



## Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans

*Summary and Overview of Final Rule Released April 24, 2024*

### Overview

The Food and Nutrition Service (FNS) has [issued](#) a [final rule](#) that makes changes to meal patterns in the National School Lunch Program (NSLP), School Breakfast Program (SBP) and Child and Adult Care Food Program (CACFP). For dairy foods, the final rule will permit low-fat and non-fat flavored milk to be served at all grade levels; introduce product-specific limits on added sugars in milk and yogurt; limit calories from added sugars to 10% of total calories across the week; require reductions in sodium that are more modest than some earlier targets; and make it easier for schools to offer meats/meat alternates at breakfast, such as cheese and yogurt.

### Guiding Principles

In its earlier (February 7, 2023) [proposed rule](#), USDA laid out several principles that guided development of the rule:

- To “further align school meal nutrition standards with the goals of the *Dietary Guidelines [for Americans], 2020-2025*,”
- To “develop standards that improve the nutritional quality of school meals based on the latest nutrition science,”
- To establish rules “that are durable and built to last,” and
- To craft rules that “result in meals children will enjoy.”

### Dairy Provisions

- **Flavored Milk**
  - The final rule allows low-fat and fat-free flavored or unflavored milk to be served at all grade levels and sold a la carte. (Note: One of two options outlined in the proposed rule would have limited flavored milk to upper grades, but FNS did not adopt this option.)
  - Schools must offer at least two varieties of milk, and at least one variety must be unflavored.
  - For CACFP, flavored milk can only be offered to children 6 and older and to adults; this is not a change from existing regulations.
- **Added Sugars**
  - Beginning in school year (SY) 2025-26:
    - [Flavored milk](#) may contain no more than 10 grams of added sugar per 8 fluid ounces (or if sold a la carte to upper grades, 15 grams per 12 ounces).

- Yogurt may contain no more than 12 grams of added sugars per 6 ounces. This is a new requirement for NSLP and SBP; and for CACFP replaces an existing limit of 23 grams of *total* sugar per 6 ounces.

Beginning in SY 2027-28:

- Added sugars from all sources in meals served (averaged over a week) must be no more than 10% of calories, as recommended in the Dietary Guidelines for Americans (DGA), for both the NSLP and SBP.
- **Sodium**
  - Current limits on sodium content in all meals averaged over a week will remain in effect until SY 2027-28, when limits will be reduced by 15% for the NSLP and 10% for the SBP.
  - The levels of sodium allowed at that point will equate to those in “Target 2” in USDA’s original school meal rule published in 2012.
- **Meats/Meat Alternates**
  - For the SBP, the current minimum daily grain requirement is removed, making it easier for schools to substitute a meat/meat alternate for a grain at breakfast (alternates include both cheese and yogurt).
  - Offering meats/meat alternates remains voluntary in the SBP.
- **Substitute Beverages**
  - Nutrient requirements (to be considered equivalent to milk) are unchanged, but the units of measurement for vitamins A and D are modernized.

### Non-Dairy Provisions

The added sugars and sodium limits described above will affect all foods in the school meal programs, not just dairy foods. Highlights of other provisions that will affect non-dairy foods include the following:

- **Breakfast cereals** will have a product-specific added sugars limit of 6 grams per dry ounce, effective in SY 2025-26.
- **Whole grains** will continue to be offered under requirements that 80% of weekly grains offered must be whole-grain rich. (Whole-grain rich products must contain at least 50% whole grains.)
- The final rule codifies the ability of schools to offer **traditional indigenous foods** and permits substitution of vegetables for grains in tribally-operated schools and CACFP sites.
- **Beans, peas and lentils** will continue to count as meats/meat alternates and will also count toward the vegetable subgroup requirement for these foods.
- **Registered dietitians** will be added to the list of health care professionals able to write medical statements for meal modifications.
- Schools may offer **water** with added fruits or vegetables in addition to plain water, but may not offer them *instead* of plain water.

### Implications for Dairy Consumption

National Dairy Council (NDC) and state and regional dairy councils have supported nutrition education in schools for more than a century, encouraging consumption of nutrient-dense foods that meet students’

nutritional needs. The final rule may afford several opportunities for NDC, local dairy councils and other segments of the dairy community to encourage more consumption of healthy, delicious dairy foods.

- **School Menu Decisions**
  - To meet added sugars and sodium standards, many schools will need to modify current menus.
  - Some foods and beverages currently served with added sugars also have high nutrient density (e.g., milk and yogurt). Other foods with added sugars are substantially less nutrient-dense. Schools could choose to achieve added sugar reduction by cutting back on items that are less nutrient-dense than dairy foods.
  - NDC and local dairy councils can provide important and objective nutritional information in this regard, as well as menu and recipe ideas.
  
- **Lactose-Free Dairy Milk or Lactose-Reduced Dairy Options**
  - Lactose intolerance is a real condition impacting some students and may disproportionately affect students of color.
  - A recent series of scientific articles published by the National Medical Association, the nation's largest association of Black physicians, re-emphasized the importance of dairy foods in addressing health disparities in communities of color, and stressed the role of lactose-free milk and other dairy foods that naturally contain less lactose, like fermented dairy foods (e.g., cheese and yogurt). (1)
  - With the role of milk remaining central under the final rule, there are opportunities to educate students and school nutrition professionals on lactose-free dairy milk and lower-lactose fermented dairy foods like cheese and yogurt.
  - Likewise, there are opportunities for milk processors to make lactose-free dairy milk more widely available to schools in portion sizes and packaging that best fit students' needs.
  
- **Low-Fat Flavored Milk**
  - Children who drink flavored milk have favorable nutrition adequacy and health outcomes. This includes above median consumption of dairy foods during adolescence (2), higher consumption of micronutrients (3-9) and neutral to beneficial outcomes on overweight or obesity (10-13) compared to those who do not drink flavored milk.
  - In addition, some studies have shown adverse effects on average daily participation (ADP) in meal programs when flavored milk is removed (14).
  - NDC and dairy councils can continue to educate school nutrition professionals and health & wellness thought leaders on the role of flavored milk in school meal programs.
  
- **Meats/Meat Alternates in SBP**
  - Because a meat/meat alternate is optional in the SBP, costs are a factor in whether schools offer the products. The costs of the meats/meat alternates themselves are not affected by the final rule, but by eliminating the fixed cost of serving at least one grain with each breakfast, the rule may make it easier to offer cheese, yogurt and other foods in the category.
  - Educating schools about their options and potential recipes could encourage them to offer more nutritious protein foods.

- **Reformulation & Regulatory Stability**

- Food manufacturers who supply schools will have incentives to provide choices that will make it simpler to meet the 10% added sugars limit. As noted above, FNS previously stated that it intended to write rules “that are durable and built to last.”
- By phasing in its requirements over several years, the final rule provides visibility into what the menu regulations will be for an extended period.
- The stability of regulatory requirements may give food manufacturers and dairy processors greater confidence in their ability to develop and promote products for the school market.
- NDC and dairy councils have opportunities to work cooperatively with manufacturers and schools to encourage the inclusion of dairy foods in menus to better meet students’ nutrient needs and encourage healthy diets.

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