

# Summary of Public Comment on the Regulations Governing Nutritional Requirements for Reimbursable Meals and Competitive Foods and Beverages; Limitations on Competitive Foods and Beverages at Meal Time.

September 26, 2018 & November 19, 2018

Commenter	Comment Type	Section #	Summary of Comments	Change to document or section	Suggested change to language or rationale for no change
Kristen Bussinger, Sr. Director of Partnerships at Revolution Foods	Supports	N/A		None	
	Opposes	N/A	Presented an overview of the services provided at Revolution Foods. References HHFKA and science-based research to support nutrition standards in school meals.	Yes	Repeal state-specific nutrition guidelines and adopt federal nutrition standards.
	Comment	N/A		none	
Chris Haskins, Superintendent at Paul Cuffee	Oppose	N/A	Referenced article 3.5A1 and suggested the use of whole grain rich foods rather than whole grain to better serve the students. He also stated that by creating nutritional guidelines separate from federal guidelines RI is unintentionally creating a barrier for new vendors.	Yes	Revise the proposed regulation to state that all grains served must be whole grain rich with no additional requirement regarding 100% whole grains.
	support	N/A	"Very much in support of the majority" of the guidelines with the exception of the guidelines surrounding whole grains.	None	

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Allison Chow, Revolution Foods	Oppose	N/A	Provided background on the services provided by Revolution Foods and her role within the company. References participation rates for days with 100% whole grain items vs. days with only whole grain rich items. Suggested RI should adopt only HFFKA Federal guidelines and remove the RI Nutritional Standards for NLSP.	Yes	Repeal state-specific nutrition guidelines and adopt federal nutrition standards.
	support	N/A		None	
Kathleen Swanson, Parent, Foster-Glocester	oppose	N/A		None	
	support	N/A	Opposed to allowing the use of caffeine in schools; supports the language in the proposed regulation, which prohibits caffeine. Feels that the regulations as proposed support the health curriculum already in place in schools. Does not feel that other school issues, such as attendance or profitability, should be addressed at the expense of student health, which would be a 'disservice to students'.	None	

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Rob Howard, VP of Sales, Revolution Foods	oppose	N/A	Suggested RI should adopt only HFFKA Federal guidelines and remove the RI Nutritional Standards.	Yes	Repeal state-specific nutrition guidelines and adopt federal nutrition standards.
	support	N/A		None	
Karin Wetherill, RIHSC, Community Member	oppose	N/A		None	
	support	N/A	Provided background on the proposed regulation and the distinction between reimbursable meal standards, as referenced by Revolution Foods, and the competitive foods standards referenced by Kathleen Swanson. Has seen the RI-specific regulations successfully implemented and well-received in schools. Fully supports the proposed regulations, as written.	None	
Rosanna Campbell, Mother, Teacher	oppose	N/A		None	

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	support	N/A	Supports regulation in general. Feels that children cannot perform their best without adequate nutrition. Explained her concern with the current meal choices, questioning how the proposal would meet the nutritional needs of children while also addressing food waste concerns.	None	
Kelly Swanson, Parent	oppose	N/A		None	
	support	N/A	Feels that RI school lunches have made significant positive progress over the years. Has serious concerns over the idea of offering caffeine in schools. Strongly opposes current regulations being rolled back and supports RI Nutritional Regulations as is.	None	
Megan Tucker, American Heart Association	oppose	N/A		None	
	support	N/A	Strongly supports proposed regulations. Spoke about the standards having been developed through a collaborative process with various stakeholders	None	

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			throughout the state over the course of the last decade. Plans to continue work with nutrition partners throughout the state to submit written comment in support of the proposed regulations.		
Bridget Almon, Foster-Glocester Business Manager/Parent	oppose	N/A	Voiced concerns with nutrition programs in schools not being financially viable. Feels that students do not like the current food choices and choose not to participate in school meals as a result. Supports eliminating the RI Nutritional Regulations and adopting only HHKFA Federal Regulations, which she feels will encourage higher participation.	yes	Repeal state-specific nutrition guidelines and adopt federal nutrition standards.
	support	N/A		None	
Paula Paolino	oppose	N/A		None	
	support	N/A	Gave background on SNAP-Ed's role in schools and their role in the collaborative process that was put in place to develop the current nutrition standards, which the proposed regulations	None	

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			support. Strongly opposes any 'roll-back' in the current nutrition standards. Fully supports the proposed regulations, which are based on the dietary guidelines and were arrived at through the support and collaboration of a variety of partners.		
Michael Barnes, Superintendent Foster/Glocester Schools	oppose	N/A	Discussed the burden on school districts when managing state regulations that differ from federal regulation, particularly when seeking the services of outside vendors, such as foodservice management companies, who operate nationally according to federal standards. Feels that wherever possible schools should be held only to federal guidelines and not have additional state guidelines imposed. Supports eliminating the RI Nutritional Regulations and adopting only HHKFA Federal Regulations.	Yes	Repeal state-specific nutrition guidelines and adopt federal nutrition standards.
	support	N/A		None	

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## ***Additional Comments made on November 19, 2018***

Commenter	Comment Type	Section #	Summary of Comments	Change to document or section	Suggested change to language or rationale for no change
Karin Wetherill, RIHSC, Community Member	Supports	N/A	Strongly supports the proposed adoption of the school nutrition standards. Discussed the improvements in the quality of food she has seen in the school setting and also the opportunity the standards have given to provide a healthy lifestyle.	None	
	Opposes	N/A		None	
	Comment	N/A		None	
Ellen Cynar, Director of the City of Providence Healthy Communities Office	Oppose	N/A		None	
	Support	N/A	Supports due to the fact that the majority of students are free/reduced eligible and the school meals are a critical source of calorie and nutrition for their day to day food security and may be the only	None	

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			source of food they are receiving.		
Amy Nunn, Director of RI Public Health Institute, Associate Professor at Brown	Support	N/A	Supports to maintain and continue to pursue more public health oriented regulations that promote healthier eating in our schools. Federal guidelines are insufficient in these regards and RI should be pursuing school lunch policies that go above and beyond the federal standards.	None	
	Oppose	N/A		None	
	Comment	N/A		None	
Eliza Cohen, RI Public Health Institute	Support	N/A	Supports in order to provide high quality food to our students who are in need of nutritious meals. Supports to adopt regulations to maintain strong standards in RI and continue the work of the administration in prioritizing healthy food access through the strategic food plan.		



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	Oppose				

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Dr. Robert Pilkington, Supt. of Village Green Virtual Charter	Supports	N/A		None	
	Opposes	N/A	Opposed specifically to 100% whole grain required. This specific requirement is “over reach” and does not ensure palatability.	Yes	Eliminate 100% whole grain requirement.
Dr. Robert Pilkington, Supt. of Charette Charter School	Opposes	N/A	Opposed specifically to 100% whole grain required. This specific requirement is “over reach” and does not ensure palatability.	Yes	Eliminate 100% whole grain requirement.
	support	N/A		None	
Michael Calise, President of Calise Bakery	Support	N/A	Cites fact that this RI business worked with public schools and major vendors to formulate great lasting bread and rolls that meet these whole grain requirements.	None	

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	Oppose	N/A		None	
Providence PS Robert Gondola, Jr. Chair, Health and Wellness Committee, School Board Ellen Cynar, Director Healthy Communities Office	Support	N/A	Because Providence students rely on school meals PPSPD supports nutrition standards that foster a healthy educational environment and in alignment with health education	None	
	Oppose	N/A		None	
Combined Student Alliance for a Healthier RI of AHA. Kids Count, Farm Fresh RI, RI Community Food Bank, RI Academy of Nutrition & Dietetics, Cancer Action Network, Providence Healthy Communities Office, eat drink RI, Oasis Intl Providence, RI Medical Society, Progresso Latino, RIAHPRD, A Sweet Creation	Support	N/A	The proposed regulation will maintain high nutrition standards for meals, foods, and beverages sold in schools. The existing standards have been implemented for almost a decade and are engrained in school wellness policies. Products have been reformulated to meet the standards long ago. Providing healthy food teaches good habits.	None	

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	Oppose	N/A		None	
Dr. Allison Tovar, Associate Professor Dept. of Nutrition and Food Sciences URI/ Community Nutrition & Childhood Obesity Prevention Research Group	Support	N/A	Taken with federal requirements the proposed regulation will maintain high nutritious standards for school meals. Schools have been implementing these standards for the better part of a decade and have been written into district wellness plans. Giving children healthy food at school teaches good eating habits. We know that changing the environment is much easier than telling children what to eat and not to eat.	None	
	Oppose	N/A		None	
Jon Anderson, Paul Cuffee School and	Oppose	3.5(A) (1)	Any decision to approve 3.5(A)(1) would be arbitrary, capricious, and contrary to law. Citing for bases in support of objection: First RIDE failed to conduct mandated analysis of the impact on schools. Second, the regulatory analysis of the Proposed Rule does not satisfy the RI APA. Third, the	Yes	Change to document requests taking proposed rule 3.5(A)(1) and refer it back to RIDE for further study

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			Proposed Rule creates barriers to the RI market for food service to the detriment of Paul Cuffee School and its students. Finally, this rule disproportionately affects students at PCS.		
	Support	N/A		None	
Cindy Buxton MS RDN Healthy Schools Healthy Minds	Oppose	N/A	Even with these standards, students are exposed to more added sugar and sodium; and competitive vending machine foods have low nutritional value.	Yes	Strengthen these requirements. (make stricter)
	Support	N/A		None	
Sodexo- Providence	Support	N/A	Strongly supports existing requirements. Obstacles needed to be overcome regarding availability of whole grain products but were overcome by working with local vendors. RI should continue to be a leader by requiring whole grain-rich with half of grains being 100% whole grain.	None	

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	Oppose	N/A		None	
Revolution Foods Kim Doyle, Senior Director of Nutrition and Compliance	oppose	3.5(A)(1)	Applauds many of the requirements put forth including prohibition of artificial sweeteners, sugar alcohols, and caffeine. However, recommend that the grain requirement be modified to be consistent with USDA standards. Cites the fact that the Dietary Guidelines for Americans recommend that half of grains come from whole grains	yes	Suggested change – 3.5(A)(1) to read: “All grain servings in USDA meals must be whole grain-rich.”
	support	N/A		None	
University of RI, SNAP-Ed Team	oppose	N/A		None	
	support	N/A	The 2009 RINR distinguish RI as a national leader in school nutrition. RI has the fifth highest overweight and obese rate for youth aged 10-17 in US. Providing healthiest meals possible is imperative for weight	None	

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			but also likely supports cognitive outcomes. URI-SNAP Ed endorses the continuation of the current RINR		
	oppose	N/A			
Margaret Read, Policy Committee Co-Chair RI Food Policy Council	support	N/A	Opposes any efforts to weaken the updated healthy school meal and snack standards	None	

### ***Additional Written Comments made After October 11, 2018***

Commenter	Comment Type	Section #	Summary of Comments	Change to document or section	Suggested change to language or rationale for no change
Michael Calise, President of Calise Bakery	Supports	N/A	Cites fact that this RI business worked with public schools and major vendors to formulate great lasting bread and rolls that meet these whole grain requirements..	None	

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	Opposes	N/A		None	
	Comment	N/A		None	
Cindy Buxton MS RDN Healthy Schools Healthy Minds	Oppose	N/A	Even with these standards, students are exposed to more added sugar and sodium; and competitive vending machine foods have low nutritional value.	None	Strengthen these requirements. (make stricter)
University of RI, SNAP-Ed Team	Support	N/A	The 2009 RINR distinguish RI as a national leader in school nutrition. RI has the fifth highest overweight and obese rate for youth aged 10-17 in US. Providing healthiest meals possible is imperative for weight but also likely supports cognitive outcomes. URI-SNAP Ed endorses the continuation of the current RINR	None	
RI Public Health Institute Amy Nunn, Director of RI Public Health Institute, Associate Professor at Brown	Support	N/A	The proposed regulation which would maintain high standards for school meals is an important measure to ensure healthy food for our children and preventing dietary disease Since so many low income children depend on school meals for their nutrition, maintaining high quality nutritious food is essential for the children who need it most. Notes that the Governor's	None	



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			Strategic Food Plan recognizes school meals as a vital piece of food security and emphasizes that RI leads the nation in nutrition requirements.		
	Oppose	N/A		None	
	Comment	N/A		None	
Providence PS Robert Gondola, Jr. Chair, Health and Wellness Committee, School Board Ellen Cynar, Director Healthy Communities Office	Support	N/A	Because Providence students rely on school meals PPSPD supports nutrition standards that foster a healthy educational environment and in alignment with health education	None	
	Oppose	N/A		None	
Dr. Allison Tovar, Associate Professor Dept. of Nutrition and Food Sciences URI/ Community Nutrition & Childhood Obesity Prevention Research Group	Support	N/A	Taken with federal requirements the proposed regulation will maintain high nutritious standards for school meals. Schools have been implementing these standards for the better part of a decade and have been written into district wellness plans. Giving	None	

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			children healthy food at school teaches good eating habits. We know that changing the environment is much easier than telling children what to eat and not to eat.		
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