March 25, 2026

The Honorable Brooke L. Rollins
Secretary
United States Department of Agriculture
1400 Independence Ave. SW
Washington, DC 20250

Dear Secretary Rollins and U.S. Department of Agriculture FNS Leaders,

We, the undersigned school foodservice professionals, school districts, medical professionals, educators, industry groups, companies, and non-profit organizations, respectfully urge the USDA to establish a plant protein subgroup within the Meats/Meat Alternates (M/MA) category in the National School Lunch and Breakfast Programs as the meal patterns are updated to align with the 2025–2030 Dietary Guidelines for Americans (DGA).

Current Meal Patterns Do Not Ensure Protein Variety

The Dietary Guidelines for Americans, including those released in January, have long recommended diversifying protein intake across plant and animal sources.[i] Yet in practice, school menus remain heavily dominated by animal-based proteins. A forthcoming analysis of a sample of 45 school district menus from November 2025 found that, excluding nut butter and jelly sandwiches, fewer than one in ten school lunch entrée offerings utilized plant-sourced protein to fulfill the M/MA requirement.[ii] More than 90% of school lunch entrees contained animal-sourced proteins.

While many plant proteins are creditable within the M/MA category, there is no structural mechanism within the meal pattern to ensure that plant proteins are offered with regularity. As a result, many schools default to readily available, historically subsidized animal products. This undermines the DGA's call for dietary patterns that balance and diversify protein sources.

USDA has already recognized the importance of variety in the vegetable group. The vegetable subgroup requirement exists precisely to prevent menus from rotating through the same limited offerings and to ensure students are exposed to a variety of foods and the nutrients they contain. This is critical as eating habits and preferences are established early in life.

A similar approach is warranted within the M/MA category. Establishing a minimum weekly requirement for plant-based protein offerings would operationalize the DGA's protein diversification guidance, expose students to a greater variety of healthy protein offerings, and ensure that plant proteins are meaningfully incorporated into school meals nationwide.

Increasing Plant Proteins Supports Fiber Intake and Gut Health

Dietary fiber remains a nutrient of public health concern, with more than 95 percent of school-age children failing to meet recommended intake levels.[iii] USDA's own research found that National School Lunch Program participants consume ~6 grams of fiber at lunch on average, which is insufficient to meet daily Adequate Intake levels of 25-38 grams per day, depending on age and sex.[iv]

Plant proteins—particularly beans, lentils, peas, and soy foods—are among the most concentrated and scalable sources of fiber within the meal pattern.[v] These foods provide fermentable fibers that nourish beneficial gut bacteria and support the development of a healthy gut microbiome.[vi] A growing body of research links a diverse and fiber-rich microbiome to improved digestive health, immune function, metabolic regulation, and even mental well-being. [vii] Diversifying protein intake to include sufficient plant sources also supports consumption of magnesium and potassium, which are underconsumed in children, as well as phytonutrients and prebiotic compounds absent in animal proteins.[viii]

Without structural incentives to serve plant proteins regularly, school menus have not achieved sufficient fiber intake for students. A plant protein subgroup within M/MA would help ensure that fiber-rich plant protein sources are consistently incorporated into menus, strengthening alignment with the DGA.

A Plant Protein Subgroup Advances Inclusivity and Student Meal Access

Offering more plant-sourced proteins will also help school meals meet the needs of more students, including:

- Students following vegetarian or vegan diets
- Students observing many different religious dietary practices, including halal and kosher traditions
- Students who are lactose intolerant or have dairy allergies

Establishing a plant protein subgroup would help normalize these options, reduce stigma around special dietary requests, and ensure that all students have access to meals that meet their needs.

Operational Feasibility and Menu Flexibility

Creating a plant protein subgroup need not prescribe specific recipes or eliminate operator flexibility. Similar to the vegetable subgroups, USDA could establish a minimum weekly offering requirement while preserving local control over menu planning and day-to-day menu planning flexibilities.

Just as vegetable subgroups ensure variety and nutritional adequacy, a plant protein subgroup within the Meats/Meat Alternates category would provide a clear, practical framework to diversify protein intake, increase fiber consumption, and improve inclusivity within child nutrition programs.

We appreciate USDA's continued leadership and stand ready to support implementation efforts that strengthen school meals.

Respectfully,

Acterra: Action for A Healthy Planet
Alena's Lab Kitchen (California)
American Society for Nutrition
Animal Alliance Network
Association of State Public Health Nutritionists
Balanced, Inc.
Bebe Bitez
Black Veg Society
Calman Farms (New York)
Cascadia Produce
Center for Biological Diversity
Center for Environmental Health
Chicopee Public Schools (Massachusetts)
Chilis on Wheels
Christian Animal Rights Association
Climate Diet
Coalition for Healthy School Food
DC Voters for Animals
David Christensen Farm (New York)
Don Lee Farms
Durango District 9-R (Colorado)
DuPage Dietitian
Eating Well With Janel
Echo Crest Farms (New York)
EmpowerMe Diabetes Health
Farm Sanctuary
Feeding Georgia Families
Food 4 Thought Innovations
Food Empowerment Project
Food Revolution Network
Food Shift
Food Studies Institute
Food4Thought Innovations
Free from Harm
Fresh Med NYC
Friends of the Earth
Galt Joint Union Elementary School District (California)
Garden of Eva
Good Food Institute
Greenlyfe Nutrition
Heal With Doc Madz
Healthy Kids Happy Planet
Inland Empire Foods, Inc.
Ithaca Soy
Jewish Vegan Life
John R. Wallace Farms (New York)
Johns Hopkins Center for a Livable Future
Kayfoods
KC Farm School (Kansas)
Lexington School District (Massachusetts)
Liberate In Mind
Life Focus Nutrition Centers
Lotus Lifestyle Medicine
Luv Box LLC
Mercy For Animals
Morning Glory Garden (New York)
Mothers Out Front
National Farm to School Network
Nature's Dietician®

New Roots
New Roots Institute
New West Charter School (California)
New Hampshire Animal Rights League
Nourish Colorado
Nourished
NW Indiana Food Council
New Yorkers for Clean, Livable, and Safe Streets
New York State Dry Bean Association
Oregon Farm to School Network
Oregon School-Based Health Alliance
Pasado's Safe Haven (Washington)
Physicians Against Red Meat
Physicians Committee for Responsible Medicine
Pinnacle Prevention (Arizona)
Plant Based Support
Plant Based Treaty
Plant-Based Juniors
Plantrician Project
PURIS
Purely Planted
Residents Allied for the Future of Tioga (New York)
Real Food for Kids
Rouxbe Global Food Group
Russo/McEntee Academy (California)
SanDiego350 (California)
Santa Cruz Climate Action Network (California)
Strategic Action For Animals
Switch4Good
Tamalpais Union High School District (California)
Texas Veg Foundation
The Changemaker Project
The Humane League
Trenton Special School District (Tennessee)
Tribal Health of the Confederated Salish and Kootenai Tribes (Montana)
tUrn Climate Crisis Awareness & Action
Veg Society of DC
VegMichigan
Voters For Animal Rights (New York)
Walnut Creek School District (California)
Webster Public Schools (Massachusetts)
West Harlem Group Assistance Inc. (New York)
Wholesome Minnesota
Woody Acres Farm, LLC (New York)
YES Charter Academy (California)

Alexandra Natiss, Registered Nurse (Florida)
Alexis Miller, Teacher (Colorado)
Andrea Cullers, Professor (Missouri)
Andrea Otto, National Board Certified Health and Wellness Coach (Colorado)
Anika Evers, School Audiologist (North Carolina)
Angela Gomez, Nutrition & Wellness Supervisor (Arizona)
Amy Harrington, Dietetic Intern (Missouri)
Autumn Martin, Registered Dietitian (Georgia)
Ben Guyton, Director of Student Nutrition Services (California)
Blake Lineweaver, Local Food Promotion Program Manager (Montana)
Brianna Jackson, Farm to School Coordinator (Massachusetts)
Cayla Casciani, Garden Coordinator (New York)
Chelsea Kleinmeyer, Public Health Division Director (Montana)

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Crystal Tunstall, Educator (Michigan)
Darlene Phillips, Bean Processor (New York)
David L. Christensen, Bean Farmer (New York)
David Woodward, Chairman, NYS Dry Bean Association and Owner, Woody's Acres Farm (New York)
Deborah Milkowski, Physician (North Carolina)
Deepa Deshmukh, Dietitian, Certified Diabetes Care Education Specialist (Illinois)
Diane Smith, Educator (Washington)
Emeric Bisbee, Principal (California)
Fany Williams, Foodservice Director (California)
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Hannah Smith, School Health Analyst (Oregon)
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Janette Mejia, Educator (Florida)
Jill Edwards, Director of Education (Florida)
John Blowers, Bean Grower and Processor (New York)
John Wallace, Bean Grower (New York)
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Kellene Isom, Associate Professor (California)
Kelly Combs, School Nutrition Programs Coordinator (Virginia)
Kelsey Sanders, Food Service Director (Massachusetts)
Kevin Silvia, Resident District Manager (Massachusetts)
Keyur Thakar, Physician (New York)
Kimberly Dao, Family Physician/PCP (Florida)
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Kym Bower, Food Service Innovation Specialist (California)
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Lucy Hicks, School Nutrition and School Finance Consultant (California)
Madhuri Pydisetty, Lifestyle Medicine Physician (Illinois)
Mary Bonsall, Culinary Program Manager (Virginia)
Neel Gonugunta, Plant Powered Youth Fellow (Wisconsin)
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Sheila Rolfer, Farm to School Procurement Coordinator (California)
Shoba Balaji, Dietitian (Florida)

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Susan Silverman, Project Technical Specialist (Arizona)
Suzy Sayre, Director of Nutrition Services (California)
Tabasum Amir, Physician (Florida)
Truddie Reif, Registered Dietitian (Florida)
Whitney Tabaie, Registered Dietitian (California)

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[i] Department of Health and Human Services and United States Department of Agriculture. Dietary Guidelines for Americans. (2026). https://cdn.realfood.gov/DGA.pdf
[ii] Data available upon request from Friends of the Earth.
[iii] US Department of Agriculture; Agricultural Research Service. What We Eat in America: Nutrient intakes from food by gender and age. National Health and Nutrition Examination Survey (NHANES) 2009-10. http://www.ars.usda.gov/Sp2userfiles/Place/12355000/Pdf/0910/Table_1_Nin_Gen_09.Pdf
[iv] Fox, M. K., & Gearan, E. (2019). School Nutrition and Meal Cost Study: Student Participation, Satisfaction, Plate Waste, and Dietary Intakes. U.S. Department of Agriculture, Food and Nutrition Service. https://fns-prod.azureedge.us/sites/default/files/resource-files/SNMCS-Volume4.pdf)
[v] Mayo Clinic. (2025). Chart of high-fiber foods. https://www.mayoclinic.org/healthy-lifestyle/nutrition-and-healthy-eating/in-depth/high-fiber-foods/art-20050948 (Pulled from the USDA National Nutrient Database for Standard Reference, Legacy Release)
[vi] Marinangeli CPF, Harding SV, Zafron M, Rideout TC. A systematic review of the effect of dietary pulses on microbial populations inhabiting the human gut. Benef Microbes. 2020 Sep 1;11(5):457-468. doi: 10.3920/BM2020.0028. Epub 2020 Aug 31. PMID: 32865026.
[vii] Biscarrat, P., Bedu-Ferrari, C., Langella, P., & Cherbuy, C. (2024). Pulses: A way to encourage sustainable fiber consumption. Trends in Food Science & Technology, 143, 104281. https://doi.org/10.1016/j.tifs.2023.104281
[viii] Bailey, Ariana D. L., et al. “Usual Nutrient Intake Adequacy and Nutritional Status of United States Children and Adolescents: National Health and Nutrition Examination Survey 2001–March 2020.” The Journal of Nutrition, vol. 156, no. 3, Mar. 2026, article 101377. Elsevier, https://doi.org/10.1016/j.tjnut.2026.101377