May 10, 2023

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

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

Re: FNS-2022-0043, Proposed Rule: Child Nutrition Programs – Revisions to Meal Patterns Consistent with the 2020 Dietary Guidelines for Americans

Submitted online at https://www.regulations.gov

Dear Secretary Vilsack and Director Namian,

Thank you for the opportunity to comment on the U.S. Department of Agriculture Food and Nutrition Service (FNS) Proposed Rule: Child Nutrition Programs (CNPs) – Revisions to Meal Patterns Consistent with the 2020 Dietary Guidelines for Americans (DGA). DC Greens commends the USDA FNS for its efforts to improve the nourishment and quality of school meals to better support our nation’s children both today and – given the vital role food and nutrition plays in our health, wellbeing, and environment – into the future.

I. Introducing DC Greens

DC Greens is a Black-led, multiracial organization that uses the power of equitable food policy, education, and access to build a more just and resilient food system in our nation's capital. Our vision for health equity is a city where each of us has the ability to shape the policies and institutions that have an impact on our wellbeing.

DC Greens believes all communities have a right to self-determine their relationship to food. We work with DC residents experiencing food insecurity to build power using tools and strategies to influence the production, accessibility and affordability of nutritious foods. Our key programmatic pillars position us to advance health equity in collaboration with community members, peer organizations and partners in government. DC Greens’ Produce Prescription Program advances a “Food as Medicine” approach. Our team equips medical professionals to prescribe fresh fruits and veggies to patients with lower incomes managing diet-related illnesses such as diabetes, pre-diabetes and hypertension. In Ward 8, DC Greens’ farm and intergenerational wellness
space The Well is our latest community health intervention — a place-based endeavor that promotes healing in healthy green spaces as well as programming that addresses the root causes of food insecurity. DC Greens also co-convenes the DCPS School Food Collaborative where we have heard, time and again from students, parents and school food service professionals about the desire for school meal programs that better align with community food values including food that is locally sourced, nutritious and from farms that support fair, humane and sustainable practices.

In alignment with and in service of our mission, vision, and core values, enclosed are DC Greens’ comments on the USDA Food and Nutrition Service (FNS) Proposed Rule: Child Nutrition Programs (CNPs) – Revisions to Meal Patterns Consistent with the 2020 Dietary Guidelines for Americans (DGA), published in the Federal Register on February 7, 2023 under document number 2023-06666 (the agency number is FNS-2022-0043).

II. Aligning with USDA’s Mission, Vision, and Core Values

DC Greens is advocating for maintaining several changes in the Proposed Rule – as well as making updates to what USDA is proposing – so that the Final Rule will not only support FNS in its endeavors to best nourish our nation’s children but also support USDA’s broader mission and vision to spur economic development and preserve our environment as well as align with its core values, including respect and dignity; equity and inclusion; and science leadership.¹ Our proposals are not only evidence-based and equity-centered but also holistic in nature. We aim to nourish children while at the same time consider child nutrition programs in the context of the broader systems in which they exist and the myriad impacts they have on our children, communities, agricultural producers, and the environment. Thus, our comments are essential both for nourished children and also for a healthy planet and thriving communities, all bolstered by emphasizing menus centered in six values: nutrition, environmental sustainability, racial equity and justice, a valued workforce, local economies, and animal welfare.

Our recommendations are in alignment with and service of USDA’s mission “To serve all Americans by providing effective, innovative, science-based public policy leadership in agriculture, food and nutrition, natural resource protection and management, rural development, and related issues with a commitment to deliver equitable and climate-smart opportunities that inspire and help America thrive.”² Additionally, our recommendations align with USDA’s vision “to provide economic opportunity through innovation…to promote agriculture production that better nourishes Americans…and to preserve our Nation’s natural resources through conservation…”³

¹ U.S. Department of Agriculture. Strategic Plan Fiscal Years, 2022-2026. March 2022, p.3
² U.S. Department of Agriculture. Strategic Plan Fiscal Years, 2022-2026. March 2022, p.3.
Lastly – and of utmost importance – our recommendations align with USDA’s core values, including prioritizing equity in everything it does. As the Agency explains, “USDA can only succeed in its mission to help America thrive – and can only live up to President Lincoln’s description of it as the ‘People’s Department’ – if it ensures that the Americans who need its services most receive them. Equity is not an add-on or extra.”⁴

At present, there are aspects of the meal patterns that could do more to make it possible, within the Agency’s purview to inclusively nourish our children and respect our differences; protect our precious resources; and support a fair and sustainable agricultural economy.

The vast majority of spending on public food procurement contradicts the Administration’s stated interests of addressing climate change, advancing racial equity, protecting public health, achieving nutrition security, and strengthening local economies, among other key issues. This is due in large part to the state of U.S. food systems and supply chains, which compromise public health and well-being with disproportionate impacts for Black, Indigenous, and other people of color (BIPOC) through the exploitation of food and farm workers, concentration of corporate wealth, degradation of natural resources, and production of highly processed foods with low nutritional value.

III. Achieving USDA’s Goals by Facilitating Values-Aligned Procurement

To achieve USDA’s goals – broadly as an Agency and specifically in updating the CNP meal patterns to align with the DGA – USDA must foster the inclusion of values-aligned procurement. In the same way that federal energy procurement has accelerated the transition to clean energy across the U.S. economy, food procurement can be a driver for the just, nutritious, and sustainable food system we desperately need.

We urge USDA to bring federal food purchasing practices into alignment with its policy objectives to achieve racial justice, fight climate change, support family farms, strengthen local economies, ensure nutrition security, support food and farmworkers, and protect animal welfare. We refer to this concept as values-aligned food procurement, and in DC Greens’ comments, we provide concrete steps USDA must take in the Final Rule for child nutrition program meal patterns.

In the last decade, 27 public school districts – representing more than $370 million in annual spending and serving 2.9 million children – have adopted the Good Food Purchasing Program (GFPP), a flexible, values-aligned procurement framework.⁵ USDA should support these districts in living up to their commitments, as well as encourage and facilitate other CNP operators in purchasing in line with these holistic values. To date, these admirable efforts represent but a fraction of the nation’s SFAs. In Fiscal Year 2021, total expenditures on CNPs

were $28.4 billion. That year, the National School Lunch Program (the largest portion of CNP operations) served 2.2 billion meals. What’s more is the significance of CNP spending on public health and the economy. The Rockefeller Foundation and the Center for Good Food Purchasing found that school meal programs “provide nearly $40 billion in human health and economic benefits even when we measure only their benefits to human health and economic equity.” Notably, these figures do not yet factor in the benefits to public health and the economy that will come with USDA’s inclusion of the full suite of values.

Considering the significant gap between current and potential values-aligned procurement – and the alignment of this purchasing with USDA’s charge – the Final Rule must enable the full spectrum of values outlined below. Not only does values-aligned procurement support alignment with the DGA, it also supports USDA’s climate and conservation goals; meets student and operator demand; and advances the Agency’s core values of respect, dignity, equity, and inclusion.

a. Nutrition

Advancing nutrition is, of course, the value at the center of the CNP meal patterns, as well as the DGA that informs them. As explained by the Center for Good Food Purchasing, comprehensively advancing nutrition means that USDA will “Promote health and well-being by offering generous portions of vegetables, fruit, whole grains, and minimally processed foods, while reducing salt, added sugars, saturated fats, and red meat consumption and eliminating artificial additives.” Accomplishing this aligns with some of what USDA has already proposed, however, there are additional, important strategies – aligned with both the DGA and values-aligned purchasing – to ensure the best nutrition for our children via the Final Rule.

To best foster good nutrition in the Final Rule, USDA must:

Section 2: Added sugars
- Maintain in the Final Rule: Limit added sugars in school meals and CACFP. Maintain both the proposed product-specific limits and the weekly limits.
- Update in the Final Rule: Prevent product reformulations that use artificial sweeteners in place of added sugars.

Section 3. Milk
- Update in the Final Rule: Limit access to flavored milk and facilitate access to non-dairy substitutes instead.

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8 Center for Good Food Purchasing. The Program: Values. https://goodfoodpurchasing.org/program-overview/#values
Section 4: Whole Grains
→ Update in the Final Rule: Require that all grains in school meals be whole grain-rich; or Require that 90 percent of grains in school meals be whole grain-rich and adopt a minimum fiber standard of 14 grams per 1,000 kilocalories per day.

Section 5. Sodium
→ Update in the Final Rule: Strengthen the proposed sodium limits to fully align with the most recent DGA.
→ Update in the Final Rule: Encourage schools to prioritize reductions in sodium via eliminating processed meats.

Section 10. Nuts and Seeds
→ Maintain in the Final Rule: Allow nuts and seeds to credit for 100 percent of the meat/meat alternate component in all child nutrition programs and meals.
→ Update in the Final Rule: Align the nutritional equivalency FNS has set for nuts and seeds – as well as nut and seed butters – with the DGA.

Section 15: Miscellaneous Changes
→ Update in the Final Rule: Include quinoa and other grains high in protein in the new “protein sources” meal component.
→ Update in the Final Rule: Phase out processed meats.
→ Update in the Final Rule: Encourage schools to offer daily plant-based options beyond a nut butter sandwich.
→ Update in the Final Rule: Allow beans, peas, and lentils – as well as tofu and soy products – to qualify as a meat alternate even if they are not visually recognizable under specified circumstances.
→ Update in the Final Rule: Allow red lentil pasta to credit as a meat alternate regardless of whether it is served alongside a visually recognizable meat/meat alternate, and allow beans, peas, and lentils to credit as a meat alternate in smoothies.
→ Update in the Final Rule: Clarify that beans, peas, and lentils can credit as both a vegetable and meat alternate on the same day if served in sufficient quantities.
→ Update in the Final Rule: Allow a single pulse dish to credit as a vegetable or meat alternate on the same day.

Section 17. Proposals from Prior USDA Rulemaking
→ Maintain in the Final Rule: Allow pulses offered as a meat alternate to count toward the weekly pulse vegetable requirement.

b. Environmental Sustainability
Prioritizing environmental sustainability in food supply chains can shift U.S. food systems away from practices that contribute to climate change and pollute BIPOC communities and towards a more equitable, sustainable use of our soil and water. This includes prioritizing foods produced sustainably, as well as ensuring protections from existing food and farm-related pollution for frontline farm and food workers and adjacent communities.

Incorporating environmental sustainability into CNP procurement syncs with USDA’s role “to preserve our Nation’s natural resources through conservation, restored forests, improved watersheds, and healthy private working lands”\(^9\) and grow the organic market.\(^10\) CNPs are a substantial part of USDA’s work yet so far have not been linked to the agency’s climate and conservation initiatives.

When the National School Lunch Act was passed in 1946, it established the goal of the school meal program to “safeguard the health and well-being of the Nation’s children.”\(^11\) Today, living up to that intention means leveraging the seven billion school meals each year to help combat the greatest threat facing this and future generations of children: climate change. Students are bringing their conservation mindsets and climate activism to the cafeteria, and plant-rich diets are a crucial solution to the climate crisis that they face.\(^12\) Reams of scientific studies show that industrial animal agriculture plays a major role in driving climate change and that plant-rich diets are a highly effective way to reduce our impact on the climate.\(^13\) Plant-rich diets also require less land\(^14\) and fewer water resources.\(^15\) Therefore, facilitating more plant-forward menus is a key strategy to achieve USDA’s climate and conservation goals.

Strategies to accomplish more environmentally sustainable CNP procurement include plant forward menus, which feature smaller portions of animal proteins in a supporting role,\(^16\) and serving organic and other sustainably produced foods. Therefore, the Final Rule must specifically allow, encourage, and support these strategies throughout.

To best foster environmental sustainability in the Final Rule, USDA must:

\(^{11}\) 42 U.S.C. 1751
\(^{16}\) Center for Good Food Purchasing. The Program: Values. https://goodfoodpurchasing.org/program-overview/#values
Section 3: Milk
→ Update in the Final Rule: Modify the Serve model for middle and elementary schools such that milk is always an optional meal component to reduce food waste and ensure students can choose meals that align with their values.

→ Update in the Final Rule: Encourage procurement specifications for “products produced in an environmentally sustainable manner” and for “products produced by a certified organic farm or ranch.”

Section 15: Miscellaneous Changes
→ Update in the Final Rule: Phase out processed meats.
→ Update in the Final Rule: Encourage schools to offer daily plant-based options beyond a nut butter sandwich.
→ Update in the Final Rule: Allow beans, peas, and lentils – as well as tofu and soy products – to qualify as a meat alternate even if they are not visually recognizable.
→ Update in the Final Rule: Allow red lentil pasta to credit as a meat alternate regardless of whether it is served alongside a visually recognizable meat/meat alternate, and allow beans, peas, and lentils to credit as a meat alternate in smoothies.
→ Update in the Final Rule: Clarify that beans, peas, and lentils can credit as both a vegetable and meat alternate on the same day if served in sufficient quantities.
→ Update in the Final Rule: Allow a single pulse dish to credit as a vegetable or meat alternate on the same day.

Section 17. Proposals from Prior USDA Rulemaking
→ Maintain in the Final Rule: Allow pulses offered as a meat alternate to count toward the weekly pulse vegetable requirement.

c. Valued Workforce

The workers who harvest, process, transport, prepare, and serve food deserve the same benefits and legal protections as workers in other industries in our country, however, many do not currently have these. Throughout the supply chain, the federal government must protect the right of workers to organize, ensure healthy and safe working conditions, and pay living wages to frontline food workers.

As the Center for Good Food Purchasing explains, a valued workforce will be achieved through procurement that “Ensure[s] that food suppliers respect workers’ rights to freedom of association and to bargain collectively for better wages and working conditions, free from retaliation.”
Making updates to the Final Rule in alignment with a valued workforce will enable program operators to source from producers and vendors that value employees as full humans and enable them to thrive through strategies for well being (e.g., living wages, benefits, stability, safety).

To best foster a valued workforce in the Final Rule, USDA must:

- Update in the Final Rule: Encourage procurement specifications for “foods produced by a farm with employees who, as permitted by law, are represented by a collective bargaining agreement or memorandum of understanding” and “foods produced by a farm participating in a worker justice certification program.”

Section 15. Miscellaneous
- Update in the Final Rule: Clarify that CNP operators have the authority to terminate contracts with vendors who have a documented history of repeat and egregious labor violations.

d. Racial Equity and Justice

Progress towards a just food system requires us to address the historic and ongoing structural racism embedded in the U.S. food system and to actively promote food sovereignty and racial equity in food procurement, as well as culturally appropriate and inclusive menus.

Incorporating racial equity and justice into CNP purchasing aligns with values-aligned procurement and also uplifts USDA’s core values of respect, dignity, equity, and inclusion. USDA will accomplish this by concretely responding to children’s needs and concerns, resolving operators’ challenges, addressing the impacts of racism on current regulations, and encouraging operators to source from socially disadvantaged producers.

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 process lactose. The Proposed Rule itself affirms “the disproportionate rates of lactose intolerance among communities of color.” 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 CNPs accommodate the dietary needs of BIPOC students. The Final Rule must comprehensively foster plant-based and dairy-free options to better meet the dietary needs of all children – the ultimate beneficiaries of CNPs – and to uplift USDA’s core values of respect and dignity and advance its values of equity and inclusion.

17 U.S. Department of Agriculture. Strategic Plan Fiscal Years, 2022-2026. March 2022, p.3.
Along with dietary needs, dietary preferences must be considered in the context of equity and justice. 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. Thus, there is an important racial equity and justice case for ensuring the availability of environmentally sustainable plant-based options: 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 last year compared to 19 percent of white Americans.

Furthermore, as discussed in the context of a Valued Workforce, CNP meal pattern regulations require addressing ways in which BIPOC populations are not included and are continuing to be harmed. DC Greens appreciates that the Proposed Rule includes an explicit acknowledgment from USDA that “for decades, the [U.S.] government actively sought to eliminate traditional American Indian and Alaska Native ways of life [which] separated indigenous children from their families and heritage, and disrupted access to traditional foods, altering indigenous children’s relationship to food.” Encouraging and supporting the incorporation of traditional foodways into child nutrition programs is essential to USDA upholding its commitment to serve all Americans with dignity and inclusion.

Finally, USDA must address racial equity and justice in the Final Rule by allowing procurement specifications that advance racial and social equity. USDA is actively working to repair its longstanding history of institutional racism, oppression, and discrimination in its programs and services. The Agency explains its Equity Commission: “At USDA, we acknowledge we have not done enough to provide all farmers and ranchers an equal chance of success and prosperity. We are committed to changing that, actively working to build a USDA that ensures none of our customers are ignored or left behind.” A necessary step towards this goal is allowing its CNPs to contribute to this long overdue effort through purchasing both via guidance on specifications to prioritize diverse suppliers as well as bids structured to address barriers to entry for BIPOC-owned and -operated businesses.

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To best foster racial equity and justice in the Final Rule, USDA must:

**Section 3: Milk**
- Update in the Final Rule: Modify the Serve model for middle and elementary schools such that milk is always an optional meal component.
- Update in the Final Rule: Clarify that SFAs are authorized and encouraged to provide a non-dairy beverage that meets the USDA standards to any student with a special medical or dietary need whose parent or guardian makes a request.
- Update in the Final Rule: Clarify that plant-based diets can qualify as a special medical or dietary need, whether the diet is due to religious, cultural, physiological, philosophical, or other reasons.
- Update in the Final Rule: Clarify that lactose intolerance can be considered both a disability and a special medical or dietary need.
- Update in the Final Rule: Provide a model parental notice and form for milk substitution requests that SFAs can use on their websites and mail to families.
- Update in the Final Rule: Allow additional healthcare professionals to write a note to support meal modifications that do not meet the meal pattern requirements.
- Update in the Final Rule: Amend regulations and policy memoranda for all school meal programs other than the NSLP such that disability-related substitutions must be made available upon request of a parent or legal guardian.

**Section 6: Menu Planning Options for American Indian and Alaska Native Students**
- Maintain in the Final Rule: Expand the option to serve vegetables to meet the grains component to include the Child and Adult Care Food Program and Summer Food Service Program.
- Maintain in the Final Rule: Expand the option to serve vegetables to meet the grains component to include all schools.
- Update in the Final Rule: Expand the option to serve vegetables to meet the grains component to include schools primarily serving Native Samoan, Puerto Rican, Virgin Islander, Guamanian, and Hawaiian – as well as other populations including African Americans, Asian Americans, and Latin Americans who use starchy vegetables as grains – children living in the mainland U.S.
- Update in the Final Rule: Expand the list of allowable vegetables to substitute for grains to include squash, cassava (yuca), and taro, in addition to USDA’s proposal to add prairie turnips.
- Update in the Final Rule: Require vegetables allowed to be substituted for the grains component to be prepared in ways that align with traditional cultural preparations.

**Section 7: Traditional Foods**
- Maintain in the Final Rule: Explicitly state in regulation that traditional foods may be served in reimbursable school meals.
→ Maintain in the Final Rule: Commit to supporting efforts to incorporate traditional foods into school meals, including by addressing barriers to doing so.

→ Update in the Final Rule: Consider and support additional populations for whom standard school meals are not reflective of their traditions and cultures.

Section 14: Geographic Preference

→ Update in the Final Rule: Clarify that a bid specification for “foods produced by an historically underserved, socially disadvantaged, or limited resource farmer or producer” is allowable.

Section 15: Miscellaneous Changes

→ Update in the Final Rule: Encourage schools to offer daily plant-based options beyond a nut butter sandwich.

e. Local Economies

The federal government can create more diversified and resilient supply chains by supporting local and regional food systems. Strengthening support for locally-owned, small and mid-sized agricultural and local food processing operations will both create more robust regional economies and promote stability and security in the food supply.

As USDA’s Agricultural Marketing Service explains, “The consumer demand for locally-produced food is creating jobs and opportunity throughout rural America for farms, businesses and entrepreneurs that store, process, market and distribute food locally and regionally.”30 CNP operators have the right to specifically source from farmers, producers, and vendors in their own communities. This change will shift social power – defined as “communal self-determination”31 – to program operators. To best support CNP operators to support their local economies in the Final Rule, USDA must:

Section 13: Buy American

→ Maintain in the Final Rule: Establish a 5 percent ceiling on the non-domestic commercial foods a school food authority may purchase per school year, which is vital to maximizing the impact of domestic purchasing with public dollars on our nation’s food and farm economy.

Section 14: Geographic Preference

→ Maintain in the Final Rule: Allow “locally grown, raised, or caught” to be used as procurement specifications for unprocessed or minimally processed food items.

Since 2011, child nutrition regulations have allowed for a “geographic preference” but do not adequately address the legislative intent: to allow “local” to be used as a bid specification, which is a written description of the product or service that the vendor must meet to be considered responsive and responsible. Currently, bidders located in a specified geographic area can be provided additional points or credit calculated during the evaluation of the proposals or bids received in response to a solicitation.32 The Proposed Rule allows “locally grown, raised, or caught” to be used as procurement specifications for unprocessed or minimally processed food items, which makes it easier for CNP operators to purchase local foods. We support this proposed change and look forward to seeing it maintained in the Final Rule.

f. Animal Welfare

Humane treatment of animals in food production is a key part of a respectful, relational – not extractive – food system. Inhumane conditions in meat and poultry production are intertwined with the corporate consolidation of our food system, and the prioritization of cheaply produced meat at the expense of animal welfare, worker safety, farmer livelihoods, and community health. Additionally, prioritizing suppliers who practice judicious use of antibiotics in livestock production will safeguard human health as well as animal health.

Many Americans – including young people – are concerned about animal welfare, and USDA has a responsibility to help program operators meet this demand for more humane options. According to a 2022 survey conducted by the ASPCA, 44 percent of respondents reported that concern for farm animal welfare motivated them to reduce their animal product consumption.33 In that same survey, “89 percent of Americans are concerned about industrial animal agriculture, citing animal welfare, worker safety, public health risks or the environment as a concern.” Farms that provide healthy and humane conditions for farmed animals also employ regenerative animal husbandry practices with conservation benefits and potentially reduce worker exposure to the harmful working conditions often found in industrial animal production.

To meet student and program operator demand for more humanely raised animal products, FNS should:

Section 14: Geographic Preference

→ Update in the Final Rule: Allow CNP operators to include as a bid specification “animal products from a producer that participates in a third-party animal welfare certification program recognized by the USDA.”

IV. Finalizing the Meal Patterns and Ensuring Successful Implementation

32 7 CFR 210.21(g) and 220.16(f)
33 ASPCA. Public Opinion Surveys on Farm Animal Welfare. https://www.aspca.org/protecting-farm-animals/aspca-surveys
Fostering values-aligned procurement in the Final Rule is necessary to ensure successful implementation of the updated meal patterns. Our priorities – some of which maintain and others of which update the Proposed Rule – will advance USDA’s priorities and core values by supporting the DGA, ensuring evidence-based nutrition, protecting our planet, and advancing equity.

Additionally, across all of the changes made to the meal patterns, we urge USDA to do everything possible to best support the Child Nutrition Program professionals leading implementation of the changes. Doing so will look like USDA providing program operators with comprehensive training and technical assistance and streamlining the regulations across the myriad programs wherever possible. In combination, these steps will foster successful implementation of the changes. CNP professionals will be able to invest less of their time in navigating needed menu planning differences across various programs and more time into achieving the new standards, all with support from USDA.

V. Looking Ahead

Again, DC Greens would like to express appreciation to USDA for its efforts to comprehensively update Child Nutrition Program meal patterns to best align with the Dietary Guidelines for Americans. We applaud the proposed updates that will better nourish our children – who are our future – and better support CNP culinary professionals – who are our superheroes making this all possible.

There are many factors that could – and in some cases, already do – disrupt or compromise our food and agricultural supply chains, including climate change, environmental and ecosystem degradation, corporate consolidation, and risks to the health and well-being of food system workers. Its own food procurement is one of the federal government’s most direct points of leverage to spur the resilient, just, and nourishing food system that we need to weather these threats. We urge USDA to lead the way in implementing bold and innovative values-driven food procurement policies to ensure the Administration “walks the walk” towards its laudable goals to fight climate change, ensure nutrition security, and achieve racial justice. Actions speak louder than words.

All of this being said, we acknowledge that disrupting the status quo – including longstanding systems of injustice – is not an overnight process. Thus, it is imperative that USDA invest in supporting all aspects of the food chain – from production to aggregation, processing, and distribution – in meeting demand for values-aligned foods via the Final Rule for CNP meal patterns, as well as through other USDA rules and regulations. Additionally, operationalizing these values will be bolstered through collaboration with the non-governmental organizations and academic institutions already pursuing child nutrition programs aligned with the DGA – as well as equitable and resilient supply chains – via values-aligned purchasing. DC Greens is ready and able to contribute to our goals – which we share with USDA – to maximize the impact
of the updated regulations on alignment with the DGA, child nutrition, our environment, our economy, and equity and inclusion. The well-being of not only children and CNP operators but also farmers, producers, distributors, vendors, suppliers, and workers across the food chain must be accounted for in the Final Rule. USDA must center its full mission, vision, and core values so that all people are respected, valued, and included and thus will thrive.

With gratitude and in partnership,

Lea Howe
Director of Institutional Food Initiatives
DC Greens