Ms. Andrea Farmer, Chief  
Community Meals Branch  
Policy and Program Development Division  
Food and Nutrition Service  
U.S. Department of Agriculture  
3101 Park Center Drive  
Alexandria, Virginia 22302

Dear Ms. Farmer:

On behalf of the 58,000 members of the School Nutrition Association (SNA), we appreciate this opportunity to comment on the Food and Nutrition Service’s (FNS) Proposed Rule *Delayed Implementation of Grains Ounce Equivalents in the Child and Adult Care Food Program* published in the *Federal Register* on July 1, 2019.

SNA agrees with this proposed rule that seeks to delay implementation of the grains ounce equivalents for two years for the Child and Adult Care Food Program (CACFP). School nutrition programs were provided flexibility in areas related to the changes in recent meal pattern requirements post regulation implementation. Until the flexibilities were made available, the implementation process created many hardships and challenges to program operators. Because the grain ounce equivalents term and calculation are new to many CACFP operators, it would seem reasonable to delay implementation until thorough training and technical assistance can be offered by FNS and State Agencies. The technical assistance and resources will need to be clear and concise as well as available in multiple formats. Because many school programs also sponsor CACFP, it might be of value to incorporate them and align where there are program similarities.

Thank you again for the opportunity to respond. We look forward to continued collaboration with the Food and Nutrition Service.

Sincerely,

Gay Anderson, SNS  
President

Patricia Montague, CAE  
Chief Executive Officer