



Child Nutrition Programs
USDA Food and Nutrition Service
Braddock Metro Center II
1320 Braddock Place
Alexandria, VA 22314

RE: Docket FNS-2024-0040: Request for Information: Grain-Based Desserts and High-Protein Yogurt Crediting in Child Nutrition Programs

March 26, 2025

To Whom It May Concern:

The International Dairy Foods Association (IDFA), Washington, D.C., represents the nation's dairy manufacturing and marketing industry, which supports more than 3.2 million jobs that generate \$49 billion in direct wages and \$794 billion in overall economic impact. IDFA's diverse membership ranges from multinational organizations to single-plant companies, from dairy companies and cooperatives to food retailers and suppliers. Together, IDFA members represent most of the milk, cheese, ice cream, yogurt and cultured products, and dairy ingredients produced and marketed in the United States and sold throughout the world. Delicious, safe and nutritious, dairy foods are foundational in American's diets and offer unparalleled health and consumer benefits to people of all ages.

IDFA appreciates the opportunity to respond to USDA's Request for Information (RFI) titled "Grain-Based Desserts and High-Protein Yogurt Crediting in Child Nutrition Programs," issued in the Federal Register on December 26, 2024. We address some of the specified questions below. We also offer the following general information:

Yogurt is an important part of U.S. child nutrition programs. It is included as a meat alternate and also provides essential nutrients through the dairy nutrient package. It is especially important as part of the School Breakfast Program and as a protein source for meatless meals. There are a variety of yogurts available through child nutrition programs including more traditional products

that may be high in protein and products characteristic of “Greek” or “Greek style” yogurts that have a thicker texture and also may be high in protein.

U.S. school meal programs are required to align with the goals and recommendations of the Dietary Guidelines for Americans (DGA). The 2020-2025 DGA¹, along with the 2025-2030 Dietary Guidelines Advisory Committee scientific report², recommend three daily servings of milk or other dairy foods for adolescents and most children. With that said, the 2020-2025 DGA specifically states that nearly all age groups, including all school-age groups, of both males and females, consume significantly less than the recommended amounts.³

Any changes made to child nutrition programs should encourage increased consumption of dairy, in line with the DGA.

Strategies to Reduce Added Sugars at School Breakfast

RFI Question 2. What menu items are schools serving to reduce added sugars at breakfast? Examples may include protein foods (e.g., eggs; meat; tofu; beans, peas and lentils) or others.

Today there are many milk, yogurt and cheese options available to participants in the School Breakfast Program (SBP) that have lower levels of added sugars than in the past.

Milk processors supplying the vast majority of milk sold in schools have reduced added sugars in school milk through the IDFA Healthy School Milk Commitment. Low fat flavored milk is a key source of essential nutrients in school meal programs and as a result of the IDFA Healthy School Milk Commitment, it will provide no more than 10 grams of added sugar per 8-fluid ounce serving by the 2025-2026 school year.

Milk processors have continually reduced the calorie and added sugar contents of flavored milk sold to schools. Between the 2006-2007 and 2020-2021 school years, average added sugar levels declined by 57 percent, from 16.7 grams to 8.2 grams in an 8-fluid ounce serving of flavored school milk.⁴ Since the Healthy School Milk Commitment began, the amount of added sugar in flavored milk sold to schools has further declined to 7.4 grams per serving, according to a survey of school milk suppliers in 2024.⁵

Yogurt is a nutrient rich dairy product that provides many of the same essential nutrients as milk, including calcium and protein. As with milk, yogurt is widely available in both unflavored and flavored varieties to be used either as an ingredient or eaten on its own or in conjunction with other

¹ U.S. Department of Agriculture and U.S. Department of Health and Human Services. Dietary Guidelines for Americans, 2020-2025. 9th Edition. December 2020. Available at [DietaryGuidelines.gov](https://www.dietaryguidelines.gov).

² 2025 Dietary Guidelines Advisory Committee. 2024. Scientific Report of the 2025 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Health and Human Services and Secretary of Agriculture. U.S. Department of Health and Human Services. <https://doi.org/10.52570/DGAC2025>

³ Dietary Guidelines Advisory Committee. 2020. *Scientific Report of the 2020 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Agriculture and the Secretary of Health and Human Services. Online Materials, Table 1.15.* U.S. Department of Agriculture, Agricultural Research Service, Washington, DC. Available at: <https://doi.org/10.52570/DGAC2020>.

⁴ Prime Consulting. All Channel Tracking: The Projection of Milk Volume by Sales Channel, August 2020.

⁵ Prime Consulting. All Channel Tracking: The Projection of Milk Volume by Sales Channel, August 2024.

foods, such as fruit. Yogurt products are available with varying levels of added sugar to increase consumption to meet the DGA recommended intakes and enable schools to purchase the variety that best meets the needs of their students.

Consumption of yogurt in general has been associated with better diet quality in children, with higher intake of multiple nutrients, including calcium, potassium, magnesium, and vitamin D.⁶ Yogurt consumption has been associated with lower incidence of cardiovascular risk factors in adolescents, particularly total and abdominal excess body fat.⁷

Scientific studies are pointing to the favorable effect of yogurt on the gut microbiome and related health status. Yogurt, including both low-fat and full-fat varieties, has been shown to have a beneficial influence on the microbiome, as well as associations with healthier dietary patterns and reduced visceral fat mass.⁸ Diets high in fermented foods, including yogurt, can increase microbiota diversity and decrease markers of inflammation.⁹

Last year, FDA approved a new qualified health claim for the consumption of yogurt and reduction of risk of type 2 diabetes.¹⁰ This new claim reflects a body of science that has shown that 3 servings of yogurt each week helps reduce the risk of developing type 2 diabetes.

Cheese is a recognized protein source and meat alternate in U.S. school meal programs that has become even more important as schools serve meat-free meal options. Most cheese products have no added sugar.

While a goal of the DGA is for Americans to consume less added sugar, the 2020-2025 DGA recommends that the best use of added sugars in a healthy diet is to add them to under-consumed, nutrient-rich foods to increase consumption of these nutritious options.¹¹ The 2020-2025 DGA also stated that “[a] small amount of added sugars, saturated fat, or sodium can be added to nutrient-dense foods and beverages to help meet food group recommendations....” The 2015-2020 DGA were even more explicit, stating, “Healthy eating patterns can accommodate other

⁶ Cifelli CJ, Agarwal S, Fulgoni V. Association of Yogurt Consumption with Nutrient Intakes, Nutrient Adequacy and Diet Quality in American Children and Adults. *Nutrients* 2020, 12, 3435; doi:10.3390/nu12113435.

⁷ Moreno LA, Bel-Serrat S, Santaliestra-Pasías A, Bueno G. Dairy products, yogurt consumption, and cardiometabolic risk in children and adolescents. *Nutr Rev.* 2015 Aug;73 Suppl 1:8-14. doi: 10.1093/nutrit/nuv014. PMID: 26175484.

⁸ Le Roy CI, Kurilshikov A, Leeming ER, Visconti A, Bowyer RCE, Menni C, Fachi M, Koutnikova H, Veiga P, Zhernakova A, Derrien M, Spector TD. Yoghurt consumption is associated with changes in the composition of the human gut microbiome and metabolome. *BMC Microbiol.* 2022 Feb 3;22(1):39. doi: 10.1186/s12866-021-02364-2. Erratum in: *BMC Microbiol.* 2022 Feb 28;22(1):66. PMID: 35114943; PMCID: PMC8812230.

⁹ Wastyk HC, Fragiadakis GK, Perelman D, Dahan D, Merrill BD, Yu FB, Topf M, Gonzalez CG, Van Treuren W, Han S, Robinson JL, Elias JE, Sonnenburg ED, Gardner CD, Sonnenburg JL. Gut-microbiota-targeted diets modulate human immune status. *Cell.* 2021 Aug 5;184(16):4137-4153.e14. doi: 10.1016/j.cell.2021.06.019. Epub 2021 Jul 12. PMID: 34256014.

¹⁰ <https://www.fda.gov/media/176608/download?attachment>

¹¹ Wastyk HC, Fragiadakis GK, Perelman D, Dahan D, Merrill BD, Yu FB, Topf M, Gonzalez CG, Van Treuren W, Han S, Robinson JL, Elias JE, Sonnenburg ED, Gardner CD, Sonnenburg JL. Gut-microbiota-targeted diets modulate human immune status. *Cell.* 2021 Aug 5;184(16):4137-4153.e14. doi: 10.1016/j.cell.2021.06.019. Epub 2021 Jul 12. PMID: 34256014.

nutrient-dense foods with small amounts of added sugars, such as... fat-free yogurt, as long as calories from added sugars do not exceed 10 percent per day, total carbohydrate intake remains within the Acceptable Macronutrient Distribution Range, and total calories intake remains within limits.”¹² The 2015-2020 DGA also states, “Some sweetened milk and yogurt products may be included in a healthy eating pattern as long as the total amount of added sugars consumed does not exceed the limit for added sugars, and the eating pattern does not exceed calorie limits.”¹³

A recent report from USDA to Congress identified flavored yogurt and flavored milk as top contributors to added sugar content in the National School Lunch Program (NSLP) and SBP.¹⁴ Dietary intake research, however, shows that yogurt and flavored milk are not top contributors to added sugar intake in the overall diets of children. This same research shows these foods positively impact intakes of dairy and accompanying nutrients such as calcium and vitamin D. Added sugar should be considered in context to the nutrient density of a food, how the food fits into an overall healthy dietary pattern and the role of the food in helping children to meet DGA recommendations. It is important for schools and students to have access to a variety of nutrient-dense dairy foods to promote intakes of this important food group, drive program participation and help operators best serve students.

Flavored yogurt and flavored milk are perfect examples of nutrient-dense foods that benefit from limited amounts of added sugars to address consumer preferences and help consumers meet the recommended intake of dairy and accompanying nutrients. Flavored, sweetened dairy products, such as milk and yogurt, contain the same vitamin and mineral composition as their unflavored counterparts and count towards the recommended daily servings of the dairy group.

- a. *Please share examples of breakfast menu items lower in added sugars that are popular with students.*

Yogurt’s role as a meat alternate/protein food is particularly key in the SBP. In addition to being well-accepted as breakfast food, one study identified yogurt inclusion in children’s breakfast as responsible for triggering an improvement in nutrient intake and in other nutrient dense foods, like fruit.¹⁵ When considering a variety of breakfast options, the optimal breakfast pattern for children was characterized by the inclusion of yogurt and milk among other foods and beverages.¹⁶

¹² U.S. Department of Health and Human Services and U.S. Department of Agriculture. 2015-2020 Dietary Guidelines for Americans 8th Edition.

¹³ U.S. Department of Health and Human Services and U.S. Department of Agriculture. 2015-2020 Dietary Guidelines for Americans 8th Edition.

¹⁴ U.S. Department of Agriculture, Food and Nutrition Service. “Added Sugars in School Meals and Competitive Foods: A Report to Congress.” May 2022.

¹⁵ López-Sobaler AM, Cuadrado Soto E, Salas González M^aD, Peral Suárez Á, Jiménez Ortega AI, Ortega RM. Papel del yogur en el desayuno de los niños [Role of yogurt in children's breakfast]. *Nutr Hosp*. 2019 Aug 27;36(Spec No3):40-43. Spanish. doi: 10.20960/nh.02806. PMID: 31368331.

¹⁶ Drewnowski A, Rehm CD, Vieux F. Breakfast in the United States: Food and Nutrient Intakes in Relation to Diet Quality in National Health and Examination Survey 2011–2014. A Study from the International Breakfast Research Initiative. *Nutrients*. 2018 Sep 1;10(9):1200. doi: 10.3390/nu10091200. PMID: 30200424; PMCID: PMC6163505.

High Protein Yogurt Crediting

Clarity on Terminology

IDFA would like to call to USDA's attention the federal definition of "high protein" for all FDA-regulated products, including yogurt. A claim of "high" nutrient content, including protein, requires the product to provide at least 20% of the Daily Value (DV) per Reference Amount Customarily Consumed (RACC).¹⁷ Therefore, "high protein yogurt" must provide at least 10 grams of protein per 6 ounces of yogurt, or 6.7 grams of protein per 4 ounces of yogurt. High protein yogurt may be a "Greek" or "Greek-style" yogurt, but there can also be high protein yogurts that are not "Greek" or "Greek-style."

Greek yogurt or Greek-style yogurt is standardized yogurt with a thicker texture, which may be achieved by straining the yogurt or by adding safe and suitable ingredients which provide thickness. While many Greek or Greek-style yogurts have higher levels of protein than traditional yogurt, they may or may not have enough protein to qualify as "high protein."

In line with USDA's own Commercial Item Description (CID)¹⁸, "high protein" is used in conjunction with the standardized term "yogurt" as defined in the Code of Federal Regulations at 21 CFR 101.54(b)(1). This CID also defines "strained" yogurt as one option of making high protein yogurt, and "not strained" yogurt as yogurt with added dairy ingredients which may result in a high protein content. This document reinforces that the identifiers "high protein," "strained," and "not strained" are not synonymous or interchangeable. Greek or Greek-style is not identified in the CID, but "Type II" yogurt is described as high protein and with a thicker texture.

To ensure clarity within these comments, IDFA will use the term "high protein" to refer to all yogurts that provide at least 10 grams of protein per 6 ounces and "Greek" or "Greek-style" to refer to yogurts with a thicker texture, no matter how the yogurt was made and including yogurt with and without high protein levels. We request that USDA be similarly consistent and clear with terminology around yogurt, so that yogurt manufacturers and school food service program operators can clearly identify the types of yogurt that are being referenced.

RFI Question 2. If Program operators are not offering Greek or Greek-style yogurt, or other types of yogurt that contain more protein than regular yogurt as frequently as desired, why not? What are the challenges with offering these types of yogurt?

There are many products that would be available to schools that are very similar to standardized yogurt, and are dairy-based, providing the same dairy nutrient package provided by traditional, standardized yogurt. But some of these products may not meet the yogurt standard of identity (SOI), due to the way they are processed to in part increase the protein content of the product. Therefore, while these dairy based yogurt type products may provide similar nutritional benefits to standardized yogurt, these products are excluded from the Child Nutrition Programs (CNP).

RFI Question 3. Has high-protein yogurt availability via USDA Foods in Schools helped school program operators offer high-protein yogurt to participants?

¹⁷ 21 CFR 101.54(b) *Nutrient content claims for "good source," "high," "more," and "high potency."*

¹⁸ Commercial Item Description: Yogurt. A-A-20364

- a. *Is high-protein yogurt incorporated into meals, particularly breakfast, in the same manner as traditional yogurt? Please share examples of how high-protein yogurt is used in menus and/or recipes; are traditional and high-protein yogurt used interchangeably or are there novel uses for high-protein yogurt in school meals?*

Yogurt, no matter the level of protein, is widely available in both unflavored and flavored varieties to be used either as an ingredient, eaten on its own, or eaten in conjunction with other foods, such as fruit. Yogurt is also widely available in a variety of formats including in large tubs for use as an ingredient or portioned out in individual cups or containers. These individual cups or containers are particularly convenient for serving as grab-and-go meals or as part of an in-classroom breakfast.

This wide range of uses applies to both conventional and high protein yogurt in CNP.

Potential Alternatives

RFI Question 1. Should FNS create a separate crediting standard for high-protein yogurt that is different than the crediting standard for regular yogurt? Why or why not?

IDFA's member companies have various positions regarding the crediting of high protein yogurt.

Some of our yogurt manufacturers support the same crediting values for both high protein and regular yogurt, believing that a lower level of crediting would contribute a lower level of dairy intake, exacerbating the under-consumption of dairy and the essential nutrients that dairy contributes to children's diets. Other IDFA members believe that high protein yogurt should be available for crediting at lower levels of yogurt, based on the level of high-quality protein that is provided, especially when compared to other meat alternates.

RFI Question 3. If high-protein yogurt were to contribute differently to the CNP meal patterns than regular yogurt, should FNS adopt FDA's definition of "high" for nutrient content claims used on food labels to define high-protein yogurt?

As indicated above, there is an FDA regulatory definition for "high protein" which applies to yogurt and currently, the CID uses the FDA's regulatory definition for "high" for the identifier "high protein yogurt."

The definition for "high protein" should remain consistent across FDA and USDA in rulemaking, regulations, guidance or other information used in association with CNPs. This alignment with the regulatory definition will permit yogurt manufacturers and program operators alike to understand what products will meet program requirements. If the claim "high protein" was not aligned, significant confusion could arise if the requirements for "high protein" in the CNP or CID did not match the labels of the products they receive or serve to program participants.

If the terms "Greek" or "Greek style" are used to refer to yogurt in CNPs, these terms should be clarified so that yogurt manufacturers and program operators know the products that are being referenced, such as those with a thicker texture. The terms "Greek" or "Greek style" should not be used interchangeably with "high protein" for the reasons described above.

- a. *What are the benefits or limitations of this approach?*

- b. *What opportunities or challenges could arise from having different limits for high-protein yogurt offered to children ages one through three, versus children and adults ages four and older?*

While the Recommended Daily Allowance (RDA) for protein for children between the ages of one and three years old is lower than that required for older children and adults, not all yogurt served to children of this age will be specifically marketed and packaged for young children. The basic definition of a “high” nutrient content claim would remain the same for nearly all food packages, including any not specifically sold for children less than 4. Any yogurt that meets the requirements of the CNP should be permitted to be included in meals and snacks served to children of all ages.

RFI Question 4. If high-protein yogurt contributes differently to the CNP meal patterns than regular yogurt, should USDA place any limits on the types of yogurt that can qualify as high-protein yogurt?

If USDA decides to implement different contributions for high protein yogurt, all yogurt that meets the definition of high protein should be treated the same way through the CNP meal patterns; specifically, the high protein yogurts must meet all CNP requirements for yogurt, including added sugar limits and align with the yogurt SOI.

- a. *Should changes be limited to any specific type of high-protein yogurt?*
- b. *Should yogurt that is thickened by adding thickening agents (e.g., polysaccharides or optional dairy ingredients) credit differently in CNPs? If yes, what implication might that approach have on the requirement for Program operator to plan CNP menus using food-based menu planning?*

Yogurt with a thicker texture, whether that thickness is achieved through filtration or addition of other ingredients, is not necessarily a high-protein yogurt. If a thicker texture is attained by addition of optional dairy ingredients, these ingredients may add high quality dairy protein, and the product could meet the definition of high protein. But if the additional ingredients are other thickeners such as polysaccharides, additional protein may not be added, and the resulting yogurt may not be a high protein product. Therefore, should USDA implement differential crediting, it should be for those yogurts that qualify as high protein, meet the yogurt SOI and the product-based added sugar limits regardless of type of yogurt or ingredients.

- c. *Should changes include plant-based yogurt alternatives (e.g., soy-based yogurt alternatives)?*

Currently, the definition for the NSLP (7 CFR 210.2) and the CID for yogurt defines “yogurt” as meeting the standard of identity (SOI) for yogurt. The yogurt SOI requires all dairy ingredients be combined, pasteurized and cultured unlike other food products. However, the USDA Food Buying Guide does include soy-based yogurt alternatives as options for a meat alternate in the CNP.

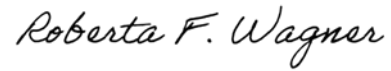
Conclusion

IDFA’s members are proud of the nutrient-rich dairy products that we supply to children through USDA’s CNP. IDFA appreciates the opportunity to provide comments on the Request for Information regarding high protein yogurt and added sugars in the CNP.

Sincerely,

A handwritten signature in cursive script that reads "Michelle Matto".

Michelle Matto, MPH, RDN
Associate Vice President, Regulatory Affairs and Nutrition

A handwritten signature in cursive script that reads "Roberta F. Wagner".

Roberta Wagner
Senior Vice President, Regulatory and Scientific Affairs