

May 16, 2023

School Meals Policy Division
Food and Nutrition Service
P.O. Box 9233
Reston, Virginia 20195

Re: Docket No. FNS–2022–0043—Child Nutrition Programs: Revisions to Meal Patterns
Consistent With the 2020-2025 Dietary Guidelines for Americans

To Whom It May Concern:

On behalf of our 159,000 members, we would like to comment on the Food and Nutrition Service's proposal to better align the nutrition standards for federal school meal programs with the current *Dietary Guidelines for Americans*. We offer these comments in response to your Federal Register notices of February 7, 2023 (88 FR 8050) and March 31, 2023 (88 FR 19229).

The National School Lunch Program and School Breakfast Program enable public schools, nonprofit private schools, and residential child care institutions to offer free and reduced-price meals to eligible children. Eligibility is based on household income or meeting other categorical requirements. The programs are designed to improve vulnerable children's nutrition while also supporting the U.S. agriculture industry.

Current regulations allow schools to serve some menu items and meals that are high in added sugars, provided they meet weekly calorie limits. FNS has now determined that calorie limits alone are not enough to meet the *Dietary Guidelines* recommendations for limiting children's intake of added sugars to less than 10 percent of calories per week.

FNS is proposing to establish quantitative limits for leading sources of added sugars in school meals, including grain-based desserts, breakfast cereals, yogurts, and flavored milks. Specifically, the proposal would:

- Limit grain-based desserts to having no more than 2-ounce equivalents per week in school breakfast.
- Limit breakfast cereals to having no more than 6 grams of added sugars per dry ounce.
- Limit yogurt to no more than 12 grams of added sugars per 6 ounces.
- Limit flavored milk offerings in elementary schools to no more than 10 grams of added sugars per 8 fluid ounces
- Limit flavored milk sold as a competitive food for middle and high schools to 15 grams of added sugars per 12 fluid ounces.

FNS is also proposing to implement a dietary specification limiting added sugars to less than 10 percent of calories per week in the school lunch and breakfast programs. This weekly limit would be in addition to the product-based limits.

From a dental perspective, no amount of sugar can be consumed without increasing the risk for tooth decay. Sugar increases the build-up of plaque (a sticky, colorless, bacterial film), which weakens enamel and can potentially form a cavity. This applies regardless of whether the sugar is natural or added.

We recognize that it is neither practical nor possible to remove all sugary foods from the human diet, or to classify some nutrient rich foods as being unhealthy based on sugar content alone. Even milk has a measurable amount of sugar. However, it is both practical and possible to encourage good eating habits, which would necessarily include limiting sugar consumption. We stand ready to help make that happen.

We are pleased to support your proposal to reduce added sugar consumption by those participating in federal school meal programs. It will not end diet-related tooth decay, but it is an important step in that direction.

Thank you for providing us the opportunity to comment. If you have any questions, please contact Mr. Robert J. Burns at 202-789-5176 or burnsr@ada.org.

Sincerely,

/s/

George R. Shepley, D.D.S.
President

GRS:RAC:rjb

/s/

Raymond A. Cohlma, D.D.S.
Executive Director