July 23, 2020

The Honorable Pamilyn Miller  
Administrator, Food and Nutrition Services  
U.S. Department of Agriculture  
1320 Braddock Place  
Alexandria, VA 22314

Dear Administrator Miller:

On behalf of United Fresh Produce Association, we wish to extend our gratitude to the Food and Nutrition Services staff for their tireless work during the COVID-19 pandemic to ensure that schools and the children they serve have the resources needed to serve school meals. Moving forward, we look forward to continuing this collaborative effort as everyone adapts what the 2020-2021 School Year may bring.

United Fresh Produce Association represents the full fresh produce supply chain, including growers, shippers, fresh-cut processors, wholesalers, distributors, retailers, industry suppliers, allied associations, and foodservice operators (including K-12). Since school closures began in March, school nutrition professional and fresh produce suppliers have collaborated to identify solutions to ensure that students continue to have access to a wide variety of fruit and vegetables. As the new school year begins with remaining uncertainty – two things are clear:

1) Schools must have the resources they need to serve students  
2) Meals must continue to prioritize nutrition standards that align with the Dietary Guidelines for Americans

As such, we encourage USDA to consider the following:

**Fresh Fruit and Vegetable Program Waivers should be extended through School Year 2020-2021**

Flexibilities and waivers issued by USDA earlier this spring allowed schools to continue to operate the Fresh Fruit and Vegetable Program (FFVP) during COVID closures by waiving previous requirements including the snack needing to be served in a congregate setting, during the school day, with a child present, and only a single serving. As a result, schools were able to provide innovative ways to serve fresh produce including multi-day servings and fresh produce packs. USDA guidance issued in April 2020 indicated that unspent 2019-2020 dollars could be rolled over to 2020-2021 school year. However, as the reality is clear that many schools will still be offering alternative meal distribution in the new school year, these dollars will be unable to be spent without waiver extension. FFVP is a proven program that promotes children’s exposure to fruits and vegetables, increases consumption while decreasing food waste, reduces obesity, and supports agriculture. Allowing FFVP to continue under all serving models in
the 2020-2021 School Year is a win-win-win for schools, students, and the fresh produce supply chain. Without it, money will literally be left on the table and students will receive less nutrition.

**Vegetable Subgroups Must be Maintained**

United Fresh supports USDA extending the waiver of the Seamless Summer Option (SSO) to accommodate those schools that are implementing virtual education or other models that will require non-congregate meal service. We oppose waiving the vegetable subgroup requirements under the SSO. It is important to keep in mind that when closures hit schools – all segments of the supply chain were forced to pivot overnight. Growers and distributors were previously providing fresh fruits and vegetables in volume foodservice packs that were needed for salad bars and other congregate-style feeding, and individually-wrapped or single-serve options were available, but not always in greatest demand.

While there were instances where disruptions existed as demand for these items surged and the supply chain needed time to adjust, growers and distributors have risen to the challenge investing significantly in pre-packaged fresh fruits and vegetables. Growers and distributors are now providing individually wrapped, single serve, or multi-day fresh fruits and vegetables when that is what the market demands. **In a recent survey of just United Fresh members that serve schools – nearly 130 companies across all USDA regions have single-serve, individually-wrapped fresh fruits and vegetables available.** Instead, USDA should focus on providing resources and flexibility to schools that maximizes participation to ensure that as many meals as possible can be served under varying meal distribution styles to keep the supply chain stable.

Additionally, USDA has already issued a nutrition standards waiver that would allow schools, on a case-by-case basis, to be given flexibility from nutrition standards should a supply chain disruption occur. To waive subgroups altogether would provide further market disruption, hurt American agriculture, and fall short of the National School Lunch Program’s commitment to ensure that all children have access to a meal that aligns with the Dietary Guidelines for Americans.

Now more than ever, it’s critically important to help children (and adults) eat a healthy diet as part of our fight against the coronavirus pandemic. With growing research showing the importance of nutrition and healthy diet to our country’s readiness to fight the pandemic, now is not the time to roll back access to vegetables for kids.

**Ensuring All Students are Fed**

United Fresh continues to support efforts to ensure that schools are prepared with the resources they need to serve students during this difficult time. We encourage USDA to extend the non-congregate waiver of the Seamless Summer Option, extend area eligibility, waive the afterschool activity requirement for Afterschool Meal and Snack programs, provide emergency USDA School Kitchen Equipment grants to accommodate alternative meal service needs, and identify options to provide universal free meals for the 2020-2021 School Year. Given the combination of scenarios that includes alternative serving models, even within the same school district, the need to minimize contact and maintain social distance in service and cashier lines, and the economic challenges facing so many American families, and the additional costs schools are absorbing – providing schools the resources to ensure that all children can receive a nutritious breakfast and lunch in the 2020-2021 School Year will strengthen American agriculture and most importantly, do right by school nutrition professionals and students.
In closing, school nutrition professionals have gone above and beyond to ensure children in their community have access to healthy meals. It is critically important to preserve the nutritious integrity of school meals and provide resources to ensure that school meals continue to be one of our country's greatest safety nets.

Sincerely,

Tom Stenzel
President & CEO
United Fresh Produce Association

Cc:
Secretary Sonny Perdue
Deputy Undersecretary Brandon Lipps