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Memo: Recommendations for Leveraging HHS Foodservice Operations to Advance the MAHA Strategy

To: Secretary Robert F. Kennedy, Jr.

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Introduction

The Department of Health and Human Services (HHS) has a unique opportunity to model the Make America Healthy Again (MAHA) food and agriculture agenda through its own food procurement, foodservice operations, and nutrition programs. By setting percentage targets of purchases of certified organic and pasture-raised, whole, and minimally processed foods free from harmful ingredients, additives, hormones, antibiotics, and unsafe animal drugs, HHS can improve health outcomes for the millions of Americans it serves while strengthening rural economies and supporting a more resilient and regenerative food system.

This memo outlines how HHS can integrate healthy and sustainable MAHA principles into its food purchasing and service operations – to improve diet quality, support small and sustainable producers, and set a model for other federal agencies.

The Opportunity: HHS's Food Purchasing Footprint

HHS plays a significant role in foodservice and nutrition policy across its agencies and programs, reaching millions daily:

- **Indian Health Service (IHS)** provides health care services to approximately 2.8 million American Indians and Alaska Natives across its network of 600 facilities. IHS hospital patients receive therapeutic meals tailored to medical needs, while outpatient clinics and

health centers may provide congregate meals or nutrition support services for community members.[1]

- **Head Start:** Administered by HHS and delivered in partnership with USDA's Child and Adult Care Food Program (CACFP), the Head Start program served 715,873 children and their family members, in centers, family homes, and family childcare homes for FY 2024.[2] While USDA funds and regulates food purchasing through CACFP, HHS influences program implementation and can encourage grantees to adopt MAHA-aligned nutrition and procurement practices. HHS recently announced a commitment to enhance MAHA aligned investments for headstart nutrition programs to promote healthy eating habits and increase access to nutrient dense foods.[3]
- **Senior Nutrition Programs:** Through the Administration for Community Living and in coordination with USDA's Commodity Supplemental Food Program (CSFP), HHS supports services for more than 700,000 low-income older adults each month.[4] Although USDA procures the food, HHS can play a role in ensuring these programs advance public health and align with MAHA healthy food principles.
- **Employee and facility cafeterias:** HHS operates foodservice facilities at major campuses, hospitals, and regional offices, including the CDC Cafeterias in Atlanta, the Humphrey Building cafeteria in Washington, D.C. and the CMS campus in Baltimore, serving tens of thousands of federal workers and patients each day.[5,6,7]

Why It Matters: Advancing a Healthy, Fair, and Organic Food System

Improving Public Health

MAHA recognizes diet quality as a foundation for disease prevention.[8] Increasing access to whole and minimally processed foods such as fruits, vegetables, legumes, and whole grains while reducing ultra-processed foods (UPFs) is associated with lower rates of obesity,

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[1] "Hhs-Ihs," www.performance.gov, n.d., https://www.performance.gov/agencies/hhs/service-providers/hhs-ihs/.
[2] Office of Head Start, "Head Start Program Facts: Fiscal Year 2024," Administration for Children and Families, U.S. Department of Health and Human Services, accessed November 5, 2025, https://headstart.gov/program-data/article/head-start-program-facts-fiscal-year-2024.
[3] U.S. Health and Human Services, HHS Expands MAHA to Head Start Adding $61.9 Million to Nutrition Services for Children and Families.
[4] "CSFP Factsheet | Food and Nutrition Service," www.fns.usda.gov, n.d., https://www.fns.usda.gov/csfp/factsheet.
[5] "The HHS Hubert H. Humphrey Building Cafeteria Experience: Incorporation of the Dietary Guidelines for Americans, 2010 into Federal Food Service Guidelines Office of the Assistant Secretary for Planning and Evaluation," 2012, https://aspe.hhs.gov/sites/default/files/private/pdf/76606/rpt.pdf.
[6] Office, "Regional Offices," HHS.gov, August 10, 2016, https://www.hhs.gov/about/agencies/ogc/offices/regional-offices/index.html.
[7] "Locations & Facilities CMS," Cms.gov, 2025, https://www.cms.gov/about-cms/work-with-us/careers/locations-facilities.
[8] "Make Our Children Healthy Again: Assessment." The White House, May 2025, 16. https://www.whitehouse.gov/wp-content/uploads/2025/05/MAHA-Report-The-White-House.pdf.

cardiovascular disease, and diabetes.[9,10] MAHA also recognizes the importance of reducing exposure to toxic pesticides, antibiotics, and hormone residues, and other animal drug residues,[11,12] and embracing pasture-based animal production (e.g., certified grass-fed beef). Shifting its own foodservice operations and the feeding programs it influences to prioritize healthy, minimally-processed, whole, additive-free, certified organic, and regeneratively produced foods would lead by example in improving diet quality, supporting public health, and rewarding farmers and ranchers who produce healthier food without the use of harmful chemicals.

Supporting Farmers and Rural Economies

Small and mid-sized producers, particularly those using regenerative and organic methods, face barriers to accessing institutional markets.[13] HHS can help fulfill the MAHA Commission Strategy's commitment to providing small farmers with "greater access to markets and infrastructure"[14] by promoting procurement policies and nutrition guidance that favor local, organic, and minimally processed foods. This approach stabilizes demand for family farms, circulates wealth in rural communities, and strengthens domestic supply chains.

Promoting Organic Agriculture and Diets

Organic farming is among the most comprehensive and time-tested agricultural systems for building resiliency and protecting human health, and it is enforced through a rigorous legal standard. Decades of research show that organic achieves the key aims of regenerative agriculture, including soil health and the protection of biodiversity, human health, and community wellbeing.[15]

Organic farmers do not use toxic pesticides. Pesticide exposure is linked to cancer, asthma, neurological and reproductive disorders, endocrine disruption, and a host of other serious health

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[9] Dietary Guidelines Advisory Committee. Scientific Report of the 2025 Dietary Guidelines Advisory Committee. U.S. Department of Health and Human Services and U.S. Department of Agriculture, 2025. https://www.dietaryguidelines.gov/2025-advisory-committee-report.

[10] Halsted Holman. "The Relation of the Chronic Disease Epidemic to the Health Care Crisis." ACR Open Rheumatol. 2020 Mar;2(3):167-173. doi: 10.1002/acr2.11114.

[11] The White House. *Make Our Children Healthy Again: Assessment*. May 2025. https://www.whitehouse.gov/wp-content/uploads/2025/05/WH-The-MAHA-Report-Assessment.pdf.

[12] The White House. *Make Our Children Healthy Again: Strategy*. September 2025. https://www.whitehouse.gov/wp-content/uploads/2025/09/The-MAHA-Strategy-WH.pdf.

[13] Hughes, Michelle, Andy Pressman, Lydia Oberholtzer, Carolyn Dimitri, and Rick Welsh. "Selling to Local and Regional Markets: Barriers and Opportunities for Beginning Farmers." National Center for Appropriate Technology, July 2022. https://attra.ncat.org/publication/selling-to-local-and-regional-markets-barriers-and-opportunities-for-beginning-farmers/.

[14] The White House. *Make Our Children Healthy Again: Strategy*. September 2025. p. 20. https://www.whitehouse.gov/wp-content/uploads/2025/09/The-MAHA-Strategy-WH.pdf.

[15] Friends of the Earth U.S. Organic is Regenerative Science Brief. (2024). https://foe.org/wp-content/uploads/2025/01/Organic-is-Regenerative-Science-Brief-Final.pdf

problems.[16,17] Organic farmers use practices that foster soil health and fertility with practices such as cover cropping, crop rotations, and the application of compost, mulch, green manure, or crop residues to build fertility.[18] Furthermore, animal foods, including certified pasture-raised poultry, grass-fed beef, and organic meat and dairy, do not rely on the use of hormones, growth promoters, or the routine use of medically important antibiotics and therefore do not contribute to the serious problem of antibiotic resistance.

Prioritizing procurement of certified organic and certified pasture raised foods especially protects vulnerable populations like children and pregnant women.

Leading by Example

As a leading agency on public health, HHS can influence nutrition standards and interagency collaboration across the federal government. The MAHA Commission made recommendations to "improve access to whole, healthy foods in government-funded nutrition programs and meals, including in school meals, prisons, and VA hospitals, and ensure the availability of nutritious whole food for populations in need."[19] By modeling MAHA-aligned foodservice and nutrition guidance, HHS can advance preventive health (reducing healthcare costs),[20] revitalize rural economies, and create a blueprint for agencies with an even larger food purchasing footprint like the various military branches and US Department of Agriculture to catalyze a government-wide shift toward healthier food systems.

Recommendations

1) Establish an HHS-wide food procurement policy with concrete purchasing targets. Create an agency-wide policy prioritizing procurement of organic, whole or minimally processed foods, and pasture-based animal products. Set measurable goals—for example, spending a minimum of 15% of total food purchases from certified organic and/or pasture-based producers, phasing out procurement of animal products with hormones or antibiotics and increasing procurement of pasture-raised and grass-fed meats, and ensuring 30% of entrees served in HHS cafeterias are scratch-cooked using whole ingredients by 2028. Provide implementation support to HHS departments and facilities to ensure progress.

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[16] Beyond Pesticides. Gateway on Pesticide Hazards. Beyond Pesticides: Berkeley, CA. Online. https://www.beyondpesticides.org/resources/pesticide-gateway

[17] Pesticide Action Network International. 2021. PAN International List of Highly Hazardous Pesticides. Pesticide Action Network International: Hamburg, Germany. March. https://paninternational.org/wp-content/uploads/PAN_HHP_List.pdf

[18] Organic Production and Handling Requirements, 7 CFR § 205.203 (2024). https://www.ecfr.gov/current/title-7/subtitle-B/chapter-I/subchapter-M/part-205/subpart-C

[19] White House, "The Make America Healthy Again Strategy," August 2025, 18, https://www.whitehouse.gov/wp-content/uploads/2025/09/The-MAHA-Strategy-WH.pdf

[20] Abrahams-Gessel S, et al. Implementing federal food service guidelines in federal and private worksite cafeterias in the United States leads to improved health outcomes and is cost saving. *J Public Health Pol.* 2022;43:266-280.

2) Pilot MAHA-aligned strategies in HHS managed cafeterias. Select one or more sites, such as the Humphrey Building cafeteria or an IHS facility, to pilot and promote menu shifts emphasizing whole, unprocessed, organic, and locally sourced foods. Document and share lessons learned through internal reports and workshops to inform agency-wide rollout.

3) Support other federal agencies in implementing similar strategies. HHS can amplify the impact of MAHA aligned food purchasing and food service strategies by helping to scale them across more sites within the federal government and facilitating inter-agency coordination. HHS can provide leadership and model policies for agencies that manage large-scale nutrition programs and foodservice operations.

4) Invest in research and technical assistance to identify and address barriers. Commission studies and stakeholder engagement to identify supply chain, cost, and infrastructure barriers to scaling MAHA-aligned food procurement. Share findings widely to inform both federal and private-sector foodservice providers.

Conclusion

HHS has a powerful opportunity to showcase what healthy, organic and regenerative federal food purchasing and foodservice can look like. By prioritizing whole and minimally processed foods grown using organic, regenerative practices supported by concrete purchasing targets, HHS can advance MAHA's goals to improve public health, revitalize rural economies, and reduce chronic disease burden.

Implementing a formal foodservice and procurement policy, piloting reforms in key facilities, and coordinating across federal agencies is a major opportunity for the federal government to make progress toward a healthier food system. Our organizations, many of which bring a significant amount of technical expertise on these matters, stand ready to support HHS to move this critical strategy forward.