

September 23, 2025

Submitted electronically via: <https://www.regulations.gov/>

The Honorable Robert F. Kennedy, Jr.
Secretary of Health and Human Services
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

The Honorable Brooke Rollins
Secretary of Agriculture
U.S. Department of Agriculture
660 North Capitol Street
Washington, D.C. 20001

The Honorable Dr. Marty Makary
Commissioner
Food and Drug Administration
10903 New Hampshire Ave
Silver Spring, MD 20993-0002

RE: Ultra-Processed Foods; Request for Information (Docket No. FDA-2025-N-1793)

Dear Secretary Kennedy, Secretary Rollins and Commissioner Makary,

Vizient, Inc. appreciates the opportunity to comment on the Department of Health and Human Services (HHS) Food and Drug Administration (FDA) and United States Department of Agriculture's (USDA) (collectively, FDA and USDA) request for information (RFI) to help define ultra processed foods (UPFs) for human food products in the U.S. food supply. Vizient encourages efforts to consider a uniform, science-based definition of UPFs through coordinated federal efforts that include opportunities for stakeholder input.

Background

[Vizient, Inc.](https://www.vizientinc.com), the nation's largest provider-driven healthcare performance improvement company, provides solutions and services to more than two-thirds of the nation's acute care providers and more than one-third of ambulatory providers. Vizient offers proprietary data and analytics to deliver unique clinical and operational insights and a contract portfolio representing \$156 billion in annual purchasing volume enabling the delivery of cost-effective care. With its acquisition of Kaufman Hall in 2024, Vizient expanded its advisory services to help providers achieve financial, clinical and operational excellence. Headquartered in Irving, Texas, Vizient has offices throughout the United States. Learn more at www.vizientinc.com.

Recommendations

Vizient appreciates the efforts of FDA and USDA to seek stakeholder input before drafting a uniform definition of UPFs. As efforts to define UPFs advance, Vizient welcomes the opportunity to collaborate and contribute expertise. Through our food solutions programming, representing \$5 billion in annual purchasing power across acute care centers, long-term senior care, higher education and public-school programs, Vizient brings insight into the practical realities of institutional food procurement, including the role of moderately processed foods in meeting nutritional, budgetary and operational needs.¹ These perspectives help ensure that the future definition of UPFs supports access to safe and nutritionally dense food options.

¹ <https://www.vizientinc.com/what-we-do/supply-chain/supply-chain-programs/food-solutions>

Incorporation of Various Factors into a Uniform Definition of Ultra-Processed Foods

FDA and USDA seek input on whether and how to incorporate various factors (e.g., nutritional attributes, manufacturing and processing, FDA-required ingredient labeling, existing classification systems) into a uniform definition of UPFs. When considering various factors, Vizient supports ensuring those factors have strong scientific support and broad consensus. As evidence and science evolve, we believe that the definition of UPFs must be similarly flexible to account for such changes. For example, an expert panel could be convened regularly to consider nutrient density with consideration of American dietary guidelines, ingredient composition (e.g., added sugars, refined starches, non-nutritive additives, functional additives), processing techniques and food system realities (e.g., affordability, geographic access and utilization, individual considerations like dietary restrictions, shelf-life). Vizient suggests that FDA and USDA consider potential processes, including expert panels, to identify and update a definition of UPF that is based on evidence and stakeholder input. Building on the expertise outlined above, Vizient welcomes the opportunity to contribute input as efforts progress to incorporate diverse factors into the definition of UPFs.

Also, Vizient suggests that FDA and USDA take a measured approach when considering potential definitions of UPFs and identifying potential unintended consequences. An overly broad definition of UPFs may not adequately capture the complexity of food processing and nutritional composition, potentially including widely consumed, shelf-stable and nutritionally valuable items (e.g., canned beans, dried milk, quick oats). Should that same definition be utilized in a different program, such as National School Lunch & Breakfast Programs (NSLP/SBP)^{2,3}, and aim to limit use of UPFs, then this may significantly limit food options that can be included, as there are already nutrient-based meal pattern requirements and other targets (e.g., sodium, whole grains). While each program may function differently and have variable goals, if the aim is for a uniform definition of UPF, then it is important that such a definition be useable alongside other requirements. To help prevent such challenges, inter-agency coordination and stakeholder input will help ensure a future definition can be effectively utilized.

Existing Classification Systems and Ingredient Labeling

In the RFI, FDA and USDA indicate that current UPF classification systems may inaccurately capture health-relevant characteristics by potentially mislabeling nutritionally beneficial items, like whole grain products and certain yogurt products, alongside foods high in added sugars, sodium and saturated fat. To avoid misclassification of nutritionally dense foods with those that have specific characteristics (e.g., high added sugar, high sodium, high saturated fat), the UPF definition could include key factors such as nutrient density with consideration of American dietary guidelines, ingredient composition (e.g., added sugars, refined starches, non-nutritive additives, functional additives), processing techniques and food system realities (e.g., affordability, geographic access and utilization, individual considerations like dietary restrictions, shelf-life). To avoid an overly rigid UPF definition, Vizient discourages FDA and USDA from utilizing a single algorithm at this point in favor of a more flexible approach that includes a range of factors. Appropriately balancing these factors will help ensure that the definition is flexible, developed with methodological transparency and reflects practical relevance, while minimizing unintended nutritional imbalances. As noted above, utilizing research and subject matter experts is one way that can help guide inclusion of these factors into a definition of UPFs.

² <https://www.fns.usda.gov/cn/legislation-regulations>

³ Other programs that may be relevant to consider include the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), Child & Adult Care Food Program, Supplemental Nutrition Assistance Program, federal procurement standards and Food Safety Modernization Act Preventive Controls.

Incorporation in Food and Nutrition Policies and Programs

In the RFI, FDA and USDA seek input regarding additional considerations when incorporating a UPF classification into food and nutrition policies and programs. As noted above, Vizient encourages FDA and USDA to work with different stakeholders, including those leading existing government programs, to carefully consider potential unintended consequences of a future UPF definition, particularly as programs may have alternative goals or already utilize a definition of UPF. Vizient believes this proactive approach will prevent potential disruptions and ensure a definition of UPF is utilized appropriately.

While Vizient also supports efforts to improve the food supply chain, we believe it is important to consider additional factors such as affordability and access, cultural and regional diets and shelf-life and food waste when developing and implementing a definition of UPF. For example, shelf-stable and frozen variations of fruits, vegetables, legumes and dairy often rely on moderate processing, and identifying these products as UPFs may be misleading if this definition were to imply that these products should be avoided or significantly limited. Also, moderate processing techniques, such as pasteurization and aseptic packaging, extend shelf life and reduce waste, which can be particularly helpful in locations where fresh options are limited. Should these measures result in certain foods no longer being eligible for different government programs or having reduced availability, this could exacerbate ongoing nutritional challenges. Vizient recommends consideration of these factors when developing and implementing a definition of UPF. Further, should a consensus definition of UPF be identified, Vizient notes a phased approach to implementation may be warranted so there is an opportunity to adapt and to and prevent access issues.

Lastly, considering both implementation and the definition of UPFs, Vizient encourages ongoing review and evaluations. As research continues to evolve, a clear, evidence-based process in place to review such information and incorporate this information in UPF-related policies or the definition of UPFs will help ensure the longevity of any finalized approach.

Conclusion

Vizient appreciates the agencies' efforts to gain feedback to develop a uniform definition of UPFs and we welcome continued engagement with the agencies in this important work. Vizient membership includes a wide variety of hospitals ranging from independent, community-based hospitals to large, integrated health care systems that serve acute and nonacute care needs. Additionally, many are specialized, including academic medical centers and pediatric facilities. Individually, our members are integral partners in their local communities, and many are ranked among the nation's top health care providers. In closing, on behalf of Vizient, I would like to thank the agency for providing us the opportunity to comment on this RFI. Please feel free to contact me, or Jenna Stern at Jenna.Stern@vizientinc.com, if you have any questions or if Vizient may provide any assistance as you consider these recommendations.

Respectfully submitted,



Shoshana Krilow
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Vizient, Inc.