SCHOOL NUTRITION ASSOCIATION

Feeding Bodies. Fueling Minds.™

September 08, 2025

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Dear All:

On behalf of the School Nutrition Association (SNA), which represents 50,000 school nutrition professionals nationwide, we appreciate the opportunity to provide input to the Department of Health and Human Services (HHS) and the United States Department of Agriculture (USDA) regarding the development of a uniform definition for ultra-processed foods (UPFs).

I. Introduction

Under the Richard B. Russell National School Lunch Act, nutrition standards for school meals must align with the goals of the most recent Dietary Guidelines for Americans (DGAs). SNA anticipates that the upcoming 2025 DGAs will recommend reducing the consumption of UPFs in American dietary patterns, as recommended by the Make America Healthy Again (MAHA) Commission. As such, any definition of UPFs adopted at the federal level will likely influence future revisions to school meal standards, making it essential that the definition be both scientifically sound and operationally feasible.

Since passage of the Healthy, Hunger-Free Kids Act (HHFKA), school nutrition professionals have dramatically increased the amount of whole foods offered to students, including fresh fruits and vegetables, whole grains and milk. Simultaneously, they have substantially improved the nutrient profile of school meal offerings by both expanding scratch preparation and partnering with suppliers to reduce sodium, calories and added sugar in pre-prepared menu options. Thanks to these efforts, school meals are proven[1] to be the healthiest meals Americans eat.

School nutrition professionals are committed to building on this success; however, schools simply lack the staff, equipment, infrastructure, time and critical funding to scratch prepare all menu options for students. Any federal restrictions on UPFs that affect school nutrition standards must consider these limitations and ensure that schools are permitted to serve nutrient-dense, pre-prepared foods. In addition, school meal programs require additional funding to successfully implement further menu changes.

II. Member Input

To inform these comments, feedback from our membership was collected through a rapid response SNA Pulse Poll and listening sessions conducted with multiple SNA committees and councils. More than 2,000 members[2] responded to the poll, including meal program operators (92.9% of respondents), industry (4.4%), and state agency staff (2.7%). Poll findings, cited throughout these comments, indicate that an overwhelming majority of members believe considerations such as nutrient density and food safety must be taken into account when developing a definition for UPFs. Further, the data and feedback underscore how imperative increased funding will be to help schools implement a reduction in the amount of UPFs in school meals.

III. Consistency Across Programs

A consistent, science-based federal definition of UPFs is essential for guiding school nutrition standards and ensuring clarity across child nutrition programs. Currently, varying definitions enacted and proposed in state legislation are

[1] https://now.tufts.edu/2021/04/12/study-finds-americans-eat-food-mostly-poor-nutritional-quality-except-school

[2] A total of 2,296 members completed at least one question of the poll. 2,174 members completed all questions on the poll.

creating confusion and potential challenges for meal program operators, state agencies, and industry partners. Rather than researching and developing a multitude of new recipes to meet a patchwork of differing state regulations, manufacturers may decide to exit the K-12 market altogether, further threatening schools' access to foods that meet nutrition standards. Establishing a federal definition would avoid this unintended consequence, promote equity across states, and streamline compliance, procurement, training, and professional development.

Some state laws, such as those proposed in Pennsylvania and California, aim to ban certain food additives commonly found in processed foods, including stabilizers, thickeners, coloring agents, and flavoring agents. While these proposals are often driven by concerns about health and nutrition, they raise important questions about food safety, cost, and product availability - especially for school meal programs that rely on a consistent supply of compliant foods.

Decisions regarding food ingredients and processing must be grounded in sound science and aligned with consistent national standards. Additionally, consideration should be given to how current food databases and labeling technologies could support the identification of UPFs in a way that aligns with existing labeling laws and supports operational feasibility in school nutrition programs across all states.

IV. Challenges with Existing Classification Systems

There are a handful of well-known classification systems used to categorize processed foods, each varying in complexity and criteria. The Nova system is the most widely used in research and public health discussions; however, it classifies all UPFs uniformly, without accounting for their nutrient density.

For instance, a nutrient-dense item like hummus that contains a stabilizer to maintain texture is treated the same as a cupcake, despite their vastly different nutritional profiles. This is both confusing for consumers and runs counter to the goals of the DGAs. In a study published[3] in 2023, USDA demonstrated that it is possible to create an entire nutrient-dense meal pattern with a high Healthy Eating Index (HEI) score using foods classified as UPFs under Nova.

Nova's broad UPF category also presents critical challenges for school nutrition programs. According to the pulse poll, 62.0% of members reported that if schools

[3] https://www.sciencedirect.com/science/article/pii/S0022316623724346?via%3Dihub

were expected to limit UPFs using the Nova scale, there would be a “significant” reduction in the number of menu items available to students, without consideration for the nutrient density of these foods.

For example, school kitchens that lack adequate staffing and equipment to prepare and roll burritos from scratch may obtain nutrient-dense pre-prepared alternatives, made with low-sodium beans, low-fat cheese and whole grain tortillas. These processed specialty menu options have a far better nutrient profile than typical commercial and retail versions - any classification system should account for those differences. One listening session participant suggested creating a continuum:

> “I think of this as a global malnutrition composite score—something that exists on a continuum. We should develop assessment criteria that allow for scoring foods along this spectrum, with a defined cutoff point to indicate whether a product qualifies as ultra-processed. For example, nutrient-dense items like commercially manufactured whole grain bread should not be automatically classified as ultra-processed. A continuum scoring system would offer more precision and flexibility, whereas rigid categorical definitions could lead to unnecessarily banning beneficial foods.”

Food manufacturers noted that many current manufacturing techniques, such as rinsing and draining processes that reduce sodium and fat content, actually improve nutritional profiles but could be penalized under current classification systems. Such oversimplification could lead to unintended consequences in school meal planning and policy. Poll participants overwhelmingly agreed (98.9%) that nutrient density was very or moderately important as a consideration in the definition of UPFs.

SNA does not recommend adopting any existing classification system without modification. Instead, **a new federal definition of UPFs should incorporate nutrient density as a key factor to ensure that healthful, culturally relevant, and practical foods are not unnecessarily excluded from federal nutrition programs** that are based on the DGAs and consensus science.

V. Consideration of Processing Levels

Processing methods such as cutting, partial cooking, and packaging play a vital role in enhancing food safety and supporting the various operational needs of school meal programs. These techniques can help address common challenges such as limited kitchen equipment, staffing shortages, and time constraints,

making it feasible for schools to prepare and serve nutritious meals efficiently. Importantly, foods that undergo these types of processing should not be automatically disqualified from school menus simply because they are processed. Restricting common preservation methods could increase food waste - for example, eliminating ascorbic acid treatment of sliced apples would significantly reduce shelf life and increase waste. When these methods contribute to safe, appealing, and nutritionally balanced meals, they support the goals of the Dietary Guidelines for Americans and the broader mission of child nutrition programs.

Nearly all poll participants (98.2%) indicated that food safety should be a consideration in the development of a federal definition of UPFs and 97.6% of respondents rated market availability of alternative menu items as an important consideration. Additionally, 97.0% emphasized schools' limited capacity for scratch preparation. These findings underscore that the processing methods that schools depend on to serve nutritious meals within operational constraints should not be automatically restricted. A listening session participant discussed reliance on freezing to preserve food:

> "Freezing is a way to preserve food. It stops spoilage and slows down chemical changes. Modern freezing methods used in food facilities keep fruits and vegetables fresh and nutritious—often better than home freezing or long-term refrigeration."

Any definition of ultra-processed foods must carefully distinguish between necessary and beneficial forms of processing and those that may compromise nutritional quality, to avoid unintended barriers to serving healthy meals in schools.

VI. Alternative Names

During listening sessions, participants were asked to reflect on whether UPFs is the most appropriate terminology for guiding policy and public understanding. Many expressed concern that the term may oversimplify the issue, focusing too heavily on processing methods rather than the actual ingredients or nutritional value of the food. Instead, participants emphasized that consumer interest and scientific inquiry are more aligned with ingredient transparency, clean labeling, and the overall quality of the food.

> "I think of the ingredient-based approach like the Whole Foods 'No List.' It's a familiar way for informed consumers to feel confident about what they're eating. It's clearer and aligns better with the idea of a clean label."

"The number of ingredients should have no bearing on whether it is ultra-processed. I think people are more worried if any of the ingredients are harmful."

"We need to distinguish between protein-rich main entrées and low-nutrient processed foods. Lumping them together under UPF doesn't reflect their nutritional differences. We need to look at ingredients."

VII. Practical Applications and Implementation Needs

SNA recommends the formation of an advisory committee to evaluate how a definition of UPFs would apply within the context of school meal programs. Clear and consistent guidance is essential to help schools identify UPFs, whether through labeling requirements, staff education, training protocols, or updates to federal and state policies. Any implementation strategy must be practical and achievable for school nutrition professionals, who already operate under significant constraints related to staffing, budgets, and procurement and must include a full, thorough rule making process. Moreover, if a new UPF definition or updates to the Dietary Guidelines for Americans result in rule making and changes to school meal standards, a substantial increased investment in school nutrition programs will be necessary to support successful implementation. This includes funding for training, equipment, and access to compliant food products that meet both nutritional goals and operational realities.

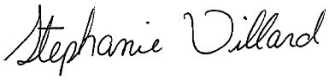
In SNA's poll, members overwhelmingly indicated a need for funding to successfully reduce the amount of UPFs in school meals. Respondents cited a need for increased funds for labor (99.0%), food (98.8%), equipment and infrastructure (98.4%), and staff training (97.7%). Additionally, 99.0% indicated a need for sufficient time for schools to obtain alternative menu items, train staff, and test with students.

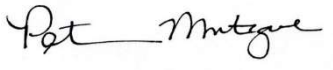
Stakeholders consistently emphasized that meaningful implementation would require years, not months. Schools are still adapting to nutrition standards established over a decade ago under the HHFKA. Any rule making associated with the adoption of this new definition must include a phased implementation approach with adequate time for menu planning, procurement adjustments, staff training, and infrastructure upgrades.

VIII. Conclusion

As USDA and HHS consider adopting a federal definition of UPFs, it is critical that this definition be grounded in sound science, reflect practical realities, and support the mission of child nutrition programs. School meal programs have made tremendous strides in improving the nutritional quality of meals. If a definition is adopted, thoughtful rulemaking will be essential to ensure that implementation within school meal programs is feasible, equitable, and aligned with the operational constraints schools face. With adequate funding, time, and guidance, schools can continue to be leaders in promoting healthy eating habits for America's children.

Sincerely,





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