

**USDA ISSUES FINAL RULE UPDATING SCHOOL NUTRITION STANDARDS  
APPENDIX**

<b>Provision</b>	<b>Current Transitional Standard</b>	<b>New Standards Requiring Compliance in 2025-2026 School Year<sup>1</sup></b>
<b>Added Sugars</b>	<ul style="list-style-type: none"> <li>• None</li> </ul>	<ul style="list-style-type: none"> <li>• Product-based limits for breakfast cereals, yogurts, and flavored milks, effective in school year (SY) 2025-26.<sup>2</sup></li> <li>• Added sugars must average less than 10% of calories across the weekly menu, effective SY 2027-28.</li> </ul>
<b>Milk</b>	<ul style="list-style-type: none"> <li>• Allows flavored and unflavored for all grades K-12 (only fat-free and low-fat milks are allowed).</li> <li>• Requires unflavored milk to be offered at each school meal service.</li> <li>• Regulations affected: 7 CFR 210.10(d)(1)(i) and 220.8(d)</li> </ul>	<ul style="list-style-type: none"> <li>• Continue to allow flavored and unflavored milks for all grades (K-12).</li> <li>• However, all milk offered to K-12 students must comply with the new product-based added sugars limits.</li> </ul>
<b>Grains</b>	<ul style="list-style-type: none"> <li>• Requires at least 80% of the weekly grains offered to be whole grain-rich; remaining grain items offered must be enriched.</li> <li>• Regulations affected: 7 CFR 210.10(c)(2)(iv) and 220.8(c)(2)(iv)</li> </ul>	<ul style="list-style-type: none"> <li>• Keep the current standard.</li> <li>• USDA added a definition of “whole grain-rich” 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.”</li> </ul>
<b>Sodium</b>	<ul style="list-style-type: none"> <li>• Meet Sodium Target 1<sup>3</sup> for school breakfast and lunch (and Target 1A<sup>4</sup> for school lunch-only by school year 2023-24).</li> <li>• Regulations affected: 7 CFR 210.10(c) and (f)(3); 220.8(c) and (f)(3)</li> </ul>	<ul style="list-style-type: none"> <li>• School breakfast – one reduction (10%) by SY 2027-28.<sup>5</sup></li> <li>• School lunch – one reduction (15%) by SY 2027-28.<sup>6</sup></li> </ul>
<b>NSLP Afterschool Snacks</b>	<ul style="list-style-type: none"> <li>• NSLP afterschool snacks must contain two of the following four components: milk, meat/meat alternate, vegetable or fruit, or a serving of bread or equivalent.</li> <li>• Regulations affected: 7 CFR 210.10(o)</li> </ul>	<ul style="list-style-type: none"> <li>• Aligns NSLP afterschool snack standards with the Child and Adult Care Food Program (CACFP) snack standards, which require snacks to include two of the following five components: milk, vegetables, fruits, grains, or meat/meat alternate.</li> <li>• Makes fruit and vegetables two separate components, rather than being combined as one.</li> <li>• Applies other CACFP snack nutrition requirements to NSLP snacks to align with statute.</li> <li>• Does not change requirements for afterschool snacks served to preschoolers.</li> </ul>
<b>Substituting Vegetables for Fruits at Breakfast</b>	<ul style="list-style-type: none"> <li>• Schools can substitute vegetables for fruits at breakfast, provided that there are at least two cups per week from the dark green, red/orange, beans and peas, or other vegetable subgroups on the menu that week. However, schools are currently allowed by law to substitute any vegetable, including starchy vegetables, for fruits at breakfast.</li> <li>• Regulations affected: 7 CFR 220.8(c)</li> </ul>	<ul style="list-style-type: none"> <li>• Adds starchy vegetables to the list of vegetable subgroups.</li> <li>• Schools that substitute vegetables for fruits at breakfast one day per school week have the option to offer a vegetable from any of the five vegetable subgroups.</li> <li>• Schools that substitute vegetables for fruits at breakfast two or more days per school week are required to offer vegetables from at least two of the five different vegetable subgroups throughout the week.</li> </ul>
<b>Nuts and Seeds</b>	<ul style="list-style-type: none"> <li>• Nuts and seeds can be served as a meat/meat alternate, but only credit towards 50% of the component at breakfast, lunch, and supper, and must be served alongside another meat/meat alternate.</li> <li>• Regulations affected: 7 CFR 210.10(c)(2)(iii)(C), 220.8(c)(2)(i)(B), 225.16(e)(5), 226.20(a)(5)(ii), and 226.20(c)(2)</li> </ul>	<ul style="list-style-type: none"> <li>• Allows nuts and seeds to receive credit for 100% of the meat/meat alternate component in all child nutrition programs and meals, including snacks.</li> </ul>

<b>Competitive Foods (Smart Snacks) – Bean Dip Exemption</b>	<ul style="list-style-type: none"> <li>Competitive foods must meet nutrient standards for calories, sodium, fats, and total sugars at 7 CFR 210.11(f).</li> <li>Total fat content of a competitive food must not exceed 35% and saturated fat must be less than 10% of total calories, though there are some exceptions.</li> </ul>	<ul style="list-style-type: none"> <li>Keeps the current competitive food nutrient standards for calories, sodium, fats, and total sugars.</li> <li>Adds bean dips to the list of foods exempt from the total fat standard in the regulations, allowing bean dips to be sold as a Smart Snack. The exemption applies to products marketed as hummus as well as bean dips made from any type of bean, pea, or lentil.</li> <li>Bean dip will continue to be subject to the saturated fat standard for Smart Snack, as well as other Smart Snack requirements.</li> </ul>
<b>Buy American</b>	<ul style="list-style-type: none"> <li>School food authorities must purchase domestic commodities or products to the maximum extent practicable.</li> <li>Two limited exceptions, related to product availability and cost, are provided in guidance.</li> <li>Regulations affected: 7 CFR 210.21(d) and 220.16(d)</li> </ul>	<ul style="list-style-type: none"> <li>Phases in a limit on non-domestic food purchases when a school food authority utilizes an exception, beginning with a 10 percent cap in SY 2025-26, an 8 percent cap in SY 2028-29, and concluding with a 5 percent cap in SY 2031-32.</li> <li>Updates federal regulations to include the exceptions related to product availability and cost that are currently only provided in guidance. <ul style="list-style-type: none"> <li>School food authorities need to maintain documentation showing the use of the exceptions.</li> <li>School food authorities are required to include the Buy American provision in all applicable procurement procedures, solicitations, and contracts.</li> </ul> </li> <li>Updates regulations to clarify that over 51% of a food product must consist of agricultural commodities that were grown domestically.</li> <li>Adds language to the regulations that explain how Buy American applies to fish and fish products.</li> </ul>
<b>Geographic Preference Expansion</b>	<ul style="list-style-type: none"> <li>Since 2011, child nutrition regulations allow geographic preference but do not allow “local” to be used as a bid specification (a written description of the product or service that the vendor must meet to be considered responsive and responsible).</li> <li>Currently, bidders located in a specified geographic area can be provided additional points or credit calculated during the evaluation of the proposals or bids received in response to a solicitation.</li> <li>Regulations affected: 7 CFR 210.21(g) and 220.16(f)</li> </ul>	<ul style="list-style-type: none"> <li>Allows “locally grown, raised, or caught” to be used as procurement specifications for unprocessed or minimally processed food items, which makes it easier for program operators to purchase local foods for child nutrition programs.</li> </ul>

<sup>1</sup>The new standards related to school meals apply to grades K-12 only. They do not apply to infant and preschool meal patterns found under NSLP and SBP regulations as the infant and preschool meal patterns were last updated in 2016 with the Child and Adult Care Food Program meal patterns (7 CFR 210.10(o)(3), (o)(4), (p), and (q); 7 CFR 220.8(o) and (p)).

<sup>2</sup> Final Standards for Added Sugars (Category Specific):

- Breakfast cereals** will be limited to no more than 6 grams of added sugars per dry ounce.
- Yogurts** will be limited to no more than 12 grams of added sugars per 6 ounces, or 2 grams of added sugar per ounce.
- Flavored milks** will be limited to 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.

**3 School Breakfast Program Transitional Sodium Limits**

<b>Age/Grade Group</b>	<b>Target 1: Effective July 1, 2022</b>
Grades K-5	≤ 540 mg
Grades 6-8	≤ 600 mg
Grades 9-12	≤ 640 mg

**4 National School Lunch Program Transitional Sodium Limits**

<b>Age/Grade Group</b>	<b>Target 1: Effective July 1, 2022</b>	<b>Interim Target 1A: Effective July 1, 2023</b>
Grades K-5	≤ 1,230 mg	≤ 1,110 mg
Grades 6-8	≤ 1,360 mg	≤ 1,225 mg
Grades 9-12	≤ 1,420 mg	≤ 1,280 mg

**5 School Breakfast Program Proposed Sodium Limits**

<b>Age/Grade Group</b>	<b>Sodium Limit: Effective July 1, 2027</b>
Grades K-5	≤ 485 mg
Grades 6-8	≤ 535 mg
Grades 9-12	≤ 570 mg

**6 National School Lunch Program Proposed Sodium Limits**

<b>Age/Grade Group</b>	<b>Sodium Limit: Effective July 1, 2027</b>
Grades K-5	≤ 935 mg
Grades 6-8	≤ 1,035 mg
Grades 9-12	≤ 1,080 mg