

March 30, 2026

The Honorable Brooke L. Rollins
Secretary
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Dear Secretary Rollins and Food and Nutrition Service Leaders,

Re: Aligning School Meal Standards with the MAHA Mandate to Protect Children's Health

We write as child nutrition advocates, parents, and organizations committed to the shared goal of ending chronic disease through good nutrition and healthier food production. The Make America Healthy Again mandate has elevated the urgent need to address rising rates of childhood obesity, metabolic dysfunction, early cardiovascular risk, and diet-related illness. School meals are one of the most powerful tools available to advance prevention-first public health policy. The nutrition standards set by USDA today will shape the long-term health trajectories of millions of children.

As you have expressed in your public remarks as a MAHA mom, children's health must remain at the center of national food policy. The MAHA mandate recognizes that health outcomes are directly shaped by agricultural production and farm systems. How food is grown, raised, processed, and made available to families influences what children eat and their development and long-term wellbeing. School nutrition programs sit at the intersection of these priorities. We recommend a phased approach to supporting the health and wellbeing of our nation's children through child nutrition programs.

First, maintain the current Meat/Meat Alternate requirement while undertaking a comprehensive review of sourcing, production, and processing standards. Analyses of school meal programs have long shown that protein adequacy is not the nutritional gap facing children. The more urgent public health priority is increasing dietary fiber and overall food quality. In practice, the primary protein items served in schools are highly processed products such as hot dogs, chicken nuggets and other breaded chicken products, burgers, mozzarella sticks, pizza, and deli-style cold cuts, which are typically supplied through industrial production systems.

These processed animal products often contain additive heavy formulations, including preservatives such as nitrites and nitrates, which health authorities have associated with increased colorectal cancer risk in processed meats, as well as other processing agents such as sodium phosphates that raise broader nutritional concerns and kidney damage. A forthcoming analysis found that roughly one in five school lunch entrees contained processed meats linked to cancer.

Beyond the concerns with processed meat, majority of *all* animal proteins served in schools are sourced from industrial supply chains that rely on routine antibiotic use, growth-promoting drugs including ractopamine, and feed grown with significant pesticide inputs. Federal regulators have

approved hundreds of pharmaceutical products for use in food animal production across species, including antibiotics, antiparasitics, and growth promoters.

These exposures do not remain confined to the farm. Industrial production systems can contribute to cumulative exposure to environmental contaminants, including trace levels of dioxins, heavy metals such as mercury and cadmium, and pesticide residues that can accumulate through feed and production systems. These contaminants are ending up on children's lunch trays: A test of 43 school lunch samples commissioned by Moms Across America found that 93% of samples contained cancer-causing glyphosate, 9 samples included veterinary drugs and hormones, and 100% contained heavy metals. While each input may be individually regulated, their aggregate presence across industrial supply chains warrants careful review when shaping nutrition policy for children.

Increasing the current Meat/Meat Alternate requirement before strengthening sourcing standards, safety testing and kitchen preparation capacity would risk increasing reliance on lower cost industrial formulations rather than improving nutritional quality. Maintaining the current M/MA requirements would help school districts first focus on sourcing higher quality and safer animal and plant proteins.

Second, ensure that school meal standards prioritize adequate dietary fiber and overall nutrient balance. Children – including school meal participants and those who bring food from home – are deficient in fiber; fewer than 10% are meeting the fiber recommendations from the DGA. Fiber is found in plant foods such as fruits, vegetables, whole grains, legumes, nuts, and seeds. Adequate fiber intake plays a critical role in metabolic regulation, gut microbiome development, blood sugar stability, and long-term cardiovascular health.

Maintaining balanced meal patterns that emphasize fiber-rich foods like whole grains, fruits, vegetables, and pulses is therefore central to a prevention-first approach. The current child nutrition meal patterns do not include a fiber standard, which should be prioritized.

Third, strengthen guardrails around processing standards, routine pharmaceutical use, and additive profiles so that quality evolves alongside any future policy shifts. For example, USDA should focus on leveraging its own commodity procurement to encourage production systems that reduce routine pharmaceutical use, improve animal husbandry, and lower chemical input intensity, while expanding access to higher quality protein sources across diverse regional agricultural systems such as meat raised without hormones and routine antibiotics, grass-fed beef, and organic meat and dairy.

Children consume school meals five days a week throughout their developmental years. A prevention-first framework calls for reducing cumulative chemical exposure wherever feasible and prioritizing clean, minimally processed foods.

Fourth, expand farm to school procurement pathways and regional supply chain infrastructure. Strengthening farm to institutional models supports rural economies, increases transparency and local accountability, and enables schools to source higher quality ingredients consistent with long term public health goals. Targeted public investment will enable schools to procure higher quality foods from producers who are working to reduce routine pharmaceutical use

and chemical intensity, while providing farmers with predictable institutional markets. In doing so, federal child nutrition programs can simultaneously reduce chronic disease risk among children and strengthen agricultural resilience within rural communities.

Prioritizing support for farm to school initiatives and strengthening regional procurement pathways directly connects child health with farmer wellbeing at a critical time when both are under strain. Children are experiencing rising rates of chronic disease, while farmers face mounting economic pressure and consolidation within agricultural markets. When schools invest in higher quality, locally sourced food, they improve children's health while creating stable demand that strengthens farm viability. In this way, child health and farmer wellbeing are mutually reinforcing goals.

Finally, meaningful progress toward prevention-first nutrition requires renewed investment in school kitchen infrastructure and workforce capacity. Many districts lack the equipment, storage, and staffing necessary to prepare whole foods from scratch. Without targeted support to modernize kitchens and expand scratch cooking capacity, schools remain dependent on centrally manufactured products. Re-equipping school kitchens to prepare real food on site will allow districts to serve cleaner, whole food protein options alongside fresh fruits, vegetables, and whole grains.

Once sourcing standards, an adequate fiber standard, procurement infrastructure, and kitchen capacity are aligned with prevention-first principles, USDA can reassess whether adjustments to protein emphasis are warranted. Otherwise, USDA may unintentionally reinforce consolidation, reliance on highly processed animal products, and divert resources from higher priority goals like fresh and local food sourcing, scratch cooking, and nutritionally balanced menus.

Thank you for your consideration of these concerns and for your continued leadership in advancing policies that prioritize the health and long-term wellbeing of America's children. We stand ready to work with USDA to ensure that school nutrition programs fully reflect the shared goal of making America's children healthy again.

Sincerely,

American Grassfed, Carrie Balkcom, Executive Director

Alliance for Natural Health, Robert Verkerk, Executive & Scientific Director

American Regeneration, Ryland Engelhart, Co-Executive Director & Co-Founder

Children's Health Defense, Mary Holland, Chief Executive Director

Competitive Markets Action, Marty Irby, President & CEO

Farm Action, Angela Huffman, Co-Founder, President, & CEO

Farm and Ranch Freedom Alliance, Judith McGeary, Executive Director

Global Wellness Forum, Sayer Ji, Chairman & Co-Founder

Heartland Heritage Alliance, Elizabeth Kucinich, Founder

John Klar, livestock producer, author and MAHA ag policy advisor

Moms Across America, Zen Honeycutt, Founding Executive Director

United We Eat, David Murphy, Founder

Weston A. Price Foundation, Sally Fallon Morell, President

CC:

The Honorable Robert F. Kennedy Jr., Secretary of Health and Human Services

Patrick Penn, Deputy Under Secretary of Food, Nutrition, and Consumer Services

Shiela Corley, Chief of Staff, Food and Nutrition Service

Jennifer Tiller, Chief of Staff to the Deputy Secretary and Senior Advisor to the Secretary for Food, Nutrition and Consumer Services

Eve Stoodly, Director, Nutrition Guidance and Analysis Division

Jessica Saracino, Director, Child Nutrition Programs, Program Monitoring and Operational Support Division

Tina Namian, Deputy Associate Administrator, Child Nutrition Programs

E. Matthew Myers II, Director, External and Intergovernmental Affairs