March 14, 2014

The Honorable Craig Rice, President
The Honorable George L. Leventhal, Vice President
Montgomery County Council
100 Maryland Avenue
Rockville, Maryland 20850

Dear Mr. Rice and Mr. Leventhal:

Thank you for your letter of March 10, 2014, in which you share recommendations for changes in the school meals program proposed by Real Food for Kids—Montgomery. I understand that these recommendations will be discussed during the Montgomery County Council Joint Health and Human Services and Education committee session scheduled for Thursday, March 20, 2014. Board members Shirley Brandman and Patricia O’Neill; Mrs. Marla R. Caplon, director, Division of Food and Nutrition Services (DFNS); and I will be present to participate in the session.

The members of the Board of Education and I are committed to a comprehensive approach that supports a healthy school environment and to improving programs that address the latest health and nutrition findings. We have been consistently focused on creating and implementing initiatives for the health and well-being of our students. The Board of Education is scheduled to discuss the school meals program at the June 3, 2014, Board meeting and would invite you to attend this meeting. We will review the recommendations of Real Foods for Kids—Montgomery as part of this discussion. This discussion also will include the cost of making any changes to the school meals program. As you know, DFNS is a self-supporting enterprise fund. We already have added substantial costs to the program to improve the quality of the meals that we serve, including $516,000 for the inclusion of whole grains in our meals, and $560,000 for expanding the availability of fruits and vegetables. The Board of Education has to consider the costs of any recommended changes to the program.

Dietary habits that contribute to students’ learning, achievement, and lifelong health are influenced at school. Nutrition education equips students with the knowledge and skills that provide a foundation for healthy nutrition. Our school meals program is nationally known for its foresight and for being an integral part of the students’ school day.

MCPS’ responses to the recommendations of Real Food for Kids—Montgomery are enclosed. I look forward to seeing you on March 20.

Sincerely,

[Signature]

Joshua P. Starr, Ed.D.
Superintendent of Schools

JPS:ls
Enclosure
Copy to:
Members of the Montgomery County Council
Executive Staff
Mrs. Lazor

Members of the Board of Education
Mrs. Caplon
Mr. Ikhe loa

Office of the Superintendent of Schools
850 Hungerford Drive, Room 122 ♦ Rockville, Maryland 20850 ♦ 301-279-3381
Montgomery County Public Schools Responses to
Real Food for Kids–Montgomery Recommendations

Recommendation 1

Wellness Committee. The MCPS Wellness Committee should be re-formed and should include all major stakeholders, including representatives from local community and non-profit organizations that work on issues related to school wellness. The committee should be composed at minimum of 50% parents, selected through an unbiased application process with representation from each cluster and meet at least quarterly. The staff member charged with operational oversight over the formation and implementation of the wellness policy and committee should neither be subordinate to nor an employee of any department or employee responsible for implementation of the policy. The committee should be chaired by a member of the Board of Education.

Response

Board of Education Policy JPG, Wellness: Physical and Nutritional Health, and MCPS Regulation JPG-RA, Wellness: Physical and Nutritional Health, have been in place since 2006. Regulation JPG-RA was revised in March 2012. Wellness policies throughout the state of Maryland are being reviewed currently by the Maryland State Department of Education in conjunction with the University of Maryland to assess the comprehensiveness and status of implementation. This is the second review conducted since 2006.

The United States Department of Agriculture (USDA) is in the process of publishing final regulations on the requirements included in the Healthy Hunger-Free Kids Act of 2010. The Division of Food and Nutrition Services (DFNS) is expecting final language on the Smart Snack regulations soon. USDA just published a proposed regulation, Local School Wellness, on February 26, 2014, that provides regulatory language specific to the writing, implementation, and enforcement of wellness policies. The rule specifies wellness policy leadership and public engagement in the development, and implementation and evaluation of wellness policy activities. Public comments to the proposed rule are due by April 28, 2014.

Montgomery County Public Schools (MCPS) has plans to reconvene a Wellness Committee, and Policy BFA, Policiesetting, will be followed in reconvening this committee. Based on the final language of the USDA regulations, the committee will include a variety of stakeholders and have representation from our student and parent community.

Recommendation 2

Free, Unlimited Water. MCPS should implement a system-wide solution for easier access to free, unlimited water in cafeterias (involving something to drink it with other than multiple trips to the water fountain).

Response

Section 203 of the Richard B. Russell National School Lunch Act requires that schools participating in the National School Lunch Program make potable water available to children at no charge in the
place where meals are served during the meal service. Availability of drinking water currently is a practice that is to be followed at all MCPS schools. Students are able to access water in drinking fountains, and if drinking fountains are not available, students are provided with cups and water containers in the dining area. The Department of Facilities Management reports that all water fountains in areas adjacent to or in the cafeteria are approved for safe drinking.

**Recommendation 3**

**Scratch-Cooked Food.** MCPS should immediately begin the process of moving from processed, pre-plated and reheated food to food cooked from scratch at the central facility with more prep work done on site at schools with kitchens. At least one meal per day should be offered that is not a typical “junk food” (i.e., not chicken nuggets, pizza, hot dogs, burgers, fries) with an eye toward drastically reducing these options to no more than once or twice a month.

**Response**

Menus planned and meals served by DFNS exceed the USDA guidelines and are intended to provide a variety of menu items that are acceptable to a diverse student population. Choices on the menus must be appealing to students and also must be affordable. The Central Production Facility was built in 1995 and was designed to provide nutritious meals with standardized quality meeting stringent food safety standards, while controlling labor costs. Centralizing the food preparation provides cost avoidance in utilities, space, equipment, and services associated with operating fully functioning kitchens in schools. Many items prepared in the Central Production Facility are from scratch, including entrée salads, soups, salad dressings, casseroles, several entrée items, and baked poultry items.

The terminology of “junk food” used by the Real Food for Kids–Montgomery is subjective. There is a misconception that food items served in schools are the same as what would be found in a commercial restaurant. MCPS has specific standards for food items that limit the fat and sodium content. For example, pizza served in MCPS has a whole grain crust and is low in sodium and fat. Hot dogs, served on a whole grain bun, are a turkey product to reduce the fat content. Hamburgers are low in fat and sodium and are served on whole grain buns. Chicken nuggets have a whole grain breading and are baked, not fried. The DFNS production facility that currently is under construction is planned to reduce the use of commercially prepared menu items. There is expanded space and equipment for preparation and packaging of fresh fruits and vegetables, as well as the required space to safely handle and prepare fresh meats and poultry. School kitchens do not have the capacity in preparation space and equipment or in storage space and equipment to fully prepare menu items “from scratch.” Additionally, the labor and food costs in such an operation are prohibitive and could not be recovered in the price of the meal, as expected in the enterprise operation.

Obtaining customer feedback is very important to the success of the program. Focus group meetings are conducted with students to obtain feedback on various menu offerings. New menu items are tested with students to determine acceptability. DFNS staff attends school staff meetings and Parent Teacher Association meetings to discuss menu options and provides nutritional information and sample menu items.
Recommendation 4

Dangerous Chemical Additives. MCPS should remove all chemicals listed as “caution” or “avoid” by the Center for Science in the Public Interest from all food served in MCPS.

Response

All foods and beverages available to MCPS students follow the regulations for food additives as specified by the Food and Drug Administration. The specifications for foods and beverages purchased limit food additives and colorings when appropriate. DFNS staff continually collaborates with food manufactures to expand the availability of products limiting additives when possible.

Recommendation 5

Sugar. MCPS should set an upper limit for sugar in any product served in MCPS based on limits for children recommended by the American Heart Association.

Response

Sugar is a natural ingredient found in many food items. Sugar is limited in the recipes for food items prepared at the Central Production Facility. Non-sweetened cereals are purchased and sugar packets are not available to students. However, a syrup packet containing one tablespoon of syrup is provided to students when whole grain pancakes and whole grain French toast is on the menu. Sugar content of foods served outside of the school meals program is compliant with MCPS Regulation JPG-RA, Wellness: Physical and Nutritional Health, which states “Sugar: Total sugar must be under or equal to 35 percent by weight (includes naturally occurring and added sugars). Excludes naturally occurring sugars in fruits, vegetables and milk.”

MCPS limits the sugar content in foods and beverages sold to students throughout the school day and is in compliance with the recommendations of the American Heart Association. The following information is from the American Heart Association:

- Naturally occurring sugars and added sugars
  - There are two types of sugars in American diets: naturally occurring sugars and added sugars.
    - Naturally occurring sugars are found naturally in foods such as fruit (fructose) and milk (lactose).
    - Added sugars include any sugars or caloric sweeteners that are added to foods or beverages during processing or preparation (such as putting sugar in your coffee or adding sugar to your cereal). Added sugars (or added sweeteners) can include natural sugars such as white sugar, brown sugar, honey, as well as other caloric sweeteners that are chemically manufactured (such as high fructose corn syrup).
  - You can use sugars to help enhance your diet. Adding a limited amount of sugar to improve the taste of foods (especially for children) that provide important nutrients, such as whole-grain cereal, low-fat milk or yogurt, is better than eating nutrient-poor, highly sweetened foods.
A person’s discretionary calorie budget varies depending on how physically active they are and how many calories they need to consume to meet their daily nutrient requirements. The American Heart Association recommends that no more than half of a person’s daily discretionary calorie allowance be spent on added sugars.

Recommendation 6

Vending and A La Carte (Snack) Offerings. MCPS should replace items on current vending and a la carte list of foods and beverages with healthier choices (i.e., items without artificial colors and flavors, low in sugar, high in fiber).

Response

Foods and beverages available in vending machines and a la carte choices in school cafeterias are compliant with MCPS Regulation JPG-RA, Wellness: Physical and Nutritional Health. Guidelines provided in the regulation include portion size, calories, percent calories from sugar, and fat and sodium content. Purchases from vending machines containing foods and beverages that are not in compliance with the regulation are not available until 30 minutes after the end of the school day. The language in the USDA Smart Snack Regulation, yet to be finalized, is the first time in history that USDA has created guidance for foods and beverages sold outside of the school meals program. The proposed regulations mirror practices that have been followed in MCPS since 2006 with the exception of one item: The availability of noncompliant foods and beverages not be made available until 30 minutes after the end of the school day. Although this is not a requirement until school year 2014–2015, MCPS implemented this change at the start of the current school year, a year earlier than required.

Recommendation 7

Transparency and Communication. All items sold and served to children in any school in MCPS’ cafeterias or snack carts or shops should appear on the monthly menus. In addition, at the beginning of each school year, each school should send parents a list of a la carte items sold at that school with information on how to block children’s lunch accounts to prevent a la carte purchases.

Response

DFNS strives to meet the nutritional needs of all students. In elementary schools, there are two entrée choices daily. In an effort to accommodate students who prefer not to eat meat, a third meatless option is offered each day. Additionally, a vegan option is offered daily. The published menu informs parents that alternative items are available and the school cafeteria manager should be contacted for specifics.

The published menu informs parents that a la carte items are available for purchase and recommends that the school be contacted for specific items available at their child’s school. Parents also are informed that their student’s account may be blocked, which would prohibit their student from purchasing a la carte items. A large variety of a la carte items are available to schools to choose from when deciding what items will be sold, the frequency, and the grade levels of the children eligible to purchase the a la carte items. Determination of what items are available at each school is made by various stakeholders, including wellness committees, school administration, student groups, etc. The
Enclosure

variance of products available at each school makes it impossible to provide a school-specific list on the menu or the DFNS website. Many schools currently send information regarding a la carte choices home with students via backpack distribution or list them in the school newsletter. Parents are able to access nutrient and allergen information on the DFNS website for all foods and beverages available through the school cafeteria. The DFNS website may be accessed at the following link:

www.montgomeryschoolsmd.org/departments/foodserv

In addition, should a student require a special diet for allergy and/or medical needs, registered dietitians on staff with DFNS will meet with the student, staff, teacher, and others involved to develop an appropriate meal plan.

Recommendation 8

**Unlimited Fruits, Vegetables or Salad Bars.** MCPS should offer unlimited fruits and vegetables free to all children who purchase lunch, preferably in some type of self-serve bar format. Fruits and vegetables should be in form that is age-appropriate and easy to eat (i.e., oranges should be peeled and apples should be sliced for elementary-age children).

**Response**

Salad bars, as part of the lunch meal, are available in many schools, including elementary schools. All school serving lines offer a variety of fresh fruits and vegetables each day as part of the lunch meal and students are encouraged to select fruits and vegetables as part of their meal. As a way to help educate students on the importance of fruits and vegetables, colorful line signage identifies fruits and vegetables on the serving lines. Apple slices are packaged, baby carrot sticks are offered, green peppers and cucumbers are presliced, and cherry tomatoes are served, making it easy for even the youngest of students to enjoy.

*The Healthy Hunger-Free Kids Act of 2010* stipulates that meals must have a minimum and maximum number of calories. Permitting students to take unlimited quantities of fruits and vegetables would put us out of compliance for the caloric requirements and does not support the importance of a balanced meal with appropriate serving sizes.