales, MD, *Patagonia, AZ*  
Carl Olden, MD, *Yakima, WA*  
Lloyd Van Winkle, MD, *Castroville, TX*  
Yushu "Jack" Chou, MD, *Baldwin Park, CA*  
Robert A. Lee, MD, *Johnston, IA*  
Michael Munger, MD, *Overland Park, KS*

Mott Blair, IV, MD, *Wallace, NC*

John Cullen, MD, *Valdez, AK*

Lynne Lillie, MD, *Woodbury, MN*

Emily Briggs, MD, MPH, (New Physician Member), *New Braunfels, TX*

Andrew Lutzkanin, MD, (Resident Member), *Ephrata, PA*

Kristina Zimmerman (Student Member), *Dalton, PA*

**Speaker**

John S. Meigs Jr., MD  
Brent, AL

**Vice Speaker**

Javette C. Orgain, MD  
Chicago, IL

**Executive Vice President**

Douglas E. Henley, MD  
Leawood, KS

- Make water available as developmentally appropriate.

**Recommendations for improvements:**

- Allow the introduction of baby foods at six month, consistent with a physician's recommendation and their parents plan.
- Do not separate the fruit and vegetables components: maintain the current flexibility.
- Adopt only the WIC sugar limit for cereal.
- Do not add a fourth age group (13-18 years of age) to the children's meal pattern without additional funding.
- For schools, maintain the ability to offer a single menu using school meal rules for Pre-K and afterschool programs for school-based and school-vended programs.

**We support the following proposed improvements and offer recommendations for strong clear standards and practical implementation:**

- Proposed requirement to serve one whole grain a day:
  - We recommend compliance with this requirement be assessed during on-site monitoring reviews not through meal deductions and monthly menu auditing.
  - This requirement should be applicable only when a grain is served during the day. For example, an afterschool provider serving only a snack might not have a grain component each day.
- Proposed on-site frying ban:
  - We recommend USDA issue guidance with a clear definition: deep fat frying (submerging food in hot oil) is disallowed and stir frying and sautéing are allowed.
  - We recommend training and technical assistance on the best practice of limiting the service of commercially prepared fried foods to no more than once per week.

**In response to the request for suggestions for implementing the best practices:**

- We recommend USDA create CACFP model wellness policies and a USDA recognition program (similar to HealthierUS Schools Challenge) featuring the CACFP best practices and child care-wide policies, such as eliminating sugary beverages.
- We support the proposed best practices structure and protections from additional costs and disciplinary action.

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. USDA's

Ms. Namian  
Page 3 of 3  
April 15, 2015

already successful implementation of the requirement to serve non-fat or low-fat milk provides an excellent model.

In summary, we support the need to update the CACFP and relevant school meals rules, and urge USDA to make the necessary changes to the proposed rule. We appreciate the opportunity to provide express these recommendations. For any questions please contact Sonya C. Clay, Government Relations Representative, at 800-274-2237, extension 2520 or [sclay@aafp.org](mailto:sclay@aafp.org).

Sincerely,

A handwritten signature in black ink that reads "Reid B. Blackwelder MD". The signature is written in a cursive style with a large, looping initial "R".

Reid B. Blackwelder, MD, FAAFP  
Board Chair