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Re: Proposed CACFP regulations

Nutrition Policy Institute (NPI) at the University of California appreciates this opportunity to submit comments on the proposed rule to implement new meal patterns for meals and snacks in the Child and Adult Care Food Program (CACFP). NPI has a long history of nutrition research with regard to CACFP, including two studies of what food and beverages are served to children in licensed childcare in California. These studies have provided the basis for two California statutes improving nutritional quality in childcare, AB 2084 (2010) and AB 290 (2013).

First, we applaud USDA on the new rule. There is much to like, and we imagine that, had there been new, additional funding, the rule would have been even more expansive. Even so, the rule strongly reflects the development of the science regarding the proper nutrition for children aged 0-5 years: breast milk in the early months, transitioning to a diet rich in fresh fruit and vegetables, whole grains, low-fat dairy, and lean meat, and with declining amounts of sugar and fat. This is the clear message from the Institute of Medicine's report and from the growing consensus of researchers and health professionals.

NPI offers the following recommendations for strengthening the rule. The first four are supported by 1-page attachments that add depth and authority to our recommendations for why these should be regulations (rather than "best practices").

- 1. Water.** While much in the water provision is welcome, the rule should provide that plain water be readily available and encouraged for self-serve at all times throughout the day, both inside the site and in outdoor play areas, including with meals and snacks, regardless of whether milk or 100% juice is also served. Further, there should be no caution expressed, as there is in USDA memorandum 11-2011,¹ with regard to serving water at or before meals. There is no science to support the caution; there is some evidence to suggest that the concern about water's displacement of milk or food is unjustified.²
- 2. Juice.** As recommended by the Institute of Medicine Committee on CACFP, fruit rather than fruit juice should be served at most meals and snacks. Only 100% fruit juice with no added sugar ever should be served, and that should be limited to one age-appropriate serving per day for children 1 year and older.

3. **Milk.** Consistent with the Institute of Medicine Committee on CACFP, flavored milk should not be allowed in CACFP.
4. **Whole grains.** As recommended by the Institute of Medicine Committee on CACFP,³ considering all the meals and snacks served in a day, at least half of all grains should be whole grain or whole grain-rich.⁴ Providers are encouraged to gradually increase the proportion of grains that are whole to well above half of grains and to include 100% whole grain foods often at meals and snack-times.
5. **Training and technical assistance.** The success of the new nutrition standards is likely to depend on good skills for planning, execution, and promotion (through behavioral economics and nutrition education) of the meals and snacks. Accordingly, USDA should be encouraged to introduce the state agencies early and fully to the new standards and to prepare materials that the state agencies can use to train sponsors and providers. Our research on the implementation of healthy beverage standards (AB 2084) in California childcare⁵ supports the need for provider and sponsor training and technical assistance if the improvements in new CACFP regulations are to be fully realized.

Endnotes:

- 1) “However, caregivers should not serve young children too much water before and during meal times; excess water may lead to meal displacement, reducing the amount of food and milk consumed by the children.” USDA Memo 20-2011.
- 2) Ritchie L, Rausa J, Patel A, Braff-Guajardo E, Hecht K. Providing Water With Meals is Not a Concern for Young Children: Summary of the Literature and Best Practice Recommendations. May 2012. Available at: http://cfpa.net/ChildNutrition/ChildNutrition_CFPAPublications/WaterWithMealsYoungChildren-2012.pdf.
- 3) Murphy SP, Yaktine AL, Suitor CW, Moats S, Editors; Committee to Review Child and Adult Care Food Program Meal Requirements; Institute of Medicine. Child and Adult Care Food Program: Aligning dietary guidance for all. Washington, DC: The National Academies Press. 2011.
- 4) A serving of a whole grain-rich food must meet at least one of the following two specifications: 1) The product includes FDA-approved whole grain health claim on its packaging; 2) product ingredient listing lists whole grain first. (Refer to reference 1 for additional details).
- 5) Ritchie LD, Sharma S, Gildengorin G, Yoshida S, Braff-Guajardo E, Crawford P. Policy improves what beverages are served to young children in childcare. J Acad Nutr Diet 2014;Sep 11.