

Attachment H. ID FNS-2022-0043-93129 –  
Public Comment Example 2

## USDA Public Comment

**Submitted by:** Nourish Colorado

**Re:** Proposed Rule; [Child Nutrition Programs: Revisions to Meal Patterns Consistent with the 2020 Dietary Guidelines for Americans](#)

**Federal register:** [7 CFR Part 210, 215, 220, 225, 226](#)

**Date:** May 10th, 2023

To Whom It May Concern,

Thank you for the opportunity to comment on *Child Nutrition Programs: Revisions to Meal Patterns Consistent with the 2020 Dietary Guidelines for Americans*. This comment is submitted by Nourish Colorado, a Colorado non-profit organization, with a mission to act as changemakers who strengthen connections with and between farms, ranches, and communities so that all Coloradans have equitable access to fresh, nutritious foods. Specifically, our commenting team included: Jessica Wright, Director of Healthy Food in Institutions; Rebecca Robbins, Farm to Institution Program Manager; Taylor Frederick, Culinary Programs Manager; and Becca Gredone, Legal Analyst. Combined, we have years of experience in institutional, donation, and restaurant kitchens, and with the federal Child Nutrition Programs. Due to our educational and personal experiences, we deeply understand the importance Child Nutrition Programs play in ensuring our nation's children and youth are receiving the proper nourishment needed to grow and be successful individuals. We also have a considerable understanding of the challenges food service operators battle when it comes to meeting meal pattern, procurement, and professional standards regulations. And we have experience with the challenges food service operators face related to budgetary constraints for food, labor, and equipment, and the varied student palettes that call forth a multitude of different dietary preferences and requirements.

Attached you can find, 1. our public comment, organized systematically as written by the proposed rule and its specific questions, as well as, 2. a Meal Crediting Feasibility Study, which corresponds with answers to the proposed questions.

Please reach out if you have any questions or concerns. You can contact Nourish Colorado through Jessica Wright ([jessica@nourishcolorado.org](mailto:jessica@nourishcolorado.org)). Thank you!

Jessica Wright



Director of Healthy Food in Institutions  
Nourish Colorado



Proposed Rule: [Child Nutrition Programs:  
Revisions to Meal Patterns Consistent with the 2020 Dietary Guidelines for Americans](#)  
Federal register: [7 CFR Part 210, 215, 220, 225, 226](#)

Nourish Colorado: Public Comment  
Due: 10 May 2023

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## 1. Background

## 2. Added sugars

- a. **USDA is proposing product-specific limits on the following foods to improve the nutritional quality of meals served to children: grain-based desserts, breakfast cereals, yogurt, and flavored milk. Do stakeholders have input on the products and specific limits included in this proposal?**
- b. **Do the proposed implementation timeframes provide appropriate lead time for food manufacturers and schools to successfully implement the new added sugars standards? Why or why not?**
- c. **What impact will the proposed added sugars standards have on school meal menu planning and the foods schools serve at breakfast and lunch, including the overall nutrition of meals served to children?**

The product-based approach would provide greater ease of operation for SFAs. The product-based approach is already being used in the Child and Adult Care Food Program (CACFP), and it is working well. Using this approach would be effective because it would align with another federal CN program and reduce administrative burden. The proposed timeline for product-based limits is fine, especially because this is already in place with CACFP.

The proposed weekly added sugars limit will negatively impact school meal menu planning and the nutritional quality of food, we do not support this change. Since many of the offered breakfast items tend to be higher in sugar, product based limits are necessary to limit breakfast sugar levels, compared to weekly sugar limits. We have even received direct feedback from students who are skeptical about school breakfast options being considered healthy, with items like funnel cake fries being specifically called out. Focusing on product-based limits creates ease of operation and supports students as they become more aware of what is being promoted as “healthy.” It is long overdue that the meal pattern requirements reflect the [2020-2025 Dietary Guidelines for Americans](#), which recommends that “a healthy dietary pattern limits added sugars to less than 10% of calories per day” and using the product-based approach will support this.

If added sugars are to be limited in the National School Lunch and Breakfast Programs, we encourage the USDA to consider a stance on limiting the usage of artificial sweeteners in food and beverage products. Even though the Food and Drug Administration has five approved artificial sweeteners for consumption, there is a growing body of peer-reviewed research suggesting that artificial sweeteners could be harmful to the human body. For example,

research shows that “...intake could increase the risk of all-cause mortality<sup>1</sup>...” and that artificial sweeteners may alter the gut microbiome in an unfavorable way<sup>2</sup>, which could lead to chronic health conditions such as Non-alcoholic Fatty Liver Disease<sup>3</sup>. Research also identifies that “...their consumption is controversial owing to their effects on health ranging from mild headache to dreadful cancer risks<sup>4</sup>.” The [2020-2025 Dietary Guidelines for Americans](#) also states that, “It should be noted that replacing added sugars with low- and no-calorie sweeteners may reduce calorie intake in the short-term and aid in weight management, yet questions remain about their effectiveness as a long-term weight management strategy.”

### 3. Milk

*For the final rule, USDA is considering two different milk proposals and invites comments on both. These two proposals are included in the regulatory text as Alternative A and Alternative B:*

*Alternative A: Proposes to allow flavored milk (fat-free and low-fat) at school lunch and breakfast for high school children only, effective SY 2025-2026. Under this alternative, USDA is proposing that children in grades K-8 would be limited to a variety of unflavored milk. The proposed regulatory text for Alternative A would allow flavored milk for high school children only (grades 9-12). USDA also requests public input on whether to allow flavored milk for children in grades 6-8 as well as high school children (grades 9-12). Children in grades K-5 would again be limited to a variety of unflavored milk. Under both Alternative A scenarios, flavored milk would be subject to the new proposed added sugars limit.*

*Alternative B: Proposes to maintain the current standard allowing all schools to offer fat-free and low-fat milk, flavored and unflavored, with the new proposed added sugars limit for flavored milk.*

- a. **The *Dietary Guidelines* state that “consuming beverages with no added sugars is particularly important for young children.” As discussed above, one of the two proposals USDA is considering would limit milk choices in elementary and middle schools (grades K-8) to unflavored milk varieties only at school lunch and breakfast. To reduce young children's exposure to added sugars and promote the more nutrient-dense choice of unflavored milk, should USDA finalize this proposal? Why or why not?**
  - i. **Respondents that support Alternative A are encouraged to provide specific input on whether USDA should limit flavored milk to high schools only (grades 9-12) or to middle schools and high schools only (grades 6-12).**
    - 1. **If Alternative A is finalized with restrictions on flavored milk for grades K-8 or K-5 in NSLP and SBP, should USDA also pursue a similar change in SMP and CACFP? Are there any special considerations USDA should keep in mind for SMP and CACFP operators, given the differences in these programs compared to school meal program operators?**

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<sup>1</sup> <https://www.mdpi.com/2072-6643/14/18/3742>

<sup>2</sup> <https://www.nature.com/articles/s41591-022-02063-z>

<sup>3</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7257251/>

<sup>4</sup> <https://www.biotech-asia.org/vol18no2/artificial-sweeteners-and-their-health-implications-a-review/>

- b. What feedback do stakeholders have about the current fluid milk substitute process? USDA is especially interested in feedback from parents and guardians and program operators with firsthand experience requesting and processing a fluid milk substitute request.**

Alternative A, which allows only unflavored milk for grades K-5, and allows flavored and unflavored milk for grades 6-12, would help lessen sugar consumption among our scholars (particularly if the added sugar product-based approach proposed option is accepted).

The ADD SOY Act, introduced as [H.R.1619](#) into the 118th Congress by [Representative Carter](#), also supports a strong change related to this section of the proposed rule. The bill would require schools to provide fluid milk substitutes upon request of a student or parent/guardian and makes soy milk available to children in schools who need an alternative to cow's milk. Representative Carter's press release states, "This is especially important because large numbers of minority children, particularly Black, Latino, Native American, and Asian-American, are lactose intolerant. These children experience adverse health effects simply because, in practice, dairy is the only type of milk offered in schools." Carter also stated, "It is abundantly clear that the current milk substitute system that USDA employs is delivering detrimental impacts on BIPOC school children...too many children who cannot safely or comfortably consume dairy are being forced to accept containers of cow's milk on their lunch trays. My ADD SOY Act ensures the health and nutritional needs of all our nation's students are met. America needs to embrace its diversity at the lunch counter." The USDA should also work to implement these fluid milk substitutions changes to support equitable meals being available to all students, especially if this bill does not pass through Congress.

It is also worth noting that studies have shown that about 68% of the world's population has lactose malabsorption<sup>5</sup>. We recommend continuing to explore options where instead of requiring fluid milk as its own standalone meal component it is instead moved into the same meal component as protein (currently M/MA).

## **4. Whole grains**

*For the final rule, USDA is considering two different options and invites comments on both:*

- *Maintaining the current requirement that at least 80 percent of the weekly grains offered are whole grain-rich, based on ounce equivalents of grains offered; or*
- *Requiring that all grains offered must meet the whole grain-rich requirement, except that one day each school week, schools may offer enriched grains.*

- a. Which option would be simplest for menu planners to implement, and why?**  
**b. Which option would be simplest to monitor, and why?**

Based on feedback from SFA's that we work with, it appears that maintaining the current requirement is preferred. Instead of it being either option, could both options be provided and then the SFA chooses which one they are following for menu planning? Both options get to the same goal, just worded slightly differently, and it may be easier to let our operators choose which option is the easiest for them to implement. However, whichever option is selected, it is important that the exemption form remains in place and we recommend that ALL states offer this exemption. It may also be worth considering a limit on the number of products a whole-grain exemption can be filed for.

## 5. Sodium

- a. **USDA plans to recommend (but not require) sodium limits for certain products, such as condiments and sandwiches, to further support schools' efforts to procure lower sodium products and meet the weekly limits.**
  - i. **For which products should USDA develop best practice sodium limits?**
  - ii. **What limits would be achievable for schools and industry, while still supporting lower-sodium meals for children?**
- b. **Does the proposed implementation timeframe provide appropriate lead time for manufacturers and schools to successfully implement the new sodium limits?**
- c. **Do commenters agree with USDA's proposed schedule for incremental sodium reductions, including both the number and level of sodium reductions and the timeline, or suggest an alternative? Why?**

Neither of these two proposed options are ideal. With all of the challenges SFAs are currently facing post-COVID, the 2025-2026 school year is too soon for stricter regulations on sodium (arguably the most restrictive nutrient standard out of the four). SFAs need to be focusing on feeding students nourishing food and getting back to some sort of normalcy before more restrictions are placed on them, particularly when supply chains still aren't running smoothly. With this said, we strongly believe that sodium requirements need to be removed altogether as a meal pattern requirement. Having sodium restrictions, places focus on processed foods and beverages that aren't nourishing and lack palatability. Having these sodium restrictions also makes it more difficult for SFAs to cook from scratch.

Perhaps USDA could allow an exemption from the sodium requirements if schools cook a certain percentage of their meals from scratch? However, this would require a definition of scratch-cooking to be developed. If we moved to a simpler meal crediting system that focused on whole and fresh ingredients and foods, rather than a system that focuses on isolated nutrients, school nutrition operations would be more streamlined and have less administrative burden. They could focus on what they're meant to be doing - feeding our scholars wholesome, nutritious food to fuel their bodies and minds!

We align with the School Nutrition Association in that schools should be able to exclude naturally occurring sodium in future sodium reductions.

## 6. Menu planning options for American Indian and Alaska Native students

*USDA will consider the following questions when developing the final rule and may incorporate changes to this proposal based on public input. Additionally, in the final rule, USDA may consider additional menu planning options for schools that are tribally operated, are operated by the Bureau of Indian Education, or serve primarily American Indian or Alaska Native children, based on public input.*

- a. **USDA requests public input on additional menu planning options that would improve the school meal programs for American Indian and Alaska Native children. Are there other specific areas of the school meal pattern that present challenges to serving culturally appropriate meals for American Indian and Alaska Native children, specifically regarding any regulatory requirements in [7 CFR 210.10](#) and [220.8](#)?**

*This is not our area of expertise, however we fully support the process of making it easier to include culturally relevant meals and foods into all school meal programs, including programs for American Indian and Alaska Native children.*

## 7. Traditional foods

*USDA recognizes that this change is just one part of a larger effort to support the service of traditional foods in school meals. USDA greatly appreciates public input on this topic, particularly from members of American Indian or Alaska Native communities.*

- a. **USDA has provided guidance <sup>[81]</sup> on crediting certain traditional foods. Are there any other traditional foods that schools would like to serve, but are having difficulty serving? If so, what specific challenges are preventing schools from serving these foods?**
- b. **Which traditional foods should USDA provide yield information for and incorporate into the *Food Buying Guide* ?**
  - i. **Is “traditional foods,” as described in the Agriculture Improvement Act of 2014, as amended ([25 U.S.C. 1685\(b\)\(5\)](#)), an appropriate term to use, or do stakeholders recommend a different term?**

*The Traditional Foods proposed change would be an effective step towards allowing for equitable meal planning. We’d like to mention that this proposal reinforces the need for a new approach to crediting school meals. The current model (i.e. current meal pattern regulations) puts SFAs in a place where they have to identify certain ingredients as “creditable.” This makes it very hard to increase food sovereignty nationwide because SFAs are forced to fit inside specific parameters. With a new crediting model that focuses on ingredients and whole foods, rather than isolated nutrients, this proposed rule would be easier and more streamlined to offer culturally relevant and traditional foods in school meal programs.*



## 8. Afterschool snacks

*USDA proposes to align NSLP snack standards for school-aged children at [7 CFR 210.10\(o\)](#) with the CACFP snack requirements, as required by statute.*

- a. **USDA seeks comment on this proposed change, found in [7 CFR 210.10\(o\)](#) of the proposed regulatory text.**

Aligning the NSLP Afterschool Snack standards with CACFP would be helpful and make menu planning easier. However, separating out fruits and vegetables into two separate components would create more administrative burden, particularly since supply chains are still volatile. It would be best to keep them as one combined category.

## 9. Substituting vegetables for fruits as breakfast

*USDA proposes to continue to allow schools to substitute vegetables for fruits at breakfast, but changes the vegetable variety requirement. Under this proposal, schools that substitute vegetables for fruits at breakfast more than one day per school week would be required to offer a variety of vegetable subgroups. In other words, schools that substitute vegetables more than one day per school week would be required to offer vegetables from at least two subgroups.*

- a. **USDA seeks comment on this proposed change, found in [7 CFR 220.8\(c\)\(2\)\(ii\)](#) of the proposed regulatory text.**

We support SNA and their comment: “SNA recommends offering permanent flexibility to allow schools to offer vegetables in place of fruit at breakfast, without having to meet vegetable subgroup requirements. Fruits will continue to be the popular choice for school breakfast sides, but as schools work to increase variety on breakfast menus, they should have the option to substitute a vegetable, without the added complexity of having to monitor vegetable subgroups. Combined with the request to allow meat/meat alternates to be served in place of the entire grain component a maximum of three times per week, this proposed rule will help reduce the overall sugar content of school breakfasts.”

We would also like to note that the breakfast meal pattern is currently confusing where M/MA count as a Grain and they have meal pattern components but have to offer 4 items within those components. Streamlining breakfast to align with the NSLP meal pattern is something worth looking at.

## 10. Nuts and seeds

*USDA proposes to allow nuts and seeds to credit for the full meat/meat alternate (or protein source) component in all child nutrition programs and meals. This proposal would remove the 50 percent crediting limit for nuts and seeds at breakfast, lunch, and supper.*

- a. **USDA seeks comment on this proposed change, found in [7 CFR 210.10\(c\)\(2\)\(i\)\(B\)](#), [220.8\(c\)\(2\)\(i\)\(B\)](#), [225.16\(d\)\(2\)](#), [225.16\(e\)\(5\)](#), [226.20\(a\)\(5\)\(ii\)](#), and [226.20\(c\)\(2\)](#) of the proposed regulatory text.**

The proposal to allow nuts and seeds to count as 100% of the meat/meat alternate requirement would be a positive change to meal patterns. Nuts and seeds can be a less expensive protein source to menu, compared to animal-based proteins, and it is a helpful item to menu for students with specific dietary preferences, patterns, and/or restrictions.

## **11. Competitive foods–hummus exemption**

*USDA proposes to add hummus to the list of foods exempt from the total fat standard in the competitive food, or Smart Snack, regulations. Hummus would continue to be subject to the saturated fat standard for Smart Snacks. This change would allow hummus, which is already permitted as part of a reimbursable school meal, to also be sold as a Smart Snack.*

- a. USDA seeks comment on this proposed change, found in 7 CFR 210.11(a)(7) and 210.11(f)(2) of the proposed regulatory text.**

Adding hummus to the exempt list for total fat would be helpful for menu planning and provide a highly desired a la carte option for students. Hummus is an inexpensive and wholesome source of nutrition and satisfies numerous dietary patterns and preferences.

## **12. Professional standards**

- a. Is it reasonable to allow medium and large local educational agencies to substitute 10 years of school nutrition program experience for a bachelor's or associate's degree when hiring a school nutrition program director? USDA requests that commenters explain their response. Based on public input, USDA may adjust the number of years of school nutrition program experience required to substitute for a degree.**
- b. Should USDA also consider allowing medium and large local educational agencies to substitute other types of experience, such as experience in other food service sectors, for a bachelor's or associate's degree when hiring a school nutrition program director? USDA requests that commenters explain their response. Based on public input, USDA may adjust the type of experience allowed to substitute for a degree.**
- c. How often do State agencies and schools anticipate using the hiring flexibility proposed in this rulemaking?**
- d. What strategies do local educational agencies currently use to recruit qualified school nutrition program directors? USDA requests input on successes and challenges local educational agencies of any size have experienced in their recruitment efforts.**

We fully support the Professional Qualifications proposed rule. This proposal increases equity in the school nutrition profession. Many school nutrition professionals enter into this space since it is a job that offers good benefits and a decent working schedule. If individuals have been in this profession for 10+ years, they know a considerable amount more than someone who may have a college degree, but no experience in school nutrition. College is also expensive and offers other inequitable barriers; it is often unattainable for many. Considering this, this proposed rule will offer numerous opportunities for people

who are committed to school nutrition and want to advance in their career, but are not currently eligible for higher paying and achieving positions since the current standards are so confining.

### 13. Buy American

#### a. Limited exceptions to the Buy American requirement

*USDA's intention is to ensure that the Buy American provision continues to support the mission of the child nutrition programs, which is to serve children nutritious meals and support American agriculture, through school food authority purchases of domestic commodities or products "to the maximum extent practicable." Using available data, USDA proposes to set a 5 percent limit on non-domestic foods that can be purchased.*

- i. **Is the proposed 5 percent ceiling on the non-domestic commercial foods a school food authority may purchase per school year a reasonable ceiling, or should a different percentage be used? Would the 5 percent cap encourage those school food authorities using exceptions to reduce the amount of non-domestic products they purchase? USDA requests that respondents include justification and reasons behind their response.**
- ii. **How feasible would tracking and documenting the total amount of non-domestic food purchases be? Would purchasing and record keeping processes need to be altered? Does the documentation of total non-domestic purchases alleviate the burden associated with documenting each limited exception that is used? And any additional information about how school food authorities would document the total amount of non-domestic food purchases versus total annual food purchases.**

We highly recommend that the USDA maintain the Buy American rule that is already in place. Unfortunately, implementing a 5% ceiling on Buy American exceptions would be too burdensome for SFAs to comply with—especially with the current supply chain disruptions. If this rule was enacted, who would be tasked with tracking to ensure compliance? We cannot expect SFAs, especially smaller ones, to handle this burden. Generally, we would encourage the USDA to implement regulations that make it easier for SFAs.

Even though, in theory, the Buy American Provision acts as a tool to encourage and require SFAs to purchase locally grown (or at least domestically grown) food products and the 5% ceiling could enforce this restriction even further, schools shouldn't be burdened with this additional compliance measure. We don't have the research and data available to ensure that this proposed rule wouldn't disproportionately harm underserved communities. We don't know the answers to questions such as: Which kinds of schools are currently going over 5% on their Buy American exceptions...is it mostly smaller, underfunded schools that are already struggling to meet the needs of their students? What kinds of foods are being purchased with exceptions...is it mostly culturally relevant foods that cannot be found domestically? Therefore, this proposed change should not be enacted.

However, we do encourage the USDA to create a database that maintains enhanced levels of documentation in order to increase domestic and local procurement by SFAs. The USDA should be providing proper tracking devices and data collection resources that are easy for schools to use and language/culturally equitable. Required support will likely also include providing updated technology for SFAs to use that has mapping tools and technical assistance to help schools find local distributors and producers that meet their needs and to report their purchases. One specific tool that could be helpful for SFAs is if the USDA created a database of products that are commonly sourced from outside of the United States (e.g. tuna, mandarin oranges, bananas, etc.) with documentation for those products based on vendors.

SFAs already have limited time and need to be focusing on what they are there to do - feed kids. Therefore, school food service operators should not have to take the limited time they already have to locate and secure documentation for this regulation.

#### b. Exception documentation and reporting requirements

*Since school food authorities will only maintain documentation showing that no more than 5 percent of their total annual commercial food costs were for non-domestic food purchases using one of the two limited exceptions, rather than documenting each use of an exception and given that school food authorities will have flexibility in how they maintain documentation, USDA invites public input on this proposal in general, and requests specific input on the following question.*

- i. **Is the proposal to require school food authorities to maintain documentation showing that no more than 5 percent of their total annual commercial food costs were for non-domestic foods feasible and is the regulatory language clear enough for school food authorities and State agencies to implement and follow?**
- ii. **For oversight purposes, USDA is considering requiring school food authorities maintain an attestation statement to attest that any nondomestic food item purchased under the 5 percent cap met one of the two limited exceptions. Would this approach assist school food authorities with the burden associated with documentation requirements? Does it help ensure that any non-domestic food purchase under the 5 percent cap was only a result of utilizing one of the current limited exceptions that USDA proposes to codify through this rulemaking?**

Again, this proposes too great of a burden on operators. It is not feasible for SFAs to maintain this documentation.

#### c. Procurement procedures

*This proposed rule would require school food authorities to include the Buy American provision in documented procurement procedures, solicitations, and contracts for foods and food products procured*

*using informal and formal procurement methods, and in awarded contracts. State agencies would verify the inclusion of this language when conducting reviews.*

- i. **USDA seeks comments on this proposal, found at [7 CFR 210.21\(d\)\(3\)](#) and [220.16\(d\)\(3\)](#) of the proposed rule.**

N/A

d. Definition of “substantially”

- i. **Does the proposed definition of “substantially using agriculture commodities that are produced in the United States” meet the intent of the Buy American requirements? If not, what other suggestions do stakeholders have for the definition?**

Yes, the proposed definition of “at least 51% from American products” for the term, “substantially using agriculture commodities that are produced in the United States” meets the intent of the Buy American requirements since this is the language provided in the congressional report from the original legislation. It also seems logical that “substantially” would mean over 50% of the product. It is important that one, succinct definition is adopted to ensure clarity and ease of use for SFAs that are required to comply with this rule.

Although the program intends to fully support domestically grown products, having a requirement that 100% of the final product consists of agricultural commodities that were grown domestically would be too great of a burden on SFAs because the market/infrastructure is not currently in place to make this an easy procurement process.

e. Clarification of requirements for harvest farmed and wild caught fish

*USDA proposes adding language to the regulations to codify how Buy American applies to fish and fish products in the school lunch and breakfast programs.*

- i. **USDA seeks comments on this proposal, found at [7 CFR 210.21\(d\)\(6\)](#) and [220.16\(d\)\(6\)](#) of the proposed rule.**

This proposal should be enacted with the suggestion that USDA manages the database versus requiring SFA's to figure it out.

## 14. Geographic preference

*USDA is proposing to expand geographic preference to allow locally grown, raised, or caught as procurement specifications for unprocessed or minimally processed food items.*

- a. **Do respondents agree that this approach would ease procurement challenges for child nutrition program operators interested in sourcing food from local producers?**

Farm to school programs could be made much stronger and simpler to navigate by allowing SFAs to use local product specifications, instead of only a geographic preference. This change in SFA procurement guidelines would make it easier for schools to source local food and farm products for their meal programs, unlike the current “geographic preference” option which is found to be burdensome and confusing to implement.

**b. Do respondents agree that this approach would encourage smaller-scale producers to submit bids to sell local foods to child nutrition programs?**

Our commenting team is in full support of the Expanded Geographic Preference proposed rule. Currently, as the regulation stands, it is incredibly complicated and burdensome for SFAs to navigate the “geographic preference” requirement when seeking bids. For example, if an SFA wants a local product, they have to dance around the “geographic preference” requirement and spend time developing specifications that get them the product they want (e.g. harvested within a certain time frame, identifying a certain operation/farm name, etc.). This is particularly an issue for Food Service Directors with limited experiences with solicitations and/or limited time. This would be a much easier process if SFAs could simply notate “local” when seeking bids for unprocessed and/or minimally processed products. This proposed rule would help to streamline bid solicitation and create better points of connection between local producers and school markets.

Allowing SFAs to use local product specifications would vastly open up the market to smaller-scale and local producers. The current procurement system, even with geographic preference, heavily relies on ‘full and open competition’ requirements, which quickly and harshly weeds out all potential smaller producers from having the opportunity to sell their products to child nutrition programs. Small family farms cannot compete with large distributors in the full and open competition market—that is simple economies of scale. While geographic preference attempted to take down this issue by allowing schools to incorporate their preference of local foods into their algorithms for choosing the right procurement option...this still wasn’t enough to face full and open competition economies of scale.

A simple change allowing schools to set product specifications, not preferences, makes it clear to the small farmers interested in selling food to schools that they have a chance at competing with big distributors. This change would open up the market to fit small farms into the equation. If local producers knew that they actually now have a chance in the school food market, this would likely give them enough hope to try entering the market and allow SFAs to choose products from these small, local producers without an administrative headache. While full and open competition requirements would still act as the foundation for procurement purchases, the important public interest of supporting smaller-scale producers and purchasing fresh food could also be incorporated into school nutrition programs for families, SFAs, and farmers interested in developing these meaningful connections in the food value chain.

## 15. Miscellaneous changes

*This rulemaking proposes a variety of miscellaneous changes, including proposing to change the name of the meat/meat alternate meal component in NSLP, SBP, and CACFP regulations to the protein source component.*

- a. USDA invites public input on this terminology change for NSLP, SBP, and CACFP. Commenters are invited to provide feedback on the proposed change and to share their ideas for alternative options.**

We support changing the name of meat/meat alternate to protein. We also believe that protein needs to be its own category for breakfast, rather than be counted as a grain once the minimum grain ounce equivalents have been met. Additionally, we recommend that milk be moved into the meat/meat alternate category and not identified as a sole meal component. And with these adjustments, it would allow more flexibility for non-dairy milk substitutes to be included the meal pattern.

Along with all of these proposed changes, we propose an alternative option that explores more effective ways to credit school meals in a manner that reduces administrative burden and promotes the use of more fresh, wholesome ingredients. Namely, Nourish Colorado's Meal Crediting Feasibility Study, which we propose would look at SFAs inventory and menus, specifically focusing on the ingredients purchased and grouping them into distinct categories using nutritional information. There would then be thresholds set within each category with a transitional/phased-in approach towards a higher percentage of foods that fall with the highest nutritional value tier over a specified timeframe. By prioritizing fresh fruits and vegetables, whole grains, raw proteins, etc., nutrition improves and dietary patterns of our scholars would align with the Dietary Guidelines for Americans' recommendations. This model would lay out a whole foods-based approach to menu planning over a reliance on isolated nutrients, such as calories, sodium, saturated fat, trans fat, and sugar. See attached.

## 16. Summary of changes

*All proposed changes are summarized.*

## 17. Proposals from prior USDA rulemaking

## 18. Procedural matters

# **Making Wholesome, Fresh Foods the Norm in All Schools**

## **A School Meal Crediting Feasibility Study Proposal**

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### **Statement of Values**

The USDA's national Child Nutrition Programs (CNP) are some of the most crucial yet undervalued nutrition assistance programs in our country today, providing meals for around 30 million children. We know firsthand from personal connections that the real value these nutritional programs provide to kids, families, and communities extends far beyond the lunchroom. School food is an imperative part of the educational day, and it provides a platform to teach children meaningful healthy behaviors and social interactions that will affect their entire lifetimes.

### **Purpose**

The purpose of this proposal is to inform the creation of a simplified, USDA-accepted meal crediting process that eases the administrative burden on school food professionals and makes it easier to prepare healthy meals from scratch. With time saved, school nutrition professionals can focus on preparing creative and culturally responsive menus and can invest more time building new connections with a variety of essential and socially significant food suppliers.

### **Problem Statement**

The Healthy Hunger-Free Kids Act (HHFKA) has been a groundbreaking component of, and ally for, nutritious school food since its implementation in 2010. The core of the legislation's intent is effective, and school nutrition has made incredible strides because of its introduction. Not only has it advanced the preparation of healthy meals, HHFKA has also been instrumental in shifting old habits, stigmas, and paradigms that have surrounded school food. Now that the legislation



has been in effect for over a decade, key challenges with the current structure for ensuring meal compliance are emerging. These struggles make it difficult for districts to prioritize optimum nutrient-dense ingredient selections. Currently there are districts that are providing exceptional nutrition programs as they have the advantage of relevant knowledge, skills and resources that support navigating the complex maze of USDA crediting regulations. Simplification of meal crediting could be the program refinement that levels the playing field and creates universal access to preparing healthy meals from scratch for all districts.

Primary challenges of the current system are 1) how different ingredients within those meals are credited, which is tied to how they receive their meal reimbursements and 2) an over-reliance on isolated nutrient targets (e.g., sodium targets). The current crediting system has been shown to be complex and burdensome to our school food service professionals, many of whom are already challenged by a myriad of factors<sup>1</sup> that affect their ability to create wholesome food for children. As a result, many school food operators avoid or limit the use of a variety of ingredients (e.g., raw proteins, whole uncut produce) often used in scratch cooking as they are too difficult to track and credit. Instead, they over-prioritize ingredients that come with pre-identified crediting information. The rigidity of this current structure stifles creativity, requires more time when developing recipes to ensure compliance, and, in effect, leads to a reliance on pre-made products because they “check the box.”

## Opportunity Statement

We believe that there is an easier, alternative way to ensure schools are serving creditable meals while meeting and exceeding the nutritional goals of HHFKA. We theorize that the current meal crediting structure, which includes weekly nutritional and labeling requirements, can be met in a simpler way, via the school districts’ already-available purchasing inventory. We see an opportunity to conduct a comparable dietary guideline (DGA) menu analysis by categorizing the ingredients based on information already within their reach: their inventory. This categorization would provide targets for districts to reach that help move schools towards more healthy, scratch-made meals and still provides the necessary data to ensure meal compliance. We believe this will give our valued operators far more creativity and flexibility, reduce administrative burden, and lead to even higher quality meals that will ultimately benefit the health of our nation’s children.

## Proposed Feasibility Study

In order to pursue this opportunity, we propose a multi-year feasibility study of this new approach to how the USDA could credit school meals. The study will test a process for ensuring meal compliance by analyzing a school district’s yearly purchasing habits.

***Conducting the feasibility study would not interfere with or replace required reporting and accounting of current FNS regulations.***

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<sup>1</sup> Reference Docs [Child Nutrition Reporting Burden Analysis Study](#) and the 2021 [Rockefeller Foundation Report, 2022 school nutrition association position paper](#)

**Study Goals:**

The goal of the feasibility study is to inform the creation of a simplified, USDA-accepted meal crediting process that moves away from a cumbersome, isolated nutrient focus while making it easier to include whole, nutrient-dense ingredients and:

- Provide consistency in school meal programs, creating an emphasis on the importance of a healthy dietary pattern as a whole - rather than on individual nutrients, foods, or food groups in isolation - aligning with the 2020-2025 Dietary Guidelines.
- Reduce administrative burden for food service staff
- Provide simplicity, flexibility, and creativity in menu planning
- Increased participation in Child Nutrition Programs
- Simplify oversight responsibilities for state agencies
- Streamline operations by providing easy access to dynamic purchasing pattern data for school meal operators to forecast and plan menus, state agencies to support with purchasing shifts, USDA FNS to aggregate data of purchasing trends
- Identify and capture missing operational data points that could be used in the future for a paid vendor portal service or as an opportunity for the USDA to utilize and support districts in monetizing additional data through outside grants and school food support organizations.

**Additional Benefits:**

We believe there is the potential for additional auxiliary benefits that could occur as the result of our proposed process, including:

- Using the Multiplier Category, (for a comprehensive understanding of the the Value Tiers refer to [Appendix A](#)), identify additional opportunities in incentivizing values-based foods procurement from historically underused producers, such as small, local, or regional suppliers and/or farms, operations that are BIPOC or LGBTQ owned, co-ops, and food hubs
- Create community excitement, fulfillment, and awareness of local school food engagement
- Potentially provide data access points to non-profits, universities, and other research and evaluation organizations focused on better understanding the food system
- Ease forecasting for school food operators and create potential access points for distributors and food manufacturers
- Use reports to show progress and create marketing materials for overall school and community buy-in and support
- Support districts that want a quick glance of their menu and inventory, allowing them to make adjustments throughout the year, leading to a proactive approach to menu planning

# Study Details

## How:

The study will test a simplified structure that moves away from a complex and isolated nutrient approach to ease administrative burden and make time for increased flexibility and creativity in menu planning. We believe this can be achieved through existing inventory reports and that this process will make it easier to prepare healthy meals from scratch. Our feasibility study will test a structure for meal compliance by categorizing the ingredients based on nutritional value tiers and assigning targets within their inventory.

## To accomplish this we will:

- Create the test study parameters of a Tiered Inventory (for a comprehensive understanding of the the Nutritional Value Tiers see below or refer to [Appendix A](#))
- Create the Request for Proposal vetting process for ideal participants in order to provide a study that best reflects a wide mix of operationally diverse districts while providing a look at as many variables as possible
- Create and develop a data flow and engage a software database platform that will harvest, analyze, and sort data that creates simple compliance reports. For an example of a possible compliance report and data flowchart refer to [Appendix C](#) and [Appendix F](#)
- Use reports to support compliance during administrative reviews and for menu planning
- Collect values-based procurements data to support school systems in accessing a variety of available local, state, and philanthropic funds and grants. Incentivizing larger ratios of these buying patterns may also address some key difficulties relating to food security and procurement that was discovered during the height of the pandemic.

## Intent to Create Nutritional Value Tier Identifiers for the Feasibility study that seeks to:

- Create empowering vernacular for all participants and not emotionally disengage potential contributors due to the use of products in any one column, particularly due to conditions out of their control. E.g., Operational diversities, kitchen facilities, funding, staffing, economics etc.
- Apply an affirmative and inclusive value to each tier of products
- Attempt to avoid any unnecessary scrutiny or backlash from large food producers that provide many public-school food programs with various foods and meal options, and recognize that we have witnessed their attempt to follow various increased guidelines and requirements as they have shifted in recent times
- Help support the transition from the argument of Caloric vs. Nutritional value into assessing Nutrient Dense foods best for childhood dietary wellness
- Create supportive and affirmative percentage ratios of how much and how often food from each tier is utilized and therefore acceptable. Integrate an optimal use grading system with scores allocated to the use of each tier
- Encourage the intrinsic self-selection of procuring a higher percentage of Tier 2 and 3 nutritional items due to the simplified approach using tiers

<b>Nutritional Value Tier 1</b> <u>Optimum Usage % Low</u>	<b>Nutritional Value Tier 2</b> <u>Optimum Usage % Med</u>	<b>Nutritional Value Tier 3</b> <u>Optimum Usage % High</u>	<b>Procurement Multiplier</b> Local, Regional support
An example could be Pancake on a Stick	An example could be pre-cooked diced chicken, minimally processed marinara sauce	An example could be raw proteins, whole produce	
Foods / Ingredients determined by quantifiable* and DGA guidelines to contain the least Nutritional value, and the addition of unnecessary food fillers and additives.  <i>*It is important to be able to reference the quantifiable properties used in this category as it is the most argued by food producers and some Child Nutritional experts in the calorie vs nutrient dispute.</i>	Foods / Ingredients determined by quantifiable* and arguable methodology and DGA Guidelines to contain higher nutritional value due to minimum processing involving heating, cooking and/or canning and no fillers or chemical additives.	Foods / Ingredients determined by quantifiable* and DGA Guidelines to contain the highest nutritional value due to zero fillers or chemical additives. Traditionally, raw, and whole foods and also raw or frozen fabricated products that retain their inherent character. Does not include any products that are heated, cooked, or canned*	Foods / Ingredients that are procured thru local, regional, farm to school, and other socially supported or marginalized agricultural producer avenues.

**Tier 1** - Acknowledging that this is the typical entry point for many school food programs, and that even with an eventual goal of higher ratios of Tier 2 and 3 items, in many cases these items currently ensure that many children are consistently provided food through school meals.

**Tier 2-** Acknowledging that items in this Tier are many food programs' best efforts to move to **Tier 3** products and scratch food preparations, Many of these items support Speed scratch preparation, which is a valuable step for meaningful first steps and future development.

*"Minimally processed products" means raw or frozen fabricated products; products that retain their inherent character, such as shredded carrots or diced onions; and dried products, such as beans, but do not include any products that are heated, cooked, or canned which also aligns with the USDA definition of minimal processing for geographic preference procurement.*

*It is our understanding at this time that there are some conditions where various forms of packaging can become an unwanted additive to packaged foods through leaching. This is particularly relevant to items that may otherwise fit into Tier 2 or Tier 3 (i.e., individually wrapped sliced apples). For the purpose of our initial phases, this study will only look at additives directly and intentionally added to foods to determine their nutritional and healthy value in scoring.*

## Feasibility Study Proposed Methodology Timeline (\*hypothetical numbers)

**Year 1** - Establish percentages (targets) within each category. Analyze the inventory and see where the ingredients fall within the identified categories. Run a nutritional analysis to identify if the targets meet current regulations. If they do, this will become our baseline target for the districts to achieve. If they do not, we will increase/decrease the targets to establish a baseline for meeting the regulations.

<b>Nutritional Value Tier 1</b>	<b>Nutritional Value Tier 2</b>	<b>Nutritional Value Tier 3</b>	<b>Procurement Multiplier (Bonus)</b>
<i>At least 30% of their inventory falls within this category</i>	<i>At least 35% of their inventory falls within this category</i>	<i>At least 35% of their inventory falls within this category</i>	<i>If available, baseline data collected</i>

**Year 2** - After Year 1 and establishing a baseline for the targets, we will want to understand what percentages we can set the targets in each category to drive increased usage of items within the Nutritional Value Tiers 2 and 3. We would provide technical assistance between Year 1 and Year 2 to help districts shift items in their inventory into the Nutritional Value Tiers 2 and 3 and/or reduce usage of items in the Nutritional Value Tier 1. This could look like this:

<b>Nutritional Value Tier 1</b>	<b>Nutritional Value Tier 2</b>	<b>Nutritional Value Tier 3</b>	<b>Procurement Multiplier (Bonus)</b>
<i>At least 25% of their inventory falls within this category</i>	<i>At least 35% of their inventory falls within this category</i>	<i>At least 40% of their inventory falls within this category</i>	<i>Ranges from 1-5%</i>

**Year 3** - And for the final year, we will do the same by providing technical assistance, and increasing/decreasing the targets set within each category. This could look like this:

<b>Nutritional Value Tier 1</b>	<b>Nutritional Value Tier 2</b>	<b>Nutritional Value Tier 3</b>	<b>Procurement Multiplier (Bonus)</b>
<i>At least 15% of their inventory falls within this category</i>	<i>At least 35% of their inventory falls within this category</i>	<i>At least 50% of their inventory falls within this category</i>	<i>Ranges from 6-10%</i>

## Who:

We anticipate enrolling 20-30 school districts from across Colorado and Michigan in the study. Districts will represent diverse geographies, sizes, and experience with scratch-based cooking. All districts will participate in the National School Lunch Program and other relevant K12 school meal and snack programs. Participating districts will continue to operate and report as required by USDA FNS and their respective state agencies.

Upon funding, an RFP will be crafted to ensure a robust group of districts are involved in the feasibility study. RFP criteria could include:

- **Demographics & Other Characteristics:** Free and Reduced Lunch Program participation percentages, size of district (small, medium, large, extra large), locale (urban, rural, suburban), number of meals served.
- **Operations:** Staff skill level, kitchen infrastructure (storage, refrigeration, cooking equipment), meal production style (centralized, satellite, site-based), administrative review timeline, back office software usage, closed/open campus, operation style (self-operated, food service management company, meal vendor), participation in group purchasings, purchasing habits (primary vendors, local food sourcing, DOD fresh, USDA Foods).
- **Types of Meals Served:** Child Nutrition Programs (NSLP, SBP, ASP, SSO/SFSP, CACFP), à la carte foods, catering programs, vended meals, offer vs serve, meal preparation style (heat & serve, grab & go, scratch prepared, pre-packaged/individually wrapped, speed-scratch), participation in state/federal grant programs (Michigan's 10 Cents a Meal, Colorado's local food program, Farm to School grantees, etc.).

## Timeline & Approach

We propose a phased execution of the feasibility study and estimate the study will take about four years. Since a core intention of the feasibility study is to identify how purchasing habits shift when tied to a structural meal compliance component, we will work with participating districts for three full school years. The feasibility study must begin at least nine months before districts make purchasing decisions for the following school year. An additional three to five months will be necessary to complete data analysis, evaluation, and report development.

Our proposed timeline is below and the Gantt Chart can be found in [Appendix B](#). And a comprehensive work plan can be referred to in [Appendix E](#).

### **Phase 1: Due Diligence 7-9 months long, ideally begins Early Spring**

- Build the team, firm up methodology, database inputs and outputs, legalese, evaluation components
- Identify and vet databases and software companies that will best meet our needs
- Work with the programmers for a mock run of the structure to ensure the algorithms are providing the intended results

- Develop RFP for districts
- Upon confirming results of database capabilities and inventory categorization process, move into remaining phases

**Phase 2a: Baseline Targets *10-12 months long, ideally begins Oct/Nov 2022 - First School Year***

- **Release RFP and select districts**
- Collect district inventory reports from prior school year, run the report in the database, establish baseline targets, run nutritional comparison
- Provide technical assistance to support districts with making procurement shifts for Second SY, and during the second half of First SY.

**Phase 2b: Rapid Acceleration *11-12 months long, ideally begins July/Aug 2023 - Second School Year***

- Collect district inventory reports from First School Year, run the report in the database, track changes
- Conduct data collection, evaluation, and mock administrative reviews
- Provide technical assistance to support districts with making procurement shifts for Third SY and implementing new menu items during Second SY

**Phase 4: Rapid Acceleration & Final Reporting, ideally begins July/Aug - Third School Year**

- Collect district inventory reports from Second School Year, run the report in the database, track changes
- Conduct data collection, evaluation, mock administrative reviews; draft report
- Provide technical assistance to support districts with making procurement shifts for upcoming SY (if requested) and implement new menu items during Third SY
- Final District Purchasing Report for Third SY
- Final data collection, evaluation; and finalize the closing report.

## **Anticipated Outcomes**

We anticipate validating a measurable system for the USDA to encourage more scratch-based cooking with fresh, whole ingredients that is easier for administrators and districts to implement. The proposed study will examine, document, and make recommendations on the potential for the following outcomes:

- A noticeable and significant elevation in the composition of scratch-prepared meals due to the ease of ingredient selection and reduced crediting requirements.
- Stronger alignment with the 2020-2025 Dietary Guidelines for Americans (DGA) by focusing on a healthy dietary pattern as a whole instead of food and nutrients consumed and credited in isolation

- Shift to more ingredients in Nutritional Values Tiers 2 and 3 as those ingredients fall under the updated 2020-2025 DGA
- Increases in meal program participation
- Reduce the time commitment for the operational planning (e.g., forecasting, menu planning) along with the administrative review for both state agencies and school districts
- Ease recipe creation and flexibility, and stimulate the preparation of culturally responsive meals to better meet the needs of diverse student populations and taste preferences
- Incentivize the use of “multiplier tier” ingredients to support values-based foods procurement from historically underused producers, such as small, local, or regional suppliers and/or farms, operations that are BIPOC or LGBTQ owned, co-ops, and food hubs
- Share values-based procurements data to support school systems in accessing a variety of available local, state, and philanthropic funds and grants.

We also believe this is an opportunity to capture many additional data points that are already inherently available from district operations and could be further used to affect meaningful change. A request for data of this magnitude was recently submitted by Senators Stebenow and Boozeman in a letter to the Gov’t Accountability Office in 2021 tied to the USDA Foods Program.<sup>2</sup> We see this methodology as an opportunity for the USDA to further support districts in monetizing additional data through outside grants and school food support organizations, and the consideration of a Food and Nutrition Services (FNS) reimbursement line item.

*The due diligence phase will be used to distill down the quantifiable and measurable methodology and data points for each anticipated outcome.*

## Request for Funding Support

In order to initiate this multi-year study, we request a cooperative agreement with USDA FNS with a proposed contract amount of \$5 million over the life of the study.

We propose a phased implementation of the study. The first phase of due diligence will require \$420,000 and can be released first to ensure a successful program launch. Upon phase one completion, the remaining phases will require the funding amounts per annum.

Please see attached funding budget proposal.

Refer To Appendix D “Draft Budget”: [APPEN D Meal Crediting Draft Budget](#)

Funds will be contracted to Nourish Colorado, a licensed and accredited 501C3 with its organization in the State of Colorado, who will act as fiscal manager and will subcontract funds to Groundwork, participating districts, etc.

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<sup>2</sup> [2021 Letter To Gov’t Accountability Office \(GOA\) Requesting data](#)



## Next Steps

- Submit proposal to USDA for review
- Host informational calls as needed with USDA administrators and staff
- Secure support and funding for implementation of this feasibility study.

## Who We Are

[Nourish Colorado](#) is a statewide non-profit based in Denver, Colorado. We believe universal access to healthy, nutritious food is a fundamental human right. We work to ensure all Coloradans have equitable and abundant access to nutritious foods from sustainable sources. Nourish Colorado engages in systemic change through advocacy for better policies, statewide initiatives, and local and national partnerships. Nourish Colorado will act as fiscal manager and lead on this proposed study.

Our work began in 2008 as LiveWell Colorado (prior to our rebrand to Nourish in 2021) with primary support from the Colorado Health Foundation and Kaiser Permanente. A foundational pillar of our work was through the School Food Initiative, which supported schools as they offered more scratch-made meals to meet the new requirements set in the 2010 HHFKA. During the course of that program, which ran until 2018, we supported 100 out of the 180 districts in our state in creating transformational change for their school meal programs, serving a combined total of almost 770,000 students. We did this through chef-led culinary training, marketing support, administrative support, operational guidance and developing customized service plans that identified and addressed specific needs and challenges within each participating district. The Gretchen Swanson Center for Nutrition partnered on evaluation of the program's impact and successes. Documented impacts included a 8% increase in the usage of fresh/whole ingredients, a 10% decrease in the usage of highly processed ingredients and increased participation trends from 53.8% to 57.1% on average. 1,251 whole/fresh ingredients were incorporated into menu cycles along with 207 highly processed ingredients being eliminated. Along with these successes, districts increased salad bar usage, employed time management strategies to facilitate scratch cooking, promoted successes via published local, state, and nationwide media stories, and utilized operational strategies such as meals per labor hour to make data-driven decisions on new staffing models. Building upon the successes and scratch-cooking curriculum of the School Food Initiative and aiming to integrate training on local procurement, we launched Local Procurement Colorado (LoProCO) in 2018. LoProCO is a regional culinary training and procurement technical assistance initiative to support schools and agricultural producers to make farm-to-school the norm. We also directly contract with the Colorado Department of Education to provide meal quality training to school food operators around the state, provide training to Early Care Centers through our Department of Health and Environment, and directly contract with school districts for customized culinary, leadership, and operational training. We employ 2 trained chefs and have a team of chef consultants, including a registered dietitian, marketing consultants, and training and facilitation consultants who support

the services we provide. We are proud to be working side by side with almost every food service director in the state, and we both learn from and provide guidance to these partners on a daily basis.

Along with these efforts, we are active in varying statewide and nationwide coalitions. We fill leadership roles with the National Sustainable Agriculture Coalition, are a core-partner for the National Farm to School Network, led the development of and now sit on the Governor-appointed Colorado Food Systems Advisory Council, and participate in several work groups of the Colorado Blueprint to End Hunger. Nourish Colorado remains an active leader on several state policy issues, regularly introducing and implementing successful state bills that advance healthy food access across Colorado. In 2019 we successfully passed the Local Food Program that now provides an extra reimbursement to participating school districts for local food purchases and provides training to both districts and producers around establishing contractual relationships. To learn more about our school food work as well as our extensive work in the field of healthy food incentives, please visit [www.nourishcolorado.org](http://www.nourishcolorado.org).

[Groundwork Center for Resilient Communities](#) is a Michigan nonprofit that has worked for more than 25 years to protect the environment while also building solutions for local economies and community quality of life. Our Food & Farming program is our largest program, and we have been an anchor organization in Michigan working on local food economy initiatives for more than 20 years. We conduct our work by elevating ideas through strong communications, developing replicable on-the-ground models, and collaborating on projects and policy in coalitions and with partners statewide. Groundwork will be the co-lead on this proposed study.

Groundwork launched farm to school programming in northwest Lower Michigan in 2004 and now is a core state partner with the Michigan Department of Education in its nationally recognized 10 Cents a Meal for Michigan's Kids & Farms program. 10 Cents a Meal provides matching grants for schools and early childhood education centers for purchasing Michigan-grown produce. Groundwork, in its home base of northwest Michigan and with funding from the W.K. Kellogg Foundation, tested the 10 Cents a Meal model in order to demonstrate to the legislature the value of a procurement incentive program to increase nutritious food access for children in schools while also investing in Michigan's agricultural economy. At the state level, Groundwork is the communications and outreach partner for 10 Cents a Meal. Our 10 Cents team now also includes staff members in Grand Rapids and Lansing who have strong connections in Detroit, Flint, Saginaw, and other regions of the state.

Following Groundwork's regional pilot project, the Michigan legislature funded first a state pilot and now a full-fledged, \$5 million program available to schools and early childhood education centers statewide. A survey of all Michigan schools by the Michigan State University Center for Regional Food Systems showed that 91% of 10 Cents a Meal grantee districts reported purchasing local foods, compared to 58% of all schools. Evaluation data for five years now also shows that the top outcome for food service directors of participating in 10 Cents a Meal is that the variety of produce they serve to students increases. The most recent report to the legislature, which Groundwork produces, shows that between 73% and 78% of grantees,

respectively, said 10 Cents a Meal purchasing of fresh Michigan produce increased fruit consumption and vegetable consumption among the students and children they serve. However, Groundwork's experience with the 10 Cents a Meal program as it expanded during the Covid pandemic also shows that school districts face many challenges that funding support for purchasing food cannot solve alone, including time constraints, confusion navigating the logistics of local food procurement, and how best to incorporate fresh, seasonal ingredients into their menus. Groundwork, the Michigan Department of Education, the Michigan Department of Agriculture and Rural Development, and the Center for Regional Food Systems all are working together to help address these challenges and build on the opportunity of 10 Cents a Meal. The program has consistently received bipartisan support in Michigan's legislature and was included in press releases from Gov. Gretchen Whitmer's administration highlighting budget line items that support Michigan's Strategic Education Plan.

Groundwork's staff includes journalists who are experts in storytelling and other forms of communications, as well as policy development. In addition, Groundwork employs two registered dietitians on its staff who have experience working with child and community nutrition programs and hold understandings of farm to institution and institutional foodservice operations. Together, they have extensive experience in creating curriculum and training materials and delivering presentations, including those specific to meal crediting in the Child and Adult Care Food Program; first-hand experience in how confusing meal crediting topics can be, especially in how it translates in the kitchen; and experience conducting culinary and nutrition trainings such as Cooking Matters. In addition, Groundwork currently is working in northwest Michigan with the region's major health care institution, Munson Healthcare, to build and host a culinary medicine teaching kitchen at Groundwork's new home office in Traverse City. One of Groundwork's two dietitians was the key curriculum designer for two major Culinary Medicine trainings, funded by the Michigan Health Endowment Fund. Prior to joining Groundwork, she also served as Director of Health Promotion Programs for University Health Services at Carnegie Mellon University, which included extensive experience in recipe nutrient analysis for food service operations.

Groundwork also is a founding member of the Michigan Farm to Institution Network, a supporting partner of the National Farm to School Network, a supervisor of FoodCorps service members since it was established, and a member of coalitions regarding children's health and local food economies statewide including Healthy Kids Healthy Michigan and the Michigan Local Food Council Network. In addition to its farm to school work, Groundwork also has been a leader in food access and equity. To learn more, please visit [www.groundworkcenter.org](http://www.groundworkcenter.org).

## Attachments / Appendix

Please see attached (letters go to page in doc, name is hyperlinked out):

- (A) [Nutritional Value Tier Identifiers](#)
- (B) [Feasibility Study Timeline \(Gantt\)](#)
- (C) [Feasibility Inventory Calculator](#)
- (D) [Feasibility Study Proposed Budget](#)
- (E) [Scope Work Plan](#)
- (F) [Feasibility Data Flowchart](#)
- (G) [Admin Review Doc Side by Side Current Vs Proposed](#)
- (H) [Reference Study Materials and Papers](#)
- (I) [Meal Crediting "One Sheeter"](#)
- [Letters of Support](#) *and found here*
- [Signatories](#)

**Intent to Create Nutritional Value Tier Identifiers for the Feasibility study that seeks to:**

- Create empowering vernacular for all participants and not emotionally disengage potential contributors due to the use of products in any one column, particularly due to conditions out of their control. E.g., Operational diversities, kitchen facilities, funding, staffing, economics etc.
- Apply an affirmative and inclusive value to each tier of products
- Attempt to avoid any unnecessary scrutiny or backlash from large food producers that provide many public-school food programs with various foods and meal options, and recognize that we have witnessed their attempt to follow various increased guidelines and requirements as they have shifted in recent times
- Help support the transition from the argument of Caloric vs. Nutritional value into assessing Nutrient Dense foods best for childhood dietary wellness
- Create supportive and affirmative percentage ratios of how much and how often food from each tier are utilized and therefore acceptable. eIntegrate an optimal use grading system with scores allocated to the use of each tier
- Encourage the intrinsic self-selection of procuring a higher percentage of Tier 2 and 3 nutritional items due to the simplified approach using tiers

Nutritional Value Tier 1 <u>Optimum Usage % Low</u>	Nutritional Value Tier 2 <u>Optimum Usage % Med</u>	Nutritional Value Tier 3 <u>Optimum Usage % High</u>	Procurement Multiplier Local, Regional support
An example could be Pancake on a Stick	An example could be pre-cooked diced chicken, minimally processed marinara sauce	An example could be raw proteins, whole produce	
<p>Foods / Ingredients Determined by Quantifiable* and DGA guidelines to contain the least Nutritional value, and the addition of unnecessary food fillers and additives.</p> <p><i>*It is important to be able to reference the quantifiable properties used in this category as it is the most argued by food producers and some Child Nutritional experts in the calorie vs nutrient dispute.</i></p>	<p>Foods / Ingredients Determined by Quantifiable* and arguable methodology and DGA Guidelines to contain higher nutritional value due to minimum processing involving heating, cooking and/or canning and no fillers or chemical additives.</p>	<p>Foods / Ingredients Determined by Quantifiable* and DGA Guidelines to contain the highest nutritional value due to zero fillers or chemical additives. Traditionally, Raw, and whole foods and also includes raw or frozen fabricated products that retain their inherent character, - but does not include any products that are heated, cooked, or canned*</p>	<p>Foods / Ingredients that are procured thru local, regional, farm to school, and other socially supported or marginalized agricultural producer avenues.</p>

**Tier 1** - Acknowledging that this is the typical entry point for many school food programs, and that even with an eventual goal of higher ratios of Tier 2 and 3 items, in many cases these items currently ensure that many children are constantly provided food through school meals.

**Tier 2-** Acknowledging that items in this Tier are many food programs' best efforts to move to Tier 3 products and scratch food preparations, Many of these items support Speed scratch preparation which is a valuable step for meaningful first steps and future development.

It is our understanding at this time that there are some conditions where various forms of packaging can become an unwanted additive to packaged foods through leaching. This is particularly relevant to items

that may otherwise fit into Tier 2 or Tier 3 (i.e., individually wrapped sliced apples). For the purpose of our initial phases, this study will only look at additives directly and intentionally added to foods to determine their nutritional and healthy value in scoring.

"Minimally processed products" means raw or frozen fabricated products; products that retain their inherent character, such as shredded carrots or diced onions; and dried products, such as beans, but do not include any products that are heated, cooked, or canned which also aligns with the USDA definition of minimal processing for geographic preference procurement.

### Feasibility Study Proposed Methodology Timeline (\*hypothetical numbers)

**Year 1** - Establish percentages (targets) within each category. Analyze the inventory and see where the ingredients fall within the identified categories. Run a nutritional analysis to identify if the targets meet current regulations. If they do, this will become our baseline target for the districts to achieve. If they do not, we will increase/decrease the targets to establish a baseline for meeting the regulations.

Nutritional Value Tier 1	Nutritional Value Tier 2	Nutritional Value Tier 3	Procurement Multiplier (Bonus)
<i>At least 30% of their inventory falls within this category</i>	<i>At least 35% of their inventory falls within this category</i>	<i>At least 35% of their inventory falls within this category</i>	<i>If available, baseline data collected</i>

**Year 2** - After Year 1 and establishing a baseline for the targets, we will want to understand what percentages we can set the targets in each category to drive increased usage of items within the Nutritional Value Tiers 2 and 3. We would provide technical assistance between Year 1 and Year 2 to help districts shift items in their inventory into the Nutritional Value Tiers 2 and 3 and/or reduce usage of items in the Nutritional Value Tier 1. This could look like this:

Nutritional Value Tier 1	Nutritional Value Tier 2	Nutritional Value Tier 3	Procurement Multiplier (Bonus)
<i>At least 25% of their inventory falls within this category</i>	<i>At least 35% of their inventory falls within this category</i>	<i>At least 40% of their inventory falls within this category</i>	<i>Ranges from 1-5%</i>

**Year 3** - And for the final year, we will do the same by providing technical assistance, and increasing/decreasing the targets set within each category. This could look like this:

Nutritional Value Tier 1	Nutritional Value Tier 2	Nutritional Value Tier 3	Procurement Multiplier (Bonus)
<i>At least 15% of their inventory falls within this category</i>	<i>At least 35% of their inventory falls within this category</i>	<i>At least 50% of their inventory falls within this category</i>	<i>Ranges from 6-10%</i>

Feasibility Study Phases and Timeline

Phase 1: Due DiligenceEarly Spring

- Building Team, Methodology, Inputs, Outputs
- Vetting Database and Software Companies (includes mock run of structure)
- Develop RFP for Districts

Upon confirming results of database capabilities and inventory categorization process – we move into Phase 2 for the entire feasibility study

Phase 2a: Baseline TargetsFirst School Year

- RFP Released and Districts Selected
- District Inventory Reports (prior SY) and establishing baseline targets
- Procurement Shifts for Second SY, and 2nd ½ of First SY, TA provided

Phase 2b: Rapid AccelerationSecond School Year

- District Purchasing Reports (First SY) and Inventory Report
- Data Collection, Evaluation, mock AR reviews, TA provided
- TA Provided, Procurement Shifts for Third SY

Phase 2c: Rapid Acceleration & Final ReportingThird School Year

- District Purchasing Reports ( Second SY) and Inventory Report
- Data Collection and Eval, Report Creation, mock AR reviews, TA provided
- Data Collection and Eval, Report Draft, mock AR reviews, TA provided
- District Purchasing Records (Third SY) and Final Reporting



## APPENDIX C. rev 11/11

## FEASIBILITY STUDY: COMPLIANCY INVENTORY REPORT example

School	FSSCHOOL 1	Tier 1 Goal	20%	at or below
Population	100	Tier 2 Goal	35%	at or below
Meals Served Daily	200	Tier 3 Goal	45%	at or above.
Annual Meal Service (days)	170			
Annual Meal Served	34000	Multiplier tier	10%	

NVT Invoiced QTY SUM

case and unit size used for meal calculator

TIER	ITEM VELOCITY	Component	Sub-code	Note	INVENTORY ITEM
1	3	1000	Milk		MILK, 1% LF
1	3	33	Fruit		STRAWBERRY, PREM CLAMSHELL
1	3	26	Veg	Other	LETTUCE, ICEBERG TOSSED COMBO
1	3	24	Veg	Dark Green	LETTUCE, SPRING MIX
1	3	23	Fruit		ORANGE, CHOICE 113 CT
1	3	21	Veg	Red Orange	CARROT, BABY WHL PLD
1	3	19	Fruit		BANANA, GREEN TIPPED RETAIL
1	3	17	Grain		TORTILLA, WHL WHEAT 6" PRESS
1	3	17	Veg	Other	CUCUMBER, 24CT
1	3	16	M/M/A		BEEF, GRND 81/19 CHUB FZN
1	3	16	Veg	Starchy	BEAN, GRN REG CUT IQF GRD A
1	3	15	Fruit		GRAPE, RED LUNCH BUNCH
1	3	15	Veg	Starchy	CORN, CUT SPR SWT IQF GRD A
1	3	14	Veg	Other	LETTUCE, ICEBERG SHRED 1/8"
1	3	14	Veg	Other	CELERY, STICK 4"X.25"X1.25"
1	3	13	M/M/A		CHEESE, CHDR SHRD FCY
1	3	13	Veg	Red Orange	TOMATO, CHERRY
1	3	13	Fruit		BLUEBERRY, FRSH
1	3	13	Veg	Dark Green	BROCCOLI, FLORET BITE-SIZE
1	3	12	M/M/A	Topping	CHEESE, MOZZ SHRD FTMR LMPS
1	3	11	Veg	Red Orange	TOMATO, 5X6 1 LAYER
1	3	10	Fruit		APPLE, RED DEL XFCY 125
1	3	18	Veg	Other	CAULIFLOWER, FLORET BITE SIZE
1	2	18	M/M/A		PORK, PULLED SMKD FC W-VINGR SCE
1	2	17	M/M/A	Grain	CHICKEN, 8PC BRD CNTRY KRSP HNY CKD
1	2	11	M/M/A		EGG, CKD HARD PLD PREM SEL
1	2	10	Fruit		APPLESAUCE, UNSWT WATER PK DMST
1	2	10	Grain		BAGEL, WHITE WHEAT WG SLI IW
1	2	10	Veg	Red Orange	TOMATO, DICED RED
1	2	21	Veg	Legume	BEAN, REFRIED ROSARITA
1	2	16	Grain		BREAD, WHEAT PULLMAN SLI 1/2"
1	1	132	Milk		MILK, CHOC FF HALF PINT
1	1	29	Grain		FRENCH TOAST, STICK BTRD
1	1	26	M/M/A		SAUSAGE, PTY CKD 1.5Z
1	1	21	M/M/A		OMELETTE, CHDR CHSE 6"
1	1	18	Grain	M/M/A	PIZZA, BRKFST TRKY SAUSG WG CN
1	1	16	Grain		PANCAKE, WG 1.14Z
1	1	15		Condime	DRESSING, RANCH BTRMLK
1	1	15	M/M/A		FRANKS, ALL BEEF 6" 8X1 ROLLER GRILL
1	1	13		Cooking I	MARGARINE, SOLID VEG OIL
1	1	13	M/M/A		YOGURT, TRIX TRIPLE CHERRY
1	1	12	M/M/A		SAUCE, CHSE NACHO TFF
1	1	11	Veg	Starchy	POTATO, TATER BARRELS
1	1	11		Condime	KETCHUP, PKT FCY PC 9GM
1	1	10	Grain	M/M/A	SANDWICH, PEANUT BTR GRAPE WHEAT
1	1	9	M/M/A	Grain	CHICKEN, NUGGET WG BRD GLDN CRISPY
1	1	16	Fruit		FRUIT COCKTAIL, JP CHO DMST

## DISTRICT HEALTHY MENUS COMPLIANCY REPORT

MENU ITEM Submitted and Reviewed

PRODUCTION SHEETS Submitted and Reviewed

TOTAL INVENTORY ITEMS	47				
	Tier 3	Tier 2	Tier 1	Tier 4 Items	Alert Items
Inventory Items	23	8	16	8	1
Inventory %	49%	17%	34%	17%	2%
Item Velocity, Total	1373	113	367	1147	
AVG, FREQUENCY Per	60	14	23	143	

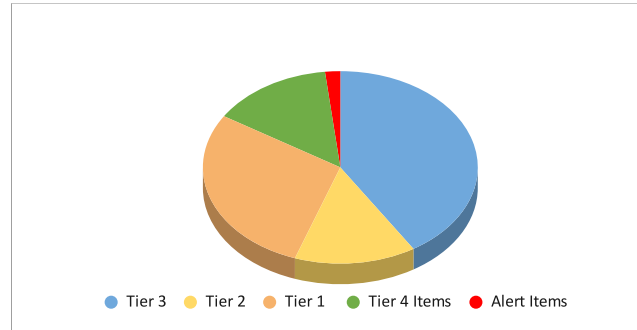
Further Calculations Of frequency % determined by Meal Component Criteria and Sub Category Code

Calculated Meals

Served-influenced

by Tier Frequency	16626	5780	11560	5066	714
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SCORING METRIC 4-6+ Pass 1-3 Corrective Action Required

COMPLIANCY SCORE 4 PASS  
ADJUSTED COMPLIANCY SCORE 4.15

## COMPLIANCY SCORE DETAILS

Based on your Inventory TierScore your operation has Been Scored as Compliant

An optimum ratio of T1-T3 Inventory Items with a high percentage and frequency of Tier 3 ingredients has been achieved.

Based on your Inventory Tier Score your operation has opportunity to grow to achieve compliancy in:

TIER 2 items are within the acceptable range

Tier 1 items fall within an elevated volume, Reduction of Tier 1 Inventory Items by 15% will increase the Healthy Meals Served and Increase Your OVERALL Compliancy Score.

Additionally, Based on your Inventory Assessment Your;

Tier 4 Multiplier use of Local and regional products exceeds a goal of 10% and makes your operation eligible for public and private funds and grants that support local farms and local economies

## A Tier 2 Item

APPLESAUCE, UNSWT WATER PK DMST

That is produced and procured locally thru a Farm to School Avenue has added a multiplier of an additional .15 to your overall compliancy Score

Your Inventory Assessment produced "1" Item that is an alert Item

MARGARINE, SOLID VEG OIL

This Item needs further clarification or replacement before it it can be accurately assesed

Items in TIER 1 that may be lowering Compliancy Score

The following accelerated velocity of Tier 1 items may be negatively affecting your optimum compliancy score

MILK, CHOC FF HALF PINT

Considering a frequency reduction of these items will improve your overall compliancy score



<b>Details for Key Roles Throughout the Feasibility Study (<i>this is a summary and does not encompass everything and also has flexibility to adjust if needed</i>)</b>		
<b>Nourish Colorado</b>	Nourish CO will lead project management and implementation throughout the course of the feasibility study. This includes, but is not limited to - identifying and securing key support team and contractors, leading process of vetting software/database companies, lead testing of inventory categorization and report development, lead vetting of evaluation and nutritional analysis partners - including evaluation framework and metrics, lead crafting of district RFP, vetting metrics, and selection process, lead and facilitate communication between all project partners, lead feasibility testing with districts and supplemental technical assistance based on inventory report, lead and coordinate mock admin reviews between State Agencies and participating districts, lead and support data collection needs for evaluation and identified metrics, lead dissemination of feasibility study results and crafting of final report.	
<b>Groundwork Center for Resilient Communities</b>	Groundwork Center will co-lead project management and implementation throughout the course of the feasibility study, with a focus on Michigan. They will be responsible for supporting the items listed above (Nourish Colorado role) and managing overall implementation of the feasibility study in Michigan. Key components will be for them to identify and secure their key support team and contracts, support software/database vetting and the testing of inventory categorization and report development, support evaluation metrics and identifying needed data to collect, support district RFP crafting and lead selection of districts for Michigan with insight from CO team, lead feasibility testing with participating districts and provide supplemental technical assistance with support from CO team, facilitate and lead mock admin reviews in coordination with MI State Agency, facilitate data collection and support dissemination of results and crafting of final report.	
<b>Participating Districts</b>	Participating districts will have to fill out an RFP and be selected to participate in the feasibility study. Participating districts will continue to operate their meal programs as normal. They will submit purchasing reports for specified school years in the specified format (support will come from CO and MI teams if needed), attend mostly virtual meetings and conference calls scheduled in advance around their availability, participate in calls to disseminate the results from their inventory report, craft service plan for technical assistance (TA) - the TA will be based on their desired goals after reviewing the inventory report and scoring within the value tiers. TA could look like - menu planning support, recipe development support, culinary skills training for staff (knife skills, equipment usage, vegetable cookery, raw protein handling, time management, kitchen flow and organization, etc.), procurement support (writing specification and solicitations, identifying local/value-added producers/farmers to source from), marketing efforts, etc. Each Service Plan will be revisited throughout the feasibility study and adjusted as each years' purchasing records are uploaded and the inventory report is received. Participating districts will also go through a mock admin review and will be asked to provide interviews/surveys detailing their experience with this proposed model and overall ease of use and/or opportunities to improve.	
<b>CO and MI State Agencies</b>	Leads from both State Agencies will play a supplemental role throughout the feasibility study with a key focus on ensuring this feasibility study will work for them to verify meal compliance. They will support the software/database vetting process - if applicable, providing connections, along with ensuring the software/database is able to meet their needs for conducting administrative reviews. They will be a key partner as we build out the inventory report to again ensure this meets their needs and will facilitate the process of conducting mock admin reviews with the participating districts when the time comes. As needed, they can also support the building of the evaluation, metrics, and data collection needs. They will be kept informed of the technical assistance needs and overall progress being made via the inventory report process and overall feasibility study progress.	
<b>Contractual Support - Feasibility Implementor</b>	The Feasibility Implementor will support overall project implementation, working closely with the Nourish CO Project Lead and other key partners as identified. They will play a critical role in identifying and vetting software/database companies, crafting the inventory report, and working through evaluation metrics and data collection needs. They will support the participating districts via Nourish CO and Groundwork, in partnership with the chef and marketing consultants. They will also focus on supporting our evaluation partner with understanding the implications of the proposed model, variations to explore, opportunities identified, and overall dissemination of data and crafting of the final report.	
<b>Contractual Support - Chef and Marketing Consultants</b>	The Chef and Marketing Consultants will be utilized as an extension of the CO team and for the MI team if needed. They will work with Project Leads and Co-Leads to implement the technical assistance needed based on each participating district's service plan and their inventory reports. Should the MI team need it, the CO chef and marketing consultants could be available to travel to MI and help train a team of consultants - along with training the Groundworks' team on culinary and marketing topics as desired. The CO consultants will report to Nourish Project Lead and any MI consultants will report to Groundwork Project Lead while having the support of the CO Nourish Team.	
<b>Contractual Support - Evaluation Partner</b>	The Evaluation Partner will play a critical role in collecting and evaluating the data and overall metrics developed for the feasibility study. They will provide input on the metrics along with variations of data to collect and measure. They will support disseminating the information and lead the crafting of the final report with input from all the key players in the feasibility study.	
<b>Contractual Support - Nutritional Analysis</b>	The Nutritional Analysis support person will work with Project Leads in CO and MI, relevant contractors, and other key partners as needed. Their primary focus will be to run a nutritional analysis of the inventory report in a multi-phased approach. First phase will be to ensure our proposed model meets current nutritional requirements set in HHFKA. Second phase will be to run a nutritional analysis next to each participating districts inventory report - again, to ensure nutritional requirements are still being met and this will happen for each year of the feasibility study in line with the inventory reporting timeline.	
<b>Contractual Support - Data Entry, Data Collection</b>	The Data Entry and Data Collection support person will be responsible for entering nutritional, inventory, procurement data as needed along with collecting varying points of data that is needed for the feasibility study (qualitative interviews with participating districts and state agencies, purchasing reports, mock admin review documents, etc.)	
<b>Software/Database Team</b>	The Software/Database team will lead the programming and design of the algorithm for the inventory report. A main goal of ours is to vet software/databases that are already in use and identify ways to build upon their systems for the envisioned inventory report and overall feasibility study.	
<b>Timeframe</b>	<b>Phase 1: Due Diligence (estimated 8 months minimum length)</b>	
<b>Item</b>	<b>Justification</b>	<b>Cost Estimates</b>
Nourish Colorado Staff Time	Project Lead. For initial crafting of team, identifying database options and programming needs, crafting district RFP, support building out of inventory categories	\$90,000.00

Groundwork Staff Time	Co-lead/project support. Secure their team, support database identification and programming needs, support crafting RFP for districts and inventory categorization	\$65,000.00
Contractual Support	Project Support(s). Will help with identifying priority databases and programmatic needs, inventory categorization and report development, data entry, trial run of inventory report, crafting RFP	\$80,000.00
Software/Database Time	To cover costs for initial conversations and programmatic needs within the database, inventory reporting, and overall assessing database platforms and building the algorithm for creating the reports	\$120,000.00
CO Dept of Ed	Time for Dept of Ed to participate in initial study tests, ensuring our model, the database, and other elements will work for their needs and overall compliance needs	\$25,000.00
MI Dept of Ed	Time for Dept of Ed to participate in initial study tests, ensuring our model, the database, and other elements will work for their needs and overall compliance needs	\$25,000.00
Nutritional Analysis Consultants	To ensure the first trial run of the inventory and database aligns with nutritional standards before we move forward	\$15,000.00
<b>Total</b>		<b>\$420,000.00</b>
<b>Timeframe</b>	<b>Phase 2a: Baseline Targets (estimated 10-12 months)</b>	
<b>Item</b>	<b>Justification</b>	<b>Cost Estimates</b>
Nourish Colorado Staff Time	Project Lead. Facilitate project implementation, issue RFP's, select districts, secure and analyze purchasing reports, support district needs based on inventory reports, lead project calls with internal team, project team, participation districts, and other relevant partners. Includes any potential travel costs	\$140,000.00
Groundwork Staff Time	Project co-lead. Facilitate project implementation, issue RFP's, select districts, secure and analyze purchasing reports, support district needs based on inventory reports, support project calls with internal and external team, participating districts, and other relevant partners. Includes any potential travel costs	\$110,000.00
Contractual Support	Project Support. Support database/programmatic/algorithm/reporting needs, provide technical assistance to participating districts, administrative responsibilities, data collection, includes travel support	\$140,000.00
Software/Database Time	Costs for refining the algorithm, inventory reporting, database sorting, portal access	\$78,000.00
Software Platform	Programmatic requirements, software fees, maintaince, support, upgrades, addt. data entry	\$70,000.00
Data Entry	As needed, support data entry into the software platform/database	\$25,000.00
CO Dept of Ed	Time for Dept of Ed to participate in study, help conduct 'mock' admin reviews, ensure restructure meets their needs for meal compliance	\$60,000.00
MI Dept of Ed	Time for Dept of Ed to participate in study, help conduct 'mock' admin reviews, ensure restructure meets their needs for compliance	\$60,000.00
Participating Districts Time	Time to support school districts time for participating in study. Collecting inventory records, developing inventory tracker for small purchases, feedback and evaluation support. Variable scale based on 20-30 districts with sliding scale in relation to size of district and level of involvement.	\$525,000.00
Evaluation	Contractor to help build evaluation metrics and evaluate efficacy of restructured model, collect and analyze data, identify and analyze trends and future data collection possibilities	\$75,000.00
Nutritional Analysis Consultants	Will support assessment of inventory reports from districts compared to nutritional value	\$30,000.00
<b>Total</b>		<b>\$1,313,000.00</b>
<b>Timeframe</b>	<b>Phase 2b: Rapid Acceleration (estimated 11-12 months)</b>	
<b>Item</b>	<b>Justification</b>	<b>Cost Estimates</b>
Nourish Colorado Staff Time	Project Lead. Facilitate project implementation, manage and support participating districts, secure and analyze purchasing reports, support district needs based on inventory reports, lead project calls with internal team, project team, participation districts, and other relevant partners. Support data collection and evaluation process. Includes any potential travel costs	\$140,000.00
Groundwork Staff Time	Project co-lead. Facilitate project implementation, manage and support participating districts, secure and analyze purchasing reports, support district needs based on inventory reports, support project calls with internal and external team, participating districts, and other relevant partners. Support data collection and evaluation process. Includes any potential travel costs	\$110,000.00
Contractual Support	Project Support. Support database/programmatic/algorithm/reporting needs, provide technical assistance to participating districts, administrative responsibilities, data collection, includes travel support	\$140,000.00
Software/Database Time	Costs for refining the algorithm, inventory reporting, database sorting, portal access	\$78,000.00
Software Platform Costs	Programmatic requirements, software fees, maintaince, support, upgrades, addt. data entry	\$70,000.00
Data Entry	As needed, support data entry into the software platform/database	\$25,000.00

CO Dept of Ed	Time for Dept of Ed to participate in study, help conduct 'mock' admin reviews, ensure restructure meets their needs for compliance	\$60,000.00
MI Dept of Ed	Time for Dept of Ed to participate in study, help conduct 'mock' admin reviews, ensure restructure meets their needs for compliance	\$60,000.00
Participating Districts Time	Time to support school districts time for participating in study. Collecting inventory records, developing inventory tracker for small purchases, feedback and evaluation support, and any additional services needed to help facilitate changes made within their purchasing habits (professional development skills training, equipment, etc.)	\$825,000.00
Evaluation	Contractor to help build evaluation metrics and evaluate efficacy of restructured model, collect and analyze data, identify and analyze trends and future data collection possibilities	\$75,000.00
Nutritional Analysis Consultants	Will support assessment of inventory reports from districts compared to nutritional value	\$30,000.00
<b>Total</b>		<b>\$1,613,000.00</b>
<b>Timeframe</b>	<b>Phase 2c: Rapid Acceleration and Final Reporting (estimated 12 months)</b>	
<b>Item</b>	<b>Justification</b>	<b>Cost Estimates</b>
Nourish Colorado Staff Time	Project Lead. Facilitate project implementation, manage and support participating districts, secure and analyze purchasing reports, support district needs based on inventory reports, lead project calls with internal team, project team, participation districts, and other relevant partners. Support data collection and evaluation process. Facilitate collection of data and assessment of that data for the final report. Includes any potential travel costs	\$140,000.00
Groundwork Staff Time	Project co-lead. Facilitate project implementation, manage and support participating districts, secure and analyze purchasing reports, support district needs based on inventory reports, support project calls with internal and external team, participating districts, and other relevant partners. Support data collection and evaluation process. Facilitate collection of data and assessment of that data for the final report. Includes any potential travel costs	\$120,000.00
Contractual Support	Project Support. Support database/programmatic/algorithm/reporting needs, provide technical assistance to participating districts, administrative responsibilities, final data collection and review, support final report drafting, includes travel support	\$175,000.00
Software/Database Time	Costs for refining the algorithm, inventory reporting, database sorting, portal access	\$78,000.00
Software Platform Costs	Programmatic requirements, software fees, maintaince, support, upgrades, addt. data entry	\$70,000.00
Data Entry	As needed, support data entry into the software platform/database	\$25,000.00
CO Dept of Ed	Time for Dept of Ed to participate in study, help conduct 'mock' admin reviews, ensure rest	\$60,000.00
MI Dept of Ed	Time for Dept of Ed to participate in study, help conduct 'mock' admin reviews, ensure rest	\$60,000.00
Participating Districts Time	Time to support school districts time for participating in study. Collecting inventory records, developing inventory tracker for small purchases, feedback and evaluation support, and any additional services needed to help facilitate changes made within their purchasing habits (professional development skills training, equipment, etc.)	\$800,000.00
Evaluation	Contractor to review evaluation metrics and evaluate efficacy of restructured model, collect and analyze data, identify and analyze trends and future data collection possibilities, support final dissemination of data and crafting of the final report	\$95,000.00
Nutritional Analysis Consultants	Will support assessment of inventory reports from districts compared to nutritional value	\$30,000.00
<b>Total</b>		<b>\$1,653,000.00</b>
<b>Total Costs</b>		<b>\$4,999,000.00</b>

**APPENDIX E rev. 3/27/23**
**Feasibility Study Proposed Work Plan: 4 Year Timeline**

Phase and Timeline	Activity	Organization(s) / People Responsible
<b>Phase 1: <i>Due Diligence</i></b> 7-9 months long, ideally begins Early Spring		
<b>Step 1</b>	Build the team, firm up methodology, database inputs and outputs, legalese, evaluation components	Nourish Colorado Groundwork Subcontractors MI and CO Dept of Ed's
<b>Step 2</b>	Identify and vet databases and software companies, ideally working within platforms commonly used by school food operators and state agencies. Begin developing RFP for districts	Nourish Colorado Groundwork Subcontractors Software/Database Leads MI and CO Dept of Ed's
<b>Step 3</b>	Work with the programmers for a mock run of the structure to ensure algorithms are providing the intended results	Nourish Colorado Groundwork Subcontractors Software/Database Leads MI and CO Dept of Ed's Nutritional Consultants
<b>Step 4</b>	Upon confirming results of database capabilities and inventory categorization process - Finalize RFP for districts and move into the remaining phases.	Nourish Colorado Groundwork Subcontractors MI and CO Dept of Ed's
<b>Once Phase 1 is complete - phases 2a - 2c are all together and not meant to happen separate from each other</b>		
<b>Phase 2a: <i>Baseline Targets</i></b> 10-12 months long, ideally begins Oct/Nov - First School Year		
<b>Step 1</b>	Release RFP and select participating districts. Continue to build out database and inventory report functionality	Nourish Colorado Groundwork Subcontractors Software/Database Leads
<b>Step 2</b>	Collect district purchasing reports from Prior School Year (SY) in format specified for running inventory report	Nourish Colorado Groundwork Subcontractors Participating Districts
<b>Step 3</b>	Input district purchasing reports into database, receive inventory reports *ideally this happens before districts make procurement decisions for upcoming SY	Nourish Colorado Groundwork Subcontractors Software/Database Leads
<b>Step 4</b>	Establish baseline targets within the Nutritional Value Tiers and run a nutritional comparison for each district	Nourish Colorado Groundwork Subcontractors Software/Database Leads Participating Districts MI and CO Dept of Ed's

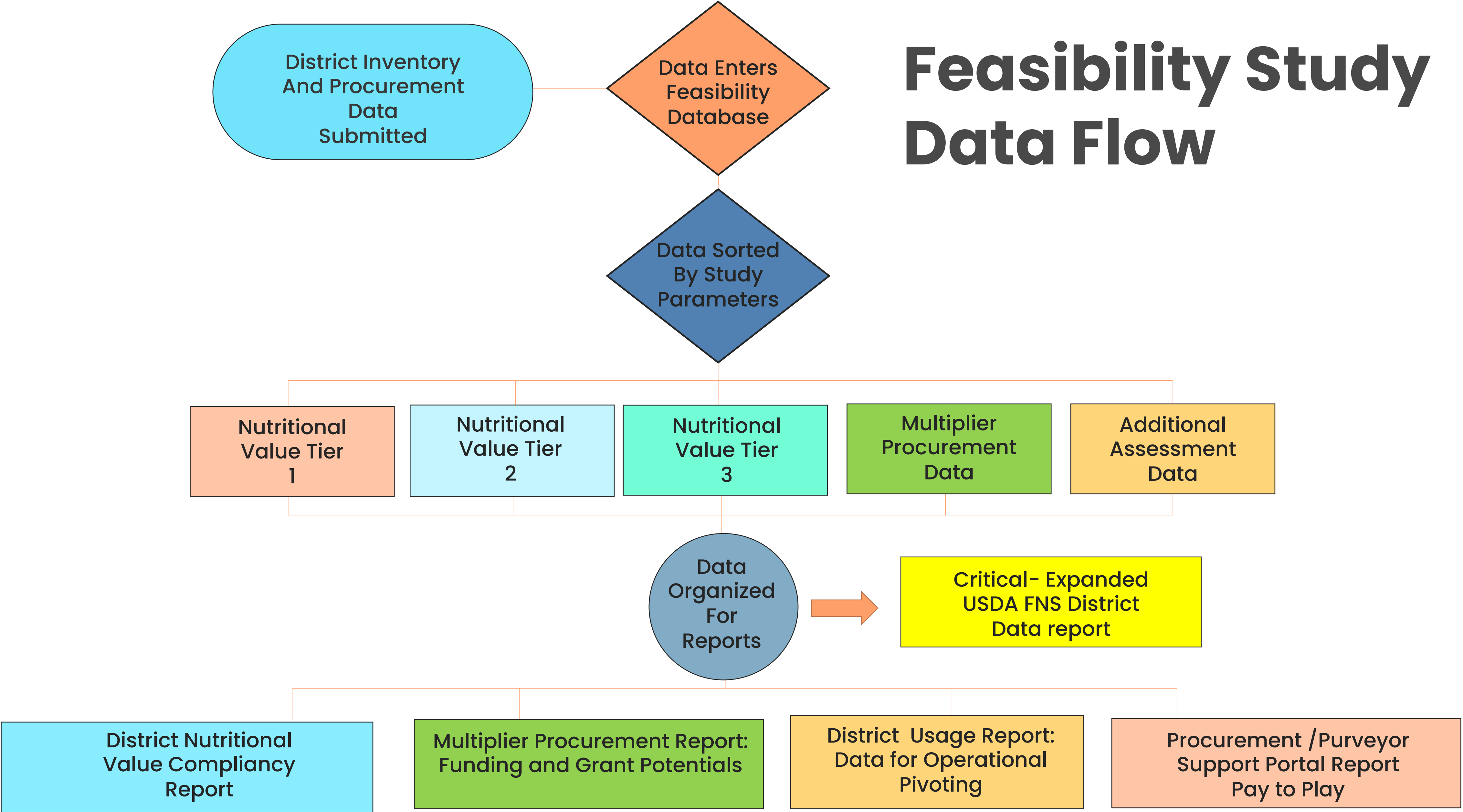
**APPENDIX E rev. 3/27/23**
**Feasibility Study Proposed Work Plan: 4 Year Timeline**

		Nutritional Consultants Evaluation Consultants
<b>Step 5</b>	Present reports to each district and Dept of Education. Review purchasing plans for second half of First SY, identifying targeted inventory items to purchase that can increase their scores within Value Tiers 2 and 3. Offer technical assistance (culinary skills training, recipe development, solicitations/bids) as needed to facilitate changes.	Nourish Colorado Groundwork Subcontractors Software/Database Leads Participating Districts Evaluation Consultants
<b>Step 6</b>	Review inventory report with each district as they look to purchase products for Second SY. Identify targeted inventory items to purchase that can increase their scores with Value Tiers 2 and 3 and decrease scores in Value Tier 1. Offer technical assistance to facilitate those changes (culinary training, connecting to local producers, values-based procurement, etc.)	Nourish Colorado Groundwork Subcontractors Software/Database Leads Participating Districts Evaluation Consultants
<b>Phase 2b: <i>Rapid Acceleration</i></b> 10-12 months long, ideally begins Jul/Aug - Second School Year		
<b>Step 1</b>	Collect district purchasing reports from First School Year (SY) in format specified for running inventory report	Nourish Colorado Groundwork Subcontractors Participating Districts
<b>Step 2</b>	Input district purchasing reports into database, receive inventory reports, notate and track changes between Purchasing Reports from Prior SY	Nourish Colorado Groundwork Subcontractors Software/Database Leads Evaluation Consultants Nutritional Consultants
<b>Step 3</b>	Present reports to each district and Dept of Education.  Conduct data collection, continued evaluation, and begin mock administrative reviews	Nourish Colorado Groundwork Subcontractors Software/Database Leads Evaluation Consultants MI and CO Dept of Ed's Participating Districts
<b>Step 4</b>	Provide technical assistance to support districts with making procurement shifts for Third SY and implementing new menu items during Second SY  Identify targeted inventory items to purchase that can increase their scores with Value Tiers 2 and 3 and decrease scores in Value Tier 1. Offer technical assistance to facilitate those changes (culinary training, connecting to local producers, values-based procurement, etc.)	Nourish Colorado Groundwork Subcontractors Software/Database Leads Participating Districts Evaluation Consultants

**APPENDIX E rev. 3/27/23****Feasibility Study Proposed Work Plan: 4 Year Timeline**

<b>Phase 2c: <i>Rapid Acceleration and Final Reporting</i></b> 12-15 months long, ideally begins Jul/Aug - Third School Year		
<b>Step 1</b>	Collect district purchasing reports from Second School Year (SY) in format specified for running inventory report	Nourish Colorado Groundwork Subcontractors Participating Districts
<b>Step 2</b>	Input district purchasing reports into database, receive inventory reports, notate and track changes between Purchasing Reports from First SY, and Prior SY 21-22	Nourish Colorado Groundwork Subcontractors Software/Database Leads Evaluation Consultants Nutritional Consultants
<b>Step 3</b>	Present reports to each district and Dept of Education.  Conduct data collection, continued evaluation, and begin mock administrative reviews  Begin drafting report	Nourish Colorado Groundwork Subcontractors Software/Database Leads Evaluation Consultants MI and CO Dept of Ed's Participating Districts
<b>Step 4</b>	Provide technical assistance to support districts with making procurement shifts for upcoming SY (if requested) and implement new menu items during Third SY	Nourish Colorado Groundwork Subcontractors Software/Database Leads Participating Districts Evaluation Consultants
<b>Step 5</b>	Collect final district purchasing reports from Third School Year (SY) in format specified for running inventory report	Nourish Colorado Groundwork Subcontractors Participating Districts
<b>Step 6</b>	Final Data Collection, Evaluation, and Finalize the Closing Report	Nourish Colorado Groundwork Subcontractors Software/Database Leads Evaluation Consultants MI and CO Dept of Ed's Participating Districts

# Feasibility Study Data Flow

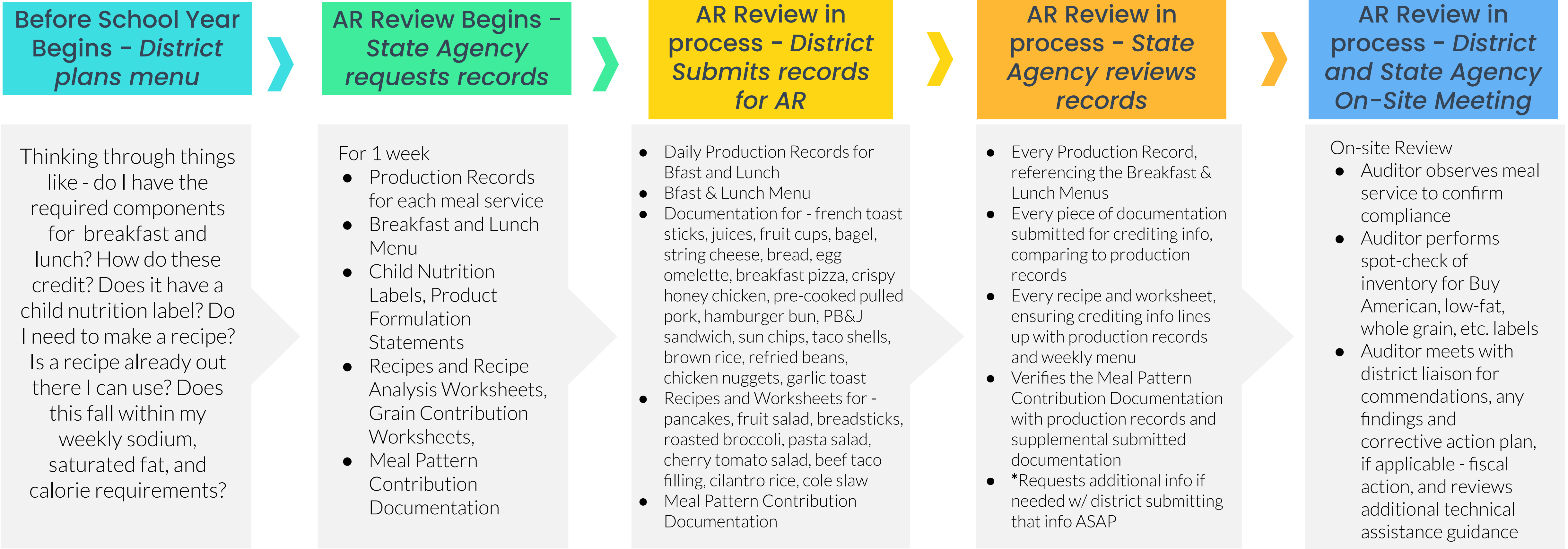




# Administrative Review (AR) Flow of Information – Current Model

*This example shows the flow of information between a school district and their state agency when it is time for their administrative review. This example focus only on the meal compliance section of the AR in relation to how meals are credited. This district follows the Food Based Menu Planning technique and the example is built using ingredients from “Appendix Doc C : Mock Feasibility Inventory Category”*

	Monday	Tuesday	Wednesday	Thursday	Friday
Breakfast Grain Fruit Milk	French Toast Sticks Pear Cup / Juice 1% and FF Choc	Bagel / String Cheese Strawberries / Juice 1% and FF Choc	Toast / Egg Omelette Blueberries 1% and FF Choc	Pancakes Peach Cup / Juice 1% and FF Choc	Bfast Pizza Sausage Fresh Fruit Salad 1% and FF Choc
Lunch M/MA Grain Milk Fruit Veg	Crispy Honey Chicken Homemade Breadstick 1% and FF Choc Oranges Roasted Broccoli	BBQ Pork Sandwich Pasta Salad 1% and FF Choc Apples Cherry Tom Salad	PB&J Sandwich Bread 1% and FF Choc Bananas Sun Chips	Beef Tacos Cilantro Rice 1% and FF Choc Kiwi Cups Refried Beans	Chicken Nuggets Garlic Toast 1% and FF Choc Grapes Cole Slaw





# Administrative Review (AR) Flow of Information – Proposed Model

*This example shows the flow of information between a school district and their state agency when it is time for their administrative review. This example focus only on the meal compliance section of the AR in relation to how meals are credited. This district follows the Food Based Menu Planning technique and the example is built using ingredients from “Appendix Doc C : Mock Feasibility Inventory Category”*

	Monday	Tuesday	Wednesday	Thursday	Friday
Breakfast Grain Fruit Milk	French Toast Sticks Pear Cup / Juice 1% and FF Choc	Bagel / String Cheese Strawberries / Juice 1% and FF Choc	Toast / Egg Omelette Blueberries 1% and FF Choc	Pancakes Peach Cup / Juice 1% and FF Choc	Bfast Pizza Sausage Fresh Fruit Salad 1% and FF Choc
Lunch M/MA Grain Milk Fruit Veg	Crispy Honey Chicken Homemade Breadstick 1% and FF Choc Oranges Roasted Broccoli	BBQ Pork Sandwich Pasta Salad 1% and FF Choc Apples Cherry Tom Salad	PB&J Sandwich Bread 1% and FF Choc Bananas Sun Chips	Beef Tacos Cilantro Rice 1% and FF Choc Kiwi Cups Refried Beans	Chicken Nuggets Garlic Toast 1% and FF Choc Grapes Cole Slaw

**Before School Year  
Begins – District  
plans menu**



**AR Review Begins –  
State Agency  
requests records**



**AR Review in  
process – District  
Submits records  
for AR**



**AR Review in  
process – State  
Agency reviews  
records**



**AR Review in  
process – District  
and State Agency  
On-Site Meeting**

Thinking through things like - do I have the required components for breakfast and lunch? Is there anything that I plan to order outside of my primary vendor that I need to track? What ingredients fall within Tier 2 and 3 that can increase my score? What falls within the multiplier category? Any new recipes to try?

- 1 Week Production Records for each meal service
- 1 Month Breakfast and Lunch Menu
- Purchasing Reports - 1 prior school years' worth in specified format

- Purchasing reports from prior school year
- 1 Week of Daily Production Records for Bfast and Lunch
- 1 Month Bfast & Lunch Menu

- Inputs purchasing reports into database - receive Inventory Report
- Reviews Production Records ensuring meal pattern requirements are met for Breakfast & Lunch
- Reviews monthly menu ensuring required components are offered
- \*Requests additional info if needed w/ district submitting that info ASAP

- On-site Review
- Auditor observes meal service to confirm compliance
  - Auditor performs spot-check of inventory for Buy American, low-fat, whole grain, etc. labels
  - Auditor meets with district liaison for commendations, any findings and corrective action plan, if applicable - fiscal action, and reviews additional technical assistance guidance

## Reference Documents, Relevant Papers, Articles

*The following documents were utilized to inform and support the development of the Meal Crediting Feasibility Study.*

[2019 School Nutrition and Meal Cost Study](#)

[2019 Child Nutrition Reporting Burden Analysis Study](#)

[2022 School Nutrition Association Position Paper](#)

[2021 Senators Stebenow and Boozman letter to Gov't Accountability Office  
RE: USDA Foods Program / Direct reference to item 4](#)

[2020 Dietary Guidelines for Americans](#)

[2020 Dietary Guidelines for Americans Exec Summary](#)

The LiveWell@School Food Initiative supported schools with scratch cooking for almost 10 years. Gretchen Swanson Center for Nutrition was the evaluation partner for the program. A selection of Evaluations, Quantitative Menu Analyses, and Infographics can be found below:

- [LiveWell@School Food Initiative 2018 Infographic](#)
- [2016 Evaluation of the LW@SFI Shows Increases in Scratch Cooking and Improvement in Nutritional Content](#)
- [2015 LW@SFI Quantitative Menu Analysis](#)

[2021 Ingredient Guide for Better School Food Purchasing](#)

[2021 Ingredient Guide Quick Reference Guide](#)

[Lifetime Foundation Harmful 7 Cheat Sheet](#)

[2021 RockeFeller Foundation Report](#)

[Farm to School Census Website](#)

[2020 California Scratch Cooking Report](#)

[2021 CSPI School Meals Corporate Report Card](#)

# MAKING WHOLESOME, FRESH FOODS THE NORM IN ALL SCHOOLS: A SCHOOL MEAL CREDITING FEASIBILITY STUDY PROPOSAL

In 2010, the Healthy, Hunger-Free Kids Act (Child Nutrition Reauthorization) created some of the largest changes to Child Nutrition programs since the sixties. Due to these changes we have seen increases in fresh fruits and vegetables, scratch-made meals, farm to school programs, and overall improved nutritional quality. Districts have since learned how to navigate the new regulations while also working through new challenges.

One challenge that has emerged is the administrative burden of determining how meals credit. This feasibility study being proposed by Michigan and Colorado partners would test a new structure for crediting meals to reduce this burden while still ensuring meal pattern requirements and regulations are being met.

This feasibility study aims to test if meal regulations can be met with already existing reports of food inventory and menus. We hope to examine if this proposed structure would make meal crediting easier for schools - from rural to urban, small to large, fully from-scratch to heat and serve models, etc. By simplifying food service operator's administrative burden we hope to find they have more time to plan their menus, incorporate more scratch-cooking, and increase the use of whole foods. The legacy of this feasibility study could set the table for a forward-thinking transformation in school food that makes it both easier for staff and better for kids.



## STREAMLINE AND SIMPLIFY

- 1.Reduce administrative burden for food service staff
- 2.Simplify oversight responsibilities for state agencies
- 3.Provide consistency in child meal programs to better follow the dietary guidelines
- 4.Achieve at least the same and likely improved results as our current system

## TEST MEETING REGULATIONS BASED ON INVENTORY

- 1.Focus on ingredients that schools purchase
- 2.Group ingredients into distinct Value Tiers based on nutritional factors
- 3.Use nutrition information of ingredients to place them into their respective Value Tiers
- 4.Set targets within each Value Tier with a phased-in approach towards higher % in Value Tiers 2 and 3 over a specified timeframe

## ASSESS FOOD ENVIRONMENT AND TIME MANAGEMENT

- 1.Free up administrative time to create whole food recipes that students enjoy
- 2.Examine changes to meal production, staff training and/or equipment improvements
- 3.Review changes to food environment (e.g., increased scratch cooking and/or locally grown ingredients, stronger wellness policies)



## WHAT WE PROPOSE

A multi-year feasibility study between Michigan and Colorado. School districts who participate in the feasibility study will still follow current meal pattern regulations and record-keeping to ensure compliance. For the feasibility study, districts would also provide inventory reports and additional information as needed to gather data for evaluation needs. Tentative metrics for the feasibility study are:

- Nutrition evaluation to determine alignment with the goals of the Healthy, Hunger-Free Kids Act and positive or negative trends
- Percent of inventory in each Value Tier and change over time
- How the system impacts administrative burden for all stakeholders
- Other changes catalyzed, such as culinary training, equipment purchases, local food procurement, and satisfied workforce, students, and parents.

Districts selected for this feasibility study will have varying **Free and Reduced Meal Percentages, Demographics, Levels of Scratch-Cooking, Locale, and District Size.**

### \$5 MILLION IN FUNDING FOR THIS MULTI-YEAR STUDY WOULD

- Support a Tech/Data Analyst to build and manage inventory sorting database
- Support state agencies' time, districts' time, and key partners' time (Nourish Colorado and Groundwork Center for Resilient Communities)
- Provide incentive funding for districts that are above Tier 2 and Tier 3 targets to retain skilled staff and/or invest in certified culinary skills trainings for their staff

***If your state is interested in participating in this multi-year feasibility study, please estimate increasing the budget between \$2.5-3.5 million per state***

## ACKNOWLEDGMENTS

After extensive experience working with Colorado food service staff, the structure of this feasibility study was designed by Jessica Wright with Wendy Peters Moschetti at **Nourish Colorado**; coupled with feedback from Diane Conners, Paula Martin, and Melanie Wong of Groundwork Center for Resilient Communities; Diane Golzynski, from **Michigan Department of Education**; Leah Carpenter of the **Gretchen Swanson Center for Nutrition**; and Michigan and Colorado school nutrition staff. The **Colorado Department of Education** is able to provide feedback on the implementation of this feasibility study.

## **Attached Letters of Support:**

1. Greeley-Evans Weld County School District 6 (CO)
2. Creede School District (CO)
3. Englewood Schools (CO)
4. Montague Area Public Schools (MI)
5. School Nutrition Association of Michigan
6. Colorado School Nutrition Association
7. FoodCorps
8. National Farm to School Network
9. LunchAssist





USDA Food & Nutrition Service  
Braddock Metro Center II  
1320 Braddock Place  
Alexandria, VA 22314

November, 22, 2021

To Whom it May Concern:

I am submitting this letter to express my strong support for the school meal crediting feasibility study being proposed by Nourish Colorado and Groundwork Center for Resilient Communities based in Michigan. This is an innovative approach to making administrative review easier while working to make scratch cooking the norm in all of our schools.

COVID has demonstrated how critical schools are to providing consistent, nutrient-dense foods to students as well as their families. COVID has also put extra strain on an already-burdened school food system, with severe labor shortages and tight budgets. At the same time, school food services staff continue to find every means at their disposal to feed their kids the freshest, healthiest foods possible. We need to make this goal easier.

District 6 has worked hard to implement scratch cooking and local sourcing. In order to make these practices sustainable, we have invested in equipment and personnel. The barriers continue to pop up as we try to make these practices meet USDA Procurement Regulations.

The feasibility study being proposed would address key barriers and optimize our best assets by making it easier for our state administrators and our school food service directors to assess the foods they purchase, and then in a reasonable manner move towards more whole ingredients. Saving time while becoming better equipped to provide affordable meals made with whole ingredients is an obvious goal for which we strive.

I hope my district is able to participate in this study, and I look forward to when the entire nation can benefit from this approach. I strongly suggest the USDA provide full funding for the proposed study.

Please feel free to contact me anytime to discuss this further.

Sincerely,

Name

Danielle Bock, SNS

Director of Nutrition Services

Greeley-Evans Weld County School District 6

USDA Food & Nutrition Service  
Braddock Metro Center II  
1320 Braddock Place  
Alexandria, VA 22314

November 19<sup>th</sup>, 2021

To Whom it May Concern:

I am submitting this letter to express my strong support for the school meal crediting feasibility study being proposed by Nourish Colorado and Groundwork Center for Resilient Communities based in Michigan. This is an innovative approach to making administrative review and menu planning easier while working to make scratch cooking the norm in all of our schools.

COVID has demonstrated how critical schools are to providing consistent, nutrient-dense foods to students as well as their families. COVID has also put extra strain on an already-burdened school food system, with severe labor shortages, supply chain challenges, and tight budgets. At the same time, school food services staff continue to find every means at their disposal to feed their kids the freshest, healthiest foods possible. We need to make this goal easier.

Since joining the Creede School District in 2016 as the School Food Authority, I have been given the awesome responsibility of feeding the future of our community. My goal from the beginning was to make our kitchen 100% scratch-made & to use as much locally sourced products as possible. When COVID hit we lost a lot of food availability through our normal food service provider. Only by utilizing the Valley Roots Food Hub in Mosca, CO were we able to continue to feed our students the scratch-made foods they have come to love. Having the ability to make menu items that the students enjoy, and following the meal crediting system is very time consuming but worth the work.

The feasibility study being proposed would address key barriers and optimize our best assets by making it easier for our state administrators and our school food service directors to assess the foods they purchase, and then in a reasonable manner move towards more whole ingredients. Saving time (which equals money!) while becoming better equipped to provide affordable meals made with whole ingredients is an obvious goal for which we strive.

I hope Creede School District is able to participate in this study, and I look forward to when the entire nation can benefit from this approach. I strongly suggest the USDA provide full funding for the proposed study.

Please feel free to contact me anytime to discuss this further.

Sincerely,

[Malcolm Snead](#)

SFA

Creede School District

Creede, CO

[malcolm@creedek12.net](mailto:malcolm@creedek12.net)



**USDA Food & Nutrition Service**  
**Braddock Metro Center II**  
**1320 Braddock Place**  
**Alexandria, VA 22314**

November 11, 2021

To Whom it May Concern:

I am submitting this letter to express my strong support for the school meal crediting feasibility study being proposed by Nourish Colorado and Groundwork Center for Resilient Communities based in Michigan. This is an innovative approach to making administrative review and menu planning easier while working to make scratch cooking more accessible for all schools.

COVID has demonstrated how critical schools are to providing consistent, nutrient-dense foods to students as well as their families. COVID has also put extra strain on an already-burdened school food system, with severe labor shortages, supply chain challenges, and tight budgets. At the same time, school food services staff continue to find every means at their disposal to feed their kids the freshest, healthiest foods possible. We need to make this goal easier.

Our district has worked hard to move towards more scratch-based cooking using whole, fresh ingredients that we know kids like and will eat. In 2018, we moved to purchasing more local produce and started incorporating more speed scratch recipes in our menus. However, we have significant barriers to doing so since COVID because our labor has shifted to wrapping everything, which takes a substantial amount of time. Additionally, it has become increasingly difficult to get product, resulting in an adjusted menu to items we know are available. Our district has been unable to embrace scratch-based and fresh foods because our labor is already constrained. In Colorado, our minimum wage is \$12/hour; however, that is still not enough to attract talent. Why would they want to work for less when they can go to In-and-Out down the street and make \$20+/hour? The Federal reimbursement rate has been too low for too long. Our department runs an incredibly tight FTE with little overhead, yet our labor and benefits eat up 80% of the annual budget. Myself, as well as other administrative staff in the district work in kitchens regularly because it is difficult to fill open positions.

The feasibility study being proposed would address key barriers and optimize our best assets by making it easier for our state administrators and our school food service directors to assess the foods they purchase, and then in a reasonable manner move towards more whole ingredients. Saving time and stretching the Federal dollar to go as far as possible to provide the *best* meals for our students, every day. Becoming better equipped to provide affordable meals made with whole ingredients is an obvious goal for which we strive.

I hope my district is able to participate in this study, and I look forward to when the entire nation can benefit from this approach. I strongly suggest the USDA provide full funding for the proposed study.

Please feel free to contact me anytime to discuss this further.

Sincerely,

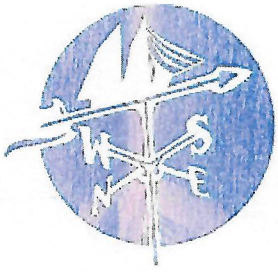
**Katie L Cossette, MDA, RDN, SNS**  
**Director of Nutrition Services**



4101 S. Bannock St.  
Englewood, CO 80110  
[katie\\_cossette@engschools.net](mailto:katie_cossette@engschools.net)

This institution is an equal opportunity provider.





# Montague Area Public Schools

4882 Stanton Blvd. — Montague, MI 49437 — Telephone 231-893-1515 — Facsimile — 231-894-6586

USDA Food & Nutrition Service  
1320 Braddock Place  
Alexandria, VA 22314

November 22, 2021

To Whom it May Concern:

I am submitting this letter to express my strong support for the school meal crediting feasibility study being proposed by Nourish Colorado and Groundwork Center for Resilient Communities based in Michigan. This is an innovative approach to making administrative review easier while working to make scratch cooking the norm in all of our schools.

COVID has demonstrated how critical schools are to providing consistent, nutrient-dense foods to students as well as their families. COVID has also put extra strain on an already-burdened school food system, with severe labor shortages and tight budgets. At the same time, our school food services staff continue to find every means at their disposal to feed their kids the freshest, healthiest foods possible. We need to make this goal easier.

I am the food service director for Montague Area Public Schools a rural school in Western Michigan. We have worked hard to move toward more scratch-based cooking using whole, fresh ingredients, including working with our county Career Tech Center's culinary program to have students develop and test recipes utilizing Michigan-grown ingredients. We have been a participant in the 10 Cents a Meal for Michigan's Kids & Farms program since it started as a four-year state pilot in 2016, and now, in the last two years, when it has become a program available statewide. We are happy that our state supports this program, which provides matching funds up to 10 cents per reimbursable meal for buying and serving Michigan-grown produce. However, we could do so much more if food service time was freed up in a more stream-lined meal crediting process. I am involved with the legislative committee of the School Nutrition Association of Michigan, which has signed on as a supporter of the feasibility study, and I am in frequent contact with other food service directors around the state and I believe they would feel the same way.

The feasibility study being proposed would address key barriers and optimize our best assets by making it easier for our state administrators and our school food service directors to assess the foods they purchase, and then in a reasonable manner move towards more whole ingredients. Saving time (which equals money!) while becoming better equipped to provide affordable meals made with whole ingredients is an obvious goal for which we strive.

I hope my district is able to participate in this study, and I look forward to when the entire nation can benefit from this approach. I strongly suggest the USDA provide full funding for the proposed study.

Please feel free to contact me anytime to discuss this further.

Sincerely,

Dan Gorman  
Food Service Director  
Montague Area Public Schools

OUR MISSION IS TO EDUCATE AND INSPIRE ALL STUDENTS TO BECOME  
Motivated, Articulate, Productive, Successful CITIZENS FOR TODAY, TOMORROW, FOREVER





USDA Food & Nutrition Service  
Braddock Metro Center II  
1320 Braddock Place  
Alexandria, VA 22314

December 2, 2021

To Whom it May Concern:

I am submitting this letter representing the School Nutrition Association of Michigan (SNAM) to offer our support to facilitate the school meal crediting feasibility study being proposed by Nourish Colorado and Groundwork Center for Resilient Communities based in Michigan. This is an innovative approach to making administrative review easier while working to make scratch cooking the norm in all our schools.


COVID has demonstrated how critical schools are to providing consistent, nutrient-dense foods to students as well as their families. COVID has also put extra strain on an already-burdened school food system, with severe labor shortages and tight budgets. At the same time, school food services staff continue to find every means at their disposal to feed their kids the freshest, healthiest foods possible. We need to make this goal easier.

Michigan legislators and the Michigan Department of Education have shown their commitment to Michigan schools serving more meals and snacks with fresh, whole ingredients thanks to the 10 Cents a Meal for Michigan's Kids & Farms program. SNAM worked hard advocating for 10 Cents a Meal, which provides support to schools to purchase Michigan-grown fruits, vegetables, and legumes with up to 10 cents per reimbursable meal in matching grants. We have seen the difference that an increase in fresh whole foods can make to Michigan's school meal programs, with happier kids and happier parents. However, not all schools have extensive experience yet with farm to school procurement and streamlining the time required to meet current meal credit requirements, as this feasibility study is intended to address, will help all our schools across the state be better able to embrace more meals using fresh ingredients and the produce that Michigan's farms grow.

The feasibility study being proposed would address key barriers and optimize our best assets by making it easier for our state administrators and our school food service directors to assess the foods they purchase, and then in a reasonable manner move towards more whole ingredients. Reducing regulatory and administrative burdens (which equals money!) while becoming better equipped to provide affordable meals that provide the link between nutrition, health and education is an obvious goal for which we strive. It is also complementary to our 10 Cents a Meal program.

We are excited to see Michigan taking the lead on this innovative study and offer to help the facilitation of implementation (i.e., distributing out requests for proposals for districts to apply, serving as a thought partner on available databases, study design, connecting to key partners as applicable, etc.). We look forward to when the entire nation can benefit from this approach and strongly suggest the USDA provide full funding for the proposed study.

Please feel free to contact me anytime to discuss this further.

Sincerely,   
Jennifer Mattison, President, School Nutrition Association of Michigan



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*Feeding Bodies. Fueling Minds.™*

USDA Food & Nutrition Service  
Braddock Metro Center II  
1320 Braddock Place  
Alexandria, VA 22314

November 22, 2021

To Whom it May Concern:

I am submitting this letter representing the Colorado School Nutrition Association and to offer our support to facilitate the school meal crediting feasibility study being proposed by Nourish Colorado and Groundwork Center for Resilient Communities based in Michigan. This is an innovative approach to making administrative review easier while working to make scratch cooking the norm in all of our schools.

COVID has demonstrated how critical schools are to providing consistent, nutrient-dense foods to students as well as their families. COVID has also put extra strain on an already-burdened school food system, with severe labor shortages and tight budgets. At the same time, school food services staff continue to find every means at their disposal to feed their kids the freshest, healthiest foods possible. We need to make this goal easier.

The feasibility study being proposed would address key barriers and optimize our best assets by making it easier for our state administrators and our school food service directors to assess the foods they purchase, and then in a reasonable manner move towards more whole ingredients. Reducing regulatory and administrative burdens (which equals money!) while becoming better equipped to provide affordable meals that provide the link between nutrition, health and education is an obvious goal for which we strive.

We are excited to see Colorado taking the lead on this innovative study and offer to help the facilitation of implementation (i.e., distributing out requests for proposals for districts to apply, serving as a thought partner on available databases, study design, connecting to key partners as applicable, etc.). We look forward to when the entire nation can benefit from this approach and strongly suggest the USDA provide full funding for the proposed study.

Please feel free to contact me anytime to discuss this further.

Sincerely,

*Jodi McKinney*

Jodi McKinney *on behalf of the CSNA Executive Committee*  
Executive Director  
Colorado School Nutrition Association



USDA Food & Nutrition Service  
Braddock Metro Center II  
1320 Braddock Place  
Alexandria, VA 22314

November 8, 2021  
To Whom it May Concern:

I am submitting this letter to express my strong support for the school meal crediting feasibility study being proposed by Nourish Colorado and Groundwork Center for Resilient Communities based in Michigan. This is an innovative approach to making administrative review and menu planning more efficient while working to make scratch cooking the norm in all of our schools.

COVID has demonstrated how critical schools are to providing consistent, nutrient-dense foods to students. COVID has also put extra strain on an already-burdened school food system, with severe labor shortages, supply change challenges, and tight budgets. At the same time, school nutrition staff continue to find every means at their disposal to feed their kids the freshest, healthiest foods possible. We need to find innovative solutions to support their success.

FoodCorps' mission is to connect kids to healthy food in school. Through over a decade partnering with over 200 school communities across the country, we have seen firsthand how kids thrive when they have access to food education and nourishing meals at school. Our school nutrition partners whose operations include scratch cooking and sourcing whole, locally and regionally produced foods have reported fewer supply chain disruptions and more resilience compared to others who mostly rely on products from broadline distributors that deliver products with Child Nutrition labels. Investing in this pilot will create and test an innovative model that can make it easier for the many school nutrition directors across the country who want innovate to use more whole foods in their programs.

The feasibility study being proposed would address key barriers and optimize our best assets by making it easier for our state administrators and our school food service directors to assess the foods they purchase, and then in a reasonable manner move towards more whole ingredients. Saving time (which equals money!) while becoming better equipped to provide affordable meals made with whole ingredients is an obvious goal for which we strive.

With your support, I hope our FoodCorps Michigan district partners are ready and able to participate in this study, and I look forward to when the entire nation can benefit from this approach after learning from this model. I strongly suggest the USDA provide full funding for the proposed study. Please feel free to contact me anytime to discuss this further.

Sincerely,

Jillian Dy  
Policy Specialist, FoodCorps

*get involved*  
FoodCorps.org

*connect*  
(212) 596-7045

*visit*  
1140 SE 7th Avenue, Suite 110  
Portland, OR 97214



USDA Food & Nutrition Service  
Braddock Metro Center II  
1320 Braddock Place  
Alexandria, VA 22314

November 17, 2021

To Whom it May Concern:

National Farm to School Network would like to express our organization's strong support for the school meal crediting feasibility study being proposed by Nourish Colorado and Groundwork Center for Resilient Communities based in Michigan. This study will take a measured and focused approach on making administrative review and menu planning easier while working to make scratch cooking the norm in all of our schools.

COVID-19 has demonstrated the critical role of schools in providing consistent access to nourishing foods to students and their families, but it has also put extra strain on an already-burdened school food system, with severe labor shortages, supply chain challenges, and tight budgets. School food services staff continue to work tirelessly to feed their kids the freshest, healthiest foods possible in spite of all these challenges, but we need to make this goal easier.

The feasibility study would allow for school food systems to be able to test alternatives that would alleviate many of the issues aforementioned. This could decrease the burden of scratch cooking on school food authorities (SFAs), allowing more school districts of all income levels to improve the quality of their meals and have a health equity impact for the children receiving the meals. SFAs would have more healthy options because they wouldn't be forced to work with just heat-and-eat products.

This study would also test the scale of possible economic impact, generating skilled jobs if it aids in greater scratch cooking throughout the participating districts. This could also allow for greater food sovereignty within communities because it would increase their capacity to make their own choices in sourcing and preparation and allow for greater equity in sourcing. Schools would be better able to work with a variety of vendors that match their values, such as prioritizing purchases from BIPOC (Black, Indigenous, People of Color) producers.

The feasibility study being proposed would address a key barrier and provide valuable data to allow state agencies and school food service directors to move toward more whole ingredients and farm



NATIONAL  
FARM *to* SCHOOL  
NETWORK  
A PROJECT OF TIDES CENTER

GROWING STRONGER TOGETHER

to school, values-based purchasing. This is an approach that the entire nation can benefit from. We strongly urge the USDA to provide full funding for the proposed study.

Sincerely,

Karen Spangler  
*Policy Director*  
*National Farm to School Network*





## Letter of Support for the School Meal Crediting Feasibility Study

USDA Food & Nutrition Service  
1320 Braddock Place  
Alexandria, VA 22314

December 6, 2021

I am submitting this letter to express LunchAssist's strong support for the school meal crediting feasibility study proposed by Nourish Colorado and Groundwork Center for Resilient Communities based in Michigan. This is an innovative approach to making regulatory compliance easier for both State agency and SFA staff while working to make scratch cooking the norm in all US schools.

The COVID crisis demonstrated how critical schools are to providing consistent, nutrient-dense foods to students and families. However, the pandemic also placed extra strain on an already threadbare school food system. While school food services staff continue to find innovative ways to feed kids the freshest, healthiest foods possible, they are tired, confused, and overworked. We need to make this goal easier. It shouldn't be so difficult to feed children healthy food at school.

As a former school nutrition director, I know firsthand how much work it takes to prepare healthy meals from scratch. Both of the districts where I worked had vibrant farm-to-school programs where over 50% of the produce was locally sourced. One of the districts was awarded 13 Gold Awards of Distinction under the Healthier US Schools Challenge. I know firsthand that it is possible to innovate and create beautiful school nutrition programs if you have the knowledge, skills, and resources to navigate the complex labyrinth of USDA regulations.



In my current role, I lead an organization that supports over 3,000 school nutrition professionals throughout the country in their effort to comply with USDA regulations and serve healthy meals. LunchAssist helps schools make sense of USDA regulations, many of which are like "reading Greek phonetically" to those working on the ground (actual feedback from a school).

The small but mighty team at LunchAssist has a collective 75 years of school nutrition experience and includes four Dietitians. We are regularly contracted by schools and partner organizations to help credit recipes because there is so much confusion on how to do this. Why should an organization have to pay us to help them understand how many cups of vegetables are in their salad? Isn't this a bit overkill?

The feasibility study being proposed would address key barriers that make school meal crediting a big challenge for program operators and partner organizations. It would make it easier for state administrators and school nutrition directors to serve healthy, whole foods to kids. It would save time, money, and help schools focus on what matters most.

I look forward to a day when all children benefit from a simplified approach to school meal crediting. I strongly urge the USDA to provide full funding for the proposed study and fully support this project.

Sincerely,

Jennifer McNeil, RDN, SNS  
Co-founder, LunchAssist  
jennifer@lunchassist.org  
(760) 518-4706