



**NATIONAL POTATO COUNCIL**

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May 10, 2023

*Via Regulations.gov*

Tina Namian, Director  
School Meals Policy Division  
Food and Nutrition Service  
P.O. Box 9233  
Reston, Virginia 20195

**RE: [FNS-2022-0043] Child Nutrition Programs: Revisions to Meal Patterns Consistent With the 2020 Dietary Guidelines for Americans**

Dear Ms. Namian:

The National Potato Council (NPC) is pleased to provide the following comments on the US Department of Agriculture's (USDA) Proposed Rule on Revisions to Meal Patterns Consistent with the 2020 Dietary Guidelines for Americans.

NPC is the voice of the U.S. potato industry, and our growers and processor members are partners in delivering nutrition through the School Breakfast Program (SBP) and the National School Lunch Program (NLSP). Potatoes are the most widely produced vegetable in the United States contributing over \$100 billion to the country's economy each year.<sup>1</sup>

Potatoes are also an important vegetable in the American diet. Like other vegetables, white potatoes provide many essential nutrients to the diet, making them a nutritional powerhouse for kids. Potatoes unlike grains, are a strong contributor of potassium, calcium, vitamin C, and vitamin B6. They also are a unique source of fermentable fiber that play a role in the health of the gut

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<sup>1</sup> Knudson, W., & Miller, S. R. Measuring the Economic Significance of the U.S. Potato Industry. February 2023  
<https://www.nationalpotatocouncil.org/wp-content/uploads/2023/02/NPCSpudNationReport.pdf>.

microbiome.<sup>2</sup> Potatoes are versatile, making it easy for school food service directors to incorporate them into menus. Not only can potatoes be served individually, but they are a “springboard vegetable,” meaning they are easily paired with other - less-consumed vegetables. Through these pairings, potatoes play a key role in enhancing consumption of the vegetable category overall. Therefore, potatoes are valuable components within the SBP and NSLP in helping to introduce children to other types of vegetables, increase school breakfast participation, and reduce plate waste.<sup>3</sup>

NPC supports USDA’s efforts to provide our nation’s school children with healthy meals that they enjoy. As USDA moves forward on the proposal, we ask the Department to consider the following points outlined below.

### **Substituting vegetables for fruit at breakfast**

NPC supports USDA’s efforts to increase vegetable intake in line with the 2020 Dietary Guidelines for Americans (DGA) recommendation to increase consumption of vegetables. More specifically, NPC supports USDA’s proposal to ease the burden for school meal operators and provide flexibility to substitute vegetables for fruit at breakfast. However, we believe that USDA has an opportunity to do more to increase vegetable consumption by permitting any vegetable, without limitation, to be served, and credited, in the SBP.

Historically, there have been many regulatory and financial challenges for schools that wish to serve vegetables, and particularly potatoes, for breakfast. Current regulations allow schools to substitute vegetables for fruits at breakfast but require that the first two cups per week are from the dark green, red/orange, beans and peas (legumes), or other vegetable subgroups. By this regulation, potatoes, and other kid-preferred vegetables, could only be served if schools first served a significant amount of less preferred vegetable subgroups, which could result in food waste.

The current policy limits the opportunity for schools to offer school children options that may be more popular, such as serving potatoes together with other vegetable subgroups.

Over the past several years, Congress (via the annual Agricultural Appropriations Bill)<sup>4</sup> has weighed in to ensure that schools have the flexibility to serve any vegetable as a substitute for fruit at breakfast, with no limitation. As USDA has noted in the proposed rule, it has been confusing for state agencies and schools to have “a requirement in regulation and policy that is repeatedly changed through Congressional action.”

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<sup>2</sup> Baxter NT, Schmidt AW, Venkataraman A, Kim KS, Waldron C, Schmidt TM. Dynamics of Human Gut Microbiota and Short-Chain Fatty Acids in Response to Dietary Interventions with Three Fermentable Fibers. *MBio*. 2019;10(1):e02566-18. Published 2019 Jan 29. doi:10.1128/mBio.02566-18

<sup>3</sup> Capps et al. Examining vegetable plate waste in elementary schools by diversity and grade. *Health Behavior and Policy Rev*. 2016;3(5):419-428(10).

<sup>4</sup> H.R.2471 - 117th Congress (2021-2022): Consolidated Appropriations Act, 2022, H.R.2471, 117th Cong. (2022), <https://www.congress.gov/bill/117th-congress/house-bill/2471/text>.

**But while USDA’s proposed rule attempts to correct current regulatory limitations of serving potatoes at breakfast, the approach does not remove these challenges and thereby continues to limit serving potatoes without scientific justification.**

USDA takes steps to address regulatory limitations by continuing to allow vegetables to substitute for fruit but does not eliminate them. Instead, the proposed rule updates the regulation such that *“schools that substitute vegetables for fruits at breakfast more than one day per school week would be required to offer a variety of vegetable subgroups. In other words, schools that substitute vegetables more than one day per school week would be required to offer vegetables from at least two subgroups.”* USDA provides an example of if a school offers a starchy vegetable on a Monday, they will then need to offer different vegetable subgroup on a different day before offering a starchy vegetable again.

NPC understands the desire to ensure a variety of vegetables are served within school meal programs but simply mandating that schools serve different subgroups of vegetables does not mean children will consume them. Moreover, we believe that this proposal will be confusing to school meal operators and does not give them the flexibility to determine the best way to increase vegetable consumption. Now, more than ever, schools are looking for broad flexibility to address increasing challenges, especially those related to costs. According to the 2023 School Nutrition Trends Report<sup>5</sup>, the number one challenge of school meals program is increasing costs. In fact, 99.8% of respondents in the study “indicated increasing costs as a challenge for their school nutrition program.” At less than 20 cents per serving, potatoes are not only a low-cost option for schools, but research suggests that when paired with other vegetables (red/orange, green) in recipes are a cost-efficient way to increase consumption of other vegetables subgroups.<sup>6</sup>

NPC believes that the proposed rule is arbitrarily limiting opportunities to increase vegetable consumption within school breakfast programs. For example, if a school meal operator chooses to serve roasted potatoes with eggs at breakfast instead of fruit on Monday, they could not be reimbursed for the potatoes served on Wednesday in a “Potatoes O’Brien” (a popular vegetable hash of diced potatoes, green and red peppers, onions, garlic, and spices). If a school decides to substitute a vegetable for fruit two days a week, they should be able to choose any vegetable that they believe will be accepted by children.

NPC maintains that all vegetables should be permitted to substitute for fruit within the school breakfast program **without** limitations or restrictions. The *2020-2025 Dietary Guidelines for Americans (DGA)* emphasize building healthy eating patterns with recommended amounts of fruits and vegetables early in life.<sup>7</sup> The DGA confirms most people are not eating enough fruit and vegetables by age 2. According to a 2020 Produce for Better Health Foundation, approximately 9 in

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<sup>5</sup> School Nutrition Trends Report, School Nutrition Association. 2023 <https://schoolnutrition.org/wp-content/uploads/2023/01/2023-School-Nutrition-Trends-Report.pdf>

<sup>6</sup> Ishdorj A, Capps Jr. O, Storey M, Murano PS. Investigating the relationship between food pairings and plate waste from elementary school lunches. *Food and Nutrition Sciences*. 2015;06(11):1029-1044. doi:10.4236/fns.2015.611107

<sup>7</sup> U.S. Department of Agriculture and U.S. Department of Health and Human Services. *Dietary Guidelines for Americans, 2020-2025*. 9th Edition. December 2020. Available at [DietaryGuidelines.gov](https://www.dietaryguidelines.gov).

10 Americans do not eat enough fruits and vegetables, and consumption overall has declined by about 10% since 2004.<sup>8</sup> As vegetables overall are under-consumed in the American diet, efforts should be focused on making it easier to increase vegetable consumption in the diet and particularly in the school meals program.

To address this issue long-term, prevent confusion, and increase overall vegetable intake within the program, **NPC urges USDA to permit any vegetable to substitute for fruit within SBP without limitation.** To increase vegetable subgroup variety, USDA should instead focus on education, training, and resources for school meal operators on how to utilize other vegetables within SBP.

### **Permitting certain vegetables to substitute for grains in school meals**

While the DGA broadly recommends “making your plate fruits and vegetables”, NPC notes that grains are a separate and distinct food group from fruits and vegetables in federal dietary recommendations. We appreciate the cultural significance that is intended to be addressed in USDA’s proposal to expand the allowance of substituting certain vegetables in the place of grains for tribal schools and those that serve American Indian and Alaskan natives.

However, NPC believes it is important to note that nutritionally, vegetables such as potatoes, are not interchangeable with grains. While we fully support efforts to ensure that students in schools have access to culturally preferred options, it is also important to ensure they get the broad array of nutrients that they need. Grains are a key source of iron, folate, and some B vitamins. In contrast, starchy vegetables like white potatoes are a rich source of potassium, vitamin C, and vitamin B6.

NPC is concerned that while swapping grains for vegetables, two very different food groups, may increase intakes of some nutrients, others will decrease significantly. Therefore, we caution USDA in considering vegetables, including starchy vegetables, and grains interchangeable within any school meals. Both play a fundamental, yet distinctly different role in contributing nutrients to kids diets every day.

### **Sodium limits and compliance timeline**

NPC supports USDA’s continued efforts to reduce sodium consumption within school meals. However, NPC members are concerned that the proposed target levels for both SBP and NSLP, and the timing for implementation of these targets, is unachievable for manufacturers or school meal operators. Schools are still in the process of transitioning to Interim Sodium Target 1A beginning in School Year (SY) 2023-2024.

On average, it takes three years for manufacturers to reformulate products and participate in the school bidding process. As USDA has noted in the proposed rule, there are unique challenges in reducing sodium including that sufficient time is needed for product reformulation and gradual introduction to students to ensure acceptance. To sell products to schools, specifications for products must be available for schools twelve months in advance to participate in the bidding cycle.

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<sup>8</sup> Produce For Better Health Foundation. 2020 PBH State of the Plate: America's Fruit & Vegetable Consumption Trends. 2021. <https://fruitsandveggies.org/stateoftheplate2020/>

Putting further sodium reduction targets in place for SY2025-2026, for example, would not provide sufficient time to make product changes and go through a bid-cycle. While NPC does not oppose USDA's approach to further sodium reduction overall, we ask USDA to consider allowing for more time between each stage of reduction to account for product reformulation and supply chain complexities.

Finally, NPC does not support USDA's future plans to include sodium limits for specific foods, such as condiments and sandwiches, within the school meals program. NPC supports USDA's current meal-pattern approach within these programs and believes that product-based limits or targets will create additional challenges for school meal operators. We believe that a meal-pattern approach overall provides the most flexibility to school meal operators to provide a variety of options while meeting the nutritional needs of students.

### **Conclusion**

Thank you for the opportunity to comment and your consideration of our recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Kam Quarles". The signature is fluid and cursive, with the first name "W." and last name "Quarles" clearly visible.

W. Kam Quarles  
Chief Executive Officer  
National Potato Council