



# Afterschool Alliance

AFTERSCHOOL FOR ALL

Tina Namian, Branch Chief PPDD  
Child Nutrition Programs, USDA  
RE: Docket ID FNS-2011-0029

Dear Ms. Namian:

Thank you for the opportunity to comment on the proposed meal pattern for Child and Adult Care Food Program (CACFP) - Docket ID FNS-2011-0029. The Afterschool Alliance is a non-profit organization that works to ensure that all children and youth have access to quality afterschool and summer learning opportunities. Our network of more than 26,000 afterschool partners is expanding learning opportunities for students nationwide and tapping community partners to keep children safe and well-nourished, and provide engaging, hands-on activities that raise school attendance, academic achievement and graduation rates.

Over the past several years we have worked closely with local, state and national partners to increase participation in the CACFP At-Risk After School Meal and Summer Food program with the goal of ensuring children from families in need are provided with nutritious meals while in summer learning and afterschool programs. I wish to commend USDA for taking a balanced approach to updating the nutrition requirements for CACFP.

The community and faith-based organizations operating the afterschool and child care programs using CACFP have limited budgets. They struggle to make ends meet -- many using volunteers and donated food. For this reason, I urge USDA to allow flexibility and avoid creating more record keeping requirements and increasing the risk of losing meal reimbursements. Please see below for our recommendations.

- The proposed requirement to serve one whole grain a day should be applicable only when a grain is served during the day. Afterschool programs serving only a snack might not have a grain component each day.
- Allow the option to serve two vegetables for afterschool meals rather than mandating a fruit and a vegetable.
- Limit the sugar in flavored milk and yogurt: USDA's proposed options B2 and C2.
- Keep the best practices as guidelines only.
- Do not add a fourth age group (13-18 years of age) to the children's meal pattern without additional funding to cover the costs necessary for larger portion sizes that bigger appetites will require.
- For schools, maintain the ability for school food service to use the school meal requirements to produce CACFP meals for afterschool programs. School vended meals can help to keep community-based afterschool programs viable.

The new requirements should be assessed during on-site monitoring reviews and not through monthly menu auditing and meal reimbursement deductions. Afterschool programs need support and technical assistance not the threat of losing much needed meal reimbursements. Programs already report that the reimbursements are not always enough to cover the costs of the meals and snacks.

Sincerely,

Jodi Grant  
Executive Director