

May 5, 2022

Ms. Cindy Long
Administrator of USDA Food and Nutrition Service
United States Department of Agriculture

Dear Administrator Long:

On behalf of the undersigned school districts and organizations (and the millions of members we represent), we are writing to request that USDA provide more flexibility to school districts in serving plant-based and plant-forward meal options, in alignment with the Dietary Guidelines for Americans (DGA).ⁱ This will provide school districts with more options to serve nutritious, cost-effective meals as they navigate the pandemic's ongoing impact on supply chains.

School meal programs have encountered a host of challenges these past two years including, food deliveries arriving late or not at all, inflation driving up costs, and staples being hard to procure. With the end of federal waivers that kept meal costs down and allowed flexibilities which made it easier to serve students during the pandemic, school districts are understandably concerned about how they will continue to provide nutritious meals to their students. In order to address some of these concerns while at the same time encouraging adherence to the DGA, USDA should allow for more flexibilities in meal patterns to allow schools to offer more plant-based and plant-forward options.

In addition to school districts needing more flexibility to meet meal pattern requirements, students are increasingly asking for more plant-based options at school, whether it be for environmental, religious, health, ethical, or cultural reasons. Despite this growing demand, plant-based options are lacking in most school cafeterias, due in part to barriers created by USDA's school nutrition standards and guidance. One recent analysisⁱⁱ of California lunches showed that only four percent of entrée offerings were plant-based, and about half of those are nut butter and jelly. This is an opportunity for USDA to adjust its school nutrition standards and guidance to increase access to plant-based meal options.

Plant-based foods are affordable, healthy, versatile, a good source of fiberⁱⁱⁱ, and have a low GHG footprint.^{iv} Plant-based foods are generally also under-consumed relative to *Dietary Guidelines* recommendations.^v Finally, plant-based ingredients such as beans, peas, lentils, and soy products are affordable proteins that have not been as impacted by the supply chain challenges as many animal-sourced proteins.^{vi} To meet student demand, increase variety, and help school meals meet the DGA's recommended intakes, the Food and Nutrition Service (FNS) should create more opportunities to offer a variety of fiber-rich, plant-forward protein choices to children. USDA can help facilitate access to more plant-based items while supporting solutions to supply chain issues by:

1. Allowing beans, peas, and lentils to qualify as meat/meat alternate (M/MA) even if not visually recognizable;

2. Enabling beans, peas, and lentils to credit as both a vegetable and M/MA if served in sufficient quantities, and allow the same pulse dish to credit as a vegetable or M/MA in a single day;
3. Diversifying protein options by allowing more flexibility for beans/peas/lentils to credit as M/MA;
4. Enabling quinoa and other “complete” grains that are not limited in amino acids to qualify as M/MA;
5. Creating more consistent and practical nutritional equivalencies for M/MA; and
6. Renaming the Meat/Meat Alternate category.

Recommendation #1: Allow beans, peas, lentils (and silken tofu) to qualify as meat/meat alternate (M/MA) even if not visually recognizable.

If beans, peas, and lentils (pulses) are to credit as a vegetable, they do not necessarily have to be visually recognizable.^{vii} For example, a red lentil pasta can credit as a vegetable, as could beans pureed in a smoothie.^{viii} However, to credit as M/MA, the red lentil pasta must be served with another visible meat or meat alternate, such as cheese or meat,^{ix} and the pureed bean smoothie could not credit as M/MA at all.^x There is no justification for the disparate treatment of pulses crediting as vegetables versus M/MA in the DGA. Instead, FNS should provide school food operators flexibility to offer beans, peas, and lentils, and silken tofu as M/MA in forms that are attractive and familiar to students, such as pulse-based pastas, dips, and pureed soups. It is important for students to both consume adequate quantities of pulses and to learn that there are a number of ways they can consume these healthy, versatile foods inside and outside of school.

Recommendation #2: Enable beans, peas, and lentils to credit as both a vegetable and M/MA if served in sufficient quantities and allow the same pulse dish to credit as a vegetable or M/MA in a single day.

School foodservice professionals are currently allowed to serve beans, peas, and lentils to satisfy the M/MA or vegetables components but not both in the same dish even if the quantity served is sufficiently large.^{xi} For example, a chili with beans and beef or soy crumble is allowed, while chili with multiple types of pulses is not allowed to credit for both the vegetable and M/MA component, despite the fact that it provides appropriate quantities of protein for the M/MA component. Similarly, a given dish with beans, peas, and lentils cannot count for one student as a vegetable and another as an M/MA on the same day. This is an unnecessary barrier and can be especially challenging for schools dealing with supply chain and/or financial issues and cannot acquire specific products to fulfill this requirement. Further, this represents a challenge for students who cannot or do not wish to consume animal products, because it limits their ability to combine meal components for a fully reimbursable meal consistent with their dietary needs. There is no justification in the DGA for either of these requirements.

Recommendation #3: Diversify protein options by allowing more flexibility for beans/peas/lentils to credit as M/MA.

Often, when pulses are served as a side to meet the weekly vegetable subgroup requirement, students do not choose or eat them due to the challenges of making them more appealing.^{xii} However, when mixed with other ingredients, beans, peas, and lentils can provide a plethora of tasty entrees. To diversify students’ protein sources and reduce the carbon footprint of our menus, FNS should incentivize districts to use beans, peas, and lentils as M/MA in order to get students to eat more of these nutritious and under-consumed foods. For example, instead of having beans, peas, and lentils as a vegetable subgroup requirement, FNS could create a

standalone beans, peas, and lentils weekly requirement that could be met either by serving them as a vegetable or as M/MA.

Recommendation #4: Enable quinoa and other “complete” grains that are not limited in amino acids to qualify as M/MA.

Quinoa is classified as a whole grain, with one cup cooked providing about 8 grams of protein. The protein in quinoa, like that of beef, pork, eggs, fish, dairy, and soy, is complete – meaning that it contains all nine essential amino acids the human body needs. Insofar as FNS allows for other meat alternates that are not within the Protein Foods Group in the DGA, such as cheese, to be used to meet all or part of the M/MA component, the Agency should also allow foods from other food groups, including certain pseudo-grains with complete protein, such as quinoa, amaranth, and buckwheat.

Recommendation #5: Create more consistent and practical nutritional equivalencies for M/MA.

We believe USDA’s nutritional equivalencies for certain foods – namely, tofu, nut butters, and cheese – are inconsistent with nutrition science and impractical from an operational standpoint. For example, currently, 2.2 oz of tofu containing at least 5 grams of protein is creditable as a 1.0 oz equivalent meat alternate.^{xiii} To credit at 2 M/MA, 4.4 oz of tofu containing 10 grams of protein would need to be offered per entrée, which is simply too much tofu – negatively impacting taste and leading to food waste. For example, for tofu chicken nuggets to credit as 2 M/MA, schools would have to serve 10 tofu nuggets - twice as many as is required for chicken nuggets. To be more consistent, tofu’s nutritional equivalency should be lowered to around 1.5 oz per M/MA, which provides between 3.4g and 7.3g of protein depending on the type of tofu (soft vs firm). When compared to other M/MA options like bologna (which contains 2.76g of protein per 1 oz.), the reduced equivalent serving of tofu still provides a larger quantity of protein per 1 M/MA serving.

The nutritional equivalencies for nut butters and cheese are also out of alignment with their recommended serving sizes. A nut butter sandwich would need to include 4 tablespoons of nut butter to credit as 2 M/MA, which is not an appealing proportion of bread to nut butter for most students. For cheese, a grilled cheese sandwich would require ~3.5 average slices of cheese, which is equivalent to 3.5 recommended serving sizes, to credit as 2 M/MA.

Recommendation #6: Rename the Meat/Meat Alternate category

FNS should abandon the term “Meat/Meat Alternate,” which is not a term found in the DGA. The term “meat alternate” creates a negative perception of plant-based sources of protein, and is confusing to foodservice professionals, parents, and students. USDA’s My Plate tool has already moved away from “meat/meat alternate” in favor of the term “Protein Foods Group’ [which] includes beans, peas, lentils, nuts, seeds and soy products.”

We urge FNS to foster greater alignment with the *Dietary Guidelines*, lower the carbon footprint of school meals, and allow school food operators to be more creative in the ways they are offering plant-forward protein options by making these changes to its school nutrition standards. FNS has the authority to issue guidance immediately to allow pulses to credit fully as M/MA even if not visually recognizable; to enable quinoa and other complete grains to qualify as M/MA; and to create more consistent nutritional equivalencies for M/MA.

FNS should also initiate rulemaking to allow beans, peas, and lentils to credit as both a vegetable and M/MA if served in sufficient quantities; allow the same pulse dish to credit as a vegetable or M/MA in a single day; and rename the meat/meat alternate category.

These changes will help increase access to healthy, minimally processed plant-based foods that are under-consumed by the diverse student population served by the NSLP, as well as assist school districts to continue serving nutritious, culturally appropriate meals during these challenging times.

Thank you for your consideration.

Respectfully,

School Districts

Adelanto Elementary School District
Arcata School District
Austin ISD Food Service Department
Ayer Shirley Regional Schools
Berkeley Unified School District
Black River Local Schools
Capistrano Unified School District
Carpinteria Unified School District
Culinary Services - Seattle Public Schools
El Monte Union High School District
Fallbrook Union High School District
High Tech High
Hueneme Elementary School District
Laguna Beach Unified School District
Lennox School District
Live Oak School District
Los Alamitos Unified School District
Los Gatos Union School District
Manchester Public Schools
Manhattan Beach Unified School District
Manor Independent School District
Morgan Hill Unified School District
Mount Mansfield Unified School District
Mt. Lebanon School District
Nederland ISD
Oxford Area School District
Oxnard School District
Oxnard Union High School District
Paso Robles Joint Unified School District
PUC National

PUC Schools
Quincy Public Schools
Regional School Unit #21 School Nutrition Program
Richland School District
Ross Valley School District
San Francisco USD
San Marino Unified School District
San Ramon Valley Unified School District
Saugerties Central School District
The School District of Lee County
Stanislaus Union School District
Staunton City Schools
Tahoe Truckee Unified School District
Temecula Valley Unified School District
Walnut Creek Elementary School District
West Contra Costa Unified School District
Yuba Environmental Science Charter Academy
Yucaipa-Calimesa Joint Unified School District

Plant-Based Food Companies

All Y'all's Foods
Atlantic Natural Foods, LLC
The Herbivorous Butcher
Jindilli Beverages LLC
MyForest Foods
NadaMoo!
No Evil Foods
Northbest Natural Products
The Tofurky Company
VAN HEES

Victory Hemp Foods
Veje.com
Zero Egg

NGOs

350 Seattle
A Well-Fed World
Acterra
Advocates for Better Children's Diets
Agriculture Fairness Alliance
American Society for the Prevention of Cruelty to
Animals (ASPCA)
Animal Welfare Institute
Balanced
Better Food Foundation
Black VegFest
Black Veg Society
Brighter Green
Center for Biological Diversity
Center for Good Food Purchasing
Chef Ann Foundation
Chilis on Wheels
Coalition for Healthy School Food
Compassion in World Farming
Cool Beans
Corpus Christi Vegfest
Cultivate Empathy for All
Current Foods
DC Greens
Del Norte and Tribal Lands Community Food
Council
Earthjustice
Eat for the Earth
Eat REAL
Environmental Working Group
Factory Farming Awareness Coalition
Family & Friends of Incarcerated People
Farm Forward
Farm Sanctuary
Farms to Grow, Inc.

First Focus on Children
food + planet
Food Empowerment Project
FoodCorps
Friends of the Earth, U.S.
FRESHFARM FoodPrints
GARDEN, Inc.
Healthy Kids. Happy Planet!
Healthy School Food Maryland
Hudson Valley Farm Hub
Humane Society Legislative Fund
The Humane Society of the United States
Jewish Veg
John Hopkins Center for a Livable Future
Liberation Farm
LunchAssist
Mercy For Animals
National Farm to School Network
Natural Resources Defense Council
New Yorkers for Clean, Livable, and Safe Streets
(NYCLASS)
Oldways
Perfectly Pl@nted
Physicians Committee for Responsible Medicine
Pittsburgh Food Policy Council
Planetary Health Collective
Plant Based Foods Association
Plant Based Nutrition Movement
Plant-Based Advocates
ProVeg US
The Raven Corps
Real Food for Kids
Rowdy Girl Sanctuary, Inc.
SanDiego350
School CAFE
Society of Behavioral Medicine
Urban School Food Alliance
Wellness in the Schools
Wholesome Wave

ⁱ USDA, [Dietary Guidelines for American 2020-2025](#).

ⁱⁱ Friends of the Earth, [The State of School Lunch in California: Opportunities for Improving the Health and Environmental Profile of School Foods](#) (March 2021).

ⁱⁱⁱ Crichton-Stuart C, [High-fiber foods for a healthful diet](#), (Sept. 21, 2018) Med. News Today.

^{iv} IPCC, 2019: [Summary for Policymakers. In: Climate Change and Land: an IPCC special report on climate change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystems](#) [P.R. Shukla, J. Skea, E. Calvo Buendia, V. Masson-Delmotte, H.-O. Pörtner, D. C. Roberts, P. Zhai, R. Slade, S. Connors, R. van Diemen, M. Ferrat, E. Haughey, S. Luz, S. Neogi, M. Pathak, J. Petzold, J. Portugal Pereira, P. Vyas, E. Huntley, K. Kissick, M. Belkacemi, J. Malley, (eds.)]. In press.

^v USDA, *supra note 1* available at 49.

^{vi} School Nutrition Association, [2021 Supply Chain Survey Report: A Summary of Survey Results](#),

^{vii} FNS, Policy [Memo SP 38-2019](#), Meal Requirements under the National School Lunch Program and School Breakfast Program: Questions and Answers for Program Operators (Sept 23, 2019).

^{viii} FNS, Policy [Memo SP40 CACFP17 SFSP17-2019](#), Smoothies Offered in Child Nutrition Programs (Sept. 23, 2019).

^{ix} FNS, Technical Assistance and Guidance document [#899](#), Serving Meats and Meat Alternates at Lunch and Supper in the USDA CACFP (Jul. 28, 2021).

^x See Policy [Memo SP40 CACFP17 SFSP17-2019](#), which provides, “Yogurt is the only creditable meat/meat alternate allowed in a smoothie.”

^{xi} 7 CFR 210.10(c)(2)(iii).

^{xii} These findings are based on extensive interviews with more than 20 School foodservice and nutrition professionals. It is also aligned with the findings in USDA’s School Nutrition and Meal Cost Study showing that vegetables are wasted at a higher rate than combination entrees (see [Table 5.1 in Volume 4](#)).

^{xiii} FNS, Crediting Tofu and Soy Yogurt Products in the School Meal Programs and the Child and Adult Care Food Program, [Policy Memo SP53 CACFP21-2016](#) (Aug. 8, 2016).