



March 17, 2025
Tameka Owens
Acting Administrator and Assistant Administrator
Child Nutrition Programs, USDA Food and Nutrition Service
Braddock Metro Center II, 1320 Braddock Place
Alexandria, VA 22314

RE: Request for Information: Grain-Based Desserts and High-Protein Yogurt Crediting in Child Nutrition Programs
FNS-2024-0040-0001

Dear Tameka,

The National CACFP Association (NCA) thanks you for the opportunity to provide information on Grain-Based Desserts and High-Protein Yogurt in Child Nutrition Programs (CNPs), specifically the Child and Adult Care Food Program (CACFP).

Both sponsoring organizations (sponsors) and program operators recognize the value of the CACFP and the impact it has on the growth and development of children and the quality of child care overall. The CACFP meal pattern ensures that participants receive nutritious meals and snacks and has proven to increase the consumption of milk, vegetables, meat, eggs and whole grains. Operators of the CACFP also recognize the importance of reducing added sugars in the food program.

The CACFP meal patterns were updated in the last child nutrition reauthorization to align with the Dietary Guidelines for Americans in 2010. This resulted in a healthier meal pattern, which NCA strongly supports. However, sponsors and operators have since been met with an increased administrative burden in the CACFP, especially in the area of meal pattern documentation. CACFP regulations require meals and snacks served in the food program to be documented to demonstrate compliance with the meal pattern. While current USDA regulations only require operators to keep records of menus, they do give States the authority to determine and require other types of acceptable record-keeping documents. This has resulted in numerous state-level requirements for meal pattern documentation which has put a significant burden on both sponsors and program operators. Thus, leaving program operators frustrated and expressing the food program is "just not worth it anymore."

NCA gathered feedback for this RFI through interviews, research, a listening session and a survey of our board members. Overall, NCA urges USDA to avoid creating regulations that further complicate the program and increase the administrative burden on sponsors and program operators, while also considering policies that offer flexibilities to address the needs of every type of CACFP site.

Section I. Grain-Based Desserts

Part A. Current Policies and Potential Alternatives for Grain-Based Desserts

In several CACFP studies, the administrative burden of the program has been identified as a barrier to participation or the reason program operators decide to stop participation in the food program. NCA opposes the addition of regulations which would require weekly calculations or complicated nutrition analysis for an entire component group.

1. What challenges do Program operators face in identifying grain-based desserts, under the current policies?

Program operators have shared that identifying grain-based desserts can be challenging, time-consuming and confusing. Some of their feedback to NCA included:

- Some items considered grain-based desserts in the CACFP are considered creditable grain items in other child nutrition programs, such as NSLP, SBP, and SFSP, leading to confusion for both staff and participants, especially for those who operate more than one CNP.
- Foods with similar added sugars and ingredients differ in crediting – one might be creditable while the other is classified as a grain-based dessert. For example, a gingerbread that is low in added sugars is not creditable in the CACFP, yet other quick breads are creditable.
- The ongoing introduction of products by food manufacturers under names such as “crackers”, “biscuits”, “bites”, “rounds”, “minis” and “sticks” that may be similar to sweet crackers in nutrition, in fact may even have less sugar than an animal cracker, creates confusion amongst operators. Furthermore, the crediting determination of these kinds of products varies across States and even among reviewers/monitors. Thus, program operators are at risk of being issued a finding if they choose to serve these products.
- Some items in the grain-based dessert category can be made healthier with scratch cooking, such as granola bars and cereal bars, by controlling the amount of added sugars. An example is a popular snack called “Energy Bites”, which are made with raw oatmeal, nut/seed butter and fresh or dried fruit formed into balls or squares. Some monitors might classify these in the category for granola bars, cereal bars, and breakfast bars and therefore they would not credit in the CACFP, despite being nutritious and having very small amounts, if any, of added sugars.
- The process of identifying all items that are grain-based desserts and ensuring that they are not included in meal plans can be challenging and time-consuming. This task requires thorough knowledge and careful attention to detail to maintain compliance with the CACFP meal pattern. Additionally, due to the subjective and non-defined nature of grain-based desserts, there remains uncertainty when menu planning even with the best intentions.

3. Should FNS adjust its current grain-based desserts policies, such as changing which grain products are categorized as grain-based desserts?

NCA recommends FNS explore re-categorizing the cereal bars, breakfast bars, and granola bars category to allow them to be creditable in the CACFP. FNS currently recommends that program operators “should consider the common perception of the food item” when determining whether they credit in the CACFP. Cereal bars, breakfast bars, and granola bars are not commonly perceived as desserts.

Re-categorizing cereal bars, breakfast bars, and granola bars would create more consistency across CNPs as these items are already creditable in NSLP in a certain amount per week, SBP without restriction, and SFSP at snack and breakfast. Allowing these items to credit in the CACFP would allow for more flexibility in menus. Specifically, program operators serving shelf-stable meals would benefit from this change. If bars are re-categorized, several approaches could be considered:

- Limiting their use to a certain meal occasion (Breakfast or Snack)
- Require an added sugar limit for commercially prepared products similar to that required for ready-to-eat breakfast cereals.
- Allowing homemade food items made with whole or enriched grains, for example cereal grains in Group H, and other creditable ingredients to be creditable in the CACFP.

Part B. Input on Grains High in Added Sugars

1. Should FNS consider alternative approaches to its current grain-based desserts policies, such as replacing these policies with limits for “grains high in added sugars”?

NCA does not recommend any alternative approaches to current grain-based desserts policies.

2. If FNS were to establish limits for “grains high in added sugars,” how should the limits be established?

FNS should not establish limits for “grains high in added sugars” for the CACFP.

2a. Should FNS adopt FDA's definition for “high” for nutrient content claims used on food labels to define “grains high in added sugars”? What are the benefits or limitations of this approach?

No, FNS should not adopt FDA's definition for “high” for nutrient content claims used on food labels.

Operators have shared that if they were merely required to identify the *% Daily Value* or number of grams of added sugar on a nutrition facts label and verify that it was below 20% or 10 grams respectively, that this could simplify the process for identifying creditable items. However, as *% Daily Value* is relative to the serving size listed on the nutrition facts label, and because serving sizes vary by item, calculations would be needed to determine the amount of added sugars per required minimum serving size in the CACFP. This would cause greater complication and time consumption for operators to identify creditable grain items.

This approach could lead to the food industry adjusting the serving sizes listed on their packaging in order to ensure they are within the added sugar limit for CACFP. This could also increase the daily intake of added sugar in young children.

2b. What opportunities and challenges could arise from having different limits for grains offered to children ages one through three, versus children and adults ages four and older?

Currently, the only added sugar limits in the CACFP, for breakfast cereals and yogurts, are consistent across all age groups.

FNS should never create any policies that do not align with the current age groups as outlined in the meal patterns (infant, 1–2 year olds, 3-5 year olds, 6-12 year olds, 13-18 year olds and adults).

Having different added sugar limits for age groups that do not align with those in the CACFP would essentially double the administrative burden of every child care provider serving infants, toddlers, and pre-school children.

Not only would this cause confusion for Program operators that could result in numerous findings and meal disallowances, but it would also significantly increase the administrative burden of the sponsoring organization or state agency providing technical assistance and monitoring claims.

2c. What other approaches should FNS consider to define “grains high in added sugars”?

NCA does not recommend any alternative approaches to current grain-based desserts policies.

Section II. High-Protein Yogurt Crediting

Part A. Current Policies

1. Are Program operators currently offering Greek or Greek-style yogurt, or other types of yogurt that contain more protein than regular yogurt, as part of reimbursable meals or snacks?

Yes, one-third of operators surveyed by NCA currently offer Greek or Greek-style yogurt as part of a reimbursable meal or snack.

1a. To which age groups and in which meals are these types of yogurt offered?

Stakeholders represented all ages of the CACFP. While yogurt is a popular meat/meat alternate, and often served at breakfast and snack, we do not believe that high-protein yogurt is chosen based on participant age or meal type.

1b. How frequently are these types of yogurt offered?

Stakeholders did not report serving Greek or Greek or Greek-style yogurt often. We believe that generally, program operators have a preferred yogurt brand and serve that consistently in their meals. So, if a program operator serves high-protein yogurt at all, they serve it consistently.

1c. Are these types of yogurt popular with participants? Are they more popular than regular yogurt?

CACFP stakeholders responded that they more often serve regular yogurt due to affordability and participant preference.

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?

The primary reason that program operators are not offering Greek or Greek-style yogurt is because it is too expensive. Some operators also shared that when they have offered Greek or Greek-style yogurt, their participants have not liked it and therefore they do not serve that type of yogurt.

Part B. Potential Alternatives

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?

No, FNS should not create a separate crediting standard for high-protein yogurt that is different from regular yogurt. Asking operators to calculate protein content in addition to added sugars would be too complicated and unnecessary. Having two crediting standards for one product type (yogurt) would confuse operators when all other products have a singular crediting standard. This could also cause further confusion when it comes to other products that claim to be high-protein, such as pastas, cereals, and pancake mixes.

NCA does not support lowering the serving size for high-protein. It is important to not only consume nutritious foods, but to ensure the calorie intake is appropriate for the age group. At times, the meals provided in care are the only meals they might receive.

2. If high-protein yogurt contributes differently to the CNP meal patterns than regular yogurt, how should high-protein yogurt be credited? Be as specific as possible, such as the volume or weight needed.

FNS should not establish different crediting standards for high-protein yogurt and regular yogurt in the CACFP.

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?

No, FNS should not allow high-protein yogurt to credit different than regular yogurt and also should not adopt the FDA's definition of "high" for nutrient content claims.

3a. What are the benefits or limitations of this approach?

The addition of another calculation for yogurt (on top of added sugars) would likely prevent operators from serving yogurt products altogether.

3b. 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?

Similar to "grains high in added sugars" having different limits for yogurts offered to children ages one through three versus children and adults ages four and older could cause confusion and complication for providers who serve multiple age groups, when they are able to serve a certain yogurt product to children 4 and older, but not those one to three years old. In addition, 3-, 4- and 5-year-olds are all in the same age group for the CACFP, but 3-year-olds would have a different added sugar limit than 4- and 5-year-olds under this circumstance. Therefore, if a high-protein definition were created for yogurt, there should be one definition that is consistent across all age groups.

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?

FNS should not allow high-protein yogurt to credit differently in the CACFP.

4a. Should changes be limited to any specific type of high-protein yogurt?

No, FNS should not allow high-protein yogurt to credit differently in the CACFP regardless of specific type.

4b. Should yogurt that is thickened by adding thickening agents (e.g., polysaccharides or optional dairy ingredients) credit differently in CNPs? If yes, what implications might that approach have on the requirement for Program operators to plan CNP menus using food-based menu planning?

No, yogurt that is thickened by adding thickening agents should not credit differently in CNPs.

4c. Should changes include plant-based yogurt alternatives (e.g., soy-based yogurt alternatives)?

FNS should not make any changes to yogurt crediting in the CACFP. Any changes that are made to dairy yogurt should also be applied to plant-based yogurt alternatives for consistency within the program.

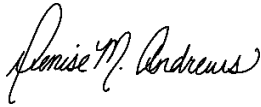
5. What other approaches should USDA consider for how to define and credit high-protein yogurt?

NCA does not recommend any alternative approaches to defining and crediting high-protein yogurt.

In closing, NCA appreciates the opportunity to provide comments on crediting grain-based desserts and high-protein yogurt in the CACFP. We welcome the opportunity to work together to further explore improvements in the CACFP.

On behalf of the entire board and members of our association, thank you for requesting insight from the CACFP community on these important decisions.

Sincerely,



Denise Andrews
Board Chair



Lisa Mack
President & CEO