

October 17, 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 beans, peas, and lentils, in alignment with the Dietary Guidelines for Americans (DGA).ⁱ

Demand for plant-based foods is growing rapidly among our youth due to environmental, religious, health, or cultural reasons. Despite 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 analysis of California lunches showed that only four percent of entrée offerings were plant-based, and about half of those are nut butter and jelly.ⁱⁱ

Beans, peas, and lentils are good sources of plant-based protein and are healthy, affordable, and versatile. These high-fiber foods are also under-consumed relative to Dietary Guidelines recommendations. School food operators face unnecessary hurdles in serving these foods, which can be overcome with the following changes to USDA's school nutrition standards:

1. Allow beans, peas, lentils, tofu, and soy products to qualify as meat/meat alternate (M/MA) even if not visually recognizable;
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; and
3. Diversify protein options by allowing more flexibility for beans/peas/lentils to credit as M/MA.

Health and Environmental Benefits

The DGA notes that more than 80% of Americans do not meet the recommendation for beans, peas, and lentils.ⁱⁱⁱ These foods are crucial sources for dietary fiber, folate, potassium, iron, and zinc.^{iv} In order to bring school meals into greater alignment with USDA's recommended intakes and increase the variety of protein choices available to children, FNS should create more opportunities to offer beans, peas, and lentils.

Plus, pulses are the least GHG-intensive form of protein available in the school meal programs, so increasing these options on school menus can significantly lower the carbon footprint of our school meal program.^v

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.^{vi} For example, a red lentil pasta can credit as a vegetable, as could beans pureed in a smoothie.^{vii} 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,^{viii} and the pureed bean smoothie could not credit as M/MA at all.^{ix} 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.^x 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.^{xi} 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.

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 beans, peas, and lentils by making these changes to its school nutrition standards. FNS has the authority to issue guidance immediately to allow pulses to credit as M/MA even if not visually recognizable. 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 as well as allow the same pulse dish to credit as a vegetable or M/MA in a single day.

These changes will help increase access to healthy, minimally processed plant-based foods that are greatly under-consumed by the diverse student population served by the NSLP, many of whom lack access to these healthful foods at home and in their communities.

Thank you for your consideration.

Respectfully,

Friends of the Earth, U.S.
American Pulse Association
U.S. Dry Lentil & Pulse Council

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
El Monte Union High School District
Fallbrook Union High School District
High Tech High
Laguna Beach Unified School District
Live Oak School District
Los Gatos Union 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
Paso Robles Joint Unified School District
PUC National
Quincy Public Schools
Regional School Unit #21 School Nutrition Program
Richland School District
Ross Valley School District
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
Jindilli Beverages LLC
MyForest Foods
NadaMoo!
No Evil Foods
Northbest Natural Products
The Tofurky Company
VAN HEES
Victory Hemp Foods
Vejje.com
Zero Egg

NGOs

A Well-Fed World
Acterra
Agriculture Fairness Alliance
Animal Welfare Institute
Balanced
Better Food Foundation
Black VegFest
Black Veg Society
Brighter Green
Center for Biological Diversity
Chef Ann Foundation
Chilis on Wheels
Coalition for Healthy School Food
Compassion in World Farming
Cool Beans
Corpus Christi Vegfest

Cultivate Empathy for All	Jewish Veg
Current Foods	John Hopkins Center for a Livable Future
DC Greens	Liberation Farm
Del Norte and Tribal Lands Community Food Council	LunchAssist
Eat for the Earth	Mercy For Animals
Environmental Working Group	National Farm to School Network
Factory Farming Awareness Coalition	New Yorkers for Clean, Livable, and Safe Streets (NYCLASS)
Family & Friends of Incarcerated People	Northarvest Bean Growers Association
Farm Forward	Oldways
Farm Sanctuary	Perfectly Pl@nted
Farms to Grow, Inc.	Planetary Health Collective
First Focus on Children	Plant Based Foods Association
food + planet	Plant Based Nutrition Movement
Food Empowerment Project	Plant-Based Advocates
FoodCorps	ProVeg US
FRESHFARM FoodPrints	The Raven Corps
GARDEN, Inc.	Real Food for Kids
Healthy Kids. Happy Planet!	Rowdy Girl Sanctuary, Inc.
Healthy School Food Maryland	School CAFE
Hudson Valley Farm Hub	Urban School Food Alliance
Humane Society Legislative Fund	Wellness in the Schools
The Humane Society of the United States	

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 DGA At 30.

^{iv} U.S. Department of Agriculture, MyPlate Program, Beans, Peas, and Lentils, available at <https://www.myplate.gov/eat-healthy/protein-foods/beans-and-peas>. (Last accessed 5/9/2022).

^v World Resource Institute, [Protein Scorecard](#) (April 20, 2016).

^{vi} 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).

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

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

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

^x 7 CFR 210.10(c)(2)(iii).

^{xi} 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](#)).