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Comments Presented to USDA Public Meeting in Chicago

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On behalf of the American Celiac Disease Alliance and Enjoy Life Foods, I thank you for giving me the opportunity to present comments today. I would also like to thank the USDA for considering the needs of the millions of children affected by Celiac Disease, food allergies, food intolerances, autism and other health concerns that require them to follow special diets.

This topic is very important to me personally and it is central to the mission of Enjoy Life Foods, the company that I founded in 2001. Our Chicago-area based food company is dedicated to meeting the needs of people who follow special diets. We offer foods that are both gluten-free and free of the eight most common allergens, as defined by the FDA.

Since founding Enjoy Life Foods seven years ago, I have developed a unique understanding of the millions of children, parents and caregivers who deal with dietary restrictions due to:

- Celiac Disease, the world's most common genetic auto-immune disease, that affects at least 1% of the population¹. The only known treatment for Celiac Disease is strict adherence to a gluten-free diet for life (gluten is the protein that is found in wheat, barely and rye).
- Food allergies are estimated to affect 6 to 8% of children and 3 to 4% of adults², and diagnoses are on the rise. For the 12 million Americans with food allergies, symptoms can range from mild to life threatening as is the case with anaphylactic shock.
- Another 30 million Americans have food intolerances³ that cause them to avoid certain foods.
- And finally, one in 150 children are affected by autism⁴ which can be effectively managed by following a diet free of gluten and casein (the protein found in dairy).

Today I would like to address directly the USDA's theme of "ensuring that all eligible persons have access to program benefits". **Unfortunately, under the current program, children with Celiac Disease, food allergies, or other health issues have unique dietary and nutritional needs that are not accommodated in the existing *National School Lunch Program*.**

The number excluded from program benefits is somewhat hard to quantify, however, it is a sizeable population. Based on published data, the program served 30.5 million children.⁵ Approximately 300,000 of these students likely have Celiac Disease. Another 1.8 to 2.4 million likely have food allergies that prevent them from eating wheat, dairy, peanuts, tree nuts, egg, soy, fish and shellfish. This means that (conservatively) **2 million students are not being offered low-cost or free lunches that they can safely consume!** While this number is large today, given rapid increases in the incidence of food allergies and the rising diagnosis rate for Celiac Disease, this issue is going to be magnified significantly in the near future.

At Enjoy Life, we believe strongly that every child has the right to learn in a safe and healthy school environment. This includes the classroom, the playground AND the school lunchroom. Under section 504 of the *Rehabilitation Act and the Americans with Disabilities Act*, any children with a disability (such as Celiac Disease or food allergies) cannot be excluded by law from participating in federally funded programs or activities, including schooling and school lunch programs.

In talking with schools, we understand that gluten-free and allergy-friendly food choices are severely limited and/or completely unavailable to the 2.1 million students who need them. Significant program changes are needed immediately to address the needs of this rapidly expanding population.

The **current situation can be remedied and solutions are readily available today:**

- School food authorities and food service providers, such as Sodexo, have access to a variety of nutritious gluten-free and allergy-friendly packaged food products from companies such as Enjoy Life, Glutino and Ener-G, among others. In fact, all Enjoy Life products are not only gluten-free but also allergy-friendly so they address the needs of BOTH Celiac and food allergic students.
- State lists of eligible foods must also be expanded to include foods that meet the requirements of gluten-free and food-allergic diets so that schools can receive reimbursement

On behalf of the children, their parents and caregivers that are currently excluded from receiving program benefits, I strongly urge the USDA to make the necessary changes to the *National School Lunch Program* to ensure that ALL eligible students are able to benefit from this important, federally assisted meal program.

¹ Dr. Stefano Guandalini, University of Chicago Celiac Disease Center

² FAAN

³ National Institutes of Health

⁴ Autism Society of America

⁵ USDA National School Lunch Program fact sheet