

MSNA
Talking points
and
sample letter

The following are the areas of concern in detail. This will help you develop your own Presentation, for whomever you wish to talk with in your district. Remember the areas of concern that were sent in from all over our state. There may be more you wish to express concerning your district!

The letter is a sample for you to use.....
PLEASE send in your response.
Time is almost up.... APRIL 13th!!

Mississippi Issues:

Public Law 111-296 “Healthy, Hunger-Free Kids Act of 2010.

Section 201 Due to the current and proposed CRE cycles there is a tremendous lag time between implementing standards and receiving the 6 cents per meal reimbursement. Additionally, if the SFA meets the criteria and receives the additional reimbursement, it does not come close to the estimated increases for food and labor cost which equate to approximately 14 cents for each reimbursable lunch and 50 cents for each breakfast.

Section 205 Equity in school lunch pricing will result in alienating the paid student who cannot afford the increased cost of the meal. School districts need more information on how to implement this process.

Section 203 Mandating water availability in dining rooms will result in increased cost due to initial cost of water fountains, installation, food safety issues, costs of disposals, maintenance related challenges.

Section 207 Change in CRE review cycle from 5-year to 3-year cycle – Currently MS CNP conducts both the CRE and the SMI on the same Combined School Review. Moving to a three-year cycle would substantially increase administrative cost.

Nutrition Standards in the National School Lunch and School Breakfast Programs: Proposed Rule:

Meal Pattern comments (*Quotes from proposed rule are in italics with page numbers following. Comments are in regular font.*)

• **Cost** – *The analysis estimates that total cost may increase by 6.8 billion through fiscal year (FY) 2016, or roughly 12 percent when fully implemented in FY 2015. The estimated increases in food and labor costs are equivalent to about 14 cents for each reimbursable school lunch and about 50 cents for each reimbursable school breakfast in FY 2015. Page 2529*

• **Sodium** – *Findings showed that school menu planners can reduce sodium by approximately 10 percent through menu modification. Industry can reduce sodium in school food products by approximately 20 to 30 percent using current technology. The remaining reduction (60–70%) requires innovation. Page 2503*

Product availability – Currently available products for school foodservice programs do not meet new requirements. Flavor profiles and formulations would have to be modified to meet changed requirements. It is probable that costs of reformulating these products would increase beyond estimated increases in costs.

• **OVS** – *Under IOM's preferred option, a student may decline 1 food item at breakfast but must select 1 fruit or juice. For lunch, the student may decline 2 food items but must select 1 fruit or vegetable. Page 2504*

• **Weighted choices** – *SA would review menu and production records for a two-week period to assess compliance with the meal pattern; conduct a weighed nutrient analysis to determine the average levels of calories, sodium and saturated fat in the planned meals; and confirm that food products and ingredients used to prepare school meals zero grams of trans fat. Pg 2505*
Weighted choices could result in different menus for the same grade level schools in some districts.

• **Combined grade levels** – *challenge of changing portion sizes as grades change and/or requirement to meet lowest sodium range for all grades in school. Page 2499*
An example is a K-12 attendance center where students do not come in grade order. This will present challenges in meeting caloric and sodium requirements.

• **Training** – *SAs may provide training and technical assistance to SFAs on new calorie and meal pattern requirements, age/grade groupings, and revised nutrient requirements. Moving to a single food-based menu planning system may simplify the meal service for some schools and will likely streamline the meal planning process, but may require initial training to accomplish. Page 2536* Our concern is the availability of guidance and training resources for state agencies and local school districts on a timely basis. After the comment date, USDA will review comments and publish final meal pattern requirements. This leaves only a few months between final rule and implementation to train state agency staff, local school district foodservice administrators, and site staff on implementation of changes.

• **Participation** – *Any revision to the content of school meals or the method of preparation may have an effect on the acceptance of school meals. (page 2538)*

Comparison of Various Nutrient Standards

The U.S. Department of Agriculture (USDA) requested that the Institute of Medicine (IOM) provide recommendations to revise the nutrition- and food-related standards and requirements for the NSLP and the SBP. This request relates to the congressional requirement that USDA issue new guidance and regulations for the Nutrition Standards and Meal Requirements of the school meal programs. In particular, the committee was asked to review and assess the food and nutritional needs of school-aged children in the United States using the 2005 *Dietary Guidelines for Americans* and the IOM's Dietary Reference Intakes and to use that review as a basis for recommended revisions to the NSLP and SBP Nutrition Standards and Meal Requirements. The goal is the development of a set of well-conceived, practical, and economical recommendations for standards that reflect current nutritional science, increase the availability of key food groups as appropriate, and allow these two meal programs to better meet the nutritional needs of children, foster healthy eating habits, and safeguard children's health. (1)

School Breakfast Program

Criteria	School Meal Initiative (SMI)	HealthierUS School Challenge (HUSSC)	Institute of Medicine (IOM)		
			Recommended to replace SMI		
Status of Standard	Required	Does not exist			
Grade groups	K-12		K-5	6-8	9-12
Meal Pattern					
Meat/Meat Alt	Total of Meat/Meat Alternate and Grain/Bread servings must be 2 per day.		1 oz	1 oz	7-10 oz per week
Grains/Breads			7-10 per week. Half or more must be whole grain.	8-10 per week. Half or more must be whole grain.	9-10 per week. Half or more must be whole grain.
Vegetables/Fruits	½ cup per day		No vegetables required 1 cup fruit per day no more than ½ from juice	No vegetables required 1 cup fruit per day no more than ½ from juice	No vegetables required 1 cup fruit per day no more than ½ from juice
Milk	8 oz per day		8 oz. per day low-fat milk (1% or less)	8 oz. per day low-fat milk (1% or less)	8 oz. per day low-fat milk (1% or less)
Nutrients					
Calories	> 554		350-500	400-550	450-600
Protein	10grams		No standards established		
Calcium	257 grams				
Iron	3.0 mg				
Vitamin A	197 RE				
Vitamin C	13 mg				
Total Fat	≤ 30% of calories				
Saturated Fat	< 10% of calories				
Trans fat	No standard		< 10% of calories	< 10% of calories	< 10% of calories
Sodium	No standard		Nutrition Label must state zero.	Nutrition Label must state zero.	Nutrition Label must state zero.
			≤ 430 mg*	≤ 470 mg*	≤ 500 mg*

* Sodium targets are to be reached by the year 2020.

(1) IOM (Institute of Medicine). 2009. *School Meals: Building Blocks for Healthy Children*. Washington, DC: The National Academies Press.

Comparison of Various Nutrient Standards for National School Lunch Program

Criteria	School Meal Initiative (SMI)			HealthierUS School Challenge (HUSSC)	Institute of Medicine (IOM)		
	Required			Optional in addition to SMI	Recommended to replace SMI		
Grade groups	Preschool	K-3	4-12	Elementary (Secondary added 11/2/09)	K-5	6-8	9-12
Meal Pattern							
Meat/Meat Alt	≥ 1 ½ oz	≥ 1 ½ oz	≥ 2 oz	Same as SMI	8-10 oz per week	9-10 oz per week	10-12 oz per week
Grains/Breads	≥ 8 per week	≥ 8 per week 3 must be whole grain**	≥ 8 per week	Same as SMI. 3-5 of the grain servings must be whole.	9-10 per week. Half or more must be whole grain.	9-10 per week. Half or more must be whole grain.	12-13 per week. Half or more must be whole grain.
Vegetables/Fruits	2 or more items to add up to ½ cup each day	2 or more items to add up to ½ cup each day ≥ 3 different fruits and 5 different vegetables /week. Try for dark green/orange 3/week. Fresh F or V daily.**	2 or more items to add up to ½ cup each day	1 serving is at least ¼ cup. At least 5 different vegetables per week, 3 must be dark green or orange, 1 must be a legume At least 5 different fruits per week, 1 (or 2) must be fresh	≥ 3 ¾ cups vegetables per week; ½ cup from dark green, ½ cup from orange, ½ cup from legumes, 1 cup from starchy and 1 ¼ cup from other. ≥ 2 ½ cups fruit per week	≥ 3 ¾ cups vegetables per week; ½ cup from dark green, ½ cup from orange, ½ cup from legumes, 1 cup from starchy and 1 ¼ cup from other. ≥ 2 ½ cups fruit per week	≥ 5 cups vegetables per week; ½ cup from dark green, ½ cup from orange, 1 cup from legumes, 1 cup from starchy and 2 ½ cups from other. ≥ 5 cups fruit per week
Milk	8 oz. per day	8 oz. per day Max milk fat of 1%**	8 oz. per day	Same as SMI but may only serve low-fat milk (1% or less)	8 oz. per day low-fat milk (1% or less)	8 oz. per day low-fat milk (1% or less)	8 oz. per day low-fat milk (1% or less)
Nutrients							
* Calories	≥ 517	≥ 633	≥ 785	Same as SMI	550-650	600-700	750-850
* Protein	7 grams	9 grams	15 grams		No standards established		
* Calcium	267 grams	267 grams	370 grams				
* Iron	3.3 mg	3.3 mg	4.2 mg				
* Vitamin A	150 RE	200 RE	285 RE				
* Vitamin C	14 mg	15 mg	17 mg				
* Total Fat	≤ 30% of calories	≤ 30% of calories	≤ 30% of calories				
* Saturated Fat	< 10% of calories	< 10% of calories	< 10% of calories	< 10% of calories		< 10% of calories	< 10% of calories
* Trans fat	No standards established			Standard only for extra sale items; < 0.5 g per serving	Nutrition Label must state zero.	Nutrition Label must state zero.	Nutrition Label must state zero.
* Sodium	No standards established			Standard only for extra sale items; ≤ 480 mg for non-entrees	≤ 640 mg*	≤ 710 mg*	≤ 740 mg*

* Sodium targets are to be reached by the year 2020.

**Mississippi Nutrition Standards

Chief, Policy and Program Development Branch
Child Nutrition Division
Food and Nutrition Service, Department of Agriculture
3101 Park Center Drive, Room 640
Alexandria, Virginia 22302-1594

Re: Nutrition Standards in the National School Lunch and School Breakfast Program Proposed Rule

Ms. Brewer,

Mississippi Public Schools and our Child Nutrition Programs are willing to remain the leading catalyst in developing healthier lifestyles, nutritionally and physically.

Our Child Nutrition Program Administrators agree with the philosophy and intent of the Nutrition Standards in the National School Lunch and School Breakfast Programs: Proposed Rule. We are aware of our “Weighted” health status and need as a state to make these changes. However, we are concerned about the cost associated in meeting these meal standards, the potential decrease in participation, availability of products and the need for additional nutrition education.

We have made significant improvements in our programs during the last decade. While we agree with many of the recommendations, the “Proposed Standards” without additional funding will cause hardships, both financially and operationally. We want the evolution of our programs to continue not regress.

Specifically, we have outlined some of our concerns on the attached document. We respectfully ask that you give consideration to these concerns and the impact that it will have on our programs and ultimately the children in our districts.

Sincerely,

Superintendent, CN Director, etc.

C: Congressman, Senator, School Board President

Specific Mailing Instructions

- To be assured of consideration, written comments must be postmarked on or before April 13, 2011
- **Preferred Method:** Federal eRule making Portal at <http://www.regulations.gov>. Follow the online instructions for submitting comments
- **Mail:** Comments should be addressed to Julie Brewer, Chief, Policy and Program Development Branch, Child Nutrition Division, Food and Nutrition Service, Department of Agriculture, 3101 Park Center Drive, Room 640, Alexandria, Virginia 22302-1594
- **Hand Delivery or Courier:** Deliver comments to the Food and Nutrition Service, Child Nutrition Division, 3101 Park Center Drive, Room 640, Alexandria, Virginia 22302 – 1594, during normal business hours of 8:30 a.m. – 5 p.m.
- All comments submitted in response to this proposed rule will be included in the record and will be made available to the public. Since USDA is anticipating a large volume of comments, we request that commenters submit comments through only one of the methods listed above. Please be advised that the substance of the comments and the identity of the individuals or entities submitting the comments will be subject to public disclosures. FNS will make the comments publicly available on the internet via <http://www.regulations.gov>.
- **For further information contact:** William Wagoner or Marisol Benesch, Policy and Program Development Branch, Child Nutrition Division, Food and Nutrition Service at (703) 305-2590