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To: All Sponsors Participating in the National School Lunch and School Breakfast Programs

From: Arleen Ramos-Szatmary, M.S.
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Date: April 11, 2025

Subject: Guidance on the Final Rule – Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans

On April 25, 2024, USDA's Food and Nutrition Service (FNS) published the final rule titled, *Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans*. These changes, which are effective for the 2025-2026 School Year unless noted otherwise, are based on a comprehensive review of the Dietary Guidelines for Americans, stakeholder input on the meal patterns, and lessons learned from prior rulemakings. SFAs should note the following key changes to the School Meals Programs in the areas of Nutrient Requirements, Menu Flexibilities, and Program Operations:

Nutrient Requirements - Added Sugars:

Beginning in the 2025-2026 School Year, product-based limits will be placed on breakfast cereals, yogurt and flavored milk for all meal patterns (including preschool) as follows:

- **Breakfast Cereals** must not contain more than 6 grams of added sugars per dry ounce
- **Yogurt** must not contain more than 12 grams of added sugars per 6 ounces
- **Flavored Milk** must not contain more than 10 grams of added sugars per 8 fluid ounces. *Please note: Flavored Milk is not creditable under the Preschool Meal Pattern.*

Beginning in the 2027-2028 School Year, added sugars must be less than 10% of calories per week in the school lunch and breakfast programs. These weekly limits will be in addition to product-based limits.

The Institute of Child Nutrition provides a series of Sugar Reduction for Schools Fact Sheets that will be helpful for Child Nutrition Professionals. USDA's Team Nutrition also offers a Reducing Added Sugars at School Breakfast resource guide, as well as Road to Successful Menu Planning for School Meals training videos on identifying and reducing added sugars that can serve as additional resources.

Nutrient Requirements - Sodium Limits:

SFAs will maintain current sodium limits through SY2026-2027. Beginning July 1, 2027, schools must implement a 15% reduction for lunch and a 10% reduction for breakfast from current sodium limits as follows:

National School Lunch Program		School Breakfast Program	
Age/Grade Group	**Sodium Limit by SY2027-2028**	**Age/Grade Group**	**Sodium Limit by SY2027-2028**
Grades K-5	≤ 935 mg	Grades K-5	≤ 485 mg
Grades 6-8	≤ 1,035 mg	Grades 6-8	≤ 535 mg
Grades 9-12	≤ 1,080 mg	Grades 9-12	≤ 570 mg

While the new sodium limits are not required until the 2027-2028 School Year, SFAs may find it helpful to begin educating students and parents this year on the coming changes. The Institute of Child Nutrition's Shake It Up Resource Page offers a plethora of resources for Child Nutrition Professionals that will be helpful in reaching the new sodium limits.

Menu Planning Flexibilities – Afterschool Snack Meal Pattern

The final rule updates National School Lunch Program afterschool snacks meal pattern requirements for K-12 children to align with Child and Adult Care Food Program snack requirements effective July 1, 2025.

Students must be offered **two of the five components** for an afterschool snack to be reimbursable (fruits and vegetables are now considered separate components, consistent with the National School Lunch Program meal pattern). The five components, along with minimum portion sizes and key changes, are as follows:

Component	Minimum Portion Size	Key Changes & Reminders
Fluid Milk	8 ounces	May serve fat-free, unflavored or flavored milk ~or~ low-fat, unflavored or flavored milk
Meat/Meat Alternate	1 ounce equivalent	
Grain	1 ounce equivalent	-80% of weekly grains served must be whole grain-rich -Grain-based desserts (cookies, donuts, bars, toaster pastries, etc.) are not creditable as grains
Vegetable	¾ cup	Raw leafy greens credit as ½ of the volume served (1/2 cup lettuce = ¼ cup vegetable)
Fruit	¾ cup	-No more than half of the weekly fruit requirement can be in the form of juice -Dried fruit credits as twice the volume (1/4 cup raisins = ½ cup fruit)

SFAs should also note the following when planning afterschool snack menus:

- Consistent with the National School Lunch and School Breakfast Program nutrient requirements, added sugars will be limited in breakfast cereals (≤6 grams per dry ounce) and yogurt (≤12 grams per 6 ounces).
- When fluid milk is served as one of the two required components of an afterschool snack, the other required meal component must not be a beverage (ie, milk and juice cannot be served as an afterschool snack).
- Deep-fat fried foods are not reimbursable.
- The portion sizes listed above are **minimum** requirements. Larger portion sizes may be served and are highly encouraged for children ages 13-18.
- SFAs serving afterschool snacks to preschool students who are not comingled must follow the CACFP Snack Meal Pattern.

The School Nutrition Programs Unit will be presenting an Afterschool Snack Webinar Training this summer, which will include the new meal pattern and Afterschool Snack requirements. SFAs may also refer to USDA's Menu Planning for NSLP Afterschool Snack Service Webinar for additional information.

Menu Planning Flexibilities - Meat & Meat Alternates at Breakfast:

The final rule establishes a combined grains and meats/meat alternates meal component in the School Breakfast Program and removes the requirement for schools to offer 1.0 ounce equivalent of grains each day at breakfast. Schools may offer grains, meats/meat alternates, or a combination of both to meet the minimum ounce equivalent in this combined meal component requirement.

SFAs may also reference USDA's updated Offering Meats and Meat Alternates at School Breakfast resource guide for additional information.

Menu Planning Flexibilities – Substituting Vegetables for Fruits at Breakfast:

The final rule continues to allow schools to substitute vegetables for fruits in the School Breakfast Program and simplifies the vegetable variety:

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

Menu Planning Flexibilities – Beans, Peas and Lentils at Lunch:

The final rule changes the name of the "legumes (beans and peas)" vegetable subgroup to "beans, peas and lentils". In addition, schools may now count beans, peas, and lentils offered as meat/meat alternates at lunch 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 meat/meat alternates 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.

Menu Planning Flexibilities – Nuts and Seeds:

Nuts and seeds may now credit for the full meat/meat alternates component in all meals. Nuts and seeds can continue to meet the entire meat/meat alternates requirement for afterschool snack.

Menu Planning Flexibilities – Bean Dip Exemption:

The final rule adds bean dip to the list of foods exempt from the total fat standard in the Smart Snacks regulations. This exemption applies to products marketed as hummus as well as bean dips made from any variety of beans, peas, or lentils. Bean dip will continue to be subject to the saturated fat standard for Smart Snacks, as well as all other Smart Snacks requirements. This change provides SFAs with the option to sell bean dip, including hummus, as a Smart Snack.

Program Operations – Professionals Standards for Medium and Large SFAs

The final rule allows State agencies the discretion to approve the hiring of a professional with 10 or more years of school nutrition program experience but who does not hold a bachelor's or an associate's degree to serve as a school nutrition program director in a medium or large SFA. Directors hired under this exception must have a high school diploma or GED.

Program Operations – 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 child or adult participants with disabilities. The final rule defines a State licensed healthcare professional as an individual authorized to write medical prescriptions

under State law and expands the authority to write medical statements to registered dietitians. The rule also encourages schools to meet participants' non-disability (e.g., cultural, ethical, Tribal, and religious) dietary preferences.

Please refer to the Requirement to Accept Medical Statements from Registered Dietitians for Schools and Child and Adult Care Institutions and Facilities Memo for additional guidance.

Program Operations – Geographic Preference

The final rule allows "locally grown," "locally raised," or "locally caught" as procurement specifications for unprocessed or minimally processed food items. SFAs may refer to USDA's Procuring Local Foods website for additional information and resources.

Program Operations – Artificial *Trans* Fats

The U.S. Food and Drug Administration (FDA)'s actions to eliminate artificial trans fats from the U.S. food supply have effectively eliminated artificial trans fats from foods made or sold in the U.S. This rule removes the dietary specification prohibiting artificial trans fats in the National School Lunch Program, School Breakfast Program, and Smart Snacks in School.

Program Operations – Buy American

The final rule adds the limited exceptions to the Buy American requirements related to product availability and/or cost to the regulations. It 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 into contracts for food used in the school lunch and breakfast programs.

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. USDA will use a phased-in approach to gradually reach the 5 percent cap on non-domestic food purchases. The approach includes a 10 percent cap on non-domestic food purchases beginning in School Year 2025-2026, an 8 percent cap beginning in School Year 2028-2029, and a 5 percent cap beginning in School Year 2031-2032. Items that appear on the exceptions list still count toward the cap.

SFAs may refer to the Buy American Provisions Related to the Final Rule Memo for additional information.

Please note that this memo focuses on key operational changes and updates that relate to New Jersey SFAs and is not a comprehensive listing of all changes codified in the Final Rule. SFAs may refer to the *Final Rule – Child Nutrition Programs: Meal Patterns Consistent with the 2020 – 2025 Dietary Guidelines* website for additional information and resources.

The School Nutrition Programs Team is currently updating all resources and documents to reflect these important changes, and appreciates the time, work and effort on behalf of all SFAs to incorporate the updated requirements and provide nutritious, culturally responsive and balanced meals to New Jersey students.

Questions can be directed to snp@ag.nj.gov.