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Jane F. Wiggins, Ed.S., R.D., L.D.
Director, School Nutrition Program

April 19, 2000

Director
Food Distribution Division, Food and Nutrition Service
3101 Park Center Drive
Alexandria, VA 22302

Dear Director:

As school nutrition professional I want to commend your efforts to change USDA food distribution. However, I have some reservations about the speed of this change and some of the proposed changes. I also have some questions about where the problems and concerns regarding USDA commodity foods came from. I personally never received any surveys about the commodity food program. Most of the problems identified are not a problem in Georgia.

I would like to address each of the 16 proposed improvements. Item number one the expansion and use of long-term contracts, I feel would be of benefit. Item number two test best value contracting should work as long as the company's reputation is investigated.

Number three I have some concerns. If you align the product specifications with industry standards you may lower the quality of the USDA commodities or provide products that the schools do not want. Some of examples of this would be ground beef-industry standard is 30% fat, USDA standard is 15-20% fat. Industry standard for canned fruit is in heavy syrup-USDA standard is light syrup. We have tried very hard to reduce the fat and sugar content of our school lunches.

Number four sounds good in theory using commercial labels and we have had some experience with this for peanut butter, sliced cheese, and the DOD produce. The problem is keeping these items separate and accounted for. We are audited by OMB standards, which call for accurate record keeping of all inventories especially USDA commodities. I am concerned that it will not only be a problem at the school level but also at the distributors. How will everyone involved know which commercial products are USDA?

Number five moving toward a national umbrella contracts with processors sounds like a great idea but would be difficult to manage.

Number six expanding full substitutability of commodity product raises some questions. Where will the products come from? Who will guarantee quality? How do we know that the processor will not use high quality USDA products and substitute with lower

commercial quality products for the schools? Who will monitor them to make sure we get what is supposed to go to the schools? What happens to buy American?
Number seven has many of the same problems as number four. Work with the states to test the seamless commodity distribution concept. USDA products will come from the same distributor as commercial products. The boxes will look the same but will have different code numbers. Most school-level nutrition personnel do not have the time or the expertise to separate items by code numbers. Accurate record keeping will be a major problem.

Number eight I agree with facilitating the processing of commodities with limited demand. How will you determine which commodity items have limited demand?

Numbers nine, ten, and eleven are all good concepts on commodity holds and recalls. These have been implemented very successfully in Georgia.

Number twelve on computer connectivity is probably not necessary. Most schools have computers and are on LANs and WANs. The ordering of USDA needs to be done on a district level not on a school level. Most school food service operations are operated from the district level.

Number thirteen sounds good but how can one person handle all of USDA contact?

Number fourteen raises many questions. How can these proposals be pilot tested and implemented within six months? What states are being used for the standard? How were the pilot sites chosen? If there are states that have major problems why don't you work on those states? There are performance standards for state agencies, why are they not enforced?

Number fifteen is a good proposal for encouraging cooperatives and relaxing truckload requirements.

Number sixteen streamlining paperwork and reporting requirements always sounds good but usually is not a reality. USDA must remember that we are audited by OMB standards.

I would also like to know how all the data would be compiled and made available to everyone. We need to know what the objectives and outcomes are and they should be on the Internet. What is the baseline data for the pilot evaluations? These should be established and published before the pilots have started. There should be control groups for comparisons. Georgia would be an excellent control to compare the pilots.
Finally, I would hope that the comments submitted would be tabulated, listed, categorized by improvement actions and published.

Sincerely,

Jane F. Wiggins