

APPENDIX I02. RESPONSE TO PUBLIC COMMENTS



Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

February 22, 2024

Audrey Lawson-Sanchez
Executive Director, Balanced
Madeline Bennett, MS
Nutrition Policy Analyst, Balanced

Re: 2024-2025 National School Foods Study

Dear Ms. Lawson-Sanchez and Ms. Bennett:

Thank you so much for the thoughtful comments you provided in response to the Federal Register notice for the 2024-2025 National School Foods Study (NSFS).

We share your interest in gathering data on plant-based school food and plant-forward school meal offerings in the National School Lunch Program (NSLP) and National School Breakfast Program (SBP). To that end, the NSFS will estimate the prevalence of plant-based offerings in school meals at the school level and will also understand the consumption of plant-based meals and products at the student level, as we conduct dietary recalls as part of this research. We will collect information on all foods procured by a sample of SFAs, for use in both the Child Nutrition Programs as well as non-program foods. While we will ask about nut butter, we include other vegetarian and plant-based entrees at every level of our menu survey; we intend to assess the nutritional characteristics of all items offered and served.

Further, the surveys at the School Food Authority (SFA) director level ask about culturally-diverse meals and their intention to cater to the student population. As you note in your letter, this information will help USDA meet the Congressional directive 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.”

We appreciate your recommendation to better understand the demand of plant-based meals in the NSLP and SBP. The study also includes surveys to collect data from parents and

students on satisfaction with school meals. While we do not specifically ask about preferences for plant-based or alternative meals, the parent and student instruments include open-ended response options that provide the opportunity for respondents to provide information about what they consumed that day. USDA would like to understand all we can about demand for plant-based offerings, as well as many other topics, and we felt this was the most appropriate approach to gather such information without adding substantively to the burden of the study on SFAs, schools, and families.

Thank you again for your input. We truly appreciate the recommendations and support for the study.

Very best,

Ashley Chaifetz
Senior Analyst
Food and Nutrition Service
United States Department of Agriculture



Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

February 22, 2024

Jennifer Molidor
Senior Food Campaigner
Center for Biological Diversity

Re: 2024-2025 National School Foods Study

Dear Ms. Molidor:

Thank you so much for the thoughtful comments you provided in response to the Federal Register notice for the 2024-2025 National School Foods Study (NSFS).

We share your interest in gathering data on plant-based school food and plant-forward school meal offerings in the National School Lunch Program (NSLP) and National School Breakfast Program (SBP). To that end, the NSFS will estimate the prevalence of plant-based offerings in school meals at the school level and will also understand the consumption of plant-based meals and products at the student level, as we conduct dietary recalls as part of this research. We will collect information on all foods procured by a sample of SFAs, for use in both the Child Nutrition Programs as well as non-program foods. While we will ask about nut butter, we include other vegetarian and plant-based entrees at every level of our menu survey; we intend to assess the nutritional characteristics of all items offered and served.

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We appreciate your recommendation to better understand the demand of plant-based meals in the NSLP and SBP. The study also includes surveys to collect data from parents and students on satisfaction with school meals. While we do not specifically ask about

preferences for plant-based or alternative meals, the parent and student instruments include open-ended response options that provide the opportunity for respondents to provide information about what they consumed that day. USDA would like to understand all we can about demand for plant-based offerings, as well as many other topics, and we felt this was the most appropriate approach to gather such information without adding substantively to the burden of the study on SFAs, schools, and families.

Thank you again for your input. We truly appreciate the recommendations and support for the study.

Very best,

Ashley Chaifetz
Senior Analyst
Food and Nutrition Service
United States Department of Agriculture



Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

February 22, 2024

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

Re: 2024-2025 National School Foods Study

Dear Ms. Waterman:

Thank you so much for the thoughtful comments you provided in response to the Federal Register notice for the 2024-2025 National School Foods Study (NSFS).

We share your interest in gathering data on plant-based school food and plant-forward school meal offerings in the National School Lunch Program (NSLP) and National School Breakfast Program (SBP). To that end, the NSFS will estimate the prevalence of plant-based offerings in school meals at the school level and will also understand the consumption of plant-based meals and products at the student level, as we conduct dietary recalls as part of this research. We will collect information on all foods procured by a sample of SFAs, for use in both the Child Nutrition Programs as well as non-program foods. While we will ask about nut butter, we include other vegetarian and plant-based entrees at every level of our menu survey; we intend to assess the nutritional characteristics of all items offered and served.

Further, the surveys at the School Food Authority (SFA) director level ask about culturally-diverse meals and their intention to cater to the student population. As you note in your letter, this information will help USDA meet the Congressional directive 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.”

We appreciate your recommendation to better understand the demand of plant-based meals in the NSLP and SBP. The study also includes surveys to collect data from parents and

students on satisfaction with school meals. While we do not specifically ask about preferences for plant-based or alternative meals, the parent and student instruments include open-ended response options that provide the opportunity for respondents to provide information about what they consumed that day. USDA would like to understand all we can about demand for plant-based offerings, as well as many other topics, and we felt this was the most appropriate approach to gather such information without adding substantively to the burden of the study on SFAs, schools, and families.

Thank you again for your input. We truly appreciate the recommendations and support for the study.

Very best,

Ashley Chaifetz
Senior Analyst
Food and Nutrition Service
United States Department of Agriculture



Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

February 22, 2024

Re: 2024-2025 National School Foods Study

Dear Ms. Rau:

Thank you so much for the thoughtful comments you provided in response to the Federal Register notice for the 2024-2025 National School Foods Study (NSFS).

We share your interest in gathering data on plant-based school food and plant-forward school meal offerings in the National School Lunch Program (NSLP) and National School Breakfast Program (SBP). To that end, the NSFS will estimate the prevalence of plant-based offerings in school meals at the school level and will also understand the consumption of plant-based meals and products at the student level, as we conduct dietary recalls as part of this research. We will collect information on all foods procured by a sample of SFAs, for use in both the Child Nutrition Programs as well as non-program foods.

Further, the surveys at the School Food Authority (SFA) director level ask about culturally-diverse meals and their intention to cater to the student population.

Thank you again for your input. We truly appreciate the recommendations and support for the study.

Very best,

Ashley Chaifetz
Senior Analyst
Food and Nutrition Service
United States Department of Agriculture



February 22, 2024

Re: 2024-2025 National School Foods Study

Dear Ms. Thompson:

Thank you so much for the thoughtful comments you provided in response to the Federal Register notice for the 2024-2025 National School Foods Study (NSFS).

We share your interest in gathering data on plant-based school food and plant-forward school meal offerings in the National School Lunch Program (NSLP) and National School Breakfast Program (SBP). To that end, the NSFS will estimate the prevalence of plant-based offerings in school meals at the school level and will also understand the consumption of plant-based meals and products at the student level, as we conduct dietary recalls as part of this research. We will collect information on all foods procured by a sample of SFAs, for use in both the Child Nutrition Programs as well as non-program foods. While we will ask about nut butter, we include other vegetarian and plant-based entrees at every level of our menu survey; we intend to assess the nutritional characteristics of all items offered and served.

Further, the surveys at the School Food Authority (SFA) director level ask about culturally-diverse meals and their intention to cater to the student population.

Thank you again for your input. We truly appreciate the recommendations and support for the study.

Very best,

Ashley Chaifetz
Senior Analyst
Food and Nutrition Service
United States Department of Agriculture



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U.S. DEPARTMENT OF AGRICULTURE

February 22, 2024

Roberta Wagner
Senior Vice President,
Regulatory and Scientific Affairs
IDFA: International Dairy Foods Association

Re: 2024-2025 National School Foods Study

Dear Ms. Wagner:

Thank you so much for the thoughtful comments you provided in response to the Federal Register notice for the 2024-2025 National School Foods Study (NSFS). We share your interest in gathering data on milk offerings in the National School Lunch Program (NSLP) and National School Breakfast Program (SBP).

The NSFS will estimate the prevalence of varied milk offerings in school meals at the school level and will also understand the consumption of milk and other dairy products at the student level, as we conduct dietary recalls as part of this research. We intend to assess the nutritional characteristics of all items offered and served and, as always, intend to make publicly-available as much data as possible. We also include varied indirect costs as we estimate the cost of a reimbursable meal.

Further, we will collect procurement and price data for school-purchased items and USDA Foods. We will collect data on all foods procured by a sample of SFAs, for use in both the Child Nutrition Programs as well as non-program foods, and this definitively includes milk, cheese, and yogurt in its many containers and types.

Finally, to the extent possible, we will compare these data to the previous School Nutrition and Meal Cost Study and the School Food Purchase Study, to establish a trend over time.

Very best,

Ashley Chaifetz
Senior Analyst

Food and Nutrition Service, Braddock Metro Center, 1320 Braddock Place, Alexandria, VA 22314

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Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

February 22, 2024

Katie Brown, EdD, RDN
President
National Dairy Council

Re: 2024-2025 National School Foods Study

Dear Dr. Brown:

Thank you so much for the thoughtful comments you provided in response to the Federal Register notice for the 2024-2025 National School Foods Study (NSFS). We share your interest in gathering data on milk offerings in the National School Lunch Program (NSLP) and National School Breakfast Program (SBP).

The NSFS will estimate the prevalence of varied milk offerings in school meals at the school level and will also understand the consumption of milk and other dairy products at the student level, as we conduct dietary recalls as part of this research. We intend to assess the nutritional characteristics of all items offered and served and, as always, intend to make publicly-available as much data as possible. We appreciate your suggestion to include take rates for specific foods in the report and will take that into consideration as we plan for dissemination of results from this study.

Further, we will collect procurement and price data for school-purchased items and USDA Foods. We count on participating School Food Authorities to provide this data at the SFA level, as we also only have State level data on USDA Foods provision.

Finally, to the extent possible, we will compare these data to the previous School Nutrition and Meal Cost Study and the School Food Purchase Study, to establish a trend over time.

Very best,

Ashley Chaifetz
Senior Analyst