CAPROCK STRATEGIES

Make America Healthy Again
Policy Memo | Second Edition

FOOD, HEALTH AND THE MAHA AGENDA: A FEDERAL AND STATE POLICY BLUEPRINT

/ EXECUTIVE SUMMARY

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OVERVIEW

This is the second edition of Caprock Strategies' policy memo analyzing the Make America Healthy Again (MAHA) movement—now institutionalized under the Trump-Kennedy alliance. Since our original publication, MAHA has evolved from a bold campaign talking point into a sweeping federal agenda reshaping food, nutrition and public health policy. With Robert F. Kennedy Jr. now serving as Secretary of Health and Human Services, MAHA is driving rapid regulatory change through new executive orders, agency realignments and a growing body of legislation. This memo provides a strategic update on key developments across HHS, USDA, the FDA and beyond, highlighting state-level acceleration, congressional engagement and cultural momentum led by MAHA's grassroots base.

For readers seeking deeper insight, a comprehensive, agency-by-agency breakdown is available by request at *erin@caprockstrategies.com*. We encourage early engagement with this broader version, especially for those navigating food and health policy in the year ahead.

MAHA: A MOVEMENT WITH REACH

The Make America Healthy Again (MAHA) movement isn't confined to one department or one political figure. It's a sprawling, cross-government initiative with touchpoints across nearly every branch of the federal government, multiple statehouses and a growing cultural coalition.

At its core stands Secretary Robert F. Kennedy Jr., leading the Department of Health and Human Services, but MAHA's reach extends far beyond HHS. From President Trump in the Oval Office to Secretary Brooke Rollins at USDA, the FDA Commissioner, the EPA, Education, Veterans Affairs, and even the Office of Management and Budget, MAHA relies on an intricate web of federal agencies to deliver sweeping reform on everything from school lunches to food dyes, SNAP purchases to seed oil use.

On Capitol Hill, the movement has sparked a bipartisan response, including the formation of a Congressional MAHA Caucus in both chambers with lawmakers introducing bold legislation on nutrition, transparency and chronic disease prevention.

State leaders, too, are stepping up. Governors, legislators, and agencies across the country are moving faster than Washington in some cases, introducing state-level bans, launching MAHA commissions and rethinking school meal standards.

And then there's the cultural power—a groundswell of support from parents, influencers and health advocates who are using their platforms to pressure industry and propel change. From Vani Hari to Calley and Casey Means, the "outsiders" are now shaping policy from the inside.

The MAHA movement is not a moment. It's a machine—made up of people, policies and political will—that touches nearly every corner of government and every level of leadership.

EXECUTIVE BRANCH

WHITE HOUSE

HEALTH AND HUMAN SERVICES

U.S. DEPARTMENT OF AGRICULTURE

DEPARTMENT OF EDUCATION

ENVIRONMENTAL PROTECTION AGENCY

FEDERAL TRADE COMMISSION

DEPARTMENT OF VETERANS AFFAIRS

Vince Haley
Assistant to the President for Domestic Policy and Executive Director of the MAHA Commission

Calley Means
White House Special Adviser on Health, MAHA

Elon Musk
DOGE Special Adviser

Martin Makary
FDA Commissioner
Kyle Diamantas
FDA Acting Deputy Commissioner for Human Foods

Mehmet Oz
CMS Administrator

Jay Bhattacharya
NIH Director

LEGISLATIVE BRANCH

HOUSE

Vern Buchanan (R-FL)

John Joyce (R-PA)

Lloyd Smucker (R-PA)

Ronny Jackson (R-TX)

GT Thompson (R-PA)

SENATE

Roger Marshall (R-KS)

Tommy Tuberville (R-AL)

Rick Scott (R-FL)

Cynthia Lummis (R-WY)

Ron Johnson (R-WI)

Mike Lee (R-UT)

Rand Paul (R-KY)

STATE GOVERNORS

INFLUENCE OUTSIDE THE BELTWAY

On August 23, 2024, Robert F. Kennedy Jr. (RFK Jr.) suspended his once Democratic, then Independent presidential campaign and joined forces with President Donald Trump. That evening, RFK Jr. announced his endorsement was due to their shared commitment to making America healthy again (MAHA).

Now serving as Secretary of the Health and Human Services Department (HHS), RFK Jr. is championing a national strategy to address the root causes of America's chronic disease crisis: poor diets, environmental toxins and inadequate healthcare systems. Preventative healthcare and real food initiatives are the MAHA movement's vehicles for launching a war on chronic disease.

This epidemic is the root from which all other branches of MAHA grow. It powers the Secretary's initiatives and binds together people from opposite sides of the aisle.

The MAHA agenda spans food dyes, ultra-processed foods, fluoridated water, pasteurized milk, seed oils, pesticides, microplastics, vaccines and per- and polyfluoroalkyl substances. It is broad, and its goals cannot be achieved by HHS alone. The movement will require engagement across agencies, Congress, state governments and the public.

Understanding how MAHA operates and identifying who has power to enact policy changes is vital for those involved in food and nutrition. This memorandum explains the role of the federal government in implementing MAHA, highlighting key players and agencies.

Executive Branch Buy-In: From Trump to the MAHA Commission

The MAHA movement gained political strength when RFK Jr. endorsed President Trump in August 2024. This alliance transformed MAHA from a grassroots cause into a political force with influence across government.

President Trump embraced MAHA publicly, stating, "For too long, Americans have been crushed by the industrial food complex and drug companies..." and promising RFK Jr. would end the chronic disease epidemic and restore public health institutions. He has repeatedly stated he will let RFK Jr. "go wild" on food policy.

This marks a shift in Trump's approach. Historically resistant to regulation, the President is now supporting a new framework led by Health and Human Services Secretary Kennedy. On February 13, 2025, President Trump issued an executive order establishing the MAHA Commission, chaired by Secretary Kennedy.

The Commission is tasked with investigating chronic disease, especially in children. Within 100 days, it will produce an assessment. Within 180 days, it will develop a strategy to improve child health. The executive order sets four directives: transparency in federally funded research, prioritization of gold-standard studies, collaboration with farmers to improve food quality and expanded support for preventative health.

The Commission includes agency heads and senior advisors across the administration, including the Secretaries of Agriculture, Education, and Veterans Affairs; the EPA Administrator;

the FDA Commissioner; and the CDC and NIH Directors. Vince Haley, the Assistant to the President for Domestic Policy, serves as Executive Director.

This composition signals that MAHA has institutional support beyond HHS, reducing the risk of bureaucratic obstacles stalling the movement.

The Commission held its first meeting March 12, with a 100-day deadline looming in May. The group also hosted a roundtable focused on food ingredients and safety, with Secretary Kennedy expressing his goal to remove certain artificial dyes from the food supply. Industry pressure is mounting to MAHA their products before regulation does it for them.

Agency Implementation: HHS, USDA and the MAHA Machinery

Two agencies, HHS and USDA, are central to MAHA's food policy agenda. While MAHA initiatives are spreading across multiple departments, understanding who controls what is critical.

The Department of Health and Human Services (HHS) enhances the health of all Americans by overseeing public health, research, and safety. It houses the FDA, CDC and NIH. Secretary Kennedy is positioned to lead MAHA efforts through the FDA, which regulates 80 percent of the nation's food supply.

Secretary Kennedy's proposed crackdown on food additives will move faster with support from FDA Commissioner Martin Makary and Acting Deputy Commissioner for Human Foods Kyle Diamantas. Secretary Kennedy appears to have their backing.

Commissioner Makary, confirmed in March, brings a medical background and a history of involvement in food policy. His nomination underscores the Administration's commitment to investigating the link between food and chronic disease.

Diamantas now oversees all FDA nutrition and food safety activities. His limited prior food policy experience is balanced by industry knowledge. He noted this Administration will continue to focus on sugar and sodium reduction.

Regulatory action on food additives is accelerating under Secretary Kennedy's leadership. Following the FDA's early 2025 ban on Red Dye No. 3, Kennedy has publicly committed to eliminating other synthetic dyes and unsafe additives, including per- and polyfluoroalkyl substances (PFAS) and high-fructose corn syrup. On April 22, 2025, he joined FDA Commissioner Makary to announce a sweeping plan to remove synthetic food dyes from the U.S. food supply.

The FDA will begin revoking approval for Citrus Red No. 2 and Orange B, even if they are not currently in use, and is targeting six additional dyes—Red 40, Yellow 5, Yellow 6, Blue 1, Blue 2, and Green 3—for elimination by the end of 2026. To accelerate the transition, the agency is encouraging companies to voluntarily remove Red 3 ahead of its original 2028 deadline. A national standard and timeline are in development to support the shift toward natural alternatives, and the FDA will soon authorize four new natural color additives with plans to expand that list.

FDA is also exploring a major revision of its GRAS (Generally Recognized as Safe) rule. The proposal would eliminate the self-affirmed GRAS pathway and require companies to submit safety data for new food ingredients. Although this idea has historically been supported by Democrats, it is now gaining traction with Republicans, as well.

This move toward bipartisan reform could reshape the industry. But it clashes with President Trump's broader deregulatory agenda, which includes a 10-to-1 rule, repealing 10 regulations for every new one issued. Navigating this contradiction will be key.

The FDA's "healthy" labeling rule, finalized last year, was delayed until the end of April due to a regulatory freeze issued by President Trump. The rule is set to become effective on April 28, 2025. It allows manufacturers to voluntarily label products as "healthy" if they meet updated nutritional standards aligned with the Dietary Guidelines, including minimum food group content and limits on saturated fat, sodium and added sugars.

In March, Secretary Kennedy announced a new Administration for a Healthy America (AHA) within HHS. It consolidates several public health agencies to better coordinate chronic disease prevention and health equity programs.

USDA develops federal food, agriculture and nutrition policies. It administers SNAP and child nutrition programs like the National School Lunch Program and co-leads the Dietary Guidelines for Americans process with HHS.

USDA Secretary Brooke Rollins appears aligned with Secretary Kennedy, although natural tensions remain. USDA supports farmers and ranchers, while HHS is focused on consumer health. Future MAHA regulations could impact agricultural interests.

Secretary Kennedy has taken positions against sugar, seed oils and grains in children's diets. He has called for an end to crop subsidies that support processed food ingredients, but crop subsidies fall outside HHS's jurisdiction, and USDA has shown no sign of pursuing such reforms.

SNAP and Nutrition Assistance Programs

Before his confirmation, Secretary Kennedy called for restrictions on using SNAP to purchase soda and processed foods. He argued taxpayers should not subsidize unhealthy products.

He emphasized this during his confirmation hearing and has pledged to work with USDA to reform school meals and nutrition incentives. Secretary Rollins has echoed these concerns, signaling that she supports improvements to children's meals and better use of SNAP dollars.

While no formal USDA rule has been issued, Secretary Rollins has supported Secretary Kennedy's stance, stating states will now be allowed to bar SNAP purchases of soft drinks. States have long been able to apply for waivers, though none have succeeded—until now. States are being encouraged to submit waiver requests, and Secretary Rollins has agreed to approve them as was demonstrated alongside Arkansas Governor Sarah Huckabee Sanders in April when the state announced pursuing a plan to restrict SNAP benefits from being used to purchase soda, candy and certain other unhealthy items.

Incentives for healthy food purchases and stricter definitions of eligible items under SNAP are likely in the near future with Indiana and Arkansas leading the movement. Secretary Kennedy has said the solution is requiring companies to internalize costs, ending the illusion of cheap food.

The reach of MAHA extends even further beyond HHS and USDA. Although food and nutrition are the core focus, MAHA principles also touch on areas overseen by agencies such as the Environmental Protection Agency (EPA) and the Federal Trade Commission (FTC).

The EPA will play a critical role in enforcing stricter regulations on the use of pesticides and chemicals in food production—one of Secretary Kennedy's identified contributors to chronic disease. Meanwhile, the FTC may become an important partner in future MAHA efforts to limit or ban direct-to-consumer advertising for pharmaceuticals, particularly if the agenda expands to include over-the-counter drug regulations.

These intersections underscore the breadth of the MAHA agenda and suggest that a wide range of agencies will be involved in advancing, implementing or resisting parts of the movement.

Congressional Power Players and MAHA Legislation

Congressional support is necessary for MAHA's long-term viability. Though Secretary Kennedy's confirmation sparked controversy, many lawmakers across parties support his food and health priorities.

MAHA legislation is gaining momentum. Republican lawmakers formed MAHA Caucuses in both chambers. In the Senate, Senators Marshall, Tuberville, Scott, Lummis and Johnson are leading the charge. In the House, Representatives Buchanan, Joyce and Smucker are advancing companion efforts.

Early legislative efforts include:

- **Whole Milk for Healthy Kids Act**
  Sponsors: Representatives Glenn "GT" Thompson (R-PA) and Kim Schrier (D-WA) and Senators Roger Marshall (R-KS), Peter Welch (D-VT), Dave McCormick (R-PA) and John Fetterman (D-PA)
- **Dietary Guidelines Reform Act**
  Sponsors: Congressman Ronny Jackson (TX). Senator Roger Marshall (KS)
- **Food Ingredient Transparency Act**
  Senator Roger Marshall (KS) - *not released yet*
- **Healthy SNAP Act**
  Senator Mike Lee (UT)
- **SNAP Reform Act**
  Senator Rand Paul (KY)

These bills limit SNAP purchases and improve dietary transparency. They're mostly Republican-led but several have bipartisan co-sponsors.

State-Led Acceleration: The Field Moves Ahead

States have emerged as early MAHA champions, moving faster than the federal government. More than half of states introduced MAHA-aligned legislation in 2025.

West Virginia enacted a sweeping ban on seven dyes and two preservatives, effective 2028. California, Texas and Arizona have passed or proposed similar restrictions, especially in school meals. Utah's new law defines "ultra-processed foods" for the first time and bans fluoride in public water.

As of April, 51 bills targeting food additives were introduced in states this year. States are asserting their authority, which federal law allows as long as state laws don't directly conflict with FDA regulations. The food industry may be forced to reformulate products nationwide rather than manage state-by-state compliance.

Several states—including Idaho, Kentucky, Texas and Iowa—have introduced bills seeking federal waivers to restrict soda and candy purchases under SNAP. Idaho's bill could even restrict granola and power bars.

States cannot act unilaterally here, but with Secretary Kennedy's and Secretary Rollins' support, waivers are likely to be granted. This represents a sea change in SNAP policy.

Outside the Beltway: Grassroots Power and Cultural Influence

MAHA is not a top-down initiative. It is a grassroots movement, driven by parents, influencers and disillusioned consumers. Secretary Kennedy's policies resonate with voters who feel the system failed them.

"MAHA Moms" mobilized around his confirmation. They advocate for food reform in their communities and have pressured manufacturers to eliminate dyes and additives.

Influencers like Vani Hari and the Means siblings (Calley and Casey) have used social media and publishing to advance MAHA priorities. Their ideas—eliminating SNAP purchases of ultra-processed foods, splitting FDA oversight, ending pharma ads—are now reflected in actual policy proposals. Calley Means was appointed as a White House adviser on corporate influence in food policy.

While President Trump has historically embraced ultra-processed food, his administration is now backing MAHA initiatives. The pressure is working, and the food industry is already adapting.

Making America Healthy Again requires more than rhetoric. It demands action across agencies, legislatures and the private sector. MAHA's scope is large, its pace swift and its implications far-reaching.

Those working in food and nutrition policy must monitor the evolving landscape and anticipate change. Stakeholders who engage early will shape the future. Those who delay will be forced to react.

The MAHA era is underway. The question now is—*who is ready for it?*