

USDA ISSUES PROPOSED RULE TO UPDATE SCHOOL NUTRITION STANDARDS

APPENDIX

Provision	Current Standard	Proposed Standard ¹
Added Sugars	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • Product-based limits for grain-based desserts, breakfast cereals, yogurts, and flavored milks, effective in school year (SY) 2025-26.² • Weekly added sugars limit that must average less than 10% of calories per meal, effective SY 2027-28.
Milk	<ul style="list-style-type: none"> • Allows flavored and unflavored for all grades K-12 (only fat-free and low-fat milks are allowed). • Requires unflavored milk to be offered at each school meal service. • Regulations affected: 7 CFR 210.10(d)(1)(i) and 220.8(d) 	<p>Two options under consideration, both of which would include the new added sugars limit for flavored milk and maintain the requirement that unflavored milk is offered at each meal service:</p> <ul style="list-style-type: none"> • Option 1: Allow only unflavored milk for grades K-8 and allow flavored and unflavored for grades 9-12. OR Allow only unflavored milk for grades K-5 and allow flavored and unflavored for grades 6-12. Either proposal would be effective SY 2025-26. • Option 2: Continue to allow flavored and unflavored milks for all grades (K-12).
Grains	<ul style="list-style-type: none"> • Requires at least 80% of the weekly grains offered to be whole grain-rich; remaining grain items offered must be enriched. • Regulations affected: 7 CFR 210.10(c)(2)(iv) and 220.8(c)(2)(iv) 	<p>Two options under consideration:</p> <ul style="list-style-type: none"> • Keep the current standard. • Require all grains to meet the whole grain-rich requirement, except enriched grains may be offered one day each school week.
Sodium	<ul style="list-style-type: none"> • Meet Sodium Target 1³ for school breakfast and lunch (and Target 1A⁴ for school lunch-only by school year 2023-24). • Regulations affected: 7 CFR 210.10(c) and (f)(3); 220.8(c) and (f)(3) 	<ul style="list-style-type: none"> • School breakfast – two reductions (10% each) in SY 2025-26 and 2027-28.⁵ • School lunch – three reductions (10% each) in SY 2025-26, 2027-28, and 2029-30.⁶
NSLP Afterschool Snacks	<ul style="list-style-type: none"> • 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. • Regulations affected: 7 CFR 210.10(o) 	<ul style="list-style-type: none"> • 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. • Makes fruit and vegetables two separate components, rather than being combined as one. • Applies other CACFP snack nutrition requirements to NSLP snacks to align with statute.
Substituting Vegetables for Fruits at Breakfast	<ul style="list-style-type: none"> • 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 for fruits at breakfast. • Regulations affected: 7 CFR 220.8(c) 	<ul style="list-style-type: none"> • Schools that substitute vegetables for fruits at breakfast more than one day per school week are required to offer different vegetable subgroups throughout the week.

<p>Nuts and Seeds</p>	<ul style="list-style-type: none"> • 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. • 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) 	<ul style="list-style-type: none"> • Allows nuts and seeds to credit for 100% of the meat/meat alternate component in all child nutrition programs and meals.
<p>Competitive Foods (Smart Snacks) – Hummus Exemption</p>	<ul style="list-style-type: none"> • Competitive foods must meet nutrient standards for calories, sodium, fats, and total sugars at 7 CFR 210.11(f). • 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. 	<ul style="list-style-type: none"> • Keeps the current competitive food nutrient standards for calories, sodium, fats, and total sugars. • Adds hummus to the list of foods exempt from the total fat standard in the regulations, allowing hummus to be sold as a Smart Snack.
<p>Buy American</p>	<ul style="list-style-type: none"> • School food authorities must purchase domestic commodities or products to the maximum extent practicable. • Two limited exceptions, related to product availability and cost, are provided in guidance. • Regulations affected: 7 CFR 210.21(d) and 220.16(d) 	<ul style="list-style-type: none"> • Sets a 5% limit on non-domestic food purchases when a school food authority utilizes an exception. • 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"> o School food authorities would need to maintain documentation showing that no more than 5% of their total annual commercial food costs are for non-domestic foods. o School food authorities would be required to include the Buy American provision in all applicable procurement procedures, solicitations, and contracts. • Updates regulations to clarify that over 51% of a food product must consist of agricultural commodities that were grown domestically. • Adds language to the regulations that explain how Buy American applies to fish and fish products.
<p>Geographic Preference Expansion</p>	<ul style="list-style-type: none"> • 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). • 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. • Regulations affected: 7 CFR 210.21(g) and 220.16(f) 	<ul style="list-style-type: none"> • 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.

¹ The proposed 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)).

² Proposed Standards for Added Sugars (Category Specific):

- **Grain-based desserts**, which include cereal bars, doughnuts, sweet rolls, toaster pastries, coffee cakes, and fruit turnovers, would be limited to no more than 2 ounce equivalents per week in school breakfast, consistent with the current limit for school lunch.
- **Breakfast cereals** would be limited to no more than 6 grams of added sugars per dry ounce.
- **Yogurts** would be limited to no more than 12 grams of added sugars per 6 ounces.
- **Flavored milks** would 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**

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

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

Age/Grade Group	Target 1: Effective July 1, 2022	Interim Target 1A: Effective July 1, 2023
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**

Age/Grade Group	Sodium Limit: Effective July 1, 2025	Sodium Limit: Effective July 1, 2027
Grades K-5	≤ 485 mg	≤ 435 mg
Grades 6-8	≤ 540 mg	≤ 485 mg
Grades 9-12	≤ 575 mg	≤ 520 mg

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

Age/Grade Group	Sodium Limit: Effective July 1, 2025	Sodium Limit: Effective July 1, 2027	Sodium Limit: Effective July 1, 2029
Grades K-5	≤ 1,000 mg	≤ 900 mg	≤ 810 mg
Grades 6-8	≤ 1,105 mg	≤ 990 mg	≤ 895 mg
Grades 9-12	≤ 1,150 mg	≤ 1,035 mg	≤ 935 mg