



February 22, 2023

The Honorable Tom Vilsack
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, DC 20250

Dear Secretary Vilsack:

The American Commodity Distribution Association (ACDA) and the Urban School Food Alliance (the Alliance) urges the U.S. Department of Agriculture's Food and Nutrition Service (FNS) to provide an additional 60 days for the submission of public comments in response to the proposed rule entitled: "Child Nutrition Programs: Revisions to Meal Patterns Consistent with the 2020 Dietary Guidelines for Americans" published in the Federal Register on February 7, 2023.

This is the most significant proposed rule since the Nutrition Standards in the National School Lunch and School Breakfast Programs, published on January 26, 2012. ACDA's annual meeting is scheduled for April 16-19, 2023, in Anaheim, California, and we would hope to have the opportunity to use that planned meeting to further gauge ACDA member concerns and interests in the development of our comments. The Alliance is also consulting with its membership to assess their views on the proposed rule.

When the proposed rule for Nutrition Standards in the National School Lunch and School Breakfast Programs was published on January 13, 2011 a 90-day comment period was allowed. At a minimum a similar comment period should be granted in this instance. Given the experiences in implementing the 2012 rule, and ongoing supply chain issues, we believe that valuable comments can be provided to the Department with an extended comment period.

We thank you for the consideration of our request for a 60-day extension of the comment period, and look forward to working with you and your colleagues at USDA.

Sincerely,

A handwritten signature in black ink that reads 'Noelle Sanchez'.

Noelle Sanchez, President
American Commodity Distribution Association

A handwritten signature in black ink that reads 'Kathryn T. Wilson, PhD, SNS'.

Dr. Katie Wilson, Executive Director
Urban School Food Alliance

cc: Deputy Under Secretary Stacy Dean
FNS Administrator Cindy Long
Laura Castro, Director, Foods Operation Division