AGENDA

1. Roll Call

2. Board Member Participation by Other Means

3. Public Participation

4. Minutes of the November Ad Hoc Rules Committee Meeting (pp. 2-7)

*5 Rules for Adoption
   a. Part 60 (The “Grow Your Own” Teacher Education Initiative) (Linda Jamali) (Plenary pp. 19-31)
   b. Part 70 (Early Childhood Teacher Preparation Assistance Grants) (Kay Henderson) (Plenary pp. 32-48)

6. Discussion Item
   a. Nutrition Programs (Chris Schmitt & Roxanne Ramage) (pp. 8-11)

7 Committee Agenda Planning/Additional Items

8. Adjourn

* Items listed with an asterisk (*) will be discussed in committee and action may be taken in the plenary session.
Vinni Hall called the meeting to order at 1:30 p.m.

1. PUBLIC PARTICIPATION: Daryl Morrison, representing the Illinois Education Association, provided that organization’s position on Part 226 (Special Education). With regard to the provisions on class size and case load, he described the large number of calls received from IEA members. He noted the great concern and considerable amount of misinformation among affected individuals. Mr. Morrison also mentioned the favorable position of the State Advisory Council on the Education of Children with Disabilities regarding these amendments. He pointed out that the IEA does not have any representation on that Council, stating that the IEA had recommended someone but that no appointment had yet been made by the Governor. In addition, the earlier task force on which the IEA had had representation had been divided on this issue and no agreement had been reached. He hoped the IEA members’ comments would be taken into consideration.

As to the change from 30 to 40 percent prevalence of students with disabilities in a “general education classroom”, Mr. Morrison indicated that “big things” might occur in districts. He noted that he had attended all but four of the hearings that had been held around the state and that teachers had repeatedly stated great concern for increasing class size and case load, as those changes would affect students in both general and special education. He reiterated the IEA’s opposition to the rules as they stood.

Sue Walter, union professional development director and staff liaison for special education of the Illinois Federation of Teachers, provided two hand-outs for the Board: (1) a written copy of the IFT’s testimony; and (2) a compilation of comments from general education teachers discussing the change from a 30 percent limit on special education students in a general education classroom to 40 percent. She noted that a recent article in the IFT publication had apparently prompted many responses and that the IFT strongly opposed the changes related to case load and class size, which are not related to the reauthorization of IDEA. She pointed out that students have come to require increasingly complex services and that the consequences for failure to make adequate yearly progress add to the pressure on educators. As proposed, she believed the rules would have the potential to negatively affect the quality of services. She highlighted the following additional points.

The rules permit use of the “discrepancy model” in identifying a specific learning disability only if Response to Intervention (RtI) is first used. The IFT recommends the option of using either approach at local discretion. Ms. Walter noted that the final federal regulations would allow this and stated that
Illinois should not exceed the federal requirements. The rules should not preclude appropriate decision-making, which might lead to either over- or under-representation.

She stated that the IFT also opposes the categorical class size changes and urges ISBE to maintain the current maximums, except that the limit for resource classes should be reduced to 15 in light of the diverse students served. The period-by-period basis stated in the rules could allow teachers to have unlimited caseloads, would be impossible for ISBE to monitor, and would therefore be susceptible to abuse. Ms. Walter also recollected her participation in the 2004 task force that had been unable to come to consensus on this issue.

Lydia Bullock, also representing the IFT, yielded her time allotment to Ms. Walter so that the latter could continue her remarks. Ms. Walter proceeded to outline further the IFT’s opposition to permitting general education classrooms to include as many as 40 percent students with disabilities, based on decreasing the quality of services to students with individualized education programs as well as those without IEPs. She read a comment from a high school mathematics teacher whose greatest frustration was the inability to give students the kind of attention they need, especially when large numbers of students have IEPs. In a class of 30 students, 30 percent equates to six to eight students. The general educator works with the special education teacher and also exercises “constant vigilance”, but should be doing more. This teacher expressed anxiety for the potentially dramatic effect of the proposed changes, stating that 30 percent already is a great challenge.

Ms. Walter went on to note that she had served as a special education teacher for 21 years and had been struck by the fact that not one of the letters had said, “These kids should not be in our classrooms.” All had been focused instead on meeting their needs.

Penny Richards, of the Learning Disabilities Association of Illinois, noted that she would not re-read the statement she had presented earlier during the meeting of the Educational Policy Planning Committee. She indicated that parents lack knowledge of what RtI means and that no timelines are provided, or information as to what will be examined. She stated that students can remain in “flexible delivery” for up to four years. Also, there is no accommodation for RtI students in higher education (because they are identified as “eligible” but not as having learning disabilities). She went on to state that, among the incarcerated population, there is a high prevalence of individuals with learning disabilities. As a surrogate parent for the Department of Corrections, she felt parents are refused services because RtI is in general education rather than special education, and that the only recourse is due process. Ms. Richards also indicted that a case load of 100 to 150 would result from the proposed rules. She concluded that the task force referred to previously had been disbanded because its members would not agree with ISBE’s position.

Finally, Ms. Richards indicated ISBE would not have to delete so much of the language from Part 226, indicating that all that is required is to report to LEAs on the rules that exceed federal requirements...

Susy Woods, vice chairperson of the State Advisory Council, indicated that she took the opportunity to comment very seriously and wanted to offer clarification regarding the Council’s position on case load and class size. She noted that information may be changed as it is repeated, and that the Council supports the spirit of the rule changes, acknowledging that the document is not perfect but represents a compromise among all who want to shape it. She considered the amendments a “brave attempt” to move away from categorical labels, which she believed to be essential. The approach taken was stated to be a different way of thinking, and she noted that it would be impossible to look at the entire field of special education and find agreement. She pointed out that the Advisory Council includes quite a variety of people and that, on balance, the Council supports these rule changes, emphasizing also that the changes must be implemented correctly.

Charlotte Desjardins, Executive Director of the Family Resource Center on Disability, indicated that the role of these centers is to make sure families understand their rights. She described receiving more than 4,000 calls per year over a period of many years. She stated that this was not the first
time a different proposal had come up, indicating that ideas had surfaced over and over to expand class size and case load. She exhorted the Board, “Do not be the first Board to accept these changes.” She went on to remind the Board that students are placed in a special education classroom as a last resort, when their needs are too complex or unique to be served in the general education classroom. Inclusion in general education is the best option when feasible, but it is not always feasible. She urged the Board to think about the impact on students with severe or profound needs and not to believe money could be saved by cutting services to them. She described it as simple common sense to invest in their future today, because that would save money in the long run.

2. MINUTES OF THE OCTOBER AD HOC RULES COMMITTEE OF THE WHOLE
Brenda Holmes moved that the minutes of the October meeting of the Ad Hoc Rules Committee of the Whole be approved. Dean Clark seconded the motion and it carried on a voice vote.

3. DISCUSSION ITEM
With the Board’s permission, Agenda Item 4 was moved forward and addressed prior to Agenda Item 3, so that Dr. Koch could provide an update on the rules for Special Education (Part 226). Dr. Koch was joined by Beth Hanselman, Division Administrator for Special Education Services in Springfield.

Dr. Koch began by noting it was exciting to be a part of special education at this time because so many people care about it. He went on to note that some 70-75 percent of the comments received on the proposed amendments related to case load and class size, characterizing this as a “lightning rod” issue. He reminded the Board of the informational steps that the agency had taken, including the public hearings and a variety of presentations. He recapped the five questions that had guided the development of the proposed amendments:

1) Does the current rule duplicate federal language?
2) Does the rule offer express protection to students?
3) What need for regulation is indicated by our experience in general supervision?
4) What has been the thrust of public comment in the past?
5) What does research show?

Dr. Koch emphasized that financial aspects had not been part of the criteria as some seemed to suppose. He noted that this was not the first time people had said there were too many regulations and noted that HR 359 had caused review efforts along these lines to begin several years previously. He also noted that changing the 1970s version of some provisions in the rules would be difficult because it was “tenacious” and expressed his understanding of the fact that not all the parties would agree to the changes. He expressed his respect for Mr. Morrison and Ms. Walter and wished to state in defense of the State Advisory Council that there had, in fact, been two teacher members until August and that other vacancies on the council also exist, including one for a special education director.

Dr. Koch wished to dispel one of the “myths” that were consistently relied upon by commenters, i.e., that repetition in the rules enhances protection. He pointed out that federal law and regulations carry sufficient weight on their own and that a reduction in the volume of Part 226 would not reduce any protection for students. He acknowledged that making sure everyone knows about the underlying requirements and follows them is another big job. He went on to note that the final version of the federal regulations was very close to the version that had been originally proposed and that, in any case, the State Board would have had no opportunity to change any federal provisions through this rulemaking. The only latitude that exists with respect to ISBE’s rules is to go beyond the federal requirements where that is deemed appropriate, not to diminish those requirements.

On the subject of Response to Intervention, Dr. Koch agreed that it could be confusing to parents but stated that it was also confusing to parents not to know, even after an IEP meeting, the reading level of their children. The majority of students, he indicated, have either learning disabilities or speech/language problems. Reading is very important to their education, and it is important to use standards in measuring their learning. Dr. Koch stated that it had been proven again and again that
the greatest gains are not realized when students are placed separately and without access to the general curriculum. Further, RtI does not imply a delay in referral, which parents can make at any time. RtI is one of a menu of scientifically based approaches, and he indicated that ISBE would provide guidance on its application.

Dr. Koch then summarized the major changes being made with regard to case load and class size.

1) **Definition of “General Education Classroom”:** This definition had its origins in the Corey H. litigation and related monitoring issues. Dr. Koch stated that there have not been many complaints regarding violations of the 30 percent maximum and acknowledged that this may not be a true indicator because teachers may be concerned about retaliation. He noted further that the term “case load” is not actually defined and therefore means different things in different schools. He stated that all sorts of factors affect what case load is acceptable in particular circumstances and that the fundamental question must be whether the students are receiving the services set forth in their IEPs.

2) **Categorically Stated Class Sizes:** Dr. Koch noted that these provisions were a product of the 1970s and that districts frequently indicate they are no longer dealing with students in this manner. He affirmed this would not mean categorical classes are to be eliminated altogether, because the full range of placement options must be maintained. He further pointed out that a number of states do regulate class size and then summarized the existing provisions of Section 226.730. That rule currently lays out 17 categories of students, each with three potential limits on class size (the basic limit, the limit increased for unique circumstances, and the limit with a paraprofessional). Dr. Koch pointed additionally to the current requirement that each class size be driven by children’s needs, stating that that rule would continue to be in place. He agreed with the earlier statement that there is no magic number. What was done in the proposed amendments was to eliminate the top and bottom extremes of the range, so it should be evident that there would be some “winners” and some “losers”.

Dr. Koch then outlined some of the specific changes involved and went on to point out that students with the same disability do not all have the same educational needs. That is, each student’s placement is a function of the IEP, not of the disability type. An additional factor that is relevant in this connection is the Court Monitor’s interest in this rule because of its relationship to the least restrictive environment. Overall, the Monitor supports movement away from categorical determinations and may always weigh in on relevant rules. On a related note and with regard to the comments that stated students with disabilities would be “forced” into general education, Dr. Koch pointed out that federal law requires that first consideration be given to placement in the general education classroom with whatever supports and accommodations are necessary. Only if this placement is not feasible does consideration move away from the general education classroom.

The Board members then proceeded to discuss the issues that had been raised. Dr. Hall requested a set of the items of public comment, and Dr. Fields asked to what extent information had been shared with the IEA and the IFT. Dr. Koch responded by describing the various interactions but noted uncertainty as to how much is generally understood about enforcement and complaints.

Ms. Holmes asked why there was such an apparent lack of congruity between ISBE’s expectations for the implementation of these provisions and the level of concern raised in the field. In other words, she wished to understand what was causing the fear that the IEP would no longer control the provision of services. Dr. Koch acknowledged that there are concerns regarding enforcement and that the question was legitimate in terms of whether the general education teacher would get the support that is needed. He indicated that the same question exists now, so that one must ask whether the situation will get worse. However, he noted that the 40 percent maximum had been in place in Chicago for five years, so it needed to be clarified that the recent cuts in aides and teachers in the Chicago Public Schools were not related to this proposed rule change as some commenters had assumed. As to abuses, Dr. Koch pointed out that federal law includes safeguards but ISBE
needs specific information on which to base enforcement. Someone has to take the step of making a complaint when requirements are not being observed.

Dr. Hall followed up on the change from 30 to 40 percent, understanding that noncategorical placement has its points. Dr. Koch responded that nothing in the rules suggests ignoring a child’s diagnosis, only acknowledging that each child is different. Dr. Hall expressed concern for teachers who are required to address a wide variety of needs and the impact this load may have on all the students. It was noted that the 40 percent flexibility would exist in Chicago regardless of this rulemaking and that parents sometimes differ on where they would like their children to receive services.

Dr. Brown noted the importance of the context and recalled the early days of special education and the large element of distrust that existed in the late 1960s and 1970s. She indicated it would be unfortunate for these issues to become a power struggle between decision-makers at the state and local levels. She noted that lots of things may not be working at the desired level of quality and that class size is a problem everywhere.

Mr. Geppert discussed class size from the perspective of a general education teacher. He reminded his fellow Board members that more and more demands had been placed on classroom teachers in recent years. From his point of view, adding another demand would be unacceptable. He believed that the existence of the 40 percent maximum for Chicago was not a sufficient reason to extend that maximum throughout the state.

Ms. Holmes asked Mr. Morrison, Ms. Walter, and Ms. Desjardins to return to the table to provide their perspectives on this issue in terms of the discrepancy in assumptions about how the rule would work in practice. Ms. Desjardins stated that two different realities were being discussed. She noted that Dr. Koch had talked about what the rules call for, but the rules were only a piece of paper. The reality that parents confront is how the rules are implemented. If requirements are relaxed, the problems grow even larger, because the promised supports are not forthcoming. Contrary to what Dr. Koch had stated, her belief was that money is involved, particularly in the implementation of requirements.

Further, the more open to interpretation a requirement is, the more Ms. Desjardins believed it would be subject to problems. In response to a question from Dr. Brown, she replied that it is not a matter of trust but rather a matter of what is happening.

Ms. Walter agreed with this point of view but also noted that when an entity opposes a proposal it is well advised to offer an alternative that would be acceptable. She reiterated that the earlier task force had not found one. To Ms. Holmes’ probe as to whether the status quo were acceptable, Ms. Walter replied that IFT’s members would like fewer students per class because of their increasingly complex needs.

Mr. Morrison concurred and noted that Dr. Koch had said he would like to talk about the violations that were going on. In some cases, the prevalence of students with disabilities in general education classrooms was 50 or even 60 percent. IEA was concerned that it would be the unions that would eventually be called upon to regulate the system, i.e., through complaints and grievances.

Dr. Brown expressed partial agreement and noted that the “ideal situation” is not just to assess a child’s needs but also to understand the classroom into which the child may be placed. She stated that there must be an expectation for professional educators to have a commitment to serving the students and that numbers were a poor substitute for the overall context.

Mr. Geppert agreed that numbers are a poor tool but stated that they were the only tool available. He could envision granting exceptions on a case-by-case basis when districts were able to justify inability to observe the 30 percent limit, rather than opening the possibility of 40 percent to all 800 school districts, particularly in light of all the pressures districts are under.
Dr. Koch noted that nothing in rules could, in and of itself, end the kinds of scenarios that had been described, because ISBE can only investigate situations that are made known to the agency. He then moved on to note, with respect to the abbreviated format of the rules, that the promised side-by-side display of the Illinois rules and the federal regulations would be coming.

Ms. Hanselman offered two points for consideration. First was ISBE’s potential for communicating to parents how to bring issues of compliance to the agency’s attention. She noted the agency’s ability to assist parents in terms of better advocacy for services, supports, and training. Second, she pointed out that the entire responsibility for serving students with disabilities in the general education setting was never meant to rest on the general education teacher. The proposed rule did state that the special education teacher must be present and provide assistance such as differentiated instruction.

Dr. Dunn indicated his continuing support for the proposed amendments and pointed to the statutory role of the Advisory Council in commenting on rules. He stressed that ISBE had been open to hearing many points of view and that teachers’ voices had, indeed, been heard. In his view it was time for Illinois to “catch up with the rest of the nation”.

4. DISCUSSION OF RULES FOR INITIAL REVIEW

PART 1 (Public Schools Evaluation, Recognition and Supervision)
Mr. Reisberg noted that this set of amendments encompassed two separate aspects and turned the discussion over to Division Administrator Myron Mason to outline the first of these. Mr. Mason indicated that the revisions to the accountability framework were intended to conform those Sections of the rules to recent statutory revisions. For example, he pointed out that ISBE no longer is required to approve school improvement plans but does need to monitor their existence. He also discussed several electronic components of the accountability system such as the school improvement plan and information on adequate yearly progress.

Interim Division Administrator Linda Jamali then briefly summarized the new rule setting forth requirements for administrative and supervisory positions. These requirements were generally already found in an appendix to Part 1 which had, however, become out of date and difficult to read. There were no questions from the Board members on Part 1.

5. INFORMATION ITEMS
Mr. Reisberg indicated that the Board packet included a quarterly update on the comprehensive rules review and the resolution of “LessRedTape” communications. Ms. Holmes explored the possibility for some more detailed response when a legislative change would be needed in order to respond to a correspondent’s area of concern.

6. ADJOURNMENT
Dr. Fields moved to adjourn the meeting and Mr. Geppert seconded the motion. The meeting was adjourned at 3:10 p.m.
TO: Illinois State Board of Education

FROM: Christopher A. Koch, Ed.D., State Superintendent of Education (Interim)
Darren Reisberg, General Counsel
Linda Riley Mitchell, Chief Financial Officer
Chris Schmitt, Division Administrator, Nutrition Programs

Agenda Topic: Comparison of School Food Service Rules Part 305 and the statewide nutrition standard recommendations of the School Wellness Policy Task Force

Materials: Comparison Table

Staff Contact(s): Mark Haller, Division Supervisor, Nutrition Programs
Roxanne Ramage, Consultant, Nutrition Programs
Shawn Rotherham, Consultant, Nutrition Programs

Purpose of Agenda Item
The purpose of this agenda item is to provide the attached comparison table of the state School Food Service Rules Part 305 and the recently released statewide nutrition standard recommendations of the School Wellness Policy Task Force.

Relationship to/Implications for the State Board’s Strategic Plan
Proper nutrition can have a positive impact on student performance. Accordingly, the nutrition rules support the Strategic Plan’s goal of fostering literacy and enhancing literacy instruction.

Expected Outcome(s) of Agenda Item
The Board will be provided a comparison of the School Food Service Rules Part 305 and the recommendations of the Illinois School Wellness Policy Task Force for statewide nutrition standards. No action is requested at this time.

Next Steps
The School Food Service Rules Part 305 states that the Illinois State Board of Education (ISBE) shall initiate a revision to the food and beverage standards that respond to the Illinois School Wellness Policy Task Force’s report on statewide nutrition standards. Since the release of the Task Force’s report, staff is providing this detailed comparison between the current School Food Service Rules Part 305 and the recommended statewide nutrition standards of the Illinois School Wellness Policy Task Force. This marks the “initiation” of the required rulemaking; an actual proposal will be an agenda item for the future. Staff is also working on the State Goal for local wellness policies.
Comparison of Nutrition Standards: Part 305.15 and the Task Force’s Recommended Nutrition Standards

Part 305.15 of the School Food Service Rules requires ISBE to initiate in January, 2007 a revision to the food and beverage standards that responds to the statewide nutrition standards recommended by the Illinois School Wellness Policy Task Force.

There are differences between the Task Force’s report and the current School Food Service Rules Part 305.15. The Taskforce recommends that:

- all Illinois schools be impacted
- nutrition standards be expanded to food and beverages sold to high school students
- all carbonated beverages be eliminated
- implementation occur no later than first day of school after July 1, 2009

The following chart provides a detailed comparison of:

- SFS Rules Part 305.15 effective on October 17, 2006) and the
- Recommended Statewide Nutrition Standards of the Illinois School Wellness Policy Task Force (bold font~italics)

<table>
<thead>
<tr>
<th>Food/Beverage</th>
<th>Pre-K – Grade 8</th>
<th>Grades 9 – 12</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Pre-K – Grade 5</td>
<td>Grade 6-12</td>
</tr>
<tr>
<td>Water</td>
<td>Non-sweetened, non-carbonated- any serving size</td>
<td>Unsweetened, non-carbonated- any serving size</td>
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<tr>
<td></td>
<td>Flavored – not allowed unless included on the USDA exemption list</td>
<td>Flavored – not to exceed 25 calories per unit</td>
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<tr>
<td>Milk</td>
<td>Flavored or plain whole, reduced fat (2 percent), low fat (1 percent) and nonfat fluid milk that meets the State and local standards for pasteurized fluid milk-any serving size.</td>
<td>Flavored or plain, reduced fat (2 percent), low fat (1 percent) and nonfat fluid milk that meets the State and local standards for pasteurized fluid milk including lactose free or lactose-reduced milk.</td>
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<tr>
<td></td>
<td>Not to exceed 8 oz. per unit.</td>
<td>Not to exceed 16 oz. per unit.</td>
</tr>
<tr>
<td></td>
<td>Recommend schools move toward offering lowfat (1 percent) and nonfat milk (0 percent)</td>
<td>Recommend schools move toward offering lowfat (1 percent) and nonfat milk (0 percent)</td>
</tr>
<tr>
<td><strong>Dairy Alternative</strong></td>
<td>Reduced fat, and enriched alternative dairy beverages (i.e. rice, soy or other alternative beverages approved by USDA). Any serving size.</td>
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<td>-----------------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
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<tr>
<td><strong>Lactose free or lactose-reduced milk. Rice, soy, or other alternative beverages approved by the USDA.</strong></td>
<td>Lactose free or lactose-reduced milk. Rice, soy, or other alternative beverages approved by the USDA. Not to exceed 8 oz. per unit.</td>
<td></td>
</tr>
<tr>
<td><strong>Smoothie</strong></td>
<td>Yogurt or ice-based, no added sugars, and is made from fresh or frozen fruit drinks that contain at least 50 percent fruit juice. Not to exceed 400 calories. Made with low fat yogurt or other low fat dairy alternatives. Not to exceed 16 oz. per unit.</td>
<td></td>
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<tr>
<td><strong>Fruit and Vegetable drinks</strong></td>
<td>50 percent or more fruit and vegetable juice – Any serving size. 100 percent fruit and vegetable juice Not to exceed 4 oz. per unit. 100 percent fruit and vegetable juice Not to exceed 12 oz. per unit.</td>
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<tr>
<td><strong>All other beverages</strong></td>
<td>Any beverage exempted from the USDA’s list of FMNV. Not Allowed. Noncarbonated beverages and any beverage exempted from the USDA’s list of FMNV Not to exceed 200 calories and 12 oz.</td>
<td></td>
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<tr>
<td><strong>A la carte entrees</strong></td>
<td>Not Applicable. Not to exceed serving size in the school meals programs for entrees served in the USDA School Lunch or Breakfast Programs. Not to exceed 400 calories per serving for entrees not served as part of the USDA School Lunch or Breakfast Programs. Not to exceed 450 calories per serving for entrees not served as part of the USDA School Lunch or Breakfast Programs.</td>
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<tr>
<td>Nutrient-dense foods</td>
<td>All nuts, seeds, nut butters, eggs, fresh fruits and vegetables, 100 percent dried fruits and vegetables, yogurt and cheese</td>
<td>All nuts, seeds, nut butters, eggs, fresh fruits and vegetables, 100 percent dried fruits and vegetables, yogurt and cheese</td>
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<td></td>
<td>Any serving size</td>
<td>Any serving size</td>
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<tr>
<td></td>
<td>Recommend offering part-skim or reduced fat cheese and low fat or nonfat yogurt</td>
<td>Recommend offering part-skim or reduced fat cheese and low fat or nonfat yogurt</td>
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<tr>
<td>Any food item that meets the following criteria</td>
<td>Total calories from fat do not exceed 35 percent</td>
<td>35 percent or less fat calories per serving OR 8 grams or less fat per serving</td>
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<td></td>
<td>Total calories from saturated fat do not exceed 10 percent</td>
<td>10 percent or less saturated fat calories per serving</td>
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<tr>
<td></td>
<td>Total amount of sugar by weight does not exceed 35 percent; and</td>
<td>Not to exceed 200 calories per serving</td>
</tr>
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<td></td>
<td>Calories do not exceed 200</td>
<td></td>
</tr>
<tr>
<td>Any other individual food sales except those listed separately in this table</td>
<td>Not allowed</td>
<td></td>
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