

# Meal Pattern Changes

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**Issue Number:** CNU E-Memo 02-2025

**Correspondence Date:** 07/03/2024

**Regulatory Authority:** 7 CFR 210, 7 CFR 220

**Response Required:** No

**Attention:** Superintendents, Child Nutrition Directors and Managers, Menu planners

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The purpose of this memo is to inform districts of the United States Department of Agriculture (USDA), Food and Nutrition Service (FNS) published final rule titled, [\*Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans\*](#). While this rule is effective July 1, 2024, USDA is gradually phasing in required changes. School food authorities (SFA) are not required to make any changes as a result of this rule until school year 2025-2026 (beginning July 1, 2025) at the earliest.

Details of the changes are listed below:

## **Definitions/Terminology:**

**Whole Grains:** The final rule added a definition of “whole grain-rich” in Federal regulations to clarify that: Whole grain-rich is the term designated by FNS to indicate that the grain content of a product is between 50 and 100 percent whole grain with any remaining grains being enriched.

**Legumes (Beans and Peas):** The final rule changes the name of the Legumes (Beans and Peas) vegetable subgroup to Beans, Peas, and Lentils.

**Water:** The final rule adds the word “plain” to the regulation. Schools may offer potable water with added fruits, vegetables, and herbs in addition to but not instead of plain water during meal service.

**Buy American:** The final rule provides a definition of “substantially” using agriculture commodities that are produced in the United States to mean that over 51 percent of a food product must consist of agricultural commodities that were grown domestically.

**Added Sugar:**

The final rule establishes the following added sugars limits in the school lunch and breakfast programs (K-12). Product-based limits must be implemented by school year 2025-2026 (beginning July 1, 2025):

- Breakfast cereals may have no more than 6 grams of added sugars per dry ounce.
- Yogurt may have no more than 12 grams of added sugars per 6 ounces (2 grams of added sugars per ounce).
- Flavored milk may have no more than 10 grams of added sugars per 8 fluid ounces or, for flavored milk sold as a competitive food for middle and high schools, 15 grams of added sugars per 12 fluid ounces.

In addition to product-based limits described above, the final rule also establishes a dietary specification limiting added sugars to less than 10 percent of calories across the week in the school lunch and breakfast programs. Weekly dietary limits to be implemented by school year 2027-2028 (beginning July 1, 2027).

The final rule establishes consistency between the School Breakfast Program (SBP) and National School Lunch Program (NSLP) and the child and adult food care program (CACFP) Product-based limits to be implemented by October 1, 2025:

- Breakfast cereals may have no more than 6 grams of added sugars per dry ounce.
- Yogurt may have no more than 12 grams of added sugars per 6 ounces (2 grams of added sugars per ounce).

**Artificial Trans Fats:**

The final rule removes the dietary specification prohibiting artificial trans fats in the SBP, NSLP and smart snacks.

**Meal Modifications:**

The final rule makes clear in regulations the existing policy guidance that State licensed healthcare professionals may write medical statements to request meal modifications on behalf of a participant with disabilities in the NSLP, SBP, and CACFP. The final rule expands the authority to write medical statements to registered dietitians.

**Sodium:**

The final rule gradually reduces sodium in school meals. The sodium target will remain unchanged (Sodium Target 1A for lunch and Sodium Target 1 for breakfast) until June 30, 2027. Beginning in school year 2027-2028 (beginning July 1, 2027), schools will implement sodium reductions as noted in the chart below. These limits apply to the average amount of sodium in lunch and breakfast menus offered during a school week.

### National School Lunch Program Sodium Limits

Age/Grade Group	Current Sodium Limit: In place through June 30, 2027	Sodium Limit: Must be implemented by July 1, 2027
Grades K-5	≤ 1,110 mg	≤ 935 mg
Grades 6-8	≤ 1,225 mg	≤ 1,035 mg
Grades 9-12	≤ 1,280 mg	≤ 1,080 mg

### School Breakfast Program Sodium Limits

Age/Grade Group	Current Sodium Limit: In place through June 30, 2027	Sodium Limit: Must be implemented by July 1, 2027
Grades K-5	≤ 540 mg	≤ 485 mg
Grades 6-8	≤ 600 mg	≤ 535 mg
Grades 9-12	≤ 640 mg	≤ 570 mg

#### Meat/Meat Alternate

The final rule establishes a combined grains and meats/meat alternates meal component in the SBP and removes the requirement for schools to offer 1oz equivalent of grains each day at breakfast. This will allow schools to offer grains, meats/meat alternates, or a combination to meet the minimum ounce equivalent in this combined meal component requirement.

#### Nuts and Seeds: :

The final rule allows nuts and seeds to be credited for the full meats/meat alternates component in all meals (breakfast, lunch, supper and snack). When offering nuts and seeds, schools may choose to offer them to meet the full component or a portion of it, alongside other meats/meat alternates.

#### Vegetables:

The final rule continues to allow schools to substitute vegetables for fruits in the SBP. Under this rule the following will apply beginning in school year 2025-2026 (beginning July 1, 2025):

- Schools choosing to offer vegetables for fruit at breakfast one day per week have the option to offer a vegetable from any of the vegetable subgroups.
- Schools choosing to substitute vegetables for fruit at breakfast on two or more days per week are required to offer vegetables from at least two different subgroups.

The final rule allows schools to count beans, peas, and lentils offered as meats/meat alternates in the NSLP toward the weekly beans, peas, and lentils vegetable subgroup requirement. When offering beans,

peas, and lentils as meats/meat alternates, schools may only count those items toward one meal component daily: either the meats/meats alternate component or the vegetables component. When schools offer beans, peas, and lentils as meat alternates, they are still required to offer additional vegetables to meet the daily and weekly vegetable meal component requirements.

#### **Smart Snacks:**

The final rule adds bean dip to the list of foods exempt from the total fat standard in the Smart Snacks regulations. Bean dip will continue to be subject to all other Smart Snacks requirements. This exemption applies to bean dips made from any variety of beans, peas, or lentils.

#### **Professional Standards:**

The final rule allows State agencies the discretion to approve the hiring of a Child Nutrition Director with 10 or more years of school nutrition program experience but who does not hold a bachelor's or an associate degree to serve as a director in a medium (student enrollment of 2,500-9,999) or large (student enrollment of 10,000 or more) local educational agency. Directors hired under this exception must have a high school diploma or GED.

#### **Geographic Preference:**

The final rule allows "locally grown," "locally raised," or "locally caught" as procurement specifications for unprocessed or minimally processed food items. The final rule continues to allow schools to create or adopt their own definition of local for the procuring local foods.

#### **Buy American:**

The final rule adds the limited exceptions to the Buy American requirements related to product availability and/or cost to the regulations. The final rule requires schools to maintain documentation to demonstrate the use of exceptions and allows schools to utilize an exceptions list when products are not available in sufficient and reasonably available quantities in the U.S. Schools must also include the Buy American requirements when making purchases and entering contracts for food used in the SBP and NSLP, beginning July 1, 2024.

The rule also implements a cap on the amount of non-domestic food purchases a school may make when utilizing the exceptions, beginning in school year 2025-2026 (July 1, 2025).

- 10 percent cap on non-domestic food purchases beginning in school year 2025-2026 (July 1, 2025).
- 8 percent cap beginning in school year 2028-2029 (July 1, 2028).
- 5 percent cap beginning in school year 2031-2032 (July 1, 2031).

Lastly, the final rule outlines in regulations the statutory requirements for fish and fish products to be compliant with Buy American requirements, requiring that farmed fish must be harvested within the United States or any territory of possession of the United States. Wild caught fish must be harvested within the Exclusive Economic Zone of the United States or by a United States flagged vessel.

If you have any questions, please contact your Area Specialist at 501-324-9502.