June 8, 2026

School Meals Policy Division
Food and Nutrition Service
1320 Braddock Place
Alexandria VA 22314

RE: FNS- 2026-0067: Expanding Fluid Milk Options in Child Nutrition Programs, Final rule with comment period.

Dear Sir/Madam,

The International Dairy Foods Association (IDFA) and the National Milk Producers Federation (NMPF) are pleased to submit these comments in support of the recent final rule, "Expanding Fluid Milk Options in Child Nutrition Programs."

All fluid milk is a nutrient-rich core component of healthy diets, providing 13 essential nutrients for children who participate in the various nutrition programs administered by the U.S. Department of Agriculture (USDA). Whole (3.25% milkfat) and reduced-fat milk (2% milkfat) contain the same nutrients as all other fluid milk, including calcium, phosphorus, protein, vitamins A, D and B12, pantothenic acid, riboflavin, and niacin. Several of these nutrients are underconsumed by children.

Several recent research studies (including systematic reviews and meta-analysis) examining the effect of higher fat milk consumption found that it was associated with lower

childhood obesity and concluded that dietary guidelines that recommend only lower fat milk versions might not lower the risk of childhood obesity. [1,2,3,4, 5,6,7] One of these systematic reviews[8] also examined cardiometabolic health in children ages 2 to 18 years, in addition to adiposity, and concluded that full-fat dairy consumption was not associated with increased body weight, adiposity, or cardiometabolic risk in children.

As noted in the final rule, including full-fat and reduced-fat milk as options in all child nutrition programs aligns with the recommendations of the 2025-2030 Dietary Guidelines for Americans, which encourage dairy at all fat levels to help Americans meet their recommended daily intake of this food group. Ensuring consistency of milk options across all child nutrition programs will help school nutrition program operators by streamlining purchase procedures, rather than forcing operators to bid, purchase, store and make available different milk varieties during different eating occasions such as school breakfast and school lunch.

Consistency across child nutrition programs also aligns with Congressional intent when passing the Whole Milk for Healthy Kids Act. The Act mandates a variety of milk options in school lunch programs, including whole milk, flavored milk and lactose-free milk. The intent of Congress to apply this mandate across a wider range of child nutrition programs, including the School Breakfast Program, was confirmed via: bill language in the Fiscal Year

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[1] Vanderhout SM, Aglipay M, Torabi N, Jüni P, da Costa BR, Birken CS, O'Connor DL, Thorpe KE, and Maguire JL. Whole milk compared with reduced-fat milk and childhood overweight: a systematic review and meta-analysis. *Am J Clin Nutr* 2019;00:1–14.

[2] O'Sullivan TA, Schmidt KA, and Kratz M. Whole-Fat or Reduced-Fat Dairy Product Intake, Adiposity, and Cardiometabolic Health in Children: A Systematic Review. *Adv Nutr 2020;00:1–23*.

[3] Dougkas A, Barr S, Reddy S and Summerbell CD. A critical review of the role of milk and other dairy products in the development of obesity in children and adolescents. *Nutrition Research Reviews (2019), 32, 106–127*.

[4] Kang K, Sotunde OF, and Weiler HA. Effects of Milk and Milk-Product Consumption on Growth among Children and Adolescents Aged 6-18 Years: A Meta-Analysis of Randomized Controlled Trials. *Adv Nutr 2019;10:250-261*

[5] Vanderhout SM, Keown-Stoneman CDG, Birken CS, O'Connor DL, Thorpe KE, Maguire JL. Cow's milk fat and child adiposity: A prospective cohort study. Int J Obes (Lond). 2021;45:2623–2628. DOI: 10.1038/s41366-021-00948-6.

[6] McGovern C, Rifas-Shiman SL, Switkowski KM, Woo Baidal JA, Lightdale JR, Hivert MF, Oken E, Aris IM. Association of cow's milk intake in early childhood with adiposity and cardiometabolic risk in early adolescence. Am J Clin Nutr. 2022;116:561–571. DOI: 10.1093/ajcn/nqac103.

[7] Nicholl A, Deering KE, Evelegh K, et al. Whole-fat dairy products do not adversely affect adiposity or cardiometabolic risk factors in children in the Milky Way Study: a double-blind randomized controlled pilot study. Am J Clin Nutr. 2021;114(6):2025–2042. DOI: 10.1093/ajcn/nqab288.

[8] O'Sullivan TA, Schmidt KA, and Kratz M. Whole-Fat or Reduced-Fat Dairy Product Intake, Adiposity, and Cardiometabolic Health in Children: A Systematic Review. *Adv Nutr 2020;00:1–23*.

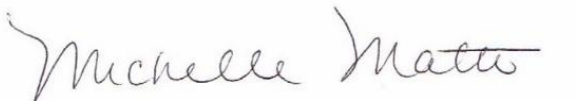
2027 Agriculture Appropriations bill (Section 754 of H.R. 8646[9]), which was passed by the U.S. House of Representatives on June 4, 2026; bill language in the Farm, Food, and National Security Act of 2026 (Section 12410 of H.R. 7567)[10], which was passed by the U.S. House of Representatives on April 30, 2026; and other correspondence from the sponsors of the Act.

Regarding flavored milk, studies conducted in children and adolescents indicate that flavored milk consumption is associated with overall enhanced diet quality and is not associated with the risk of adverse weight gain.[11] When schools can offer children the milk varieties they are served at home and prefer, consumption may increase and lead to lifelong consumption.

A variety of milk options is popular with parents of school-age children. According to a recent survey of parents of school-age children conducted by IDFA and Morning Consult, 59% of parents say they would be more likely to have their children participate in school meals if whole and reduced-fat milk were available as part of those meals. This same survey showed that 77% of parents support flavored milk being available in school meals.

IDFA and NMPF applaud USDA for supporting child nutrition by allowing for a variety of milk options that can help schools, families and children access their preferred type of milk, including whole or reduced fat varieties. This will assist children in meeting their dairy intake recommendations and intakes of milk's 13 essential nutrients.

Sincerely,



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Vice President, Regulatory Affairs and Nutrition
International Dairy Foods Association



Miquela L. Hanselman, MPH
Sr. Director, Regulatory Affairs
National Milk Producers Federation

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[9] Section 754 of the bill text for H.R. 8646: https://www.congress.gov/bill/119th-congress/house-bill/8646

[10] Section 12410 of the bill text for Farm, Food, and National Security Act of 2026 (H.R. 7567): https://www.congress.gov/119/bills/hr7567/BILLS-119hr7567eh.pdf

[11] Murphy MM, Douglass JS, Johnson RK, Spence LA. Drinking Flavored or Plain Milk Is Positively Associated with Nutrient Intake and Is Not Associated with Adverse Effects on Weight Status in US Children and Adolescents. *J Am Diet Assoc*. 2008;108(4):631-639. doi:10.1016/j.jada.2008.01.004

The International Dairy Foods Association (IDFA), Washington, D.C., represents the nation's dairy manufacturing and marketing industry, which supports more than 3 million jobs that generate $198 billion in wages and $779 billion in overall economic impact. IDFA's diverse membership ranges from multinational organizations to single-plant companies, from dairy manufacturers and cooperatives to food retailers and suppliers, all on the cutting edge of innovation and sustainable business practices. Together, they 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 offer unparalleled health and consumer benefits to people of all ages.

The National Milk Producers Federation's (NMPF) member cooperatives represent 20,000 U.S. dairy producers, who collectively produce two-thirds of the nation's milk supply. Since our founding in 1916, NMPF has been dedicated to representing dairy farmers and their cooperatives in national policy discussions that affect the future of U.S. agriculture and public health.