

APPENDIX I01. PUBLIC COMMENTS



February 20, 2024

Secretary Tom Vilsack
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington, D.C. 20250

Ashley Chaifetz
Food and Nutrition Service
P.O. Box 9233
Reston, VA 20195

Re: Document 2023-27763, Proposed Rule: Agency Information Collection Activities: 2024-2025 National School Foods Study

Submitted online at <https://www.regulations.gov>
Emailed to Ashley.Chaifetz@usda.gov

Dear Secretary Vilsack and Senior Analyst Chaifetz,

Balanced commends the U.S. Department of Agriculture (USDA) Food and Nutrition Service for its efforts to gain holistic insights into our nation's school food in the coming school year, particularly as diet-related diseases among children and adolescents continue to rise. We specifically want to draw your attention to **the opportunity to gather more data on plant-based and plant-forward school meal offerings as part of the 2024-2025 National School Foods Study**. Doing so would meet a Congressional directive while also advancing USDA's core values and priorities.

I. Introduction to Balanced and our School Nutrition Advocacy

Balanced is a 501(c)(3) nonprofit organization dedicated to enhancing nutrition security by leveraging the food environments in critical community institutions like schools and hospitals. Each of our programs primarily centers on school meals, which are foundational to the health of the tens of millions of children who rely on them every year.

As outlined in multiple iterations of the Dietary Guidelines for Americans, children and adolescents significantly lack adequate amounts of minimally processed plant-based foods—such as legumes, whole grains, and fruits and vegetables—in their diets. According to NHANES

data from 2017 to March 2020 provided by the USDA Agricultural Research Service website¹, more than 97% of children ages 4 to 18 may not consume adequate fiber in their diets. This reality aggravates the epidemic of diet-related diseases among American youth.

This is why, in our school nutrition work, Balanced collaborates with school nutrition operators to diversify the entrees they offer with plant-based proteins and other plant foods. We consult with school meals administrators on best practices, help problem-solve around logistical constraints, and provide a plethora of free resources, including:

- A comprehensive guide to plant-based food service in schools
- A compilation of plant-based recipes compliant with child nutrition standards
- A searchable database of plant-based products featuring child nutrition-compliant items and vendor contact information.

Balanced also partner with students, parents, and teachers who seek our counsel and support in advocating for more plant-forward and plant-based foods in their districts' school meals programs.

In addition to working directly with these stakeholders, we engage state and federal policymakers on legislative and regulatory efforts impacting school meals standards. Much of this work is done in partnership with likeminded organizations as a member to several coalitions of nonprofits. We also perform novel research and analysis on school meals and produced the 2022 white paper *Closing the Fiber Gap in School Meals*, available at balanced.org/resources.

II. Opportunities for the 2024-2025 National School Foods Study to Meet Congressional Directive and Advance USDAUSDA Core Values and Priorities

USDA's National School Foods Studies are indispensable resources for advocacy organizations like Balanced. We greatly appreciate the advanced planning being done by USDA, including through gathering stakeholder input. While we acknowledge that the study is not a survey of all School Food Authorities (SFAs) and thus the data is not fully representative, as you are aware, it is an important snapshot of our nation's school food that informs programming both at USDA and also at organizations like Balanced.

This is why we strongly believe **the 2024-2025 National School Foods Study should gather more data on plant-based and plant-forward school meal offerings, and that doing so will meet a Congressional directive while also advancing USDA's core values and priorities.**

- *Meet Congressional directive to USDA:* Congress, in its Fiscal Year 2023 agriculture appropriations bill, included the following directive for USDA's Food and Nutrition Service (FNS) to conduct research on and provide guidance for plant-based and alternative protein meal options:

¹ Agricultural Research Service. Usual nutrient intakes from food and beverages, by gender and age. What We Eat in America, NHANES 2017-March 2020 Prepandemic. Accessed online at: https://www.ars.usda.gov/ARUserFiles/80400530/pdf/usual/Usual_Intake_gender_WWEIA_2017_March%202020.pdf

“Alternate Protein Meal Options.--The Committee directs FNS to collect, analyze, and publish research relating to the availability of plant-based and alternate protein meal options under USDA programs in schools and other congregate settings, and the impact of plant-based and alternate protein meal options on population health outcomes. The committee further directs the Department to provide guidance on the implementation of daily plant-based and alternate protein meal options under the NSLP and SBP for consideration by state agencies and local program operators.”

Seven Members of Congress led by Representative Nydia Velázquez have also urged USDA to follow through on this directive. Thus, we want to flag the opportunity to incorporate more plant-based and plant-forward questions in the 2024-2025 National School Foods Study.

Not only will doing so meet an outstanding Congressional directive, but it will provide important information for future school food operations and menuing to best meet student demand and advance USDA’s values and priorities of racial justice, equity, and opportunity.

- *Meet student demand and increase participation:* As the K-12 student population grows increasingly racially and culturally diverse—as well as environmentally conscious and concerned for animal welfare—the demand for plant-based and plant-forward meals have grown. While food service management companies and advocacy organizations have conducted their own polls and studies to understand this demand and the extent to which it is being met, it is necessary for USDA as the implementing agency to more fully evaluate the existing landscape and the gaps. The 2024-2025 School Foods Study is an important venue through which to do so.
- *Advance racial justice, equity, and opportunity:* There are a variety of cultural, ethnic, religious, health, and physiological reasons that make facilitating and encouraging plant-based foods an equity imperative. For example, many religions encourage vegetarianism, and some restrict certain animal products. There is also an important racial justice and equity case for ensuring the availability of plant-based foods: Black, Indigenous, and other People of Color (BIPOC) are three times as likely to follow a plant-based diet than white people, and a 2020 Gallup poll revealed that 31 percent of BIPOC Americans reported reducing meat consumption in the prior year compared to 19 percent of white Americans. According to the National Institutes of Health, 95 percent of Asian Americans, 60-80 percent of African Americans, 80-100 percent of American Indians, and 50-80 percent of Hispanic people are unable to effectively digest lactose. Especially because BIPOC are also more likely to be food insecure—and therefore reliant on free and reduced-price school meals—it is imperative that our child nutrition programs accommodate the dietary needs and preferences of BIPOC students. A necessary step in doing so is utilizing the 2024-2025 School Foods Study to determine the need for improvements in plant-based school foods and plant-forward meal offerings to align with students’ needs.

In an effort to best support USDA in pursuing this opportunity, Balanced offers the following specific topics for inclusion in the 2024-2025 School Foods Study:

- Assess whether and how often plant-based foods aside from nut-butter sandwiches are being offered (e.g., daily, weekly, monthly, or never) in NSLP and SBP.
- Assess school district, parent, and student demand for plant-based and plant-forward meal options, including which kinds of plant proteins are most in demand, in order to inform which commodities are made available through the USDA Foods Program (e.g., veggie burgers, soy nuggets, lentils, tofu, etc.).
- Assess the prevalence of processed and red meats in NSLP and SBP.
- Assess the nutritional profile of plant-based entrees compared to that of animal-based entrees. We are particularly interested in the fiber, sodium, protein, fat (saturated and unsaturated), and added sugar content.

Last, in preparing to include these topics in the next School Foods Study, we encourage USDA to include definitions and explanations of “plant-based” and “plant-forward” to mitigate confusion and ensure accurate data.

- “Plant-based foods” or “plant-based meals” mean foods or meals that contain no animal products and that meet the meat/meat alternate (M/MA) protein component of the child nutrition program (CNP) meal pattern. We are not referring broadly to all fruits and vegetables. These options could also be called “vegan.”
- “Plant-forward” meals refers to meals or entrees for which plant-based proteins are featured but that still contain some animal products.

In closing, Balanced is ready to provide any additional information as valuable to the Agency. Thank you in advance for considering these comments and for pursuing the opportunities herein for our nation’s students and towards USDA’s core values and priorities.

Sincerely,

Audrey Lawson-Sanchez
Executive Director, Balanced

Madeline Bennett, MS
Nutrition Policy Analyst, Balanced

February 13, 2024

Secretary Tom Vilsack
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250

Ashley Chaifetz
Food and Nutrition Service
P.O. Box 9233
Reston, VA 20195

Re: Proposed Rule: Agency Information Collection Activities: 2024-2025 National School Foods Study

Submitted online at Regulations.gov; emailed to Ashley.Chaifetz@usda.gov.

Dear Secretary Vilsack and Senior Analyst Chaifetz,

I am writing on behalf of the Center for Biological Diversity and our nearly 2 million members and supporters. The Center for Biological Diversity is a 501(c)(3) non-profit conservation organization with a staff of scientists, legislative and legal experts tackling climate change and biodiversity loss, including effective mitigation strategies via food and agriculture systems.

Data from National Foods Studies are significant to our work, and we appreciate the opportunity to comment and for the USDA's advanced assessment and invitation for feedback from stakeholders. Our efforts to build climate-friendly school food programs aim to shift the seven billion school meals served each year toward healthy, just, and sustainable meals. We have successfully advocated for such policies and improved funding to expand plant-forward meal offerings and work with a national coalition to expand healthy, climate-friendly K-12 menus. We are currently developing a policy brief on the obstacles and opportunities to advancing more sustainable school food via USDA programs.

We also thank the U.S. Department of Agriculture (USDA) Food and Nutrition Service for its efforts to learn about the reality of U.S. school food, especially due to the enormous impact of school food on our children's health and the health of the planet. This is an important opportunity for the 2024-2025 National School Foods Study to better understand opportunities and obstacles for climate-friendly school food and the correlation of this effort with ensuring more plant-based school meals are available.

I. Opportunities for the 2024-2025 National School Foods Study to Meet Congressional Directives and Advance USDA Core Values and Priorities

The 2024-2025 National School Foods Study is an important opportunity to collect data on plant-based and plant-forward school meal potential, in a way that will improve meal patterns in terms of health and sustainability, advance the USDA's core priorities and meet a Congressional directive.

Plant-based foods specifically meet the meat/meat alternate (M/MA) protein standard of the Child Nutrition Program (CNP) and contain no animal products. A secondary step is plant-forward foods, which are meals with plant-based protein components but still contain some animal products.

a) Include more plant-based and plant-forward questions in the 2024-2025 National Foods Study to meet Congressional Directive to the USDA.

In the 2023 agricultural appropriations bill, Congress directed the Food and Nutrition Service to research and issue guidance on plant-based and alternative protein options.

“Alternate Protein Meal Options. -- The Committee directs FNS to collect, analyze, and publish research relating to the availability of plant-based and alternate protein meal options under USDA programs in schools and other congregate settings, and the impact of plant-based and alternate protein meal options on population health outcomes. The committee further directs the Department to provide guidance on the implementation of daily plant-based and alternate protein meal options under the NSLP and SBP for consideration by state agencies and local program operators.”

Seven Members of Congress, led by Representative Nydia Velázquez have also urged the USDA to follow through on this directive. The Center for Biological Diversity and members of national school food coalitions are ready to support the USDA in doing so.

b) Assessing plant-based and plant-forward information will provide vital data for future efforts to meet student demand and advance USDA’s priorities of racial justice, equity, and opportunity.

The increasing demand¹ for more plant-based² and plant-forward³ school meals reflect a diverse and environmentally conscious⁴ student population at schools across the nation.⁵ Plant-based and plant-forward school menus, meals and entrées are requested for health, environmental, cultural, ethnic, personal, and religious reasons. For example, some religions restrict all or some animal products and plant-based menus more easily accommodate this issue for schools and diverse student populations.

Black, Indigenous, and people of color are 3 times more likely to follow a plant-based diet.⁶ Black communities are the fastest growing demographic eating plant-based diets. According to the National Institutes of Health, lactose intolerance is a question of health, racial justice, and equity that necessitate making plant-based school foods more widely and easily available: 95% of Asian Americans, 60%-80% of African Americans, 80%-100% of Native Americans, and 50%-80% of Latino-Americans can’t effectively digest lactose.⁷ Marginalized Americans are also more likely to be food insecure,⁸ where

¹ Plant Based Food Market Outlook (2023-2033). Future Market Insights. <https://www.futuremarketinsights.com/reports/plant-based-food-market>.

² Singh, S. Plant-Based Food Market Size, Trends, Share, and Forecast to 2030. Market Research Future <https://www.marketresearchfuture.com/reports/plant-based-food-market-8578> ; and Fera, L. (2022, September 27). Gen Z is leading a generational shift in plant-based food purchasing. Supermarket News. <https://www.supermarketnews.com/health-wellness/gen-z-leading-generational-shift-plant-based-food-purchasing>.

³ Cobe, P. & 2022. (n.d.). The rise in plant-forward eating continues post-pandemic. Restaurant Business <https://www.restaurantbusinessonline.com/consumer-trends/rise-plant-forward-eating-continues-post-pandemic> ; and Jed, E. (2018, August 12). Aramark Brings Gen Z Food Trends to Life on College Campuses Nationwide. Vending Times.com <https://www.vendingtimes.com/news/aramark-brings-gen-z-food-trends-to-life-on-college-campuses-nationwide/>.

⁴ California Leads the Way with Low-Carbon School Food. (2023). Civil Eats. <https://civileats.com/2023/09/19/california-leads-the-way-in-low-carbon-school-meals/>.

⁵ Plant Based Meal Options in CNP. (2023). California Department of Education. <https://www.cde.ca.gov/ls/nu/he/vegmealoptionscnp.asp>.

⁶ Gallup. (2019, September 27). What Percentage of Americans Are Vegetarian? <https://news.gallup.com/poll/510038/identify-vegetarian-vegan.aspx>.

⁷ National Institutes of Health, Lactose Intolerance: Information for Health Care Providers (2006). https://webarchive.library.unt.edu/eot2008/20090113185727/http://www.nichd.nih.gov/publications/pubs/upload/NICHD_MM_Lactose_FS.pdf.

⁸ Myers, A. M. C., & Painter, M. A. (2017). Food insecurity in the United States of America: an examination of race/ethnicity and nativity. Food Security, 9(6), 1419–1432. https://ideas.repec.org/a/spr/ssefpa/v9y2017i6d10.1007_s12571-017-0733-8.html.

children depend on a healthy, culturally appropriate, and environmentally sustainable school meal as the primary source of their daily nutrition.

It is imperative for the USDA to better evaluate the existing landscape of plant-based school meals and the gaps and opportunities that exist, while strengthening and guiding the efforts of food service management companies and advocacy organizations, to ensure our school food programs meet the needs of diverse student populations.

II. Recommendations

To meet the above goals and USDA priorities, as well as the Congressional Directive, we recommend that the 2024-2025 National Foods Study assesses the following data points:

- The offerings of plant-based foods (not including nut-butter sandwiches) and how frequently or infrequently (daily, weekly, monthly, or never) in the National School Lunch Program and School Breakfast Program.
- The demand for plant-based and plant-forward meal options, including the types of plant proteins, to better inform which commodities are available through the USDA Foods Program (e.g. veggie burgers, soy nuggets, lentils, tofu, etc.).
- The prevalence of processed and red meat in the National School Lunch Program and School Breakfast Program.
- The nutritional characteristics of plant-based entrees compared to animal-based entrees.
- The best way to ensure accurate data and reduce confusion by defining and explaining the terms *plant-based* and *plant-forward*, and how children are presented with these options.

The Center for Biological Diversity can assist in these efforts and provide resources as needed. Thank you in advance for your consideration of these opportunities for our nation's students.

Sincerely,

Jennifer Molidor

Senior Food Campaigner
Center for Biological Diversity
BiologicalDiversity.org



Chloë Waterman
Sr. Program Manager, Climate-Friendly Food Campaign
Friends of the Earth
1101 15th St NW, Washington DC 20005

January 30, 2024

Secretary Tom Vilsack
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Washington, DC 20250

Ashley Chaifetz
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P.O. Box 9233
Reston, VA 20195

Re: Document 2023-27763, Proposed Rule: Agency Information Collection Activities: 2024-2025 National School Foods Study

Submitted online at <https://www.regulations.gov>
Emailed to Ashley.Chaifetz@usda.gov

Dear Secretary Vilsack and Senior Analyst Chaifetz,

On behalf of Friends of the Earth U.S. and our more than 4.5 million members and supporters, we commend the U.S. Department of Agriculture (USDA) Food and Nutrition Service for its efforts to gain holistic insights about our nation's school food in the coming school year given the vital role food and nutrition plays in our health, wellbeing, and environment. Specifically, we want to draw your attention to the fact that **there is a vital opportunity for the 2024-2025 National School Foods Study to gather more data on plant-based¹ school food and plant-forward² school meal offerings, and that doing so will meet a Congressional directive while also advancing USDA's core values and priorities.**

I. Introducing Friends of the Earth and the Climate-Friendly School Food Program

Founded in 1969 by David Brower, Friends of the Earth U.S. is a 501(c)(3) non-profit organization with offices in Berkeley, California and Washington, D.C., and staff located across the country. Friends of the Earth is an environmental and social justice organization consisting of more than 4.5 million members and activists in all 50 states, the District of Columbia, Puerto Rico, Guam, and other U.S. territories. Friends of the Earth is a member of Friends of the Earth-International, which is a network of grassroots groups in 74 countries worldwide. Our mission is to protect our natural environment – including air,

¹ We use “plant-based foods” or “plant-based meals” to mean foods or meals that contain no animal products *and* that meet the [meat/meat alternate \(M/MA\)](#) protein component of the child nutrition program (CNP) meal pattern. We are *not* referring broadly to all fruits and vegetables. These options could also be called “vegan.”

² We use “plant-forward” to mean meals or entrees for which plant-based proteins are featured but that still contain some animal products.

water, and land – to create a healthier and more just world. We utilize public education, research, advocacy, legislative and administrative processes, litigation, and open access to government processes and records to achieve our organizational goals.

For more than seven years, Friends of the Earth’s Climate-Friendly School Food Program has worked to leverage the seven billion school meals served each year to spur a more healthy, just, and sustainable food system from farm to fork. We have successfully advocated for policies and funding to expand plant-forward meal offerings in California and Washington, D.C.; facilitated a national coalition of more than a dozen non-profit organizations working to expand healthy, climate-friendly K-12 menus; hosted regional forums for school food stakeholders on climate-friendly school food strategies; and co-led a policy program for youth to engage in school food advocacy. We have authored several reports and policy briefs, including:

- [Shrinking the Carbon and Water Footprint of School Food](#) (2017), which documents carbon, water, and cost savings at Oakland Unified School District from shifting to more plant-forward menus.
- [Scaling Up Healthy, Climate-Friendly School Food](#) (2019), which documents strategies for incorporating plant-based and plant-forward dishes into K-12 schools and features case studies from four pioneering school districts.
- [The State of School Lunch in California](#) (2021), which analyzed California lunch menus to find that meat and dairy products dominated K-12 menus, with few plant-based options available in most districts.
- [Organic School Food Roadmap](#) (2021), which outlines strategies for increasing organic options in K-12 menus and features seven school district case studies.
- [Measuring and Modeling Climate, Environmental, and Social Impacts of Federal Food Procurement](#)³ (2023), which analyzes two years of publicly available food purchasing data, includes the first-ever carbon footprinting of federal food spending models how changes could affect various social and environmental outcomes.
- [Plant-Based Trends in California’s School Lunches](#) (2023), which found remarkable improvements in the frequency, quality and variety of plant-based entrées featured during the Covid pandemic but also an increase in the number of entrées with processed meat and that many schools rarely or never have plant-based options available, leaving some students without options.

Our California Climate-Friendly School Food Program helps school districts make the shift towards nourishing, delicious, plant-forward, and organic menus. We provide technical assistance to support organic procurement and plant-forward menus, marketing materials, student and community engagement, and resources to help school districts succeed. We currently work with 85 school districts in California on customized menu development, partnering directly with nutrition service directors to provide technical assistance for nourishing, climate-friendly menu development shifts. Our technical support reaches 18 of the top 25 largest school districts in California and focuses on recipe development, culinary training, student engagement, and marketing strategies for climate-friendly, plant-based, and organic menu offerings.

³ Collaboratively developed with the Federal Good Food Purchasing Coalition.

In alignment with and in service of our mission, vision, and core values, **enclosed are Friends of the Earth’s comments on the USDA Food and Nutrition Service (FNS) Proposed Rule: Agency Information Collection Activities: 2024-2025 National School Foods Study, published in the Federal Register on December 19, 2023 under document number 2023-27763** (the document citation is 88 FR 87736).

II. Opportunities for the 2024-2025 National School Foods Study to Meet Congressional Directive and Advance USDA Core Values and Priorities

Friends of the Earth’s Climate-Friendly School Food Program uses data from past National School Foods Studies with great frequency. We are eager for the 2024-2025 study, and we are appreciative of the advanced planning being done by USDA, including through gathering stakeholder input. While we acknowledge that the study is not a survey of all School Food Authorities (SFAs) and thus the data is not fully representative, as you are aware, it is an important snapshot of our nation’s school food that informs programming both at USDA and also at organizations such as ours.

Specifically, we want to draw your attention to the fact that **there is a vital opportunity for the 2024-2025 National School Foods Study to gather more data on plant-based⁴ school food and plant-forward⁵ school meal offerings, and that doing so will meet a Congressional directive while also advancing USDA’s core values and priorities.**

→ **Meet Congressional directive to USDA.** For context, Congress, in its [Fiscal Year 2023 agriculture appropriations bill](#), included the following directive for USDA’s Food and Nutrition Service (FNS) to conduct research on and provide guidance for plant-based and alternative protein meal options:

“Alternate Protein Meal Options.--The Committee directs FNS to collect, analyze, and publish research relating to the availability of plant-based and alternate protein meal options under USDA programs in schools and other congregate settings, and the impact of plant-based and alternate protein meal options on population health outcomes. The committee further directs the Department to provide guidance on the implementation of daily plant-based and alternate protein meal options under the NSLP and SBP for consideration by state agencies and local program operators.”

Since last year, we have been in ongoing conversations with USDA about meeting this directive and are eager to support the Agency in doing so, and seven Members of Congress led by Representative Nydia Velázquez have also [urged USDA](#) to follow through on this directive. Thus, we want to flag the opportunity to incorporate more plant-based and plant-forward questions in the 2024-2025 National School Foods Study.

⁴ We use “plant-based foods” or “plant-based meals” to mean foods or meals that contain no animal products *and* that meet the [meat/meat alternate \(M/MA\)](#) protein component of the child nutrition program (CNP) meal pattern. We are *not* referring broadly to all fruits and vegetables. These options could also be called “vegan.”

⁵ We use “plant-forward” to mean meals or entrees for which plant-based proteins are featured but that still contain some animal products.

Not only will doing so meet an outstanding Congressional directive but it will provide important information for future school food operations and menuing to best meet student demand and advance USDA's values and priorities of racial justice, equity, and opportunity.

- **Meet student demand and increase participation:** As the K-12 student population grows increasingly racially and culturally diverse as well as environmentally conscious and concerned for animal welfare, the demand for plant-based^{6 7} and plant-forward^{8 9} meals have grown. While food service management companies¹⁰ and advocacy organizations¹¹ have conducted their own polls and studies to understand this demand and the extent to which it is being met, it is necessary for USDA as the implementing agency to more fully evaluate the existing landscape and the gaps. The 2024-2025 School Foods Study is an important venue through which to do so.

- **Advance racial justice, equity, and opportunity:** There are a variety of cultural, ethnic, religious, health, and physiological reasons¹² that make facilitating and encouraging plant-based foods an equity imperative. For example, many religions encourage vegetarianism, and some restrict certain animal products. There is also an important racial justice and equity case for ensuring the availability of plant-based foods: Black, Indigenous, and other People of Color (BIPOC) are three times as likely to follow a plant-based diet than white people,¹³ and a 2020 Gallup poll revealed that 31 percent of BIPOC Americans reported reducing meat consumption in the prior year compared to 19 percent of white Americans.¹⁴ According to the National Institutes of Health, 95 percent of Asian Americans, 60-80 percent of African Americans, 80-100 percent of American Indians, and 50-80 percent of Hispanic people are unable to effectively digest lactose.¹⁵ Especially because BIPOC are also more likely to be food insecure¹⁶ – and therefore reliant on free and reduced-price school meals – it is imperative that our child nutrition programs accommodate the dietary needs and preferences of BIPOC students. A necessary step in doing so is utilizing the 2024-2025 School Foods Study to ascertain the need for improvements in plant-based school foods and plant-forward meal offerings to align with students' needs.

In an effort to best support USDA in pursuing this opportunity, Friends of the Earth offers the following specific topics for inclusion in the 2024-2025 School Foods Study:

⁶ Singh, S. [Plant-Based Food Market Size, Trends, Share, and Forecast to 2030](#).

⁷ Feria, L. (2022, September 27). [Gen Z is leading a generational shift in plant-based food purchasing](#). Supermarket News.

⁸ Cobe, P. & 2022. (n.d.). [The rise in plant-forward eating continues post-pandemic](#). Restaurant Business.

⁹ Jed, E. (2018, August 12). [Aramark Brings Gen Z Food Trends To Life On College Campuses Nationwide](#).

¹⁰ i.e., [8 Veg Out treats from Chartwells K12](#) | Food Management. (2022, November 8).

¹¹ i.e., aforementioned Friends of the Earth reports.

¹² Americans' environmental and animal welfare concerns are additional reasons for USDA to facilitate plant-based foods.

¹³ Gallup. (2019, September 27). [What Percentage of Americans Are Vegetarian?](#)

¹⁴ Gallup. (2020, January 27). [Nearly One in Four in U.S. Have Cut Back on Eating Meat](#).

¹⁵ National Institutes of Health, Lactose Intolerance: Information for Health Care Providers (2006).

¹⁶ Myers, A. M. C., & Painter, M. A. (2017). [Food insecurity in the United States of America: an examination of race/ethnicity and nativity](#). Food Security, 9(6), 1419–1432.

- Assess whether and how often plant-based foods *aside from* nut-butter sandwiches are being offered (e.g. daily, weekly, monthly, or never) in NSLP and SBP.¹⁷
- Assess school district, parent, and student demand for plant-based and plant-forward meal options, including which kinds of plant proteins are most in demand, in order to inform which commodities are made available through the USDA Foods Program (e.g. veggie burgers, soy nuggets, lentils, tofu, etc.).
- Assess the prevalence of processed and red meat in NSLP and SBP.
- Assess the nutritional characteristics of plant-based entrees compared to animal-based entrees.

Last, in preparing to include these topics in the next School Foods Study, we encourage USDA to include definitions and explanations of “plant-based” and “plant-forward” to mitigate confusion and ensure accurate data.

- “Plant-based foods” or “plant-based meals” mean foods or meals that contain no animal products *and* that meet the [meat/meat alternate \(M/MA\)](#) protein component of the child nutrition program (CNP) meal pattern. We are *not* referring broadly to all fruits and vegetables. These options could also be called “vegan.”
- “Plant-forward” meals mean meals or entrees for which plant-based proteins are featured but that still contain some animal products.

In closing, Friends of the Earth is ready to provide any additional information as valuable to the Agency. Thank you in advance for your consideration of these comments and for pursuing the opportunities herein for our nation’s students and towards USDA’s core values and priorities.

With gratitude and in partnership,

Chloë Waterman

Chloë Waterman
Senior Program Manager, Climate-Friendly Food Program
Friends of the Earth

¹⁷ A 2021 Friends of the Earth analysis of California school lunch menus found that only four percent of entree options were plant-based (and half of those were nut butter and jelly) in contrast to 94 percent of entree options that featured animal-sourced proteins. Reference: 31 Hamerschlag, K. and Kraus-Polk, J. Friends of the Earth. The State of School Lunch in California. March 2021, p. 6. https://foe.org/wp-content/uploads/2021/03/SchoolFoodReport_No-Execsummary.pdf

From: [Susan Rau](#)
To: [Chaifetz, Ashley - FNS](#)
Subject: [External Email]School Foods
Date: Sunday, February 18, 2024 8:44:17 AM

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Hello,

School foods used to be much healthier and less processed. My mom worked in a small public school cafeteria where they made all their baked goods and soups, etc from scratch thru the use of the surplus food program.

My son went to school in the 1990's and 2000's. His food was processed, reheated fried food and when I went to eat lunch with him, the deli meats were greenly iridescent. The items offered were extremely processed and unhealthy.

I worked as an aide after that and salads were added, but everything else is highly processed, brought in, prefried and reheatable unhealthy items.

Now, the situation is similar. School districts can't afford healthy options. It is time for healthy regular meals are served and are joined by healthy vegetarian and healthy vegan options. Breakfast is the worst with prepackaged high calorie highly processed items. Food dyes, preservatives and high amounts of sugar are in almost everything. It is time for USDA to follow their own good food guidelines and start providing schools with healthy reasonably priced options.

School districts need additional funds to be able to afford to feed their students healthy meals. Children are our future and it is a crime to see what they are given for lunch.

Sincerely,

Sue Rau
315 323 0850
Norfolk, NY

From: [Erin Thompson](#)
To: [Chaifetz, Ashley - FNS](#)
Subject: [External Email]Plant based options
Date: Sunday, February 18, 2024 9:44:35 PM

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Dear Ashley,

My name is Erin Thompson and I am a parent of a school aged child. I am also a nurse who deeply cares about nutrition and health.

I commend the USDA Food and Nutrition Service for considering the opportunity to incorporate more plant-based questions. I feel strongly that plant based diets are the healthiest for us all.

I encourage the USDA to build a deeper understanding of what plant-based options are currently being offered (other than nut-butter sandwiches!), which kinds of plant-based options are most in demand and the nutrient content of plant-based options. This will help meet an outstanding Congressional directive to the USDA's Food and Nutrition Service.

There is an important racial justice and equity case for ensuring the availability of plant-based school foods given that (1) BIPOC students are more likely to be unable to digest lactose, (2) BIPOC families are more likely to follow a plant-based diet than whites and (3) BIPOC families are also more likely to be food insecure and therefore reliant on free and reduced-price school food programs.

I strongly encourage the USDA to consider the mounting evidence in favor of offering more plant-based options on K-12 menus, including student health benefits, lower carbon and water footprints, environmental and climate benefits. There are many NGOs to partner with who have expertise in plant-based school nutrition such as The Coalition for Healthy School Food and The Physicians Committee For Responsible Medicine.

Thank you,

Erin Thompson



Submitted via Regulations.gov

**RE: OMB Number 0584-NEW: Agency Information Collection Activities: 2024-2025
National School Foods Study**

February 20, 2024

To Whom It May Concern:

The International Dairy Foods Association (IDFA), Washington, D.C., represents the nation's dairy manufacturing and marketing industry, which supports more than 3.2 million jobs that generate \$49 billion in direct wages and \$794 billion in overall economic impact. IDFA's diverse membership ranges from multinational organizations to single-plant companies, from dairy companies and cooperatives to food retailers and suppliers, all on the forefront of innovation and sustainable business practices. Together, they represent most of the milk, cheese, ice cream, yogurt and cultured products, and dairy ingredients produced and marketed in the United States and sold throughout the world. Delicious, safe, and nutritious, dairy foods offer unparalleled health and consumer benefits to people of all ages.

IDFA appreciates the opportunity to provide input on the proposed 2024-2025 National School Foods Study. This research is important to collect vital information that can be used to inform program administration and meal patterns to best meet the needs of students and school food authorities (SFA).

The proposed collection of information is necessary.

We agree that conducting this study is necessary to understand the implementation and use of the school meal programs, including the National School Lunch Program (NSLP) and the School Breakfast Program (SBP). Collecting this information in 2024-2025 will be of critical importance due to changes in these programs since the last School Nutrition and Meal Cost Study conducted in 2014-2015. Updates to the nutrition standards for these programs following the 2022 final rule and program changes made during the COVID-19 pandemic resulted in impacts that should be captured in the 2024-2025 study. This new study will provide important information in advance of further changes to the nutrition standards, as proposed in February 2023. The information from this study will also ensure that the nutrition of school meals is not negatively impacted through unintended consequences that may inadvertently reduce students' consumption of nutrient rich, yet under consumed, foods like dairy.

Dairy foods, such as cheese, cow's milk, yogurt and other nutrient-rich foods that are key components of school meals and recommended for increased consumption by the Dietary Guidelines for Americans (DGA), should be specifically examined to understand how often these options are chosen by students, and the actual consumption and waste of these foods. This will ensure that the Agency and schools can identify targeted strategies to increase selection and consumption of these nutrient dense foods by students to help them align their diets with the recommendations of the DGA.

Additional information would enhance the quality, utility and clarity of the data collected.

For the study to have practical utility, it will be important to understand what specific dairy foods are included in school meals and to collect data on the selection and consumption of these foods by students. Details about these foods, such as flavored or unflavored milk, milkfat content and other differentiating aspects of these products, including whether they are lactose free, should be collected.

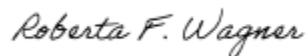
In addition, any data that is related to cost-containment measures, including container sizes or forms of these foods, should be collected and considered. Specifically, as costs of foods and beverages are collected, additional indirect costs such as refrigeration and storage requirements should be identified and considered in addition to the actual monetary cost of the food. This will help to identify potential cost savings and food buying efficiencies that can assist SFAs to provide nutritious meals at a reasonable cost.

Importantly, the information collected from SFA staff and other appropriate respondents should address challenges and possible solutions in the procurement process for the school meal programs. While there are many complexities to school food procurement, past experience from the SFA respondents may identify best practices in procurement and bidding. Potential approaches could include broadening acceptable flavors, soliciting bids from additional potential suppliers, or better aligning bids for similar products, e.g., grouping milk with similar fat levels together rather than grouping milk at all the various fat levels together.

Conclusion

IDFA takes great pride in offering dairy products that provide essential nutrition to students participating in NSLP and SBP. IDFA supports the proposed collection of data to ensure that these programs meet the needs of students, their families and school food authorities. We look forward to reviewing the new information and data from this study and determining how it can best be used to increase school meal participation and consumption of nutrient-rich options, particularly for under consumed food groups, like dairy.

Sincerely,



Roberta Wagner
Senior Vice President,
Regulatory and Scientific Affairs



February 13, 2024

Ms. Ashley Chaifetz
Food and Nutrition Service
U.S. Department of Agriculture
1320 Braddock Pl., 5th Floor
Alexandria, VA 22314

Re: Agency Information Collection Activities: 2024-2025 National School Foods Study

Dear Ms. Chaifetz:

These comments are provided in response to the Food and Nutrition Service's (FNS) notice of information collection for the 2024-2025 National School Foods Study (NSFS).

National Dairy Council (NDC), the non-profit organization founded by U.S. dairy farmers, is committed to nutrition research and education about dairy's role in healthy eating patterns in support of health and wellness. Established in 1915, NDC comprises a staff of registered dietitians and experts in nutrition and environmental research, product development, food safety and communications. NDC provides science-based dairy nutrition information to, and in collaboration with, a variety of stakeholders committed to fostering a healthier nation, including health professionals, educators, school nutrition specialists, academia and industry. As a checkoff organization, NDC does not and cannot attempt to influence policy.

The predecessors to this study, including the School Nutrition and Meal Cost Study (SNMCS) and School Food Purchase Study (SFPS), have proven to be important and comprehensive sources of data on school nutrition programs. Information from such studies informs the school nutrition community as well as organizations, like NDC, that provide resources to schools to promote better nutrition and overall well-being.

Should the agency wish to achieve even greater transparency in making information available to the public, two points of information relative to milk and other dairy foods would serve this purpose. First, the NSFS could calculate and publish the "take rate" for milk in schools. This is the percentage of students who, under offer versus serve (OVS), take milk with the meal. The information to make this calculation – an indicator of students' consumption of milk and its 13 essential nutrients – was available in the public use files for the SNMCS but was not provided in the published reports. NDC commissioned a study of the public use files and was able to calculate take rates, but the information would be

available to more people if it is included in the actual NSFS report. Take rates may provide important perspectives on whether students like the milk they are being offered and whether consumption patterns are changing over time. Similar take rates could, if FNS desired, be calculated for other menu items that also are under-consumed in the American diet, according to the Dietary Guidelines for Americans, like fruits and vegetables.

Second, if FNS follows prior practice for data collection on individual food costs (previously collected through the SFPS), the agency will obtain information on quantities of both school-purchased and USDA Foods. The share of purchased vs. USDA Foods is of interest to school nutrition professionals for comparing their business practices to those of their peers. It also provides important data to NDC and other organizations that work with schools to enhance consumption of key foods and nutrients recommend by the Dietary Guidelines for Americans. Because quantities of USDA Foods can vary considerably from one year to the next based on market conditions and other factors, it can be challenging to use a single year's data to estimate total quantities of a given food (e.g., cheese) in schools during years between surveys. The quantities of USDA Foods are publicly available each year, but the schools' own purchases generally are not.

Should FNS wish to enhance users' ability to discern trends and quantities of foods in schools over time, the agency could consider adding a qualitative question to the survey. Such a question could be posed for categories rather than individual foods to minimize the burden on respondents.

NDC appreciates the opportunity to submit these comments.

Sincerely,

A handwritten signature in cursive script that reads "Katie Brown".

Katie Brown, EdD, RDN
President
National Dairy Council