

Thank you Madam Chair and Committee members for the opportunity to share with you today. My name is Jessica Gould and I am a registered dietitian and the director of nutrition for Littleton Public Schools in Littleton, CO. My district has approximately 15,000 students with 21 schools with full service kitchens. We are 18% F/R.

I want to start today by saying thank you for focusing on Child Nutrition Reauthorization.

When the Healthy, Hunger-Free Kids Act became law, child nutrition operators were excited and anxious because we agreed with many of the changes for our program and we had many challenges ahead of us. I am excited to share that our students finally understand that fruit and vegetables make a meal and students are enjoying and eating the options that we are providing. This year in my district we are operating SFSP and we actually didn't change the requirements of fruit or vegetable since it was working and we didn't want to create confusion. We have not had any issues.

We have seen this year that the waivers that eliminated area eligibility and allowed students to take non-congregate meals for multiple days have been incredibly advantageous for our students and families. My district has operated k-5 in person, hybrid, fully remote and now we are back fully in person and these flexibilities helped ensure we were able to provide access to meals to all students. I know that students are in need at every school regardless of their F/R percentage and I have not seen this taken advantage of, however the gratitude of my families that I am able to meet with in their neighborhood is overwhelming. I believe as you look at CNR, these flexibilities to ensure we are providing access to all our students is important.

As a CN operator, I also request that we maintain the current flexibilities on sodium, whole grains and milk. Operators across the country are committed to serving our students nutritious, well balanced meals. Meeting Tier 2 and very soon Tier 3 sodium poses serious concerns for our programs and ultimately students. How many of you enjoy lettuce, tomato and pickles on your hamburger or cheeseburger? For my program to meet Tier 1, we have had to create a vegetable serving of these three items and have to limit the pickles to only 2 pickles to meet regulatory requirements. Our students are used to this now, however I also see many of them leave campus and go to fast food restaurants instead of dining with us because they believe our food doesn't have enough flavor.

Tier 3 sodium is incredibly concerning to me. Many meal staples like a turkey and cheese sandwich on whole grain bread, chicken breast salad without dressing or any of our scratch made items including our students favorite marinara would be cut. As we all know, sodium is naturally occurring in many of our common foods. After removing the roughly 125mg of sodium from our milk we would be left with 515mg for a fruit, vegetable and entree (640 maximum for k-5). We have also determined that offering any protein options for breakfast would not be allowable when required to meet tier 3 sodium.

This change would also have a significant impact on our vegetarian options that we provide. Many of these items are made with legumes or cheese which would have to be cut from our menus. Even our sunbutter and jelly sandwich would not be allowable. Offering variety would be a thing of the past in our programs.

We are seeing more and more manufacturers leaving the industry due to the constant changes within our program. For the manufacturers that are sticking with us, yes they can work on reformulation of products; however, the costs of that process will eventually hit the school nutrition programs which are currently critically suffering with our budgets. And, who is to say that the final product that they create is palatable for students. Our meals are not nutritious until they are in the bellies of our students.

In LPS we are at 75% of our grains as whole grain. I request to keep the grain requirements at 50% because it allows for regional items to be offered and accepted by students.

From biscuits in the south, to tortillas here in Colorado, this option allows us to continue providing meals our students love and will eat. In LPS we also use the waiver for our pastas. We make a few different scratch made pasta bakes and whole grain pastas do not hold well at all. These recipes were brought back after the WG requirement changed to 50% because when we created them with WG pasta I received calls from principals and parents and had student groups writing me letters requesting to “go back to what we previously served” because the pasta bakes were inedible otherwise.

These are just a few examples of why it is critical for our programs participation and ultimately sustainability to keep these regulations where they are. In my district where many students can choose to eat with our program, we believe if required to implement tier 3 we will not survive.

I could go on and on and also respect your time and my time limit. I am happy to answer any questions you may have from an operator’s perspective.

Thank you.