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School Meals Policy Division—4th Floor
Food and Nutrition Administration
1320 Braddock Place
Alexandria, VA 22314

Public Comment: Expanding Fluid Milk Options in Child Nutrition Programs

Dairy Council of California appreciates the opportunity to submit comments for consideration by the Food and Nutrition Administration, U.S. Department of Agriculture (USDA), in response to Docket no. FNS-2026-0067. We commend the agency's efforts to improve the health of U.S. children and acknowledge the important role of fluid milk in Child Nutrition Programs.

The Role of Milk in Child Nutrition Programs

Milk is a required and vital part of Child Nutrition Programs because it is nutritionally rich, easy to consume and highly palatable, helping children meet their daily nutrient needs.¹ At all fat levels, dairy foods provide a unique combination of nutrients, including high-quality protein, calcium, vitamin D, potassium, iodine and other essential nutrients that work together to help support strong bones and muscles, cardiometabolic health, cognitive health and overall well-being across every life stage.² Providing the option for schools and child and adult care providers participating in Child Nutrition Programs to offer whole and reduced-fat (2%) milk supports children's health and provides flexibility to meet a range of needs and preferences.

Dairy Foods at All Fat Levels Support Health

The Dietary Guidelines for Americans, 2025–2030 recommends dairy foods as a key component of healthy diets across the lifespan. Milk and dairy foods provide high-quality protein and healthy fats to balanced eating patterns and have a complex matrix of nutrients and bioactive components that work in

unique ways to support health. The dairy matrix may help explain the link between eating dairy foods across the spectrum of fat levels and neutral to beneficial health outcomes like reduced risk of cardiovascular disease and type 2 diabetes.^{3,4} For children, a growing body of evidence finds that whole milk is not linked to obesity, and full-fat dairy may even have beneficial effects on body composition.^{5,6}

Flavored Milk Helps Increase Intake of Key Nutrients

The Dietary Guidelines and this final rule recommend reducing intake of added sugar but still allow flavored milk to be offered to children 6 years and older. Flavored milk has the same nutrients as unflavored milk, contributes only 4% of total added sugars in children's diets and is not associated with increased BMI.⁷ In California, flavored milk offered in schools was reformulated to reduce added sugars to within 7 to 8 grams, as reported by California school milk processors. In studies, students who chose flavored milk consumed an extra daily serving of dairy; had higher intakes of calcium, potassium, magnesium, phosphorus and vitamins A, D, B12 and B2; and also drank fewer soft drinks and fruit juice while consuming more protein, calcium and essential amino acids than non-milk drinkers.^{8,9} These findings reinforce the nutritional contributions of flavored milk in children's eating patterns and the overall positive impact on diet quality.

Recommendations for Consideration

Dairy Council of California supports the USDA's broader alignment across Child Nutrition Programs and the restoration of flexibility and expanded milk options consistent with the Whole Milk for Healthy Kids Act and the Dietary Guidelines. This allows students, operators and communities more flexibility in milk choices that may result in increased consumption of milk in young children and adolescents. We also encourage USDA to issue clear, detailed and coordinated guidance, along with ongoing monitoring to ensure positive nutrition and program outcomes.

About Dairy Council of California

Dairy Council of California is a science-based nutrition organization that collaborates with partners to elevate the health of children and communities through the pursuit of lifelong healthy eating patterns. Funded by California's dairy farm families and milk processors and under the guidance of the California Department of Food and Agriculture, Dairy Council of California's

registered dietitian nutritionists and experts in nutrition science, education, agricultural literacy and community health engage with partners in school, health care and community settings, working together to achieve nutrition security and optimal health. Each year these collective efforts improve access to nutritious foods and provide nutrition education and resources for millions of people in California and beyond, demonstrating the dairy community's contribution to sustainable nutrition and community health.

We appreciate the opportunity to submit these comments.

Sincerely,



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