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March 31, 2011

Julie Brewer
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Re: Comments on USDA Proposed Rule, “Nutrition Standards in the National School Lunch and School Breakfast Programs” (RIN 0584-AD59, Docket Number FNS-2007-0038)

Ms. Brewer,

Thank you for the opportunity to provide comments to the proposed school meal regulations. We appreciate the diligence and effort that USDA, and specifically the staff of Food, Nutrition, and Consumer Services, has put into the development of new school meal guidelines with the intent to provide more nutritious school meals that improve the dietary habits of school children and protect their health.

The National Potato Council (NPC) represents more than ninety percent of the commercial potato growers in the United States. Potato growers, along with the U.S. potato industry, firmly believe that the health of our nation’s children is a top priority and applauds efforts to improve children’s nutrition. However, the portion of the proposed rule that limits total servings of starchy vegetables (e.g., white potatoes, corn, lima beans, and green peas) to one cup per week to encourage students to try new vegetables in place of familiar starchy onesⁱ in the National School Lunch Program, and that eliminates these vegetables from the National School Breakfast Program, could have adverse effects on children’s health.

Evidence demonstrates that this proposed restriction:

- Will lead to a decrease in the nutritional content of school meals;
- Is not necessary to reach nutrient targets;
- Will lead to a decrease in vegetable consumption; and
- Will unnecessarily increase costs for school meal programs.

In addition, a nationally representative survey of school foodservice professionals shows a majority (51%) oppose the proposed limits on starchy vegetables. When informed of the positive nutritional role that vegetables like white potatoes provide, opposition increases significantly (63%). In addition, school foodservice personnel surveyed indicated that the majority of potatoes served in schools are baked, not fried – with less than one serving, on average, of deep fried French fries offered per week.ⁱⁱ

In summary, the potato industry would support:

- Increasing vegetable variety in school meals
- Allowing schools discretion to include vegetable diversity in school menus without arbitrarily limiting a vegetable that kids love to eat, is nutritious, and is cost effective.

Allowing white potatoes without limitations may actually save schools money and offer greater flexibility to buy other vegetables, like broccoli, to serve periodically and introduce other healthy choices into school menus.

The Proposed Starchy Vegetable Restriction Will Lead To a Decrease in Nutritional Content of School Meals

Many nutrients are vital for normal growth and development of children. However, four nutrients have been identified as the most important nutrients *all* Americans – especially children – should increase in their diets because of their importance in preventing long-term health consequences. The *Dietary Guidelines for Americans (DGA), 2010* states that “intake by Americans of some nutrients is low enough to be of public health concern. These are potassium, dietary fiber, calcium, and vitamin D.”ⁱⁱⁱ Therefore, DGA recommends that Americans “Choose foods that provide more potassium, dietary fiber, calcium, and vitamin D, which are nutrients of concern in American diets.”

In addition the 2010 Dietary Guidelines recommend that all Americans including school age children consume 5 cups of starchy vegetables a week. This is an increase in recommended consumption from the recommendations of the 2005 Dietary Guidelines for 3 cups of starchy vegetable per week. Limits on starchy vegetables as proposed in the meal plan are inconsistent with the 2010 Dietary Guideline recommendations.

Potatoes deliver a good source (providing at least 10% of DV) of two of the four nutrients of concern for children – potassium and dietary fiber. In fact, according to the DGA 2010, one *small* baked potato is the #1 source of potassium in the diet, providing 738 mg potassium in just 128 calories, and is listed among the top sources of dietary fiber (3 gm). In addition, according to SNDA III, one medium serving of oven-baked potato “French fry” wedges (114 grams) provides 474 mg potassium (more than 1 medium banana, which according to DGA 2010 provides 422 mg potassium).

School children are not meeting their potassium or dietary fiber requirements. USDA’s own research specifically demonstrates that school meal program participants are not meeting their potassium and fiber requirements, since mean daily potassium and fiber intakes of students at all school levels were less than 100 percent of their respective Adequate Intakes (AIs).^{iv}

Limiting the amount of vegetables, such as potatoes, in school meals can have a direct impact on the intake of two of the four nutrients of public health concern. An analysis of the correlation of food and nutrient intake shows that differences in potato consumption are consistent with observed differences in mean lunch intakes of potassium.^v

The following are nutrition facts about different preparations of potatoes in schools:

Baked Potato:

- According to SNDA III, one serving of a baked potato served in schools provided only 138 calories and a good source (providing at least 10% of DV) of potassium, dietary fiber, folate, manganese, niacin and phosphorus; and an excellent source (providing 20% of DV) of vitamin C and vitamin B6.^{vi}
- One small baked potato (standard portion size) with skin has 3 grams of fiber, slightly more than a ½ cup (standard portion size) of broccoli, which has 2.6-2.8 grams, providing a good source (or more than 10 percent of the Daily Value).^{vii}

Oven-Baked Fries:

- One medium serving of oven-baked French fries (114 grams) provides 474 mg potassium. This is more potassium than is provided by one medium banana (422 mg) – a food that is frequently cited as being high in potassium.^{viii}
- Oven baked French fries have 50 percent more vitamin C, more potassium and similar fiber levels as a serving of spinach.
- Oven baked French fries have almost three times the potassium and a similar amount of fiber as a serving of broccoli.
- Oven baked French fries have almost triple the potassium and double the fiber as a serving of green peppers.
- According to SNDA III data^{ix}, potato products provide less than five percent of total energy (calories), only three percent of sodium and six percent of total fat consumed at school lunch, yet they are:
 - The number one source of potassium for high school students, providing 13 percent of all potassium (number two source for all ages combined);
 - The number one source of fiber for high school students, providing 8 percent of all fiber (number two source for all ages combined);
 - The number one source of vitamin B6 for all ages, providing 10 percent of all B6; and
 - Are among the top 10 sources of vitamin E, vitamin C, magnesium, and phosphorus.

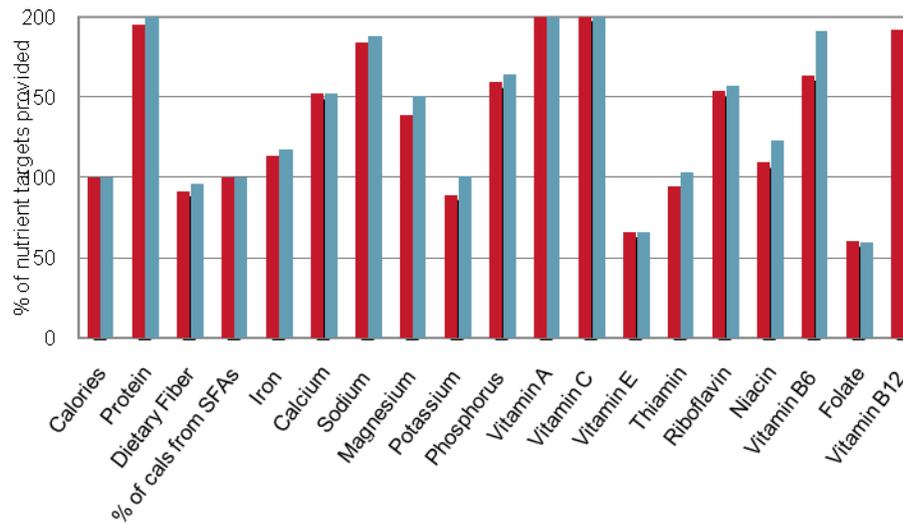
Starchy Vegetable Limits Are not Necessary to Reach Nutrient Targets and Do Not Guarantee Variety

Nutrient targets can be met and even exceeded without the proposed starchy vegetable limitation. A recently conducted menu modeling analysis shows inclusion of starchy vegetables (including potatoes four times per week) meets the Institute of Medicine’s (IOM) nutrition recommendations, and exceeds the targets for potassium and fiber.

Sample lunch menus contained in the IOM Report, “School Meals: Building Blocks for Healthy Children,” modified to offer starchy vegetables five days per week can meet, and in some cases exceed, the nutrient targets outlined in the IOM Report and the proposed rule (Table A and Appendix I)^x.

- Lunch menus with potatoes offered four days per week provided greater amounts of potassium and the same amount of fiber as the sample IOM lunch menus:
 - Potassium increased by a daily average of 129 mg, translating to an increase of 646 mg over one week, and 2584 mg over one month.
 - Fiber levels were essentially the same, with a slight daily bump of 0.3 g with the addition of starchy vegetables.
- Other key nutrients improved with increased potato options in school lunch: magnesium, vitamin B6, and niacin.
- Daily average of total fat is 10 percent less in the alternative menu offering potatoes four days per week than the original IOM menu. Average daily calories and saturated fat were similar for both menus and within IOM targets.

- Average daily sodium in the menus was essentially the same – 1175 mg in the menu with potatoes offered four days per week compared with 1176 mg in the original IOM menu.
 - In fact, the menu with potatoes offered four days per week had a better sodium-potassium ratio than the original IOM menu (0.88 vs. 0.98, ideal is ~0.5).
 - Both menus exceeded the recommended target of 640 mg sodium by 2020.
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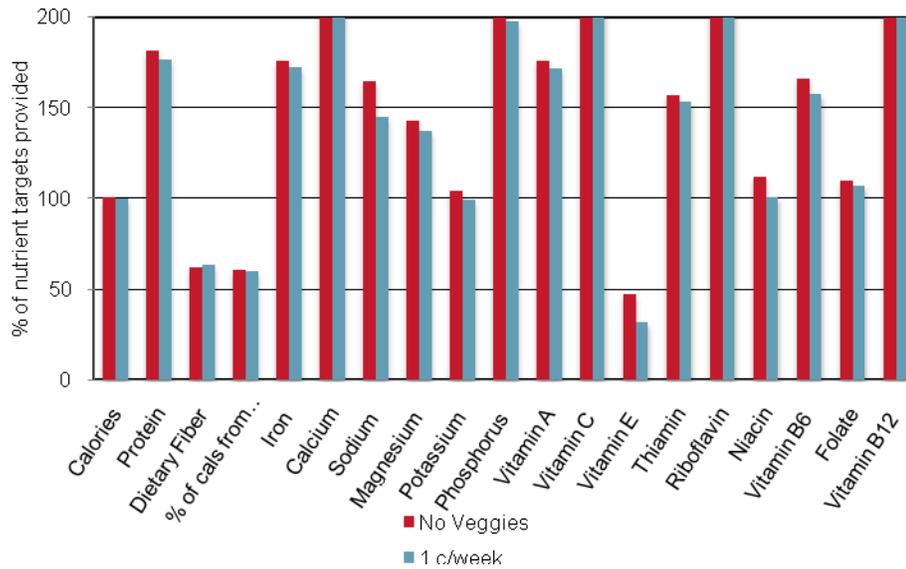


Comparison of 1 cup versus 2.5 cups Starchy Vegetable Servings/week at Lunch in Nutrient Targets

TABLE A. Meeting IOM

- When potatoes are included in school breakfast menus there is an increase in several nutrients provided, including potassium (Table B).
 - Potatoes at breakfast lead to an average daily increase in potassium of 43 mg compared to no vegetables offered at breakfast – that’s an additional 214 mg over one week and 855 mg over one month.
 - The average daily potassium provided at breakfast when potatoes are included was 945 mg, which meets the IOM Nutrient Target for breakfast of 909 mg, but is notably more than the 711 mg that students consumed in the most recent School Nutrition and Dietary Assessment Survey.^{xi}
- Other nutrients provided in greater amounts in the breakfast menu with potatoes included magnesium, phosphorus, niacin, and vitamin E.
- Adding potatoes does not significantly alter the fat, saturated fat, sodium or calories provided and depending on which foods they replace on the breakfast menu (i.e., pancakes, waffles, bagels, cereals and other foods consumed with syrups and jellies or that contain added sugar), could provide a solution to reducing added sugar consumption at breakfast.
- According to the National Cancer Institute, “the public should be told that additional servings of grains, fruits, and vegetables need to replace sources of added sugars and discretionary fat. Intakes of these components are currently higher than recommended.”

TABLE B. Comparison of NO vegetables versus 1 cup Starchy Vegetable Servings/week at Breakfast in Meeting IOM Nutrient Targets



Proposed Limitations Will Lead to Decreased Vegetable Consumption

Nine out of 10 Americans do not meet vegetable intake recommendations.^{xii} At a time when Americans, especially children, are not eating enough vegetables and fruits, it seems prudent to encourage *more vegetable choices – especially vegetables that kids will eat* - rather than fewer choices. Every major Federal public health nutrition education program, from the *Dietary Guidelines for Americans, 2010* and the Healthier US School Challenge to the First Lady’s *Let’s Move!* initiative, encourages increased vegetable intake. Yet the USDA is proposing to restrict certain vegetables – such as white potatoes – which has the potential to eliminate one of the only vegetables children are willing to eat. While not the intended outcome, this initiative may have the opposite effect of causing a *reduction* in vegetable consumption. To our knowledge, no science-based distinction can be drawn between starchy vegetables and other vegetables. Nutritional characteristics in the starchy vegetable category are dissimilar in their nutrient content and, in addition, the nutritional profile of some vegetables is almost the same as that of some fruits that are currently being encouraged (or at least are *not* being discouraged).

	Potato w/ skin	Banana
Calories	93	89
Sugars	1.18	12.23
Starch	17.27	5.38
Fiber	3.0	3.1
Protein	2.50	1.09
Vit C	9.6	8.7
Vit A	10	64
Calcium	15	5
Magnesium	28	27
Potassium	738	422

www.nal.usda.gov/fnic/foodcomp/search/

- Potatoes are one of the few vegetables that children actually consume, and cooked potatoes are the most common vegetable consumed by NSLP participants.^{xiii} Limiting access to vegetables at lunch and eliminating them from breakfast will significantly lower vegetable consumption among these children. As the only vegetable consumed at breakfast, and the vegetable most often consumed at lunch, potatoes provide children with valuable nutrients throughout the day.
- Vegetables like potatoes, as part of school breakfast menus, provide another meal occasion to increase the number of vegetable servings that children consume each week.
- Potatoes, in a variety of forms, make up approximately 30 percent of all vegetables eaten by NSLP participants.^{xiv}
- In addition, data from a recent survey of school food service professionals indicate that fried French fries are the least frequently served form of potato served in schools (less than 1 serving per week in both elementary and middle schools).^{xv} (Appendix II)
- NSLP participants were more than twice as likely as nonparticipants to consume at least one vegetable (as a distinct food item) at lunch (51 versus 23 percent). These differences were driven primarily by differences in potato consumption.¹⁵
- USDA does not believe that proposed changes will decrease school lunch participation or increase plate waste.^{xvi} However a majority of school foodservice directors (59%) surveyed believe limiting potatoes will have a negative impact on plate waste, with kids more likely to not take or eat the replacement vegetables.¹⁵

Proposed Restrictions Will Unnecessarily Increase Costs

At a time when local school food programs are struggling financially, the proposed rule would remove affordable, nutrient dense foods that provide important nutrients for the healthy development of children. Even in good economic times, local school food programs have always been challenged to feed children nutritious lunches with meager reimbursement. Now the government is asking them to do more, while mandating the limitation of a vegetable that is affordable and nutritious. Without a net gain in the nutrient quality of school meals, restricting potatoes is not justified.

- USDA estimates that the implementation of the proposed rule will increase costs by \$6.8 billion over five years, and that “small entities would incur roughly 80 percent of estimated costs.”^{xvii}
- Potatoes offer an affordable, nutrient-dense choice in school meals, especially compared with other, more expensive vegetables:
 - One serving of potatoes delivers 13 percent of a child’s daily potassium needs for less than five cents.
 - The school meal menu model analysis demonstrates that limiting starchy vegetables to 1 cup/week will increase costs by 5.6 percent with no improvement in, and possible adverse affects on, nutrition quality.
 - Non-starchy vegetable alternatives are significantly more expensive than potatoes, costing approximately 15 percent (for lettuce) to 84 percent more (for carrots).
- For many schools that operate on very slim margins, this 5.6 percent cost increase could have a significant impact on their ability to provide nutritious meals to children. For example, a limit on starchy vegetables would result in increased meal costs of over half a million dollars to DC Public Schools, who served 7.5 million lunches in 2009.

- The six-cent reimbursement contained in the recently passed child nutrition legislation is a step in the right direction – however, the seven-cent cost per meal to limit starchy vegetables is not.
- Over half (54 percent) of the school food service personnel surveyed believe the restriction will increase costs, and will NOT have any impact on the health of the students in the school lunch program.

Potatoes Served in Schools Today: Prepared Using More Healthy Methods

The proposed limit is based on data from the National Health and Nutrition Examination Survey 1999–2002 (USDA/FNS, 2008c), which is outdated information regarding the potato products served in today’s school meals.^{xviii} Many common misperceptions surrounding potatoes no longer apply, as students today are consuming more potatoes that are baked or boiled – not fried.

- Data from the school food service professionals survey indicate that on average there is less than one serving of deep-fried French fries offered per week.¹⁵
- In a recent nation-wide survey specifically on fryer use in school meal programs, the majority of respondents (79 percent) indicated that they prepared French fries using “Ovens Only.”^{xix}
- In addition to the fact that the majority stated that they prepare French fries using ovens, 61 percent of the respondents explained that they have removed or stopped using fryers in their school district.^{xx}
- For potatoes served in schools, the industry has taken considerable efforts to improve the health of their products, such as working to eliminate *trans* fats, change the oils in which potatoes are prepared, reduce saturated fats, and reduce sodium.

Opposition to Proposed Restrictions Among School Food Service and General Population

Those most familiar with the school meal programs and working in school food service on a daily basis do not support the IOM recommended restrictions that have been incorporated into the proposed rule. School food service personnel believe the restrictions will increase costs and plate waste, are not necessary to improve vegetable diversity, and will not have a positive effect on student health.¹⁵

- The majority (51 percent) of district level school food service directors surveyed oppose the recommendation to limit servings of potatoes and corn within the school lunch program with only one-third expressing support.
- When school food service directors are reminded of the important potassium and fiber contribution that potatoes make to children’s diets, the opposition to the IOM recommended limits increases significantly to a 62 percent majority.
- An overwhelming majority of respondents believe the IOM recommended limits are unnecessary, as their schools offer a wide variety of vegetables and potatoes and corn do not overshadow other choices.
 - 78 percent of district directors and 89 percent of school kitchen managers said their cafeterias deliver a range of vegetable choices for children;
 - 72 percent of district directors and 69 percent of school kitchen managers disagree with the assertion that potatoes and corn unfairly displace other vegetable choices on the school lunch menu; and
 - Directors and managers indicate there are eight vegetables (other than potatoes) served more than once a week in middle schools and high schools, and six different vegetables served more than once a week in elementary school lunch programs.

- The majority of survey respondents said they believed adopting the IOM’s restrictions would increase the amount of food schoolchildren end up dumping in the trash, drive up their food service costs, and have no effect on student health.
 - 59 percent predict plate waste will increase;
 - 54 percent expect costs will be higher; and
 - 54 percent believe student health will not be positively impacted.

The general public does not feel that the restrictions in the proposed rule constitute good policy. A recent nation-wide omnibus study (see Appendix III) demonstrates that the majority (53%) of Americans receiving government support oppose government recommendations that would limit access to potatoes and corn for the 55 million Americans that benefit from food assistance programs.^{xxi}

- Of the 2,092 Americans surveyed, 44 percent oppose the idea of restricting potatoes and corn in food assistance programs, while only 24 percent support this action.
- Survey respondents included 501 people that have benefitted from, or whose families have benefitted from, a federal food assistance program in the last year. Within this group the level of opposition increases to 53 percent, as people on food assistance want to enjoy access to *all* of their favorite vegetables just like Americans not reliant on food assistance programs.

School Food Service Personnel Need the Flexibility to Serve Nutritious, Economical Meals

In today’s economic environment, school food authorities need the flexibility to prepare meals that meet the nutritional goals and are consumed by participants, while being economically sustainable. Restricting servings of specific vegetables with no demonstrated positive effect, and possible detrimental effects, on nutrient levels unnecessarily hampers the ability of school food service personnel to properly do their jobs. As one of the most cost efficient of the many vegetables offered in the school meal each day, potatoes can help cash-strapped school food service personnel meet tight guidelines on nutrition and cost with an added bonus: schoolchildren actually eat potatoes.

- The survey of school foodservice personnel (Appendix II) indicates that almost half (48 percent) of district level directors feel that implementation of the limits on potatoes and other vegetables in the proposed rule is unrealistic.¹⁵
- The school meal menu model (see Appendix I) demonstrates that the limits are not necessary to meet the proposed nutrient targets.¹⁰
- The potato industry supports increasing variety for school meals and does not suggest that potatoes be served every day.
- Let schools decide how to include vegetable diversity in school menus without arbitrarily limiting a vegetable that kids love to eat, is nutritious, and is cost effective.
- Allowing potatoes without limitations may actually save schools money and offer greater flexibility to buy other vegetables, like broccoli, to serve periodically and introduce other healthy choices into school menus.

National School Lunch and National School Breakfast Rules Must Reflect the Most Recently Published Dietary Guidelines for Americans

As required in the Richard B. Russell National School Lunch Act, the rules for the National School Lunch

and National School Breakfast programs must reflect the most recent Dietary Guidelines for Americans.

(B) RULES.—Not later than 2 years after the date of enactment of this paragraph, the Secretary shall promulgate rules, based on the most recent Dietary Guidelines for Americans, that reflect specific recommendations, expressed in serving recommendations, for increased consumption of foods and food ingredients offered in school nutrition programs under this Act and the Child Nutrition Act of 1966 (42 U.S.C. 1771 et seq.). (Sec. 9. Pg. 3-12).^{xxii}

(1) NUTRITIONAL REQUIREMENTS.—Except as provided in paragraph (2), not later than the first day of the 1996–1997 school year, schools that are participating in the school lunch or school breakfast program shall serve lunches and breakfasts under the program that— (A) are consistent with the goals of the most recent Dietary Guidelines for Americans published under section 301 of the National Nutrition Monitoring and Related Research Act of 1990 (7 U.S.C. 5341). (Sec. 9. Pg 3-31).²²

The 2010 Dietary Guidelines for Americans recommend average intakes of 5 cups starchy vegetables per week (in a 2000 calorie diet)^{xxiii} compared with the 2005 Dietary Guidelines for Americans (average 3 cups/week in a 2000 calorie diet)^{xxiv}. While we recognize that the 2005 DGAs were the most recent DGAs available to USDA during the development of the proposed rule “Nutrition Standards in the National School Lunch and School Breakfast Programs”, this change in starchy vegetables recommendations is significant and dictates reconsideration of the starchy vegetable limitations in the proposed rule. Clearly, USDA understands the potential impact of the change in recommendations from the 2005 DGAs. In response to changes in the 2010 DGA recommendations for red-orange vegetable subgroup and the new protein foods subgroup USDA is formally requesting public comment on how these new subgroups may be incorporated into the proposed meal patterns.^{xxv} We strongly encourage USDA to consider the changes in the starchy vegetables subgroup recommendations in the 2010 DGAs in a similar manner as is being considered for red-orange and protein subgroup changes.

In summary, while the motivations are well intentioned, we believe that implementation of the proposed rule in its current form may have significant negative effects on the achievement of our mutual goal – providing children with nutritious meals and developing life-long healthy eating habits. For more information about the survey data or menu modeling analysis referenced, we welcome the opportunity to provide a briefing on these reports. Thank you for your consideration of these comments.

Sincerely,



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ⁱ Nutrition Standards in the National School Lunch and School Breakfast Programs; Proposed Rule; Federal Register Vol. 76; No. 9. 7 CFR Parts 210 and 220 pg.. 2500

ⁱⁱ MMS Education, Newton, PA. Survey of School Food Service Professionals, December 2010. Paid for by the National Potato Council. (Enclosed as Appendix II).

ⁱⁱⁱ U.S. Department of Agriculture and U.S. Department of Health and Human Services. *Dietary Guidelines for Americans, 2010*. 7th Edition, Washington, DC: U.S. Government Printing Office, December 2010. p. 40.

^{iv} USDA, FNS, Office of Research, Nutrition, and Analysis. School Nutrition Dietary Assessment Study – III: Summary of Findings, November 2007. <http://www.fns.usda.gov/ora/MENU/published/CNP/FILES/SNDAlII-SummaryofFindings.pdf>

^v School Nutrition Dietary Assessment Study-III: Volume II: Student Participation and Dietary Intakes. *Final Report. Mathematica Policy Research, Inc., November 2007.* <http://www.mathematica-mpr.com/publications/PDFs/SNDAlvol2.pdf>

^{vi} School Nutrition Dietary Assessment Study-III: Volume II: Student Participation and Dietary Intakes.

Final Report. Mathematica Policy Research, Inc., November 2007. <http://www.mathematica-mpr.com/publications/PDFs/SNDAvol2.pdf>

^{vii} U.S. Department of Agriculture and U.S. Department of Health and Human Services. *Dietary Guidelines for Americans, 2010*. 7th Edition, Washington, DC: U.S. Government Printing Office, December 2010. p. 88.

^{viii} School Nutrition Dietary Assessment Study-III: Volume II: Student Participation and Dietary Intakes. Final Report. Mathematica Policy Research, Inc., November 2007. <http://www.mathematica-mpr.com/publications/PDFs/SNDAvol2.pdf>

^{ix} School Nutrition Dietary Assessment Study-III: Volume II: Student Participation and Dietary Intakes. Final Report. Mathematica Policy Research, Inc., November 2007. <http://www.mathematica-mpr.com/publications/PDFs/SNDAvol2.pdf>

^x A Model Menu with Potatoes: Getting at the Root of Healthier School Menus (unpublished); National Potato Council; November 2010. (Enclosed as Appendix I)

^{xi} School Nutrition Dietary Assessment Study-III: Volume II: Student Participation and Dietary Intakes. Final Report. Mathematica Policy Research, Inc., November 2007. <http://www.mathematica-mpr.com/publications/PDFs/SNDAvol2.pdf>

^{xii} Krebs-Smith, S. et al. Americans Do Not Meet Federal Dietary Recommendations. *Journal of Nutrition*. October 1, 2010 vol. 140 no. 10 1832-1838.

^{xiii} USDA/FNS. 2008c. Diet Quality of American School-Age Children by School Lunch Participation Status: Data from the National Health and Nutrition Examination Survey, 1999-2004. Alexandria, VA. USDA/FNS. <http://www.fns.usda.gov/oane/MENU/Published/CNP/FILES/SchoolMealsIOM.pdf>

^{xiv} School Nutrition Dietary Assessment Study-III: Volume II: Student Participation and Dietary Intakes. Final Report. Mathematica Policy Research, Inc., November 2007. <http://www.mathematica-mpr.com/publications/PDFs/SNDAvol2.pdf>

^{xv} MMS Education, Newton, PA. Survey of School Food Service Professionals, December 2010. Paid for by the National Potato Council. (Enclosed as Appendix II).

^{xvi} Nutrition Standards in the National School Lunch and School Breakfast Programs, Table 12, pg. 2530, pg. 2538 <http://www.gpo.gov/fdsys/pkg/FR-2011-01-13/pdf/2011-485.pdf>

^{xvii} Nutrition Standards in the National School Lunch and School Breakfast Programs, pg. 2549 <http://www.gpo.gov/fdsys/pkg/FR-2011-01-13/pdf/2011-485.pdf>

^{xviii} IOM (Institute of Medicine). 2010. *School Meals: Building Blocks for Healthy Children*. Washington, DC: The National Academies Press. Pg. 49, 170.

^{xix} Y-Pulse Research, Food Service Director Survey, October 2010. Paid for by McCain Foods Limited.

^{xx} Y-Pulse Research, Food Service Director Survey, October 2010. Paid for by McCain Foods Limited.

^{xxi} Omnibus online survey of 2,092 American adults. Toluna Online Omnibus for the National Potato Council from November through December 2010. (Enclosed as Appendix III).

^{xxii} Richard B. Russell National School Lunch Act [As Amended through P.L. 108-269, July 2, 2004]. Section 9; pgs. 3-12; 3-31.

^{xxiii} U.S. Department of Agriculture and U.S. Department of Health and Human Services. *Dietary Guidelines for Americans, 2010*. Appendix 7; pg. 79.

^{xxiv} U.S. Department of Health and Human Services and U.S. Department of Agriculture. *Dietary Guidelines for Americans, 2005*. 6th Edition, Washington, DC: U.S. Government Printing Office, January 2005. The U.S. Departments of Agriculture (USDA) and Health and Human Services (HHS). Table 1; pg 11.

^{xxv} Federal Register/Vol. 76, No. 54/Monday, March 21, 2011. Incorporating the 2010 Dietary Guidelines for Americans into the Proposed School Meal Patterns. (7 CFR Parts 2010 and 220).