



NATIONAL POTATO COUNCIL

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Docket ID: FNS-2017-0044

Parent Agency: Department of Agriculture (USDA)

Agency: Food and Nutrition Service (FNS)

Food Crediting in Child Nutrition Programs: Request for Information

To Whom It May Concern:

Thank you for the opportunity to comment on the National School Lunch Program, School Breakfast Program, Child and Adult Care Food Program, and Summer Food Service Program (Child Nutrition Programs) crediting system. The National Potato Council (NPC) provides a unified voice for U.S. potato growers and represents the interests of the U.S. potato industry on national issues. NPC believes that the decisions regarding which foods to offer in federally supported feeding programs should be made based on the nutrient contribution of individual foods and on the nutritional needs of children. To this point, we submitted comments in February to the request for information before it was extended. We would like to expand upon those comments here.

The National Potato Council wants to provide the agency with valuable information on what is currently taking place at the school level and how the crediting requirements combined with the nutrition standards are impacting what is being offered and consumed. To that end, we funded a survey of 300 school food service directors (SFSD), many of whom are registered dietitians, regarding their understanding of the regulations and how potatoes fit into the School Breakfast Program (SBP), specifically. While we are reviewing the full survey results at this time, a few key takeaways that specifically relate to this request for information include:

1. While potatoes are a source of many nutrients and a favored breakfast food among the American school children, the majority of our SFSD survey respondents agreed that the requirements for breakfast displace or prevent the offering of white potatoes and other starchy vegetables.
2. 90% of our SFSD respondents agree that potatoes at breakfast can be used to introduce kids to other types of vegetables. Given the strong feeling that potatoes paired with other vegetables can aid in their introduction, the impression left post-survey is that the serving of other vegetables could be heightened if potatoes were not disparaged against.
3. 92% of SFSD respondents agree that allowing potatoes to be more easily accessed at breakfast would help increase students' consumption of nutrients of concern (fiber and potassium).



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4. 88% of SFSD respondents agree offering potatoes at breakfast will not only encourage students to eat other nutrient dense foods, but also that offering potatoes specifically to those on free and reduced price breakfast would help drive overall participation in the SBP.
5. Lastly, over three quarters (78%) of respondents believe there would be less waste of fruits and other vegetables at breakfast if potatoes could be offered for two reasons: 1) as noted above other vegetables may be better accepted when served in conjunction with potatoes and 2) fruits would not need to be “doubled-up” as a breakfast offering if other widely accepted breakfast-type foods, such as potatoes, could be offered more readily.

While these are just a few of the key takeaways, we feel it helps make the case for a review of the limits set against potatoes at breakfast. NPC urges the USDA Food and Nutrition Service to carefully review these, in addition to our earlier comments, when making future decisions on school meals, especially breakfast.