



Monday, November 19, 2018

Dr. Ken Wagner
Commissioner
Rhode Island Department of Education
255 Westminster Street
Providence, RI 02903

RE: Notice of Proposed Rulemaking 200-RICR-20-25-3

Dear Commissioner Wagner:

I am writing to voice strong support for 200-RICR-20-25-3, "Regulations Governing Nutritional Requirements for Reimbursable Meals and Competitive Foods and Beverages; Limitations on Competitive Foods and Beverages at Meal Time," as proposed by the RI Department of Education (RIDE) on September 11, 2018.

I am the Executive Director of the Rhode Island Public Health Institute. Our organization aims to eliminate disparities in health outcomes across Rhode Island and beyond. We have a specific focus on nutrition-related chronic disease such as obesity, diabetes, and heart disease. We believe this proposal, which would maintain high standards for school meals, is an important measure to ensure healthy food for our children. This public commitment is a crucial step to preventing dietary disease.

Our organization's commitment to chronic disease prevention aims to focus most on the disparities in health outcomes amongst low-income households and communities of color. Rhode Island school meals are an important source of meals for children living in low-income households, providing 1 of every 10 meals for all households living under 130% of the poverty line, which is the same threshold that qualifies children for free school meals.¹ Ensuring that these meals provide high-quality, nutritious food to low-income children is essential to ensuring the health and well-being of students who need this food the most.

Rhode Island schools enjoy some of the highest nutrition standards in the country. We can't take a step backwards by rolling back these important measures for students. Schools have been implementing the existing Rhode Island standards for many years. During this time, Governor Raimondo's administration has adopted food as a priority in the state. In 2017, the state adopted the first Strategic Food Plan, which emphasizes the fact that Rhode Island leads the nation in nutrition requirements and Farm to School activities. This plan recognizes school meals as a vital piece of ensuring food security for all Rhode Islanders.² The proposed 200-RICR-20-25-3 regulations represent an opportunity to continue the important work RIDE has done to promote access to health food for its students.

In closing, we urge adoption of 200-RICR-20-25-3 as proposed. We would be happy to work with you to promote the health value of these standards and advocate for their continued implementation. Thank you for your commitment to the health of Rhode Island's children.

Sincerely,

Amy Nunn, ScD
Associate Professor of Public Health and Medicine
Brown University
Executive Director
Rhode Island Public Health Institute

¹ "2016 Status Report on Hunger In Rhode Island." Rhode Island Food Bank. < <http://rifoodbank.org/wp-content/uploads/2016/02/2016-RICFB-StatusReport-Web.pdf> >. Accessed November 16, 2018.

² "Rhode Island Food Strategy." State Of Rhode Island. <http://www.dem.ri.gov/relishrhody/documents/hungertses.pdf>. Accessed November 16, 2018

Calise & Sons Bakery, Inc.

2 Quality Drive

Lincoln, RI 02865



401.334.3444 / 800.225.4737

Fax: 401.334.0938

www.calisebakery.com

October 11, 2018

To Whom It May Concern,

I am writing today to share information with those participating in the Public Hearing regarding state nutrition standards for RIDE. For those who might not be familiar with Calise, I am the 4th generation leader of our family business that began in 1908. Our 85,000 sq. ft. bakery is located in Lincoln, RI and we have 350 employees. We also operate distribution centers in Providence, RI, Wareham, MA, Worcester, MA, Billerica, MA and Wallingford, CT.

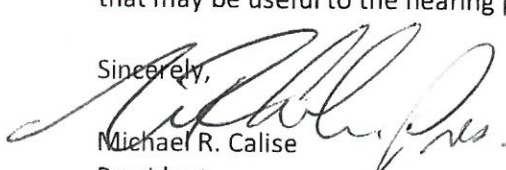
For the past 10 years or so Calise Bakery has been working with Public School Nutritionists at city run school dining programs as well as managed dining programs with Sodexo, Aramark and Chartwells to provide students with Whole Grain products that meet various dietary guidelines. Our R&D folks worked very closely with school lunch executives to formulate products that satisfy Federal creditable grain requirements and be palatable for students. After several iterations of sampling and reformulating over the years, we produce a product that is 51% White Whole Wheat flour; this product meets creditable grain requirements, tastes great and is accepted by students. Once we determined we had a winning formula, we produced a whole line of products geared specifically for k-12. We are very respectful of satisfying nutritional standards required by Federal and State governments while serving products the students enjoy eating.

Just recently, we have added a Whole Grain Texas Toast to our portfolio to expand menu choices for the students. We are able to make adjustments to products and add new items as requested because our bakery is local and flexible in its operations.

Today, we are serving over 900 k-12 school buildings in RI, MA and CT with our Whole Grain products. We allow all customers to call by 3PM for next day delivery. Calise is dedicated to excellent customer service. We are especially mindful of time of delivery requirements in k-12 for school lunch programs to be successful in serving students each day. It is our hope that we will continue to serve all RI schools with great tasting, nutritious bread and rolls.

Please contact myself or Mike Pritchard if you have any questions or require any additional information that may be useful to the hearing process.

Sincerely,


Michael R. Calise
President

Carey, Steve

From: Teixeira, Angela
Sent: Wednesday, November 28, 2018 11:14 AM
To: Lopes, Sandra; Carey, Steve
Cc: Kechejian, Christine
Subject: FW: School Nutritional standards
Attachments: RIDE letter for public hearing.pdf

From: Michael Calise [mailto:mcalise@calisebakery.com]
Sent: Wednesday, November 28, 2018 9:30 AM
To: Teixeira, Angela <Angela.Teixeira@ride.ri.gov>
Subject: School Nutritional standards

Angela,

Hi. I understand that another hearing is coming up regarding school nutritional standards. Attached is a letter that I hope will be helpful in the Board's deliberations concerning nutritional standards, specifically Whole Grain standards, as they apply to fresh bread products. Thank you.

Michael R. Calise, President
401-616-1023 (o)
401-639-1179 (c)



November 30, 2018

Dr. Ken Wagner
Commissioner
Rhode Island Department of Education
255 Westminster Street
Providence, RI 02903

RE: Notice of Proposed Rulemaking 200-RICR-20-25-4

Dear Commissioner Wagner:

We are writing on behalf of the Providence Public School District (PPSD) Health and Wellness Committee and the City of Providence's Healthy Communities Office in support of 200-RICR-20-25-4, "Regulations Governing Nutritional Requirements for Reimbursable Meals and Competitive Foods and Beverages; Limitations on Competitive Foods and Beverages at Meal Time," as proposed by the RI Department of Education (RIDE).

The PPCSD Health and Wellness Committee and the Healthy Communities Office are the leading prevention and policymaking bodies for youth health in Providence. We collectively work to support Providence students by implementing evidenced-based programs and policies; promoting effective health education; supporting comprehensive environmental strategies; and promoting the health and wellness of students and families.

Food served in schools plays a key role in the health and wellness of Providence students. Students spend a large amount of their day in school settings. At the same time, given PPCSD's high rate of free and reduced meal eligibility, Providence students rely heavily upon school meals and snacks. We therefore support nutrition standards that foster a healthy educational environment for our students and are in alignment with our health education curriculum and policies. Providence has been implementing the existing Rhode Island nutrition standards for many years and we look forward to maintaining these high standards to support the health of our students.

We strongly encourage you to support 200-RICR-20-25-4 and thank you for your consideration.

Sincerely,



Robert Gondola, Jr.
Chair, Health and Wellness Committee
School Board
Providence Public School District



Ellen Cynar, MS, MPH
Director, Healthy Communities Office
City of Providence

THE
UNIVERSITY
OF RHODE ISLAND
COLLEGE OF
HEALTH SCIENCES



DEPARTMENT OF NUTRITION AND FOOD SCIENCES

URI Providence Campus, 80 Washington Street, Room 300, Providence, RI 02903 USA p: 401.277.5270

Cooperative Extension Urban Nutrition Institute

Expanded Food and Nutrition
Education Program (EFNEP)
<http://web.uri.edu/efnep>

Supplemental Nutrition Assistance
Program Education (SNAP-Ed)
<http://web.uri.edu/snaped>

Children, Youth and Families
at Risk (CYFAR)

Angela Teixeira
Board of Education
255 Westminster Street
Providence, Rhode Island 02903

October 11, 2018

Dear Ms. Teixeira,

The University of Rhode Island Supplemental Nutrition Assistance Program-Education (URI SNAP-Ed) provides nutrition education programs for the low-income population of Rhode Island and professional development opportunities for those who work with this population. SNAP-Ed also encourages healthy habits for Rhode Islanders through policy, systems and environmental (PSE) work to make the healthy choice, the easier choice.

The 2009 Rhode Island Nutrition Requirements (RINR), which are stricter than the USDA standards, distinguish our state as a national leader in school nutrition and show our commitment to the well-being of our students. RINR also laid the groundwork for important nutrition-related PSE changes in the elementary and secondary schools. While the more stringent guidelines were challenging for many students, staff, and vendors at first, over time we have seen increased availability and acceptability of the more nutritious food items.

Rhode Island has the fifth highest overweight and obesity rate for youth ages 10-17 years old in the country, with 36.3% of youth being overweight or obese in 2016. Overweight and obesity is linked to several chronic diseases such as diabetes and heart disease; however, a healthy lifestyle of balanced nutritional intake and physical activity can help mitigate these outcomes. Many students consume two-thirds of their daily calories at school, and for many it may be the only meals they receive all day. Providing the healthiest meals possible is imperative to not only the weight of students, but also is likely to support positive cognitive, mental, and behavioral outcomes.


URI SNAP-Ed endorses the continuation of the current Rhode Island Nutrition Requirements that are in place in the Rhode Island elementary and secondary schools. We are not in favor of regressing to the minimum USDA standards.

Sincerely,

The University of Rhode Island SNAP-Ed Team


Sarah Amin, PhD, MPH


Kate Balestracci, PhD, RDN


Heidi Hetzler, MS, RDN


Paula Paolino, MAT, RDN


Jessica Meuleners, MS, RDN


Joanna Raymond, MS, RDN


Mary Parisi, RN


Andrea Nero, MS, RDN


Luz Posada


Melissa Pincince, MS, RDN, CDOE


Kelsi Chappell, MS, RDN


Natalie Weisfeld, MS, RDN


Fatima Tobar

Angela Teixeira
Board of Education
255 Westminster St
Providence, RI 02903
Angela.teixeira@ride.ri.gov

Comments in response to proposed regulation to replace RI Nutrition Requirements 2009 (RINR)

Sodexo, as the vendor that provides meals for nearly 24,000 students enrolled in the Providence Public Schools, has reviewed the public notice of proposed rulemaking regarding the “Regulations Governing Nutritional Requirements for Reimbursable Meals and Competitive Foods and Beverages; Limitations on Competitive Foods and Beverages at Meal Time”. Please consider the following comments regarding this proposed regulation:

Regarding Part 3.5.A.1. [On a weekly basis, at least one-half (1/2) of the “grain servings” in USDA meals must be one hundred (100%) per cent whole grain and the remaining “grain servings” must be whole grain rich.]; Sodexo/ Providence Public Schools strongly supports the intent of the existing requirement in RINR – 2009 that all grains served in USDA reimbursable breakfasts and lunches must be 100% whole grain products. We also recognize that a portion of the current standard (specifically, that all grain servings be 100% whole grain as opposed to “whole grain rich”) is cost prohibitive and difficult if not impossible to achieve in school meals. Numerous scientific studies and the medical community all agree that consumption of whole grains is conclusively linked to positive health outcomes. Rhode Island Department of Education lead a groundbreaking change by implementing stricter nutritional requirements for meals served to school children with the adoption of the Rhode Island Nutrition Requirements in 2007-2009 in an effort to combat the rising numbers of childhood health concerns such as diabetes and obesity. Several obstacles had to be overcome in the process of implementing RINR – namely, lack of availability of whole grain/ whole grain rich products, children’s preferences and acceptability of the whole grain products, and changes to recipes for school meals to name a few. Local vendors such as Calise bakery were quick to respond to the change and have worked in partnership with districts throughout the state to ensure that quality whole grain rich products are available to be served in school meals. Those same vendors continue to provide whole grain rich items that students have become accustomed to receiving as a part of a healthy reimbursable meal in school. Rhode Island should continue to be a leader in the nation in the area of child nutrition by requiring that all grain servings in USDA meals be whole grain rich with at least half of those servings being 100% whole grains. As we approach the 10 year anniversary of implementing RINR, it is notable that MOST children in RI schools have no experience with or memory of a time when processed grains were served in schools. Many children in the state receive most of their daily nutrition during the school year through the school meals programs and we are committed to supporting their healthy growth and development by serving the highest quality meals possible. We are also supportive of the overarching goal of simplifying language by referencing USDA regulations and further alignment of part 3.5.B (Competitive Foods requirements) with existing USDA regulations.

We appreciate this opportunity to comment,

Sodexo – Providence Public Schools

Comments on School Meal Guidelines

Dear RIDE,

I am a registered dietitian and have worked in community health for over 40 years. I have been on the Narragansett School wellness Committee for over 10 years and we have faced a constant battle to promote both high nutritional quality in our school meals and a foods that teach students about what a healthy diet looks like. Currently, I work for the Washington County Health Equity Zone, Healthy Bodies Healthy Minds, and sit on the Wellness Committees in 5 Washington County towns. There have been successes, but progress is slow and we have experienced frequent setbacks. I have a number of concerns both about what we are feeding our children in the school breakfast and lunch programs in Rhode Island, and what we are teaching them by the foods we provide.

These comments are based on my belief that school meals should be part of the nutrition education of students. It is not just my belief; according to Healthy People 2020 “public primary and secondary schools provide an unparalleled opportunity to influence the eating habits of millions of children. Government action to set strong and specific nutrition standards for school food can increase student fruit and vegetable intake”. Foods should not only meet healthy guidelines, but teach healthy habits. If the food item we are serving looks like an item that does not meet healthy guidelines when bought in the store, it does not help teach healthy eating habits. In fact, it may inadvertently “advertise” the less healthy item. Another concern is that the nutrition guidelines for school meals take into account the nutritional value of the foods as a group, that are available over the course of the week. Ex: the sodium limit is an average, but there may be high sodium foods included. I believe each food item (excluding condiments) should be a healthy choice. This is a teaching opportunity. Foods high in sugar are an issue as well as foods high in sodium. Allowing a sugary item which looks like a dessert or pastry (ex: chocolate chip muffin) does not help teach healthy eating habits.

I’m also concerned about the current guidelines for sodium and sugar set for school breakfast and lunch. The sodium guidelines state that the goal is to insure that students not exceed the 2,300 mg. per day, the daily tolerable upper intake set by the Dietary Guidelines. The school meals allow 575 mg. sodium for breakfast and 1070 for lunch. This adds up to 1645 leaving only 655 mg. for after school snacks and dinner. Should school lunch provide more sodium than is left for after school snack and dinner combined? Is it reasonable to think that children who ate the school breakfast and lunch will not exceed the 2,300 mg. sodium limit?

The World Health Organization and the American Heart Association recommend that children have no more than 6 tsp. (or 25 grams) added sugar per day due to research suggesting the role of added sugar in heart disease and other chronic diseases. The current limit for grain products of 7 grams sugar per ounce seems quite high if the goal is 25 grams or less of added sugar per day. Many of the breakfast “muffins”, “bars” or other “pastry type” items have between 15 and 22 total grams of sugar (for those containing fruit it may not all be added sugar, but not all of them contain fruit) which leaves little room to stay within guidelines. According to the school meal nutrition information provided on line by Aramark and Chartwells, the chocolate milk in the school lunch has between 8 and 11 grams of added

sugar depending on the brand used, coffee and strawberry milk have 6 grams each. If a child eats breakfast and lunch at school (most likely for our lowest income children) and chooses chocolate milk each time, they reach 22 grams of added sugar just from milk. Combine this with a breakfast muffin, pastry type item, or sweetened cereal and they have already exceeded the suggested limit for added sugar. The reduced sugar, sweetened cereals add between 6 and 9 grams of sugar, to the total. French toast sticks with syrup provide 21gms. of sugar, add flavored milk and the total is over the 25 grams for that one meal.

Reducing the requirements for whole grains has also become an issue nationally. As a dietitian I worked with patients to increase their whole grain intake as a part of dietary strategies to lower risk and work to control chronic disease. If our children learn, through school meals, to eat whole grain foods when they are young we can help reduce the risk of chronic diseases which are affecting children at increasingly younger ages. Currently USDA is asking to "relax" guidelines, which includes reducing the requirements for whole grains. If we revert back to the USDA standards we might significantly reduce the amount of whole grains in the food we serve our children.

The last issue I'd like to address is competitive foods. I'm concerned about the low nutritional value of some of the allowed competitive foods and the fact that I have seen vending machines operational during school meal service. I realize the vended items are supposed to be "smart snacks", but the vending companies don't always comply when loading the machines. Also, these foods may be competing with the fruits and vegetables available in the school meals. Fruits and vegetables are a much better choice nutritionally than baked chips. Food service companies cannot hope to teach healthy eating habits when vending items are available right in the cafeteria.

I strongly urge you to strengthen, not weaken our school meal standards. This is a health equity issue. Our lowest income children often eat two meals a day at school and they deserve meals of the highest possible quality and nutritional value. There seems to be a popular belief that healthy food is not appealing to children. In fact, although people have an innate preference for sweet, salty, and fatty foods, many other food preferences are learned. Children who are repeatedly exposed to a variety of fruits and vegetables learn to enjoy them. School meals which are creative, colorful and healthy can teach children to appreciate healthy foods and develop eating habits which will contribute to their long term health and wellness.

Thank you for this opportunity to voice my concerns.

Sincerely,

Cindy Buxton, MS, RDN

Healthy Bodies Healthy Minds
South County Health
14 Woodruff Ave., Suite #9
Narragansett, R.I. 02882
(401)788-2426

Village Green

A virtual charter school

135 Weybosset Street

Providence, RI 02903

Robert Pilkington, Ed.D.
Superintendent

Rochelle Baker, M.Ed., MSW
Executive Director

John Butler, Ph.D.
*Director of Teaching,
Learning and Research*

October 11, 2018

Dear Council Members:

I am writing to you today in support of the new RIDE nutrition policy with the exception of the 100% whole grain requirement.

As a founding contracted SFA of Revolution Foods, we desire healthy and good tasting/good textured grain products for our students. The current regulation is an "over-reach" and does not ensure palatability.

We do not seek to use "Wonder Bread" or "Sunbeam Bread" but the same type of nutritious wheat bread that you or I would buy at the supermarket for our families.

Having worked with Rev Foods, I find them to be the only food service company in 23 years of school and district leadership, which not only cares about nutrition but cares about taste and appearance of the food they serve children. This is a great company which is striving to put out a quality product and they deserve a chance to fully implement their menu ... the same menu which serves 80 Boston Public Schools.

We need the flexibility to serve healthy foods which are also appealing to the students.

Sincerely,



Dr. Robert Pilkington
Superintendent of Schools

www.vgonline.org • Tel: 401.831.2878 • Fax: 401.633.6199

Village Green Virtual Charter School does not discriminate in the enrollment of students, employment of administration, faculty and staff or use of volunteers for programs or activities on the basis of sex, race, creed, religion, color, national origin, age, veteran or military status, sexual orientation, gender expression, gender identity or disability.



CHARETTE HIGH SCHOOL

335 Westminster Street | Providence, RI 02903

Dr. Robert Pilkington
Superintendent
401.378.7007

Kathy Vespia, Ed.D.
Executive Director
401.595.2356

October 11, 2018

Dear Council Members:

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Sincerely,

Dr. Robert Pilkington
Superintendent of Schools

www.newcharterpvd.org

Charette High School does not discriminate in the enrollment of students, employment of faculty and staff or use of volunteers for programs or activities on the basis of sex, race, creed, religion, color, national origin, age, veteran or military status, sexual orientation, gender expression, or identity.

Carey, Steve

From: Teixeira, Angela
Sent: Thursday, October 11, 2018 6:05 PM
To: Wagner, Ken; Carey, Steve; Lopes, Sandra; Fabrizio, Sandra; Kechejian, Christine
Subject: Fwd: Public Comment re: 200RICR20253
Attachments: comment on RIDE food regs 10 11 18.pdf; ATT00001.htm

Sent from my iPhone

Begin forwarded message:

From: <rob@vgcs.org>
Date: October 11, 2018 at 5:02:24 PM EDT
To: Angela Teixeira <Angela.Teixeira@ride.ri.gov>
Cc: Keith Oliveira <koliveira@richarterschools.com>, Alyson Chow
<achow@revolutionfoods.com>, Kristen Bussenger <kbussenger@revolutionfoods.com>
Subject: Public Comment re: 200RICR20253

Angela:

Please find attached comment from Village Green and Charette.

Regards,

Rob

Robert Pilkington, Ed.D.
Superintendent & Founder
Village Green Virtual
135 Weybosset Street
Providence, Rhode Island 02903
Cell: 401.378.7007

This email and any files transmitted with it are confidential and intended solely for the individual(s) or entity(s) to whom addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. All e-mail sent to or from this address is subject to monitoring & review by Village Green Virtual.

Calise & Sons Bakery, Inc.

2 Quality Drive
Lincoln, RI 02865



401.334.3444 / 800.225.4737

Fax: 401.334.0938
www.calisebakery.com

October 11, 2018

To Whom It May Concern,

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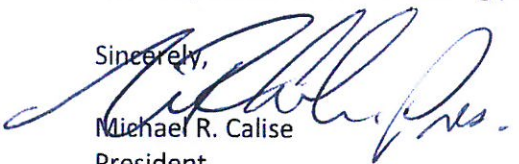
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Please contact myself or Mike Pritchard if you have any questions or require any additional information that may be useful to the hearing process.

Sincerely,


Michael R. Calise
President



October 11, 2018

Angela Teixeira
Board of Education
255 Westminster Street
Providence, RI 02903
angela.teixeira@ride.ri.gov

Dear Angela Teixeira:

I am writing to inform you of Rhode Island Food Policy Council's continued support for strong school meal and snack nutrition standards.

The Rhode Island Food Policy Council envisions a day when Rhode Island's food system will be a national model because of the strength of its local food system and its success at achieving community food security and optimal public health.

We oppose any efforts to weaken the updated healthy school meal and snack standards. School meals provide more nutritious fruits and vegetables and whole grains and contain less sugar, sodium and fat. We urge you to maintain these high nutrition standards for school meals and not amend the whole grain and caffeine requirements.

We appreciate the support that Rhode Island Department of Education has shown for protecting and improving access to quality nutrition for children, especially low income children, in this state.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Read".

Margaret Read
RI Food Policy Council
Policy Committee Co-Chair



October 11, 2018

Dr. Ken Wagner
Commissioner
Rhode Island Department of Education
255 Westminster Street
Providence, RI 02903

RE: Notice of Proposed Rulemaking 200-RICR-20-25-3

Dear Commissioner Wagner:

We are writing on behalf of the Providence Public School District (PPSD) Health and Wellness Committee and the City of Providence's Healthy Communities Office in support of 200-RICR-20-25-3, "Regulations Governing Nutritional Requirements for Reimbursable Meals and Competitive Foods and Beverages; Limitations on Competitive Foods and Beverages at Meal Time," as proposed by the RI Department of Education (RIDE) on September 11, 2018.

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We strongly encourage you to support 200-RICR-20-25-3 and thank you for your consideration.

Sincerely,

Robert Gondola, Jr.
Chair, Health and Wellness Committee
School Board
Providence Public School District

Ellen Cynar, MS, MPH
Director, Healthy Communities Office
City of Providence