October 23, 2025

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Meadow Platt
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Dr. Eve Stoody
Food and Nutrition Service
United States Department of Agriculture
1320 Braddock Place
Alexandria, VA 22314

Re: Comment on Ultra-Processed Foods Request for Information (Docket No. FDA-2025-N-1793)

Dear Dr. Kavanaugh, Counsel Platt, and Dr. Stoody,

Thank you for the opportunity to comment on the U.S. Department of Agriculture (USDA), Department of Health and Human Services (HHS), and Food and Drug Administration's (FDA) efforts to define ultra-processed foods (UPFs).

The Chef Ann Foundation is a national nonprofit dedicated to promoting whole-ingredient, scratch-cooked meals in schools. Scratch cooking enables schools to serve the healthiest, tastiest meals so students are well-nourished and ready to learn.

Our mission is to ensure that school food professionals have the resources, funding, and support they need to provide fresh, healthy, delicious, cooked from scratch meals that support the health of children and our planet. Scratch cooking with fresh, whole ingredients in schools is a vehicle to achieving many different goals on our path forward to healthier communities, including the reduction of UPFs in schools. For more than 15 years, our organization has partnered with school districts across the country to help them transition from highly processed, pre-packaged school meals to fresh, whole, scratch-cooked food. Our work now reaches more than 16,000 school districts and 4.4 million children nationwide, giving us the unique perspective on both the challenges and opportunities related to reducing ultra-processed foods in school meals.

Background on UPFs

There is a growing body of evidence that links consumption of UPFs to significant negative health outcomes, particularly for American youth. Research shows that high UPF consumption is associated with many diet-related chronic diseases, metabolic syndrome, and cardiovascular disease (Crimarco et al., 2022), as well as poorer cognitive performance and academic outcomes (Nguyen et al., 2025; Lopez-Gil, 2025). UPFs are often energy dense but nutrient-poor (Martini et al., 2021), displacing healthier, whole foods and contributing to nutrient deficiencies and poor diet among children.

Despite a slight decline in recent years, UPFs still represent roughly six out of ten foods consumed by children ages 18 and younger, over 10 percentage points higher than adults (CDC, 2025). These statistics underscore the urgent need for policy, practice, and research aimed at reducing UPF

consumption among children, particularly in schools where meals play such a critical role in their daily nutrition.

The Need for a Standardized Definition

CAF strongly supports USDA, FDA and HHS's efforts to establish a standardized and comprehensive definition of UPFs. A clear definition is essential for measuring progress, guiding research, and informing policy solutions that reduce UPF consumption while improving diet quality. A standardized definition is also necessary in order to achieve the ambitious goals outlined by the Presidential Commission to Make America Healthy Again (MAHA). Without a standard definition, school food authorities face barriers to adopting new procurement and menu-planning strategies that prioritize fresh, whole, and minimally processed foods, while navigating a patchwork of state-level regulations around UPFs.

While imperfect, we support application of the NOVA classification system as the baseline for developing a standardized definition for UPFs. NOVA is based on robust scientific evidence (Monteiro et al., 2019) and is widely recognized as the global standard for measuring UPF consumption. However, we also acknowledge its limitations, particularly its omission of nutrient density (Louie 2025 and Hess et al 2023) and focus solely on processing level and inclusion of additives and other non-culinary ingredients. For school meals, this narrow lens is insufficient.

CAF supports the development of an expanded definition that considers nutrient density, aligned with the Dietary Guidelines for Americans (DGAs), and acceptable forms for processing necessary for food safety and preservation.

To achieve this, we recommend forming a federal scientific advisory committee to review the latest evidence, compare alternative classification systems, and ensure alignment with broader public health goals.

The School Food Context

School meals are one of the most powerful levers for improving child nutrition and reducing UPF consumption because they are highly regulated and reach millions of children daily. For instance, Louisiana's recent passage of SB 14 is a strong example of state intervention around the prevalence of UPFs in school meals. This bill requires food products to disclose over 40 specified ingredients and bans more than 15 of them from school meals. By targeting the school meal environment first, the state is leveraging one of the most structured and impactful food systems available to influence children's diets, create healthier eating habits, and ultimately shift demand toward fresh, minimally processed foods across the broader food system. Louisiana is one of many states taking steps forward to reduce UPFs in schools and across the food system at large.

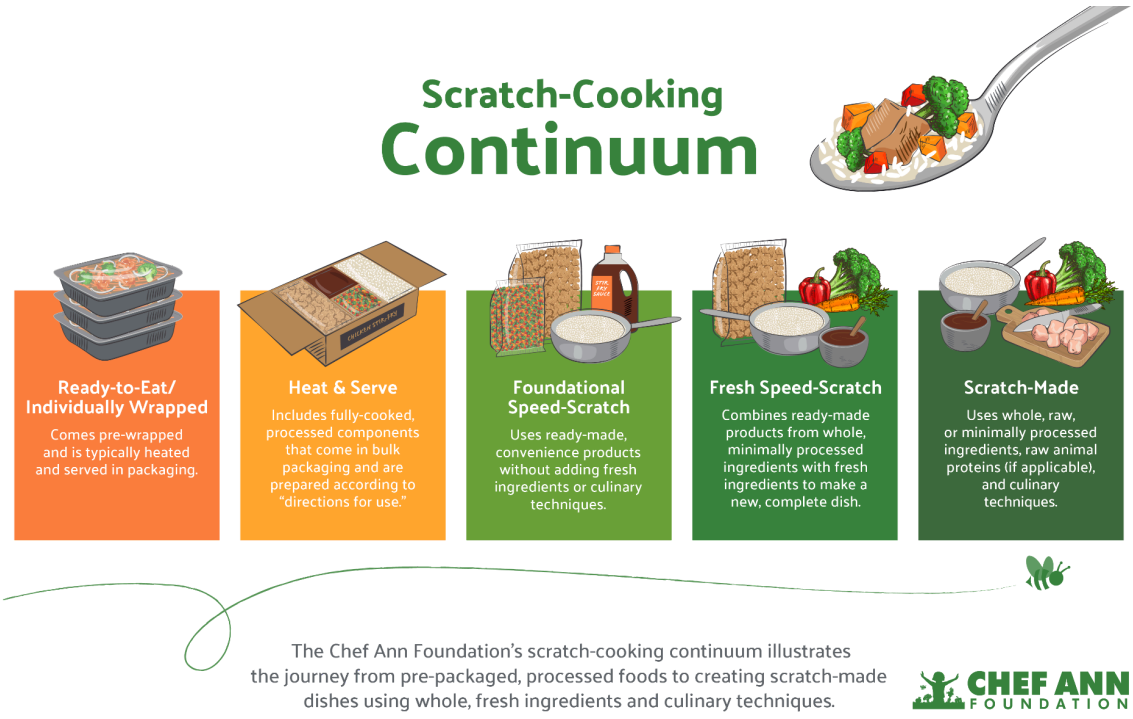
However, there is still limited research on the prevalence of UPFs in school meals often due to challenges with ingredient labeling and data accessibility. Existing studies suggest that about one-quarter of school food authorities serve heat-and-serve items daily (Cohen et al., 2025), which are typically characterized by high levels of processing and low nutrient density.

Despite these challenges, there is a growing number of school food authorities committed to scratch cooking in schools. A recent School Nutrition Association (SNA) trends report found that three-quarters of school food authorities now incorporate scratch-cooked entrées on a daily or at least once a week basis (SNA 2024). This progress demonstrates the willingness of districts to move toward healthier meals when they are supported with the right tools, training, and resources. Many school meal programs already meet or exceed nutrition guidelines in line with the DGAs and are the healthiest source of meals in the U.S. (Liu et al 2021).

CAF has seen firsthand that the most effective way to improve the quality of school meals, including limiting the reliance on UPFs, should focus on strategies aimed at improving their capacity to source and serve fresh, whole, minimally processed foods. This requires investments in kitchen infrastructure, professional development and adequate wages for school food professionals, and strengthening local and regional food supply chains.

CAF's Scratch Cooking Continuum

Given CAF's deep work in school districts nationally, we believe in the power of scratch cooking to support districts with reducing their reliance on UPFs and improving the overall quality of school meals. To help districts with making this transition, we educate and train school food professionals on the scratch-cooking continuum.



The stages of the continuum are listed below with the NOVA Classifications listed alongside to demonstrate the connection between scratch cooking and the reduction of ultra-processed foods. School districts that progress along this continuum significantly reduce their reliance on UPFs while building sustainable operations that can deliver nutritious meals in the long term.

Stages of Chef Ann Foundation's "Scratch Cooking Continuum"	NOVA Classification
Scratch Made: "Scratch Made" recipes are prepared using whole, raw, or minimally processed ingredients. These recipes follow culinary techniques using raw ingredients, including emphasis on raw animal proteins (if applicable).	**Group 1 - Unprocessed or Minimally Processed Foods**: Naturally occurring foods with no added salt, sugar, oils, or fats. Includes milk, meat, eggs, fish, poultry, plain unsweetened yogurt, beans, fresh, frozen, or dried fruits and vegetables, oats, grits, pasta, rice.
Fresh Speed Scratch: "Fresh Speed Scratch" recipes use "convenience," or ready-made products made from whole and minimally processed ingredients paired with fresh ingredients to make a complete dish.	**Group 2 - Processed Culinary Ingredients:** Food products from Group 1 that have been processed by pressing, refining, grinding and/or milling; they are used in home and restaurant kitchens to prepare, season and cook Group 1 foods. Includes vegetable oils, butter, vinegar. Salt, sugar and molasses from cane or beet, honey extracted from combs and syrup from maple trees.
Foundational Speed Scratch: "Foundational Speed Scratch" recipes use "convenience", or ready-made products made from whole or minimally processed ingredients, combined together to make a new complete dish. Foundational speed scratch does not add any fresh ingredients or additional culinary techniques. Foundational Speed Scratch covers a broad range of items that blend convenience foods and is often the first step toward more scratch cooking.	**Group 3** - **Processed Foods:** Food products made by adding sugar, oil and/or salt to create simple products from Group 1 foods with increased shelf life or enhanced taste. Includes canned vegetables, fruits, and beans; some salted or sugared nuts and seeds; salted, cured, or smoked meats; canned fish; fruits in syrup; cheese and freshly made bread.
Heat & Serve: A "Heat and Serve" recipe is made up of one or more fully-cooked components commonly described as "processed." Recipes are commonly generated from "directions for use" and nutrition labeling on the shipping container. Bulk items come packed loose in a case or bag and are not individually wrapped.	**Group 4 - Ultra-Processed Foods:** Industrially created food products created with the addition of multiple ingredients that may include some Group 2 ingredients as well as additives to enhance the taste and/or convenience of the product, such as hydrolyzed proteins, soy protein isolate, maltodextrin, high fructose corn syrup, stabilizers, flavor enhancers, non-sugar sweeteners, and processing aids such as stabilizers and bulking and anti-bulking agents. Includes commercially produced breads, rolls, cakes, cookies, donuts, breakfast cereals, soy burgers, flavored yogurts, ready-to-heat meals, such as frozen pizzas, soft drinks, and candy.
Ready to Eat/Individually Wrapped: These items are purchased wrapped and ready to serve. "Individually Wrapped" products typically contain at least a meat or meat alternate and grain component, and are heated and served in their packaging. Recipes are commonly generated from "directions for use" and nutrition labeling on the shipping container or do not require any manipulation prior to serving.	

Conclusion

By focusing on the end goal - more fresh, whole, and minimally processed foods served in schools - we seek to empower school districts to make changes that are sustainable (both financially and operationally) in the long term. This is an alternative to the current approach of restricting individual ingredients and processing methods, which limits the ability of districts to address the key barriers to improving school meal quality.

In summary, our recommendations include the following:

- Form a federal scientific advisory committee to review the latest evidence, compare alternative classification systems, and ensure alignment with broader public health goals.
- Include nutrient density in the ultra-processed foods standardized definition.
- Provide support for schools and other meal programs to transition toward scratch cooking using whole ingredients.

CAF urges USDA, FDA and HHS to adopt an expanded, standardized definition of UPFs that considers both processing level and nutrient density. This definition should be used to create evidence-based policies and funding programs that help schools build the capacity to serve more fresh, whole, and minimally processed meals. Doing so will not only reduce UPF consumption but also advance the ambitious goals outlined in the MAHA Strategy report, supporting healthier children and stronger communities.

Sincerely,

Mara Fleishman
Chief Executive Officer, Chef Ann Foundation