

FNS Comment Coding and Analysis

**Proposed Rule on Nutrition Standards for All Foods Sold
in School as Required by the Healthy, Hunger-Free Kids
Act of 2010**

**Draft Content Analysis Report of Public Submissions
Coded to Section 20.11 - Paperwork Reduction Act**

Docket FNS-2011-0019

May 22, 2013

**Prepared by
ICF Incorporated**

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Section 20.11 - Paperwork Reduction Act

Comment Number: FNS-2011-0019-0447-1

Organization:

Commenter: US Citizen

Commenter Type: Parent or Private Citizen

Classification: Other Unique Submission

Other Sections: 18.4.1

Comment Excerpt Text:

How much more idiotic can the government be? Schools are already having problems making ends meet and now you want to make more idiotic rules that will do nothing but will cost schools \$127 million and require more than 926,000 hours of paperwork...and of course, that cost will be passed on to the already overburdened tax payers. Enough is Enough, stop wasting our money on your asinine projects!

Comment Number: FNS-2011-0019-1102-1

Organization: martin mill isd

Commenter: Andy peters

Commenter Type: Parent or Private Citizen

Classification: Other Unique Submission

Other Sections: 5.1 18.4.2

Comment Excerpt Text:

These rules are only going to make matters worst as the kids will just bring food from home and have as much junk as they want right now. 25% of the students being overweight because of being couch potatoes should not control the thought process for 74% of active kids who needs their calories. If all the parents are going to do is pick the students up after school and go to mcdonalds that doesn't help the district fund balance only The schools tax base a little but its still tax payers money. The government making decisions on ala carte is going overboard. The amount of paperwork has tripled and crippled most schools to.the point where no one even cares abt The quality of food because they don't have time to manage anymore. What happened to paperwork reduction? These rules hasn't helped one child yet but has driven up costs and parents having to spend more money afterschool. Get out if the office and go.see the results of all this paperwork and less participation.

Comment Number: FNS-2011-0019-1180-1

Organization: USD 253

Commenter: Melodi Bowen

Commenter Type: School Food Service Staff

Classification: Other Unique Submission

Other Sections: 1.2 5.1 18.4.1

Comment Excerpt Text:

These rules are only going to make matters worst as the kids will just bring food from home and have as much junk as they want right now. 25% of the students being overweight because of being couch potatoes should not control the thought process for 74% of active kids who needs their calories. If all the parents are going to do is pick the students up after school and go to mcdonalds that doesn't help the district fund balance only The schools tax base a little but its still tax payers money. The government making decisions on ala carte is going overboard. The amount of paperwork has tripled and crippled most schools to.the point where no one even cares aboutt The quality of food because they don't have time to manage anymore. What happened to paperwork reduction? These rules hasn't helped one child yet but has driven up costs and parents having to spend more money after school. Get out if the office and go.see the results of all this paperwork and less participation.

I agree in most part about the above comment from another person on this site ...I agree that our children need to

eat more healthy as do all of us .. but don't put the problem of American society's laziness on the hardworking lunch lady .. my ladies her are compassionate and caring .. they love these kids .. but you have just about over worked our whole group.... shame on you ..

Your going to get us all to the point that we don't care anymore and that will be a shame...with school administration riding us about cost and you on the band wagon about getting done .. we have been rode hard and put away wet.

thank you for your consideration

Comment Number: FNS-2011-0019-1319-1

Organization: Brandon Valley School District

Commenter: Gay Anderson

Commenter Type: Parent or Private Citizen

Classification: Other Unique Submission

Other Sections: 5.1 18.4.1

Comment Excerpt Text:

I am very concerned about the proposed competitive foods rule in regard to being able to run a financially sound school lunch program for my district.

We are a district of 3500 students and 6 schools and the additional revenue we draw on our ala carte items is what helps keep the program costs down for families who need it and supplements the meals of those still hungry.

Please allow us to serve the children in our schools what they want and need and let us be the guiding source. We all want healthy children and we will be prudent in our decision making practices

The additional paperwork which will be required is immense and would prove to be costly and for what real purpose

Comment Number: FNS-2011-0019-2615-1

Organization:

Commenter: Gwen McCaulley

Commenter Type: Parent or Private Citizen

Classification: Other Unique Submission

Other Sections: 5.7

Comment Excerpt Text:

We need to educate our kids first. Change their habits. They will get done with school go home and eat junk. How about the concession stands at school games. They should be resticted too. Why let them sell candy in the building? What message is that? Can't for lunch, but okay at your game. This is a ton of paperwork and extra time that we need to spend on it. Adding to the burden our our limited resources. With the added restrictions we wont be able to serve much. more and more students will bring lunches from home. There is no restrictions on those. We cannot compete.

Comment Number: FNS-2011-0019-2640-1

Organization: Andover Unified School District #385

Commenter: Jim Freeman

Commenter Type: Parent or Private Citizen

Classification: Other Unique Submission

Other Sections: 1.2 5.1 5.2

Comment Excerpt Text:

These regulations, just like the new meal patterns, would be very restrictive for after school sales, A La Carte programs, school stores, etc. What is worse for schools is that the regulations will bring increased paperwork with label reading, along with mandated portions and nutritional guidelines.

We should promote healthy snack options, but to have stringent mandated guidelines without education or support would be difficult to understand and labor intensive. This doesnt seem to make sense.

Comment Number: FNS-2011-0019-2724-1

Organization:

Commenter: Vicky Kirby

Commenter Type: Parent or Private Citizen

Classification: Other Unique Submission

Other Sections: 1.2

Comment Excerpt Text:

After reading through these proposed regulations, i am not sure how i will ever get anything else done. It will take hours every day just to be sure that all of the rules are being followed. We are all about feeding children healthy foods. That purpose can be done and has been done for years without all of the regs that are being proposed. If a hamburger or grilled chicken patty is heathy enough on Monday, why is it not good enough on Friday? Do you have any idea how many extra labor hours that will be taken away from managers just to follow that one rule? Not only will the program suffer from loss of income, it will suffer from loss of management having a hands on advantage of what is going on in the kitchen, because they will be to busy making sure the rules are being followed. We live in a rural state and do not have the privilage of having an RD or manager that can only sit in an office doing paper work. Please reconsider some of these regulations that will cause so much more paperwork.

Comment Number: FNS-2011-0019-3747-1

Organization: Sherman County School District

Commenter: Ree Ella von Borstel

Commenter Type: Parent or Private Citizen

Classification: Other Unique Submission

Other Sections: 15.4

Comment Excerpt Text:

There is point to where we are being to regulated. You can not force a public to do things by over regulating. Education and choices are what we should be about, not regulations. This is democracy not a dictatorship. The Food Service Department of the schools should not be the regulatory arm of the government for this either. We have enough to do without dealing with this. Get the school boards and administrators on board with this and have them be the bad guys.

The government is so clogged up with regulations and do gooders who think they know what is best for everyone and everthing that it is clogging the system with unneeded paper work and policing on matters that cause conflict and unhealthy feeling towards our schools.

The meals at the schools are so much healthier. Give guidelines to the other foods sold at the schools, but stop regulating everything. People find ways to get around the rules and our administrators and food service are too busy to police these activities.

STOP REGULATING!!!!!!!

Comment Number: FNS-2011-0019-4326-11

Organization: Columbia Public Schools

Commenter: Laina Fullum

Commenter Type: School Food Service Staff

Classification: Substantive

Other Sections: 15.4

Comment Excerpt Text:

Record keeping:

Each district food service already hoards a forest worth of paperwork and record keeping in their facilities. I want my employees and I to focus on food quality, and safety, not paper work. Reimbursement from USDA is not even close to covering the increased cost that is inferred between the lines of this proposed rule. USDA is not the only agency imposing new rules and laws we must comply with. All government agencies should have a limit in its entirety of what they can hold any agencies and organizations accountable for. No district is gaining more staff, just more paper work and oversight burden.

The Paperwork Reduction Act: My last question is how is this new proposed rule in compliance with this law? Printing this proposed rule alone is a crime.

Comment Number: FNS-2011-0019-0532-2

Organization:

Commenter: Laura Stewart

Commenter Type: Dietician/Nutritionist

Classification: Substantive

Other Sections: 15.4

Comment Excerpt Text:

2. Requiring non-school food service staff to maintain records concerning what competitive foods were sold for fundraisers is simply too much. Right now, I have 1 person working 8 hours per day just trying to maintain the nutritional information we use in our menu planning database. I also have 8 managers spending 3-4 hours per day maintaining production records. I also have 1 additional office staff and myself assisting in the maintenance of those records. To ask a volunteer parent or a teacher who is just trying to raise funds to give her/his students an opportunity to participate in a competition or educational exercise that should already be funded by school resources to have to maintain the same type of records school food service does is ridiculous. The end result of this law is that it will be unenforceable. There is no way that teachers and administrators will be able to properly keep the records. As a result many will not attempt to do so or teachers and administrators will refuse to do fundraisers simply because they do not have the time to do administrative work that will be required of them.

Comment Number: FNS-2011-0019-1030-32

Organization: School Nutrition Association

Commenter: Sandra Ford

Commenter Type: Professional Association

Classification: Substantive - Key Stakeholder

Other Sections: 15.4 15.2.3 16.3

Comment Excerpt Text:

Recordkeeping and Monitoring Requirements

Proposed Rule - The proposed rule imposes recordkeeping requirements on local educational agencies (LEAs) for foods provided in areas outside of the control of the school food service operation, including for school stores, vending machines, concession stands, fundraising events held on campus, snack bars, etc. [Footnote 22: Proposed rule at 7 CFR 210.11(b)(3).] LEAs must require that, at a minimum, receipts, nutrition labels or product specifications must be maintained by those designated as responsible for competitive food service at venues throughout the school.

SNA Recommendations –

1. As part of these requirements, SNA is concerned about the need to train and educate non-SFA personnel as to how to comply with the regulation. We encourage FNS to be mindful about the budget and labor constraints SFAs already face. Absent additional funding for this training activity, we expect many will be depending upon FNS to provide clear, concise, and helpful materials. Specialized technical assistance and guidance will be needed because many SFAs will effectively be put in a position of training people with little or no food service

background or experience. This is particularly difficult given that these other personnel are not under the SFA's authority.

2. We also recommend that, with FNS assistance, States develop a hotline for handling compliance issues as it would alleviate time and labor burden for SFA staff during the transition time.

Comment Number: FNS-2011-0019-2124-28

Organization: Chartwells School Dining Service

Commenter: Steven Nachimson

Commenter Type: Food Service Industry

Classification: Substantive - Key Stakeholder

Comment Excerpt Text:

Another potential consequence of the addition of competitive food rules to the already complicated new meal pattern is that food service directors and registered dietitians will be burdened with additional administrative functions. The additional paperwork will reduce the time they take for other duties such as consistent meal quality, food safety, and nutrition education.

Comment Number: FNS-2011-0019-2124-4

Organization: Chartwells School Dining Service

Commenter: Steven Nachimson

Commenter Type: Food Service Industry

Classification: Substantive - Key Stakeholder

Comment Excerpt Text:

Another potential consequence of the addition of competitive food rules to the already complicated new meal pattern is that school food service directors and registered dietitians will be unreasonably burdened with additional administrative functions. The additional paperwork and record keeping will reduce the time available for other important duties such as maintaining consistent meal quality, food safety, student satisfaction, and nutrition education