

**REQUEST FOR INFORMATION:
GRAIN-BASED DESSERTS
AND HIGH-PROTEIN YOGURT**

**USDA Food and
Nutrition Service**

Child Nutrition
Programs

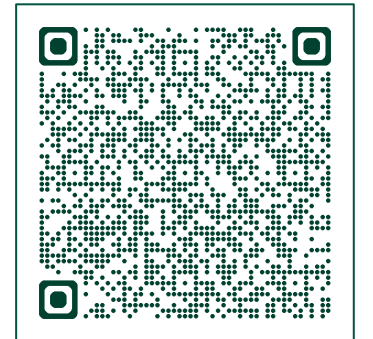
JANUARY 28, 2025

AGENDA

Overview of current policies

Request for input on potential changes

Tips for submitting strong comments



REQUEST FOR INFORMATION

- Allows Federal agencies to gather input from the public to inform future regulations, policy, or guidance
- Does NOT make, or propose to make, any changes to current requirements



FOOD CREDITING OVERVIEW

- Food crediting:
 - Determines how individual foods and beverages contribute toward meal components
 - Is based on the overall nutrient profile of a food or beverage
- FNS evaluates its crediting system on an ongoing basis to keep pace with the evolving food environment

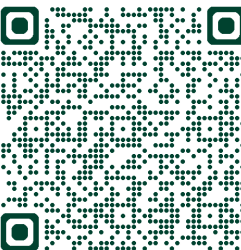
GRAIN-BASED DESSERTS

Current Policy, Potential Alternatives, and
Questions for Public Input

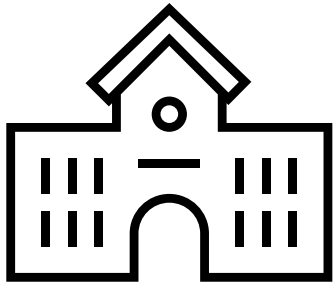
GRAIN-BASED DESSERTS

Current Policy:

- Grain-based desserts are identified by product type (e.g., cookies, granola bars, toaster pastries) in FNS guidance
- Grain-based desserts are limited, or prohibited, in certain Child Nutrition Programs; the limits vary by program



GRAIN-BASED DESSERTS



School Breakfast Program



National School Lunch Program



Child and Adult Care Food Program



GRAIN-BASED DESSERTS

Recent Rulemaking:

- FNS proposed to limit grain-based desserts in school breakfast to no more than 2 oz eq per week, consistent with the school lunch limit
- In response to public comments, FNS **did not finalize** this proposal

GRAIN-BASED DESSERTS

Questions for Public Input – Current Policies:

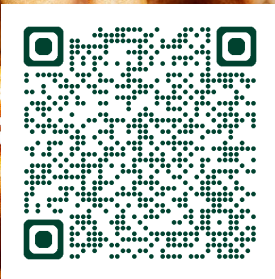
- What challenges do Program operators face in identifying grain-based desserts, under the current policies?
- Is the current National School Lunch Program policy that permits up to 2 ounce equivalents of grain-based desserts per week effective at reducing added sugars in school lunches?
- Should FNS adjust its current grain-based desserts policies, such as changing which grain products are categorized as grain-based desserts?



GRAIN-BASED DESSERTS

Additional Input – Potential Alternatives:

- Focus on “grains high in added sugars,” and define “high” using FDA’s definition of “high” for use on food labels
- If FNS were to establish limits for grains high in added sugars, how should the limits be established?
- How would this affect participants from different age groups?
- Other approaches suggested in comments



GRAIN-BASED DESSERTS



Strategies to Reduce Added Sugars at School Breakfast:

- Are there strategies for reducing added sugars at breakfast that would support alternative school breakfast models?
- What menu items are schools serving to reduce added sugars at breakfast?
- What additional resources from FNS could help Program operators reduce added sugars in Child Nutrition Program menus, including breakfast?

HIGH-PROTEIN YOGURT

Current Policies, Potential Alternatives, and
Questions for Public Input

HIGH-PROTEIN YOGURT

Current Policies:

- All types of yogurt credit the same in the Child Nutrition Programs
- Four ounces or ½ cup of yogurt credits as 1 ounce equivalent (oz eq) of meat alternate





HIGH-PROTEIN YOGURT

Current Landscape:

- FNS evaluates its crediting system on an ongoing basis to keep pace with the evolving food environment
- The marketplace has evolved since yogurt crediting was first established in the Child Nutrition Programs
- FNS seeks public input on whether yogurt crediting needs to be updated to reflect changes in the marketplace

HIGH-PROTEIN YOGURT

Questions for Public Input - Current Policy:

- Are Program operators currently offering Greek or Greek-style yogurt?
- What are the challenges with offering high-protein yogurt?
- Did the availability of high-protein yogurt through USDA Foods help schools provide this option to students?



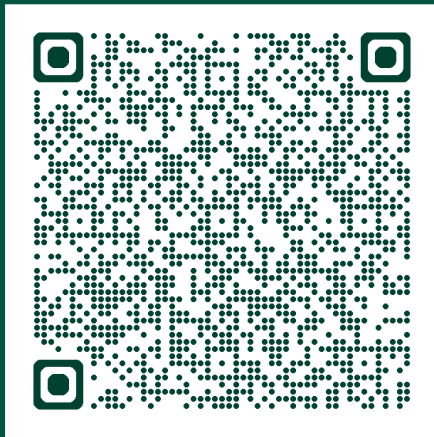


HIGH-PROTEIN YOGURT

Questions for Public Input – Potential Alternatives:

- Should FNS:
 - Create a separate crediting standard for high-protein yogurt that is different than the crediting standard for regular yogurt?
 - Limit the types of yogurt that can qualify?
 - Use FDA’s definition of “high” for nutrient content claims used on food labels?

HOW TO SUBMIT COMMENTS



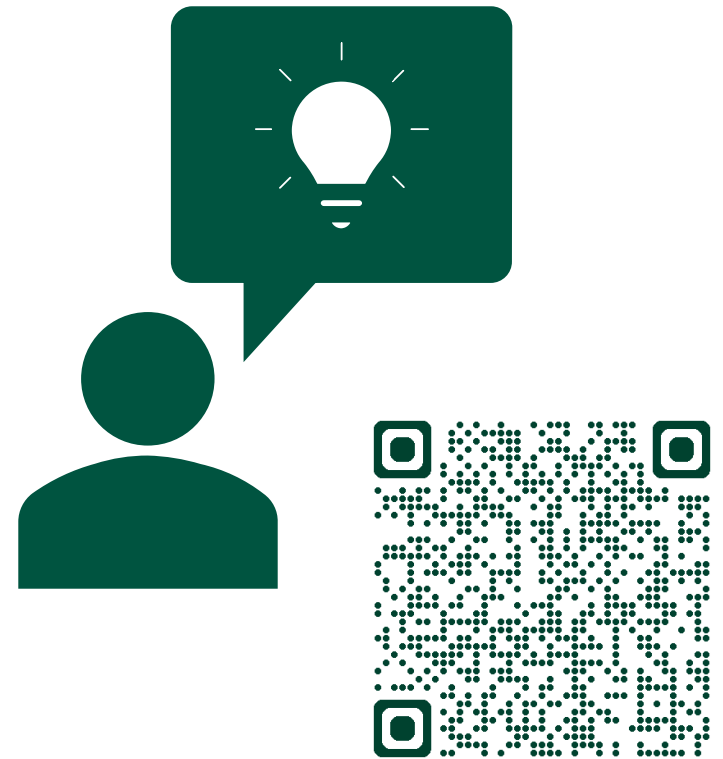
We encourage you to share your ideas through the public comment process!

Comments may be submitted electronically through [Regulations.gov](https://www.regulations.gov)

Comment period is open **NOW** through **March 26, 2025**

TIPS FOR COMMENTS

- Explain the reasoning; constructive comments are more likely to have an influence
- Identify credentials and experience
- Support your comment with information (data, expert opinions, personal experience)
- Describe the potential impact of changes
- Use the list of questions that FNS provided to develop your comment



QUESTIONS